

# Governance, Responsibility & Accountability

**Everyone has a shared responsibility for managing fatigue-related risks** and maintaining safety in the clinical practice and training environment.

To ensure a FRM plan or strategy will be prioritized and effective, it is necessary to establish a local governance structure that clearly outlines the roles and responsibilities of key organization leaders, including Hospital Administrators, Decanal Team, Postgraduate Medical Education Offices, Program Directors, and clinical and educational supervisors, as well as learners. An important component of any governance structure is clearly defined mechanisms of accountability.

Accountability for FRM will vary based on locally available resources, personnel and care delivery settings. While autonomy for the establishment of a governance structure that is reflective of the local context rests with each training site, the roles and responsibilities within should be ultimately fortified by a commitment to both learner and patient safety, as outlined in the FRM Foundational Principles.

# Recommendations for Allocating Responsibility

Certifying colleges have a responsibility to mandate safety standards and requirements, and conduct audits to ensure compliance. In situations where an organization does not comply with regulations or safety is improperly managed and results in an incident or accident, the organization and its leaders could be held legally liable.

**LEARNERS** have a responsibility to obtain sufficient sleep and to identify when they have not been able to do so or believe they are at risk of making a fatigue-related error. Learners are responsible for reporting any situation where they observe fatigue-related risks posing a threat to their own or to patient health and safety. Incident or event reporting is to be confidential and for the purposes of maintaining a safe learning environment, therefore residents should feel safe in voicing and reporting any fatigue related risks they observe.

**MANAGERS & SUPERVISORS** have a responsibility to create a work environment that reduces fatigue-related risks, provide adequate sleep opportunities, and take appropriate action if an employee is not fit for work. Supervisors also have a responsibility to ensure that incident and accident reporting is conducted in a safe and confidential manner, such that learners do not fear reprisal when reporting.



Although each member of these groups has specific roles and responsibilities, to ensure the health and safety of patients, staff, and learners, the successful implementation of an effective FRM plan requires the development of a 'just' safety culture in which fatigue risk management is the norm. An openly communicative working environment, including non-punitive incident reporting and investigations with a focus on continuous quality improvement is a prerequisite to obtaining open feedback about FRM policies and programs and for identifying any fatigue-related incidents, errors, or near misses.

Consideration for accommodation of learners with disabilities should be given, including efforts to ensure that those who have been diagnosed with sleep disorders or conditions that impact sleep are entitled to the same opportunities as those learners without disabilities. The duty to accommodate medical learners with special needs can be managed and evaluated on a case-by-case basis and at the local level and at the discretion of the individual program. Ultimately, any accommodation arrangement should not compromise or interfere with the wellbeing and safety of patients, learners and staff. Consultation and alignment with local PGME policies and regional human rights legislation regarding the duty to accommodate learners with disabilities is an important step in integrating a just and equitable FRM plan.

# FRM Roles & Responsibilities

- ▶ CERTIFYING COLLEGES
- ▶ HOSPITAL ADMINISTRATORS
- ▶ DECANAL TEAM
- ▶ CLINICAL EDUCATORS & SUPERVISORS
- ▶ PROGRAM DIRECTORS
- ▶ LEARNERS
- ▶ OVERSIGHT & MONITORING
- ▶ FRM LOCAL WORKING GROUP (LWG) OR OFFICER

The subsequent section describes a recommended set of responsibilities for each role within the postgraduate medical education system. These are not prescriptive, but do provide a framework on which to base the organization of accountability and governance within the local practice and working environment.

## ▶ Certifying Colleges (RC, CMQ, CFPC)

- Establish education and accreditation standards and requirements
- Evaluate compliance with established FRM policies, procedures and safety training
- Audit non-compliance/evaluate compliance

## ▶ Hospital Administrators

- Allocate resources to support the implementation of a FRM plan
- Work with the Postgraduate Deans and Program Directors to identify a person or group of people to develop a FRM policy appropriate to the local context
- Ensure the FRM policy complies with national and provincial/territorial policies and health and safety policies
- Support the implementation of the FRM policy
- Ensure medical and clinical staff under their supervision comply with the FRM plan
- Work with schedulers to ensure duty schedules provide sufficient opportunity for rest and recovery between shifts
- Investigate where appropriate, fatigue related accidents/incidents
- Participate in the continuous evaluation, monitoring, and improvement of residency programs and address issues affecting residence program quality

### ► Decanal Team

- Allocate resources to support the implementation of a FRM policy
- Ensure FRM policies and practices meet accreditation standards
- Work with Program Directors to develop a FRM policy appropriate to the local context
- Ensure medical and clinical staff under their supervision comply with the FRM plan
- Ensure FRM measures are appropriate
- Prioritise allocation of resources to reduce highest levels of fatigue risk
- Ensure processes are developed to respond to reports of fatigue-related incidents, errors, and/or behaviours in an appropriate manner
- Participate in the continuous evaluation, monitoring, and improvement of residency programs and address issues affecting residence program quality

### ► Clinical Educators & Supervisors

- Participate in FRM training and education
- Incorporate educational resources and information on fatigue prevention, mitigation, and recognition strategies
- Identify and report fatigue related risks to the FRM Local Working Group (LWG)
- Ensure learners under their supervision comply with the FRM strategy or plan

### ► Clinical Educators & Supervisors (cont'd)

- Advise program directors of barriers preventing the effective management of fatigue-related risks
- Arrive at shift in a state fit to safely conduct duties
- Report when they have not been able to obtain sufficient sleep or believe they are at risk of making a fatigue-related error
- Respond to declarations of fatigue in a manner that upholds patient and learner health and safety
- Respond to reports of fatigue-related incidents, errors, and/or behaviours appropriately and as per program/institution policy responsibly
- Appropriately supervise learners and actively promotes the safety and wellness of patients and learners
- Utilize appropriate Fatigue Risk Mitigation Strategies when Learners experience fatigue and take appropriate action if a Learner is not fit for duty
- Ensure there are effective centralized policies addressing fatigue risk management
- Participate in the continuous evaluation, monitoring, and improvement of residency programs and address issues affecting residence program quality

## ► Program Directors

- Work with Postgraduate Dean to develop a FRM policy and ensure its implementation
- Monitor faculty, staff, and learners to guarantee participation in FRM training and education
- Participate in FRM training of residents and faculty
- Incorporate educational resources and information on fatigue prevention, mitigation, and recognition strategies in program
- Ensure FRM measures are appropriate
- Prioritise allocation of resources to reduce highest levels of fatigue risk
- Monitor compliance with the FRM Policy
- Advise postgraduate deans of barriers preventing the effective management of fatigue-related risks
- Ensure suitable processes are in place to respond to reports of fatigue-related incidents, errors, and/or behaviours in an appropriate manner via the FRM Local Working Group and/or appropriate risk management committee
- Participate in the continuous evaluation, monitoring, and improvement of residency programs and address issues affecting residence program quality

## ► Learners

- Arrive at shift in a state fit to safely conduct duties
- Use time outside of work to obtain adequate rest and to ensure fitness for work
- Report when they have not been able obtain sufficient sleep or believe they are at risk of making a fatigue-related error
- Collectively identify and report context-specific fatigue related risks to the Fatigue Risk Management Local Working Group
- Individually report specific errors and fatigue-related behaviours or situations that may present a fatigue-related risk
- Complete all training required by the local FRM strategy
- Employ appropriate Fatigue Risk Mitigation Strategies
- Participate in the continuous evaluation, monitoring, and improvement of residency programs and address issues affecting residence program quality

## ► Oversight & Monitoring

Depending on the size and structure of the training context, it may be useful to convene either a Local Working Group or Officer responsible for oversight of the FRM plan in place. This body can also choose to employ a Fatigue Risk Register (described below) as a means of monitoring the fatigue risk particular to the local training site. While this group/individual and the mechanisms by which they operate and monitor fatigue can be designed and adapted to suit the site-specific needs, a description of the role of this group is provided below, along with the key elements that can be included in a Fatigue Risk Register.

## ► FRM Local Working Group (LWG) or Officer

To help implement a FRM plan, a FRM Local Working Group/FRM Officer role can be established to oversee the management of fatigue-related risk specific to the local training context. The LWG or officer plays a central role in establishing a culture in which fatigue risk management is well received and accepted as a normal practice within the workplace. The LWG would regularly assess and improve upon existing FRM policies and practices to ensure procedures remain relevant to the local context and that best practices suitable to the context are in place. This role also functions as a conduit between the staff, learners and administrators in identifying priorities and areas for improvement in the local FRM strategy.

The LWG may be comprised of key leaders who can provide insight into the management and operation of the facilities. The LWG should include, but is not limited to at least one member of each of the following groups:

- The institutional leadership;
- The program leadership;
- Faculty members; and
- Learners

The LWG responsibilities may include:

- Reporting regularly to program directors
- Liaising with the patient safety committee(s) and/or health and safety officer to ensure policies and procedures align and are consistent
- Designing and implementing site-specific FRM strategies, including conducting the assessment of risks inherent to a particular training context
- Continuously reviewing, monitoring and improving fatigue risk management practices based on developing operational needs and feedback (including collect documentation regarding the frequency and nature of threshold violations, fatigue report forms, and other reports as deemed necessary)
- Conducting investigations into fatigue-related accidents or incidents
- Ensuring that the act of reporting an incident or adverse event by learners or supervisors is protected and handled in a safe and confidential manner

## Governance, Responsibility, and Accountability: Key Tasks

- 1 Obtain high-level commitment across the facility to develop and implement FRM.
- 2 Establish support and resources to implement a FRM plan.
- 3 Identify a FRM Governance Officer and/or Local FRM Working Group to oversee the implementation of a plan for FRM, assess the risk of fatigue in the local context, outline the roles and responsibilities of managers, supervisors, and learners, develop FRM policies, and continuously monitor procedures.