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# Clinician Staff Records Audit

International Health and Medical Services (IHMS)

December 2015

Released by Department of Home Affairs  
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## Introduction

The Department of Immigration and Border Protection (DIBP) conducted a sample audit of International Health and Medical Services' (IHMS) clinician staff records under the Immigration Detention Health Services Contract (IDHSC) and Regional Processing Countries Health Services Contract (RPCHSC) on Thursday 26 November and Friday 27 November 2015 at IHMS offices in Sydney.

The audit reviewed a combined 57 records for clinicians delivering services during November 2015 across all onshore facilities and a combined 52 records for clinicians delivering services at the Manus and Nauru Regional Processing Centres (RPC).

The tool used for the audit was developed by the Department Performance Management Team and endorsed by IHMS. The tool incorporates key contractual requirements and is broken into the following elements:

- Code of Conduct training;
- Induction training;
- Police background check;
- Working with children check;
- Basic life support / Advanced life support training;
- Professional registration check (AHPRA or equivalent); and
- Foreign certification (RPCHSC).

## IDHSC Contract Requirements

Clause 2.1.2 (a), Annexure C of **Schedule 3 – Business Services** within the IDHSC describes the requirement of all IHMS personnel delivering healthcare are appropriately qualified and registered with the Australian Health Practitioner.

Clause 13.1.2 (d) and (e) of **Schedule 3 - Business Services** within the IDHSC describes the requirements of IHMS personnel having undergone and obtained relevant police checks and Working with Children checks.

Annexure A of **Schedule 3 - Business Services** within the IDHSC describes the Code of Conduct requirements of all IHMS personnel.

Clause 1, Annexure C of **Schedule 3 – Business Services** within the IDHSC describes the requirement of induction and Code of Conduct training be completed prior to commencement at a facility.

## IDHSC Performance Management Requirements

Performance Measure 10 – Maintenance of Health Care Records within Annexure A, **Schedule 5 – Performance Management Framework** requires:

- All clinical staff maintain a valid police and working with children checks;
- Maintain professional registration through the Australian Health Practitioner Regulation Authority (AHPRA); and

- Maintain competency in basic life support (BLS) for all facilities and advanced life support (ALS) for rural and remote facilities.

Each facility must maintain 100% accuracy to achieve compliance for this measure.

## RPCHSC Contract Requirements

Clause 6.1 of **Schedule 2 – Statement of Works**, within the RPCHSC outlines the requirements of the Health Service Provider and Induction and Code of Conduct training.

**Schedule 4.2, Annexure A - Code of Conduct** within the RPCHSC describes the Code of Conduct requirements of all IHMS personnel.

Clause 6.3 (c) i and ii, **Schedule 2 - Statement of Work** within the RPCHSC describes the requirements of IHMS personnel having undergone and obtained relevant police and Working with Children Checks, where applicable.

Clause 6.1 of **Schedule 2 (Statement of Work)**, within the RPCHSC outlines the requirements of the Health Service Provider and Induction Records.

Clause 6.2 of **Schedule 2 (Statement of Work)** within the RPCHSC outlines the requirements of the Health Service Provider and RPCHSC Professional registration check.

## RPCHSC Performance Management Requirements

Under the Individual Service Provider Report (ISPR) for Manus and Nauru RPCs are the following requirements:

### **8.4 Qualifications, skills, registration and insurance requirements for health care providers:**

IHMS must ensure that all IHMS personnel and network providers are:

- a) appropriately licensed;
- b) registered to practice with the relevant body;
- c) undergone and obtained up to date AFP checks (or the equivalent for other country staff); and
- d) undergone and obtained up to date working with children checks (WWCC).

Compliance threshold: 100%

### **8.5 Induction programme and ongoing training:**

Ensure all IHMS personnel complete induction training appropriate for the individual prior to commencing any work with detainees or delivering Health Care under the Contract.

Compliance threshold: 95%



## Results

The results of the audit are contained in **Attachment A** and the performance failures identified were submitted and approved in the IHMS November 2015 monthly performance report and the IHMS November ISPRs.

## Observations

### Induction Training

The IDHSC states at clause 2.2, Annexure C of **Schedule 3 – Business Services** and the RPCHSC at clause 6.1 of **Schedule 2 (Statement of Work)** the requirement that all induction training is completed prior to commencing any work with detainees or delivering Health Care under the Contract.

Based on the information maintained by IHMS, it is unclear if induction training is completed prior to delivering Health Care under the IDHSC and RPCHSC. IHMS are not able to generate reports with completion date and time for induction training for IHMS personnel who have commenced delivering Health Care to detainees. This is completed by a manual audit.

**ACTION:** IHMS to develop a method of determining that induction training has been completed rather than just by random manual

### Code of Conduct Training

The IDHSC states at Clause 1.1.2, Annexure C of **Schedule 3 - Business Services** and the RPCHSC at Cluse 6.1 (c) **Schedule 2 – Statement of Works** the requirement that Code of Conduct training be completed prior to a person being deployed. As stated in the IHMS induction training package, Code of Conduct training is to be completed within the first week of people being deployed. This does not satisfy the contractual requirements contained in the IDHSC and RPCHSC.

**ACTION:** IHMS to implement procedures to ensure that personnel have completed Code of Conduct training prior to commencement.

### Working with Children checks (Nauru)

There is no legislation in Nauru that requires working with children checks be held for personnel working with minors. As per the performance measures and the contract, IHMS personnel working closely with children are required to undergo a working with children check in the state or territory they reside in. The extent of these working with children checks do not carry over to the Republic of Nauru. Furthermore, other country nationals employed by IHMS who do not have working with children checks requirements in their country of residence are required to sign a consent form advising that they have had no convictions that would prevent them from working in the vicinity of children or minors.

**ACTION:** To be noted by the Department

### Attachments:

- A. November 2015 Clinician Staff Record Results

Attachment A

IDHSC Clinician Audit (combined)

	Number required	Recorded	Not recorded	Compliant
Basic / Advanced life support				
Copy on file	58	57	1	52
Expiry date recorded	58	54	5	
AFP Checks				
Copy on file	58	57	1	57
Expiry date recorded	58	57	1	
Working With Children Checks				
Copy on file	20	20	0	16
Expiry date recorded	20	16	4	
Induction training				
Copy on file	58	See commentary in observations		
Expiry date recorded	58			
Code of conduct training				
Copy on file	58	50	8	50
Expiry date recorded	58	50	8	

Attachment A

RPCHSC Clinician Audit (combined)

	Manus				Nauru			
	Number required	Recorded	Not recorded	Compliant	Number required	Recorded	Not recorded	Compliant
Professional Registration Check								
Copy on file	26	26	0	26	26	26	0	26
Expiry date recorded	26	26	0		26	26	0	
Foreign Certification Check								
Copy on file	14	14	0	14	13	13	0	13
AFP Checks								
Copy on file	26	26	0	26	26	26	0	26
Expiry date recorded	26	26	0		26	26		
Working With Children Checks								
Copy on file	not required	not required	not required	not required	26	26	0	26
Expiry date recorded	not required	not required	not required		26	26	0	
Induction training								
Copy on file	26	See commentary in observations			26	See commentary in observations		
Expiry date recorded	26				26			
Code of conduct training								
Copy on file	26	19	7	14	26	26	0	26
Expiry date recorded	26	19	7		26	26	0	