

**HEALTH SERVICE EXECUTIVE
EMPLOYEE RELATIONS ADVISORY & ASSURANCE SERVICES**

DRAFT POLICY on Management of Work Related Aggression & Violence

FEEDBACK FORM

**Please return your comments in the format below to Martina Canavan or Sharon O'Sullivan, Employee Relations Officer, CERS martina.canavan@hse.ie
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by Friday, 11 January 2014**

Feedback from:	Nursing and Midwifery Board of Ireland
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General Comments:

NMBI welcomes the opportunity to respond and provide feedback on this important draft policy.

NMBI commends the requirement that staff must sign that they have read, understood and agree to adhere to the policy, this is a fundamental requirement in terms of accountability including professional accountability.

The NMBI welcomes the concurrent focus in the document; the safety of service users and employees within a safe care environment.

NMBI welcomes that the policy emphasises risk assessment and risk reduction. The NMBI welcomes the acknowledgement of the complexity of the issue and commends that the policy emphasises the importance of resources and the provision of appropriate training. NMBI contend that competence in this area of professional practice can be supported by appropriate targeted/specific training. However evidence suggests that many forms of training in this area does not yield competence or confidence in employees, ensuring that education and training programmes are targeted to meet the needs of individuals in different services and with differing scopes of practice is essential. Furthermore training updates in the area is vital to ensure that knowledge and skills are up to date.

The recognition that risk is both an organisational and individual responsibility is commended.

Specific comments

Page number	Section number	Section heading	Comment
5	2.0	Purpose	Is there a plan to have a national incident reporting structure/tool and process linked to this policy?
7	5.0	Incident	Double full stop second last sentence in paragraph
8	5.0	Resident	Section heading is not double spaced.
10	6.2	Senior and line managers	In terms of governance and accountability the policy should separate the roles of senior and line managers.
10	6.2.5	Senior and line managers	This is a critical issue because evidence from Irish and international evidence suggest that there is at times a limited relationship between education and training and competence in recognizing, preventing and managing work related aggression and violence.
12	7.0	Risk management and Risk Assessment	It is contended that risk assessment must precede risk management; this should be reflected in the title. Are the “appropriate risk management systems” referred to in 7.1.1 national? The reference to reviewing control measures “periodically” is potentially vague and the period should be specified. While a sample risk assessment is provided in Appendix 1, does the HSE plan to introduce a national risk assessment instrument?
14	7.2.5-7.2.7	Reporting and Managing incidents	Are there plans to collate data on incidents nationally to use for audit, education and training and research purposes?
14	7.31	Risk Register	Sentence structure/grammar problem with the first sentence.
15	7.4.4	Training	Statement should reference competence
15	7.4.6	Training	Statement should reference accredited
16	7.4.9	Training	Typographical error sentence structure problem with the statement

16	7.4.10	Training	While the statement is most appropriate, consideration should be given to making it the first statement of the section as is the case in 7.5.1.
16	7.5	Use of Physical Interventions	Is there merit in introducing the concept of prescribed physical interventions at the outset of this section?
17	7.5.6	Use of Physical interventions	Is there merit to insisting that decisions in relation to physical restraint should be multi-disciplinary and in addition to time limited should be monitored?
17	7.5.9	Use of physical interventions	Expand to include service user advocates
17	7.5.13	Use of physical interventions	Statement should include “evaluated”
21	8.2	Implementation	Is there a plan to implement this nationally/regionally rather than at an individual service level only. The local implementation plan should be based on a national plan.