GIG CYMRU NHS WALES

Addysg a Gwella Iechyd Cymru (AaGIC)
Health Education and Improvement Wales (HEIW)

HEIW Medical Deanery Quality Management Risk Approach

(v3.0)



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Version History

Version	Date	Change Description	Status	Approval	Review Date
3.0	24/11/2025	Revised matrix	Final	SMT Approved 27/01/2026	30/01/2027

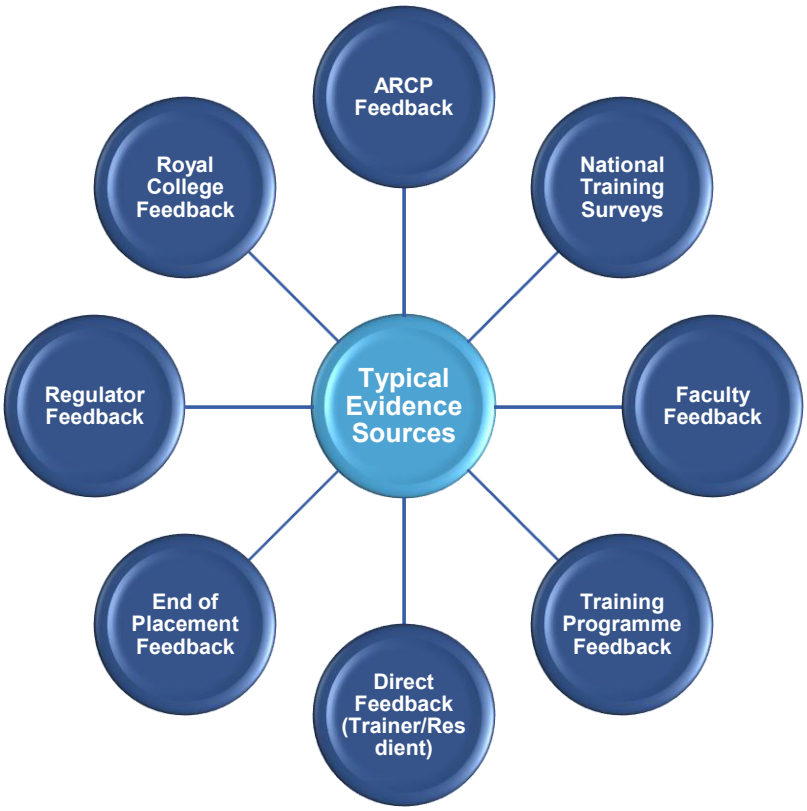
Context

HEIW is accountable to the GMC for the quality of postgraduate medical training in Wales. This is achieved through its Quality Management System comprised of routine and responsive processes. Where concerns are identified, a proportionate response is adopted, which is achieved through utilising a risk-based approach to prioritise training concerns and reduce the burden that can be associated with routine visit process. This document provides an overview of HEIW's approach to risk within the context of postgraduate medical training concerns.

Evidence Base

Potential concerns regarding the quality of postgraduate medical education and training may be identified through various sources. The radial diagram in Figure one below provides details of the typical sources of evidence that are utilised to identify training concerns. Whilst the evidence sources in the diagram represent the typical evidence base, all available sources of evidence will be considered.

Figure One: Sources of Evidence



Evidence is triangulated, and risk ratings are established in line with the matrix in the risk approach section.

Risk Approach

The risk allocation matrix in table 1 provides an overview of the risk categories utilised within medical quality management. As illustrated, there are three distinct categories, i.e. Low, Medium and High, each of which has a score range. The risk scores across the three categories range from one to sixteen. An additional level of granularity has been incorporated in the scoring system with the **odd numbers** applied to those **training concerns which are de-escalating** in risk and **even numbers** are allocated to those **concerns which are increasing** in risk. This is intended to provide an indication of the overall trajectory of a training concern.

The 'Risk Descriptors' provide a summary of the type of training concern which would fall into each category. To reflect the fact that training concerns may be managed with different levels of support, the 'Management Approach' column provides a brief overview of how a concern at a particular level would usually be managed.

Training concerns can be considered in terms of three categories as outlined below.

- **Patient or Resident Safety**
  This includes those concerns which directly impact on or have the potential to impact on the safety of patients or resident doctors. This includes clinical harm or the psychological safety of resident doctors which may be compromised due to challenging interactions or a fear of raising concerns.

- **Education and Training Delivery**
  These concerns are typically associated with an access to training opportunities, education and training delivery or difficulties in providing a specific learning experience. Persistent concerns of this nature may impact on resident progression.

- **Learning Environment**
  This relates to Educational Supervision, facilities or multiprofessional teamworking.

The risk categorisation relates to the extent to which a particular area is meeting GMC standards outlined in 'Promoting Excellence: standards for medical education and training' (GMC, 2016). As is implicit in the table, training concerns will not necessarily be assigned a low-risk rating initially. The rating will depend on the evidence base and whether any steps have been taken or are planned to address the concern.

Table One: Risk Allocation Matrix

Category	Score	Decreasing Risk Descriptors	Score	Increasing Risk Descriptors	Management Approach
Low Risk	**1**	One or more of the following statements may apply: **Level of Concern:** • The concerns have previously been **de-escalated** from a higher risk level. **Engagement & Action Plan Status:** • A **final update has been requested** before the concern is closed. • **Assessment of the long-term sustainability is completed and agreed** with the provider. • Where there have previously been concerns which have led to the withdrawal of residents, the provider has indicated that a return of residents in the future is intended. • Once active steps are underway to secure the return of residents, the risk score may be reassessed to confirm the ongoing suitability of the learning environment.	**2**	One or more of the following statements may apply: **Level of Concern:** • There is a **new or existing** concern which has escalated. • There is a **single source of evidence**, which is of low quality or incomplete. • The information does **not** suggest a significant impact on education & training delivery or the learning environment. • **No specific concerns related to patient or resident safety.**	• Emphasis is upon local management by the Faculty Team and/or the Specialty School. This comprises investigation and action planning as appropriate. Regular updates should be provided to the Quality Unit. • Oversight from the Quality Unit undertaken through reviewing regular updates from local/specialty leads as well as other evidence sources. • Visits are unlikely unless it has previously been a significant issue

	3	One or more of the following statements may apply: **Level of Concern:** • The concern has previously been **de-escalated** from a higher risk level. • The concern is **not** having a significant impact on education & training delivery or the learning environment. • **No specific concerns related to patient or resident safety.** **Engagement & Action Plan Status:** • A **final update has been requested** but the response is **awaited** before the concern is closed. • Action to address the concerns has been taken and there is **evidence of significant progress.** • **Assessment of long-term sustainability is ongoing**. • The significant concerns have been addressed but there **are minor residual concerns which require additional action**.	**4**	One or more of the following statements may apply: **Level of Concern:** • There is a **new or existing** concern. • There are **multiple sources** of evidence, which may be of low quality or incomplete. • The information does **not** suggest a significant impact on education & training delivery or the learning environment. • **No specific concerns related to patient or resident safety.** **Engagement & Action Plan Status:** • The **level of concern has escalated due to inadequate** investigation or action planning process or **limited evidence of improvement**. • **Additional evidence** regarding a concern which had a lower risk score may have been received, which increases the level of concern.	that has been de-escalated. • Maintaining a low risk allows for a constructive dialogue and progress to be monitored.

Medium	**5**	One or more of the following statements may apply: **Level of Concern:** • The concerns are having a **significant impact** on education & training delivery or the learning environment. • **No specific concerns related to patient or resident safety.** **Engagement & Action Plan Status:** • There is evidence that the solutions to the **original concerns have been sustained**. • There may be **moderate issues** to address with **significant evidence of progress**. **Quality Visit Progress & GMC Considerations:** • Progress will **no longer be reported to the GMC**. Concerns will **not** be in GMC Enhanced Monitoring.	**6**	One or more of the following statements may apply: **Level of Concern:** • The concerns are having a **significant impact** on education & training delivery or the learning environment. • **No specific concerns related to patient or resident safety.** • There are multiple sources of evidence, which are of a reasonable quality. **Engagement & Action Plan Status:** • The **level of concern has escalated due to inadequate** investigation or action planning process or **limited evidence of improvement**.	• Local management by the Faculty Team and/or the Specialty School continues to be a feature at this stage. This comprises investigation and action planning as appropriate. Regular updates should be provided to the Quality Unit. • Oversight from the Quality Unit undertaken through reviewing regular updates from local/specialty leads as well as other evidence sources. • Visit processes may also be instigated at this stage.

	7	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **moderate nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • There is evidence that the solutions to the **original concerns have been sustained**. • There may be **moderate** issues to address with **some evidence of progress**. **Quality Visit Progress & GMC Considerations:** • **Where Quality Visit processes** are in place, there is evidence of **progress** in meeting **some of the requirements and recommendations.** • **Regular progress reporting to the GMC will continue**.	**8**	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **moderate nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. • There are multiple sources of evidence, which are of a good quality. **Engagement & Action Plan Status:** • **The level of concern has escalated** due to inadequate investigation or action plan process or limited evidence of improvement. **Quality Visit Progress & GMC Considerations:** • **Regular progress reporting to the GMC will commence**.	• GMC oversight commences for risks which are rated at 8 and above.

High	**9**	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • A **robust action plan in place**. • It is either **too early to assess progress** or there are **early signs of the action plan** being implemented. **Quality Visit Progress & GMC Considerations:** • **Evidence of progress** against the requirements and recommendations, **including against <u>some of the more</u> significant concerns**. • The concern may remain in Enhanced Monitoring status with the GMC.	**10**	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • The **level of concern has escalated due to inadequate** investigation or action planning process or **limited evidence of improvement**. **Quality Visit Progress & GMC Considerations:** • The **GMC may issue a warning letter** about the potential for Enhanced Monitoring status to be applied in the absence of progress being made. • The GMC may decide to **immediately apply Enhanced Monitoring status**.	• **Targeted Visits are a common practice for high-risk concerns**. However, local management through gathering and responding to feedback should continue. • HEIW may consider resident withdrawal in some circumstances. • The GMC may consider applying Enhanced Monitoring status, conditions to training approval. Alternatively, training approval may be withdrawn.

	11	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • **Engagement** in developing solutions and an **action plan has been developed**. **Quality Visit Progress & GMC Considerations:** • **<u>Limited</u> evidence of progress** against the requirements and recommendations**, including against some of the <u>more</u> significant concerns**. • The concern may be in Enhanced Monitoring status with the GMC.	12	One or more of the following statements may apply. **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • The **implementation of the action plan may have fallen behind in one or more** areas or an area of significant concern**.** • The **level of concern has escalated due to inadequate** investigation or action planning process or **limited evidence of improvement**. **Quality Visit Progress & GMC Considerations:** • **HEIW will make specific contact with the GMC regarding the concerns and progress to date**. • The need for **Enhanced Monitoring** status will be considered by the GMC.	

	13	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • **Engagement** in developing solutions and an **action plan has been developed but** it is not fully implemented. **Quality Visit Progress & GMC Considerations:** • **Limited evidence of progress** against the requirements and recommendations regarding the **most severe concerns**. • There may be **very early signs of progress** on some of the **less severe issues**. • The concern may be in Enhanced Monitoring status with the GMC.	14	One or more of the following statements may apply. **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • **There are likely to be concerns around progress in implementing the action plan**. • There may be inadequate assurance that progress will be brought back on schedule. **Quality Visit Progress & GMC Considerations:** • The need for **Enhanced Monitoring** status will be considered by the GMC. • **Additional conditions to training approval will be considered by the GMC**.	

	15	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • **Engagement** in developing solutions, but an **action plan development is at an early stage** **Quality Visit Progress & GMC Considerations:** • **It is not possible to measure progress across key areas of concern**. • The concern is likely to remain in Enhanced Monitoring status with the GMC.	**16**	One or more of the following statements may apply: **Level of Concern:** • The concerns are of a **persistent or significant nature** which may have implications for **patient or resident safety**. • The concerns are having a **significant impact** on education & training delivery or the learning environment. **Engagement & Action Plan Status:** • **There are concerns around the ability** of the provider **to implement the action plan** within agreed timeframes. • There is **a lack of confidence that the plan will deliver** the required outcomes. • The concern may have been escalated as the **responses** received from the provider have been **inadequate or limited**. **Quality Visit Progress & GMC Considerations:** • The application of **Enhanced Monitoring** status is likely to have already been **applied**, or if not, it will be reconsidered. • **Additional conditions to training approval will be considered by the GMC** or approval may be **withdrawn**.	

Risk Reporting & Evaluation

All areas of concern are stored in a central database within HEIW together with their allocated risk rating. Risk reports are generated from this system and formally circulated to Local Education Providers and training programme leads on a triannual basis to provide transparency around the concerns being managed. When the reports are circulated, a request for an update will be included with a deadline for a response. Typically, responses should include the following types of information.

- Outcomes of local investigations. For example, where a meeting has been held with a department, resident doctors or trainers to discuss the concern a summary of the meeting notes may be provided. Alternatively, analysis of GMC National Training Survey results and reasons for the outcomes may be provided.
- Details of any action taken or planned, together with associated timelines for implementation.
- Details of any plans to monitor and associated dates.

Responses to risk reports will be reviewed alongside the existing evidence, and risk ratings will be adjusted as appropriate. Risk ratings are designed to be dynamic and will therefore be re-evaluated alongside any new information received outside of the routine risk reporting process. An overview of the typical factors which will increase and decrease the risk score are provided below.

Factors which may increase the risk rating:-

- Where additional evidence indicates that the level of concern has increased, e.g. there is more evidence, or the severity of the concern has increased.

- Where a concern has been monitored for a period of time, but insufficient information following local or training programme review has been made available.

- There is no evidence of an action plan being developed, or the action plan implementation has fallen behind.

Factors which may decrease the risk rating:-

- Further evidence is received which suggests that the concerns have been investigated and there are either no ongoing concerns or the concern has reduced in severity.

- An appropriate action plan has been received which is likely to address the concerns and there is reasonable confidence around the implementation of this action plan.

Training concerns will not be closed from the risk register until there is evidence that the concerns have been fully addressed and there is confidence around the sustainability of the solutions implemented.