

# Appendix 1 Audit Guide

The Guide must be used in the certification audit of Medical Locum Agencies for entry to the NSW Health Register of Medical Locum Agencies.

This document provides guidance to auditors and Medical Locum Agencies in the assessment of Medical Locum Agency compliance with the standards and conditions for the provision of Locum Medical Officers to NSW Public Health Organisations set out in the Medical Locum Agency Requirements. Examples of the evidence required to support a claim of compliance with each of the standards and conditions are set out below.

#### STANDARD / CONDITION **EVIDENCE** 1. Key business objectives The key objectives in establishing the policy framework for Interviews with Medical Locum Agency management the employment and management of Locum Medical and personnel indicate awareness of NSW Health key Officers by NSW Public Health Organisations are to: business objectives. maximise the effectiveness and efficiency of Locum Medical Locum Agency business plans and objectives Medical Officer employment and management reflect the NSW Health key business objectives. ensure that Locum Medical Officers are appropriately qualified, fit for duty and suitable for roles they will perform ensure the maintenance of agreed levels of service from Medical Locum Agencies to Public Health Organisations achieve value for money and establish processes for the certification, addition and/or removal of Medical Locum Agencies from the NSW Health Register. 2. Conditions for continuing registration

# 2.1 Professional association membership

A Medical Locum Agency must:

- be a member of:
  - the Association of Medical Recruiters Australia and New Zealand (AMRANZ) or
  - the Recruitment and Consulting Services Association Ltd (RCSA) or
  - the Association of Professional Staffing Companies (APSCo) Australia, or
- be able to demonstrate to the NSW Ministry of Health compliance with standards equivalent to the RCSA Code for Professional Practice, the APSCo Code of Conduct and the Commonwealth Code of Practice for the International Recruitment of Health Workers.
- AMRANZ, RCSA or APSCo membership certificate/s.
- Documentary evidence of standards of professional practice and conduct equivalent to those of the RCSA Code of Professional Conduct, the APSCo Code of Conduct and the Commonwealth Code of Practice for the International Recruitment of Health Workers.

#### 2.2 Insurance

A Medical Locum Agency must hold:

- a broad form public liability insurance policy of not less than fifteen million dollars (\$15,000,000) in respect of any one occurrence and twenty million dollars (\$20,000,000) in the aggregate
- a professional indemnity policy of insurance of not less than ten million dollars (\$10,000,000) in respect of any claim and twenty million dollars (\$20,000,000) in the aggregate
- workers' compensation insurance in accordance with applicable legislation in respect of all employees of the Medical Locum Agency.

Medical Locum Agency insurance certificates for:

- public liability insurance policy of not less than fifteen million dollars (\$15,000,000) in respect of any one occurrence and twenty million dollars (\$20,000,000) in the aggregate
- a professional indemnity policy of insurance of not less than ten million dollars (\$10,000,000) in respect of any claim and twenty million dollars (\$20,000,000) in the aggregate
- workers' compensation insurance in accordance with applicable legislation in respect of all employees of the Medical Locum Agency.



EVIDENCE			
2.3 Compliance with relevant legislation			
<ul> <li>The Agency's business policies and operational procedures reflect Commonwealth, State or Territory legislation and regulatory requirements.</li> <li>Work Health and Safety and Privacy policies.</li> <li>Business Continuity Plan.</li> <li>Interviews with agency personnel.</li> </ul>			
<ul> <li>Business Continuity Plan or equivalent.</li> <li>Interviews with agency management and personnel.</li> </ul>			
<ul> <li>Demonstration that the Medical Locum Agency utilises the electronic locum management system that is utilised by the Public Health Organisation for the employment and management of Locum medical Officers.</li> <li>A reasonable sample of randomly-selected records held by the Medical Locum Agency that demonstrates:         <ul> <li>the Medical Locum Agency responds to Orders to provide Locum Medical Officer cover 24 hours a day, 7 days per week including on weekends and Public Holidays</li> <li>the Medical Locum Agency makes every reasonable effort to fulfil Orders</li> </ul> </li> <li>A sample of responses to Orders across a range of times and within timeframes specified in the Orders.</li> <li>A survey of Public Health Organisations.</li> <li>Demonstration that the Medical Locum Agency has financial systems in place to ensure timely and accurate invoicing.</li> </ul>			
<ul> <li>A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate the Medical Locum Agency's accounting standards and practices.</li> <li>Samples that demonstrate record-keeping, security and accessibility of same.</li> </ul>			



#### STANDARD / CONDITION

#### **EVIDENCE**

### 2.7 Quality management systems, standards and practices

- 2.7.1 A Medical Locum Agency must maintain and utilise quality management systems and resources to process and document the placement of the Locum Medical Officers that:
- are appropriate for the size of the Medical Locum Agency
- support the provision of quality service
- are consistently implemented across all operations and
- · systematically managed with
  - a records management policy
  - performance and compliance policy, including 'arms-length' reviews, site visits and inspections where possible and appropriate
  - procedures to verify that duties as agreed on a particular day are carried out.
- 2.7.2 A Medical Locum Agency must:
- have a formal performance management system in place that obtains feedback on Locum Medical Officers.
- 2.7.3 A Medical Locum Agency must:
- adopt management practices, or develop its own management practice, based on recognised quality assurance systems, including certification to ISO 9001:2015 Quality Management Systems (as amended or replaced from time to time), which provides an internationally-recognised best-practice framework with a focus on monitoring performance and continuous improvement to ensure quality of products and service delivery.

- Business-specific quality management system that supports high quality service delivery to Public Health Organisations.
- A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate:
  - records management policy
  - o performance and compliance policy
  - o feedback from Medical Locum Agency staff
  - records of site visits / inspections
  - systems for customer feedback
- Documentary (electronic or paper) evidence of service delivery monitoring, reviews and surveys to obtain feedback on Locum Medical Officers' performance.
- Medical Locum Agency has achieved certification / accreditation against an appropriate quality standard or has adopted or developed its own management practices to the standards of recognised quality assurance systems, including ISO 9001:2015 Quality Management Systems (as amended or replaced from time to time).
- A continuous quality improvement framework.

## 2.8 Quality of Service

- 2.8.1 A Medical Locum Agency must ensure the provision of a high quality of service to NSW Public Health Organisations, including but not limited to:
- maintaining honesty and integrity
- ensure that its advertising for Locum Medical Officers is fair and adheres to the principles of truth in advertising
- keeping appointments with NSW Public Health Organisations
- responding promptly to any enquiries from NSW Public Health Organisations.
- Examples of Medical Locum Agency business policy, practices or procedures, mission statement and
  values.
- Interviews with Medical Locum Agency personnel.
- Samples of advertising on Medical Locum Agency website, other employment/recruitment websites and media.
- Feedback from a sample of Public Health Organisations.
- 2.8.2 A Medical Locum Agency must provide Locum Medical Officers that:
- are professional, efficient, courteous and respectful to staff, patients and visitors to NSW Public Health Organisations
- are capable of delivering quality health care
- present in a neat and professional manner
- agree to comply with the NSW Health PD2015\_049 Code of Conduct.
- Examples of business policy, practices or procedures, mission statement and values
- Feedback from a sample of Public Health Organisations
- Effective Medical Locum Agency complaints management policies and procedures that:
  - facilitate reporting of concerns by Public Health Organisations about the performance of Locum Medical Officers
  - ensure that Locum Medical Officers who have been the subject of complaints in one NSW Public Health Organisation are not placed in another.



STANDARD / CONDITION	EVIDENCE		
2.8 Quality of Service			
2.8.2 continued	<ul> <li>Records that indicate Locum Medical Officers are familiar with the NSW Health PD2015_049 Code of Conduct and agree to comply with the Code of Conduct when working within NSW Health</li> </ul>		
2.9 NSW Public Health Organisation/Medical Locum Agency agreement			
A Medical Locum Agency must have a completed agreement with each Public Health Organisation to which it provides Medical Locum Officers. NSW Public Health Organisations may negotiate and include specific conditions of business not inconsistent with the terms of the NSW Health Standard Agreement for the Employment of Locum Medical Officers in NSW Public Health Organisations (Appendix B to Policy).	A signed and dated single agreement with each NSW Public Health Organisation to which the Agency provides Locum Medical Officers.		
3. Management of Locum Medical Officers			
3.1 General requirements			
A Medical Locum Agency must:	<ul> <li>A database of experienced and appropriately-qualified Locum Medical Officers</li> <li>All Locum Medical Officers on the database have undergone pre-placement checks and credentialing as described at 3.2 below.</li> </ul>		
3.2 Pre-placement checks and credentialing			
3.2.1 Before adding a Locum Medical Officer to its roll, a Medical Locum Agency must conduct a recruitment interview, and carry out due diligence in accordance with the requirements of the NSW Health PD2019_006  Employment and Management of Locum Medical Officers by NSW Public Health Organisations and other relevant NSW Health policies as amended from time, undertaking pre-placement checks and credentialing to ensure that the Locum Medical Officer:  is suitably registered with the Medical Board of Australia  holds valid permits to work in Australia and the appropriate visa to work at multiple work sites  provides photo identification.	<ul> <li>A reasonable sample of randomly-selected records held by the Medical Locum Agency that demonstrates an initial recruitment interview is conducted by the Medical Locum Agency with Locum Medical Officers.</li> <li>An audit of a sample of randomly-selected Medical Locum Agency records that demonstrate that before adding a Locum Medical Officer to its roll, the Medical Locum Agency conducts due diligence in line with the requirements of these Requirements, and:         <ul> <li>checks the Medical Board of Australia for registration status</li> <li>checks the validity of permits and visas to work at multiple work sites</li> <li>obtains photo identification</li> </ul> </li> </ul>		
3.2.2 Once a Locum Medical Officer is added to the roll of a Medical Locum Agency, and before the Locum Medical Officer can be put forward for a placement in a NSW Public Health Organisation, several checks must be carried out. Document 1: Locum Medical Officer Pre-Placement Checklist must be completed and signed by the Locum Medical Officer to confirm that the Locum Medical Officer has: undergone a National Criminal Record Check and a Working with Children Check consistent with NSW Health PD2019_003 Working with Children Checks and Other Police Checks	A reasonable sample of randomly-selected records held by the Medical Locum Agency that demonstrates Document 1: Locum Medical Officer Pre-Placement Checklist is completed for each Locum Medical Officer, and that all Locum Medical Officers:		



STANDARD / CONDITION	EVIDENCE
3.2 Pre-placement checks and credentialing	
<ul> <li>completed a Statutory Declaration of any convictions or pending charges since the date of their national Police Certificate</li> <li>completed Document 2.1: Clinical Skills Self-Assessment and undergone one Referee Check for Clinical Skills (Document 2.2) and three Referee Checks for Professional Behaviour (Documents 2.3, 2.4 and 2.5), including one from a recent supervisor or department head</li> <li>undergone screening and vaccination as in accordance with PD 2018_009 Occupation al Assessment, Screening &amp; Vaccination Against Specified Infectious Diseases, providing documentary evidence of such screening</li> <li>completed the NSW Health mandatory online training and orientation for Locum Medical Officers, providing to the Medical Locum Agency a copy of a certificate of completion</li> <li>been informed that they may be required to work in a smaller regional/rural facility where skills at specialist level and/or work with minimal supervision may be an important factor</li> <li>been informed that they may be required to supervise Junior Medical Officers, and</li> <li>is mentally and physically able to perform the services for which they are engaged and able to perform an assignment in accordance with the accepted medical practice and direction of the NSW Public Health Organisation.</li> </ul>	<ul> <li>have completed a Statutory Declaration of any convictions or pending charges since the date of their national Police Certificate</li> <li>have completed Document 2.1: Clinical Skills Self-Assessment and undergone one Referee Check for Clinical Skills (Document 2.2) and three Referee Checks for Professional Behaviour (Documents 2.3, 2.4 and 2.5), including one from a recent supervisor or department head</li> <li>have undergone screening and vaccination in accordance with NSW Health PD2018_009 Occupational Assessment, Screening &amp; Vaccination Against Specified Infectious Diseases. Documentary evidence of such screening</li> <li>have completed the NSW Health mandatory online training and orientation for Locum Medical Officers, and provided to the Medical Locum Agency a copy of a certificate of completion</li> <li>are aware that they may be required to supervise Junior Medical Officers</li> <li>have been informed that they may be required to work in a smaller regional/rural facility where skills at specialist level and/or work with minimal supervision may be an important factor; and</li> <li>are mentally and physically able to perform the services for which they are engaged and</li> <li>are able to perform an assignment in accordance with the accepted medical practice and direction of the NSW Public Health Organisation.</li> </ul>
3.2.3 If the doctor is an international medical graduate/ overseas doctor, a Medical Locum Agency must obtain documentary evidence of police clearance from any country in which the doctor has been a citizen or resident since the age of 16. If such documentation is not available, the doctor must complete a Statutory Declaration of same in accordance with NSW Health PD2019_003 Working with Children Checks and Other Police Checks	A reasonable sample of records held by the Medical Locum Agency in respect of international medical graduates/overseas doctors that demonstrates:
3.2.4 If the doctor is or has been a NSW Health employee, a Medical Locum Agency must obtain documentary evidence of approval to undertake secondary employment.	A reasonable sample of records held by the Medical Locum Agency in respect of Locum Medical Officers who are or have been NSW Health employees that provide documentary evidence of Locum Medical Officers' approval to undertake secondary employment.
3.2.5 If the Locum Medical Officer is or has previously been a NSW Health employee, a Medical Locum Agency must inform them that a NSW Health internal service check will be conducted by the NSW Public Health Organisation in which they may be placed, consistent with NSW Health PD2013_036 Service Check Register for NSW Health.	A reasonable sample of records held by the Medical Locum Agency in respect of Locum Medical Officers who are or have been a NSW Health employees that provide evidence that such Locum Medical Officers are advised that a NSW Health internal service check will be conducted by the NSW Public Health Organisation in which they may be placed.



STANDARD / CONDITION	EVIDENCE
3.2 Pre-placement checks and credentialing	
3.2.6 A Medical Locum Agency may only put forward a Locum Medical Officer for a placement in a NSW Public Health Organisation having completed pre-placement checks and credentialing. <i>Document 1: Locum Medical Officer Pre-Placement Checklist</i> and supporting documentary evidence must be provided to a NSW Public Health Organisation in response to an Order.	A reasonable sample of records held by the Medical Locum Agency that show Document 1: Locum Medical Officer Pre-Placement Checklist and supporting documentary evidence is provided by the Medical Locum Agency to a NSW Public Health Organisation in response to an Order.      Feedback from NSW Public Health Organisations.
3.3 Conditions and restrictions on Locum Medical Office	ers
3.3.1 A Medical Locum Agency must ensure that a NSW Public Health Organisation is notified in advance of any Locum Medical Officer who has any conditions placed on their registration.	<ul> <li>An audit of a reasonable sample of randomly-selected medical locum agency records showing procedures that demonstrate the Medical Locum Agency checks Locum Medical Officers' registration status at interview and on a regular basis.</li> <li>A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate that a NSW Public Health Organisation is notified in advance of a Locum Medical Officer who has any conditions placed on their registration.</li> <li>Appropriate communication processes are in place between the Medical Locum Agency and NSW Public Health Organisations.</li> </ul>
3.3.2 A Medical Locum Agency must not propose a Locum Medical Officer for a role that would contravene conditions placed on their registration.	A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate that a Locum Medical Officer is not proposed for a role that would contravene conditions placed on their registration
3.3.3 A Medical Locum Agency must withdraw a Locum Medical Officer as soon as it becomes aware of a change in their registration status such that to continue a placement in a NSW Public Health Organisation would contravene conditions imposed by the Medical Board of Australia.	Policy, procedures and/or a reasonable sample of randomly-selected records showing that a Medical Locum Agency would withdraw a Locum Medical Officer as soon as it became aware of a change in their registration status such that to continue a placement in a NSW Public Health Organisation would contravene conditions imposed by the Medical Board of Australia.
3.3.4 The Medical Locum Agency must advise a Locum Medical Officer that, if they become aware of any conditions placed on their registration during the course of a placement, or otherwise, the Locum Medical Officer must immediately inform both the Medical Locum Agency and the nominated officer in the Public Health Organisation of such conditions.	A reasonable sample of randomly-selected Medical Locum Agency records to demonstrate that Locum Medical Officers are aware of their responsibilities to advise the Medical Locum Agency and the nominated officer in the Public Health Organisation of any registration conditions placed on their registration during the course of a placement, or otherwise.
3.3.5 The Medical Locum Agency must advise the nominated officer in the Public Health Organisation as soon as it becomes aware that a Locum Medical Officer who is currently placed in the Public Health Organisation has such registration conditions.	A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate that:     the Medical Locum Agency advises the nominated officer in the Public Health Organisation as soon as it becomes aware that a Locum Medical Officer who is currently placed in the Public Health Organisation has any registration conditions     the Medical Locum Agency has up-to-date contact lists for nominated officers in the Public Health Organisations.



#### **STANDARD / CONDITION EVIDENCE** 3.3 Conditions and restrictions on Locum Medical Officers 3.3.6 The Medical Locum Agency must advise the Locum A reasonable sample of randomly-selected Medical Medical Officer that if the Locum Medical Officer is Locum Agency records that demonstrate that the suspended or terminated from their usual duties in a Medical Locum Agency advises Locum Medical hospital, the Locum Medical Officer must immediately Officers that if they are suspended or terminated from inform the Medical Locum Agency and the nominated their usual duties in a hospital they must immediately officer in the Public Health Organisation. inform the Medical Locum Agency and the nominated officer in the Public Health Organisation. 3.3.7 The Medical Locum Agency must advise the A reasonable sample of randomly-selected Medical nominated officer in the Public Health Organisation as soon Locum Agency records that demonstrate that the as it becomes aware that a Locum Medical Officer who is Medical Locum Agency advises the nominated officer currently engaged in the Public Health Organisation has in a Public Health Organisation as soon as it becomes been suspended or terminated from their usual duties in a aware that a Locum Medical Officer who is currently hospital. engaged in the Public Health Organisation has been suspended or terminated from their usual duties in a hospital 3.3.8 The nominated officer in the NSW Public Health A reasonable sample of randomly-selected Medical Organisation may advise the Medical Locum Agency of the Locum Agency records to demonstrate that Medical acceptability of a Locum Medical Officer who has any Locum Agency management and personnel are aware conditions placed on their registration by the Medical Board that the nominated officer in the Public Health of Australia for a placement. Organisation may advise the acceptability of a Locum Medical Officer who has any conditions placed on their registration by the Medical Board of Australia for a placement 3.4 Current employment and secondary employment A Medical Locum Agency must ensure that: A reasonable sample of randomly-selected Medical the Locum Medical Officer discloses all current Locum Agency records that demonstrate that Locum employment to the Medical Locum Agency Medical Officers are made aware that they must disclose all current employment to a Medical Locum the Locum Medical Officer has notified the relevant Agency and must notify their employer of their body or organisation in which they are employed of their intention to register with the Medical Locum intention to register with a Medical Locum Agency. A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate details of where the Locum Medical Officer is an existing employee within NSW Health, the Locum Medical Locum Medical Officers' current employment details Officer must provide documentary evidence of and secondary employment approval documents are recorded. approval for secondary employment from the relevant Chief Executive or delegate. See Document A reasonable sample of randomly-selected Medical 3: Approval for Secondary Employment as an Locum Agency records that demonstrate that the example Locum Medical Officers' current employment arrangements are considered and potential conflicts of the Locum Medical Officer's current employment arrangements do not create potential conflicts of interest and work health and safety risks, or risks to interest, work health and safety risks, or risks to the the quality of patient care are assessed. quality of patient care during a placement in a Public Health Organisation. 3.5 Safe working hours

A Medical Locum Agency must monitor Locum Medical Officers' hours of work, as far as is practicable, to ensure that:

- safe working hours and principles are followed when placing Locum Medical Officers in any NSW Public Health Organisation and
- Locum Medical Officers abide by the relevant sections of the NSW Health PD2015\_049 Code of Conduct.
- A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate policies and procedures are in place to promote and manage safe working hours and prevent fatigue.
- Notes on Locum Medical Officer records that demonstrate an assessment of hours worked against relevant safe working hours policy/guidelines including the NSW Health PD2015\_049 Code of Conduct.



STANDARD / CONDITION	EVIDENCE	
4. Orders and Confirmed Orders		
4.1 Orders		
On receipt of an Order a Medical Locum Agency must:  respond to the Order within the specified timeframe  supply Locum Medical Officers with the details of the Order, including the Role Specification, location and period of engagement, date/s, time/s, required skills and experience.	A reasonable sample of randomly-selected Medical Locum Agency records that demonstrates: Order-tracking protocols, including priority ratings, status, actions against Orders response-time documentation procedures for feedback to Public Health Organisations regarding the status of Orders.  A reasonable sample of randomly-selected records that demonstrate the Medical Locum Agency: matches Locum Medical Officers' shift preferences/availability with Order specifications. provides Locum Medical Officers with the details of the Order, including the Role Specification, location and period of engagement, date/s, time/s, required skills and experience.	
4.2 Confirmed Orders		
<ul> <li>4.2.1 On receipt of a Confirmed Order a Medical Locum Agency must:</li> <li>ensure that once booked, a Locum Medical officer commits to the placement and is not offered an alternative placement by the Medical Locum Agency</li> <li>provide to the Locum Medical Officer a Pre-Placement Information Pack (see Document 6: Pre-Placement and Orientation Packs) to assist the Locum Medical Officer with all relevant information in preparation for the placement</li> <li>supply the Locum Medical Officer named in the acceptance of the Order</li> <li>ensure that the Locum Medical Officer presents for the placement at the appointed time to the designed site contact and provides photo ID and any other required documentation.</li> </ul>	A reasonable sample of randomly-selected Medical Locum Agency records that demonstrate:         ocommunication between the Medical Locum Agency and Locum Medical Officers demonstrating that the Locum Medical Officers who are placed under a Confirmed Order commit to the shift or placement and are aware that they must present for the shift or placement to the designated site contact and provide photo ID.         othe Medical Locum Agency provides the Locum Medical Officer named in the Confirmed Order with details specified in an Order, and a Pre-Placement Pack.         ould replace the Public Health Organisations are supplied with supporting documents to a Confirmed Order, such as photo identification of the Locum Medical Officer         ocommunication between the Medical Locum Agency and Locum Medical Officers that ensures that they present for placements at the appointed time, providing photo ID and any other required documentation.	
4.2.2 A Medical Locum Agency must be aware that no fee or commission is paid to an agency whose Locum Medical Officer fails to present for a placement at the agreed time and place.	<ul> <li>Medical Locum Agency protocols or procedures reflect terms and conditions of agreements with Public Health Organisations regarding the failure of a Locum Medical Officer to fulfil a placement.</li> <li>Financial records show fees/commission is not claimed for unfulfilled placements.</li> </ul>	
4.2.3 A Medical Locum Agency that has proposed a Locum Medical Officer for a specified placement at a NSW Public Health Organisation is not entitled to a placement fee or part fee if the Locum Medical Officer is selected for the specified placement through another Medical Locum Agency.	<ul> <li>Medical Locum Agency protocols or procedures reflect terms and conditions of agreements with Public Health Organisations regarding eligibility for fees/commission.</li> <li>Medical Locum financial records show a fee/commission is not claimed for placements made by other Medical Locum Agencies.</li> </ul>	



STANDARD / CONDITION	EVIDENCE	
4. Orders and Confirmed Orders		
4.2 Confirmed Orders		
4.2.4 A Medical Locum Agency may not make a claim for a placement (in full or part) if the Locum Medical Officer is proposed by the Medical Locum Agency but is placed in a shift by the Public Health Organisation that is the Locum Medical Officer's primary employer.	<ul> <li>Medical Locum Agency protocols or procedures reflect terms and conditions of agreements with Public Health Organisations regarding eligibility for fees/commission.</li> <li>Medical Locum financial records show fees/commission is not where Locum Medical Officers are placed a shift by the Public Health Organisation that is their primary employer.</li> </ul>	