

PMAQ

Notification of concern

QH-GDL-004

1. Statement

Prevocational Medical Accreditation Queensland (PMAQ) is committed to the delivery of fair, impartial and transparent accreditation system that assures and promotes quality education and training for prevocational doctors, providing for their wellbeing, the provision of safe patient care and training that meets the health needs of the community.

PMAQ is accredited by the Australian Medical Council as a prevocational training accreditation authority. The Medical Board of Australia (MBA) has approved PMAQ to accredit prevocational year one training programs and the health chief executive forum has endorsed the accreditation of prevocational year two training programs.

The National Framework for Prevocational (PGY1 and PGY2) Medical Training (the framework) determines the standards and requirements with which both PGY1 and PGY2 prevocational training programs must meet. These are defined in the National Standards for Prevocational (PGY1 and PGY2) Training Programs and Terms (the National Standards). Specific to the PGY1 year, these standards require programs to meet the requirements of the Medical Board of Australia's (MBA's) [Registration standard: Granting general registration as a medical practitioner to Australian and New Zealand medical graduates upon completion of postgraduate year one training, which](#) (the registration standard) defines the requirements for eligibility for general registration on completion of the PGY1 year.

PGY2 doctors who undertake training within an accredited PGY2 training program are exempt from the MBA's Registration Standard: Continuing professional development. On successful completion of the PGY2 program requirements, PGY2 doctors are eligible to receive a certification of completion.

Accredited prevocational training providers are responsible for the standard of the prevocational training program overall and its ongoing compliance with the standards. PMAQ, however, monitors accredited providers throughout their period of accreditation to ensure ongoing compliance and support quality improvement. A number of processes support this monitoring function, with a key process being the ability of interested parties to raise concern in relation to a program's compliance.

2. Purpose

The notification of concern procedure describes the process for any party concerned that an accredited prevocational training provider may not be meeting any component of the National Standards for Prevocational (PGY1 and PGY2) Training Programs and Terms against which they are accredited. The actions to be taken by PMAQ in response to receipt of such information are also described and purposefully designed to afford procedural fairness and natural justice.

3. Scope

This guideline applies to all accredited prevocational training providers (inclusive of their partner facilities and sites) in Queensland that deliver prevocational medical training programs.

4. Context

4.1 Definition of concern

Concerns are expressions of apprehension or dissatisfaction made to PMAQ about any aspect of an accredited prevocational training program, either PGY1, PGY2, or both, and its compliance with the national standards.

This includes but is not limited to:

- issues relating to the content of training provided to prevocational doctors.
- issues relating to the management of the prevocational training program, including issues with staff; or
- issues relating to patient or prevocational doctor care and safety.

4.2 Who can raise a concern?

Concerns may be raised by prevocational doctors, their advocates, staff from training providers, external agencies, consumers, or consumer organisations. PMAQ prefers they are made by an identified individual. The identity of the complainant will be kept confidential by PMAQ.

PMAQ will seek as much information as possible from the complainant and may also request information from the training provider involved. If PMAQ determines that the concern will not be investigated further, both parties will be informed of the decision. However, concerns may still be documented and considered during future accreditation assessments or reviews. Individuals considering lodging a notification of concern are encouraged to contact PMAQ directly. This can be done by calling the Manager, PMAQ, or another member of the PMAQ team.

PMAQ supports early and local resolution of concerns wherever possible. Before submitting a notification of concern, individuals are advised to first contact the Director of Clinical Training, a representative from the provider's medical education unit, or a member of the provider's leadership team. Local resolution is often the most efficient and effective approach. If local resolution is not possible or the matter remains unresolved to the complainant's satisfaction, the concern may then be submitted to PMAQ in writing.

Notifications of concern to PMAQ may be submitted through the following channels:

- by email to pmaq@health.qld.gov.au
- by email to a member of the PMAQ team.
- by post to PO Box 48, Brisbane QLD 4001

4.3 Concerns identified during an accreditation assessment

Members of PMAQ accreditation assessment teams may raise concerns during accreditation assessments. In most cases these concerns are managed through the accreditation assessment process, or if outside the scope of the national standards, referred to the training provider's executive for further management.

At times, PMAQ becomes aware of circumstances at an accredited prevocational training provider that present a significant risk to patient safety or the wellbeing of prevocational doctors during an accreditation assessment.

When this occurs, the PMAQ accreditation assessment team must immediately:

- notify the chief executive responsible for the accredited training program together with recommendations for the appropriate remedial actions to be taken and the timeframe for this; and
- notify the chair, PMAQ accreditation committee that the concern has been raised.

The accreditation committee may then, at their discretion, seek immediate remedy from the provider, notify the department of health or provide recommendations for action where the provider's actions have proven to be inappropriate or inadequate to remedy the risks within an appropriate timeframe.

4.4 Concerns raised with a PMAQ accreditation assessor or accreditation committee member

Accreditation committee members may be directly approached with the intent to advise of a concern. In this situation the committee member should abstain from eliciting specific details or providing advice in relation to the concern and should direct the complainant to contact PMAQ directly via email, phone or in person.

5. Assessment of concerns

Notifications of concerns received outside a scheduled accreditation assessment will be managed as follows.

5.1 Initial assessment

PMAQ will:

- acknowledge and register the concern within five (5) working days.
- clarify issues with the individual(s) raising the concern, and if within the scope of the national standards, gain as much information as possible about the circumstances. If the concern is outside the scope of the national standards, advice will be provided to the individual(s) on alternate pathways to address the concern.
- explain to the individual(s) raising the concern the process for the management of concerns.
- inform the Chair, PMAQ accreditation committee of the concern and subsequently the committee; and
- notify the training provider of the concern in writing.

5.2 Responding to the concern raised

The PMAQ accreditation committee may decide to take no further action, seek additional information, or take immediate action. Irrespective of the committee's decision, the training provider's executive will be notified that a formal notification of concern has been received, along with the committee's decision regarding the course of action.

If the PMAQ accreditation committee determines that further action or additional information is required, it will:

- notify the relevant training provider's executive of the concern and seek a response.
- review the information available about the notification of concern, assessing:
 - the impact on prevocational doctor safety, patient safety, or the provision of patient care.
 - the severity and likelihood of the issue, including whether the concern has previously been raised.

- the impact the issue has had or may have on the delivery of the prevocational training program (PGY1, PGY2, or both); and
- the relationship of the issue to the national standards.
- seek an initial response from the provider and determine the timeframe for this response; and
- take any further immediate action required pending the provider's response.

Following receipt of the training provider's response, the accreditation committee will:

- evaluate the appropriateness of the provider's response to the notification.
- assess whether the response demonstrates ongoing compliance with the national standards and requirements.
- determine the provider's capacity to implement timely, sustainable, and effective strategies to prevent or address any negative consequences resulting from the change.
- review evidence demonstrating that the national standards continue to be met. If there has been any deviation from the standards, assess how the provider identified the issue and the actions taken to address it.
- ensure that the issues raised fall within the remit of PMAQ as defined by the National Framework for Prevocational (PGY1 and PGY2) Medical Training; and
- evaluate the effectiveness of PMAQ's response to the concern raised.

5.3 No further action

If the accreditation committee determines that no further action is required, it will:

- inform the individual(s) who raised the concern, as well as the relevant provider, of the decision and the reasons for it.
- record the details of the concern for future reference; and
- ensure that the issues raised are considered during future accreditation assessments.

5.4 Further action required

If the accreditation committee determines that further assessment of a concern is necessary, PMAQ will identify and implement the most appropriate course of action in accordance with its established accreditation processes.

5.5 Finalising a concern

The accreditation committee will:

- inform the individual(s) who raised the concern that the response has been finalised.
- advise the provider in writing of the findings, outcome, and confirmation that the concern has been finalised; and
- notify the provider of their rights and the process for seeking a review.

6. Notifications that are ‘out-of-scope’

Notifications of concern that fall outside the scope of PMAQ’s responsibilities will, with the consent of the individual raising the concern, be redirected to the appropriate agency for management.

7. Timeframes for responding to concerns

All concerns will be acknowledged within five (5) working days of receipt. Most concerns are expected to be resolved within sixty (60) working days; however, complex matters may require additional time to reach finalisation.

8. Definitions

Term	Definition
DCT	Director of clinical training
DMS	Director of medical services
EDMS	Executive director of medical services
Evaluation	Evaluation is the process of using the measurements (data) to assess outcomes and impact of an entity (individual, service, program). It is the formal process of gathering evidence (data), reviewing it and using those measures to assess the outcomes and impact of a program or project according to terms of reference or established standards.
External data source	A data source external to the training program, it’s hospital or health service. The national standards require the use of both internal and external data sources in its evaluation and monitoring activities. An example is the Medical Board of Australia’s medical training survey results.
Formal education program	An education program the facility provides and delivers as part of the prevocational training program curriculum. Sessions are usually weekly and involve a mixture of interactive and skills-based face-to-face or online training.
PGY1	A doctor in their first year of postgraduate training, holding provisional registration with the Medical Board of Australia. Also referred to as an intern.
PGY2	A doctor in their second year of postgraduate training, holding general registration with the Medical Board of Australia.
Junior house officer (JHO)	A prevocational doctor who holds general registration by the Medical Board of Australia, usually but not always in their second postgraduate year (PGY2) and who has not yet been accepted onto a college training pathway. Also referred to a resident or a resident medical officer.
Prevocational training program	PGY1: A 47-week period of mandated, supervised, work-based

	<p>clinical training that must meet both the requirements of the Medical Board of Australia's registration standard <i>Granting General Registration as a Medical Practitioner to Australian and New Zealand Medical Graduates on Completion of Postgraduate Year One Training and the parameters outlined in the National Requirements for Prevocational Training Programs and Terms</i>. This includes exposure to required clinical experiences, participation in a longitudinal assessment process, and access to education and training opportunities. An assessment review panel will make a recommendation on eligibility for progression to general registration. The training program may be delivered by one or more accredited training providers.</p> <p>PGY2: A 47-week period of mandated, supervised, work-based clinical training that must meet the parameters outlined in the <i>National Requirements for Prevocational Training Programs and Terms</i>. This includes exposure to required clinical experiences, participation in a longitudinal assessment process, and access to education and training opportunities. An assessment review panel will determine eligibility to receive a certificate of completion. The training program may be delivered by one or more accredited training providers.</p>
MEO	Medical education officer
PMEO	Principal medical education officer
MEU	<p>Medical education unit</p> <p>The primary function of the medical education unit is to oversee prevocational medical training and associated accreditation activities.</p>
Monitoring	The process of measuring of what is happening. It is the periodic collection of data and information (measures) for the purposes of tracking progress (measuring) of an entity (individual, service, program) according to terms of reference or established standards.
PGY	<p>Postgraduate year usually used with a number to indicate the number of years after graduation from medical school.</p> <p>For example, PGY1 is the first postgraduate year, also known as internship.</p>
Prevocational	A prevocational doctor in the postgraduate years prior to being accepted onto a college pathway.
Quality improvement (QI)	The framework used to provide for a systematic, formal approach to the analysis of practice or program performance and efforts to improve performance, including the implementation of changes in practice if needed.
Term	A component of a medical training program, usually a nominated number of weeks in a particular area of practice.

	Also called clinical rotation, post or placement.
Triangulation	The process of using different sources and/or methods for data collection to cross check data, reduce bias, and ensure data is valid, reliable and complete. This process lends credibility to an evaluation or assessment process.

9. Approval and implementation

Policy Custodian	Policy Contact Details	Approval Date	Approver
Manager, PMAQ	pmaq@health.qld.gov.au	04 August 2025	PMAQ Accreditation Committee

10. Version control

Version	Date	Comments
0.1	21 May 2020	Initial draft
0.2	1 October 2020	Endorsed by Accreditation Committee
1.0	28 October 2020	Approved by the DDG prevention division
2.0	13 September 2024	Updated to reflect changes resulting from implantation of the <i>National framework for prevocational (PGY1 and PGY2) Medical Training</i> . Approved by the ADDG workforce strategy branch, clinical planning & service strategy division
3.0	4 August 2025	Endorsed by Accreditation Committee