



Pre-Engagement Integrity Check Procedure: Contracted Medical Practitioners

This procedure supports the application of [MP 0079/18 Engagement of Medical Practitioners Under Contracts for Services Policy](#).

1. Introduction

A Contracted Medical Practitioner (CMP) is engaged directly by a Health Service Provider (HSP) to provide medical services to patients in a public health care facility. CMPs are engaged under contracts for service known as a Medical Services Agreement (MSA). The [MP 0079/18 Engagement of Medical Practitioners Under Contracts for Service Policy](#) regulates and ensures uniform terms of engagement of CMPs by HSPs.

A CMP is a member of the clinical staff of a HSP at the Health Care Facility at which medical and other services are provided. A CMP is not an employee, nor are they considered a “preferred applicant” as defined in the [MP 0126/19 Pre-Employment Integrity Check Policy](#) (PEIC Policy). On this basis, a CMP is not subject to a Pre-employment Integrity Check (PEIC) for integrity concerns that may have arisen during previous employment or engagement within the WA health system.

An individual within the WA health system is registered in the System Manager Case Management System (CMS) when they have been subject to discipline/disputes process where the matter concerned a serious risk to the safety or protection of patients, staff, or a WA health entity.

As part of the PEIC process, the CMS is accessed to identify any recorded breaches of discipline against the individual.

There may be an integrity risk to the WA health system, where a CMP has been registered within the CMS during their previous employment or engagement within the WA health system, and they seek a further engagement within the WA health system

To mitigate this risk, a HSP must initiate a Pre-Engagement Integrity Check (Pre-EIC) for all individuals prior to their engagement under an MSA.

This procedure must be read in conjunction with the PEIC policy.

2. Pre-Engagement Integrity Check

The HSP must advise the individual that the engagement under an MSA will be subject to several verifications and checks, including an integrity check.

In conducting the Pre-EIC, the HSP must ensure that decision making is transparent, affords procedural fairness, is capable of review and complies with all record keeping requirements.

HSPs must also maintain an appropriate level of confidentiality throughout the Pre-EIC process.

When conducting a Pre-EIC of a prospective CMP, a HSP must take the following steps:

Step 1	<p>Search for the individual in the Corporate Governance Database (CGD).</p> <p>The search fields in the CGD requires an exact match. An individual's first name, surname and date of birth must be entered accurately and in full (there is no 'wildcard' option). Multiple searches for an individual should be made as they may be known by other names. Common variations of searches include:</p> <ul style="list-style-type: none"> • Searching by family name • Searching by middle name as the first name • Searching for common alternative spellings (e.g. John; Jon; Johnathon; Jonathon) • Searching for variations on a hyphenated surname (e.g. Smith-Bloggs; Smith/Bloggs).
---------------	--

Step 2	If a record is found	OR	If no record is found
	Go to Step 3		End of Pre-EIC process; HSP may continue the process of onboarding

Step 3	HSP must suspend the process of onboarding.
---------------	---

Step 4	Inform the System Manager via System-Wide Integrity Services in writing of the possible match being found in the CGD.
---------------	---

Step 5	The System Manager must provide information relevant to the individual's eligibility for engagement to the HSP for consideration.
---------------	---

Step 6	The HSP must advise the individual of the information obtained through the Pre-EIC in writing and afford them an opportunity to respond to the information within five working days.
---------------	--

Step 7	Based on the individual's response, the HSP must, as soon as reasonably practicable, decide whether to proceed with the individual's engagement.
---------------	--

Step 8	If the decision is to not to proceed with the engagement, the HSP must inform the individual in writing outlining the reasons for the decision.	OR	If the decision is to proceed with the engagement, the HSP must respond to any risks arising from the information received and implement strategies to mitigate that risk(s).
---------------	---	----	---

Step 9	<p>The HSP must inform the System Manager in writing of the outcome of the engagement process.</p> <p>Pre-EIC process ends</p>
---------------	---

Step 10	Resume on boarding of the individual (if applicable)
----------------	--

Refer to Appendix 1 for the Pre-Engagement Integrity Check Process Diagram.

3. Definitions

Contracted Medical Practitioner: A medical practitioner engaged by a Health Service Provider under a Medical Service Agreement to provide medical and other services in a Health Care Facility.

Corporate Governance Database: Database governed by the System Manager. Restricted access is provided to nominated employees to search for an individual to determine if there is an existing case in the System Manager Case Management System.

Department CEO: The chief executive officer (Director General) of the Department of Health.

Health Care Facility: A place or places (however titled) in which a medical practitioner undertakes clinical practice including, but not limited to, a hospital, a mental health facility or community health service under the control of a Health Service Provider.

Integrity: The expected standards of behaviour and actions of Department of Health employees and HSP staff members which reflect honesty, accountability, transparency, impartiality, and acting with care and diligence.

Medical Services Agreement: A contract for services for the provision of medical services between a medical practitioner and a Health Service Provider.

Pre-employment Integrity Check: A process that supports and assists in the maintenance of professional standards, including appropriate standards of conduct and to assist in determining a preferred applicant's eligibility for employment within a WA health entity.

Preferred applicant: A candidate selected as suitable and recommended for the advertised role.

Staff member: In relation to a Health Service Provider and pursuant to section 6 of the *Health Services Act 2016* (HS Act) means:

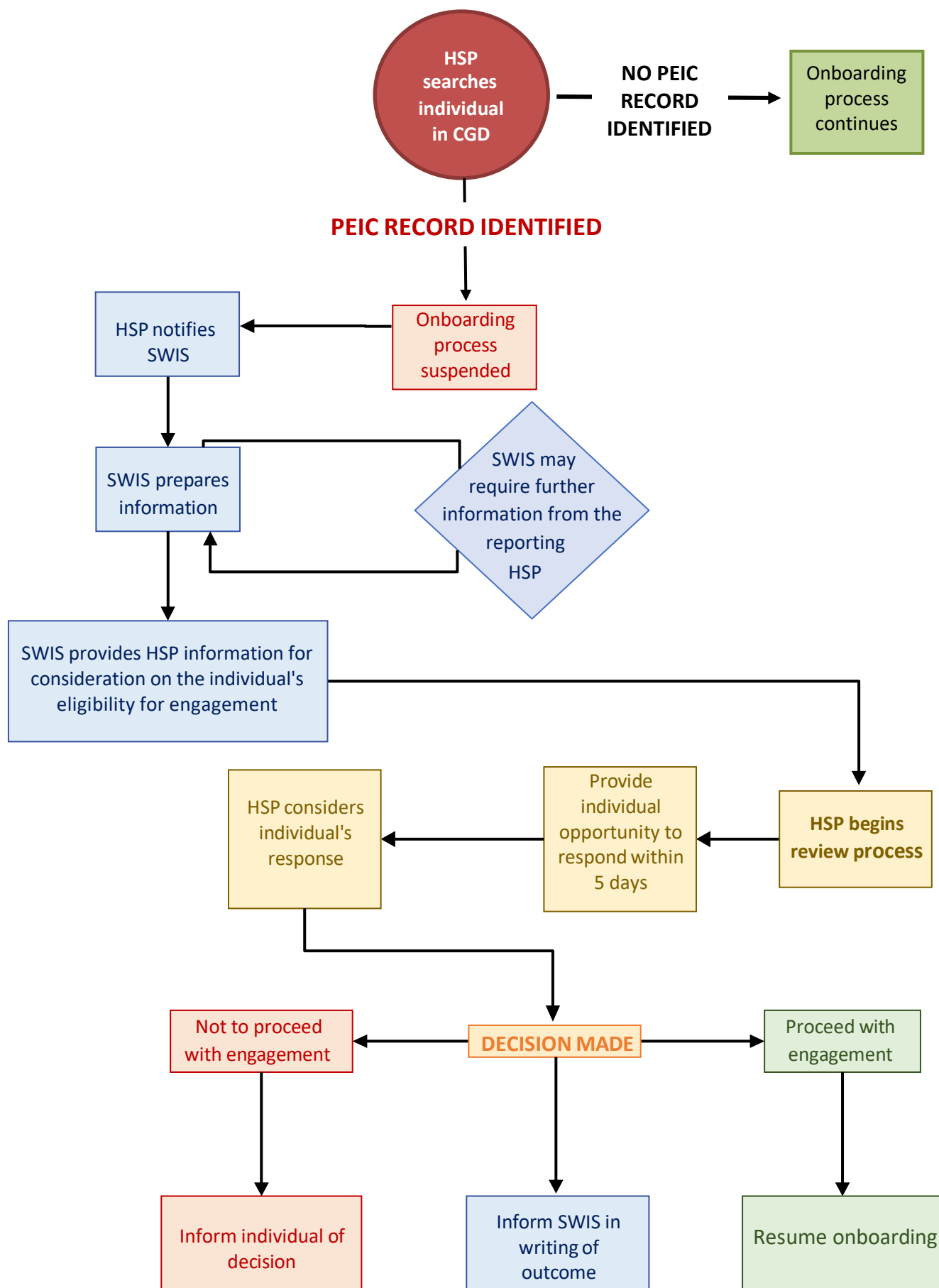
- (a) An employee in the Health Service Provider; and/or
- (b) A person engaged under a contract for services by a Health Service Provider.

Note: Staff member includes a contracted medical practitioner engaged under a medical services agreement.

System Manager: System-Wide Integrity Services on behalf of the Department CEO.

System Manager Case Management System: The database administered by the System Manager provided to the Health Service Providers to enter, track and report cases of conduct that may concern a breach of discipline.

Pre-Engagement Integrity Check: Contracted Medical Practitioners



This document can be made available in alternative formats on request for a person with a disability.

© Department of Health 2023

Copyright to this material is vested in the State of Western Australia unless otherwise indicated.

Apart from any fair dealing for the purposes of private study, research, criticism or review, as permitted under the provisions of the *Copyright Act 1968*, no part may be reproduced or re-used for any purposes whatsoever without written permission of the State of Western Australia.