

Infection Prevention and Control Practices Complaint
By
Community Health Nurses Initiatives Group (Registered Nurses Association of Ontario)

1. What (if any) are the gaps or inaccuracies in this protocol? Are there any missing elements? What (if any) areas do not align with accepted guidelines or evidence-based practices?

As members of a self-regulating profession, registered nurses fully support effective processes to ensure public safety and accountability. CHING urges that OPHS Standards and protocols utilize emerging evidence on systemic approaches to improving safety by addressing root causes of adverse events. Collaborative analysis of strategies to improve safety, including decreasing risk from infectious diseases, are facilitated by organizational cultures that move beyond the easy assignment of individual blame to address complex failures within the health system. While sending complaints to the regulatory body of a regulated profession may sometimes be warranted, a core concept in the literature is a movement away from defining the problem as "bad people" to a "system that needs to be made safer" (IOM 2000).

References:

Canadian Patient Safety Institute and Saskatchewan Health (2006). Canadian Root Cause Analysis Framework: A Tool for Identifying and Addressing the Root Causes of Critical Incidents. Ottawa: Author. Accessed April 24, 2008 from <http://www.patientsafetyinstitute.ca/professionals/overview.html>

Institute of Medicine (2000). To Err is Human: Building a Safer Health System. Washington: National Academies of Science. Accessed April 24, 2008 from <http://www.iom.edu/CMS/8089/5575.aspx>

Registered Nurses' Association of Ontario (2004). Position Statement on Patient Safety. Toronto: Author. Accessed April 24, 2008 from http://www.rnao.org/Page.asp?PageID=122&ContentID=1080&SiteNodeID=471&BL_ExpandID=

World Health Organization (2005). WHO Draft Guidelines for Adverse Event Reporting and Learning Systems: From Information to Action. Geneva: Author. Accessed April 24, 2008 from http://www.who.int/patientsafety/events/05/Reporting_Guidelines.pdf

2. What are the top three changes (i.e., with regards to content, structure, language and terminology) that are required for this protocol to be finalized? none

3. Any other comments

As an expert interest group of the Registered Nurses' Association of Ontario, the Community Health Nurses' Initiatives Group appreciates the opportunity to participate in

this consultation process. We believe that the proposed revisions to the draft Ontario Public Health Standards and protocols will increase clarity , consistency, and quality of public health services to better serve Ontarians.