

APPEL Policy on Implementation of the Relevant Provisions of the National Open Disclosure Framework			
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Author:	Katherine Morrow		
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Floor -1, Beaux Lane House,
Mercer Street Lower,
Dublin 2,
D02 DH60.

T: +353 1 402 5129
F: +353 1 402 2272
E: ops@appel.ie
W: www.appel.ie

I. Abbreviations and Definitions

APPEL	Affiliation for Pharmacy Practice Experiential Learning
HEI	Higher Education Institution
DNC	Director and National Co-Ordinator of APPEL
DoH	Department of Health
Experiential Learning Placement	The in-service practical training of students managed by APPEL
PE	Practice Educator
PSI	Pharmaceutical Society of Ireland
RCSI	Royal College of Surgeons in Ireland
SoP	School of Pharmacy
SsoP	Schools of Pharmacy
Statutory Placement	4 th & 5 th Year Experiential Learning Placements
TCD	Trinity College Dublin, The University of Dublin
Trainer	Umbrella term for Supervisor, Preceptor or Snr Preceptor
TE	Training Establishment
UCC	University College Cork, National University of Ireland, Cork

II. Background

APPEL is a consortium of the UCC School of Pharmacy, RCSI School of Pharmacy and Biomolecular Sciences and the TCD School of Pharmacy and Pharmaceutical Sciences and manages the experiential learning placements for the integrated pharmacy programmes of the three SsoP.

III. Scope

The National Open Disclosure Framework was introduced by the DoH in October 2023 and aims to promote a clear and consistent approach by health and social care providers, including pharmacists, to open communication with patients and any relevant support person following a patient safety incident or an adverse event.

Open disclosure is an open, consistent approach to communicating with patients and their relevant person(s) when things go wrong in healthcare. This includes expressing regret for what has happened, keeping the patient informed, providing feedback on investigations and the steps taken to try to prevent a recurrence of the adverse event.

This policy seeks to lay out how APPEL addresses its obligations in relation to the National Open Disclosure Framework, particularly in relation to the requirements laid out in Chapter 5, Section 5.4.

IV. Purpose

Chapter 5 of the National Open Disclosure Framework articulates the expectation of Education Bodies in relation to open disclosure. Section 5.4 specifically lays out requirement for clinical and practice placements as follows: –

‘all training sites involved in the delivery and supervision of student clinical and practice placements have a policy in relation to open disclosure in place, which aligns with the principles of the Framework. All academic and clinical staff responsible for the clinical and practice education of health and social care staff and students, both in the educational body and clinical training sites, must have undertaken formal training in relation to open disclosure and should ensure that all students on placement have an opportunity to learn more about open disclosure in practice. Additional support must be provided to any students and/or trainees involved in open disclosure and patient safety incidents and adverse events during placement or internship’

This policy outlines the procedures APPEL will follow in order to progress to meet these requirements.

V. Roles and Responsibilities

The DNC, with the support of the APPEL Operations Team and the Practice Educators, will aim to ensure that pharmacists who are accredited as Trainers to MPharm students for the statutory patient facing clinical experiential learning placements are aware of their obligations in relation to open disclosure.

VI. Procedures

It is acknowledged that implementation of the full provisions of the framework will be introduced on a phased basis, and that regulatory guidance from PSI and structured training programmes for pharmacists will continue to be developed. As part of the implementation phase, APPEL will communicate the obligations of trainers under Section 5.4 of the National Open Disclosure Framework as follows:

I. APPEL Trainer Training

All trainers of statutory placements must complete trainer training as part of their accreditation. The training will include specific and contemporaneous information relating to open disclosure obligations pertaining to trainers in patient facing clinical placements. This will include signposting to currently available training programmes.

II. Trainer Handbooks

The trainer handbooks will include specific content referencing open disclosure obligations of health service professionals. This will include signposting to currently available training programmes.

III. Trainer Accreditation

All trainers of statutory placements must hold valid trainer accreditation for each placement that they precept a student. Accreditation of trainers is achieved through satisfactory completion of a Trainer Agreement & Declaration. This Trainer Agreement & Declaration will include a self-declaration from pharmacists which confirms their awareness of their professional obligations as pharmacists and trainers under the National Open Disclosure Framework (as appropriate for the placement type).

VII. History and Revision

This policy will be reviewed every year or in response to relevant changes to legislation, regulatory guidance or procedures within a HEI (whichever is sooner).

VIII. References

- i. **National Open Disclosure Framework:** <https://www.gov.ie/en/publication/97de69-patient-safety-and-advocacy-policy>
- ii. **HSE Website:** <https://www2.healthservice.hse.ie/organisation/qps-incident-management/open-disclosure/>
- iii. **HSE Training & Webinars:** <https://www2.healthservice.hse.ie/organisation/qps-incident-management/open-disclosure/open-disclosure-training-mandatory/>
- iv. **PSI Website:** <https://www.psi.ie/information-and-resources/open-disclosure>
- v. **IOP Online Module – Open Disclosure:** <https://iop.ie/cbs/selector>
- vi. **IOP Webinar Open Disclosure – Policy, procedures and legislative requirements for pharmacists, March 2025** <https://iop.ie/content/open-disclosure-policy-procedures-and-legislative-requirements-pharmacists>