

Standard Operating Procedure (SOP)

Patient Safety Incident Response Framework (PSIRF) ICB sign off process

August 2025

The Patient Safety Incident Response Framework (PSIRF) was published in August 2022 and replace the Serious Incident (SI) Framework 2015, changing the way that patient safety incidents are responded to and investigated.

The Patient Safety Incident Response Framework requires providers to develop and submit a Patient Safety Incident Response Plan (PSIRP) and a policy to the ICB for agreement and sign off. A PSIRP is a requirement of each provider or group/network of providers delivering NHS-funded care via the NHS Standard Contract.

Within the PSIRP, each organisation must identify how it will respond proportionately to all incidents requiring investigation. This includes priority incidents for a full Patient Safety Incident Investigation (PSII) and also meeting the national requirements for investigation such as those within the Learning from Deaths Framework and Never Events.

Providers are advised to review the following types of data sources to profile these patient safety incident risks: patient safety incident reports; complaints; whistleblowing incidents; Serious Incidents; mortality reviews; case note reviews; staff survey results; claims; and risk assessments.

The PSIRP is essentially a strategic plan to address the findings of the above data review. It should also identify the appropriate resource to ensure the requirements within each PSIRP can be achieved.

The PSIRP should also identify the interventions (or alternative review techniques) available and planned for incidents that fall outside the patient safety incident investigation plan but require action or new insight, e.g.:

- incident timelines
- structured judgement review/case note review/clinical review
- after-action review
- audit (to measure/monitor compliance against policy/guidance/expectations)

It is important to note that patient safety investigations are conducted for systems learning and improvement rather than for individual patients, families or staff. However, for all patient safety investigations there should be appropriate engagement and involvement of patients and/ or families and carers in line with PSIRF principles.

Other investigation types are designed with differing remits to meet any other types of investigation related requirements e.g.

- HR investigations (for concerns about individual competency/ performance)
- legal investigations (for concerns surrounding liability, avoidability, etc).
- Coroner's investigations (to determine cause of death)
- Complaint investigations (for patient/ family concerns that fall outside the incident process)

Consequently, for assurance purposes, ICBs will need to ensure as part of the sign-off process that each provider can demonstrate that relevant safety incident related risks have been identified. Additionally, that there is a logical rationale for determining which incident types are prioritised for PSIRs and other alternative responses throughout the forthcoming year.

After sign off, an edited version of the PSIRP document and policy should be published on the provider organisation's website.

Hertfordshire and West Essex ICB propose the following process to achieve a robust sign off of the Provider PSIRPs and policies.

1. Each provider will work collaboratively with Hertfordshire and West Essex ICB during the PSIRF implementation process to ensure they are supported with their PSIRF implementation.
2. Early discussions will take place to identify any other ICBs working with the provider to support PSIRF implementation, and where relevant either a lead commissioner will be identified to work with the provider, or an approach will be agreed to support a consistent approach across ICBs.
3. During an initial meeting with the provider any support needs will be identified, it will be agreed whether the PSIRP is being developed at a local, regional or national level (depending on provider), and the provider will be asked to consider their internal governance process and training requirements to ensure appropriate alignment to the PSIRF standards.
4. During the development of the provider PSIRP, the provider will consider how the PSIRP will clearly describe all relevant types of incidents, broken down by specialty, service area or site, to support robust patient safety investigation and learning.
5. Where Herts and West Essex ICB is the lead commissioner, the draft provider PSIRP will be shared with the ICB for discussion and feedback. Where appropriate a meeting will be arranged to discuss required revisions to the draft document.
6. A decision will be made by Herts and West Essex ICB whether only minor revisions are required. Where this is the case, the PSIRP can progress the provider Board

for final approval. Where more significant changes are required the revised PSIRP should be shared with Herts and West Essex ICB for further review prior to submission to the provider Board for final approval.

7. Where multiple ICBs are involved in the approval process, the draft PSIRP should only be submitted to the provider Board for final approval after each ICB has agreed the draft PSIRP is proportionate and supports a robust level of safety investigation.
8. Once the draft PSIRP has been approved by the provider Board, this will be submitted for formal review and approval by Herts and West Essex ICB (and other ICBs where relevant). For all NHS Trusts within the ICS area, and the larger Independent Sector Providers, the PSIRP will be reviewed and approved via the ICB Patient Safety Specialist with the ICB patient safety team and ICB Quality Assurance and Improvement Team. For smaller Independent Sector Providers, the PSIRP will be reviewed and approved by the ICB Patient Safety Specialist (or Deputy) to support a proportionate approach.
9. Once the PSIRP is approved, an email from Herts and West Essex ICB Patient Safety Specialist to the provider confirming ICB approval.
10. The provider will share the final approved PSIRP with all relevant ICBs and publish a copy of the PSIRP on their public facing website.

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