

## Regulation 10: Roles and responsibilities of licensees

To ensure patient safety and welfare by putting in place governance frameworks staffed with the right people who have distinct roles

Personnel	Compared to PHMCA	Characteristics	Role	Responsibility
Licensee	No change	Licensee can be a corporation or an individual, e.g. the CEO.  Not required to have clinical expertise.	The licensee is <b>responsible and accountable for overall compliance</b> with HCSA.  Responsibility is <b>non-delegable</b> but KAHs, POs, CGOs assist the licensee to comply with HCSA requirements.	

- For smaller providers (e.g. solo-practitioner clinic), the same person can be the licensee, Principal Officer (PO) and Key Appointment Holder (KAH), as long as that person meets the requisite requirements of the various roles.

## Roles and responsibilities of Key Appointment Holders (KAHs)

Personnel	Compared to PHMCA	Characteristics	Role	Responsibility
<p><b>Key Appointment Holders</b></p>	<p>Not defined under the Private Hospitals and Medical Clinics Act (PHMCA).</p> <p><u>Formalisation of the roles of KAHs that already exist today</u> (e.g. sole proprietor, partners, board of directors).</p>	<p>KAHs are the <b>governing body</b> and generally the controlling mind and will of the licensee.</p> <p><b>At least 1 KAH is required to have clinical expertise* unless this can be fulfilled by the PO (or if a CGO is appointed).</b></p> <p>Has the authority to <u>provide high-level management and clinical direction</u> but more limited direct influence over day-to-day operations on the ground as compared to the PO or CGO.</p> <p>*Only applicable for underlying licence, as the clinical requirement for special licensable services is fulfilled by CGO</p>	<p>To ensure the organisation is financially sustainable, and that organisational processes are robust and comply with all laws and regulations.</p> <p>Duties stipulated under the Code of Practice.</p>	<p>Responsible for the <b>strategic leadership and general management oversight</b> of the licensable service.</p>

# Enhanced governance

## Regulation 14: Roles and responsibilities of Principal Officer (PO)

Personnel	Compared to PHMCA	Characteristics	Role	Responsibility
<b>Principal Officer</b>	<p>Similar to the role of the manager under the PHMCA, except with no clinical expertise requirement<sup>#</sup>, so as to allow businesses greater flexibility in appointing the PO</p> <p><b><u># In effect, this clinical expertise requirement can be met either by the PO or the KAH under HCSA</u></b></p>	<p>Required to have organisational authority.</p> <p>Generic role with no specific qualifications or requirements.</p> <p>PO has <u>direct management authority over the day-to-day operations</u> of the licensed service, e.g. the clinic manager.</p>	<p><b>Oversees day-to-day management</b> of the licensee and ensures operational compliance with HCSA.</p> <p>Duties set out in the General Regulations.</p>	<p>To ensure <b>operational compliance</b> with HCSA and that services are provided in a manner that ensures patients' safety, welfare and continuity of care.</p> <p><b>Oversees the <u>implementation of policies and SOPs</u></b>, and reviews and manages any clinical or enterprise risk, to ensure that the healthcare service complies with HCSA.</p>

## Regulation 15: Roles and responsibilities of Clinical Governance Officer (CGO)

Personnel	Compared to PHMCA	Characteristics	Role	Responsibility
<b>Clinical Governance Officer</b>	<p>New role, only required for certain prescribed services which require specialised technical expertise</p> <p>Formalisation of previous technical roles for certain services</p>	<p>The CGO is the <u>technical expert</u>, e.g. Clinical Laboratory Director, Director of AR Services.</p> <p>Will be required to possess specific qualifications.</p>	<p><b>Oversees the day-to-day technical aspects</b> of the licensable service.</p> <p>Duties and qualifications will be set out in relevant service regulations.</p>	<p><b>Responsible for <u>technical oversight and implementation</u></b> of complex services that require specialised expertise.</p>

- While it is up to licensee to decide whether to appoint one or more CGO, multiple CGOs should be appointed if a single CGO is not sufficient to fulfil the duties and responsibilities of CGO stipulated in the General Regulations and individual service regulations for the entire scope of services provided by the licensee.
- When multiple CGOs are appointed, licensee must make clear the delineation of responsibilities amongst the CGOs.