

Entry Permit Holder Report

SafeWork SA

Application ID 22174170

Entry Permit Holder	
Full Name:	Bernadette Mulholland
Permit Number:	ET-25-03411
Union Represented:	South Australian Salaried Medical Officers Association
Worksite Entered	
Business Name:	Flinders Medical Centre Emergency Department
Industry:	Other Health
Address:	Flinders Drive Bedford Park SA 5042
Date workplace entered:	09/09/2025

I Bernadette Mulholland am of the opinion that the PCBU has contravened the WHS legislation relating to:

	Suspected Contravention	More information	Was the contravention rectified?
PCBU Alleged Contravention 1	Inadequate facilities or access to facilities	The previous night the EPH was contacted and advised that there was significant access block and overcrowding in the FMC ED. In particular there had been one hundred patients in the Department and seven mental health patients waiting for a bed a number with ITOs. The lack of facilities and beds and staff culminated in queuing of ambulances up the ramp to get onto the ramp and bed block in the ED raising the risks for both patients and clinicians above	No

		<p>acceptable parameters. See attached photo.</p> <p>Need to increase bed base and a second ambulance park near the ED. Previously used top floor of car park.</p>	
PCBU Alleged Contravention 2	Not maintaining safe systems of work	<p>Given the demand there were insufficient Senior Registrars on that night for the patient demand.</p> <p>Need to ensure more Senior Registrars are on the roster. If there are insufficient Senior Registrars or medical decision makers employed by SALHN, the PCBU needs to ensure ready access to locum doctors to ensure safe senior medical staffing to meet demand. The PCBU had agreed to do this but there has been no evidence to demonstrate easy access to senior medical decision makers.</p>	No
PCBU Alleged Contravention 3	Not maintaining a safe work environment	<p>The insufficiency of senior registrars makes the FMC ED when demand regularly outstrips clinicians and beds in the ED unsafe for both the senior registrar and the patients.</p> <p>See above need to recruit sufficiency of senior trainees to ensure the safety of the service and clinicians.</p>	No
PCBU Alleged Contravention 4	Not maintaining a safe work environment	<p>There were 100 patients in the ED of these patients 35 patients were waiting for a bed 15 of the patients there were 5 mental health patients waiting for a bed over 24 hours. A number of the mental health patients were on ITOs . See Involuntary Treatment Orders. Staying in the ED was exacerbating mental health patients condition. Any bed for mental health patients seems to be the non-clinical view of the PCBU. Mental health patients like any other patient must be placed in the right mental health bed. Long term mental health patients are being placed in the mental health short stay unit which is knowingly unsafe.</p> <p>The PCBU agreed to support model of care submitted by the psychiatrists in SSU but has not progressed, this is</p>	No

		creating substandard clinical care for patients and distress for staff.	
PCBU Alleged Contravention 5	Not maintaining a safe work environment	<p>The PCBU agreed to improve the mental health staffing in the ED ensuring more senior mental health nurses on 24x7 in the FMC ED and psychiatry registrars are allocated to the FMC ED. The PCBU has not progressed the business case for some months and mental health patients continue to be treated in the FMC ED without specialist care or access to the right mental health beds. There were 8 mental health patients at time of inspection on ITOs. The longest waiting MH patients waiting for a bed Pt 1 - 72 hours, Pt 2- 70 hours, Pt 3 - 67 hours. Pt 4 - 50 hours and Pt 5 - 41 hours.</p> <p>The PCBU need to approve the business case for the extra mental health staff needed to provide safe care in the FMC ED for mental health patients and staff..</p>	No
PCBU Alleged Contravention 6	Inadequate facilities or access to facilities	<p>The mental health Short Stay Unit which pulls appropriate patients from the FMC ED is not a facility for the care of long term mental health patients and there are significant safety risks to both staff and patients when long term mental health patients are placed in the short stay facility. The short stay unit does not have actual rooms and is specifically set up like an ED facility - cubicle spaces and not rooms - to ensure appropriate care of these mental health patients. This also leads to moral injury for the medical officers in the Short Stay Unit and FMC ED and is a a psychosocial hazards.</p> <p>The PCBU needs to engage and endorse the model of care submitted by these doctors to support the staff and patients in the Short Stay Unit and minimize harm to staff and patients in this service.</p>	No
PCBU Alleged Contravention 7	Not maintaining a safe work environment	The PCBU needs to work with the doctors in the Short Stay Unit and the FMC ED to maintain care for mental health patients in the ED and who	No

		<p>transfer to the Short Stay Unit. New beds will not be available for mental health patients in the acute mental health service and these patients cannot languish in the ED and the Short Stay Unit as it is unsafe and creates access block. In particular mental health patients who become agitated have not the appropriate setting to deescalate their agitation or receive the appropriate care.</p> <p>The PCBU needs a short term plan for long term acutely unwell patients. The FMC ED and Short Stay Unit cubicle spaces are not appropriate and may need to aggression and hostility of the patients towards clinicians in these areas.</p>	
PCBU Alleged Contravention 8	Inadequate facilities or access to facilities	<p>With the amount of demand of highly acute patients it is incumbent on the administration to ensure appropriate facilities and beds so access block and the risk to the FMC ED for staff and patients is reduced.</p> <p>The hospital administration advised that there are insufficient beds and difficult to get beds in the private sector. The lack of beds creates known safety risks for staff in the FMC ED and the Short Stay Unit. The PCBU must find additional beds and facilities to meet the patient demand. The Coroner in a recent report advised that the FMC ED is too small giving risk to risks for patients and staff including those on the ramp. The PCBU needs to advise immediately the plan for improved ED facilities at FMC.</p>	No