

Primary care services delivered online: Board update

1. Summary

CQC have carried out initial inspections of 15 providers of primary care services delivered online. We have significant concerns regarding the quality of care delivered by some providers. In light of this experience, we have been refining our registration approach, inspection methodology, guidance to providers and inspectors, and working in partnership with other regulators to address this risk. CQC supports and encourages innovation which improves the quality and accessibility of health and care services, but will take action where safety is compromised.

This paper provides an update on these next steps for CQC in assuring the quality and safety of care for people in England. We will use our experience in the primary care sector and from horizon-scanning to continue to refine our approach to health and care regulation.

2. Discussion

2.1 Progress on Primary medical services digital programme

CQC now have 46 (as of 20 April 2017) registered providers of primary care services online. We have continued our risk-stratified inspection programme, and have completed 15 inspections. We aim to complete inspections of all providers by Autumn 2017.

We have published six reports to date and have highlighted our concerns in a [shared statement](#) with partner regulatory agencies (General Medical Council (GMC), General Pharmaceutical Council (GPhC) and Medicines and Healthcare products Regulatory Agency (MHRA)). We have taken a range of enforcement action in respect of these first six providers: 1 cancellation, 2 suspensions, 1 urgent condition, 1 warning notice, 1 requirement notice. This work has received significant media attention and has led to a number of members of the public and healthcare professionals contacting us about their own experiences. This intelligence is being used to inform our inspection programme.

We have expanded our pool of inspectors and clinical SpAs. We have also recruited and are training digital specialist advisors to provide specialist input on digital systems and information security in support of the inspection teams.

Every new application for registration is assessed against our updated assessment framework, and is subject to a formal management process with specialist clinical and digital advice. We will carry out inspections of newly registered providers within 3 months of registration.

As of 6 Apr 2017, there were 13 providers with ongoing unregistered provider queries, 5 providers confirmed out of scope of regulation where action has been closed, and 5 registration applications in progress.

Over the next four months we will:

- Complete first round inspections of all registered providers of primary care online
- Publish final guidance to the sector, following review of feedback from providers and stakeholders on draft guidance
- Write a letter to all registered providers highlighting the cross-cutting themes identified on inspection with a copy of the final guidance
- Publish an end of programme report, highlighting key findings and a description of what good looks like

2.2 System-wide collaboration

We are working closely with partner agencies where providers cross between our areas of regulatory oversight. We are highlighting CQC's scope of regulation in the context of online services with the Department of Health.

We have established a cross-regulatory working group to share intelligence and further refinements to methodology. This group includes: the General Medical Council (GMC), Nursing and Midwifery Council (NMC), General Pharmaceutical Council (GPhC), Medicines and Healthcare Products Regulatory Agency (MHRA), and the Department of Health (DH).

We have continued the work of our External Advisory Group providing input to the online primary medical service inspection methodology.

We have presented our early findings from PMS inspections at the National Quality Board (NQB). The NQB were keen to have oversight of the work various partners need to undertake to address the issues, and whilst supporting innovation, a robust approach to patient safety should be taken.

Finally, we have arranged an executive round table for the four nation quality regulators and the national professional regulators. We will highlight the risks we have identified, discuss cross-border coordination and establish close working relationships between the organisations.

2.3 Next steps for CQC

We will take forward a programme of work which uses our experience to date of regulating digital primary care to inform CQC's future approach to the use of technology in health and social care more generally. This work will be overseen by a cross-directorate steering group and sponsored by Malte Gerhold (as Executive Sponsor), and Ruth Rankine (as Deputy Chief Inspector Sponsor).

This programme will complete a horizon scanning update, develop a standardised approach to new innovations in the health and care sector, and develop a common approach to the inspection of aspects of health or care delivered through digital means across CQC's operating model, from registration, through monitoring to inspection. This programme will aim to ensure a consistent approach across the sectors we regulate, and between inspections of NHS and independent sector providers.

As part of this work, we are reviewing our engagement groups and will establish a co-production group, drawing on expertise from industry bodies and providers to allow us to stay in step with the pace of development in the digital healthcare sector.