



To: National Quality Board

For meeting on: 07 June 2017

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Paper for:

Decision	Discussion	Information
	X	X

Title: NQB Workshop on Online Providers of Primary Care Services: Next Steps

Summary:

This paper provides feedback from the NQB Workshop on Online Providers of Primary Care Services held on 11 April 2017, and sets out proposed next steps for the NQB on digital healthcare in general.

Purpose:

The NQB is asked to:

- 1) **Note** the feedback from the workshop;
- 2) **Advise** on the proposed next steps to establish a cross-system working group and to give further consideration at a future meeting to the relationship between the NQB and NIB.

ALB Involvement in development and sign-off of paper:

X	X		

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## Feedback from the Workshop

CQC presented early findings from the risk-stratified inspection programme of online providers of primary care services. It was recognised that whilst online provision of healthcare can deliver improved quality and accessibility of services to patients, patient safety must be a core concern of innovative services.

CQC highlighted some of the challenges in regulating the quality of healthcare delivered to patients in this sector, and some cross-cutting areas of risk. Effective collaboration between partner regulators, including the General Medical Council (GMC), General Pharmaceutical Council (GPhC), and Medicines and Healthcare products Regulatory Agency (MHRA) has been essential to delivery of this inspection programme.

Four main areas were highlighted which could frame action from the NQB:

### 1. Regulatory Oversight

The workshop recognised that close partnership working between the national professional, medicines and quality regulators is essential to effective regulation of innovative healthcare services. Due to changes in the nature of care delivery, there are now regulatory challenges under the current legislative framework which will require input from the Department of Health to deliver.

Attendees highlighted that a set of proposals for how regulatory legislation might change could be developed under the auspices of the NQB.

### 2. Standard Setting

Attendees noted that this is an area where evidence is still in development, and standards are not always in existence. Current work by NHS Digital and NICE on App accreditation and an assessment framework for machine learning algorithms were highlighted.

Identity checks for online healthcare delivery were discussed, as this needs system-wide consistency. Work is being undertaken by NHS Digital in collaboration with the Cabinet Office and other stakeholders on this area and CQC are feeding into this process.

CQC will be publishing a report, highlighting areas of good practice and where improvement is necessary in these providers following the completion of the first round inspections in autumn 2017.

System collaboration is vital for consistency and relevance of new standards in development for innovative services.



### **3. System Collaboration**

As providers cross geographic borders, national collaboration is also vital. CQC is hosting a roundtable in May 2017 for the four nation quality, medicines and professional regulators to consider these issues, which could feed into proposals for legislative change.

Education and awareness of guidance and standards for health and care providers and professionals is another important strand of this work. Information for people who use services and their families is also key.

Finally, innovation is moving apace, and engagement with the online provider sector and pharmaceutical industry will play an important role.

### **4. International Considerations**

It was recognised that there are additional considerations which fall outside the remit of the NQB.

The geographic challenges of online care delivery expand beyond England, covering the borders between the four UK nations, and also external to the UK as a whole. The CQC roundtable with the four nation quality regulators will establish groundwork for a UK wide approach to regulation of these providers.

However, there will remain non UK based providers delivering care to patients within the UK, and UK based providers delivering care to patients in other countries. At the NQB seminar, the ability of UK-based regulators to have effective oversight of such providers was highlighted, and potential avenues for enforcement were mentioned including payment processing.

These international considerations, especially concerning healthcare delivery to European patients, where legal frameworks for online sale of medicines and non-face-to-face consultation differs between member states are key areas for the Department of Health to consider. The inevitable changes accompanying Brexit will also need consideration.

There was consensus in the meeting that this is an area of healthcare delivery which has been foreseen for some time. It was felt that online prescribing services offered a starting point for the NQB to oversee work in this area.

There was also strong support for a system wide approach to standards and regulation to get the best outcomes for patients. All the organisations present at the meeting have differing areas of oversight or responsibility, and roles to play in the delivery of safe innovative services for patients.



## Proposed Next Steps for the NQB

The workshop identified number of challenges for the system. These included:

- A lack of clarity of what high quality care looks like for innovative services provided through digital channels
- Gaps in the current regulatory framework which mean regulators do not have sufficient oversight to protect patients from harmful practice
- The need to work across multiple organisations, regulatory frameworks and nations

The challenges were therefore wide ranging and reach further than the examples of online prescribing highlighted in the workshop. The general consensus was that it would be helpful for NQB to provide cross-system leadership in order to bring the system together to tackle these challenges.

We suggest the establishment of a cross-system working group to focus on:

1. Using the NQB's Shared Commitment to define high quality care in digital provision, such as online prescribing. This would inform system-wide collaboration on standards and expectations for innovative healthcare delivery in the NHS and independent sector – for example, on Identity Checks. This work would be led by NHS England but informed by others members of the working group
2. The quality and regulatory framework that would need to be in place to ensure the definition of high quality care could be supported and standards met. Once the gaps are identified a proposal for regulatory changes would be put forward. This work would be led by CQC, building on the work they have already done with regulators
3. Collaborating with the Department of Health to consider the international components of this work

***Is the NQB content for the NQB Secretariat to put a working group in place to begin scoping the work above?***

## Relationship between the NQB and the National Information Board (NIB)

The workshop raised the question of interplay between the NQB and the NIB. The role of the NIB is to put data and technology safely to work for patients, service users, citizens and the professionals who serve them. The NQB could take the formal role of describing how high quality care can be enabled by technology and inform the work of the NIB to put this technology to work for patients. This would cover the example in the workshop but also ensure a broader understanding of how technology and the opportunities it brings can enable high quality care.

***Is the NQB content to give this further consideration as an agenda item at a future meeting?***