

# High level principles for good practice in remote consultations and prescribing

This information is for all healthcare professionals with prescribing responsibilities. It sets out the shared high level principles of good practice expected of everyone when consulting and or prescribing remotely from the patient.

The principles are underpinned by existing standards and guidance from professional and system regulators. Healthcare professionals should continue to follow guidance from regulatory bodies and take clinical guidance into account in their decision making.

This information is not clinical guidance or new guidance from regulatory bodies.

These principles have been co-authored and agreed by a range of healthcare regulators and organisations (see Annex A)

## Safeguards for patients accessing healthcare remotely

Remote consultations and prescribing provided online, over video-link or by phone can benefit patients<sup>1</sup>, save resources and help meet public demand for more convenient access to healthcare.

However, there are potential patient safety risks, particularly where services aren't linked to a patient's NHS GP or regular healthcare provider, and where there may be limited access to a patient's medical records. Issues include increased attempts to gain access to medicines which can cause serious harm and the need to ensure safe ongoing monitoring of those with long term conditions. Providers of remote services and the healthcare professionals they work with must be aware of these risks and be clear about their responsibilities for protecting patients.

Patients can expect to have effective safeguards in place to protect them when they receive advice and treatment remotely. Safeguards are necessary whether the consultation happens in the context of a continuing treating relationship or is a one-off interaction between a patient and a healthcare professional.

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<sup>1</sup> In this context the term 'patient' refers to all people using health and care services including pregnant women, service users and clients receiving non-surgical/clinical treatments.

## Key principles

We expect UK registered healthcare professionals to follow ten high level key principles when providing remote consultations and prescribing remotely to patients based in the UK or overseas.

1. Make patient safety the first priority and raise concerns if the service or system they are working in does not have adequate patient safeguards including appropriate identity and verification checks.<sup>2</sup>
2. Understand how to identify vulnerable patients and take appropriate steps to protect them.
3. Tell patients their name, role and (if online) professional registration details, establish a dialogue and make sure the patient understands how the remote consultation is going to work.
4. Explain that:
  - a. They can only prescribe if it is safe to do so.
  - b. It's not safe if they don't have sufficient information about the patient's health or if remote care is unsuitable to meet their needs.
  - c. It may be unsafe if relevant information is not shared with other healthcare providers involved in their care.
  - d. If they can't prescribe because it's unsafe they will signpost to other appropriate services.
5. Obtain informed consent and follow relevant mental capacity law and codes of practice.
6. Undertake an adequate clinical assessment and access medical records or verify important information by examination or testing where necessary.
7. Give patients information about all the options available to them, including declining treatment, in a way they can understand.

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<sup>2</sup> NHS Digital has published [The Identity and Verification standard for Digital Health and Care Services \(2018\)](#). For guidance on safe and appropriate online and remote provision of sexual health services please refer to Faculty of Reproductive Sexual Health (FRSH) and British Association for Sexual Health and HIV (BASHH) [Standards for Online and Remote Providers of Sexual and Reproductive Health Services](#).

8. Make appropriate arrangements for after care and, unless the patient objects, share all relevant information with colleagues and other health and social care providers involved in their care to support ongoing monitoring and treatment.
9. Keep notes that fully explain and justify the decisions they make.
10. Stay up to date with relevant training, support and guidance for providing healthcare in a remote context.

## **Working in safe systems**

Responsible employers and providers of remote services will have systems in place to check patients' identity and identify patterns of behaviour which may indicate serious concerns so that appropriate steps can be taken to protect patients.

Particularly vulnerable patients may include those at risk of self-harm, substance or drug use disorders, those with long term conditions, and children attempting to access services intended for adults.

Healthcare professionals who are responsible for leading a team or service offering remote care are expected to make sure that staff are clear about their roles, their personal and collective responsibilities for individual patients, and the quality and safety of care provided by the team or service. They have a responsibility to contribute to setting up and maintaining effective systems to identify and manage risks, and to act quickly where patients may be at risk of harm.

## **Recognising the limitations of remote prescribing**

It is important for healthcare professionals and employers to consider the limitations of remote services when deciding the scope of practice and range of medicines prescribed. Some categories of medicines are not suitable to be prescribed remotely unless certain safeguards are in place. The General Pharmaceutical Council has produced guidance which explains that pharmacies based in England, Scotland and Wales may not supply these categories of medicine without having an assurance that these safeguards are in place. The Pharmaceutical Society of Northern Ireland provides standards and guidance on internet pharmacy services for pharmacies based in Northern Ireland.

## **Offering remote services to patients overseas**

If UK based healthcare professionals are considering working for service providers based in other countries, it's important to be aware that there may not be established local mechanisms to provide effective systems regulation and this may impact on patient safety. Before providing remote services to patients overseas the healthcare professional should check if they are required to register with regulatory

bodies in the country where they are based, and where the patient is based and where any medicines they prescribe are to be dispensed. They also need to check they have an arrangement in place to provide indemnity or insurance to cover their practice in all relevant countries.

When prescribing to a patient overseas, UK based healthcare professionals are expected to consider how they or local healthcare professionals will monitor the patient's condition. The healthcare professional needs to take account of any legal restrictions on prescribing or the supply of particular medicines, and any differences in a product's licensing or accepted clinical use in the destination country. They should follow UK and overseas legal requirements and relevant guidance on import and export for safe delivery, including from the Medicines and Healthcare products Regulatory Agency.

## Further information and guidance

Links to relevant information and guidance published by professional and system regulators, royal colleges and faculties, professional bodies and other stakeholders are provided below.

### Professional regulators

The following organisations regulate healthcare professionals in the UK.

#### General Dental Council

- [\*Standards for the dental team \(2013\)\*](#)

#### General Medical Council

- [\*Good medical practice \(2013\)\*](#)
- [\*Good practice in prescribing and managing medicines and devices \(2013\)\*](#)
- [\*Ethical hub resource on remote consultations\*](#)
- [\*Ethical hub resource on adult safeguarding  
Protecting children and young people; the responsibilities of all doctors  
\(2018\)\*](#)

#### General Optical Council

- [\*Standards of practice for optometrists and dispensing opticians \(2016\)\*](#)
- [\*Standards for Optical Businesses \(from 1 October 2019\)\*](#)

#### General Pharmaceutical Council

- [\*Guidance for registered pharmacies issuing prescriptions at a distance  
including on the internet \(2019\)\*](#)
- [\*Standards for pharmacy professionals \(2017\)\*](#)

#### The Health and Care Professions Council

- [\*Meeting our Standards\*](#)
- [\*Standards for Prescribing \(2019\)\*](#)

## Nursing and Midwifery Council

- [Professional code](#)
- [Standards for prescribers](#)
- [FAQ on remote prescribing: what do I need to consider as a nurse, midwife or nursing associate when medicines are prescribed remotely?](#)

## Pharmaceutical Society of Northern Ireland

- [Standards and guidance for pharmacists prescribing \(2013\)](#)
- [Standards and guidance on internet pharmacy services \(2013\)](#) (this document is currently under review)

## System regulators

The following organisations regulate services in the UK including online.

- England - [Care Quality Commission](#)
- Wales - [Healthcare Inspectorate Wales](#)
- Scotland - [Healthcare Improvement Scotland](#)
- Northern Ireland - [Regulation and Quality Improvement Authority](#)

## Other regulators

[The Medicines and Healthcare products Regulatory Agency](#) is the regulator for medicines, medical devices and blood components for transfusion in the UK.

## Royal Colleges and Faculties

- The Academy of Medical Royal Colleges - [www.aomrc.org.uk](http://www.aomrc.org.uk)
- Faculty of Pain Medicine
  - [Opioids Aware: A resource for patients and healthcare professionals to support prescribing of opioid medicines for pain](#) co-published with Public Health (England)

- Faculty of Sexual and Reproductive healthcare
  - [\*Standards for Online and Remote Providers of Sexual and Reproductive Health Services \(2019\)\*](#) co-published by the Faculty of Sexual and Reproductive healthcare and the British Association of Sexual Health and HIV
- Royal College of General Practitioners
  - [\*Online consultations in general practice: the questions to ask \(2018\)\*](#)
- Royal Pharmaceutical Society
  - [\*Online pharmacy services policy \(2019\)\*](#)
  - [\*Competency framework for all prescribers\*](#)
  - [\*Protecting vulnerable adults\*](#)
  - [\*Protecting children and young people\*](#)

## **Other organisations**

British Medical Association

- [\*Choosing an online consultation system \(2018\)\*](#)

Information Commissioner's Office

- [\*Rights related to automated decision making including information profiling\*](#)

National Cyber Security Centre

- [\*Guidance on secure voice technology\*](#)

NHS Digital

- [\*Clinical Risk Management: its Application in the Deployment and Use of Health IT Systems \(2018\)\*](#)
- [\*The Identity and Verification standard for Digital Health and Care Services \(2018\)\*](#)

NHS England

- [\*Using online consultations in primary care implementation toolkit \(2019\)\*](#)

### **Further information on mental capacity**

- [\*Mental capacity act \(England and Wales\) 2005 code of practice\*](#)
- [\*Adults with incapacity act \(Scotland\) 2000\*](#)
- [\*Mental capacity act \(Northern Ireland\) \(2016\)\*](#) (yet to be enacted)  
Common law currently applies in Northern Ireland.

### **Further information on safeguarding**

England

- NHS England safeguarding steering group [resources](#)

Wales

- [\*Safeguarding: Guidance for organisations\*](#) published by Welsh Government

Scotland

- [\*Child protection guidance for Health Professionals \(Scotland\) \(2013\)\*](#)  
published by the Scottish Government
- [National Guidance for Child Protection in Scotland](#) (2014)
- [\*Code of Practice on Adult Support and Protection\*](#)

Northern Ireland

- [\*Adult safeguarding – prevention and protection in partnership \(2015\)\*](#) co-published by the Department of Health, Social Services and Public Safety and Department of Justice Northern Ireland.

### **Annex A**

The principles have been co-authored and agreed by:

Academy of Medical Royal Colleges, Care Quality Commission, Faculty of Pain Medicine, General Dental Council, General Medical Council, General Optical Council, General Pharmaceutical Council, Healthcare Improvement Scotland, Healthcare Inspectorate Wales, Nursing and Midwifery Council, Pharmaceutical Society of Northern Ireland, Royal Pharmaceutical Society, Regulation and Quality Improvement Authority.