Covid-19 Recovery Guidance

IT in Covid-19 Recovery - Management and Guidance for Remote Working

Many clinics have adopted some form of virtual consultation or triage during the immediate response phase to COVID-19. Sustaining this change into the later recovery stages may be something clinicians and practices wish to consider in the interests of:

- Reducing the number of practice visits
- Reducing the risk (perceived and real) to staff and patients
- Observing social distancing rules
- Allowing team members to work from home
- Reducing the load on clinical space to allow appropriate cross-infection control measures.

1. Governance and Data Use

There are significant risks to patient data when working with third party software providers and when remote working. Steps should be taken to ensure compliance with the Data Protection Act (2018) and within the GDPR (2018) regulations.

Specific steps and considerations might include:

- Consultation with the Data Protection Officer

- Ensuring provider complies with GDPR regulations (some platforms are not UK based)

- A Data Processing Agreement and Data Protection Impact Assessment is in place if required with third parties

- What security steps are in place within the software platform (eg: two step verification)

- Where is the data stored and if/how it is encrypted?

- How is the data used within the virtual consultation platform?

- What form of data usage have patients consented to prior to COVID-19 and is a supplementary Data Privacy Note required?

- Integrity and security of any network (such as wi-fi or VPN if working remotely)

- Are individuals using their own devices and is a 'Bring your own computer' policy required?

- If staff are working from home is there a need for a 'working from home policy'
- How are the details relating to any virtual appointment going to be added to the contemporaneous patient record?

The over-arching principle is to consider what type of information you are sharing and with whom. And as much as possible limit the use and sharing of personal/confidential patient information.

> *"We will need to work in different ways from usual and the focus should be **what** information you share and **who** you share it with, rather than **how** you share it. (This advice is endorsed by the Information Commissioner's Office, the National Data Guardian and NHS Digital.)*

<u>Mobile messaging</u>
It is absolutely fine to use mobile messaging to communicate with colleagues and patients/service users as needed. It is also fine to use commercial, off-the-shelf applications such as WhatsApp and Telegram where there is no practical alternative and the benefits outweigh the risk.

<u>Videoconferencing</u>
We encourage the use of videoconferencing to carry out consultations with patients and service users. This could help to reduce the spread of Covid-19. It is fine to use video conferencing tools such as Skype, WhatsApp, Facetime as well as commercial products designed specifically for this purpose.

<u>Consent</u>
The consent of the patient or service user is implied by them accepting the invite and entering the consultation. But you should safeguard personal/confidential patient information in the same way you would with any other consultation.

Reviewing the latest advice from the indemnity organisations is also strongly advised when considering remote working and virtual consultations.

2. **Virtual Consultation**

Before starting to use a virtual consultation platform it is recommended that time is taken to carefully document a virtual appointment pathway. Steps to cover might include:

Getting started
- Identification of potential virtual appointment types
- Selection of virtual consultation platform
- Due diligence and compliance
- Identification of workforce required for implanting / delivering virtual appointments
- Integration with existing practice management software/systems

Making, confirming and managing appointments
- Mode and timing of communication (Link to BOS templates are included at the end)
- Consent requirements for virtual consultation

   Prior to appointment
   - Online booking options
   - Is there a requirement for patients to take and upload photographs?
   - Any other instructions are there for patients

   During appointment
   - Use of a virtual waiting room
   - Fail to attend protocol – immediate follow up
   - What are the clinical objectives (and limitations) for the virtual appointment?

   Following the appointment
   - Process for booking next appointment
   - Contingency for patients requiring a subsequent face-to-face appointment

- Updating other systems (eg patient record, BSA/Compass)

Resources

BOS advice for secure transfer of patient photos
https://www.bos.org.uk/News-and-Events/COVID19-BOS-Advice/Orthodontic-Provider-Advice/GDPR-for-the-secure-transfer-of-patient-images

BOS guidance on how to take videos for a virtual consultation
https://www.bos.org.uk/COVID19-BOS-Advice/Patients-Advice/How-to-take-photos-videos-for-your-Orthodontist

BOS patient letter templates
https://www.bos.org.uk/Portals/0/Public/docs/Advice%20Sheets/COVID19%20FACTSHEETS/Email%20template%20and%20setting%20up.pdf

NHS guidance
https://www.nhsx.nhs.uk/key-information-and-tools/information-governance-guidance