

Nationwide Pharmacies Ltd

Inspection report

Unit 1
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Website: www.nationwidepharmacies.co.uk

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This report describes our judgement of the quality of care at this service. It is based on a combination of what we found when we inspected, information from our ongoing monitoring of data about services and information given to us from the provider, patients, the public and other organisations.

Ratings

Overall rating for this location

Good



Are services safe?

Good



Overall summary

We carried out an announced focused inspection at Nationwide Pharmacies Ltd, an online GP consultation and prescribing provider located in Buckinghamshire on 25 October 2019.

At our previous inspection in April 2019, the service was rated good overall, however we identified concerns relating to the provision of safe services. We therefore rated the safe key question as Requires Improvement and we issued a requirement notice in relation to the safety systems to manage medicines and verify patient identity. Specifically:

- The provider prescribed medicines to treat asthma and Class 4 and 5 controlled opiate medicines such as codeine and dihydrocodeine. The records we reviewed did not detail a rationale for prescribing these medicines without consent to contact and share information with the patients GP.
- Patient identity checks were not fully effective in particular for patients being prescribed medicines liable to abuse, overuse or misuse or medicines that require ongoing monitoring or management.

The April 2019 inspection was part of the digital and online providers inspection programme to check whether the provider was meeting the legal requirements and regulations associated with the Health and Social Care Act 2008. The inspection reports for the previous inspections can be found by selecting the 'all services' link for Nationwide Pharmacies Ltd on our website at www.cqc.org.uk

At this inspection, on 25 October 2019, we found the service had addressed the issues identified at the last inspection. This led to the service being rated as Good for the provision of safe services whilst the overall rating of Good remains.

At this inspection we found:

- Nationwide Pharmacies Ltd had made significant improvements to address the concerns identified at the April 2019 inspection. We saw the provider had effectively assessed, monitored and improved the safety of the services provided. These improvements were managed via a series of action plans and resulted in a change to the operating model.
- We saw the provider had revised and strengthened the processes and supporting systems when the GP prescribed medicines for the care, treatment and management of asthma and a range of medicines for pain relief which included opiates.
- The prescribing process now included compulsory access to the patients Summary Care Record and contact with the patient's GP prior to a prescription being issued.
- Following the April 2019 inspection, we saw the provider had added an additional verification check when completing patient identity checks. On registering with the Nationwide Pharmacies Ltd, and at each consultation patient identity was verified. These existing checks now included an additional safety check for patients who were prescribed medicines liable to abuse, overuse or misuse or medicines that require ongoing monitoring. These patients were now required to provide photo identity such as driving licence or passport.

Dr Rosie Benneyworth BM BS BMedSci MRCGP

Chief Inspector of Primary Medical Services and Integrated Care

Our inspection team

Our inspection was led by a Care Quality Commission (CQC) lead inspector.

Background to Nationwide Pharmacies Ltd

Nationwide Pharmacies Ltd is based in High Wycombe in Buckinghamshire. Nationwide Pharmacies Ltd set up an online provider in October 2012 and the service includes consultation with a GP. We did not inspect the provider's affiliated pharmacy, which is not within the remit of registration with Care Quality Commission (CQC). We inspected the online provider which is also known as Nationwide Pharmacies Ltd at the following address:

- Unit 1, Riverside Business Centre, Victoria Street, High Wycombe, HP11 2LT.

The provider employs staff who work on site including a superintendent pharmacist, pharmacy and administrative staff. The GP worked remotely from the provider. At the time of the inspection, the provider had approximately 57,000 patients registered, in the last two years, approximately 17,000 new patients had registered with the provider, however not all of them had been prescribed medicines.

The provider can be accessed through their website:

- www.nationwidepharmacies.co.uk

Where patients can complete an online questionnaire to be reviewed by a GP which may result in a prescription being provided. The provider is available for patients in the UK. Patients can access the provider by telephone from 9am to 5.45pm, Monday to Friday. This is not an emergency service. Subscribers to the provider pay for their medicines when making their on-line application.

Once approved by the GP, medicines are supplied and dispatched directly to the patient by the affiliated pharmacy.

Nationwide Pharmacies Ltd was registered with CQC on 31 January 2012 and has a registered manager. A registered manager is a person who is registered with the CQC to manage the service. Like registered services, they are 'registered people'. Registered persons have legal responsibility for meeting the requirements in the Health and Social Care Act 2008 and associated regulations about how the provider is run.

The provider is registered to provide the regulated activities:

- Treatment of disease, disorder or injury
- Transport services, triage and medical advice provided remotely.

How we inspected this provider

Before visiting on 25 October 2019, the service confirmed they had taken the actions detailed in their action plan. We met with the Registered Manager and Superintendent Pharmacist who was also an independent prescriber. We reviewed information given to us by the service, including changes to prescribing policies and procedures. We also reviewed documents relevant to the management of the service. During our visit we saw a random sample of patient records to ensure the new operating model was embedded and patients were receiving safe care and treatment in accordance to regulations.

All were relevant to demonstrate the service had addressed the breach of regulation identified at the inspection of April 2019.

Are services safe?

When we inspected Nationwide Pharmacies Ltd in April 2019 we identified concerns relating to:

- The management of medicines, notably asthma medicines and Class 4 and 5 controlled opiate medicines such as codeine and dihydrocodeine.
- We also identified weaknesses in the system to manage patient identity checks. These checks were not fully effective in particular for patients being prescribed medicines liable to abuse, overuse or misuse or medicines that require ongoing monitoring.

At the inspection undertaken on 25 October 2019 we found the service had made significant improvements to address the concerns previously identified.

Prescribing safely

Following the April 2019 inspection, we saw the provider had instigated a series of significant improvements to improve the safety of prescribing. The provider advised this had resulted in a complete change in the operating model, was regularly reviewed alongside an action plan and took approximately three months to complete.

We saw the provider had revised and strengthened the processes and supporting systems when the GP prescribed medicines for the care, treatment and management of asthma and a range of medicines for pain relief which included opiates (such as codeine and co-codamol). For example:

- Prior to a prescription being issued, we saw access to the patients Summary Care Record (SCR) was now compulsory. (SCR is an electronic record of important patient information, created from GP medical records).
- Once the medical questionnaire had been completed, a letter was now sent to the patient's GP (now all recorded and verified using information from SCR) to inform the patient's GP of the diagnosis and treatment proposed by the Nationwide Pharmacies GP. The website allowed patients to make a preferred medicine selection and place an order for medicines independently of the screening questions and subsequent clinical consultation. The GP would only issue a private prescription, this was often different to the preferred medicine the patient initially requested, if the medicine was deemed clinically necessary following a consultation.
- The prescription was then placed on hold and the patient's GP was asked to respond to the letter within

two working days to provide their comments. Should the patient's GP fail to respond within the time frame given, the Nationwide Pharmacies GP would then make a prescribing decision based on the information and evidence that the patient has provided. On our review, we saw the new processes had been embedded, we saw examples of medicines requested which had been issued (with the patient's GP approval) and also medicines requests which had been declined, for example declined because they did not consent to access to the SCR or their GP highlighted a concern.

- This amended process was now reflected within the terms and conditions on the Nationwide Pharmacies website. The website now informed patients about the compulsory access to the SCR and the correspondence sent out to the patients GPs. We also saw the website included the reason why these changes had been made and a direct link to the updated regulations and guidance for medicines which are liable to abuse, overuse or misuse or medicines that require ongoing monitoring or management, such as asthma medicines and opiate medicines.

During the October 2019 inspection, we also saw the processes and systems to prescribe a range of neuropathic pain relief medicines (such as dihydrocodeine, pregabalin and gabapentin), which are Controlled Drugs, had been strengthened. For example:

- The operating model for asthma medicines and opiate medicines was used as a shell for prescribing neuropathic pain relief medicines, specifically access to the SCR and contact with the patient's GP.
- The GP could only prescribe from a set list of medicines which the provider had risk-assessed, this list included Controlled Drugs.
- Given the high-risk nature of these medicines, the new process for this set of medicines also included an additional safety feature, for example should the patient's GP fail to respond within the given time frame (two days), a second attempt to contact the GP was made by telephone and the patient was informed of the outcome of the conversation. Unless positive contact is made with the patients GP, a prescription was not issued.

Are services safe?

On our review, we saw the new processes had been embedded, we saw examples of neuropathic pain relief medicine requests which had been issued and also requests which had been declined.

- Furthermore, we saw all medicines prescribed to patients from online consultation forms were monitored by the GP and superintendent pharmacist to ensure prescribing was evidence based. This included monitoring the prescribing of Class 4 and 5 controlled opiate medicines and neuropathic pain relief medicines for example, audits for unusual prescribing, quantities, dose, formulations and strength.

Information to deliver safe care and treatment

Following the April 2019 inspection, we saw the provider had added an additional verification check when completing patient identity checks.

- On registering with the Nationwide Pharmacies Ltd, and at each consultation patient identity was verified. The automated verification process included a search of

multiple data sources cross checking and verifying the name, age and address of the person. Accounts would not be activated, thereby allowing patients to request medicines, until identity verification was completed by the administrative team. The GP had access to the patient's previous records held by the service.

- These existing checks now included an additional safety check for patients who were prescribed medicines liable to abuse, overuse or misuse or medicines that require ongoing monitoring or management. These patients were now required to provide photo identity such as driving licence or passport. During the inspection, we saw these documents were uploaded to the patients encrypted account area, leaving a full audit trail for future reference. We also saw the storage of patient information and photographic identify complied with the providers information governance policies.

These actions were now ensuring that requirements related to the safe delivery of services were being met.