

SH24 C.I.C.

SH:24

Inspection report

2 Whitehorse Mews
37 Westminster Bridge Road
London
SE1 7QD
Tel: 02076202250
Website: www.sh24.org.uk

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Overall summary

Letter from the Chief Inspector of General Practice

We carried out an announced focused inspection at SH: 24 on 25 April 2018 to follow up on breach of regulation found during the previous inspection.

We previously inspected SH: 24 on 12 July 2017. The full comprehensive report of this inspection can be found by selecting the 'all services' link for SH:24 on our website at www.cqc.org.uk.

SH: 24 is a community interest company that aims to improve access to sexual and reproductive health care through the provision of online sexual and reproductive health services. The services include testing for HIV, syphilis, chlamydia and gonorrhoea and the prescription of oral contraceptives and treatment of chlamydia.

Our findings in relation to the key question was as follows:

Are services safe? – We found the service was providing a safe service in accordance with the relevant regulations. Specifically:

- A new system was in place to verify service user age to fulfil the age limitation requirements.

Professor Steve Field CBE FRCP FFPH FRCGP

Chief Inspector of General Practice

Summary of findings

The five questions we ask about services and what we found

We always ask the following five questions of services.

Are services safe?

We found that this service was providing safe care in accordance with the relevant regulations.

At our previous inspection on 12 July 2017 we found the service was not providing safe care in accordance with the relevant regulations and issued a requirement notice in relation to:

- The service did not have processes in place to check the identity of service users.

At this inspection, 25 April 2018, we found the service had addressed the issues identified at the last inspection.

- A new system was in place to ensure verification of service user age to fulfil the age limitation requirements. This was an interim arrangement until access to the NHS patient record system was achieved.

SH:24

Detailed findings

Background to this inspection

SH: 24 is an online sexual health service, developed with grant funding from Guys and St Thomas's NHS Foundation Trust charity and delivered in partnership with the NHS. SH:24 has contracts with a range of organisations, including NHS Trusts and 18 local authorities to provide people with free sexually transmitted infection (STI) test kits, information and advice, 24 hours a day. The service can also offer online treatment for Chlamydia infection and contraceptive pills (fulfilled by post).

SH:24 was registered with the Care Quality Commission (CQC) on 26 September 2016 and have a registered manager in place. A registered manager is a person who is registered with the Care Quality Commission to manage the service. Like registered providers, they are 'registered persons'. Registered persons have legal responsibility for meeting the requirements in the Health and Social Care Act 2008 and associated Regulations about how the service is run.

How we inspected this service

This inspection was carried out by a CQC lead inspector. The team also included a second CQC inspector with remote support from a GP specialist advisor.

During the visit at the headquarters we:

- Spoke with a range of staff.
- Reviewed organisational documents.

Why we inspected this service

We carried out this inspection under Section 60 of the Health and Social Care Act 2008 as part of our regulatory functions. This inspection was planned to check whether the service had responded to the previously identified breach of regulation 12 of the Health and Social Care Act 2008.

Are services safe?

Our findings

We found that this service was providing safe care in accordance with the relevant regulations

Keeping people safe and safeguarded from abuse

At our previous inspection on 12 July 2017 we found the service was not providing safe care in accordance with the relevant regulations and issued a requirement notice in relation to:

- The service prescribed oral contraception and treatment for chlamydia with (antibiotics) to patients aged over 18. However, processes in place did not provide full assurance that all service users were over 18 as formal identity checking mechanisms were not in place to verify service user age. The service had recognised the risk and was making arrangements to access the NHS patient record system which would allow it to identify most users accessing the service. The service was given a timeframe of four to six weeks at the time of the inspection by NHS Digital.

At this inspection, 25 April 2018, we found the service had addressed the issues identified at the last inspection.

- A new system was in place to verify service user age to fulfil the age limitation requirements. This was a third party service that helped to verify the identity of people quickly. The service explained that users name, address and date of birth were entered onto the system which checked with 33 million (peoples) live data and provided a RAG (red, amber and green) rating. If the data provided by a service user matched (green) other data sources then a clinician working for the service was able to process the order. If some data were missing (amber) the service was required to message or call the service user to verify information before they were able to process the order. If the system was unable verify the

data supplied by the user (red) then the service was unable to process the order on the system. The service also shared some concerns about this process. They told us that because the service had been developed to remove barriers to access sexual health services particularly to vulnerable groups there was a chance that these groups may be excluded. This was because service users from vulnerable groups such as the homeless may not be on any registers that were used to match the information provided. However, CQC were currently consulting with (British Association of Sexual Health and HIV (BASHH) and Faculty of Sexual and Reproductive Healthcare (FSRH). BASHH and FSRH were working on updates to their guidance on 'verification of user identification in online specialist sex and reproductive health services' and SH:24 were awaiting the outcome of the consultation/updates.

- The current process to verify identity was an interim arrangement as the provider was seeking access to the NHS patient record system which would allow the service to identify patients on the NHS system. At the time of our previous inspection it was anticipated to take six weeks. However, at this follow up inspection we were told that it had taken longer than expected. There was a 10 step process to access the NHS system and the service had completed steps one to eight. The next step (nine) was the live testing and sign off (step 10) before gaining full access. The service expected full integration to the NHS system within the next three weeks.
- Following this inspection the provider told us that having passed the NHS Digital's technical standards they were awaiting written confirmation from NHS Digital for the go live interface date with the NHS Spine. The service had contacted NHS Digital and were advised that go live dates would be approved in the next few days.