

# Inspection Report

15 March 2022



## Medical Prescription Services (MPS)

Type of service: Independent Medical Agency (IMA)  
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Assurance, Challenge and Improvement in Health and Social Care

Information on legislation and standards underpinning inspections can be found on our website <https://www.rqia.org.uk/>, [The Independent Health Care Regulations \(Northern Ireland\) 2005](#) and the [Minimum Care Standards for Independent Healthcare Establishments](#)

## 1.0 Service information

<b>Organisation/Registered Provider:</b> Medical Prescription Services Ltd	<b>Registered Manager:</b> Dr Sarah Winnett
<b>Responsible Individual:</b> Mr Jonathan Tribe	
<b>Person in charge at the time of inspection:</b> Mr Jonathan Tribe	<b>Date registered:</b> 30 April 2021
<b>Categories of care:</b> Independent Medical Agency (IMA) Private Doctor (PD)	
<b>Brief description of how the service operates:</b> Medical Prescription Services Ltd is registered with the Regulation Quality Improvement Authority (RQIA) as an independent medical agency (IMA) with a private doctor (PD) category of care and is an online medical service that provides healthcare to patients through patient group directions (PGDs) provided in selected pharmacies in Northern Ireland (NI).	

## 2.0 Inspection summary

An announced inspection was undertaken on 15 March 2022.

Medical Prescription Services Ltd (MPS) does not see patients face to face in NI and all information regarding this inspection was submitted to RQIA electronically before the inspection.

The purpose of this inspection was to assess progress with any areas for improvement identified during and since the last care inspection and to examine a number of aspects of the agency from front-line services to the management and governance oversight across the organisation.

Examples of good practice were evidenced in relation to the monitoring and updating of the private doctor's details; staff training and development; the provision of information to patients allowing them to make an informed decision; the governance and oversight of PGDs and the application of a community pharmacy audit.

No immediate concerns were identified in relation to the delivery of services. No areas of improvement were identified during this inspection.

### 3.0 How we inspect

RQIA's inspections form part of our ongoing assessment of the quality of services. Our reports reflect how a service was performing at the time of our inspection, highlighting both good practice and any areas for improvement. It is the responsibility of the service provider to ensure compliance with legislation, standards and best practice, and to address any deficits identified during our inspections.

Before the inspection a range of information relevant to the agency was reviewed. This included the following records:

- notifiable events since the previous care inspection
- the registration status of the establishment
- written and verbal communication received since the previous care inspection
- the previous care inspection report

MPS is based in England, therefore as per an agreed RQIA protocol for the inspection of IMAs; the inspection was conducted in the offices of RQIA. A request for supporting documentation was forwarded to the provider prior to the inspection. The requested information was submitted to us electronically. Mr Jonathan Tribe, Responsible Individual, was requested to be available for contact via the telephone on 15 March 2022, at an agreed time.

During the inspection, records were examined relating to the following areas:

- staffing
- recruitment and selection
- safeguarding
- information provision
- patient consultation
- practising privileges
- clinical records
- management and governance arrangements

Following a review of all the submitted documents, Mr Tribe was contacted at the conclusion of the inspection to discuss any issues and to provide feedback on the inspection findings.

### 4.0 What people told us about the service

We were unable to meet with patients on the day of the inspection. We discussed with Mr Tribe how the service obtains patient feedback. Mr Tribe advised that the service had distributed questionnaires to patients in the past year however no patients had responded.

## 5.0 The inspection

### 5.1 What has this service done to meet any areas for improvement identified at or since last inspection?

The last inspection to MPS was undertaken on 9 September 2020 by a care inspector; no areas for improvement were identified.

## 5.2 Inspection findings

### 5.2.1 How does the IMA ensure that staffing levels are safe to meet the needs of patients?

Mr Tribe confirmed that there was sufficient staff in various roles to fulfil the needs of the agency and patients and that induction programme templates were in place relevant to specific roles within the agency.

A review of relevant documentation evidenced that a robust system is in place for undertaking, recording, and monitoring all aspects of staff supervision, appraisal, and ongoing professional development.

Dr Winnett, Registered Manager, is the only wholly private doctor working in the agency. A medical practitioner is considered to be wholly private doctor if they do not have a substantive post in the NHS in Northern Ireland (NI) or are not on the General Practitioner (GP) performers list in NI. A review of the details of Dr Winnett evidenced the following:

- confirmation of identity
- current General Medical Council (GMC) registration
- professional indemnity insurance
- qualifications in line with services provided
- ongoing professional development and continued medical education that meets the requirements of the Royal Colleges and GMC
- ongoing annual appraisal by a trained medical appraiser
- an appointed Responsible Officer (RO)
- arrangements for revalidation with the GMC

A review of training records submitted prior to and following the inspection evidenced that there was a system in place to ensure that Dr Winnett undertakes appropriate training to fulfil the duties of her role.

Completed induction records for Dr Winnett were submitted to RQIA and reviewed before the inspection.

Mr Tribe told us that Dr Winnett is aware of her responsibilities under [GMC Good Medical Practice](#).

Sufficient staff were in place to meet the needs of the agency and patients.

### 5.2.2 How does the IMA ensure that recruitment and selection procedures are safe?

Mr Tribe told us that private doctors recruited are subject to the recruitment policy and procedures. It was established that there were robust recruitment and selection policies and procedures that adhered to legislation and best practice that ensured suitably skilled and qualified staff work in the agency.

A review of recruitment records of the private doctor evidenced that relevant records had been sought; reviewed and stored as required.

The recruitment of the private doctor complies with the legislation and best practice guidance.

### 5.2.3 Does the IMA meet current best practice guidance for the management of safeguarding concerns?

A review of the arrangements for safeguarding evidenced that a policy and procedure was in place for the safeguarding and protection of adults and children at risk of harm.

The agency's safeguarding policies and procedures reviewed prior to the inspection were found to be in accordance with the current regional guidance. The policies included the types and indicators of abuse and distinct referral pathways in the event of a safeguarding issue arising with an adult or child.

Mr Tribe told us that the private doctor has received safeguarding training appropriate for her role and in keeping with [RQIA training guidance](#), and this is recorded in the individual's continuous professional development (CPD) log.

It was also confirmed that the safeguarding lead had completed formal training in safeguarding adults in keeping with the Northern Ireland Adult Safeguarding Partnership (NIASP) training strategy (revised 2016).

Mr Tribe confirmed that there were no safeguarding issues identified since the previous inspection.

The safeguarding arrangements evidenced that robust procedures are in place to ensure that any safeguarding issue identified would be managed in accordance with best practice guidance.

### 5.2.4 Is the IMA fully equipped and are the staff trained to manage medical emergencies?

As previously discussed MPS does not offer face to face services to residents of NI and PGDs are provided in selected pharmacies in NI. Mr Tribe told us that the agency ensures arrangements are in place for those pharmacists who provide PGDs to have an awareness of actions to be taken in the event of a medical emergency.

### **5.2.5 Does the IMA adhere to infection prevention and control (IPC) best practice guidance?**

As discussed this service does not offer face to face consultations to patients.

Mr Tribe told us the agency ensures arrangements are in place for those pharmacists providing PGDs to have an awareness of IPC and that they adhere to regional guidance.

### **5.2.6 Are patient group directions (PGDs) being effectively managed?**

Mr Tribe confirmed that for each PGD there are governance arrangements with clear lines of responsibility and accountability and that PGD's are developed in accordance with The Human Medicines Regulations 2012.

Mr Tribe told us that all PGD's have been authorised by a pharmacist registered with the Pharmaceutical Society of Northern Ireland (PSNI).

A review of a PGD provided by electronic mail prior to inspection and discussion with Mr Tribe evidenced that a process is in place to ensure PGD's are updated in keeping with best practice guidance.

Arrangements are in place to ensure that PGD's are being effectively managed.

### **5.2.7 Is the pathway of care for patients being managed safely?**

A review of the information about the services provided by the agency found that it accurately reflected the type of PGDs provided and was in line with GMC Good Medical Practice.

Mr Tribe confirmed the agency's website contained comprehensive information regarding the type of treatments provided. The information provided to patients and/or their representatives was written in plain English.

Discussion with Mr Tribe and review of records confirmed that information provided to patients affords a transparent explanation of their condition and any treatment, investigation or procedure proposed. The information also includes any risks, complications, options and the expected outcome of the treatment.

Mr Tribe confirmed that it is the responsibility of the pharmacist to assess mental capacity. Should any concerns be identified in relation to mental capacity Mr Tribe confirmed that services would not be offered and the patient would be signposted to their GP.

It was confirmed that robust systems are in place to ensure the pathway of care for patients is being managed safely.

### 5.2.8 Are records being effectively managed?

The arrangements for the management of records were reviewed to ensure that records are managed in keeping with legislation and best practice guidance.

A policy and procedure for the management of clinical records which details the arrangements for the creation; storage; transfer; disposal of and access to records was in place.

Mr Tribe confirmed that the agency is aware of the [General Data Protection Regulation \(GDPR\)](#) that came into effect during May 2018 and that they are compliant with this legislation.

Mr Tribe advised that a system is in place to ensure that the electronic clinical records completed by the private doctor, is in line with best practice. This system has different levels of access depending on staff roles and responsibilities and the system is password protected and routinely backed up.

There are systems in place to audit the completion of clinical records and it was confirmed that an action plan will be generated to address any identified issues. The outcome of the audit will be reviewed through the agency's clinical governance structures.

MPS is registered with the Information Commissioner's Office (ICO).

It was confirmed that the arrangements for records management are in accordance with legislation, standards and best practice guidance [GMGR records management](#).

### 5.2.9 Are patients treated with dignity and respect and fully involved in decisions affecting their treatment, care and support?

Mr Tribe and colleagues told us that the patient's dignity was respected at all times during the consultation and treatment process and confirmed that the community pharmacy premises were assessed for suitability for providing the service to patients.

Patients are asked for their comments in relation to the quality of treatment provided, information and care received. Every patient at the conclusion of their medical screening are requested to complete an online survey. This information is collated monthly and reviewed by the management team. In addition, there is a direct link from the patients account page to provide feedback which goes through to a dedicated MPS email address and all feedback is processed by management. Mr Tribe confirmed, he and the medical director discuss all feedback during a monthly management meeting.

The information received from patient feedback questionnaires is collated into an annual summary report which is made available to patients and other interested parties to read online on the agency's website.

MPS also seeks the views of pharmacists who provide PGDs.



**5.2.10 Are there robust systems and processes in place to provide assurance to senior management of the operational performance of the organisation?**

Discussion with Mr Tribe and review of the governance arrangements in place demonstrated there were systems and processes to provide assurance to senior management of the operational performance of the organisation.

A range of the audit reports were examined which evidenced that where improvement is identified, action outcomes are developed and compliance is monitored to ensure improvement is achieved and sustained.

Mr Tribe confirmed that communication systems are in place within the organisation and staff are aware of who to speak to if they had a concern. Mr Tribe demonstrated knowledge of the day to day functions of MPS.

The only mechanism for a medical practitioner to work in a registered IMA is either through direct employment by the agency or under a practising privileges agreement. Practising privileges can only be granted or renewed when full and satisfactory information has been sought and retained in respect of each of the records specified in Regulation 19 (2), Schedule 2 of The Independent Health Care Regulations (Northern Ireland) 2005, as amended.

A practising privileges policy and procedure was in place which outlined the arrangements for the application, granting, maintenance, suspension and withdrawal of practising privileges. A review of documentation confirmed that there was a written agreement between Dr Winnett and MPS setting out the terms and conditions which had been signed by both parties during February 2022.

All medical practitioners working within the agency must have designated RO. In accordance with the requirements of registration with the GMC all doctors must revalidate every five years. The revalidation process requires doctors to collect examples of their work to understand what they are doing well and how they can improve. Experienced senior doctors work as RO's with the GMC to make sure doctors are reviewing their work. As part of the revalidation process, RO's make a revalidation recommendation to the GMC. Where concerns are raised regarding a doctor's practice information must be shared with their RO who then has the responsibility to share this information with all relevant stakeholders in all areas of the doctor's work. A review of documentation evidence that Dr Winnett has a designated external RO.

It was established that a range of policies and procedures were available to guide and inform staff. The policies and procedures were indexed, dated and would be systematically reviewed at least every three years. Mr Tribe told us staff were aware of the policies and how to access them.

A complaints policy and procedure was in place which is made available to patients/and or their representatives on the agency's website. Mr Tribe demonstrated a good awareness of complaints management. It was established that no complaints relating to the provision of services in NI had been received since the previous inspection. Mr Tribe explained the complaints management system, which included a continuous process of ongoing audit.

A review of the arrangements in respect of the management of notifiable events/incidents found that a robust incident management policy and procedure was in place to guide and inform staff.



Mr Tribe confirmed that there had been no notifiable incidents affecting patients who reside in NI. Mr Tribe outlined the governance systems in place to audit, review and identify any learning coming from any incident and/or near misses. A trend analysis is completed quarterly and where recommendations were made, areas were re-audited, with the outcome recorded.

Risk management procedures were in place to ensure that risks were identified, assessed, and managed.

Mr Tribe demonstrated that a system was in place to ensure that urgent communications, safety alerts, and notices were reviewed, actioned and, where appropriate, promptly made available to key staff.

Arrangements were in place to monitor the competency and performance of all staff and report to the relevant professional bodies per their guidance. There were systems in place to check the registration status of all health care professionals with their appropriate professional bodies on an annual basis.

A whistleblowing/raising concerns policy was available which provided help to staff to make a protected disclosure, should they need or wish to. Mr Tribe told us that staff knew who to contact should they have concerns or needed to discuss a whistleblowing matter.

Mr Tribe demonstrated a clear understanding of his role and responsibility in accordance with legislation. Information requested by RQIA had been submitted within specified timeframes. Mr Tribe told us that the Statement of Purpose and Patient's Guide were kept under review, revised and updated when necessary and available to patients on request.

Mr Tribe told us the RQIA certificate of registration was up to date and displayed in the agency's offices. Insurance documentation reviewed evidenced that current insurance policies were in place.

The governance structures within the agency provided the required level of assurance to the senior management team.

#### **5.2.11 How does a registered provider who is not in day to day management of the IMA assure themselves of the quality of the services provided?**

Where the business entity operating an establishment is a corporate body or partnership or an individual owner who is not in day to day management of the agency, unannounced quality monitoring visits by the registered provider must be undertaken and documented every six months; as required by Regulation 26 of The Independent Health Care Regulations (Northern Ireland) 2005.

Mr Tribe is the named individual with overall responsibility for the day to day management of the agency therefore the unannounced quality monitoring visits by the registered provider are not applicable.

### 5.2.12 Does the IMA have suitable arrangements in place to record equality data?

The arrangements in relation to the equality of opportunity for patients and the importance of staff being aware of equality legislation and recognising and responding to the diverse needs of patients was discussed with Mr Tribe who advised that equality data collected will be managed in line with best practice.

## 6.0 Quality Improvement Plan/Areas for Improvement

	Regulations	Standards
<b>Total number of Areas for Improvement</b>	0	0

This inspection resulted in no areas for improvement being identified. Findings of the inspection were discussed with Mr Tribe, Responsible Individual, as part of the inspection process and can be found in the main body of the report.



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