**PIPSIG drop-in – Q&A with Suzette Farrelly at the CQC**

**CQC resources**

* <https://www.cqc.org.uk/guidance-providers/online-primary-care>
* [https://www.cqc.org.uk/guidance-providers/scope-registration](https://us02st1.zoom.us/web_client/bai5dum/html/externalLinkPage.html?ref=https://www.cqc.org.uk/guidance-providers/scope-registration" \t "_blank)
* <https://www.cqc.org.uk/guidance-providers/all-services/join-our-online-community-providers-professionals>
* <https://www.cqc.org.uk/guidance-providers/online/additional-prompts-online-healthcare-providers-primary-care>
* <https://www.cqc.org.uk/news/releases/signs-improvement-some-concerns-remain-regarding-providers-online-gp-services>

1. ***What is CQC's view on consultants who work remotely only? (i.e. working from home, video conferencing only, not affiliated to any CQC registered premises)***

* Psychological input only- no medication- not registered- out of scope.
* If consulting and results in prescribing - register
* ADHD assessment result in treatment by GP- grey area
* Remote or face to face no difference- register as individual
* If working as part of CQC reg establishment and also by self- need to register for the self part
* Medico-legal is out of scope – You do not need to register

1. ***Is it acceptable to send an email or hold a telephone or video consultation with a patient from a home office?***

* Yes absolutely

1. ***I’m a full time independent psychiatrist. No NHS work (left 4 years ago) works with 2 private organisations, both with their own CQC registration one organisation acts as a designated body for me and provides indemnity for work (employed by this organisation); the other is purely a source of work (not employed by this organisation) - I have my own indemnity via MPS for this organisation Do I need individual CQC registration? If I wasn’t employed by one, would I then need registration?***

* Are you working independently or under an organisation?
* If work is sourced for you it is you that needs to register.
* ‘Employed’ does not mean the legal definition w.r.t CQC, it means working within the structures and systems of an organisation

1. ***Is CQC registration needed if you are employed by the nhs who is also your your designated body? What if the nhs trust is not your designated body? What is meant by treatment for disease, disability and injury? Is providing a consultation classed as ‘treatment’ when the GP is the one prescribing? What if you are treating though psychological therapies? I’m mindful that psychotherapists and psychologists do not need CQC registration for example.***

* Register if you are working for yourself
* Diagnostics
* Medical psychotherapists out of scope
* If have registration with both GMC and psychotherapy body – choose what treatment is under – if under psychotherapy body no need to register

1. ***If a private practice routinely offers remote (video/telephone) consultations in addition to face to face consultations, do they need to register with the CQC? (For example, a video consultation for a parent interview as part of an ADHD assessment, where the subsequent child interview is face to face).***

* Yes

1. ***Are there any specific requirements or permissions for a clinic space to be used for psychiatric consultations? I have found a local counselling room used by psychologists.***

* No

1. ***Process of registering with CQC if you are Working on your own or in a team of under 10 self employed staff working out of a premises ?***

* Your choice

1. ***I'd be grateful if you could give some guidance on if you need to register with the CQC for independent work, if you also work in the NHS. And if medical psychotherapists conducting assessments and therapy need to register with the CQC.***

* Answered previously
* It takes around 16 weeks to have registration completed
* Need DBS under 1 year

1. ***Having left the NHS and now working for an organisation (Psychiatry-UK) that is CQC registered, do I need additional registration with the CQC to start seeing patients fully independently, or is my on-going link to the CQC through Psychiatry-UK sufficient?***

* You need additional registration

1. ***Can SAS Doctors approaching retirement work as PIP?***

* This is not up to the CQC - yes, technically they can, in practice medical Insurance companies tend not to agree to cover costs unless the doctor Is on the specialist register/has held a substantive consultant role. Would also need to get agreement from Indemnity insurance provider. Private hospitals tend not to agree to giving SAS doctors practising privileges.

1. ***Does a doctor who is on the specialist register, wanting to open a private clinic working from an office space or online, not employing any staff, who is otherwise employed by a designated body, based in England, need to register with the CQC?***

* You need to register

1. ***For the CQC fees does a remote service count as 1 location or multiple locations (e.g. if has 5 remote clinicians - is this 5 locations?)***

* It is not a straight forward answer.  All providers require one location, whether the other locations are noted on the statement of purpose or registered in their own right would depend on if the activity is carried on form their – so are records kept there, do they visit every day are staff working at that location only working there.  If it is an individual who visits a number of clinics to see patients then only one location is required.  The applicant should consider the information available in [What is a location](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cqc.org.uk%2Fguidance-providers%2Fregistration%2Fwhat-location&data=05%7C01%7CSigs%40rcpsych.ac.uk%7C154a8f9808e046a71c1c08dafd227a3e%7C75aac48a29ab4230adac69d3e7ed3e77%7C0%7C0%7C638100621772027190%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Q7%2F3E4d1Q0DbaSUs36y59NUaVrlqoy3AaOFM967jhMo%3D&reserved=0)

1. ***Just to definitely confirm that all independent work which is medicolegal does not fall within scope of CQC and does not need registration with them.***

* They do not need to register

***Other helpful points:***

* CQC registration is specific to jurisdiction - England registration Is different to Wales, Scotland etc so be careful seeing patients who live In an area where you are not technically registered. May be Important for doctors working near borders e.g. Bristol.