

## Introduction

A growing body of evidence shows that patient-led, remotely overseen medical care is safe and leads to better patient health. DBL Carefree's medical providers continue to lead the way in making it as easy as possible for patients to look after themselves, and get the treatment they need.

Our objective and priority is to provide members with quick, secure, and discrete medical services and advice—and we undertake all reasonable measures to ensure these things. The objective of these policies and procedures is in part to generally ensure that DBL Carefree meets CQC's national standards and requirements, and protects the public while delivering its medical-related services.

This policy applies to and governs DBL Carefree, its owners, directors, officers, employees, and contracted medical providers, and its operations.

## UK Registered Doctors and Pharmacies

DBL Carefree's service includes providing information, advice, counselling, testing and treatment for a range of medical conditions. Services are provided by qualified doctors registered with the UK's General Medical Council. All DBL Carefree participating medical providers are trained to provide online care across the spectrum of services DBL offers, and all are trained in providing prescription medicine online, so Members may receive care from any member of the team at different times.

Participating doctors are individually responsible for the prescriptions they issue, and participating registered pharmacists are responsible for dispensing. All prescriptions for Members are dispensed by an NHS pharmacy regulated by the [General Pharmaceutical Council](#).

**Conditions to Provider Participation** — All participating medical providers, as a condition to participation, must agree to:

1. Remain GMC registered at all times, and notify DBL Carefree immediately of any change in their registration or licensure.
2. Act in Members' best interests at all times, as required by law.
3. Follow up with some patients as necessary or appropriate to ensure quality care.
4. Provide their healthcare products and services to DBL Members at discounted rates of up to 20 percent below the standard or published rate they offer to the general public (this condition does not apply to medical doctors).
5. Take professional responsibility for each Member patient DBL Carefree services to the same extent as the provider would if he or she were independently treating a patient face-to-face.
6. Provide a professional and transparent service in compliance with General Medical Council Guidelines on remote prescribing, and essential standards of quality and safety as interpreted by England's healthcare inspectorate, the Care Quality Commission, and clinical best practice in England.
7. Volunteer their name and General Medical Council professional registration number when prescribing medicines and communicating with Member patients.

8. Prescribe medicines only when in their professional judgment it is in the Member's best interests to receive the requested medicine.
9. Refuse to prescribe medicines when in their professional judgment they believe it is *not* in a Member's best interest to receive such medicines without the benefit of a face-to-face consultation or a referral.
10. Take all reasonable steps to protect Members' personal information contained in the Online Electronic Health Record or otherwise revealed by the Member.

### **Good Governance**

To ensure effective governance, including quality assurance and auditing, DBL Carefree implements, maintains, and continuously evaluates systems and processes that assess, monitor and drive improvement in Member services and experience, and their quality and safety. These systems and processes must assess, monitor and mitigate any risks to Member/patient health, safety and welfare.

In addition, DBL Carefree securely maintains accurate, complete and detailed records on each Member/patient, personnel and participating provider records, and records on management of regulated activities.

DBL Carefree carefully examines Member complaints and other feedback received to continually evaluate the service and drive improvement, and dedicates the resources and personnel needed to do so promptly and effectively.

When requested, DBL Carefree shall provide a written report to CQC describing its methodology for assessing, monitoring, and improving service quality and safety.

### **Professional Standards and Qualifications**

As required under Section 10 of the Health and Social Care Act 2008, DBL Carefree shall always maintain its registration with the [Care Quality Commission](#), the English regulator of health care services, which permits the company's participating medical professionals to prescribe medicines and testing services without meeting patients face to face. DBL Carefree shall prominently and appropriately disclose its Care Quality Commission registration number (reg. no. \_\_\_\_\_) on its website to ensure users of the service know of and can trust the company's authority.

DBL Carefree shall produce, maintain and appropriately update its statement of purpose in accordance with the requirements of CQC Regulation 12 and its Schedule 3. DBL Carefree shall maintain a record of its statement of purpose and ensure its availability for review as appropriate.

DBL Carefree's owners and operating principals and directors shall conform to the requirements of Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulations 4, 5, and 6, be of good character, be capable of performing tasks and functions intrinsic to their respective operational positions, be competent and fully qualified to manage, perform, or conduct the regulated activity undertaken by the enterprise, be capable of ensuring the quality and safety of care and applicable standards, and be prepared to provide evidence (documents) verifying these performance characteristics and capabilities. DBL Carefree shall further nominate an appropriate person with the foregoing capabilities to be responsible for supervising management of the regulated activity—thus ensuring that the needs of Members (users of the service) are met.

All doctors participating in DBL Carefree’s online medical service program shall comply with the General Medical Council Guidelines on remote prescribing and the Essential Standards of Quality and Safety as interpreted by the Care Quality Commission, and DBL Carefree provides links to these standards on its website.

DBL Carefree’s owners, operating principals, directors, nominated managers, and participating medical providers shall conform to the requirements of Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, and must ensure that they meet every regulation for each regulated activity they or DBL Carefree provide, and that all registered people comply with the regulations’ requirements.

### **Staff, Personnel — Qualifications, Fitness**

DBL Carefree’s owners, operating principals, directors, nominated managers, and participating medical providers shall recruit, properly investigate, hire, train, and support suitable numbers of competent, experienced, and properly credentialed staff to accommodate all Members’ service needs at all times. All personnel must be able to provide care and treatment appropriate to their role, and allow the organisation to fulfill all applicable requirements of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. The company shall monitor and evaluate staff regularly (at least every six months) to verify, support and ensure their professional growth, credentialing status, and ability to meet specific job requirements.

When requested, DBL Carefree shall provide documentation to CQC illustrating personnel credentials and training, and demonstrating each staff member’s ability to conform to professional standards.

DBL Carefree’s owners, operating principals, directors, nominated managers, and participating medical providers shall not hire or retain any individual on staff who is unfit for or incapable of performing the position’s requirements or conforming to all requirements of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 applicable to the job in question.

The company’s arrangements for removing and dealing with staff members unfit or unable to carry out their duties include the following:

- Notifying all staff in writing when they are hired that employment is subject to termination for cause if employee is determined by DBL Carefree’s personnel director to lack the credentials, training, or experience to meet the requirements of the job or conforming to regulations governing the job in question.
- Including a similar provision in any staff member’s employment agreement.
- Clearly explaining this condition to ongoing employment in any employee or human resources manual.
- Providing personnel a written notice detailing the grounds for any determination of unfitness made by the personnel director and any related termination, and affording staff member a sufficient opportunity within a reasonable time to present evidence demonstrating that he or she is in fact fit for the position.
- Requiring a vote of a majority of senior company officers or directors to confirm and implement any employee’s termination for unfitness.

### **Patient-Centered Care**

DBL Carefree's owners, operating principals, directors, nominated managers, and participating medical providers shall undertake all necessary and appropriate steps to ensure that Members/Patients each:

- Individually receive appropriate person-centered care and treatment based on an assessment of their individual needs and preferences, and that Members understand and make informed decisions about their care and treatment options, and have the requisite capacity to do so.
- Are treated with respect and dignity, and assured appropriate privacy, at all times while receiving care and treatment.

### **Consent for Care**

DBL Carefree's owners, operating principals, directors, nominated managers, and participating medical providers shall undertake all necessary and appropriate steps to ensure that Members/Patients each give their consent for any care or treatment provided, that a record of such consent is created and maintained, and that such consent is given voluntarily, knowingly and lawfully, and that any individual acting on behalf of DBL Carefree who procures such consent understands the care or treatment for which consent is sought and is able to communicate it fully to the Member/patient.

### **Safe Care and Treatment**

DBL Carefree's owners, operating principals, directors, nominated managers, and participating medical providers shall undertake all necessary and appropriate steps to:

- Avoid risk of harm and prevent Members/patients from receiving unsafe care and treatment. DBL Carefree and its participating medical providers must assess risks to Members' health and safety during any care or treatment, ensure that staff are qualified and competent to protect Member/patient safety, and implement processes, procedures and protocols to ensure the company can *demonstrate* that all reasonable steps for Member health and safety are taken.
- Safeguard Members/patients from suffering abuse, neglect, improper or degrading treatment, discrimination, unlawful restraint or denial of liberty. DBL Carefree and its participating medical providers must advance a zero-tolerance posture concerning these safeguards and implement robust procedures and processes to prevent, respond to, and investigate such abuse and improper treatment.
- Ensure that Members/patients understand and have access to the proper nutrition and hydration to sustain life and good health in conjunction with any treatment provided.
- Ensure that all equipment and medical facilities necessary to provide services to Members/patients (including communication equipment), or recommended for use by the Member, is suitable for the intended purpose, readily available, fully functional, and safe for use.

### **Candour in Treatment**

DBL Carefree's owners, operating principals, directors, nominated managers, and participating medical providers shall undertake all necessary and appropriate steps to:

1. Ensure that they and company personnel are always open and transparent with Members using DBL Carefree's services (and others acting lawfully on Members' behalf) about any care and

treatment provided or to be provided, and any adverse incident involving or affecting the care provided.

2. Truthfully, fully and timely inform members about any care-related incident or mishap or issue requiring Member's knowledge or consent, and provide reasonable support as appropriate.
3. Ensure that appropriate mechanisms are in place to permit and facilitate such openness and transparency with Members about their care and treatment, including mechanisms for conveying apologies and contrition.
4. Openly and fully accept responsibility, when known, for any failure, shortcoming, or negligence associated with the provision of care or giving rise to any adverse incident.
5. Encourage and permit appropriate investigation and disclosure when causation or responsibility for such failure, shortcoming or negligence is unknown.

### **Display/Publication of Performance Assessments**

Whenever DBL Carefree receives a CQC performance assessment of DBL's regulated activities, DBL shall prominently and conspicuously display the CQC's rating(s) of DBL's service activities on its website, using digital devices provided by CQC, and including links to the Commission's website and its listing of the rating. This published notice on DBL Carefree's website will contain all information required by the Commission in the disclosure, as provided by applicable Commission regulations.

### **Membership Applications**

DBL Carefree offers services to all UK and EU residents, and residents of any country in which offering online medical services is lawful. All applicants for membership are required to identify their country of residence as part of the online application. DBL Carefree informs all applicants who identify as residents of countries that do not permit online medical consultation—before processing their application or accepting their membership fee—that they are ineligible for membership under the laws of their country.

To register as a DBL Carefree eligible member applicant individuals must complete and submit DBL's online health questionnaire in accordance with the instructions provided, accept and agree to DBL's terms of service and privacy policy (a required part of the application), and pay the appropriate membership fee in accordance with the published membership fee schedule. All eligible member applicants are issued a membership number and password, which must be used on all communication with DBL's doctors. Members' uploaded health information is the basis of their online electronic health record with **DBL Carefree**.