

RCGP Scotland response to Scottish Government's Amendments to the regulation of independent health care consultation

RCGP Scotland welcomes the opportunity to respond to this consultation. As the membership body for general practitioners in Scotland, we exist to promote and maintain the highest standards of patient care.

We broadly welcome the need for further regulation in this space. GPs often see patients engaging with independent health services, who subsequently request that GPs undertake testing, referrals, prescribing, and other activities in support of the patient accessing the services of these agencies.

Currently, it can be difficult for a GP to determine whether such organisations are suitable or legitimate and therefore whether it would be appropriate for them to facilitate further treatment by referring or engaging with this process. This is also true of services offered mostly or entirely online, where the risks are potentially greater. This situation poses difficulties to both patients and GPs alike. Inadequate regulation of medical services, of any type, can lead to poor or adverse outcomes for patients. Appropriate regulation of these organisations should provide greater certainty and facilitate a better and safer experience for all involved.

In regard to independent medical agencies where services are provided by a medical practitioner, we would be supportive of the need for such organisations to be regulated by, and maintain registration with, Healthcare Improvement Scotland (HIS). Our understanding would be that this would not apply to GPs providing GMS services, who are technically independent contractors, but whose contracts are with the NHS, and this was not made entirely clear in the consultation.