

Dr David Geddes

Operations and Information
Directorate

Quarry House
Quarry Hill
Leeds
LS2 7UE

david.geddes@nhs.net

1st May 2019

To all holders of a GOS Contract

Dear GOS Contractor

NHS Record Keeping - Reminder for GOS contractors in England

As you will be aware, having appropriate record-keeping systems is both a professional duty (underpinning continuity and quality of care for patients) and one of the four key requirements for holding a GOS contract.

Unfortunately, record-keeping - including legibility - is also one of the areas which is most often found to be in need of improvement on contract compliance visits by NHS England.

Not only does this potentially put patients at risk, it also exposes the practice and practitioners to risk if there is a subsequent complaint. What is not recorded cannot easily be proven as having taken place and it is easy for both patients and practitioners to misremember consultations at a later date.

We are writing therefore to

- remind you of the importance of good record keeping as part of good clinical care
- share the template we use for assessing records for GOS contract compliance, and
- remind you of the importance of records audits for patients, practitioners and providers.

Best Practice

Both the College of Optometrists and the Association of British Dispensing Opticians issue guidance on best practice in record keeping as do the Optical Confederation representative bodies and insurers.

ABDO record keeping guidance can be found at

<https://www.abdo.org.uk/advice-guidelines/>

College of Optometrists record keeping guidance can be found at



<https://guidance.college-optometrists.org/guidance-contents/knowledge-skills-and-performance-domain/patient-records/>

For specific queries the representative bodies can be contacted on

ABDO mhalford@abdolondon.org.uk

AOP regulation@aop.org.uk

FODO optics@fodo.com

These are replicated in the *Quality in Optometry Framework* which we expect all providers to use to demonstrate GOS contract compliance.

GOS Contractual Requirements

When we carry out compliance visits to practices –normally when a new practice opens and then three-yearly on a random cycle thereafter - we usually draw a random sample of up to 10 records from the past 18 months and assess them against the domains attached (1).

The specific requirements on contractors relating to record keeping are set out in Clause 52 of your GOS contract attached (2). NHS England may take contractual action, which ultimately could include termination of the contract, in cases of non-compliance.

Record Keeping Audits

A good way of quality assuring your system is by regular audits. This also protects patients as any issues can be ironed out as they arise. The *Quality in Optometry Framework* contains a good example of how to do this at www.qualityinoptometry.co.uk

Further Information

If you have any queries about this letter, please do not hesitate to contact your Optical Confederation representative body or your NHS England Regional Team

The contents of this letter have been shared with the Optical Confederation and their comments taken into account.

Yours sincerely



Dr David Geddes
GMC 3253722
Director of Primary Care Commissioning

Attachment 1

NHS ENGLAND GOS CONTRACT COMPLIANCE - RECORD-KEEPING ASSESSMENT DOMAINS

When NHS England assesses records for compliance the following domains are assessed by a clinical advisor for each record

Reason for visit / symptoms
Ocular history
General health
Medications
Family ocular history
Unaided vision/vision with current spectacles
Visual acuity
Binocular vision assessment
External examination
Internal examination of the eye
C:D ratio
Any other (specific) comments from ophthalmoscopy
Refraction result
Visual fields (where relevant)
Tonometry (where relevant)
Advice given
Referral/notification letter copies
Full dispensing details (where a GOS voucher is used)
Record is legible
Is it easy to identify from the records which performer undertook the sight test?

Attachment 2

GOS CONTRACT - RECORD KEEPING REQUIREMENTS

PART 11 RECORDS, INFORMATION, NOTIFICATION, RIGHTS OF ENTRY AND SIGNATURES

Patient records

52. The Contractor shall ensure that a full, accurate and contemporaneous record, which may be in electronic form, is kept in respect of each patient to whom it supplies services under the Contract, giving appropriate details of sight testing.

53. The record required by clause 52 may be kept in electronic form

54. The Contractor shall keep that record for a period of at least 7 years.