

Q1. Is the content and structure of the draft revised Guidelines: Telehealth consultations with patients helpful, clear, relevant and workable?

The OHO's mission is to “**protect the health and safety of Queenslanders**” with the guiding principle for administering the *Health Ombudsman Act 2013* being “*that the health and safety of the public are paramount.*” The OHO considers that the content, and structure of the draft revised Guidelines: Telehealth consultations with patients, is helpful, clear, relevant, and workable and will assist the OHO with its mission.

The OHO supports steps to improve the communities access to safe, affordable, and appropriate healthcare services, particularly in Queensland where distance from healthcare providers may lead to poor health outcomes.

Q2. Is there anything missing that needs to be added to the draft revised guidelines?

The OHO has concerns about the provision of telehealth consultations to remote and indigenous communities where the provider may not be aware or consider the specific needs and circumstances of the patient and community. The OHO feels that the following areas need to be further clarified and reinforced in the proposed guidelines.

- 1) *Informed consent.* Prior to the provision of any telehealth services, the patient needs to provide informed consent, where the patient understands the alternatives to the telehealth consultation and decides to undertake the telehealth consultation for their ongoing care.
- 2) *Appropriate space* for the consumer to undertake telehealth consultations. Whilst the guidelines identify the space requirements for the health practitioner, they do not identify the requirements for the patient. Many patients within remote communities live in communal settings where they do not have access an area that is quiet and protects their privacy.
- 3) *Access to reliable technology* to undertake telehealth consultations (equipment, internet connectivity and bandwidth). Connectivity within the rural and remote areas is sporadic and limited. The health practitioner needs to ensure that the patient can access technology (including connectivity) that is suitable for the proposed telehealth consultation.
- 4) *Cultural considerations.* All telehealth consultations need be undertaken in a manner that takes into consideration the patients' values, customs, and beliefs. For indigenous communities this may include concerns about the use and storage of images (and their later use), if the consultation is being recorded, and the use of support people.
- 5) *Patient Privacy.* What systems does the health practitioner have in place to protect the patient's privacy, from access to the consultation (both live and recording) through to what happens to any images taken during the consultation.

The OHO believes that the health practitioner should be supported by the health service provider with policy, procedures, and guidelines to provide these services. The health service provider should undergo regular evaluation of these policy, procedures, and guidelines through an ongoing accreditation process.

Q3. Do you have any other comments on the draft revised guidelines?

The OHO supports the introduction of the section “Prescribing without having consulted with the patient” identifying where prescribing is not supported by the Medical Board. The OHO would like to recommend a further clarification that “prescribing should not occur where a therapeutic relationship has not previously existed with the healthcare provider” with the only exception to this being in an emergency. The OHO is aware of several situations where prescribing has occurred in isolation, outside of the normal patient / general practitioner relationship contributing to poor patient outcomes.

As identified in our response to question 2, the OHO also has concerns about the provision of telehealth consultations to remote and indigenous communities and can envisage this technology being widely promoted and used in this area to address skilled staff shortages as well as a cost saving initiative. The OHO believes that the availability of telehealth consultations should not be used as an excuse to withdraw “on the ground” community health services as part of cost saving measures and that patients should always have the option of an in person consultation.