

Raising Concerns & Governance Matters Relating to Primary Eyecare Services

October 26

Primary Eyecare

Raising Concerns & Governance Matters:

Concerns or issues relating to patients seen through a Primary Eyecare Services commissioned service must be raised directly with Primary Eyecare Services, so it can be managed through our existing clinical governance processes.

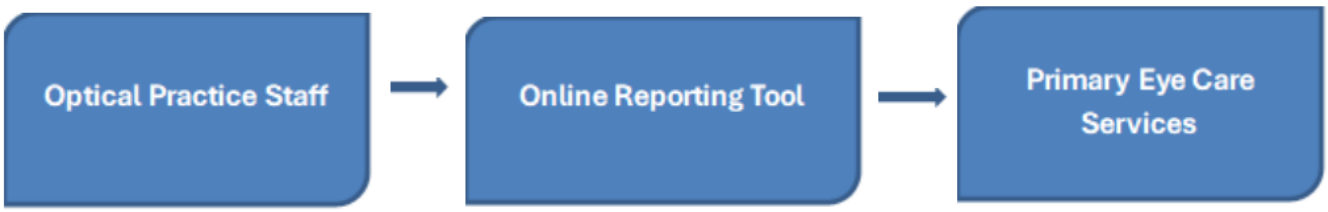
This process applies where a practice wishes to raise a concern about:

- A patient seen within a Primary Eyecare Services pathway;
- A referral query concerning a patient seen within a Primary Eyecare Services pathway;
- Another subcontractor practice; or
- An issue involving an NHS trust that falls within the scope of the service
- The best way to raise a concern is directly through the online reporting tool (blue bubble via OPERA) or by emailing hello@referral.support

You can also raise issues or concerns with your local Clinical Leads.

- Sana Asif (North East Essex) – sana.asif@primaryeyecare.co.uk
- Tom Mackley (Mid & South Essex) – tom.mackley@primaryeyecare.co.uk
- Pratik Patel (West Essex) – pratik.patel@primaryeyecare.co.uk

Use the OPR Reference when communicating with Primary Eyecare Services about a patient. This limits unnecessary sharing of Personal Identifiable Information (PII), while allowing Primary Eyecare Services to identify the clinical episode the issue or concern relates to.



The reporting methods above have been approved through our governance processes. Primary Eyecare Services does not accept or receive concerns through informal or unapproved channels, such as WhatsApp or other messaging services, as this may result in a data breach.

What happens next?

1. The concern is reviewed by Primary Eyecare Services.
2. Any outstanding patient safety risk is prioritised and managed.
3. We may contact you for further information.
4. An investigation will be undertaken by our Quality Team, in line with existing processes aligned to the NHS Patient Safety Incident Response Framework.
5. Outcomes and actions are managed appropriately with learnings implemented.
6. In some cases, an improvement plan may be put in place, with regular monitoring until completion.

All staff undertaking these processes within the Primary Eyecare Services' Quality Team receive specialist patient safety training aligned to their role and the requirements of the NHS standard contract, ensuring a consistent and evidence-based approach to quality improvement.

Local Optical Committee (LOC):

The LOC remains a valued partner in communication, professional engagement, education and shared learning. However, **as no lawful basis has been identified, the LOC should not receive patient-identifiable information elating to Primary Eyecare Services' service delivery**. Primary Eyecare Services reports to LOCs, while local clinical leads work collaboratively and maintain regular communication with LOC representatives.

Primary Eyecare Services Clinical Governance Responsibilities:

- As lead provider, Primary Eyecare Services is contractually responsible for:
- Investigating concerns, incidents and complaints about services.
- Assessing and managing patient safety risks.
- Identifying learning and opportunities for improvement.
- Implementing corrective action where needed.
- Reporting to commissioners where required.
- Managing service performance.

WhatsApp and Informal Discussions:

We recognise that practitioners and stakeholders use WhatsApp groups and informal professional networks. However, these are **not appropriate channels for reporting patient concerns, incidents, complaints or governance matters.**

Using WhatsApp or information discussions to raise concerns may mean:

- Important information does not reach the appropriate people.
- Patient confidentiality or data protection is put at risk.
- Issues are not properly documented.
- Primary Eyecare Services become unaware of concerns and cannot investigate or resolve them.
- Patient safety risks or necessary improvements are not identified, or identified late, leading to harm.

Data Protection Considerations:

For commissioned NHS services, Primary Eyecare Services processes patient information under UK GDPR Article 6(1)(e) (public task) and Article 9(2)(h) (the provision and management of health or social care). A separate lawful basis, defined purpose and clear accountability arrangements must be identified and documented before patient-identifiable information is shared with another organisation.

In particular:

- A request for information, or a history of receiving it, does not in itself provide a lawful basis for disclosure.
- If an LOC is not directly involved in care, incident investigation or commissioning oversight, there may be no clear lawful basis for sharing patient-identifiable information.
- Any organisation receiving identifiable patient information must have its own lawful basis, defined purpose and appropriate governance controls. These would normally include privacy information, information asset records, incident management arrangements, security and secure storage measures, and documented retention periods. The Data Security and Protection Toolkit provides a useful starting point but does not, by itself, demonstrate that all required safeguards are in place.

Sharing information without these requirements creates data protection risk for both the practice disclosing the information and the LOC receiving it.

Working Together:

Primary Eyecare Services values our partnership with LOC colleagues and remain committed to open, collaborative communication. Using clear governance routes helps concerns to be managed effectively, protects patient information and supports shared learning.

We would appreciate the Committee's support in promoting this principle:

Questions, complaints, incidents and governance concerns relating to Primary Eyecare Services' services, should be raised directly with Primary Eyecare Services, through the agreed governance channels rather than through WhatsApp or informal discussions.

Thank you for your continued support. Please contact us if you would like to discuss this further.