
Guidelines for Recorded Patient Consultations

For Training Practices and CME
(Continuing Medical Education Groups)

Revised by PGTC – September 2021





THE IRISH COLLEGE OF GENERAL PRACTITIONERS
UPDATED GUIDELINES
FOR
RECORDING OF PATIENT CONSULTATIONS
FOR TRAINING PRACTICES AND
CME (CONTINUING MEDICAL EDUCATION) GROUPS

Recording of consultations in this document refers to all modes of recording consultations including but not restricted to audio, video, electronic, digital camera recording of consultations.

Contents:

- 1. Important Notices**
- 2. Documentation**
- 3. Protocols in obtaining and recording patient consent.**
- 4. Security of recorded consultations on recording equipment and digital media.**
- 5. Role of Practice Secretary/Receptionist**
- 6. Role of GP Trainees & Using the ICGP Secure Media Transfer site**
- 7. Role of Trainer**
- 8. Role of Programme Directing Team**
- 9. Patient Information Leaflet**
- 10. Information for Practice Secretary/Receptionist**
- 11. Notice to Patients**
- 12. Consent Form**
- 13. Training Practice Protocol Form**
- 14. Practice Record Log of Recorded Consultations Form**
- 15. Acknowledgements**

Important:

- All recorded consultations must be accompanied by a valid consent form to be signed off by Trainer/Programme director prior to viewing the consultation.
- Only patients who are competent to consent can have their consultations recorded. Consultations with children require signed parental consent.
- Recording of consultations should be handled with the same level of security as patient record files.
- Phones, ipads, or any device that uploads to cloud storage should not be used to record patient consultations.
- For recorded telephone consultations, the attached standard consent sheet should be read out, and verbal consent should be recorded at the beginning and end of the consultation. In this situation the trainee should sign the consent stating that verbal consent is present in the recording.

Documentation

1. The Data Protection Officer/Trainer in each training practice will be required to maintain a log of patient recorded consultations which will be kept for the purpose of periodic audit (see Practice Record Log Form). This will include date of erasure of digital material and details of trainee responsible.
2. The ICGP patient consent form should be made available online for printing as a stand-alone form.
3. Individual patient consent forms to be scanned to patients file on completion of the consultation session.
4. The patient consent form must accompany any digital material to be used for teaching or examination purposes and to be counter signed by Trainer/Programme Director.

Protocols in obtaining and recording patient consent.

1. The role of the practice receptionist is to advise patients that the trainee is seeking to record some consultations in that clinical session. They should not be expected to have any role in obtaining patient consent. If the patient advises the practice secretary /receptionist that they do not wish to have their consultation recorded they must advise the trainee of this.
2. Individual trainees will take direct responsibility for obtaining patient consent both to initiate recording (signed before the consultation) and for its use for teaching purposes (signed after the consultation).

Informed consent means that the patient understands that:

- a. the recording may be held for a short period on file with the trainer
 - b. the recording will only be used for teaching doctors
 - c. The recording may be transported via a secure method for peer analysis but will auto destruct within 6 weeks
 - d. the patient can request the recording to be stopped at any stage during the consultation
 - e. the recording in the practice will be erased within 6 months of recording the consultation, unless written consent is obtained from the patient to extend the specified period.
3. Trainers/Programme Directors must view/counter sign consent form prior to its use for teaching or evaluation
 4. Individual patient consent forms to be scanned to patient's file on completion of the consultation session.
 5. Trainee on completion of the rotation to sign off the practice log of patient recorded consultations and maintain a copy in their own education file.
 6. Only patients who are competent to consent can have their consultations recorded. Consultations with children require signed parental consent.

Security of recorded consultations on recording equipment and digital media.

1. Recordings of consultations should be handled with the same level of security as patient record files.
2. Storage of Data must be in compliance with Data protection and Medical Council Guidelines. Data in transfer from the training practice to training scheme (day release) must be digitally encrypted.
3. Training Practice must accept that there is an inherent risk of breach of confidentiality once any patient consultation is recorded and strategically implement procedures to minimize risk of breach of confidentiality.
4. Training practices to have a secure location for storage of camera/recoding equipment at all times when not in use.
5. The Trainer is responsible for the security of the camera while in use in the training practice.
6. Recording equipment to be used only for the recording of consultations and not for the continued storage of recorded consultations.
7. The Trainer is responsible for erasure of recorded consultations and the recording of same both in patients file and practice log.

The role of the GP Trainee

1. Under no circumstances should there be any recording of intimate examinations or the camera be pointed towards the examination couch.
2. It is the professional responsibility of the GP trainee to obtain consent before and after the consultation.
3. Trainee must ensure that Individual patient consent forms are scanned to patient's file on completion of the consultation session.
4. The patient's consent, by the doctor, should be recorded during the consultation.
5. When a camera is not in use, it should either be removed or covered or alternatively point the lens towards the wall.
6. Trainee must ensure that the camera is used only for the recording of consultations and not for the continued storage of recorded consultations
7. Trainee must ensure that the recordings of consultations are handled with the same level of security as patient record files.
8. Trainee on completion of the rotation must sign off the practice log of patient recorded consultations and maintain a copy in their own education file.
9. Review of the recording for learning purposes is to be conducted in the face to face sessions using the ICGP secure media transfer

Using the ICGP Secure Media Transfer Site

The secure web based application to facilitate easy upload and streaming of patient consultations is accessed on www.icgpsecuretransfer.ie

The web application is hosted on a dedicated secure server with dedicated firewalls for an additional layer of security.

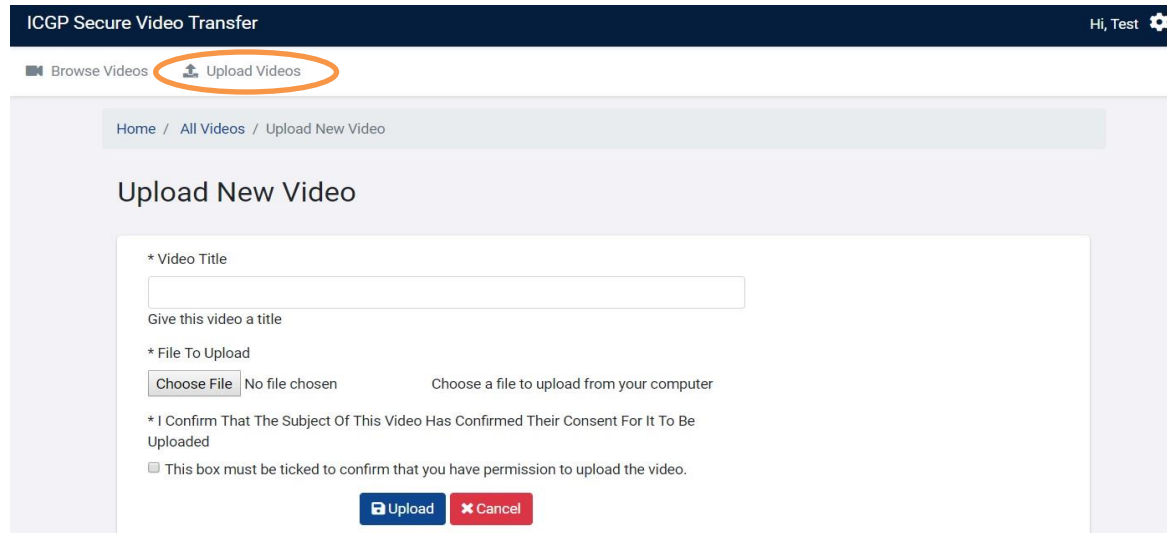
- As a trainee you can log in to www.icgpsecuretransfer.ie upload the recorded patient consultation media file to your own directory on the secure server via the web application.
- The user guidance below will assist you.
- **Please note video files are transcoded and encrypted prior to upload. Therefore it will take time to upload your video to the site.**
- Video files you upload are accessible to the educators of your training scheme.
- Your Trainer can review your video with you when you are logged into the website.
- Your video files are automatically deleted six weeks after upload.
- You must confirm patient consent before uploaded the video.
- **Please read the guidelines for recording of video consultations prior to recording video consultations.**

ICGP Secure Video Transfer – Trainee Access Guide

Step 1: Login to www.icgpsecuretransfer.ie using your *Username* and *Password*.

Step 2: Upload your video file

- Enter the desired name for your video file into the *Video Title* box
- Click *Choose File* to browse your PC or device for the video you wish to upload
- Please tick the box to confirm you have the needed permission to upload the video. When ready, click *Upload* or, if you wish to stop, click *Cancel*.



The screenshot shows the 'Upload New Video' interface. At the top, there is a dark blue header with 'ICGP Secure Video Transfer' on the left and 'Hi, Test' with a gear icon on the right. Below the header, there are two buttons: 'Browse Videos' and 'Upload Videos', with the latter circled in orange. The main content area has a breadcrumb trail: 'Home / All Videos / Upload New Video'. The title 'Upload New Video' is centered. The form contains the following fields and controls:

- * Video Title: A text input field with the placeholder 'Give this video a title'.
- * File To Upload: A 'Choose File' button, the text 'No file chosen', and the instruction 'Choose a file to upload from your computer'.
- * I Confirm That The Subject Of This Video Has Confirmed Their Consent For It To Be Uploaded: A checkbox with the text 'This box must be ticked to confirm that you have permission to upload the video.'
- At the bottom of the form are two buttons: a blue 'Upload' button and a red 'Cancel' button.

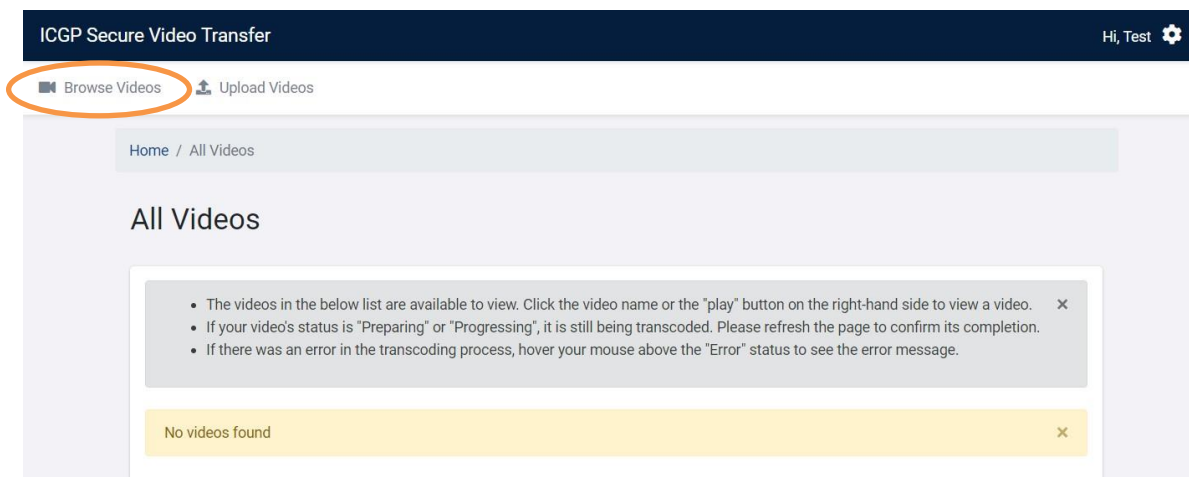
Once you click **Upload**, the upload process will begin, and you'll be notified via a screen overlay that the upload is in progress. Clicking anywhere (ideally blank) on the screen will clear the overlay without cancelling the uploading process.

The **file size limit** which can be uploaded is approximately 4GB, although please note that it can take a considerable amount of time to upload large files, and adds to transcoding and data transfer.

If you have a slow internet connection, you may find that your **session times out** before the upload completes on particularly large files – you'll be warned on screen shortly before this happens and advised to move the mouse to keep your session alive.

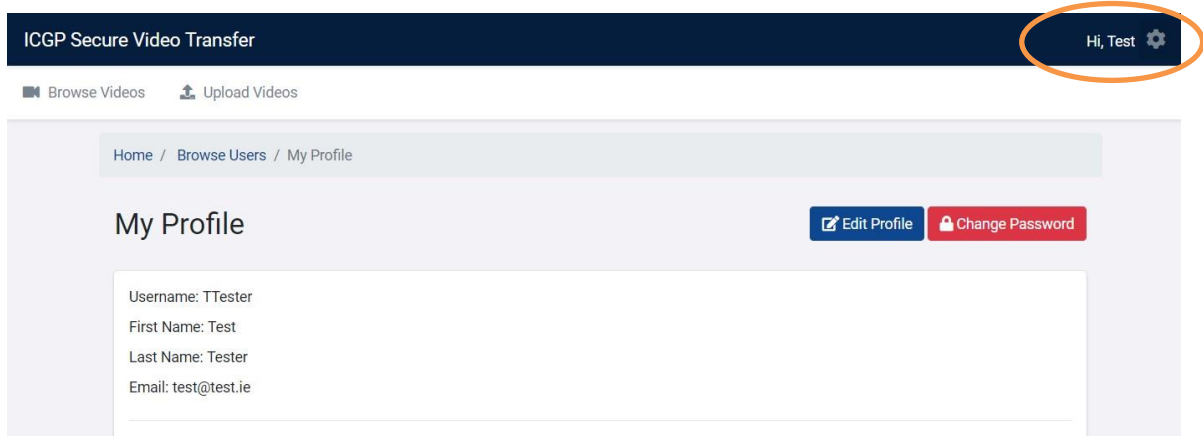
After upload, you will be taken to the Browse Videos screen where you can monitor the progress of the upload, using the refresh button to fetch the latest status as required.

Browse Videos Page



- On this page you will be able to view videos you have uploaded.

View and edit your profile



- To view your profile, click where you see your name in the top right hand corner
- On this screen you can view your details. If you wish to change anything, click edit profile. On this screen you can change your email and name.
- If you wish to change your password, click the change password option and you will be diverted to another screen.

Please note the following:

Phones, ipads, or any devise that uploads to cloud storage should not be used to record patient consultations.

It is the professional responsibility of the GP Registrar to obtain consent. This should be recorded during the consultation. The consent form should be scanned to the patient's file on completion of the consultation.

**Video recordings should not be taken or uploaded without prior signed consent by the Patient.
There should under no circumstances be any recording of intimate examinations.**

Videos uploaded to the secure media transfer site will automatically delete from the secure site after six weeks.

The Educators on your training scheme can review the uploaded video once submitted.

Your Trainer can review the video with you when you are logged in or can review the recording taken using the practice video recorder. Recording of consultations must be handled with the same level of security as patient record files. Recordings in the practice should be stored securely and deleted within 6 months.

The Guidelines on Patient Consultations and Consent form should be read prior to recording consultations.

A dedicated email address has been set up for any queries you may have please email securetransfer@icgp.ie

The Role of the Trainer

To ensure that the practice meets with all requirements as outlined in this protocol.

The Trainer is responsible for the security of the camera while in use in the training practice.

The Trainer is personally responsible for erasure of stored recorded consultations and the recording of same both in patients file and practice log.

It is the responsibility of the trainer to ensure the erasure of recordings of the consultations after 6 months or in line with any written consent extending the period of storage.

Prior to commencement of recording of consultations in the training practice, trainers must run an induction/ teaching session with the trainee on the recording of the consultations and responsibilities involved, including consent, storage and erasure and compliance with data regulations.

Practices must have data management guidelines in place, including systems to ensure compliance by the Trainees.

The erasure of recordings must be included in the appraisal documentation at the end of each rotation.

The Role of the Scheme Directing Team

The directing team has a responsibility to remind registrars at the end of each placement of their requirement to ensure consultations recorded by the registrars have been erased. Also to ensure that Trainees are not holding recorded materials beyond the consented time frames.

The scheme directing team should use the face to face protected time for review of and learning from recorded patient consultations, using the ICGP secure media platform.



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PATIENT INFORMATION LEAFLET

RECORDING OF CONSULTATIONS IN GENERAL PRACTICE

Dr..... is recording some of his/her consultations with patients today. This will be used to help teach doctors how to improve their consultation skills and their ability to talk to patients.

We should be grateful if you would help us by agreeing to your consultation being recorded.

- If you would prefer your consultation not to be recorded all you have to do is to say so. This will not affect your consultation or further treatment in any way.
- The recording equipment will immediately be switched off should you request this at any time.
- No intimate examination will be recorded.
- If you agree to the consultation being recorded you will be asked to sign a consent form, or for a telephone consultation, to allow your verbal consent to be recorded.
- The recording will be used by doctors only for the purposes of teaching, assessing or learning about consultation techniques in general practice, which will be for the long-term benefit of patient care.
- The recording is subject to the same degree of confidentiality and security as patients' medical records. The doctor conducting the consultation or his/her supervisor will be responsible for ensuring confidentiality in the future use of the recording and its erasure.
- The recorded file may be transported via a secure mechanism to the doctor's peer education site for analysis with other doctors in training. If this occurs the file will be erased within six weeks.
- No recording of a consultation will be stored beyond a period of 6 months unless you give further written consent.



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RECORDING OF CONSULTATIONS

INFORMATION FOR PRACTICE SECRETARY/RECEPTIONIST

This is for the purpose of learning and teaching about consultation in general practice, and to help doctors improve their consultation skills and their ability to talk to patients. For patients attending in person, the patients should be given an information sheet when they attend surgery. However, it is useful if receptionists booking patients in would inform the patients that their consultation may be recorded and that they might consider this, outlining the purpose, the voluntary nature and the consent requirements. Most patients are quite happy to help with this kind of activity, however, some will clearly feel uncomfortable at the thought of taking part and may have difficulty expressing this. It is very important that patients are not pressurised in any way to accept a recording of their consultation and they must be assured on this point.

Please note the following points:

- There recording is kept completely confidential and is only viewed by doctors.
- Aim for as normal a surgery as possible, whilst recognising that some patients will not want to be recorded.
- Patients who do not want to be recorded can be offered an appointment at another time or with another doctor, or can attend this session and be assured that the recording equipment will be switched off without this affecting their treatment in any way.
- Patients who agree at the time of making the appointment can change their minds when they later engage with their appointment.
- The secretary/receptionist has an important role in ensuring that patients have sufficient information to make a decision about being recorded without feeling unfairly pressurised.
- For patients who attend, upon arrival at the surgery, the patient should be given the information sheet about recording consultations to read. They should also be given a consent form to sign with the trainee.
- **Inform the trainee if the patient advises you they do not wish to have their consultation recorded.**

THANK YOU FOR YOUR HELP



NOTICE TO PATIENTS

REGARDING RECORDING OF CONSULTATIONS

This is a Training Practice attached to a Training Programme for General Practice. From time to time, we make recordings of consultations to help teach doctors how to improve their consultation skills and their ability to talk to patients.

Your consent will always be requested if a recording is being taken and the practice secretary will give you more information, including a consent form and information leaflet.

The recording will focus on the communication between the doctor and patient and will not record any intimate examinations.



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CONSENT TO RECORD CONSULTATIONS

We appreciate your permission to record your consultations with the doctor today.

- *The consultation may be seen/ heard by doctors who are in training, and their tutors, in a confidential setting. This is for teaching purposes*
- *No intimate examinations will be recorded*
- *You can request the recording to be switched off at any time during the consultation.*
- *You will be asked after the consultation if you want the recording erased.*
- *The recording will be securely protected by the recording doctor at all times.*
- *To facilitate assessment of the doctor on your consultation the encrypted media file may be uploaded to a secure web based site hosted through the ICGP.*
- *The recording will be erased by the recording doctor not later than six months from the date of recording.*

I agree to my consultation with my doctor today being recorded for educational purposes. The recorded consultation will be erased on or before, **date**.....

Patients Name (print) : _____

Signed before consultation: _____

Signed after consultation: _____

Date of recording: _____

Registrar signature & MCRN: _____

Trainer/PD Signature & MCRN _____

Date of erasure	Date scanned to patient file	Registrar signature



**TRAINING PRACTICE PROTOCOL FOR RECORDING OF PATIENT
CONSULTATIONS**

Training Practice Name:.....

Trainer:

Data protection officer

(if different from above)

Trainee:

Period of Training:

No.	Agreed protocol to be returned to Training Programme Prior to commencing Patient Recording	Trainer Initials	Trainee Initials
1.	Trainer and Trainee have together reviewed the current protocol		
2.	Notice in Waiting Room		
3.	Reception staff advised of day of consultation recording		
4.	Log book for all recorded consultations established in practice		
5	Consent forms available in Trainee consulting room		
6.	Individual patient form to be scanned to patient's file on completion of the session.		
7.	Logbook to be updated and to include date or erasure.		

This form to be returned to Training Programme Office prior to commencing consultation recording.



PRACTICE RECORD LOG OF RECORDED CONSULTATIONS

to be maintained by the data protection officer on site with copy to trainee file

Date of recording	Patient Initials and/or DOB	Trainee Responsible	Date of erasure

Acknowledgements:

Guidelines on recording of consultations were prepared by the National Association of Programme Directors and adopted by the Council of the College on Sunday 28th February 1996.

These guidelines together with recommendations from the South East Steering Committee have formed the basis for this revised document.

These guidelines were adopted by PGTC in May 2017, revised in 2019 and 2021.