

Our questions arise out of our concerns purely obtained from internet research. We asked if we could visit an existing user and were told no. Our concerns are: -

<p>A, The company is financed by the American investment company – Eight Roads backed by Fidelity. Both companies want profit.</p>	<p>DoctorLink were accepted onto the NHS DPS Framework by NHS-E after a due diligence process and this was repeated by the CCG prior to letting the contract with DoctorLink.</p> <p>Yes. Most contractors to the NHS seek to make a modest profit.</p>
<p>B, Doctorlink was only incorporated in 2016 and in 2018 had an income of only £3.3million. It has no track record.</p>	<p>DoctorLink were accepted onto the NHS DPS Framework by NHS-E after a due diligence process and this was repeated by the CCG prior to letting the contract with DoctorLink.</p> <p>Yes. As discussed at prior PPG meetings the purpose of the Dynamic Procurement System is to foster innovation and as such the lack of a lengthy track record is a likely outcome.</p>
<p>C, It has a worldwide staff of less than 200 employees. But we were told tonight it says it can service over a million customers.</p>	<p>DoctorLink were accepted onto the NHS DPS Framework by NHS-E after a due diligence process and this was repeated by the CCG prior to letting the contract with DoctorLink.</p> <p>Yes. As a DoctorLink are a digital supplier we don't find this surprising. They cover a 10M population base.</p>
<p>D, Internet responses from patients already using the system is over 90% dissatisfaction.</p>	<p>We have raised this with DoctorLink in April and asked them to: 1/ respond to each and every piece of feedback 2/ clarify on the comments where the issue may be arising due to how a surgery is using the system e.g. not offering appointments 3/ modify how they collect feedback</p>
<p>E, Comments on the internet from Doctorlink employees indicate it has a poor employee record.</p>	<p>DoctorLink were accepted onto the NHS DPS Framework by NHS-E after a due diligence process and this was repeated by the CCG prior to letting the contract with DoctorLink.</p> <p>Glass Door etc hold anonymous feedback from people claiming to have been employees of many companies.</p>
<p>F, Doctorlink's published Privacy Policy contains many statements that cause major concern.</p> <p>Doctorlink are aware of our questions and we have been awaiting a response for over 2 weeks. We are very disappointed at this tardiness to answer such important questions, which are:-</p>	<p>See Qs 1-3 below</p>

<p>1, Where is the data you capture stored? – Doctorlink web site is vague on this issue. It says that data is stored in Britain and in Europe.</p>	<p>We approached DoctorLink for a response on your behalf and received this from Suzanne Ash - Head of Governance on 30th April 2020:</p>
<p>2, What controls are in place to make sure patient data (name, NHS number etc) is kept secure?</p>	<p>“CCGs tender and award NHS contracts to members of the DPS Framework which acts as a ‘pre approval’ filter on their behalf. The DPS Framework conducts a due diligence process on all its applicants and conducts regular reviews to ensure membership remains valid.</p>
<p>3, Is patient data shared with external commercial organisations?</p>	<p>Assured in the knowledge that those suppliers have been subjected to thorough scrutiny and achieved all necessary requirements to comply with all relevant regulations and standards, commissioning organisations such as CCGs conduct an additional tender process and award contracts. In this particular contract, Doctorlink were the successful applicant.</p> <p>An element of both the DPS and CCG processes is to provide evidence of meeting and maintaining NHS requirements for the storage and processing of personal data and effective Information Security Systems, for example:</p> <ul style="list-style-type: none"> • Data Protection Security Toolkit • Cyber Essentials Plus • ISO 27001: Information Security Management Systems Certification <p>The Doctorlink Privacy Notice explains how we use any personal information we collect about patients when using Doctorlink products, as per the link below. Data is not used for marketing purposes and is processed and stored in accordance with the law.</p> <p>https://www.doctorlink.com/privacynotice/</p> <p>We review and update our Privacy Notice regularly and encourage customer feedback to inform this process. “</p>
<p>We are anxious to understand in more detail what patients – particularly the vulnerable- will be committing to when they use the system.</p>	<p>Please see the privacy notice.</p>

<p>Our concerns were increased from the very poor presentation this evening. The system is not at all patient friendly and it is now obvious why feedback from existing users is so negative. It was apparent key controls have not even been considered. We are concerned that GP's are legally data controllers and will be responsible for what happens to the data they collect from patients. We are unsure who will be responsible if this data is not kept secure by Doctorlink.</p>	<p>Under the terms of the NHS Standard Contract DoctorLink will be responsible if they don't keep the data secure.</p>
<p>We believe it would be very unwise for PPG's to endorse this system. Will they be liable in the event of a problem?</p>	<p>No.</p>