



# Irish Society of Chartered Physiotherapists

The Voice of Physiotherapy in Ireland

## POLICY and GUIDELINES on e-HEALTH for Physiotherapists in Private Practice

March 2020

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## **INTRODUCTION**

The Irish Society of Chartered Physiotherapists (ISCP) is the sole professional organisation for Chartered Physiotherapists in Ireland.

The ISCP welcomes the use of e-Health in physiotherapy where it enhances the service to the patient. It supports the expanded role of digital health as a method of healthcare delivery that may enhance patient-physiotherapist interaction, improve access to care and facilitate in the reduction of costs when used as a component of a patient's ongoing, regular care.

The European Commission's e-Health Action Plan 2012-2020 states that e-Health is to play a central part in facilitating "socio-economic inclusion and equality, quality of life and patient empowerment through greater transparency, access to services and information and the use of social media for health".<sup>1</sup>

E-Health should allow physiotherapists to focus:

*"On improving health"* - physiotherapists have a leading role in well-being and preventative programmes, by assisting the monitoring of health through mobile devices, tablet devices and through physical activity programmes that are monitored via digital technology.

*"On improving access to care"* whereby e-Health is putting health service users in a more efficient and effective health system whereby quality of care is enhanced. Via its cross-sectional approach e-Health has to encapsulate in it the physiotherapeutic aspect of care and also standardise it within its national and European frameworks.

### **1. POLICY STATEMENT**

It is the policy of the Irish Society of Chartered Physiotherapists that its members using e-Health follow this policy and these guidelines.

### **2. PURPOSE**

The Society has developed the Policy and Guidelines to outline best practice and statutory obligations for members who engage in e-Health.

This document is intended to assist members who engage in, or are considering, e-Health as part of the physiotherapy service they provide. The document outlines what needs to be considered when providing e-health.

### **3. SCOPE**

These guidelines apply to all members working in private practice who engage in e-Health. They are restricted to e-Health where it pertains to physiotherapist-patient engagement through telemedicine/video conferencing. The guidelines also pertain to the use of portable patient monitoring devices and sensor based technologies. The guidelines cover the management of data pertaining to the e-Health process – including sharing, recording and storing etc. The guidelines do not cover aspects other than the above mentioned.

#### **4. Legislation/other related policies**

Data Protection Act 2018

#### **5. GLOSSARY of Terms and Definitions**

*Chartered Physiotherapist* – a member of the Irish Society of Chartered Physiotherapists

#### **6. Benefits of e-Health physiotherapy**

- Convenience for patients in accessing professional health services including physiotherapy.
- Moves with the current trend towards digital healthcare and the need to address health concerns in a timely manner and location to accommodate present lifestyles.
- Easier access for rural populations who are isolated geographically.
- Can increase the number of contacts between patients and professionals.
- Tools and services can enhance content, quality and clarity, together with readability and therefore allowing the quality of care to be more efficient and effective.
- Reduces administrative load on the management system and is potentially less expensive and time consuming.
- Allows for the potential of electronic linking of test results to the correct patient within healthcare worker files which improves quality of care by reducing the potential for mismatching.
- Improves efficiency as questionnaires or forms can be completed before physiotherapy assessment.
- Interlinking systems provide easy to use data for quick and direct interaction with the patient.
- Allows remote consultations with patients for second opinions and with professional networks.
- Reduces environmental impact.

#### **7. Challenges of providing an e-Health physiotherapy**

Physiotherapists engaging in e-Health must be cognisant of the challenges involved in providing an e-Health service

- Implementing current regulation in a fast changing segment can be difficult.
- The absence of regulations and a regulatory organisation that keep up with the pace of technological advances.

- To avoid compromising the quality and established, evidence-based standards of physiotherapy care that prevail in the face-to-face service
- Whether a physical examination is required
- Whether a physiotherapist has access to the patient's medical records.
- Potentially not achieving the rapport and connection that a face-to-face consultation can achieve
- The potential for misinterpretation and/or miscommunication
- Additional safeguards must be put in place to ensure safety and accountability when it conducting online/video consultations.
- Appropriate training may be needed to use technology and interpret information correctly.
- Some patients may be resistant to sharing information digitally.
- Vigilance and additional cyber security measures are required to ensure security and privacy of patient data and to protect records from cyberattacks.

## **8. Policy**

1. The ISCP supports the expanded role of digital health as a method of healthcare delivery that may enhance patient-physiotherapist interaction, improve access to care and facilitate in the reduction of costs when used as a component of a patient's ongoing, regular care.
2. Physiotherapists in Ireland delivering e-Health services to patients must be registered with CORU.
3. Physiotherapists delivering e-Health services must ensure that they have adequate and sufficient professional indemnity cover in respect of the provision of this form of consultation. The ISCP insurance covers members to engage in e-Health services. If the insurance cover is not with the ISCP or the employer, the physiotherapist must ensure that the cover is at least comparable to that of the ISCP cover.
4. The provision of e-Health services must be held to the same standards of practise and regulation as are required of physiotherapists in the provision of face-to-face patient care. The ISCP policies and guidelines apply to e-Health services e.g. *Policy and Procedure on Concurrent Treatment by Two Physiotherapists*
5. Physiotherapists and physiotherapy practices must ensure that their provided digital health services are equitable and of a high quality. These services should be available to all patients, without disenfranchising financially disadvantaged populations or those with low literacy skills or low technological ability.
6. Physiotherapists must use their professional judgement about whether the use of e-Health is appropriate for a patient. If any physical examination is required or there is any other reason necessitating face-to-face consultation then telemedicine may not be an appropriate forum for providing clinical assessment or care. When establishing an e-Health service, it is advisable to consider exclusion criteria in relation to appropriateness. Some examples are included for consideration however this is not an exhaustive list; consider the risk of missing accurate

answers to red flag questioning in people who do not speak fluent English, those with hearing difficulties, those with learning difficulties and children. Also patients with acute trauma, progressive and deteriorating neurological conditions, or currently undergoing treatment for serious pathologies, including active Cancer. Consideration should also be given to treating children from a safeguarding perspective (See point 11 below).

7. Physiotherapists should take appropriate steps to establish a relationship based on the standard of care required for a face-to-face consultation. This will take the form of an appropriate client screening to include subjective history taking.
8. Physiotherapists and practices providing e-Health services must ensure that their patient communications and records are at all times secure and compliant with data protection legislation.
9. Patient data from tracker devices, online apps or any other digitally recorded patient metrics that are shared with the physiotherapist must be securely stored and accessed only by physiotherapist directly involved in the patient's care.
10. GDPR is applicable to e-Health services and the platform; the physiotherapist must seek explicit consent from patients for the processing of personal data; including the collection and storing of patient data from tracker devices, online apps or any other digitally recorded patient metrics. How this data will be used must be clearly explained to the patient.
11. To ensure child safe-guarding, when a patient is under 18 years of age, a parent must be present during e-Health consultations.

## 9. Resources

There is a Special Interest Group for Health and Social Care Professionals (H&SCPs) with an interest in e-Health. It is sponsored by the H&SCP's Office in the HSE –  
<https://www.hse.ie/eng/about/who/health-and-social-care-professionals/engaging-in-hscp-developments/>

There is no HSE document on e-Health.

## 10. Bibliography

### To be added

The European Commission's eHealth Action Plan 2012-2020

ISHA (2018) Policy and Position Statement relating to Telemedicine in General Practice/Primary Care, including Online/Video Consultations. Irish Student Health Association. Dublin; Ireland.

EPHA (2014) Health inequalities and e-Health - Report of the eHealth Stakeholder Group to DG Connect

Health and Social Care Northern Ireland - e-Health and Care Strategy FOR NORTHERN IRELAND – consultation document (not dated but after 2015)

e-Health HUB Smart. Find your way through the e-Health market - Guidelines to frequent legal and regulatory challenges of European eHealth SMEs

eStandards Roadmap for collaborative & sustainable standards development Recommendations for a globally competitive Europe Extended Summary April 2018

Heffernan J. et al (2015) Guidelines and Recommendations for Developing Interactive eHealth Apps for Complex Messaging in Health Promotion JMIR MHEALTH AND UHEALTH

ER-WCPT (2018) eHealth to Improve Patients Care and Physiotherapy Services Briefing Paper

D'Arcy E-M 2018 Future regulatory challenges in eHealth A Physiotherapy Perspective PowerPoint presentation to international conference of health regulators

## **11. Acknowledgements**

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## **12. Approval and Revision details**

Authors	Members of the Board subgroup (as above)	
Consulted	Chartered physiotherapists working in telemedicine CPPP Board Members working in private practice ISCP Proofing – Professional Advisor	
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