

CQC REGISTRATION ROADMAP

Online GP Practices

Remote primary care, ADHD assessment, lifestyle medicine, and digital health services

Supported by Cura Compliance UK

Overview

Registering an online GP practice with the Care Quality Commission (CQC) is a specialised process. Remote primary care services face different regulatory expectations than physical surgeries: there is no waiting room to inspect, but every clinical decision, identity check, and prescription must stand up to scrutiny. CQC expects a remote provider to demonstrate the same standards of safety, effectiveness, and good governance as a face-to-face service, achieved through documentation, technology, and tightly defined patient pathways.

Cura Compliance UK supports clients through every step, working in two clearly defined stages: Documentation and Submission (Stage 1) and Post-Submission Support Through to Success (Stage 2).

This roadmap sets out exactly what Cura Compliance UK will deliver, what we expect from our clients, and how the two sides work together as partners to achieve a successful registration for an online GP service.

Responsibility Key

Cura Compliance UK delivers	Cura Compliance UK
Client action required	Client
Joint client–Cura action	Both Parties

STAGE 1: DOCUMENTATION AND SUBMISSION

Building, gathering, and submitting your complete application

Task	Responsible
1.1 Statement of Purpose Client provides: clinical vision, mission, scope of services (e.g. online GP consultations, adult ADHD assessment and management, lifestyle medicine), service user groups, hours of operation, and any specialist interests. Cura Compliance UK develops and refines the Statement of Purpose to meet CQC expectations and ensure it correctly reflects the regulated activities, service type, and remote model of delivery.	Cura Compliance UK
1.2 Business Plan and Financial Viability	Cura Compliance UK

Client provides: Companies House registration details, website (if available), target patient demographic (e.g. adults 18+), services offered (GP consultations, ADHD, lifestyle medicine), pricing model, current savings, ongoing expenses, and projected revenue and profit for years 1–2. Cura Compliance UK develops the business plan and accompanying Statement of Financial Viability, including financial projections, company structure, and service delivery roadmap. Lender consent letters are included where premises are mortgaged.	
1.3 Service Type Selection For a fully remote online GP service the correct CQC service type is Remote Clinical Advice Service (RCA). CQC charges fees per service type and incorrect selection (e.g. DCS or DTS) is one of the most common reasons for rejection. Cura Compliance UK confirms the correct service type with CQC guidance, ensures it is applied consistently across all forms, and explains the implications to the client.	Cura Compliance UK
1.4 Regulated Activities We confirm which regulated activities apply. For most online GP services these are Treatment of Disease, Disorder or Injury (TDDI) and Diagnostic and Screening Procedures (DSP). Cura Compliance UK ensures regulated activities are correctly recorded against both the registered location and the Nominated Individual, a field that is frequently left blank and triggers rejection.	Cura Compliance UK
1.5 Clinical Policies and Procedures Fully tailored to remote primary care. Every policy is built from scratch for an online-only model rather than adapted from physical practice templates. The clinical policy set typically includes: • Medication Management Policy (including controlled drugs up to Schedule 2 and Home Office obligations where applicable) • Safeguarding Policy (adults; children where age range extends) • Consent Policy (with explicit 18-and-over restriction, identity verification, and data cessation) • Medical Emergency Policy (remote-specific protocols, e.g. routing to 999, geographic location capture) • Significant Event Policy • Infection Control Policy (relevant even in remote settings: equipment, staff illness, BCP linkage) • Patient Pathway	Cura Compliance UK
1.6 Operational and Governance Policies The operational policy set typically includes: • Good Governance Policy • Information Governance Policy (ICO registration, UK GDPR, Data Security and Protection Toolkit) • Records Management Policy (naming the chosen EPR, e.g. WriteUpp) • Complaints Policy (with PHSO escalation)	Cura Compliance UK

• Equality, Diversity and Human Rights Policy (referencing the current Accessible Information Standard) • Fit and Proper Person Policy • Staff Recruitment, Training and Development Policies • Whistleblowing and Freedom to Speak Up Policies • Health and Safety Risk Assessment • Business Continuity Plan (remote-specific: platform outage, single-point-of-failure mitigation) • Staffing Structure document	
1.7 Single-Person and Concentration Risk Many small online GP services begin with one clinician acting as both Registered Manager and Nominated Individual. CQC will scrutinise this concentration of responsibility. Cura Compliance UK builds explicit single-person risk mitigation into the Business Continuity Plan, Staffing Structure, and Good Governance Policy: documented cover arrangements, defined escalation routes, and clear succession plans.	Cura Compliance UK
1.8 Shared Documentation via Google Drive Client provides their email address. Cura Compliance UK creates a shared Google Drive folder and uploads each chapter of documentation as it is completed. Client reviews all documents and confirms that the content accurately reflects their intended way of delivering the service.	Both Parties
1.9 Application Forms Forms include: • New Provider Application • Registered Manager Form • Online Primary Care Provider Initial Questionnaire (specific to online GP services) Client provides: full name, address, DBS details, employment history, professional references, GMC number, indemnity details, and GP/health declarations. Cura Compliance UK completes all remaining sections, cross-checks the forms against the Statement of Purpose for consistency (town name spelling, postcode format, email addresses, signatures, service type, regulated activities), and guides the client through any required client-only fields.	Both Parties
1.10 Client Actions (Guided by Cura Compliance UK) The following actions can only be completed by the client. Cura Compliance UK provides full guidance, templates, and consultation throughout: • ICO (Information Commissioner's Office) registration and certificate • GMC registration confirmation for all clinicians (including the Registered Manager) • Medical indemnity insurance quotes and policy (e.g. MDU, MPS, MDDUS)	Client

• DBS (Enhanced) checks for all staff with access to patient data • Home Office Controlled Drugs Licence application, if Schedule 2 or 3 drugs are to be prescribed • Performers List inclusion (NHS England), if any NHS work is intended • EPR system contract and configuration (e.g. WriteUpp) • Video consultation platform contract and information governance review • Electronic Prescription Service (EPS) set-up • Registered office lease or proof of address • Mandatory training via the free NHS training portal (sufficient for registration; we guide on access) • Business bank account	
1.11 Final Review and Submission Cura Compliance UK conducts a final cross-document consistency pass: town names, postcodes, email addresses, dates within the 28-day submission window, signature dates, service type selection, regulated activities, ICO registration number inserted across all relevant documents, GMC numbers replacing any placeholders, and age band selections verified. Once the application is complete and internally consistent, Cura Compliance UK submits to CQC.	Cura Compliance UK

STAGE 2: POST-SUBMISSION SUPPORT*Follow-up, adjustments, and interview preparation until success*

Task	Responsible
2.1 Application Adjustments and Resubmissions Online GP applications attract close scrutiny, particularly around remote prescribing, identity verification, and controlled drugs. Cura Compliance UK expects requests for clarification and handles all required adjustments and resubmissions until the application is accepted by a Registration Inspector.	Cura Compliance UK
2.2 Ongoing Follow-Up with CQC We follow up with CQC on your behalf throughout the assessment process. If the Registration Inspector provides feedback or requests further information, we manage the drafting, evidence collection, and resubmission.	Cura Compliance UK
2.3 Mock Interviews We deliver mock interview sessions for both the Registered Manager and the Nominated Individual. For online GP services, mock interviews specifically rehearse: how clinicians verify patient identity remotely, how safeguarding concerns are escalated without a physical presence, controlled drugs governance, the boundary of services offered, single-person risk mitigation, and the technical robustness of the EPR and video platform. Mock interviews include detailed and candid feedback to prepare you for a successful CQC interview.	Cura Compliance UK
2.4 Fit and Proper Person Verification Support Cura Compliance UK supports the gathering and verification of Fit and Proper Person Test evidence under Regulation 5: GMC status, references, employment history, health declaration, and DBS. We ensure the evidence pack matches what CQC requests.	Cura Compliance UK
2.5 Follow-Up Until Success Stage 2 continues until your CQC registration is granted. We do not consider this stage complete until you are registered.	Cura Compliance UK

What Makes Online GP Registration Different

These are the issues we have seen trip up online GP applications most often. Cura Compliance UK addresses each of them as a matter of routine.

1. Service Type Must Be RCA, Not DCS or DTS

Service type is selected once and CQC charges fees per type. **Remote Clinical Advice Service (RCA)** is the correct selection for a fully remote online GP. Doctors Chamber Service (DCS) and Doctors Treatment Service (DTS) describe physical models. We have seen applications rejected and re-fee'd for this single error.

2. Controlled Drugs and Home Office Registration

If you intend to prescribe Schedule 2 or 3 controlled drugs (for example, methylphenidate or lisdexamfetamine in ADHD), a Home Office Controlled Drugs Licence is required. The Medication Management Policy is the single highest-risk document in an online GP application and must address: prescriber competence, monitoring frequency, shared-care arrangements, EPS routing, repeat prescribing limits, and the audit trail. We treat this policy as the headline document for CQC scrutiny.

3. Identity Verification of Remote Patients

Without a physical waiting room, patient identity must be verified by other means. Your Consent Policy and Patient Pathway must describe the documentary or biometric method used, how it is recorded, and what happens when verification fails. CQC will ask.

4. Single-Person Concentration of Roles

Where one clinician is both the Registered Manager and the Nominated Individual, CQC expects to see documented mitigation: cover arrangements, escalation, succession, and clear separation of operational and clinical accountability. Silence on this point reads as risk.

5. Age Range and Service User Bands

Most online GP services start with adults 18 and over. The age restriction must be stated explicitly in the Consent Policy and Statement of Purpose, and the service user age bands on the application forms must match. Extending later to under-18s requires a variation of registration and additional safeguarding evidence.

6. Information Governance for Remote Care

Online GP services hold and transmit sensitive personal data through the EPR, the video platform, and email. ICO registration is mandatory, the Data Security and Protection Toolkit is expected, and your

Records Management and Information Governance policies must name the specific systems in use (for example, the EPR product name) rather than referring to them generically.

7. Accessible Information Standard 2023/2024

The current Accessible Information Standard is the 2023/2024 version. Many template policies still reference the 2016 standard. Updating this is a small change with disproportionate value: it signals to CQC that the documentation has been written for the current regulatory environment.

8. The 28-Day Date Window

All dated documents in the submission must fall within the 28 days preceding submission. We refresh dates and signatures immediately before submission, not when the documents are first drafted.

9. Cross-Document Consistency

CQC reviewers cross-reference forms. Town name spelling, postcode format, email addresses, GMC numbers, ICO numbers, signatures, regulated activities, and service type must agree across every document. A single inconsistent field can stall the application. Our final consistency pass is the last action before submission.

Payment Structure

Stage 1 payment is agreed at the start of the engagement and covers all documentation, form completion, and submission work.

Stage 2 payment is taken close to the interview date. If the interview is unsuccessful, the Stage 2 fee is refunded. This is our guaranteed-success formula: you only pay for Stage 2 when the outcome is positive.

Ongoing Support and Communication

- Access to our business WhatsApp for quick queries and updates
- Two dedicated consultants available throughout the process
- Office consultation meetings arranged as needed
- Guidelines, mentoring sessions, and advisory consultations

Additional Services for Online GP Practices

Website Development: we offer a separate website development service with a dedicated developer. For online GP services, the website is part of the patient pathway and CQC may consider its content and accessibility during assessment. Please speak with us for details.

Technology Selection Advisory: we can advise on EPR systems (e.g. WriteUpp), video consultation platforms, and electronic prescribing set-up where the choice affects regulatory positioning.

Our Partnership Approach

This process is built on partnership and collaboration. We commit to delivering expert guidance, thorough documentation, and hands-on support at every stage. In return, we expect our clients to:

- Follow our recommendations and guidance throughout the process
- Review all shared documents and provide timely feedback
- Complete the client actions outlined above within agreed timeframes
- Communicate openly if any plans or circumstances change

We encourage initiative, but please note that Cura Compliance UK cannot take responsibility for actions taken without our guidance. Our success depends on working together towards a shared goal.

Cura Compliance UK | *Your Partner in CQC Registration for Online Healthcare*