



Policy for recorded patient consultations

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1.0 Purpose

To set out the principles, governance requirements and responsibilities relating to the recording of patient consultations for GP training purposes.

2.0 Scope

This policy applies to GP trainees, GP trainers, Scheme Directing Teams (SDTs), patients participating in recorded consultations and training practices involved in GP training.

3.0 Policy Statement

Recorded consultation analysis is an established component of GP training and supports reflective learning, assessment and consultation skills development. Recorded consultations must be conducted and managed in a manner that protects patient privacy, preserves confidentiality and complies with applicable legislation.

Scheme directing teams are responsible for delivering or facilitating educational sessions on communication and consultation skills. The principles and learning arising from these sessions should inform trainee practice in the selection, recording and review of patient consultations.

Recordings are reviewed for assessment and teaching purposes, including reflective learning, assessment and professional development of a GP trainee, and other GP trainees within the same year group.

Patients have the right to receive clear information about the purpose of the recording and how the recording will be used. They are entitled to receive information regarding how the recording will be stored, accessed, retained and deleted, and to ask questions and receive sufficient information to make an informed decision. Patients may give or refuse consent without any impact on their care or treatment and may withdraw consent at any time. Patients may request that a recording be paused or stopped completely during the consultation and may request deletion of the recording where consent has been withdrawn and the recording has not yet been used for its intended educational purpose. Patients are also entitled to exercise their rights under applicable data protection legislation.

3.1 Data Protection and Legislative Compliance

The Irish College of GPs respects the right to privacy and the protection of personal data.

As a data controller, the Irish College of GPs is responsible for determining what personal data will be used, how and why in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

The patient's and the trainee's rights as data subjects are provided under the GDPR and the Data Protection Act 2018.



Full privacy policy available on the college website:

<https://www.irishcollegeofgps.ie/Privacy-Policy>

3.2 Principles

The following principles apply to the recording, storage, review and use of recorded patient consultations. Patients' privacy, dignity and autonomy must be respected at all times. Patients must receive sufficient information regarding the purpose of the recording through the Patient Information Leaflet and appropriate legal authority and consent must be obtained before any recording takes place. Participation must be voluntary and patients must not be pressured to participate.

No personally identifiable patient information shall be included in feedback reports, consultation analyses, discussion notes, GPEP entries, reflective learning records or any associated educational documentation. All patient information used for training or assessment purposes must be anonymised.

3.3 Consent

Consent must be informed, voluntary, explicit and provided by a person with the capacity to consent. Only competent adults may provide consent on their own behalf. Consultations involving children require consent from a parent or legal guardian. Consent must be obtained before any recording takes place. As part of the consent process, patients must be informed that they are consenting both to the recording of the consultation and to the use of that recording for approved educational purposes, including reflective learning, assessment and the professional development of GP trainees, in accordance with this policy.

Patients may withdraw consent at any time. Where consent is withdrawn, recording must cease and the recording must be deleted immediately. Patients may also request deletion of the recording following the consultation. Recordings must be stored securely in accordance with College procedures, used only for approved educational purposes, and must not be disclosed outside the scope for which consent was obtained.

3.4 Physical examinations and intimate examinations

Intimate examinations must never be recorded. The camera must not be pointed towards the examination couch at any time for any examination.

3.5 Deceased patients

Confidentiality is essential to safeguard a patient's dignity, privacy and autonomy and extends after death.

3.6 Telephone consultations

Telephone consultations are not suitable for recorded consultation review and must not be recorded or submitted.

3.7 Recording and storing consultations

Direct capture to the Panopto platform is the College's recognised standard method for recording and uploading patient consultations. Videos recorded prior to upload must be uploaded to Panopto immediately. Copies must not be retained or stored locally. Videos uploaded to Panopto will be automatically deleted after 90 days and they may be manually deleted before this time if consent is withdrawn.

Further guidance on recording, uploading, naming and sharing videos is available in the [Panopto User Guides](#).

4.0 Roles and Responsibilities

4.1 GP Trainees

GP trainees are responsible for obtaining valid informed consent in accordance with this policy and associated procedures and for complying with all applicable data protection and confidentiality requirements. They are responsible for uploading recordings to approved College systems, including Panopto, in accordance with College procedures and for ensuring the secure handling, storage and deletion of recordings as required by this policy. GP trainees must ensure that signed consent is stored in the patient file and that no personally identifiable patient information is included in feedback, consultation analyses, discussion notes, reflective learning records or any associated educational documentation.

4.2 GP Trainers

GP Trainers are responsible for supporting compliance with this policy and associated procedures. Before consultation recordings are undertaken within the training practice, GP Trainers shall ensure that trainees have reviewed and understood this policy, the associated user guides, and their responsibilities regarding consent, data protection, storage, retention and deletion requirements. GP Trainers are responsible for ensuring that the practice has appropriate data management procedures in place to support compliance with this policy and that signed consent has been obtained and retained in the patient record. GP Trainers must also ensure that no personally identifiable patient information is included in feedback, consultation analyses, discussion notes, reflective learning records, or any associated educational documentation.

4.3 Scheme Directing Teams

Scheme Directing Teams are responsible for delivering or facilitating educational sessions on communication and consultation skills and for reviewing and promoting awareness of this policy, associated procedures and supporting guidance documents. They shall ensure that trainees and trainers have access to relevant policies, procedures, guidance documents and training materials.

Scheme Directing Teams are also responsible for using face-to-face protected teaching time to facilitate the review of, and learning from, recorded patient consultations through the Panopto platform, including supporting trainees in applying the principles and learning arising from communication and consultation skills teaching.



In addition, Scheme Directing Teams must ensure that no personally identifiable patient information is included in feedback, consultation analyses, discussion notes, reflective learning records or any associated educational documentation.

5.0 Definitions

Recorded consultation	A video recording of a consultation between a GP trainee and a patient that is used for approved educational purposes, including reflective learning, assessment and professional development of GP trainees, in accordance with this policy.
GDPR	The General Data Protection Regulation (GDPR) sets out detailed requirements for companies and organisations on collecting, storing and managing personal data. It applies both to European organisations that process personal data of individuals in the EU, and to organisations outside the EU that target people living in the EU.
Explicit consent	Explicit consent is a clear, unambiguous, and voluntary agreement by an individual to allow the processing or use of their personal data or information.
Anonymised Data	Data from which all personal identifiers have been removed or modified so that the individual cannot be identified directly or indirectly. Anonymised data cannot reasonably be linked back to a specific person.

6.0 Related Documentation

- ICGP Privacy Policy
- Panopto User Guides
- Patient Information Leaflet
- Patient Consent Form
- Procedure for recorded patient consultations