# Developing NHS Online

## Consultation briefing for Local Healthwatch organisations

15 December 2025

Note on terminology: The Department of Health and Social Care (DHSC) and NHS England are working to establish a new online service which will deliver online elective services as part of the NHS. This is referred to in this consultation document as the **Online NHS Trust**.

**Introduction**

The Department of Health and Social Care (DHSC) and NHS England are working to establish a new online service – NHS Online - which will deliver online elective care as part of the NHS. When the establishment of any NHS Trust is being considered, there is a duty on the Secretary of State for Health and Social Care to first consult with the relevant local Healthwatch.

The new Online NHS Trust will deliver a range of end-to-end specialist planned care services digitally and will be a choice for all NHS patients on certain pathways and who are signed up to the NHS App across the country.

GPs will be able to refer patients on these pathways to the Online NHS Trust to receive their care virtually, in the same way a GP may refer a patient to an existing trust to have it managed in person, freeing up capacity for face-to-face appointments in trusts. We will work with clinical staff and their union representatives on how best to deliver this model of care but expect that the Online NHS Trust will require only a small proportion of the overall NHS clinical workforce to commit a small amount of additional time. Clinicians will be able to work flexibly so as not to impact on their substantive NHS employment.

The 10 Year Health Plan sets out the government's ambition to increase the availability of virtual services for NHS patients. The Plan stated that "by 2035, most outpatient care will happen outside of hospitals in the community", enabled through greater use of digital tools, to ensure patients continue to have a choice over where and how they receive care. The new NHS Online Trust is a bold new concept to deliver on this ambition.

The NHS Online Trust will provide coordination of end-to-end elective care services in clinically appropriate specialties and pathways - from referral and clinical triage to initial consultation and treatment - and integrate where necessary with in-person services delivered by other trusts across the country. The digital-first entity will deliver patient care across the country, unconstrained by geographical boundaries, and help to align clinical capacity with patient demand. The existing workforce will be supported to offer small amounts of additional capacity at a time and place that suits them, taking full advantage of more flexible working arrangements, latest technologies and innovations to deliver more standardised and timely patient care.

As the Online NHS Trust will operate nationally, the Secretary of State is seeking the views of all local Healthwatch organisations. Healthwatch England and NHS England are supporting DHSC in this consultation.

Healthwatch England are facilitating a webinar to support this consultation. We encourage you to attend – and details will be circulated shortly. We also ask each local Healthwatch organisation to submit individual responses. Please send to the Secretary of State at OnlineNHSTrust@dhsc.gov.uk by Monday 9 March 2026. The themes and points you raise will help to inform the policy programme and will be worked through as we continue our policy development to ensure any new trust has the appropriate design and functions when it begins taking on patients from 2027.

You are also free to copy your response to Healthwatch England if you wish, by emailing [policy@healthwatch.co.uk](mailto:policy@healthwatch.co.uk)

## Explaining the Online NHS Trust

### Introduction
On 30 September 2025, the Prime Minister announced the intention to establish the first ever national digital-first elective NHS online service to transform how the NHS delivers care and make a real impact on waiting times.

There is a compelling case for change in relation to delivery of elective virtual care services at a national scale:
- over 6 million patients are waiting for elective care in England
- people increasingly expect a digital-first approach to care in line with other aspects of their lives
- digital care provides these patients with improved access, more choice and more control over their own care

There is an opportunity to offer patients a new model of elective care (supplementing existing models), using the latest in healthcare technology and innovation to reduce long waits and to make accessing high quality care more convenient.

### How will the Online NHS Trust work?
Consistent with the shift from analogue to digital as set out in the 10 Year Health Plan, the Online NHS Trust will not deliver clinical services from a physical location.  Instead, it will connect patients with clinicians across the country through secure, online appointments accessed through the NHS App. This short video introduces the concept (which we are now calling the Online NHS Trust) and how it is intended to work in practice.

This national digital trust will build on tried and tested online healthcare already being delivered around the country, making these benefits available to patients wherever they live.

Patient care pathways will be delivered remotely via the NHS App, with NHS clinicians providing timely, quality and safe care through flexible working arrangements.  These clinicians will have the choice to offer their time in a way that works best for them and for their patients.

Patients will have the choice to be referred to the Online NHS Trust. If they opt in, their care will be managed through the NHS App – including the ability to see specialists online, receive prescriptions, arrange scans and tests and get advice on managing their condition.  Information on appointments, test results and their condition will be available via the NHS App.

Where physical tests or procedures are needed, patients will be able to access existing services like community diagnostic centres and surgical hubs that are local to them.

The new digital trust will be regulated to the same high standards as all other NHS trusts, including by the Care Quality Commission, but will operate differently as it will be covering a national footprint to align patient need with clinical capacity.

Patient choice remains central. In-person care will always be there for those who prefer it, for those whose care needs require it, or those who cannot use, or face barriers to using, the NHS App.

**When will the Online NHS Trust begin seeing patients?**
It is expected the new trust will launch across a small number of pathways where there are proven models of virtual care delivery. Over time this will be expanded to more treatment areas, and only offered if the NHS knows it is it is clinically safe to do so remotely.

Subject to approval from the Secretary of State for Health and Social Care, the expectation is for the new NHS trust to be established on 1 June 2026. A period of testing the service with patients will begin in January 2027 before launching later in 2027.

**Explaining NHS Online - consultation questions**

The vision is to establish the first digital NHS trust to offer patients a new choice of provider to meet their elective care needs.

We invite insights from all local Healthwatch organisations to inform design and help DHSC and NHS England communicate the Online NHS Trust to the public. We are particularly interested to know:

1. **What insight(s) can you share on people's use of digital health services, such as signing up to and using the NHS App, using online referral tracking tools, booking appointments online or giving feedback virtually, in your local area?**
2. **What has worked well to upskill people on understanding, signing up to and accessing digital health services?**

**Patient choice and the Online NHS Trust - consultation questions**

We would like to know more about how patient choice should work in the Online NHS Trust.

Patients will always exercise choice about whether to be referred to the Online NHS Trust. They will only be referred to have their care provided by the Trust if their clinician deems it appropriate, and they agree. Patients who prefer face-to-face appointments in physical settings will continue to access care through their local NHS provider. This is about expanding choice, not replacing traditional services.

3. **How can we help patients understand how the Online NHS Trust will work in practice, especially when:**
   **a. choosing to be referred to NHS Online through a primary care appointment**

b. arranging consultations and diagnostics through the NHS App

c. the stages of treatment along standardised pathways

4. **What communication is needed to help patients and clinicians understand their new choice?**

## Online NHS Trust - benefits and opportunities
### Benefits for patients and carers

The Online NHS Trust will offer a range of benefits and opportunities for patients and carers:

- Over the first three years of being operational, the Online NHS Trust will deliver the equivalent of 8.5 million appointments and assessments, helping patients and carers to get earlier access to the care they need.
- Patients will have the ability to access specialists beyond their local area, meaning shorter waits for care.
- Patients will be better informed on where they are in their care journey through the NHS App, with a contact route for people to use if they have any problems or uncertainties.
- Care will be available at a time and place that works for patients and carers - from work or from home and during evenings or weekends. When a patient needs physical tests or procedures, patients will be able to easily arrange them via the NHS App, in locations that are near to where they work or live.
- Virtual care will help reduce unnecessary travel to appointments, which can help save patients time and money and is better for the environment.
- A reduction in care variation will be achieved through standardised pathways and national coverage, allowing people in all parts of the country to access the most appropriate care available.

### Benefits for the workforce

- The Online NHS Trust will allow NHS clinicians to consider offering their time caring for patients in a way that is convenient and attractive for them without impacting their substantive NHS employment with existing providers.
- The Online NHS Trust will require only a small proportion of the overall NHS clinical workforce to commit a small amount of additional time, whenever convenient. Clinicians can expect to spend their time undertaking activities such as remotely triaging patients, responding to advice and guidance requests and conducting remote consultations.
- By being able to offer additional working hours through NHS Online, clinicians will have a way to increase their earnings in line with NHS values.
- By reducing the administrative burden and cutting paperwork through smart technology, clinicians will be able to focus their time and expertise where it matters most - with patients, improving their job satisfaction.

### Benefits for the NHS

- The Online NHS Trust operating nationally allows for the NHS to leverage its resources more effectively, freeing up local resources for those needing or preferring traditional models of care including for those with complex needs.

- Online care is a cost-effective technology-enabled delivery model with lower overhead costs compared to physical providers - primarily because there will not be a clinical site and back-office functions, such as finance and HR.
- The new model offers a significant opportunity to work with partners to implement transformation at scale to benefit patients, workforce and taxpayers.

**Benefits and opportunities - consultation question**

There are many identified benefits and opportunities associated with the Online NHS Trust.

5. **From your knowledge of local patient experiences, what do you see as the main benefits of the Online NHS Trust for patients in your local area? In your response, please identify where these benefits may differ for different cohorts (for example, considering characteristics, geography, digital literacy).**

## Online NHS Trust – risks and concerns

Early exploration supported by engagement with partners, including Healthwatch England, has identified possible risks of introducing the Online NHS Trust. This section identifies the themes and proposed mitigations ahead of further feedback received from this consultation.

### Theme – health inequalities

It is expected the Online NHS Trust will increase patient choice and improve access for some patients, including those in marginalised groups who may benefit from accessing care virtually or from accessing in-person care freed up locally because of other patients choosing the virtual option. Whilst digital services work well for some, they do not work for everyone so patients will be offered a choice of the most suitable options for them.

The Online NHS Trust programme is committed to addressing the impacts of the programme on health inequalities as far as is possible. The new trust will prioritise inclusion, and the processes that underpin it, including continual creation and updating of relevant equality health impact assessments as the organisation evolves.

The Online NHS Trust will be compliant with the Accessibility Information Standard and will investigate improvements that can be made beyond these standards where particularly relevant to the pathways in question – for instance, eye care needs to over-index on potential visual impairment. Health inequality considerations will also be incorporated into any technical requirements developed to procure technology that will be integrated with the trust's technology platform.

Patient support services are being explored, ensuring those who choose to access care in this way are well supported throughout their care pathway. For example, the programme will consider where patients can be supported in the community to access care digitally, such as at local libraries. For patients whose first language is not English, we will explore interpretation services and access to a national workforce pool. This could enable us to pair doctors who speak multiple languages with  patients who speak those languages.

We acknowledge that virtual care may not be appropriate for every patient. Maintaining existing non-digital means of accessing health services is important to avoid discriminating against those who cannot or choose not to use digital health and care services. Communications to referrers and patients will make clear that referral to a virtual pathway in the new Trust will always be the patient's choice.

The new trust will alleviate some of the pressures on elective care through providing additional capacity, freeing up more of the traditional route for those who do not choose or are not suitable for referral to the Online NHS Trust.

### Theme: suitability of pathways

- It is recognised that some elective care may not be well suited to virtual delivery - for example, where physical examination is required, or where geography is important to allow integration with local services (for example, managing complex co-morbidities).

- Initially the focus will be on a small number of planned treatment areas with the longest waits - gastroenterology, urology, gynaecology and ophthalmology. Over time this will be expanded to more treatment areas. Treatment areas will only be offered if the NHS knows it is it is clinically safe to do so remotely.

- Pathways have been selected where there are proven models of virtual care delivery and there is an opportunity to make a significant impact on waiting times. The Online NHS Trust can, in time, deliver care across all pathways that are appropriate for virtual care.

- Pathway selection and onboarding to the Online NHS Trust will always be based on clinical safety.

## Theme: continuity of care

- It is intended that once referred, the patient's entire journey will be the responsibility of the Online NHS Trust which will manage all interactions between the patient and clinicians including at consultation, and in further steps through the pathway including diagnostic tests at a local centre.

- The new entity will be fully integrated into current NHS infrastructure and able to leverage the services of existing providers to ensure patients can access diagnostic tests when they need them.

- Once a patient is referred to the Online NHS Trust, their journey will be tracked, capturing relevant notes and decisions across their entire pathway, supporting high quality and high value interactions with clinicians at every point.

- Tracking patients in this way will enable the ability to measure outcomes and intervals between activity and will help prevent any patient from being missed. As well as using technology to track patient journeys, patients will easily be able to contact the Trust as and when needed for support with their care and/or the technology.

- Administrative improvements will ensure good note sharing as standard which will support continuity of care within the service, regardless of whether the patient sees the same professional throughout their care pathway.  As this will always be a choice, where it is preferred, people will have the option of traditional routes to see the same professional.

## Theme: regulation

- The new Trust will be subject to the same regulatory framework as other NHS providers. Clinical governance arrangements will be put in place designed specifically to manage virtual clinical services safely and effectively. The Trust will have the full suite of clinical risk management tools available to it and clear accountability at board and medical director level, supplemented by robust technology designed to ensure the highest levels of clinical risk management.
- As patient safety is paramount, all doctors working for the Online NHS Trust will be registered with the GMC and working to the same clinical standards as doctors in

local hospitals. The Trust will be regulated in the same way as other NHS trusts, by organisations including the CQC.

- Patient data will be protected as it is in any other NHS setting.
- As a regulated provider of NHS services, the Online NHS Trust will also be required to have a complaints procedure, adhering to the 2009 NHS Complaints regulations.

## Risks and concerns – consultation question

Engagement with partners has identified possible risks and concerns to mitigate through the design and operation of the Online NHS Trust.

6. **What are the key areas of concerns for local Healthwatch organisations about the offer of elective care through the Online NHS Trust and how should they be mitigated?**

## Patient experience and feedback

The Online NHS Trust will undertake evaluations to assess the actual benefits realised compared to expected benefits. These evaluations will be used to identify lessons learned and, where appropriate, inform updates to the implementation plan.

**Patient experience and feedback – consultation questions**

7. **How can we work with you and the public to design the Online NHS Trust?**
8. **How should DHSC evaluate whether the policy is a success for patients?**
9. **What should the new Online NHS Trust learn about processes for capturing and responding to patient complaints?**
10. **How should the Online NHS Trust ensure people's experiences are captured and used for service improvement?**

## Online NHS Trust – final question

11. **Do you have any wider comments that you would like to share?**

**Annex 1 – full list of consultation questions**

**Explaining NHS Online**

1. what insight(s) can you share on people's use of digital health services, such as signing up to and using the NHS App, using online referral tracking tools, booking appointments online or giving feedback virtually, in your local area?
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**Patient choice**

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4. What communication is needed to help patients and clinicians understand their new choice?

**Benefits and opportunities**

5. From your knowledge of local patient experiences, what do you see as the main benefits of the Online NHS Trust for patients in your local area? In your response, please identify where these benefits may differ for different cohorts (for example, considering characteristics, geography, digital literacy).

**Risks and concerns**

6. What are the key areas of concerns for local Healthwatch organisations about the offer of elective care through the Online NHS Trust and how should they be mitigated?

**Patient experience and feedback**

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**Final question**

11. Do you have any wider comments that you would like to share?