

## ECOO Guidance

# Good online practices for consumers and patients

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### Introduction

With increasing offers of online optical and optometric services, consumers and patients have an increasing range of choices to seek eye health advice or to purchase their spectacles, contact lenses or visual aids. Prices and offers can be easily compared and trying on glasses by means of web-cameras or pictures allows for increasingly better support mechanisms to make choices.

While this can be convenient, consumers and patients should be aware that spectacles and contact lenses are medical devices and require more careful consideration than other non-health related consumer goods. Optical devices such as spectacles, contact lenses and low vision aids have a direct effect on the daily lives (such as working, driving, independent living) as well as on the long-term health of consumers and patients. This is why regular professional eye examinations and professional advice on appropriate optical choices and fitting are especially important.

Many consumers and patients however are unaware of the importance of seeking professional advice and lack the information they may need to make informed choices.

This document offers guidance to consumers and patients who wish to make use of online optometric and optical services with the aim of promoting safe, informed consumer and patient online behaviour.

### Disclaimer

This document is a non-binding guidance to promote well-informed and responsible consumer/patient behaviour when making use of online optical or optometric services including the purchase of optical devices such as spectacle and contact lenses online. It aims to raise awareness about the particular features of purchasing these medical devices online and to make consumers/patients aware of what to consider when engaging in online purchases of this nature. The guidance is non-exhaustive and highlights some issues which ECOO has identified as the basis for safe and responsible consumer/patient practice in this area. ECOO is not liable for the behaviour or practices of any professional, provider or consumer/patient. The terms “consumer” and “patient” are used to reflect the fact that optical and optometric services can fall under the healthcare or handicraft sector in different countries.

## **Key principles for consumers/patients to consider and be aware of when making use of online optical and optometric services:**

### *Awareness about consumer rights:*

- Consumers/patients should be aware of their rights when accessing professional services or purchasing spectacles, contact lenses or low vision aids online.
- Rules governing online services differ between countries and are likely to change in the coming years as the European Union is working on rules to harmonise the digital single market. This will for instance include rules covering what to do in the case of faulty products and returns policies.
- Websites should also make consumers/patients aware of the competent authority governing online healthcare/handicraft services in the website's host country and any complaints procedures.

### *Data privacy and confidentiality*

- In May 2018, new EU regulations on data protection come into force which will mean that the same rules apply across all EU member states. To note however, national legislation may vary on how healthcare patient data has to be handled.
- The privacy of consumer/patient personal data needs to be maintained at all times by online providers.
- Consumers/patients have the right to know what personal data is collected, how it is stored and for how long, for what purposes it is used and that it will be kept securely.
- Data must not be shared without the consent of the consumer/patient and information on how to access or delete the information needs to be readily available. In some countries the healthcare data is stored by law in a central database, in which case the social security number of the patient/customer may be needed for the eye care professional to deliver the service.

### *Use of reliable websites or apps*

- Consumers/patients should be careful about the websites or apps they use. They should check that the services they receive are offered by appropriately qualified professionals and that products are not counterfeit.
- Features of a reliable website/app include:
  - clear information about the services offered and their limitations
  - no claims about services which cannot be justified – e.g. it should not suggest that a full eye examination or device fitting can be carried out other than face-to-face
  - information on where the website is hosted (within the EU where EU rules apply or outside the EU),
  - transparency on pricing and payment terms,
  - what secure payment methods are used,
  - complete information on the professional qualifications of the people offering the service,
  - possibility of receiving personalised advice,
  - possibility of sending scanned prescription to avoid mistakes of data entry into an automated system,
  - the possibility of contacting the people in charge for advice and in case of any issues,
  - information on the available communication channels and response delays,
  - terms and conditions readily available,
  - information on how data is handled,
  - complaints procedures,
  - information about the relevant regulatory authority.

### *Relevant consumer/patient needs*

- A regular in person eye health check with an eye care professional is a fundamental part of good eye health care. This involves not only the measurement of the visual capacity but also the health of the eye to identify any abnormalities or early signs of eye disease. This cannot be replaced by an online service.
- Consumers/patients should always check that their needs can be met by the online offer and understand any limitations. Spectacles with corrective lenses (e.g. bifocals or varifocals) require adjustment to ensure the right fit and to avoid any issues, it is strictly recommended that adjustments are carried out by a professional, even if websites provide instructions to consumers/patients on how to do this themselves. If the spectacles have been bought online, this service may be an additional charge and consumers/patients should take this into account.

### *Professional consumer/patient advice*

- Consumers/patients should be aware that online optical and optometric services involve the supply of medical devices and require professionals to understand the prescriptions. Professionals should ensure that optical devices such as spectacles and contact lenses that are provided online match the specifications provided by the patient or consumer. Checking the professional qualifications of the persons behind the website or app is therefore important.
- A fully automated system where measurements are inserted by the consumer/patient alone can be faulty, in particular given the complexity of some of the technical terms used (e.g. axis, sphere, cylinder).
- Choosing an online provider with a personalised approach is recommended as it also allows for an assessment when a consumer/patient falls outside the scope of the online service.
- The consumer/patient should receive advice from a qualified professional and the communication channels used should be adapted to the need and preferences of each consumer/patient (e.g. e-mail, phone, live chat).
- Consumers/patients should not feel pushed into any purchase of a medical device and should refrain from using such service if this is the case.
- If the prescription shows any abnormalities, the consumer/patient should make an in-person appointment with an appropriate eye care professional of their choice.

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