

Policy Overview

The reasons for the Policy:

- The practice uses SMS to send text messages to patients for a range of purposes including recall, care plans, patient information and delivering test results. This protocol outlines appropriate use of the service and how it is embedded in the running of the practice.
- All patients can expect that their personal information will not be disclosed without their permission (except in the most exceptional circumstances when disclosure is required when somebody is at grave risk of serious harm).
- The General Data Protection Regulation (GDPR) requires a clear direction on Policy for security of information within the Practice and communications outside of the Practice.
- The purpose of this procedure is to ensure a consistent approach to communicating with patients via SMS, especially if notifying patients of their test results or sensitive information.
- Not all patients possess a mobile telephone and, of those who do, not all patients will want to be contacted by text, notified by text of their results.

Applicability

The policy applies to all Practice Employees and Partners, and also applies to other people who work at the Practice e.g. Locum GPs, Non-employed nursing staff, Temporary staff and Contractors (referred to as “Staff” throughout this document).

Principles

- For previously recorded consent, it is useful to remind the patient at the time of their appointment that they have agreed to receive notification by SMS messaging.
- Both patient consent and contact information should be regularly reviewed to ensure it is up-to-date. Up-to-date consent is particularly relevant for young patients as they become capable to consent for themselves.
- The Practice must clearly explain to patients how the service will be used. If the Practice plans to extend the purpose of messaging services, it must ensure it informs those who have consented with the option to opt out.
- Messages should be carefully worded to exclude specific patient health information and the contents should be held as part of the patient’s record along with an audit trail of number / date sent / delivery success.
- Avoid messaging landline numbers as there is a greater risk of third parties accessing it.
- Where patients are able to respond to an electronic message, there should be robust mechanisms in place to deal with these responses. The limitations of the system should be clear to patients, and in particular that they should not provide clinical information or ask for clinical advice via a message response.
- Always seek patient consent before sending out sensitive messages, ensure systems are robust to protect confidentiality and ensure patients can opt out easily should they change their mind.
- Messages will be clearly marked as being sent by *North Street Medical Care*.
- Under 16 year old patients will not be disadvantaged and will be appropriately assessed for capacity and consented, with updating of personal contact details if previously linked to parents records.
- The Practice staff will always obtain explicit consent from patients before including them in electronic messaging services for pathology results.

Chain SMS Setup

Responsible individuals

The practice manager and IT lead are responsible for overseeing the use of SMS messaging at the practice, embedding use within normal ways of working and using the service to improve patient care and experience. Any questions and concerns should be directed to them. They are responsible for ensuring that all practice computers have a working version of the SMS software, and that all staff are enabled and know how to use SMS services.

Providers

- The preferred provider and portal to send SMS messaging is accuRx Chain SMS.
- Backup services in the event of a system failure are available via MJOG and AQL.

Installation

Chain SMS has been installed on all practice computers. All users will be required to create an account when they use Chain SMS for the first time.

Chain SMS will install for all users of a given computer, unless the user installing does not have sufficient administrator privileges. If this is the case, an error message will be shown, and an administrator will need to run the installation for all users.

Chain SMS is updated regularly, and these updates are automatically downloaded and installed. Users may be prompted to allow certain updates permission to install, and should allow the software to do so. New or 're-imaged' computers in the practice should have Chain SMS installed as part of their installation process.

Training and familiarisation

Chain SMS has been designed to be simple and intuitive and therefore does not require extensive training, however all staff should familiarise themselves with the software by sending a message to their personal mobile, in relation to a dummy patient. All new staff will also have a brief introduction to Chain SMS and the time to familiarise themselves as part of their induction. Further training and video guides are available at <https://support accurx.com>.

Support

Most support questions can be answered by visiting <https://support accurx.com>, and this should be attempted in the first instance. If an issue remains unresolved, users can email support@accurx.com, use the Live Chat at www.accurx.com or call 020 7099 2279.

Custom signature

Users can edit the default signature (your EMIS name) that is added to messages, for example ending a message with 'The Reception Team'. Instructions on how to do this can be found at <https://support.accurx.com>.

Sender ID

Messages from the practice will appear on patients' phones as from 'NorthStreet'. The message also contains the full practice name at the end of the message, and this cannot be removed when sending a message.

Procedure

Consent

- Explicit consent is not required for routine non-sensitive SMS communication.
- It is imperative that the practice has documented, express consent from each patient to use his or her mobile phone number for SMS messaged results.
- When seeking consent from patients to provide information via a SMS text messaging service, the practice must ensure that they explain clearly the nature of the information that would be sent. This is particularly important because a patient may not be the only person who has access to their phone, and others may view the screen.
- SMS communications can only be sent to patients who have provided their mobile numbers as a form of communication on registration with the practice or thereafter.
- The practice will ensure that even where a patient has opted in to such services, they are used only for the purposes and types of communication originally intended.
- In order to comply with the above, the following pathway must be followed to document consent (see appendix for the accompanying flowchart). To launch the consent protocol:
 - type “#SMS” as a synonym readcode OR
 - launch the “NS SMS Consent” protocol via the F12 key

Sending SMS Messages

- Via accuRx:
 - Click on the floating menu dialogue box
 - Check the correct patient has been automatically loaded
 - Check if specific SMS consent or dissent codes are present
 - Pick an appropriate message template or NHS Choices advice subject
 - Amend and personalise the message if needed
 - Send or schedule a SMS to be sent
 - Schedule message to ideally be sent during practice opening hours.
- Via MJOG
 - Messages can be manually sent through the online portal via <http://f82009-spk/mjogdisplay/login.php?mode=logout> with the practice login details, and searching for patient by name or EMIS number.

SMS For Pathology Results

- For system “abnormal” & “normal” marked results:
 - If no SMS message is required
 - The result can be commented on and filed. No message will be sent.
 - To send a SMS, use the accuRx portal software to pick an appropriate template and adjust the freetext if needed.
- To ensure a standardised appropriate message from all clinicians, templates will be used wherever possible. These can be found in the accuRx dropdown menu or the shared drive under *Information Governance*:
 - *SMS Message Templates.xlsx*

Usage

Message content

There is no way of guaranteeing that a message has been read by the intended recipient, therefore:

- **Messages containing critical information should not be relied upon** (e.g. abnormal blood results requiring immediate action), unless they are followed up to ensure the information was received.
 - Use the 'letter test' – *would I be happy sending this in a postal letter that may not arrive?*
 - If the patient's mobile phone number has been verified, the delivery receipt can confirm that the message has arrived on their phone.
- **Staff should avoid sending sensitive information**, as SMS messages can be overseen and therefore may be viewed by a patient's relative, friend or colleague.
 - Sensitive information can be sent if the patient provides ad-hoc consent
 - e.g. for sending details of counselling services during a consultation
 - e.g. for answering a medication query, if reception have asked if they are happy for this to be answered by SMS when recording the query

Sending times

Text messages should not be sent to patients before 08.30 or after 20.30, unless it is felt appropriate to do so (e.g. patient awaiting an urgent prescription before their holiday). accuRx allows staff to send messages out of normal working hours late at night, but delay these until 09:00 the morning.

Delivery reports

Staff can see when a message was delivered to a patient, or if that delivery failed, by opening 'Delivery Reports' (click 'Manage Practice' in the Chain SMS menu). This list can be used to identify patients whose mobile number needs updating.

Tone

- Messages should be phrased professionally, but do not require the same level of formality as a letter.
- Text abbreviations (e.g. 'thnx', 'u') are not appropriate, and the spell-check functionality in Chain SMS should be used to remove spelling errors.
- When using a template, Chain SMS will automatically greet patients under 30 with 'Hi (first name)' and patients over 30 with 'Dear (last name)'.

Other SMS services

The practice also uses SMS services provided by MJOG for the purposes of appointment reminders, batch messaging and 2-way surveys].

Information Governance

Phone number confirmation

To be confident that SMS messages are being received by the intended recipients, it is important that patient mobile numbers are kept up-to-date. The reception team should verify a patient's mobile number at any opportunity when speaking to a patient. Other members of the team should opportunistically update mobile numbers, for example confirming a mobile number before sending patient advice at the end of an appointment.

Data Processing

Text messages should only be sent for the delivery and administration of health and care services. They must not be used for marketing third-party services, or any other reason that a patient would not reasonably expect.

accuRx Ltd are registered with the Information Commissioner's Office (reference ZA202115) and hold an up-to-date NHS Digital Information Governance Toolkit Level 2 (ODS code 8JT17).

GDPR

In accordance with The General Data Protection Regulation (EU 2016/679):

Personal data is processed under the following legal basis for the purposes of direct care and the administration of health and care services:

6(1)(e) '...for the performance of a task carried out in the public interest or in the exercise of official authority...'

Personal data concerning health is processed under the following legal basis for the purposes of direct care and the administration of health and care services:

9(2)(h) '...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...'

Personal data concerning health is processed under the following legal basis for the purposes of public health:

9(2)(j) '...necessary for reasons of public interest in the area of public health...or ensuring high standards of quality and safety of health care and of medicinal products or medical devices...'

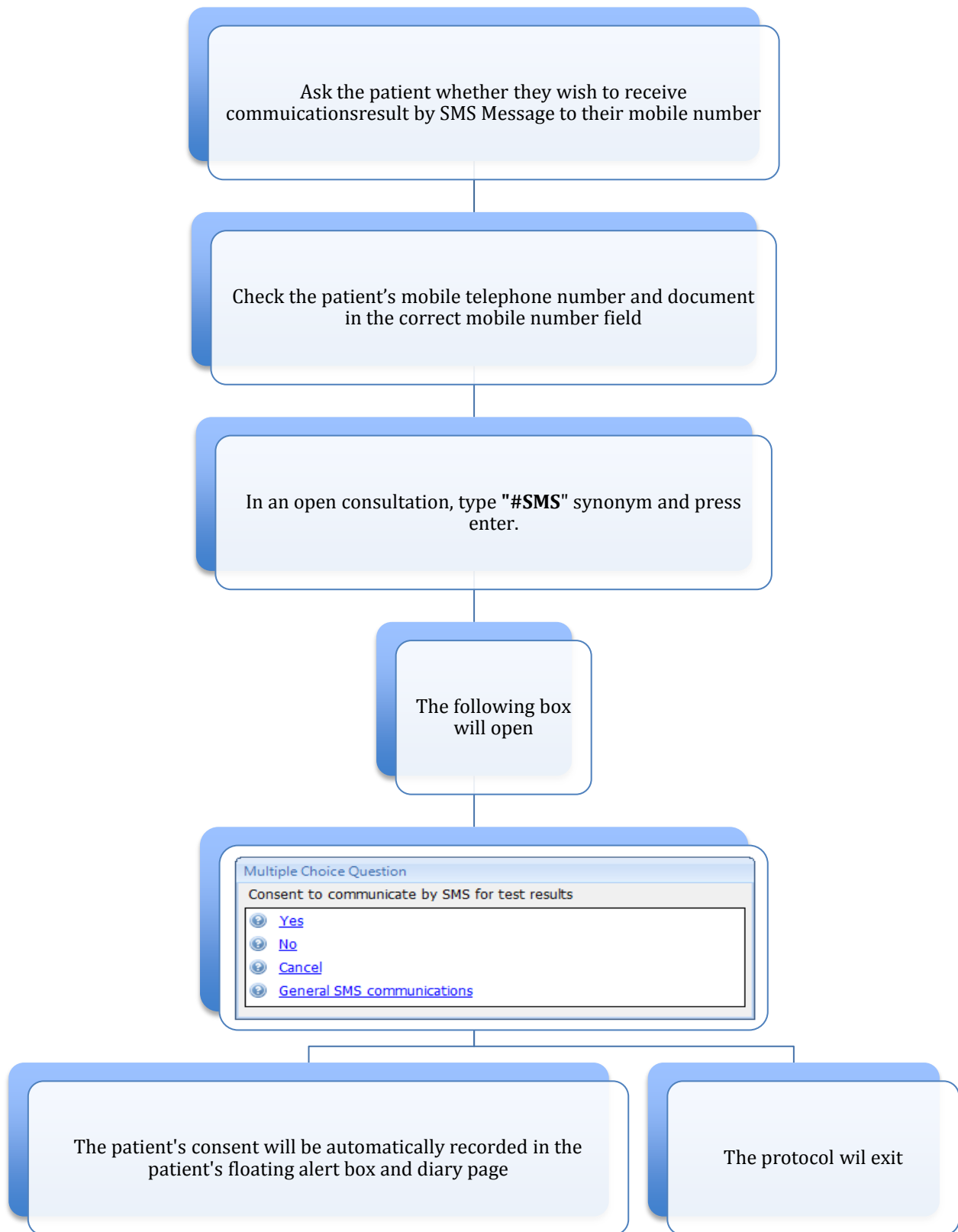
Further guidance on GDPR and the legal basis for data processing can be found at:

<https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/information-governance-alliance-iga/general-data-protection-regulation-gdpr-guidance>

Opt-out

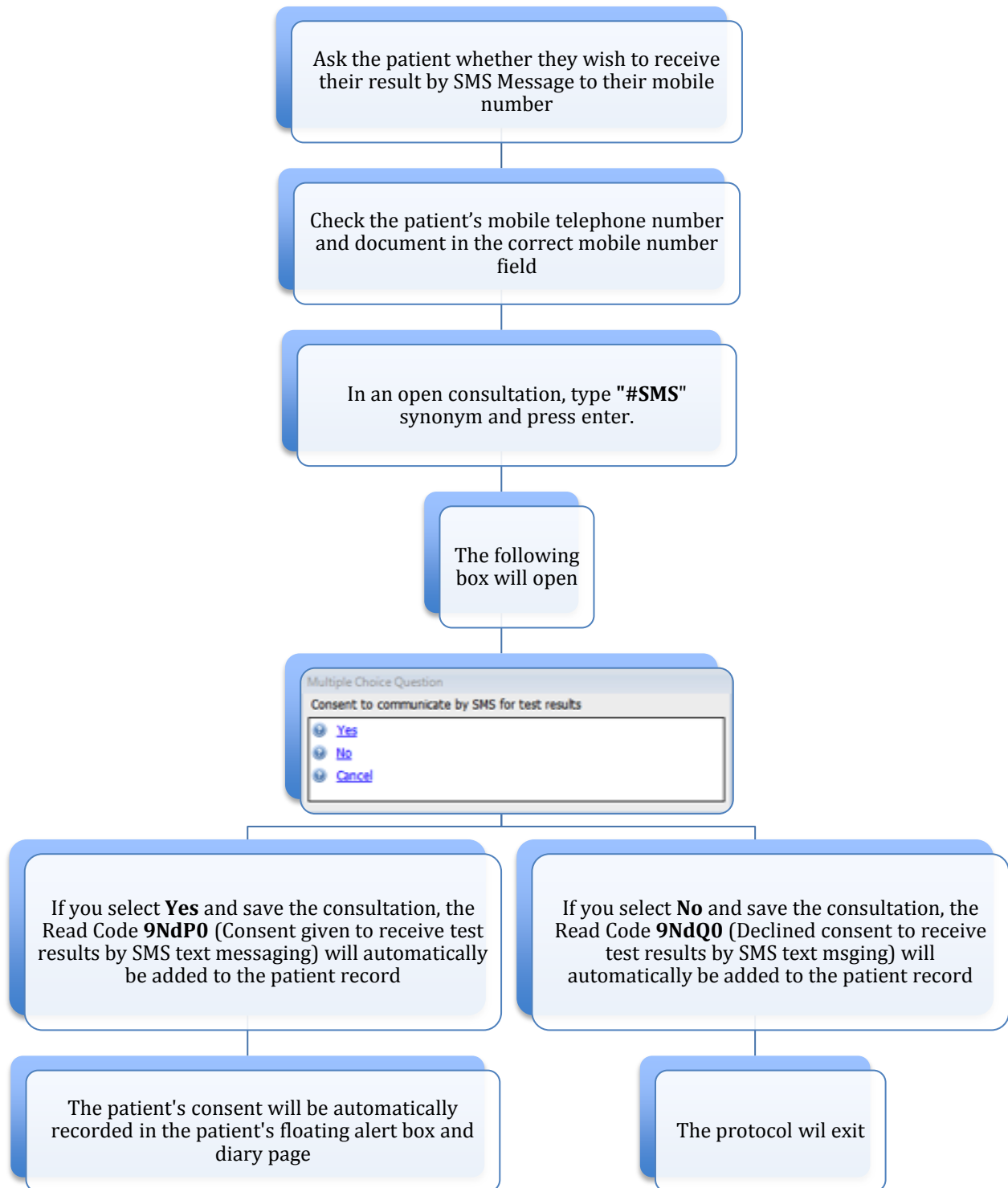
'Consent' is not used as a legal basis for data processing, and therefore messages are sent on an 'opt-out' basis. If a patient informs the practice that they do not wish to receive SMS messages, a member of staff must update their 'Notification Preferences' in EMIS. Chain SMS will show any codes related to consent and dissent when sending a message.

Appendix A



Appendix B

Test results SMS consenting and readcode documentation



Appropriate consent readcodes/SNOMED codes

- Consented/opted in codes
 - **9NdP** - Consent given for communication by SMS text messaging
 - **9NdPO** - Consent given to receive test results by SMS text messaging
 - **EMISNQCO75** - Consent given to receive test results by SMS text messaging
- Declined/opted out codes
 - **9NdQ** - Declined consent for short message service text messaging
 - **9NdQO** - Declined consent to receive test results by SMS text msging
 - **EMISNQCO73** – Consent declined for SMS messaging

Appendix C

Use cases

For full flexibility, any SMS message can be sent to a patient, therefore staff should use their individual judgement of what is appropriate. For guidance, examples are given below, and in the template library.

Appropriate messages

- Administrative information e.g. prescription ready to collect
- Care plan sent in a consultation e.g. dosing of new medication
- Recall e.g. advising the patient to book an appointment
- Advice and safety netting sent in a consultation e.g. link to NHS Choices information or MSK exercise videos
- Signposting to third-party services in a consultation e.g. exercise classes
- Normal test results e.g. Chest x-ray normal
- Some abnormal results e.g. Low Vitamin D, with advice for sun exposure and OTC supplements
- Telephone information e.g. you tried to call but could not reach them, or will be calling
- Reminders e.g. for cervical screening or overdue blood tests
- Follow-up e.g. checking a patient has received a hospital letter after a referral

Inappropriate messages

- Worrying, complex or sensitive test results e.g. STI test or high PSA
- Long or complex messages e.g. multiple medication changes
- Links to sensitive patient advice without consent e.g. family planning advice
- Signposting to third-party services without consent e.g. Macmillan contact details
- Critical information without follow-up e.g. urgent appointment required