

PROCEDURE FOR PATIENT ONLINE ACCESS

Introduction

In order to support the 2014/15 and 2015/16 GP Contract, this procedure relates to patients requesting access to elements of their record via online services (Patient Access). As stipulated on the 2014/15 GP Contract, contractual obligations for Patient Online Access were to allow patient the ability to:

- Book/cancel appointments
- Order Repeat prescription
- View Summary Information (allergies, adverse reactions and medications)

The 2015/16 GP contract has been enhanced and now stipulates that practices are also to allow patients:

- Detailed Coded Records Access (DCRA)

Patients accessing their records online will have access to limited information. As a result of this, the patient continues to have the right to submit a Subject Access Request under the Data Protection Act 1998. However, as this differs from access via online services the patient must submit this request in writing to the Practice. The Practice still have the right to charge a fee for providing the information in a printed form, though should Patients accessing their Coded Data online are able to copy and paste or print the information from the screen thus there is no fee for this.

Registration for Patient Access (online services)

This Practice accepts applications from patients as well as their proxy for adults. Proxy access refers to access to online services by somebody acting on behalf of the patient with the patient's consent.

The appropriate application form must be completed prior to any online access being enabled. Appendix A – Application for Online Access to my Medical Record should be used for patient's wanting to access their own detailed coded information held within their medical record.

- The application form includes: Password confidentiality is the responsibility of the patient.
- Advice on unexpected bad news and/or abnormal results.
- Guidance on incorrect information/errors noting that the patient has responsibility for informing the Practice, including where incorrect information or an error has been found.

The Practice reserves the right to review and remove access at any point in the future if it is thought that it is in the best interests of the patient or if the services are being misused.

ID Verification

ID verification is required to ensure access is granted to patients/proxy users that have a legitimate reason to access a record. This will prevent access being granted to the wrong person and support the Practice to adhere to information security guidelines.

There are a number of options for identification verification including:

Documentation

Two forms of documentation must be provided as evidence of identity, one of which must contain a photograph. Acceptable documents include passports, photo driving licences and bank statements. If none of the above is available household bills may be accepted at the discretion of the Operations Manager and Senior Receptionist.

Self-Vouching

Vouching for a patient's identity requires an authorised member of the Practice staff who knows the patient well enough to verify that they are who they say they are, and that no deception is taking place. Self-vouching will not be considered as usual practice and will be at the discretion of the Managing Partner.

Documentary evidence that confirms identification checks have taken place will include:

- the nature of those checks.
- who did them and when.
- completed registration form (to avoid non-clinical information being stored in patient records, copies of bank statements, passports and other personal documentation will not be scanned into those records).

Timescales

The Practice Reception Team grant access to patients who present with the correct identification, for appointments and medication. If patients request access to their detailed coded information they will be notified that it may take up to 14 days to review their application. This is a guide only and in some circumstances may take longer.

Considerations/Approval of Access

The Practice will not approve on-line access to detailed coded information if it is deemed that it may cause physical and/or mental harm the patient.

Applications for Access to Detailed Coded Records will be received and administered by the Reception Team who will refer to the patients named GP (or their Practice 'buddy') for assessment and a decision on level of approval to be granted. The GP will include in their consideration the significance of patients on certain registers for example, learning difficulties register, mental health or have been identified as a possible victim/perpetrator of domestic abuse and:

Mental Health Problems

- Patients within the Practice with a mental illness have as much right as any patient to have access to their records, however:
 - if there is a likelihood that access to their record may cause an individual physical or mental harm then it may be necessary to redact some of the information within their record, or
 - in extreme circumstances, refuse access to the whole record, in this circumstance the named GP responsible for the care of the patient will have a conversation with the patient to explain the reasons for refusal of access.

Access for children, parents and guardians

- Proxy Access to Detailed Medical Records will not be granted to parents or guardians of children 16 or under. This is to maintain high safeguarding standards and acknowledge that the EMIS system has limitations in its ability to automatically disable access.
- Children 11 or under will not be given Access to Detailed Medical Records Online.
- If a child between 11 and 16 applies for access to their Detailed Coded Medical Records Online a competency assessment will be carried out by the named GP. A child deemed competent may have access to their online record

Proxy Access

A competent patient can choose and consent to allow access to relatives and/or carers. The form included in Appendix 3 must be completed.

The patient will authorise a Proxy Application in the following circumstances:

A patient who has been deemed as competent has authorised and consented to online access.

- Ensure the level of access granted to the proxy is appropriate and does not exceed what has been agreed by the patient

Coercion

'Coercion' is the act of governing the actions of another by force or by threat, in order to overwhelm and compel that individual to act against their will.

The Practice will include the implications of coercion during the patient application process for online services by way of issuing them with a patient leaflet detailing the implications.

The Practice will consider the risk of coercion on a case by case basis as requests for access are received, and if necessary will decline access.

The patient's named GP will discuss with the applicant the reasons for refusal of access.

If coercion is identified as a risk with regard to a patient previously registered for online services, then access will be immediately removed.

Levels of Access for Patients

There are different levels of access available to patients. All requests for online access will be dealt with on a patient by patient basis and the suggested access will be granted within the agreed timescales. All patients must be deemed competent to be granted access to detailed coded data, however, some elements may be marked as sensitive/confidential and will not be shared via online services. Access levels can be as follows:

- Appointments, Repeat Prescriptions and Summary Information.
- Appointments, Repeat Prescriptions and Detailed Coded Record Access.

Patient Access does not override a patient's right to submit a Subject Access Request which will be processed following our Practice protocol in line with the Data Protection Act 1998.

The Practice will not automatically grant access to detailed coded data to those patients currently with access to appointments, repeat prescription and summary information. Patients wanting access to their detailed coded information MUST complete and submit an additional Access Request form. At any point the Practice can revoke online access to patients if the functionality is abused. This will be dealt with internally following Practice protocols as stated as above.

Appointments

This Practice will allow a patient to pre-book up to four appointments in advance (regardless of how these appointments are made). Online appointments cannot be made if the patient has reached four appointments in advance.

There is a process in place for any patient abusing the online appointment booking services, as follows:

- The Practice will issue an initial warning letter.
- If the action continues the Practice will suspend access for two calendar months.
- The Practice will then reinstate the functionality to the patient.
- If the abuse continues the Practice will inform the patient that their ability to book/cancel online appointments will be removed on a permanent basis.

The number and type of appointments made available via online services are as follows:

- GP appointment

Repeat Prescriptions

Management of all prescriptions is detailed in the Pocklington Group Practice Prescribing Policy available on the intranet.

Patients may order repeat prescriptions on line via Patient Access, by handing in or posting the repeat prescription slip to the surgery or by fax. The dispensary will prepare the prescription for the doctor to check and sign. Requests will only be accepted for items which have previously been agreed by the doctor as suitable for repeat ordering and for which the quota of issues before a required review has not been used up. Prescriptions will be available after two full working days (excluding weekends).

Hiding Sensitive Consultations

All domestic abuse consultation will be highlighted as confidential and will therefore be removed from online viewing. This must be made clear to patients that anything they say in relation to this during a consultation will not be viewable online.

Any consultations of a sensitive nature may be highlighted as confidential. Access to online records will be on a patient by patient basis.

3rd Party Information

This Practice will not share any information held within a clinical record that is deemed as 3rd party information without explicit consent from the 3rd party. Any of our patients wanting access to these details must make the Practice aware by submitting a Subject Access Request.

Contents of a Medical Record

During the patient online registration process patients will be issued with a patient online leaflet which informs them that their medical record may contain information that is historical and therefore forgotten, not relevant to themselves (including scanned letters), bad news or may show abnormal test results. If patients do identify any such information, it is their responsibility to notify the Practice immediately so the appropriate action can be taken.

Relevant reference documents to support policy:

Information Governance guide

www.nhs.uk/patientonline

<http://elearning.rcgp.org.uk/patientonline>

<http://www.england.nhs.uk/ourwork/pe/patient-online/>

Promoting Patient Access

This Practice will promote the Patient Access service to all patients using a number of methods to raise awareness. Methods of promotion to be used are as follows:

- Display of Patient Access posters within the health education room.
- Right-hand side of prescription.
- Practice Website.
- Patient engagement forums.

Appendix A: Application for online access to my medical record

Surname	Date of birth
First name	
Address (including postcode)	
Email address	
Telephone number	Mobile number

I wish to have access to the following online services (please tick all that apply):

1. Booking appointments	<input type="checkbox"/>
2. Requesting repeat prescriptions	<input type="checkbox"/>
3. Limited access to parts of my medical record	<input type="checkbox"/>

I wish to access my medical record online and understand and agree with each statement (tick)

1. I have read and understood the information leaflet provided by the Practice	<input type="checkbox"/>
2. I will be responsible for the security of the information that I see or download	<input type="checkbox"/>
3. If I choose to share my information with anyone else, this is at my own risk	<input type="checkbox"/>
4. I will contact the Practice as soon as possible if I suspect that my account has been accessed by someone without my agreement	<input type="checkbox"/>
5. If I see information in my record that is not about me or is inaccurate, I will contact the Practice as soon as possible	<input type="checkbox"/>

Signature	Date
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Patient NHS number		Practice computer ID number	
Identity verified by (initials)	Date	Method Vouching <input type="checkbox"/> Vouching with information in record <input type="checkbox"/> Photo ID and proof of residence <input type="checkbox"/>	
Authorised by			Date
Date account created			
Date passphrase sent			
Level of record access enabled Contractual minimum <input checked="" type="checkbox"/>		Notes/explanation	
Other.....			

Appendix B

Accessing GP Records Online

Pocklington Group Practice - Patient Information Leaflet

Practices are increasingly enabling patients to be able to request repeat prescriptions and book appointments online.

Some patients may wish to access more information online and contractually from 01 April 2015 practices are obliged to assist access to medications, allergies and adverse reactions as a minimum and from the 01 April 2016 coded data.

However this requires additional considerations as outlined in this leaflet. You will be asked that you have read and understood this leaflet before consenting and applying to access your records online. The Practice will also need to verify your identity.

Please note:

- **It will be your responsibility to keep your login details and password safe and secure. If you know or suspect that your record has been accessed by someone that you have not agreed should see it, then you should change your password immediately.**
- **If you can't do this for some reason, we recommend that you contact the Practice so that they can remove online access until you are able to reset your password.**
- **If you print out any information from your record, it is also your responsibility to keep this secure. If you are at all worried about keeping printed copies safe, we recommend that you do not make copies at all.**
- **The Practice may not be able to offer online access due to a number of reasons such as concerns that it could cause harm to physical or mental health or where there is reference to third parties. The Practice has the right to remove online access to services for anyone that doesn't use them responsibly.**

Key considerations

Forgotten history

There may be something you have forgotten about in your record that you might find upsetting.

Abnormal results or bad news

If your GP has given you access to test results or letters, you may see something that you find upsetting to you. This may occur before you have spoken to your doctor or while the surgery is closed and you cannot contact them.

Choosing to share your information with someone

It's up to you whether or not you share your information with others – perhaps family members or carers. It's your choice, but also your responsibility to keep the information safe and secure.

Coercion

If you think you may be pressured into revealing details from your patient record to someone else against your will, it is best that you do not register for access at this time.

Misunderstood information

Your medical record is designed to be used by clinical professionals to ensure that you receive the best possible care. Some of the information within your medical record may be highly technical, written by specialists and not easily understood. If you require further clarification, please contact the surgery for a clearer explanation.

Information about someone else

If you spot something in the record that is not about you or notice any other errors, please log out of the system immediately and contact the Practice as soon as possible.

More information

For more information about keeping your healthcare records safe and secure, you will find a helpful leaflet produced by the NHS in conjunction with the British Computer Society: Keeping your online health and social care records safe and secure:

www.nhs.uk/NHSEngland/thenhs/records/healthrecords/Documents/PatientGuidanceBooklet.pdf

Appendix C: Consent to Proxy Access to GP Online Services

Pocklington Group Practice

Note: If the patient does not have capacity to consent to grant proxy access and proxy access is considered by the Practice to be in the patient’s best interest, section 1 of this form may be omitted.

Section 1

I,..... (name of patient), give permission to my GP practice to give the following people proxy access to the online services as indicated below in section 2.

.....

I reserve the right to reverse any decision I make in granting proxy access at any time.

I understand the risks of allowing someone else to have access to my health records.

I have read and understand the information leaflet provided by the Practice.

Signature of patient	Date
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Section 2

1. Online appointments booking	<input type="checkbox"/>
2. Online prescription management	<input type="checkbox"/>
3. Limited access to parts of the medical record for(name of patient)	<input type="checkbox"/>

Section 3

I/we..... (names of representatives) wish to have online access to the services ticked in the box above in section 2 for (name of patient).

I/we understand my/our responsibility for safeguarding sensitive medical information and I/we understand and agree with each of the following statements:

1. I/we have read and understood the information leaflet provided by the Practice and agree that I/we will treat the patient information as confidential.	<input type="checkbox"/>
2. I/we will be responsible for the security of the information that I/we see or download.	<input type="checkbox"/>
3. I/we will contact the Practice as soon as possible if I/we suspect that the account has been accessed by someone without my/our agreement.	<input type="checkbox"/>
4. If I/we see information in the record that is not about the patient, or is inaccurate, I/we will contact the Practice as soon as possible. I/we will treat any information which is not about the patient as being strictly confidential.	<input type="checkbox"/>

Signature/s of representative/s	Date/s
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The patient (the person whose records are being accessed)

Surname	Date of birth
First name	
Address including postcode	
Email address	
Telephone number	Mobile number

The representatives (the people seeking proxy access to the patient's online records, appointments or repeat prescription.)

Surname	Surname
First name	First name
Date of birth	Date of birth
Address including postcode	Address including postcode (tick if both same address <input type="checkbox"/>)
Email	Email
Telephone	Telephone
Mobile	Mobile

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The patient's NHS number		The patient's practice computer ID number	
Identity verified by (initials)	Date	Method of verification Vouching <input type="checkbox"/> Vouching with information in record <input type="checkbox"/> Photo ID and proof of residence <input type="checkbox"/>	
Proxy access authorised by			Date
Date account created			
Date passphrase sent			
Level of record access enabled		Notes/comments on proxy access	
Contractual minimum <input type="checkbox"/>			
Other.....			