**QUEEN EDITH MEDICAL PRACTICE**

**Patient Online Access Policy**

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 online services

This practice accepts applications from patients as well as their proxy. 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 a patient information leaflet giving advice and guidance on the following:

* 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**

As is current practice that should there be a request for Online Access, 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 Practice Manager.

**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 Practice Manager.

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.)

At the point of request for Patient Online Access patients will be provided with the Patient Access Registration Form (Appendix A) and a Patient Information Leaflet, (Appendix B).

**Timescales**

The Practice Admin Team will be able to grant access to patients who present with the correct identification, for appointments and medication immediately in most circumstances\*.

If patients request access to their detailed coded information they will be notified that it may take the practice up to 28 days to review their application and grant access if appropriate.

**This is a guide only and in some circumstances may take longer.**

\*Unless this is a ‘proxy’ application or an application for a patient aged 11-15 years old – please see separate sections below for these below.

**Considerations/Approval of Access**

1. 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.
2. Patient records will be checked by trained members of staff within the practice the names of which will be communicated internally.
3. Named staff will be responsible for checking if patients are on certain registers for example, learning difficulties register, child protection register, mental health or have been identified as a possible victim/perpetrator of domestic abuse. Named staff will consult with the patients usual GP if required before access is granted /denied.
4. Named staff will consider the following:

* 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.

**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.

* If the patient **has capacity** to authorise consent they will need to sign the Proxy Access registration form indicating their agreement to the relative/carer having access to their online record. The practice will ensure the level of access granted to the Proxy is appropriate and does not exceed what has been agreed by the patient.
* 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, the patient **will not** need to sign the form. This will be decided on a case by case basis and the patient and carer may need an appointment with a clinician to assess competency. The practice will ensure the level of access granted to the Proxy is appropriate to the patient’s needs.

**Access for children, parents and guardians**

* A parent/carer may apply for Proxy Access for children up to the age of 10 years.
* The parent/carer will need to provide proof of relationship to the child – e.g. Birth Certificate
* Proxy access will automatically be disabled when a child reaches the age of 11.
* A competency assessment will then need to be carried out with a clinician to ascertain if the child is able to make an informed choice regarding access to their records.
* A child deemed competent may have access to their online record independently or authorise a parent/carer to have Proxy Access. If authorising Proxy Access the child will need to sign the Proxy Access registration form indicating that their consent.
* Where a child is deemed **not** to be competent, a parent/guardian/carer can apply again for Proxy Access and the child will not need to sign the Proxy Access Registration Form**. (**This will be reviewed by the practice annually, or when the child attends a further appointment – whichever is the sooner)
* The practice will aim to contact parents/carers of children approaching their 11th birthday to remind them that online access could potentially cease, and invite them to come to the surgery for a discussion regarding options available

**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. This will be considered within the practice and granted if deemed appropriate within 28 days.

At any point the practice can revoke Online Access to patients if the functionality is abused. The patient will be contacted in writing to inform them of this decision and the reason for revoking access.

**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.

**Third Party Information**

This practice will not share any information held within a clinical record that is deemed as Third Party Information without explicit consent from the Third 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 on which they are notified 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 we can take the appropriate action.

**Appointment Booking**

This practice will allow a patient to pre book up to 2 appointments via the online booking system. Currently, only GP appointments are available to book online at the practice.

There is a process in place for any patient abusing the online appointment booking services (for example repeatedly booking appointments and not attending), 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.

Repeat Prescriptions

Please allow a minimum of 48 hours from submitting your request online to collecting from the prescription from the practice. If you have specified that you wish to collect your medication from your designated pharmacy then please allow an extra 24 hours.

Promoting Patient Online

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

* Display of Patient Online posters within patient waiting areas
* Ad-Hoc prescription messages
* Practice Website
* PPG Newsletter

***Relevant reference documents to support policy:***

[Information Governance guide](http://elearning.rcgp.org.uk/pluginfile.php/74124/mod_folder/content/0/PatientOnline-Information_governance-guidance.pdf)

[www.nhs.uk/patientonline](http://www.nhs.uk/patientonline)

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

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

Appendix A

# Application for online access to my medical record

|  |  |
| --- | --- |
| Surname | Date of birth |
| First name | |
| Address      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 | 🞏 |
| 1. Requesting repeat prescriptions | 🞏 |
| 1. Limited access to parts of my medical record (Detailed Coded Data) | 🞏 |

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 | 🞏 |
| 1. I will be responsible for the security of the information that I see or download | 🞏 |
| 1. If I choose to share my information with anyone else, this is at my own risk | 🞏 |
| 1. I will contact the practice as soon as possible if I suspect that my account has been accessed by someone without my agreement | 🞏 |
| 1. If I see information in my record that is not about me or is inaccurate, I will contact the practice as soon as possible | 🞏 |

|  |  |
| --- | --- |
| Signature | Date |

### For practice use only

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Patient NHS number | | Practice computer ID number | | |
| Identity verified by  (initials) | Date | Method  Vouching 🞏  Vouching with information in record 🞏  Photo ID and proof of residence 🞏 | | |
| Authorised by | | | | Date |
| Date account created | | | | |
| Date passphrase sent | | | | |
| Level of record access enabled  Contractual minimum √  Other……………………. ……… | | | Notes / explanation | |

Appendix B

**Accessing GP Records Online**

**[Insert Practice Name] - 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 1st April 2015 practices are obliged to assist access to medications, allergies and adverse reactions as a minimum and from the 1st 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. |

|  |  |
| --- | --- |
| **Queen Edith Medical Practice** | **PLEASE NOTE:**  **Children aged 0 – 10 years –** section 1 does not need to be completed  **Children aged 11 – 15 years**  The child MUST sign the consent for parent/guardian to access their details in Section 1 unless note marked \* below applies (to be decided by Practice) |

**Consent to proxy access to GP online services**

**\*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 |

**Section 2**

|  |  |
| --- | --- |
| Online appointments booking | 🞏 |
| Online prescription management | 🞏 |
| Accessing the Detailed Coded Record for **(name of patient)** | 🞏 |

**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 will treat the patient information as confidential | 🞏 |
| I/we will be responsible for the security of the information that I/we see or download | 🞏 |
| 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 | 🞏 |
| 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 will treat any information which is not about the patient as being strictly confidential | 🞏 |

|  |  |
| --- | --- |
| Signature/s of **representative/s** | Date/s |

**The patient**

(This is the person whose records are being accessed)

|  |  |
| --- | --- |
| Surname | Date of birth |
| First name | |
| Address  Postcode | |
| Email address | |
| Telephone number | Mobile number |

**The representatives**

(These are 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  Postcode | Address (tick if both same address 🞏)  Postcode |
| Email | Email |
| Telephone | Telephone |
| Mobile | Mobile |

**For practice use only**

|  |  |  |  |
| --- | --- | --- | --- |
| The patient’s NHS number | |  | |
| Identity verified by  (initials) | Date | Method of verification  Vouching 🞏  Vouching with information in record 🞏  Photo ID and proof of residence 🞏 | |
| Proxy access authorised by : | | | Date |
| Date account created | | | |
| Date passphrase sent | | | |
| Level of record access enabled    Prospective 🞏  Retrospective 🞏  All 🞏  Limited parts 🞏  Contractual minimum 🞏 | | Notes / comments on proxy access | |