Procedure for Patient Online Access

Introduction

In order to support the 2014/15 and 2015/16 GP Contract, this leaflet gives information relating to patients requesting access to elements of their record via online services (Patient Access). As stipulated in 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 has the right to charge a fee for providing this service.

Registration for online services

The appropriate application form must be completed prior to any online access being enabled.
"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
As is current practice, should there be a request for Online Access, at least two forms of documentation must be provided as evidence of identity, one of which must contain a photograph. Acceptable photo ID includes

passports & photo driving licences. Additionally, a bank statement or household utility bill is to be provided that is dated within the last 3 months.

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 or Named GP

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 are to be provided with the Patient Access Registration Form and a Patient Information Leaflet.

Timescales
Practice Admin Team will be able to grant access to patients who present with the correct identification, for appointments and medication on request. If patients request access to their detailed coded information they will be notified that it may take the practice up to 14 days to review their application and grant access if appropriate.

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.
Patient records will be checked by trained members of staff within the practice the names of which will be communicated internally.
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.
Named staff will consider the following:

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

- Child access will automatically be disabled when a child reaches the age of 11
- A competency assessment will be carried out. Regardless of outcome a parent/guardian/carer will re-apply using the Proxy Access Registration Process, where a competent child must authorise the request for Proxy Access. This will be at the discretion of a clinician.
- A child deemed competent may have access to their online record or authorise a parent/carer to have Proxy Access
- Where a child is deemed not to be competent, a parent will apply for access but will be registered as a Proxy User. **(**This will be reviewed by the practice annually, or when the child attends a further appointment – whichever is the sooner)

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

100% of routine GP appointments will be available online. Nurse appointments are not available online due to the complexity of condition review timings.

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

Repeat prescriptions can be ordered using EMIS patient access. In addition, all patients are reminded that St. Clements Partnership Offer EPS (Electronic Prescription Service). This facility will allow you to nominate a local

pharmacy of your choice; and prescriptions will be sent 'electronically' to the pharmacy meaning that you do not have to come to the surgery to collect prescriptions .

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
- Practice Website
- Verbally with the patient

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/

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	☐
2. Requesting repeat prescriptions	☐
3. Limited access to parts of my medical record	☐

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	☐
2. I will be responsible for the security of the information that I see or download	☐
3. If I choose to share my information with anyone else, this is at my own risk	☐
4. I will contact the practice as soon as possible if I suspect that my account has been accessed by someone without my agreement	☐
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	☐

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 ☐ Or Full coded ☐	

Accessing GP Records Online
St Clements Partnership 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 were 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 email the practice as soon as possible. *whccg.stclementssurgery@nhs.net*

Your enquiry will be answered as soon as possible.