The Provision of Access to Online Services

Kingsmead Healthcare

GP online services is an NHS England programme designed to support general practices to confidently offer these online services to patients, increasing choice and convenience for patients and responding to their needs.These include online booking of appointments, ordering repeat prescriptions and access to detailed coded information held in patients’ records.

Patient Online or online access to the Practice’sclinical system is through using apps or web browser provided by the GP system suppliers. They operate on computers, tablets and smartphones.

**Introduction**

This protocol relates to patientsaged 16 years and over requesting access to elements of their record via online services. These include:

* Book/cancel appointments
* Order Repeat prescription
* ViewSummary Information (allergies, adverse reactions and medications)
* Detailed Coded Records Access (DCRA)

Patients accessing their records online will have access to limited information. As a result ofthis, the patient continues to have the right to submit a Subject Access Request under theData Protection Act 1998. However, as this differs from access via online services thepatient must submit this request in writing to the practice. Patientsaccessing their Coded Data online are able to copy and paste or print the information fromthe screen

**Registration for online services**

Kingsmead Healthcare accepts applications from patients as well as their proxy. Proxy accessrefers to access to online services by somebody acting on behalf of the patient with thepatient’s consent.

The appropriate application form must be completed prior to any online access beingenabled.

Appendix A –Application for online access to my medical record should be used for patient’swanting to access their own detailed coded information held within their medical record.

* 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 to inform the practice with details of 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 isthought 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 alegitimate reason to access a record. This will prevent access being granted to the wrongperson and support the practice to adhere to information security guidelines. There are anumber of options for identification verification including:

**Documentation**

As is current practice, should there be a request for Online Access, two forms ofdocumentation must be provided as evidence of identity, one of which must containa photograph. Acceptable documents include passports, photo driving licences andbank statements. If none of the above is available household bills may be acceptedat the discretion of the surgery.

**Vouching**

Vouching for a patient’s identity requires an authorised member of the practice staffwho knows the patient well enough to verify that they are who they say they are,and that no deception is taking place. Vouching might therefore be appropriate for patients who havebeen registered for a short period involving frequent appointments,as well as for patients registered for a long time but seen lessfrequently.

Self-vouching will not be considered as usualpractice and will be at the discretion of the surgery.

Documentary evidence that confirms identification checks have taken place willinclude:

* 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 thePatient Access Registration Form (Appendix A) and a Patient Information Leaflet(Appendix B).

**Timescales**

The Practice Management/Admin Team will be able to grant access to patients who presentwith the correct identification, for appointments and medication on request.

If patients request access to their detailed coded information they will be notified that itmay take the practice up to 14 days to review their application and grant access ifappropriate. This is a guide only and in some circumstances may take longer.

**Considerations/Approval of Access**

The practice will not approve online access to detailed coded information if it is deemedthat it may cause physical and/or mental harm the patient.

Patient records will be checked by trained members of staff within the practice the namesof which will be communicated internally.

The Manager/Deputy Practice Manager and a GP will be responsible for checking if patients are on certain registers forexample, learning difficulties register, child protection register, mental health or have beenidentified as a possible victim/perpetrator of domestic abuse. Senior ThePractice Management team will consult with the patients usual GP if required before access is granted ordenied.

The above 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.

**Proxy Access**

A competent patient can choose and consent to allow access to relatives and/orcarers. 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 toonline access.

* Circumstances when the practice will consider authorising proxy access WITHOUT the patient’s consent will be when a child 11-16 has been assessed and is deemed as not being competent to make a decision on granting proxy access. Should there be such circumstances the practice will: Ensure the patient has provided consent to the Proxy application
* Ensure the level of access granted to the Proxy is appropriate and does not exceed what has been agreed by the patient
* Contact families/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 tooverwhelm and compel that individual to act against their will.

The practice will include the implications of Coercion during the patient application processfor 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 accessare 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 onlineservices, 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 willbe dealt with on a patient by patient basis and the suggested access will be granted withinthe agreed timescales. All patients must be deemed competent to be granted access toDetailed Coded Data. However, some elements may be marked as sensitive/confidential andwill 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 whichwill 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 patientscurrently with access to appointments, repeat prescription and Summary Information.Patients wanting access to their Detailed Coded Information MUST complete and submit anadditional Access Request form. This will be considered within the practice and granted ifdeemed appropriate within 14 days. This is a guide only and in some circumstances maytake 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**

This practice will allow a patient to book GP appointments in advance on line.

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

* If a patient fails to attend 3 appointments in 12 months, their on-line account will be locked.
* The patient will have to ring the practice to have their account unlocked and explain why appointments were not cancelled.
* 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**

Patients with repeat medications that have been reviewed by the GP can order these via online services. Repeat medication requests can be made up to 5 days in advance of theprescription becoming due. Patients should be made aware that they must leave 48 hoursbefore trying to collect their prescription from the nominated chemist.

**Hiding sensitive consultations**

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

Any consultations of a sensitive nature may be highlighted as confidential. Access to onlinerecords 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 as3rd Party Information without explicit consent from the 3rd Party. Any of our patientswanting access to these details must make the practice aware by submitting a SubjectAccess Request.

**Contents of a medical record**

During the patient online registration process patients will be issued with a Patient onlineleaflet on which they are notified that their medical record may contain information that ishistorical 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 itis there responsibility to notify the practice immediately so we can take the appropriateaction.

**Promoting Patient Online**

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

* Display of Patient Online posters within patient waiting areas
* Right-hand side of prescription
* Practice Website
* Practice Quarterly Newsletter
* Verbal advisement

Relevant reference documents to support policy:

[Information Governance guide](https://www.england.nhs.uk/ig/)

[Using GP Online Services](https://www.nhs.uk/nhs-services/gps/using-online-services/)

[Patient Access](https://www.patientaccess.com/)

**Appendix A**

Application for online access to my medical record.

Please refer to application form under separate cover.

**Appendix C**

Application for online access by proxy

Please refer to application form under separate cover.

**Appendix B**

**Patient Information: What you need to know about your GP online records**

Wouldn’t it be great if you could look at your GP records online? Well, you can! You canalso book and cancel appointments at your GP surgery and order repeat prescriptionsonline. You can already see some of the information in your GP online records, includingyour medications and allergies. In time, you will be able to see even more.This will include illnesses, immunisations and test results. Each GP surgery will make thisinformation available at different times, as their computer systems become ready.

Just like online banking, you can look at your GP records on a computer, a tablet or asmartphone, using a website or an app. If you would like to start using online services, seethe Getting Started with GP Online Services guide for more information. Information onhow to get started is contained in this document along with links to various NHS advice and guidance websites.

**What’s in it for you?**

You can look at your records whenever you choose to, without needing to print them.Online records are up to date and more secure than a printed paper record which could getlost or seen by others.

People who have long term conditions, for example diabetes, hypertension or coronaryheart disease, have found that looking at their test results online helps them make positivechanges to improve their health. They can see if their condition is improving or gettingworse by looking at past test results. Adam, a patient at University Health Centre said‘Record access is useful for those, like me, who need to have more regular contact with theirGP’.

You can look at your medical records before your appointment to see if there is anythingyou need to discuss with your doctor or nurse. This could be your test results, illnesses youhave had in the past or any new information added to your records. This would help youdiscuss any concerns you may have and help you benefit more from your appointment.

Sometimes when you see your doctor, you are given a lot of information which you may notbe able to remember it later. You may also want further information once you have hadtime to think about what was said. You can look at your online records after yourappointment to make sure you understood what your doctor or nurse said.

One of the most useful things patients have found is that you can make sure your medicalinformation is accurate. For example, you will be able to let your doctor know if you have anallergy to a medicine and it is not recorded.

Before you go on holiday, you can check if your vaccinations are up to date without havingto go to your surgery.

**Understanding your records**

Your records are written to help medical people look after you and so in some cases, youmay not understand everything you see. If you find anything difficult to understand, as wellas talking to your doctor or nurse, you can go to the NHS Choices website by using this linkwww.nhs.uk. NHS Choices is the NHS website for patients so you can look for informationon illnesses, improving health and to find NHS services in your local area.

Other websites frequently used to search for information on illnesses and test results arePatient – [www.patient.info](http://www.patient.info)and Lab Test Online UK – [www.labtestsonline.org.uk](http://www.labtestsonline.org.uk). Althoughthese are not owned or checked by the NHS, other patients have found them useful.

**A few things to think about**

There are a few things you need to think about before registering for online records. Onvery rare occasions:

Your GP may not think it in your best interest for you to look at your GP records online. Ifthis happens, your GP will discuss their reasons with you. It is up to your GP to decide if youshould be allowed access to your online records.

You may see your test results before your doctor has spoken to you about them. This maybe when you cannot contact your surgery, or when your surgery is closed. This means youwill need to wait until an appointment is available to talk to your doctor.

Information in your medical records might need correcting. If you find something you thinkis not correct, you should contact your surgery. Clinical staff will be able to answer yourquestions and set things right when needed. If an additional entry needs to be made onyour record, this will be performed by a GP. Please bear in mind that you cannot change therecord yourself.

There may be information in your medical records that you did not know was there or thatyou had forgotten about, such as an illness or an upsetting incident. If you see anything youdid not know about that worries you, please speak to your surgery and they will discuss thiswith you.

If you see someone else’s information in your record, please log out immediately and letyour surgery know as soon as possible.

If you have questions about any of the above points, please talk to your surgery and theywill be able to advise you further.