



Policy for Patient Online Access

Introduction

In order to support the GP Contract, this procedure relates to patients requesting access to elements of their record via online services. As stipulated in the GP Contract, contractual obligations for Patient Online Access were to allow patient the ability to:

- Find, book and cancel doctor appointment slots.
- Make requests for your repeat prescriptions, check dosage instructions, issue dates and number of remaining issues on repeats.
- Access information about the prescription item from your online access account.
- Access your Summary Care Record (which should show your medication, allergies and sometimes significant past medical history).
- Send non-urgent messages to the practice through the online system.
- Access your detailed health record: From April 2016, patients are able to request online access to their detailed coded record (in addition to all the above features). It will be the policy of this practice to assess individual requests from a clinical perspective. Access to detailed health records may be withheld if there is risk of serious harm to the mental or physical health of the patient or a third party by their release. Access will not be denied unless there is good reason. Please contact the reception for more information.

From 25.5.18 the General Data Protection Regulation (GDPR) comes into force and this changes patients' rights around access to their health records.

From this date, patients accessing their records online will normally have access to limited information ie only their coded record. Patients continue to have the right to submit a Subject Access Request under GDPR for access to their full records. This can be a printed copy of all or part of their record or online access to their full record. The Practice no longer has the right to charge a fee for providing the information.

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 for personal access
- Appendix B for proxy access

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.

At the point of application the patient will be provided with an information leaflet (Appendix C)

Eligibility criteria for online access:

Any adult patient over the age of 16 will be able to have their own online access account; (Patients over the age of 16 are deemed competent to manage their own account. Should you require access then the patient will need to complete a consent form.

Parents/guardians will be able to have an online access account for their children under the age of 11; (Proxy access - Proxy access allows parents, family members, carers, care home staff, to have access to their patients' online services accounts, in order to book appointments, request repeat medication and where applicable, view their medical record)

Young people do have the right to consult us without an adult being present. Whilst we would normally encourage them to speak about any health issues they may have with a parent or guardian, where a young person has sufficient understanding of the consequences of their decisions we will respect their right to confidentiality.

For this reason, we will turn off parental /guardian access to online services when a young person turns 11 years of age. A young person may reapply when they are 16 years of age.

Formal carers may be given access to patients' online accounts, where adequate consent is given by the patient;

Parties possessing lasting power of attorney for health for a particular patient may apply to access that patient's online account when they are unable to manage this themselves.

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 in adhering to information security guidelines. There are two options for identification verification including:

Documentation

As is current practice, should there be a request for online access; photo documentation must be provided as evidence of identity. Acceptable documents include passports, photo driving licences.

If you are making a proxy access application to access the medical records of a child we will need to see evidence of parental responsibility.

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 GP or Practice Manager.

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

- The nature of those checks
- Who did them and when
- Completed application 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

Appendix – Acceptable identity evidence based on the requirements of GPG45, the options for presentation of documents are as follows:

Two pieces of Level 3 evidence; or

One piece of Level 3 evidence and one piece of Level 2 evidence In either case,

One piece of evidence must include a photograph

Level 2 Identity Evidence	Level 3 Identity Evidence
Firearm Certificate	<ul style="list-style-type: none"> • Passports that comply with ICAO 9303 (Machine Readable Travel Documents) • EEA/EU Government issued identity cards that comply with Council Regulation (EC) No 2252/2004
DBS Enhanced Disclosure Certificate	Northern Ireland Voters Card
HMG issued convention travel document	US passport card
HMG issued stateless person document	Retail bank/credit union/building society current account
HMG issued certificate of travel	Student loan account
HMG issued certificate of identity	Bank credit account (credit card)
Birth certificate	Non-bank credit account (including credit/store/charge cards)
Adoption certificate	Buy to let mortgage account
UK asylum seekers Application Registration Card (ARC)	Digital tachograph card
Unsecured personal loan account (excluding pay day loans)	Armed Forces ID card
National 60+ bus pass	Proof of age card issued under the Proof of Age Standards Scheme (containing a unique reference number)
An education certificate gained from an educational institution regulated or administered by a Public Authority (e.g. GCSE, GCE, A Level, O Level)	Secured loan account (including hire purchase)
An education certificate gained from a well recognised higher educational institution	Mortgage account
Residential property rental or purchase agreement)	EEA/EU full driving licences that comply with European Directive 2006/126/EC

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Proof of age card issued under the Proof of Age Standards Scheme (without a unique reference number)	
Police warrant card	
Freedom pass	
Marriage certificate	
Fire brigade ID card	
Non bank savings account	
Mobile telephone contract account	
Buildings insurance	
Contents insurance	
Vehicle insurance	

Timescales

Practice Admin Team staff will be able to grant access to patients, who present with the correct identification, for appointments and medication on request.

If a patient requests access to their detailed coded information their record will have to be reviewed by a member of the admin team and it may be necessary for them to consult with the patient's GP to grant access. Consequently requests may take up to 14 days and in some circumstances may take longer.

In line with GDPR requests for online access to full records submitted as a Subject Access Request (SAR) will be completed within one calendar month.

Considerations/Approval of Access

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

On receipt of an application the patient's records will be reviewed by a member of the admin team who is trained in summarising. They will be responsible for checking if patients are on certain registers eg. learning difficulties register, child protection register, mental health register or have been identified as a possible victim/perpetrator of domestic abuse. Admin staff will consult with the patients usual GP if required before access is granted /denied.

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. If the child requests access to their record a competency assessment will be carried out by the GP. 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 may apply for access but will be registered as a proxy user.

Proxy Access

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

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.
- When a patient over the age of 16 has been assessed and is deemed not to have the mental capacity to make a decision on granting access to their carer or next of kin.

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 information 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

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 (Appendix A). This will be considered within the Practice and granted if deemed appropriate, normally within 14 days.

Patient online 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 GDPR. Patients submitting an SAR can choose to have online access to their full medical record instead of printed copies.

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At any point the Practice can revoke Online Access to patients if the functionality is abused.

Appointments

- We offer a minimum of 25% of GP appointments online this includes routine and 48 hour appointments.

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 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

Prescriptions can be ordered online on a 28 day cycle.

Sensitive consultations / information

Any information of a sensitive nature may be highlighted as confidential and hidden from the online view.

All domestic abuse consultations 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.

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.

During the online access registration process, patients will be issued with an leaflet (Appendix C) in which they are notified that their medical record may contain information that is historical, and therefore forgotten, not relevant to themselves, 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.

Promoting Patient Online

The Practice will promote the Patient Online Access service to all patients using a number of methods which will include:

- Display of posters within patient waiting area
- Practice website
- Practice newsletter
- Verbally with individual and groups of patients

Things to consider

<i>Forgotten history</i>	There may be something you have forgotten about in your record that you might find upsetting.
<i>Abnormal results or bad news</i>	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.
<i>Choosing to share your information with</i>	It's up to you whether or not you share your

<i>someone</i>	information with others – perhaps family members or carers. It’s your choice, but also your responsibility to keep the information safe and secure.
<i>Coercion</i>	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.
<i>Misunderstood information</i>	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 Practice for a clearer explanation.
<i>Information about someone else</i>	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.

ONLINE ACCESS TERMS AND CONDITIONS

1. The applicant’s identity will need to be verified by providing two identifying documents, at least one of which should carry a photograph of the individual. Documents accepted for this process are listed in the Appendix. In exceptional cases it may be possible to proceed without ID where the registering patient is very well known to the staff member vouching for them, but this should not be assumed.
2. The service is provided solely for the use of the registered person i.e. the patient, their parent/guardian, carer or power of attorney.
3. Appointments booked using this service must only be booked for the registered patient. Appointments for relatives/friends must be booked using their own credentials.
4. This service can be used to book single 10 minute appointments with the GPs. If you are unsure as to whether it is appropriate to see a doctor, or if a longer appointment is required please contact us by telephone during normal surgery hours.
5. If you need an appointment with a Practice Nurse or Health Care Assistant please contact us by telephone during normal surgery hours (these appointments are of variable length and must be carefully fitted to requirements).
6. Access to the service is provided on the condition that appointments are kept and that the service is not abused in anyway. Repeated failure to attend or cancellation of appointments at short notice will result in withdrawal of the service.
7. Prescriptions that are requested must be collected within 4 weeks. Prescriptions that are not collected within this time scale will be destroyed.
8. To reduce medicines wastage, please only request required prescription items.
9. Passwords/logon credentials should be kept secret. Do not pass on the details of passwords to anyone else.
10. It is the registered user’s responsibility to protect any information that may be displayed on screen or downloaded using this service. Sharing this information with any third party is at the user’s risk.

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11. If you think anyone knows your password or that your account has been accessed without your consent, you must contact the surgery at the first opportunity so that we can suspend your access to the system and provide you with new user credentials.
12. If you access any information through this system about anyone other than yourself or users for whom you are an authorised proxy you must log out and contact the practice as soon as possible to rectify any security breach.
13. The practice cannot guarantee that the online service will be continuously available and cannot accept responsibility for the consequences of any interruption in service provision.
14. Failure to comply with any of the above conditions will result in revocation of access to the service.