

CASTLEGATE AND DERWENT SURGERY

Patient Online Access Policy

DOCUMENT CONTROL

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List of Stakeholders who have reviewed the document	
Name:- PPG members S Hughes-Rudd	Title:- Practice Manager

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SUMMARY

This policy sets out the practices aims for how it will use Patient Online. It has been reviewed and updated to add further information relating to queries and issues raised by partners and patients since the introduction of the policy.

INTRODUCTION

This policy for patient online sets out how the practice will use the facilities and what patients can expect. The practice is committed to involving its patients to help improve its services and facilities.

The GMS regulations 2015/16 state that practices must promote and offer the registered patients the facility to view their detailed coded record. This is to include all information that is held on the practice's clinical system which is held in coded form unless any of the following apply:-

- In the considered opinion of the Practice, access to such information would not be in the patient's best interest because it is likely to cause serious harm to:-
 - the patient's physical or mental health, or
 - the physical or mental health of any other person
- The information includes a reference to any third party who has not consented to its disclosure
- The information in the GP medical record contains a free text entry and it is not possible under the contractor's computerised clinical systems to separate that free text entry from other information in the record which is held in coded data form.

Patients continue to have the right to submit a Subject Access Request (SAR) under the Data Protection Act 1998. However, as this differs from detailed coded records access the patient must submit this request in writing to the practice. Patient Services will either supply the appropriate application form or guide the patient to information in a printed form, although patients accessing their detailed coded records online are able to copy and paste and print information from the screen at no cost.

APPLICABILITY

This policy is applicable to all patients registered with the Practice and for all employees.

REGISTRATION FOR PATIENT ONLINE

Patients can apply for access to Patient Online either online via the surgery's website or at the surgery by requesting a registration letter. When visiting the surgery you will be presented with the following useful information:-

Patients have the option to access the following services:-

- Book and cancel appointments
- Order your repeat prescription
- View your medical records
- Update your contact details
- Send the practice a secure message

It is important patients read the information available either on the practice's website or provided as part of the pack to understand the risks involved where patients are requesting access to view their medical record. It is important patients are aware of their responsibility to maintain safety and security of the information in their record.

PRACTICE POLICY

Castlegate and Derwent Surgery currently makes the following aspects of patient records available to patients through EMIS patient online:-

- Current medication
- Immunisation
- Allergies
- Documents
- Test results
- Problems

At this point, we have not made access to consultations available; however this may be reviewed at a later time. This is because we feel there is too greater risk of patients misinterpreting information which is written by health professionals within their record.

It is important when signing up for patient online that each patient's identity is verified before allowing any access. Therefore the patient must present in person, and show the receptionist the required identification:

- a passport or driving licence (photo id)
- one other form of address identification - bank statement, tax statement or utility bill less than 3 months old

The receptionist will

- verify that the photograph is recognisably the patient
- verify the name, date of birth and address matches the patient record

Alternatively, a doctor who has been dealing with your care on an ongoing basis can vouch for you and verify your identify.

The receptionist can then switch on the relevant access immediately.

Consderations/Approval

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

Under 16's

Parents and guardians of children under 11 years of age may request limited on-line access for their children in order to:-

- book appointments
- order repeat medication
- View allergies, immunisations, problems and test results

Detailed coded record access will be limited for safeguarding reasons.

Receptionists need to be alert to potential issues around who has parental authority, and if, in any doubt defer to the doctor or practice manager. When someone requests online access to a child's record, it is essential to establish that they have parental responsibility and right of access to the child's record. **Their identity must be verified.**

When a child reaches their 11th birthday proxy access will be switched off, although the practice will notify the parents either in writing or via email around a month in advance that this will happen.

Patients over 11 and under 16 represent a difficult area, at some point the child is likely to become competent to make a choice about who has access to their medical record. It is recognised that it may be in the child's best interests for their parent(s) or legal guardian to have proxy access beyond the age of 11, especially if they have long term conditions. Therefore the decision for the practice to allow access must be made on a case by case basis after careful assessment of the young person's competence and best interests. Where proxy access is granted this will be regularly reviewed with the young person.

Access will only be granted to book appointments and order prescriptions.

When a young person reaches the age of 16 they are deemed competent to make an informed choice about access to their medical information and therefore any proxy access will be switched off, again notification will be issued. At this point the young person should apply for their own access.

Patients Lacking Capacity

It may be in the patient's best interest to allow proxy access to a patient's record where the patient lacks capacity, again this will be on a case by case basis and the decision can only be following discussion with the GP.

Legitimate reasons for the practice to authorise proxy access without patient's consent include:-

The patient has been assessed as lacking capacity to make a decision on granting proxy access and

- A. the applicant has a lasting power of attorney for health and welfare registered with the Office of the Public Guardian
- B. the applicant is acting as a Court Appointed Deputy on behalf of the patient, or
- C. the GP considers it to be in the patient's interest in accordance with the Mental Capacity Act 2005 code of practice

When an adult patient has been assessed as lacking capacity access will only be granted to book appointments and order prescriptions.

Where proxy access has been enabled on behalf of an adult patient who lacks capacity, this should be reviewed should there be a change in capacity resulting in the patient re-acquiring capacity.

Patients with Carers

Although we recognise that it may be helpful for someone else to be able to have online access to a patient's records, for example a family member, close friend or carer, the practice feels that the risk of breaching patient confidentiality is too high and therefore access will not be granted.

We strongly recommend that patients do not pass on their passwords to carers or anyone else.

Removing Access

The practice reserves the right to remove access to Patient Online should there be evidence of misuse, to include persistent booking of appointments and non-attendance,

Appointments

This practice will allow a patient to pre-book online appointments in advance with GP's face to face and telephone, nurses and healthcare assistants. We ask that patients read the advice available for the correct booking category of appointments.

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

- Practice will issue an initial warning letter
- If the action continues the practice will suspend access for 2 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.

If you have any concerns about this policy please contact the practice to discuss.