

DR INGRAM & PARTNERS

7 & 8 Park Street

Access to Online Services

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1. Online Services offered by the Practice

It is the aim of the practice to provide, safe and secure online services, in-line with the GP Systems of Choice (GPSoC) NHS England guidelines and data protection legislation, ensuring that services are easily accessible and user friendly to enable patients and the practice to achieve maximum benefit.

The practice can provide three levels of online access;

- a) Standard access providing appointment functionality which can be provided as soon as the application form is completed and identification has been verified.
- b) Standard access providing repeat medication functionality which can be provided as soon as the application form is completed and identification has been verified.
- c) Enhanced access providing appointment and repeat medication functionality with additional access to coded data from within the record. The practice requires the patient to request enhanced access and the record must be reviewed by an authorised person prior to access being granted

Online services are accessible via an application form obtainable through reception.

The practice reserves the right to refuse online services access or, restrict access to certain parts of the record if

- a) in the reasonable opinion of the practice, access to such information would not be in the patient's best interests because it is likely to cause serious harm to
 - (i) The patient's physical or mental health
 - (ii) The physical or mental health of any other person
- b) the information includes reference to any third party who has not consented to its disclosure; or
- c) the information in the patient's medical record contains free text entry and it is not possible under the practice's computerised clinical systems to separate that free text entry from other information in that medical record which is held in coded form.

The practice reserves the right to revoke access to online services if the patient uses the services inappropriately or there is a suspected breach of security.

2. Availability of Online Services

The surgery will provide online services to patients as detailed below:

Age of Patient	Services offered
18 years and over	<p>Online Access to appointments as soon as the application has been processed and identification verified.</p> <p>Online access to repeat prescriptions, as soon as the application has been processed and identification verified.</p> <p>Enhanced Online Access – access to their detailed medical record, once the application has been processed, identification verified and the additional authorisation process has been completed.</p>
18 years and over (Proxy Access)	<p>Standard Online Access Only - access to appointments and repeat prescriptions, as soon as the application has been processed and identification verified.</p>
16 to 18 years	<p>Standard Online Access - access to appointments and repeat prescriptions, as soon as the application has been processed and identification verified, and where the patient can demonstrate the required level of competence deemed necessary to use the services appropriately and understand their responsibilities in respect of the online services, as set out in the patient information leaflet.</p> <p>Enhanced Online Access – access to their detailed medical record, once the application has been processed, identification verified, competence verified and the additional authorisation process has been completed.</p>
11 to 16 years	<p>The practice does not offer online services to patients aged between 11 and 16 years. NHS England recommend that practices adopt a very cautious approach to allowing parents' access to their child's medical record once the child reaches the age of 11, especially in light of the extended access to medical records in 2015.</p> <p>Children vary in the age at which they are able to make an independent and informed decision about who should have access to their record. The surgery has decided to adopt the most practical approach and withdraw parents' access as soon as the child reaches 11 unless there are exceptional circumstances.</p>
11 to 16 years (Proxy Access)	<p>The practice recognises that in exceptional circumstances it may be a requirement for a parent/carer to have proxy access to a child's record after the age of 11 years. Each case will be assessed on an individual basis by the GP Partners who will decide if proxy access is to be authorised.</p> <p>If proxy access is granted it will be for standard online access only - access to appointments and repeat prescriptions, as soon as the application has been processed and identification verified.</p>

	<p>From 11-16 a parent with proxy access will be able to manage certain elements of the young person's record, such as demographic data, and make appointments and order repeat prescriptions, but they will not be able to see the young person's past appointments or clinical record, although they will still be able to see the current repeat prescription record. On the 16th birthday the system will switch off all the remaining proxy access except where the young person is competent and has given explicit consent to the access.</p> <p>A young person may decide at a point, once they are mature enough to act autonomously, to request access themselves.</p>
0 to10 years (Proxy Access only)	Standard Online Access - access to appointments and repeat prescriptions, as soon as the application has been processed and identification verified.

3. Application for Online Services

The practice will accept applications from patients or proxy's for online services via the following means:

- a) Completion of a paper application form (See Appendix C), this can be completed when the patient initially registers with the practice or at any time while they are registered with the practice.
- b) Completion of the online application form (See Appendix D), accessible from the surgery website.

Identity verification is required before online service applications can be processed. The practice will endeavour to process applications for standard services as quickly as possible and once identity has been verified the patient will be provided with their user credentials within 5 working days.

The practice requires 20 working days to process access to coded and detailed medical records to allow for the GP/authorised person data checks to be completed.

Note: The practice requires that the patient / proxy provide proof of identity on collection of user credentials. User credentials will not be released without this.

4. Identity Verification

Identity verification protects both patients and the practice from the consequences of fraudulent, accidental, or otherwise unauthorised access. To ensure that the practice can demonstrate that it meets its common law and statutory duties, we have implemented robust identity verification procedures that are applied consistently when processing applications for online services.

The verification checks are used to establish that the identity of the applicant for online services matches that of the individual registering with or registered at the practice and recorded on the GP system.

At the point of application the practice will verify identity using one of the methods detailed below:

- 1) Documentation – Any two of the following three documents are acceptable: passport, driving license, bank statement. (Alternatives should be checked against the government approved list of acceptable documents.)
- 2) Vouching by a staff member – An authorised member of staff who knows the patient well can verify/vouch for them.
- 3) Vouching with confirmation of information – patients can answer questions about the content of their record; this should be done at a planned appointment.

The practice also applies the verification methods detailed above when checking the identities of proxies who, with due authorisation may hold accounts allowing access to services on behalf of other patients. Please see section 5 for further details relating to proxy access.

Note: Application for online services could be completed at the same time as a new patient registration. If this is the case, please ensure identification is verified with the appropriate documentation above. If the patient cannot provide identification documents, they can be registered as a patient with the practice but the application for online services cannot be completed until further verification has been completed.

5. Proxy Access

The practice will accept applications for proxy access to online services, from individuals who are authorised to act on behalf of the patient for example the patient's parent or carer.

It is recognised by the practice that patients may choose to share their account credentials with family, friends and carers (including a care home). The practice will provide advice during the application process to advise of the risks associated with doing this. Proxy access is the recommended alternative to sharing login details.

The practice will only provide standard online services with proxy access accounts, therefore only appointment administration and repeat medication requests will be available via this facility. If a proxy requires access to detailed medical records, the request will be made in writing and referred to the GP Partners for assessment/authorisation.

Identity verification will form part of the proxy application and the practice will complete Identity verification as per the details in section 4 of this policy.

If a request for proxy access is received for a known vulnerable patient, it will be referred directly to Dr Rhonwen Bramley, Safeguarding Lead or Dr Jo Pears, Caldicott Guardian who will have a conversation with the patient or refer to the patient's usual GP if more appropriate.

The practice has the right to refuse or remove proxy access if a GP or other member of staff suspects that the patient has been or is being coerced. After speaking with the patient if the practice feels that there is still good grounds for suspicion proxy access will not be authorised or if it is already in place it will be withdrawn.

The practice will not grant proxy access in other circumstances, after discussion with the patient, if:

- (i) Practice staff members believe a patient aged less than 16 years is competent to make a decision on access but that child has not given consent for proxy access to the person who is seeking it.
- (ii) There is a risk to the security of the patient's record by the person being considered for proxy access.
- (iii) The patient has previously expressed the wish not to grant proxy access to specific individuals should they lose capacity, either permanently or temporarily; this should be recorded in the patient's record.
- (iv) The patient's GP judges that it is not in the best interests of the patient.

6. Coercion and Safeguarding

'Coercion' is commonly defined as 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 has safeguarding and coercion policies in place related to paper-based and face-to-face services. But online services provide new and additional opportunities for coercive behaviour.

The practice will discuss the issue of coercion with patients, and ensure that they understand and accept the risks before an application for access to detailed medical records is processed.

If a GP, or other member of the practice team has any suspicions that a patient is being coerced, or a known vulnerable patient applies for online access to their medical records, then that patient will not be registered for online records access, and the case will be referred to Dr Rhonwen Bramley, Safeguarding Lead or Dr Jo Pears, Caldicott Guardian who will have a conversation with the patient or refer to the patient's usual GP if more appropriate.

7. Park Street Surgery – Online Services – Patient Responsibilities

The practice recognises that Patients need to be clearly informed of, and formally acknowledge, the limits of the organisation's responsibility, and their responsibilities to keep their information secure. To assist with this the practice provides written details of patient responsibilities on the paper application form and a copy is also provided to every user at the time that they collect their user credentials.

The patient's responsibilities, in relation to online services, are also clearly displayed on the information boards throughout the practice in the Reception and waiting areas.

Patients who apply for access to, and use the online services, do so on the understanding that they understand and agree to the responsibilities set out below:

1. Patients **MUST** read and understand the information leaflet provided by the practice.
2. Patients are responsible for the security of the information that they see or download.
3. If patients choose to share information with anyone else, they do so at their own risk.
4. If patients suspect that their account has been accessed by someone else without their agreement they **MUST** contact the practice as soon as possible.
5. If a patient sees information in their record that is not about them or is inaccurate they **MUST** contact the practice as soon as possible
6. If a patient feels they are at risk of being pressured into revealing details from their patient record to someone else against their will, it is best that they do not register for access at this time, or if they have already registered and are being coerced contact the practice as soon as possible.

8. Online Account Support

Once access has been authorised and user credentials issued to the patient/proxy, they will have the facility to update / maintain their account online including updating their password if they forget it. The password reset facility will only function if the patient/proxy has supplied the practice with their email address and the email address has been verified on the clinical system.

If the patient is unable to reset their password online they must contact the practice who will be able to do this for them subject to identity verification checks. Once the practice staff have completed the necessary identity checks the user id will be emailed or text to the address or phone number that is linked to the account and has been previously verified.

If the patient/proxy has forgotten their User ID they will need to contact the practice by telephone or in person. Once the practice staff have completed the necessary identity checks the user id will be emailed or text to the address or phone number that is linked to the account and has been previously verified.

If the patient/proxy has forgotten both their User ID and Password they will need to contact the practice by telephone or in person. Once the practice staff have completed the necessary identity checks the user id will be provided to them and the associated password will be emailed or text to the address or phone number that is linked to the account and has been previously verified.

The practice will never provide both User ID and Passwords together in one email or text.

The information used to verify identity is detailed in Appendix E. If the patient/proxy is unable to provide accurate answers for the identity questions or the practice suspects that there is a safeguarding/coercion issue, the user credentials will not be reset and the patient/proxy will be required to come to the practice with photographic ID to complete the process and if required the case will be referred to Dr Rhonwen Bramley, Safeguarding Lead or Dr Jo Pears, Caldicott Guardian.

9. Staff Training

The practice will ensure that staff receive the required training and information to support this policy and demonstrate an appropriate level of awareness of the potential risks associated with access to online medical records.

10. Access to EMIS

Although EMIS Access uses high levels of internet security to protect your personal information, we do not warrant the service to be 100% secure and in using the service you are accepting a degree of risk.

EMIS Access is generally available 24 hours a day, but at certain times, for example when our computer system is backing up data or undergoing maintenance, you may be unable to use the service for a while. 7 & 8 Park Street does not guarantee that EMIS Access or our other online facilities will always be available and will not accept any liability for damages resulting directly or indirectly from the use of, or from any inability to use, EMIS Access or our other online facilities. EMIS have incorporated a "Current Status of EMIS Access" link to the front screen of the EMIS Access Web site. You may click on this link at any time to be redirected to a page showing the current status of the service. This page is updated at regular intervals and will display any operational problems and when they are due to be fixed.

EMIS Access is provided by EMIS, a trading name of Egton Medical Information Systems, the company that provides our patient records system. 7 & 8 Park Street cannot accept liability for damages resulting, directly or indirectly, from the use or misuse of the EMIS Access service. In using EMIS Access, you agree to the terms and conditions and privacy statement on the EMIS Access website.