

Safeguarding: Accelerating patient access to their records

GP Forum

Benefits of online access

- Improved transparency of records, including factual robustness
- Increased patient involvement in their own health/ treatment plans, sharing responsibility
- Patients being better informed of health conditions and more timely access to health information
- Potential reduction of clinical appointments to gain information

The GMS contractual requirements



Year	Requirement
2015	<u>Promote and offer facility to access online the information held in coded form</u>
2019	<u>Offer all patients online access to all prospective data on the patient record unless exceptional circumstances apply.</u>
2019	<u>Full record access upon written request</u>

How people access their records

NHS^x



digi.me



livi



There are others...

Key principles and points

- Accelerated patient record access programme follow GP Contractual requirements for online record access 2019: *“All patients will have online access to their full record... as the default position from April 2020 ... subject to existing safeguards for vulnerable groups and third-party confidentiality and system functionality” Source: GMS Contract 2019-2024 commitment 5.10*
- Current change- Anyone with a patient facing app will be able to view PROSPECTIVE data from 1st November. This includes full text of consultations, documents in full, results, appointment information and codes,
- There are no changes to proxy access provision
- Online access to medical records for majority of patients will be beneficial. Patients will be better empowered and enabled to understand their health conditions, monitor their health and reflect on medical advice.
- To write consultations and correspondence with patient in mind
- For a small number of patients online access can pose safety issues in situations where patient lack capacity to decide, and in situations of deliberate abuse/coercion and control
- A number of patients will not want automatic access to their records
- The ‘hide from online visibility’ tools are lost via the GP2GP

Patient online access to their records

Safeguarding considerations necessary with this provision.

The particular concerns, which is not exhaustive, surround:

- Risk of coercion in domestic abuse relationships, and risk of sharing information against a person's will.
- Active child protection/adult at risk concerns
- Third party access- consider for patients whose reading and writing skills are limited or language barriers
- Patient lacking capacity to decide about sharing information/record access

Alongside this our medical notes need to serve as a tool where we can safely record safeguarding information.

Safeguarding:
What should
be hidden
(redacted)
from online
access?

Consider what impact it would have if the patient viewed this information on their record.

- Child Safeguarding Information / Child Protection Conference Minutes
- Child protection plans
- Adoption files
- Looked After Child information
- Adult Safeguarding Information
- At risk of abuse
- Domestic violence
- Sensitive data
- Third Party Information

Hiding consultations from the online record

(Redaction)



The screenshot displays the EMIS software interface. At the top, there is a navigation bar with tabs for Summary, Consultations, Medication, Problems, Investigations, Care History, Diary, and Documents. Below this is a toolbar with icons for Save, Next Problem, Cancel, Clear, Confidentiality, Sharing, Online Visibility, Run Template, and Book Appointment. The main area shows a consultation record for a patient named TEST, Emis (Dr) at GP Surgery, EMISWebCR1 50003, dated 22-Sep-2017 07:26. The 'Online Visibility' dropdown menu is open, showing two options: 'Display on the patient's online care record' (selected) and 'Do not display on the patient's online care record'. Below the menu, there is a section for 'Referrals - 1' and 'Medicine Management'. At the bottom, there is a section for 'Active' and 'Consultation' with a list item '1. <No Problem>'. The interface is framed by a torn paper effect.

Caution: Hiding information from online visibility WILL NOT redact records when printed

Hiding parts of care record from the online record

Term	Value	Con
Adverse reactions	Adverse reactions (25-Jan-2016)	Attach
Operations, procedures, sites	Operations, procedures, sites (25-Jan-2016)	Attac
Adverse reaction to penicillins		Proble
Ischaemic heart disease		Proble
Final tetanus immunisation		Immi
Asthma		oble
Backache, unspecified		oble
Administration		Attach
Occupations		Attach
Ischaemic heart disease screen		Proble
Preferred method of contact: n		
Serum TSH level	0.30 - 4.40) Euthyroid picture (including satisfactory thyroxine replacement)	Invest
CHOL/HDL RATIO	FATS/Health Hearts guidelines for interpretation of lipids	

- Edit
- Delete
- Confidentiality ▶
- Online visibility ▶**
 - Display on the patient's online care record
 - Do not display on the patient's online care record**
- Copy to Local Record
- Graphical Trend
- Tabular Trend
- Audit Trail
- Knowledge

Who has EMIS access? – allied colleagues entering information onto the GP records need to be made aware




System Tools



Practices using EMIS can override individual patient settings, disabling features in EMAS Manager



Click , System Tools, and then click EMAS Manager.



Practices can enable/disable transactional services such as appointments and repeat prescriptions.









'Enhanced SNOMED codes' to trigger record review

Detailed coded record

Use detailed coded record settings

Detailed coded record will allow you to choose which services the online user can use.






Services

- Allergies (Mandatory)
- Medication (Mandatory)
- Laboratory test results
 - Display free text from: 01-Apr-2020 
- Documents
 - Only show documents from: Enter a date 
 - Display free text from: Enter a date 
- Immunisations
- Problems
 - Display free text from: Enter a date 
- Consultations
 - Only show consultations from: 01-Apr-2020 
 - Display free text from: 01-Apr-2020 

Ribbon Icons

Patient précis icons

The following icons are visible in the patient demographic ribbon to highlight status

Online Services user status		
Icon	Colour	Status
	Black	Not registered
	Amber	Active
		Inactive
	Green	Live
Proxy status		
	Black	No linked proxy users
	Green	Has 1 (or more) linked proxy users

Docman-Patient Visibility Function

Active	BARRY, Angela (Miss)	Born	19-Sep-1974 (46y)	Gender	Female	NHS No.	751 973 4528
		Usual GP	HARDING, Brian (Dr)				
Date Navigator		Date	Consultation Text				
020 (1)		24-Sep-2020	Docman				
Sep (1)			Additional [Provisional] Attachment Admin Letter Insurance				
24th: [DME2020] Docman			Administration				

Tasks

WEST, Mark (Mr)

Inbox 22

Search Inbox

Review added, Neurology document for FARMER, Stevan (Mr) NHS No: 8380928467
21-Oct-2020 - Dr Paul Devenan
[Active] [High] Due 08-Oct-2020

1

Review: Clinical Letter, Orthopaedics document for WEST, Mark (Mr) NHS No: 6861754462
21-Oct-2020 - Dr Paul Devenan
[Active]

Decision Required for Patient Visibility via Online Services

Review: Out of Hours, General Medicine document for WEST, Mark (Mr) NHS No: 6861754462
21-Oct-2020 - Dr Paul Devenan
[Active]

Review: Out of Hours, General Medicine document for WEST, Mark (Mr) NHS No: 6861754462
21-Oct-2020 - Dr Paul Devenan
[Active]

2 week wait

Leeds General Infirmary
Great George Street
Leeds
West Yorkshire
LS1 3EX

Tel: (0113) 2432799

Department of Orthopaedics
Clinic Date: 20/03/2014
Typed: 21/03/2014

Patient Name: Miss Minnie Mouse
DOB: 01/05/1991
NHS No: 9434765919

Docman Desktop App | 21 Westfield Moor, Morley, Leeds, West Yorkshire, LS27 8DO

Dr Paul Devenan (All Features) - Emis Test

NHS No. 686 175 4462 from 16-Jun-1930 (90y)

Usual GP Dr Emis Test

Actions

- Show Activity
- View in Emis Web
- Annotate
- Quick Steps
- URRN
- Add Task
- Create New Task
- Add Comment
- Free Text
- More Actions
- View Documents
- Add Clinical Codes
- Start Discussion
- Print
- Email
- Create Merge Letter
- Workflow Tracker Report

2

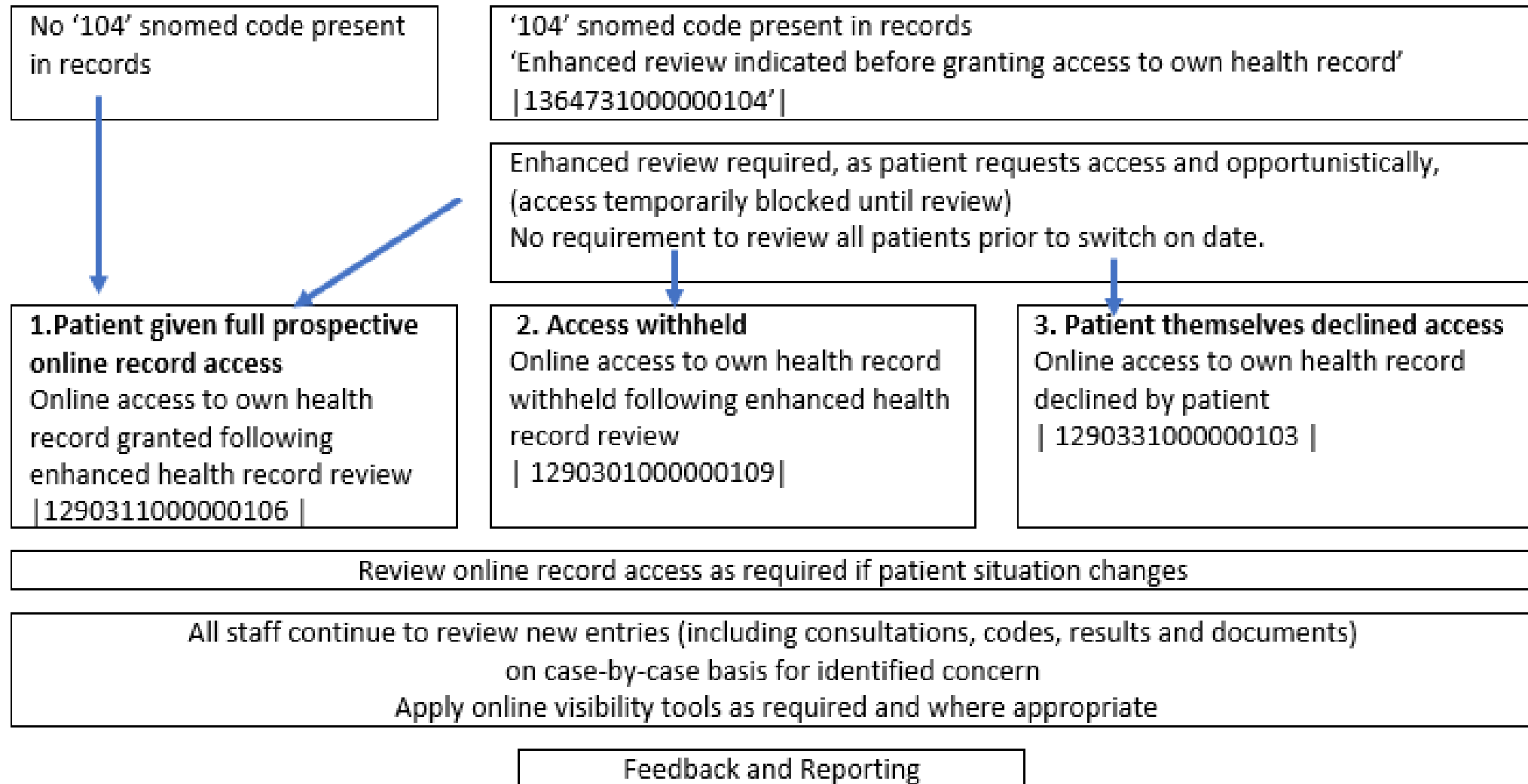
Online Services

- Allow viewing of this document
- Prevent viewing of this document

New Enhanced Review SNOMED Codes

- Practice identification of patients to exclude from automatic switch-on due to concerns about potential risk of harm,
- Practices required to have process for identification of patient who may be risk of harm or have factors which may impact mental capacity to decide to have online access and keep records safe.
- Searches available to import
- Review and adapt codes included as per practice coding processes and patient population. Review search parameters e.g. whether to include rule for past-ended problems within a decided time frame as per practice processes.
- The practice remains the data controller in terms of 'enhanced review indicated' cohort.
- Enhanced review code applied following search to identify patient prior to November 1st Switch on date
- Legal advice was sought about all of these options and all can be legally justified to need a review.

New Enhanced Review SNOMED Codes



Proxy access- Age Maturity Notification

Gender	Male	OS	PROXY
Usual GP	HARDING, Brian (Dr)		

There is 1
linked
proxy
user

Individual/s acting on behalf of a patient may request access to a patient's online account:

- Parents or Guardians
 - Carers
 - People with Power of Attorney
 - Friends or family with the patient's consent
 - Care or Nursing Homes with the patient's consent
-
- Child Proxy Access- Email sent by emis
 - 3 months before 11th birthday
 - On patient's 11th birthday

<https://www.emisnow.com/>

Online service guides

Pitfalls

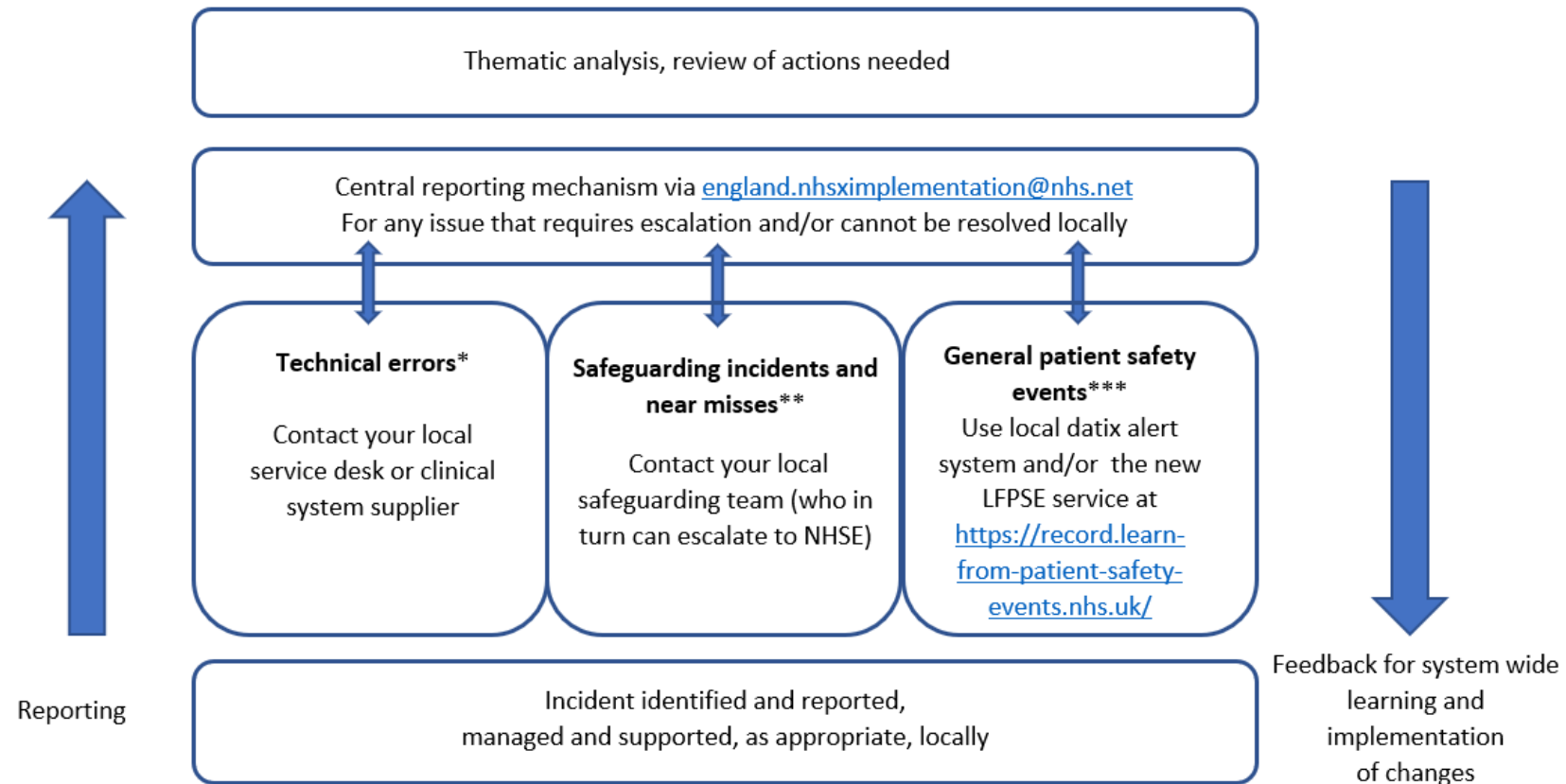
- Medications
- Patient who currently have online access denied
- Self populating referral forms
- 'Secondary consultations'
- Prospective assess resets when patient moved GP
 - Previous record may have had items hidden from online visibility
- Suggestion to search for '104' code upon registration

Checklist

All practice staff:

- are aware of upcoming changes to patient online access to their medical records
- have good understanding of the 'hide from online visibility' tools in EMIS, both in terms of how and when to use, include consultation entries, codes and filing documents with incorporation into relevant practice policies and processes.
- have good understanding of patients for whom online access to medical records may pose safety concerns and therefore rare instance where access may need to be declined on a temporary or long-term basis
- Practice has adapted and run an 'enhanced review indicated before granting access to own health records' search to identify safeguarding, mental capacity and severe mental health case of patient concern and applied code in advance of go live date.
- Practice verified that no third-party providers are auto-filing into patient medical records, if identified to contact your local IT team urgently

Feedback and Escalation



* System not functioning as expected

** A vulnerable adult coming to harm, or near miss, as a result of accelerated access

***Patients coming to harm, or potential for harm, poor outcomes, future risks

Accelerating Citizen's Access to GP Records

Resources

- NNNGP brief guide- distributed today

NHS Digital:

- [Access to patient records through the NHS App - NHS Digital](#)

Information Governance Guidance

- [Amending patient and service user records - NHS Transformation Directorate \(nhsx.nhs.uk\)](#)
- [Access to patient records through the NHS App - NHS Transformation Directorate \(nhsx.nhs.uk\)](#)
- [GP practice readiness checklist - NHS Digital](#)
- <https://digital.nhs.uk/services/nhs-app/nhs-app-guidance-for-gp-practices/set-up-a-test-patient>
Contact for practices to set up dummy patients, with an NHS number, therefore can set up an online account and test visibility with consultations, document etc.
- [Record Access Webinars - Implementation Team - FutureNHS Collaboration Platform](#)
- [Resources to support staff with providing record access to patients - NHS Digital](#)
 - Films and YouTube videos to support general practice staff