



## **Patient Online**

### **Frequently asked question – For practices**

**Update November 2015**

This is a live document and we will regularly update these FAQs.

For comments or feedback, contact us at [england.patient-online@nhs.net](mailto:england.patient-online@nhs.net).

## Why do I have to provide access to Patient Online services?

The 2014-15 General Medical Services contract and Personal Medical Services agreement introduced the requirement that all practices were to make available and promote Patient Online services to their patients. This included:

- Booking appointments
- Ordering repeat prescriptions
- Viewing summary information from their GP record

More importantly, research has shown that patients who are actively involved in their own care have improved outcomes and better medicine compliance. The GMS/PMS 2015-16 regulations extend this requirement for patients to view all the detailed coded information in their GP record. Full details of this requirement can be found [here](#).

## When do I have to provide online access to patient records by?

You should already be offering patients online access to summary information, which is medications, allergies and adverse reactions. The GMS/PMS regulations for 2015 require practices to also provide patients with access to detailed coded information in their record. This should be done as soon as your system supplier provides the appropriate functionality and no later than 31 March 2016. NHS England is working with the Health and Social Care Information Centre (HSCIC) and the system suppliers to ensure that the requirement is met as soon as possible. Some suppliers already offer this functionality.

## Where can I find advice and guidance?

The Patient Online team has produced 'How to Guides' with practical information:

- Patient Online: registering patients for GP online services
- Patient Online: offering patient access to detailed online records
- Patient Online: making the most of online appointments and repeat prescriptions

The Patient Online team can also offer support and advice. To find out who your local lead is please email [england.patient-onlinepmo@nhs.net](mailto:england.patient-onlinepmo@nhs.net).

NHS England has also been working with the [Royal College of General Practitioners](#) and other partners to develop guidance and resources to help practices. Further guidance is being added this year which will support the implementation of detailed coded records.

## How will I provide access to patient records?

Most practices have already provided patients with access to their summary information so will be familiar with the clinical system settings for online services. Each clinical system will differ in the way that they offer detailed coded records access. Your clinical system supplier or CSU/HIS will provide the necessary training and guides and advise you when the functionality is available. Your Patient Online implementation lead will also offer support through regular meetings such as practice manager forums.

## Do I have to provide access to historical information for patients?

Once detailed coded records have been enabled at your practice, patients who have requested access to detailed coded records will be able to view all of the information that is coded in their GP record. There is no option to provide this from a set date. The only exclusions to providing patients with access to their detail coded information are as stated in the GMS/PMS regulations:

Patient to access online all information from the patient's GP record which is held in coded form unless—

**(a)** in the reasonable opinion of the contractor, 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, or
- (ii) the physical or mental health of any other person;

**(b)** the information includes a reference to any third party who has not consented to its disclosure; or

**(c)** the information in the patient's GP 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 that medical record which is held in coded form.”

Read more about [General Medical Services \(GMS\)](#) and [Personal Medical Services \(PMS\)](#) regulations.

## How do I prevent access to records for vulnerable patients?

Access to records is agreed on a case by case basis. Where it is clear that access should not be provided as this would not be in the best interest of the patient, then the GP should explain that they will not give access and the reasons for this to the patient or their advocate. The GMS contract is clear in this respect. Please see the response to the question above for more detail on the GMS contract exclusions.

## How do I cancel access if I have a concern about patient safety?

It is possible to turn off patient access for individual patients. If at all possible it is advisable to discuss this with the patient prior to revoking their access. You will need to review the setting for the patient. Your supplier will be able to provide any technical guidance required.

## How much more work will my practice have to undertake to offer patients access to their detailed coded record?

Most practices that are offering full records access tell us that there was an initial increase in workload until the practice staff were familiar with the process but this reduced over time and patient demand for face to face contact reduces as they can better support themselves. Enabling detailed coded records access at a practice level only requires the system settings to be switched on. See the supplier websites for more details [EMIS](#), [INPS](#), [Microtest Evolution](#) and [TPP](#).

Once the system has been enabled, it is recommended to invite a small group of patients e.g. from the PPG, or those you see regularly perhaps with a long-term condition), to access their detailed coded record, which will enable you to assess what impact this has on workload and amend any processes if required.

## **What support is available to practices offering online access to records?**

NHS England in conjunction with the Royal College of General Practitioners (RCGP) has developed guidance which is available on [their website](#).

We will be posting regular updates on the web page of the NHS England website: <http://www.england.nhs.uk/patient-online>

## **How can GP system suppliers help?**

GP system suppliers will provide their practices with information about their release schedule, including advice on any steps that need to be completed to setup online access to detailed coded information.

## **What are the information governance and Data Protection Act 1998 rules about sharing a whole electronic record with a patient?**

In order not to contravene the Data Protection Act 1998 with an unauthorised disclosure of personal information, the practice must take steps to ensure that the person who is requesting access to a GP record or other online service is entitled to it.

More information on identity verification can be found in Patient Online: registering patients for GP online services. Patients who have access to these services also have a responsibility to keep them safe and secure by not sharing passwords or leaving screens visible to others. When requesting these services patients should complete and sign a form which highlights their responsibilities. The form and other information for patients can be found on here.

The RCGP guidance can be accessed [here](#).

## **What are my responsibilities for patient access to records as a) Caldicott Guardian/Information Governance lead; and b) Data Controller?**

As a Data Controller or Caldicott Guardian you must ensure that the highest practical standards and processes are implemented and maintained for any personal data under your control. Guidance and support materials that have been developed for Patient Online services will provide you with practical examples to enable you to meet these high standards.

More information can be found in the [RCGP guidance](#).

## **How do I protect myself from any risk that the information made available to patients is subsequently misused?**

The patients are responsible for any information that they download, print or share with others. The [example patient registration form](#) and [information leaflet](#) advises patients of their responsibilities.

To support practices, information for patients is included in the [RCGP guidance](#).

## What are the policies, guidance or controls for providing carers and/or guardians with access to information online?

Giving others access to online services on behalf of another patient is referred to as proxy access.

The practice needs to decide whether to provide proxy access and if so in which circumstances. For example, proxy access could be given to parents/carers for children under the age of 11 years, help them manage appointments and order repeat prescriptions.

Guidance for proxy access has been developed with the RCGP and can be found [here](#).

## Are practices operating under the Personal Medical Services agreement (PMS) obliged to offer the same online services as General Medical Services contract (GMS) practices?

NHS England is committed to fair and equitable funding for all GP practices delivering core services, regardless of contract type.

PMS is a locally agreed contract that largely mirrors national GMS contract. Where PMS agreements deliver essential services to a list of patients, there are many core national requirements that apply and draw from consistent regulatory approach across GMS, PMS or APMS (Alternative Provider Medical Services) contracts. The Patient Online contractual changes are a must do and the wording in PMS agreement is the same as that in the GMS contract.

## What will my patients see in their online records?

The information that patients will see depends on the level of online access that they are provided with. The 2014-15 GMS contract required patients to have access to summary information. The 2015-16 GMS contract extends this, to sharing with patients all the information which is held in coded form in their record.

Below is the coded data set that GP practices are required to display.

For clarity – all this coded data will be from the day GP records started i.e no 'date from' option. Some of the information in the list will depend on what your clinical system is able to routinely display.



Demographic



Immunisations



Procedure codes  
(medical or surgical)  
and codes in consultation  
(signs, symptoms)



Allergies/adverse  
reactions



Results  
(numerical values  
and normal range)



Codes showing referral  
made or letters received  
(no attachments)



Medication  
(dose, quantity and  
last issued date)



Values (BP, PERF)



Problems/diagnoses



Other codes  
(ethnicity, QOF)

Each of the clinical system suppliers will display this information to patients differently. We suggest that you create a test patient on your system and give this patient access to detailed coded information to see what will be displayed to your patients.

## **What is the policy for online access by children?**

Practices need to agree and document their policy for online access by children. All staff need to be aware of the policy so that it is applied consistently.

For patients under 16 years of age, a Gillick or Fraser competence test would need to be undertaken. The GP must assess whether the patient understands the implications and responsibilities of having access to their record prior to giving access and that this would be in the best interest of the patient.

More information can be found in the [RCGP guidance](#).

## **Can I deny access to a record?**

Online access to medical records, or any other online service, can be denied if the GP believes that it is not in the patient's best interest to have access. This could be because you suspect that the patient is at risk of being coerced into sharing their information, or any other circumstance that the GP is aware of, which might put the patient or their information at risk. This should be discussed with the patient prior to denying them access.

## **Do we need to get consent of consultants before sharing their letters with patients?**

If the letter is a direct contact about the care and treatment of a patient following a referral, or the patient already has a copy of the consultant's letter then consent is not required.

Letters that contain names of others who are not directly involved in the patient's care and treatment (third parties) must not be shared without the consent of the third party.

## **Who provides support to patients with technical issues?**

The four main GP system suppliers offer help to patients who are having technical issues with online services. Patients should be encouraged to follow instructions on the login screen, as the exact procedures depend on the system they are using.

## **Will the supplier contact us to say they have enabled the software or do we have to do something ourselves?**

Each supplier will use their usual way of updating their systems for enhancements or fixes to roll out and update Patient Online functionality. In most cases system messages will be sent to let you know that a change is planned and what the practice needs to do, if anything, either before or after the update is added to the system.

If you are unsure about any updates please contact your system supplier helpline for further advice.

If you have any other questions, please get in touch with your implementation lead or contact us at [england.patient-online@nhs.net](mailto:england.patient-online@nhs.net).