Safeguarding
Related to Online Services

Coercion and Proxy Access

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Today’s objectives

Consider safeguarding concerns related to patients using online services

- Coercion
- Proxy access
- Child proxy access
- Safeguarding advice
- Helpful Resources
Coercion

Definition:

“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”
Considering Coercion

• Implication for online services

By gaining access to a person’s record and abuser may gain further control or escalate harm

• Does the practice policy on safeguarding need updating to cover patient online services?

• Registering patients for online services requires awareness of the potential impact of coercion

• The risks for coercion of patients with online access should always be borne in mind
What practices should consider

• Question a new patient applying for access
• Check the patient’s notes for information:
  ✷ That may indicate previous or ingoing abuse
  ✷ That may lead to harm if seen by a malicious third party
• If there are any indications of coercion or abuse:
  ✷ Consider refusing online access
  ✷ Data redaction or restricted access may allow safe access
Explanation to patients

- If access is refused or restricted or data redacted, record it in the patient’s notes and explain it to patient.
- Offer the patient an appointment with the GP to discuss the decision.
- The GP would explain why they consider it is in the patients’ **best interests** not to have access, or to have restricted access.
- Patients should be involved in this decision provided they can understand the risks and are not being coerced.
- Discuss giving the other person formal proxy access.
Proxy Access

**Definition:**

“Proxy - a person authorized to act on behalf of another or the authority to represent someone else”
Proxy access

• Someone who has proxy access normally does so with the informed consent of the patient
  ✦ *Formal* proxy access – the proxy has their own second set of login details
  ✦ *Informal* proxy access – the patient shares their login details with another person

• The practice may refuse or withdraw formal proxy access, if they judge that it is in the patient’s best interests to do so

• Formal proxy access may be restricted to less access than the patient has, e.g. appointments and repeat prescriptions only
Proxy access – without consent

• Practice may authorise proxy access without the patient's consent when:
  ✩ the patient does not have capacity to make a decision on giving proxy access
  ✩ the applicant has a lasting power of attorney (welfare)
  ✩ the applicant is acting as a Court Appointed Deputy on behalf of the patient
  ✩ the GP considers it to be in the patient’s best interest

• The person authorising access has responsibility to ensure that the level of access enabled is appropriate for the performance of the applicant’s duties
Proxy access – procedure

• Establish:
  ✩ proxy access is justified – consent or best interests
  ✩ level of access the proxy should have

• Verify the identity of the patient requesting proxy access AND individual who will be proxy

• The patient must complete the proxy access consent form

• Check the record for data that should be redacted

• Record in the patient’s notes:
  ✩ identity of the practice person authorising access
  ✩ level of access given to the proxy
Child Proxy Access

Milestones
11th and 16th birthdays
Child proxy access

• For most families parental proxy access on behalf of their children under 12 is appropriate and helpful

• Between their 11\textsuperscript{th} and 16\textsuperscript{th} birthday most children will become competent to make the decision about whether anyone should have proxy access for them

• People aged 16 or above are assumed to be competent to make an independent and informed decision

• Practice systems should automatically switch off proxy access at the 11\textsuperscript{th} birthday

• Case-by-case decisions about proxy access can be made later
Child proxy access – procedure

- Verify the identity of the person asking for proxy access
- Establish that they have parental responsibility for the child
- Check the record and/or practice team knowledge of risk of abuse
- Refuse access if there is doubt about the safety of the decision
- Continue to have a high level of suspicion of abuse where child proxy access has been enabled
- Consider redacting any data that may suggest a suspicion of abuse
Help and Support
Where to get help and support?

- System suppliers
- RCGP: guidance, practical tools and e-learning modules
- NHS England national support centre:
  - Case studies
  - Frequently asked questions
  - Contact details for Implementation Leads and Digital Clinical Champions
  - Materials for patients
  - Email help line
Links

- [https://www.england.nhs.uk/patient-online](https://www.england.nhs.uk/patient-online)
- [http://elearning.rcgp.org.uk/patientonline](http://elearning.rcgp.org.uk/patientonline)
- Email: [england.patient-online@nhs.net](mailto:england.patient-online@nhs.net)

Direct link to resource guide