

Safeguarding Related to Online Services

Coercion and Proxy Access

February 2016

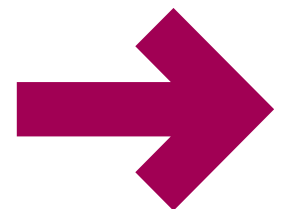


Today's objectives

Consider safeguarding concerns related to patients using online services

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

- Helpful Resources



Coercion

Definition:

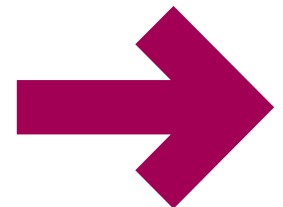
“Coercion’ is the act of governing the actions of another by force or by threat, in order to overwhelm and compel that individual to act against their will”

Considering Coercion

- **Implication for online services**

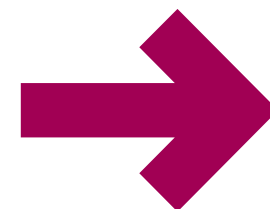
By gaining access to a person's record and abuser may gain further control or escalate harm

- 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 ongoing 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



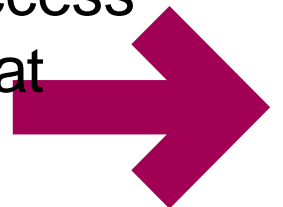
Proxy Access

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



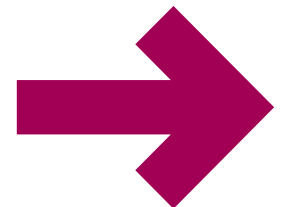
Child proxy access

- For most families parental proxy access on behalf of their children under 12 is appropriate and helpful
- Between their 11th and 16th 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 11th 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

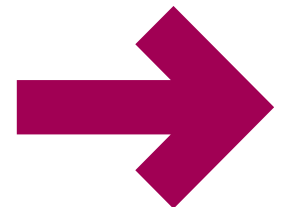


Help and Support



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>
- <http://elearning.rcgp.org.uk/patientonline>
- Email: england.patient-online@nhs.net



Direct link to resource guide

<https://www.england.nhs.uk/wp-content/uploads/2015/11/po-support-resources-guide.pdf>

