

# Safeguarding Related to Online Services

## Coercion and Proxy Access

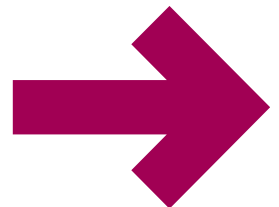
February 2016



# Today's objectives

Consider safeguarding concerns related to patients using online services

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



# Coercion

## Definition:

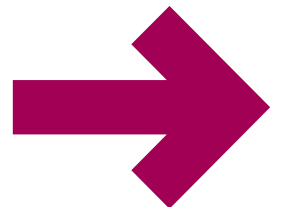
*“Coercion’ is the act of governing the actions of another by force or by threat, in order to overwhelm and compel that individual to act against their will”*

# Considering Coercion

- **Implication for online services**

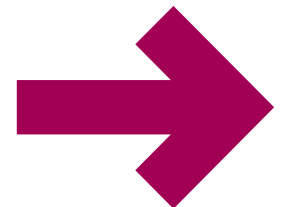
By gaining access to a person's record and abuser may gain further control or escalate harm

- 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



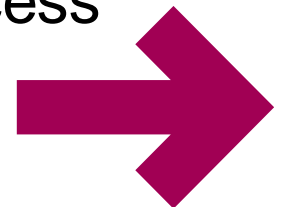
# What practices should consider

- 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 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**

11<sup>th</sup> and 16<sup>th</sup>  
birthdays



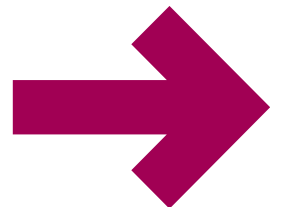
# Child proxy access

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

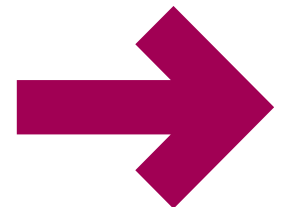


# Help and Support



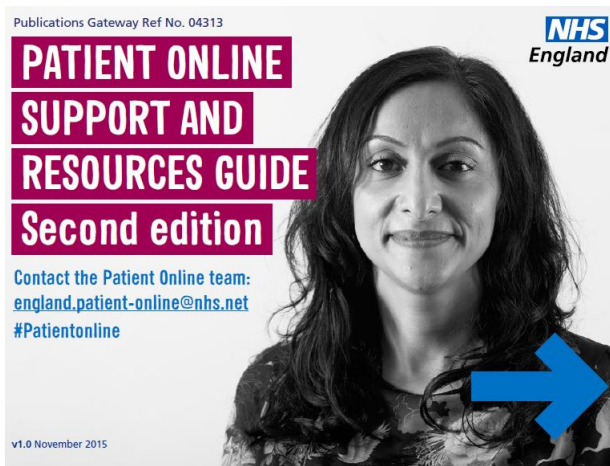
# Where to get help and support?

- 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](mailto: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>

