**Patient on-line access to full clinical record**

**31.10.23**

Until 31.10.23 we have operated an **opt-in process** where if a patient wanted access to their prospective full clinical on-line record, they needed to apply for it and were required to complete a consent form. This consent form highlighted some of the potential drawbacks/dangers of access to the full clinical record (which includes the consultation notes, results, medication, outgoing referral letters and incoming clinic letters). We did this so our patients were making an informed decision to proceed.

In certain situations, an Enhanced review of the records (and in some cases discussion with a clinician) is needed before on-line access is granted such as:

* Patients who for various health related reasons ***may*** lack the capacity to keep their information safe and so be at risk of being forced to share their health information or unwittingly doing so e.g. Health conditions such as Dementia ,Stroke, Severe Depression
* Patients where reading their medical record ***could*** trigger severe negative emotions such as suicidal ideation.
* Patients who have been identified as suffering Domestic Abuse and ***may*** be at risk of being coerced into sharing their medical record which in turn ***could*** increase their level of risk.
* Patients where there are Safeguarding concerns such as Children on Child Protection Plans, Adults where there are Safeguarding concerns.
* Patients who are Looked After (fostered) where the information included in the records could be distressing.

For these situations a specific read code (referred to as the 104 code) is added to the record which then triggers the enhanced review of the medical record prior to on-line access to the clinical record being granted.

**From 31.10.23 NHS England have mandated that the process changes to an** **opt-out process**. **What this means is that every patient who has the NHS App/NHS website/other healthcare app account, will have automatic access to their full prospective clinical record unless they have specifically informed the practice that they do not want it (in this case a 103 code is added to prevent the access) or where a 104 code has been added for one of the reasons listed above.**

While many of the risks identified above can be mitigated through staff training and redaction of sensitive material there are residual risks that we cannot mitigate/reduce, particularly relating to patients suffering Domestic Abuse who we are not aware of, and these concerns are shared by the BMA and many Domestic Abuse agencies and Safeguarding professionals. Click [here](https://refuge.org.uk/news/joint-letter-on-concerns-around-survivors-medical-records-on-nhs-app/) for the statement.

**If you are concerned that on-line access will put you at risk, then you can either contact us to decline access or close your NHS App/other healthcare provider account.**

NB. These changes will not affect existing online access or proxy access (where a parent/carer has access to another individual’s record)

**Drs Barnes Kerai and Patel**