

BEST PRACTICE GUIDELINES – CONSENT AND CONFIDENTIALITY

Introduction

GP surgeries and other NHS healthcare organisations are ultimately responsible for how they deal with patient consent and confidentiality. Consideration of these issues and the adoption of processes that allow organisations to deal with patient consent is an important aspect of launching new SMS services.

It is generally considered that text messaging is an expansion of mobile communication and essentially fulfils the same administrative role as (posted) letters, emails or telephone calls to patients. Furthermore, it is considered reasonable to assume that if a patient has provided a contact telephone number (landline or mobile), then they will not object to being contacted on that number (either by call or text message).

The following ‘best practice’ guidelines which each organisation may or may not choose to follow (in full or in part) have been developed by us in conjunction with over 1,200 healthcare organisations that have launched the iPLATO Patient Care Messaging service. The guidelines advocate an ‘informed implied consent’ model for the majority of patients which is entirely consistent with all available direct and indirect guidance on the issue of patient consent to SMS services generally.

Recommended ‘Best Practice’ Guidelines

A. *Welcome Message to All Patients*

All patients should be sent an introductory message advising them of the ‘new’ SMS service. This ‘informs’ all existing patients with a mobile number about the service and provides an opportunity to ‘Opt Out’ before commencement, if so desired. This also has the ancillary benefit of ‘cleansing’ the existing database records of invalid or expired mobile numbers.

The recommended introductory message and procedures vary slightly for patients who have a “duplicate” mobile number registered on their record. That is patients whose mobile number also appears in the record of another patient.

i. Patients on System with “Unique” Mobile Number (Existing Patients)

All these patients should be sent an introductory message advising them of the ‘new’ SMS service and providing an opportunity to ‘Opt Out’ of the service if they wish. Common template messages are provided by iPLATO although surgeries may of course choose to modify the message as they see fit.

ii. Patients on System with “Duplicate” Mobile Number (Existing Patients, shared number)

This occurs most typically when parents fill in their mobile number for their children when registering at the GP. Data entry errors can also lead to this anomaly.

- A modified ‘welcome message’ is sent to this group of patients. This message asks patients to confirm their identity (by reply with name and birth date) and then to confirm which patients should be registered against this number. Common template messages can be provided by iPLATO. NOTE: surgeries may wish to consider alternative methods of identity confirmation in the event that they do not wish to ask patients to supply personal details by text.
- After sending the ‘welcome message’ the surgery should consider ‘Opting out’ all these patients from the service.
- Surgeries will then ‘Opt-in’ these duplicate number patients when they respond confirming that they should be on that number (or their identity is confirmed by the surgery). Any patient with an unconfirmed identity will remain ‘Opted out’.

iii. Other Considerations

Surgeries may wish to consider adding additional information in the welcome message. Some examples that have been used by surgeries include:

- Providing the surgery landline number and asking patients to call the surgery rather than replying by text.
- Asking patients to advise if they no longer live in the area.
- Reminding patients that they should consider using a Pin number on their phone to protect against unauthorised access to the device.

B. New or Modified Patients (Enrolled after service launch)

After service launch the practice staff should make a defined effort to advise patients that if supplying their mobile number to the surgery then it may be used to contact them via SMS. If consent is given then the mobile number is collected and stored (Read Code 9NdP can also be used).

If consent is withheld the mobile number is not collected.

C. General System Usage

i. Sensitive Data

Use professional reasoning and judgement when contacting patients by SMS. Withhold personal information that is unnecessary to the meaning of a message and avoid sending text messages that could be embarrassing or distressing to the intended recipient.

ii. Use of Opt-out Functionality

The iPLATO service contains a simple facility to 'Opt-out' a patient from receiving any SMS messages from the system. Any patient requests to 'Opt-out' should be actioned immediately.

iii. Updating Patient Records

All users of the iPLATO system receive regular automated reports of all Expired and Failed Numbers which allows the surgeries to update their patient records in a timely fashion.

Surgeries should ensure that systematic and regular procedures and process are in place to collect, update & maintain patient contact details, particularly mobile numbers.

D. On-going Promotion of Service

After service launch the practice should ensure a pro-active approach to publicising the existence and benefits of the service to patients. Patient awareness is a valuable tool in ensuring rapid uptake of the service. It also provides patients with the on-going choice to 'Opt-out' of the service at any time.

The following are all practical examples of different methods of publicising the service by the surgery.

- Waiting room posters (actual posters available from iPLATO).
- Waiting room patient leaflets; contact information registration and update forms (templates available from iPLATO).
- Notification messages on general and specific surgery correspondence i.e. prescriptions and general letters to patients (messages can be inserted into document headers and footers).
- News releases for local media and practice newsletters (templates available from iPLATO).
- Information on surgery web-site.
- Use of iPLATO mSite (available to all surgeries FREE).
- Communication with various patient groups and organisations eg local LINK and PPG groups.

See examples on following page: Contact iPLATO at support@iplato.net or call 020 3178-4675 to request or learn more.

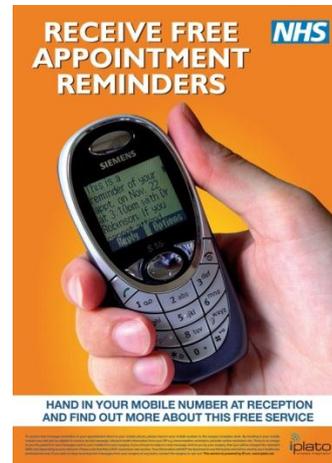
Use of iPLATO mSite

- Surgery specific smartphone portal
- Customisable from User login screen on the iPLATO service
- FREE to all surgeries



Waiting Room Posters

- Size A3
- Posted to surgery on request



Waiting Room Patient Leaflets

- Size A4
- 4 pages
- Templates provided in Word format
- Customisation and printing by the surgery



News Releases - Service Launch

- Templates available
- Ideal for:
 - Local media
 - Practice newsletters
 - Surgery website
 - Social media

