

30th November 2020

Dear BSW Member Practices,

Hopefully you are all aware of the COVID-19 – Notice under regulation 3 (4) of the Health Service Control of Patient Information (COPI) Regulations 2002, issued 20 March 2020 and recently extended until 31 March 2021.

The COPI Notice allows you to share patient personal data with all other healthcare providers as long as it's in direct relation to COVID-19, either directly or via an intermediate system, without any additional data sharing or processing agreements being required.

To help support patients during the pandemic, a number of new systems and clinical services have been introduced that rely on the automated sharing of patient personal data from within your clinical systems. Direct access to your patients' clinical records is required to provide direct and, in some cases, immediate care to your patients when they are seen by other providers.

From a data protection legislation point of view, the sharing of your patients' clinical records within SystmOne and EMIS to other clinical systems and healthcare providers is perfectly legal and legitimate. Sharing your patients' clinical records in this manner is also in line with the 7th Caldicott principle – The duty to share information can be as important as the duty to protect patient confidentiality.

Without access to your patients' clinical records being setup, other providers may not be able to fully support your patients if they present in response to COVID-19 or some COVID-19 clinical services such as the new Oximetry at Home service may not be available to them.

Please can you check your current sharing configuration of your SystmOne unit as shown below and action accordingly. Please could you send bryan.taylor@nhs.net a quick email to confirm you have checked and amended as necessary. Please note we have been advised by the DPO service that the TPP sharing setting to override "implied dissent" can be ticked within the sharing options.

Any patient who has explicitly dissented (potentially via SystmOnline) cannot be change without the individual first confirming they have changed their mind and thus we would recommend that practices re check with dissented patients wherever possible and especially before referring on to other services such as Covid @Home or if they are in a care home that you are not the lead GP practice for.

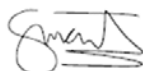
Information held in primary care systems can be key to managing patients. Sharing data can be critical to allow other professionals (eg Out of Hours, Community services, Secondary Care etc) to manage your patients safely and effectively. By turning this setting on at practice level (through SystmOne) information will be shared automatically.

Part of the BSW digital transformation programme is also focusing on the development of an Integrated Care Record (ICR) and the implementation of Population Health Management (PHM) tools including local Primary Care Datasets (PCD). The Data Sharing Agreements required to join these programmes have been developed with your Data Protection Officer and were recently sent to you by Andrew Girdher requesting that you sign up. The majority of practices have now done this but if you have not done so please prioritise this now. The direct care and PHM opportunities this will afford us will directly support our collective efforts over this winter. FAQs can be found here <https://www.bswccg.nhs.uk/your-health/integrated-care-record>. If you have any questions or concerns please contact Jason Young, Andrew Girdher or Shan Mantri.

Many thanks,



Dr Andrew Girdher
BSW CCG GB Chair



Dr Shanil Mantri
Chief Clinical
Information Officer



Jason Roberts
Data Protection Officer
BSW GP Practices



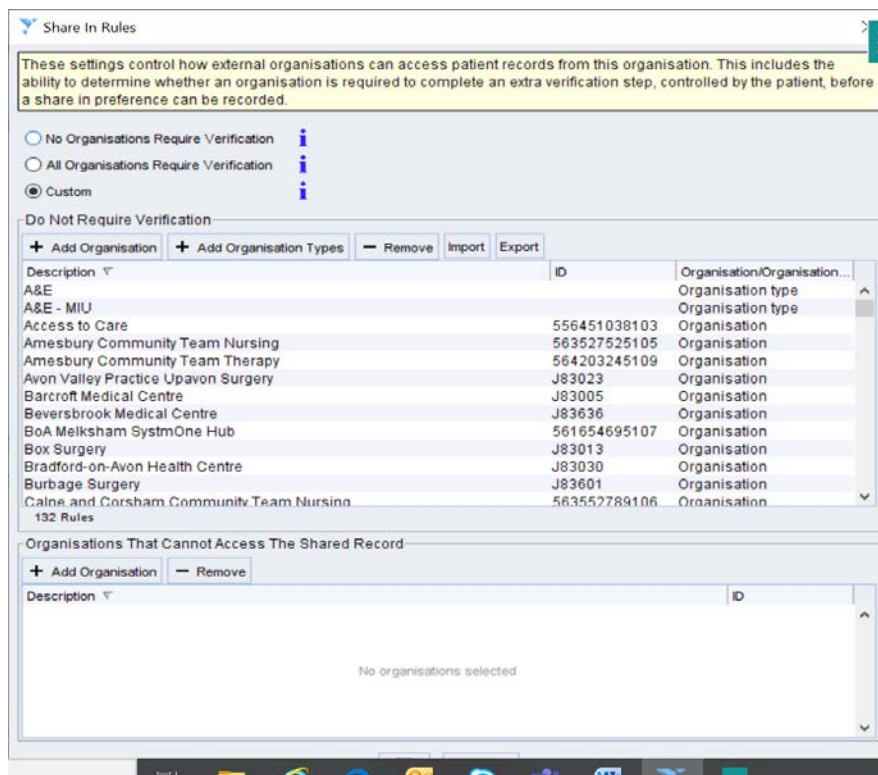
Dr Gareth Bryant
Wessex LMC

TPP SystemOne Patient Sharing EDSM configuration for COVID-19 – BSW CCG

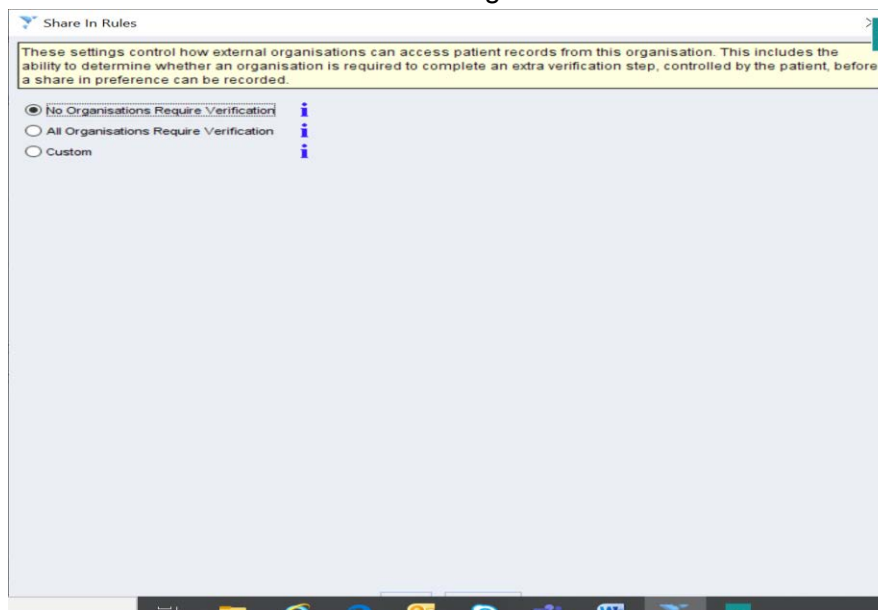
1. Share in rules

Please go to Setup >Users & Policy < Share in Rules..

Change your selection from Custom to No Organisations Require Verification



The above is probably what your system is currently configured to. Please click so it's the same as configuration shown below



2. Ensure your organisation preference for sharing is set to share in and out

This will capture any patient in the future that has no share preference set. Please note. This will not overwrite patients who have previously dissented to share or in the future opt out of sharing. It will only set the share preference for patients with no preference set.

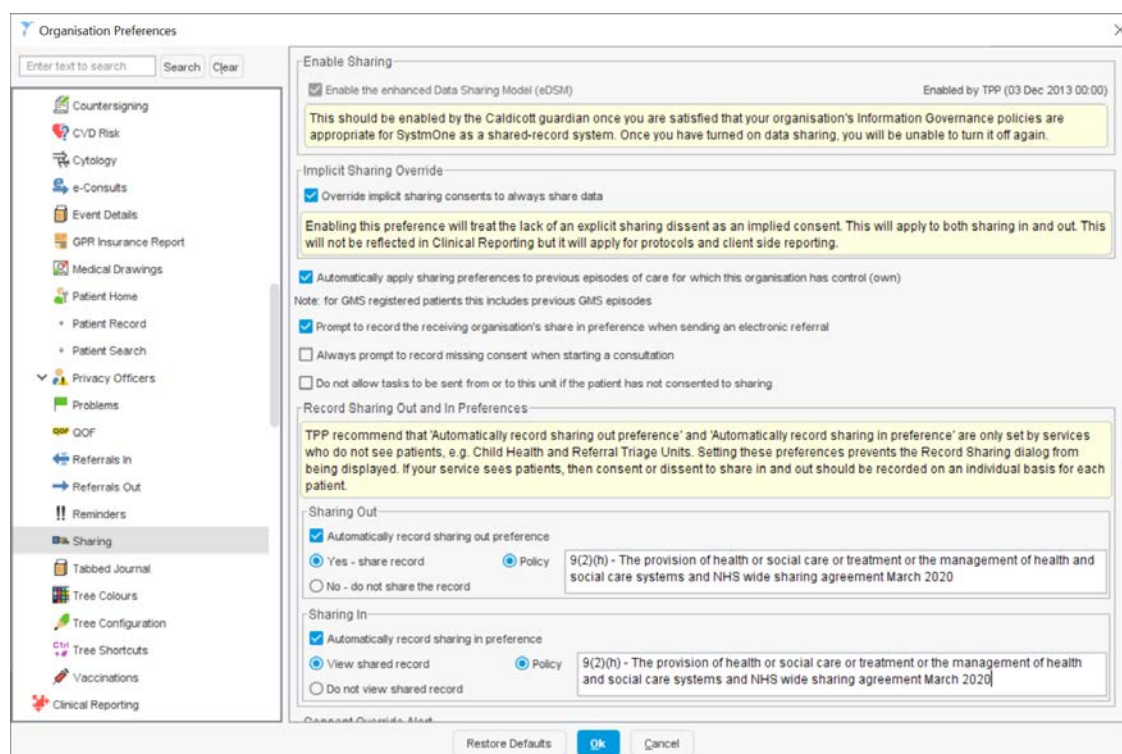
To configure go to Go to Setup < Users & Policy < Organisation Preferences < Clinical Policy < Sharing

Click on the automatically share in and out options and configure as below. See screenshot below.

The wording for the policy box is:-

9(2)(h) – the provision of health or social care or treatment or the management of health or social care systems and NHS Wide sharing agreement March 2020

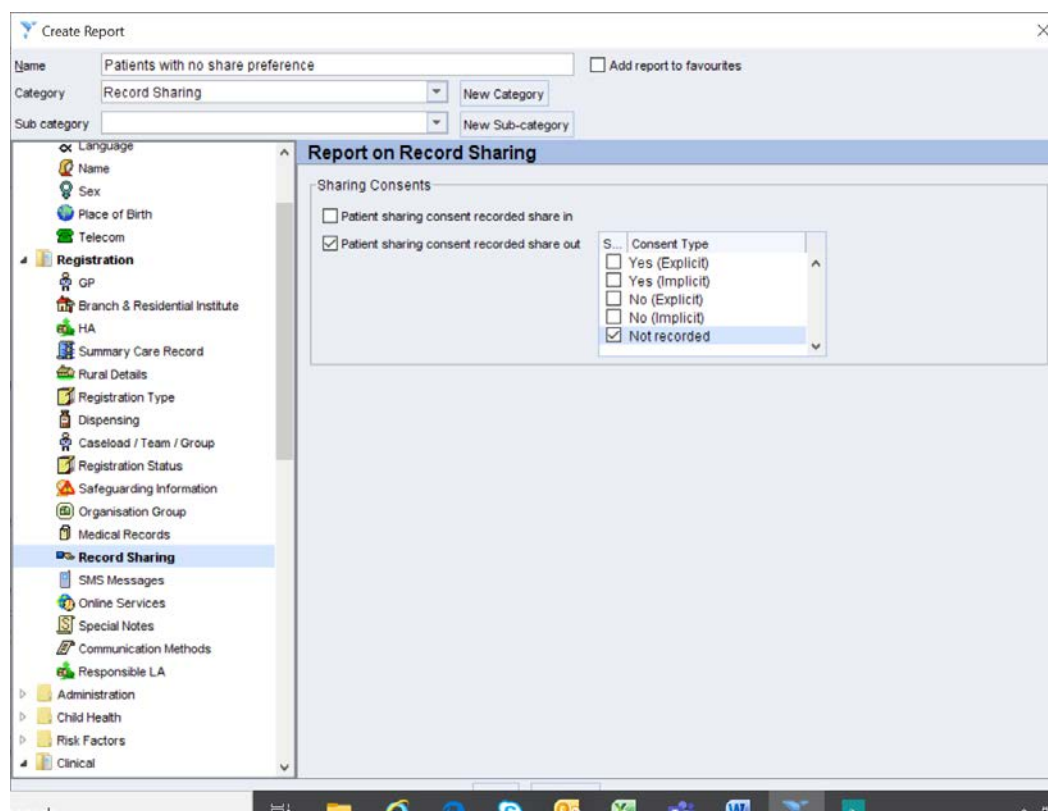
Also check the implicit override option is ticked. This will ensure that only patients with explicit dissent will be blocked from sharing



3. Run Clinical report to check for patients with no share preference set

By default Patients have no sharing preference set which means even if a patient agrees to a clinician in out of hours viewing their record; they will not be able to. To correct this we need to find all patients with no sharing preference set and update them to “implied consent for sharing in and out. Please note- this action will not override patients who have already expressly consented or dissented from being changed.

Create a new clinical report as shown in the screenshot below



Run the report. If you get Zero patients then you don't need to proceed any further as all your patients have a sharing preference set. If you do have patients in this report do the following:

1. Right click on report you have just run and choose > *Show Patients*
2. Choose the *All patients* Icon then right click on the selected patients and choose > *Actions > Update Record Sharing Preferences*. After around 30 seconds a pop up window shown below will appear. Click on Yes-Share record for both sharing In and Out and cut and paste the following text into the policy box for both sharing in and out like in the screenshot below:-

9(2)(h) – the provision of health or social care or treatment or the management of health or social care systems and NHS Wide sharing agreement March 2020



**Bath and North East Somerset,
Swindon and Wiltshire**
Clinical Commissioning Group

If you need any assistance or have any questions please contact Bryan Taylor
bryan.taylor@nhs.net 07789 933015.

Jason Roberts
Data Protection Officer
BSW GP Practices

Bryan Taylor
Clinical Systems Officer
BSW CCG