



Lancashire & Cumbria Consortium of Local Medical Committees

449-451 Garstang Road (Ambulance Service HQ), Broughton, Preston, PR3 5LN

Enquires@nwlmc.org

01772 863806

19th September 2023

Update for GP Practices RE NHSE's Accelerated Citizens' Access to Health Records programme

Lancashire and Cumbria Consortium of Local Medical Committees are aware that there are ongoing concerns and significant risks with the Accelerated Citizen's Access to records programme, which aims to enable patient access to prospective health data en masse. The risks which include clinical safety, workload issues and inadequate redaction software have not been mitigated. It has also been confirmed by Tristan Stanton, NHS England's programme Lead for the Accelerated Access to Records programme, that if a patient chooses to move to another practice, any redaction flags do not transfer over; although to mitigate this none of the data will be transferred. This issue is currently being looked at.

Enabling access to records en masse is not safe for the patients or the GPs. It needs to be done in a measured way, with each patient being considered on a case-by-case basis, in order to mitigate some of the associated risks. The serious harm test needs to be conducted and as stipulated by the ICO, this should be done by a clinician. The lack of time and resources in General Practice therefore continues to be one of the main risks, especially as we move into the challenging winter flu/ Covid-19 period.

You will know the deadline for this roll out has been pushed back multiple times following national outcry from practices and subsequent debate and legal counsel sought by BMA GPC. The current deadline of 31st October 2023 is very unlikely to change – the GP contractual requirement will become law from November 1st. **The LMC is currently looking to Lancashire and South Cumbria ICB and North East and North Cumbria ICB to support practices by acknowledging their concerns and providing recognition and concession to those who have not enabled access for all appropriate patients by the deadline of 31st October 2023.**

GP Data Controllers should not feel pressured by EMIS who are currently offering an opt in date of 20th September, with a view to enabling access by 4th October 2023.

Practices should start working towards enabling access for those patients where it is appropriate, in a safe, measured way. For ease of reference, we have included a list of the relevant snomed codes on the following page. Where a 104 code has been applied, patients will not be able to view their record until a review has been conducted and the 106, or 109 code has subsequently been added to the record. To be clear, Lancashire and Cumbria Consortium of LMCs absolutely supports enabling patients to access their health records, but it must be done safely.

The BMA GPC wrote to parliamentary under-secretary of state for health and social care, Neil O'Brien MP outlining the concerns expressed by GPs ahead of the upcoming switch-on of the government Accelerated Access to Records programme. As part of BMA GPC efforts to engage with government and support members, they will be producing guidance for GPs in the coming weeks and updating members as and when they meet with government to discuss this issue. We will keep you updated on their progress.

We urge practices to continue to use our [managing extreme workload pressures guidance](#) to limit contacts to 25 per day in order to prioritise safe patient care, within the present bounds of the GMS contract.

If you require any further information, please do not hesitate to [contact us](#).

Snomed codes:

104 code = 'pending approval' – not allowed access until been reviewed

106 code = checked and can have access

109 code = shouldn't have record – withheld after review

103 code = patient declined access to records