

## **PROTOCOL ADOPTION PROCESS**

The following protocol is an updated adaptation of the protocol originally provided courtesy of the Quarterjack Practice. This can be adapted depending upon your practice processes.

### **Introduction**

The adopted name is the only name to use on the front of the medical record envelope and in any communications. The pre-adoptive information should be regarded as strictly confidential. If there is a professional need to use this information, please take care on its disclosure.

### **Process for Administrative Staff**

- If an electronic deduction is received with reason 'Adopted child' – do not deduct until letter is received from NHS England (via PCSE) detailing deduction/reregistration instructions.
- Find the paper medical record and give to the Practice Manager or Named Practice Lead.
- The letter will arrive from PCSE via city sprint in a labelled bag. The letter will be marked 'attention of the Practice Manager, private and confidential'. Please give this to the Practice Manager or Named Practice Lead. The letter will give details of the new name and NHS number.

### **Process to be completed by senior member of staff i.e. Practice Manager or Named Lead**

- When letter received, deduct as instructed, close the patient, and process as send and receive.
- Re-register the patient using only the name given and the new NHS number.
- Do not save birth name, previous name or old NHS number.
- Follow any other instructions in the letter.
- A new medical record envelope will be issued shortly afterwards showing only the new details. A letter from the NHS Central Register will be stapled to the envelope. Any paper records must be transferred to the new envelope (ensuring previous name and nhs number are blanked out) – the old envelope must not be used with name/NHS number crossed out.
- Parents may bring the adoption certificate to the Practice, unaware that we receive these instructions. Please check if the change of name has already been actioned: if not, give a copy of the certificate to the Practice Manager to check that details arrive shortly. This copy must be shredded when NHS England letter is received.
- Stick a pre-printed label on the front of the medical record envelope marked 'Confidential patient data - take care on disclosure of information'

The following further actions to be completed need to be considered depending upon the practice clinical system functionality and the practice security & confidentiality policy. With the advent of the Lloyd George digitisation, practices will need to ensure robust processes for ensuring the highest level of security and confidentiality without relying on the use of the physical Lloyd George wallet to keep sensitive information in sealed envelopes (within the wallet) as may previously have been the case. See also the section below on **SARs requests – Beware** when considering how the practice deals with this sensitive information.

• **Enter 270456003 (Confidential patient data held) as heading on the clinical system record and free text ‘take care on disclosure of information.’**

• Depending upon the practice systems for levels of access and sensitivity, scan the letter from PCSE/NHS Central Register, under the above heading. Beware - the letter should be ‘hidden’ as sensitive information (to be viewed by doctors only). Any information within the letter should be coded appropriately, again, at the highest level of access/security.

• The level of access should be that the scanned letter cannot be opened or printed by any surgery staff, other than GPs and/or other individual with highest level access. This will need to be decided by the practice locally. However, there needs to be a process in place to ensure that any such sensitive data/correspondence is flagged to ensure its inclusion on transfer to a new GP surgery.

The PCSE/NHS Central Register letter advising of the adoption should then be disposed of in confidential waste, in line with the practice policy.

• Print any previously scanned documents, blank out the old name, old NHS number and any previous patient identifiable data (PID) and add the new name and new NHS number, delete from record and re-scan. Practices using iGPR or other similar software maybe able to make use of redaction at this point.

• It is essential that the medical information held within the e-records prior to the change in name and NHS number is captured and transferred to the new record. To ensure everything is captured and as an interim measure it is recommended that the medical summary of problems (past and active), drug history, immunisations, allergies etc is printed from the old record and added to the new record, both in a scanned format but also electronically added with the relevant clinical codes as soon as possible.

• Blank out old name and old NHS number from paper records, add new name and new NHS number, photocopy (labels could be peeled off) and add to Lloyd George. Shred originals.

• **Care** will need to be taken when transferring the notes via ‘GP2GP’, but the information will need to remain available for GP’s.

• **SARs requests – Beware**

The BMA “Access to Health Records” tells us under section 4.9

### **When should information not be disclosed?**

*The GDPR read together with the Data Protection Act 2018 provides for a number of exemptions in respect of information falling within the scope of a SAR. In summary, information can generally be treated as exempt from disclosure and should not be disclosed, if:*

*– in the case of children’s records, disclosure is prohibited by law, e.g. adoption records.*

It is therefore paramount on checking records that hold sensitive information. Such content will need to be redacted either in part or in whole. It may also be worth bearing this in mind when deciding how the practice will deal with any pre-adoptive documents that may be necessary for a clinician to be aware of in years to come but must not be disclosed if it reveals information about the adoption, unless of course the patient is aware of their adoption, and it is documented as such.