



TEXTING PATIENTS POLICY

Policy

The Practice will collect patient mobile telephone numbers as an alternative means of communication. This includes the assumed consent to send SMS messages. We manage this using an Opt-out process. Due to this, patients must be made aware that they should contact the Practice if they wish to change their consent. There is no requirement under GDPR to gather express consent from patients to communicate with them using details they have provided us. However, we must ensure that patients have a convenient way to express their communication preference and consent with us.

The text messaging facility will be advertised to patients using:

- Patient waiting room monitor displays
- Practice website, including a copy of the opt –out form (Appendix A)
- Practice quarterly newsletters, at least once a year.
- The registration form, giving the patient opportunity to opt-out
- Practice Social Media

Patients must be made aware that they should contact the practice if they change their mobile phone number. This will ensure there is no possibility of their confidentiality being breached.

AccuRx: There will be no facility for patients to respond to text messaging (unless provided as part of a third-party software).

MJOG: Patients can reply to messages if given the option to do so. EG: Patients can CANCEL an appointment by texting 'Cancel' to the number stated in the text message reminder.

Text messages will be used for:

- Appointment Reminders
- Flu or other vaccination clinics for targeted eligible populations
- Chronic disease review invitations
- Cervical screening
- Blood pressure and cholesterol monitoring
- Smoking status updates
- Invitations for patient educational sessions (e.g. diabetic self-help groups)
- Requests to contact the Practice to arrange appointments or services

The above list is not exhaustive.

Test results will not be conveyed using text messages without the express consent of the patient and only when this consent was conveyed at the consultation related to the investigations. This is stipulated in more detail in our 'Texting results protocol's'.



Texts will not normally be used for important issues. Where an important matter is conveyed to the patient, a letter or other similar reliable method must be used. With specific and documented patient consent, it is acceptable for matters to be sent in this way; however this must always be followed up by more reliable means such as a letter. Text messages will never be a single means of communication (such as recall) and will always be part of a wider communication strategy which will convey the same information by at least one other method.

Texts will not, under any circumstances, be used to convey information which may be alarming or distressing to the patient.

Sending Times

Text messages should not be sent to patients before 8:30 or after 20:30, unless it is felt appropriate to do so (e.g. patient awaiting an urgent prescription before their holiday).

Delivery Reports

AccuRx: Staff can see when a message was delivered to a patient, or if that delivery failed, by opening menu and clicking on “My Failed SMS”. This list can be used to identify patients whose mobile number needs updating.

MJOG: Staff can see when a message was delivered to a patient by looking into “Status Reports” and looking at messages that cannot be sent/delivered. This list can be used to identify patients whose mobile number needs updating.

Tone

Messages should be phrased professionally, but do not require the same level of formality as a letter. Text abbreviations (e.g. ‘thnx’, ‘u’) are not appropriate, and the spell-check functionality in SMS software should be used to remove typos.

Clinical System

A text message is a patient contact in the same way as a face-to-face consultation or a letter. All text messages sent to a patient must be recorded within the clinical system as a text patient contact in a similar way to a telephone call. Details should include date, time, and message text. Where a reply is received this should also be recorded in the clinical system as a text message reply.

Information Governances

Phone Number Confirmation

To be confident that SMS messages are being received by the intended recipients, it is important that patient mobile numbers are kept up-to-date. The reception team should verify a patient's mobile number at an opportunity when speaking to a patient. Other members of the team should opportunistically update mobile numbers, for example confirming a mobile number before sending patient advice at the end of an appointment.

Data Processing

Text messages should only be sent for the delivery and administration of health and care services. They must not be used for marketing third-party services, or any other reason that



a patient would not reasonably expect. Greenway Community Practice follows NHS digital best practice guidance on the use of cloud services. Further information on this guidance can be found at <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/nhs-and-social-care-data-off-shoring-and-the-use-of-public-cloud-services>

GDPR

In accordance with The General Data Protection regulation (EU 2016/679):

Personal data is processed under the following legal basis for the purposes of direct care and the administration of health and care services:

6(1)(e) ‘...for the performance of a task carried out in the public interest or in the exercise of official authority...’

Personal data concerning health is processed under the following legal basis for the purposes of direct care and the administration of health and care services:

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9(2)(h) ‘...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...’

Personal data concerning health is processed under the following legal basis for the purposes of public health:

9(2)(j) ‘...necessary for reasons of public interest in the area of public health...or ensuring high standards of quality and safety of health care and of medicinal products or medical devices...’

Further guidance on GDPR and the legal basis for data processing can be found at:

<https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/information-governance-alliance-iga/general-data-protection-regulation-gdpr-guidance>

GDPR and Children

Sixteen is the normal age from which individuals can manage their own healthcare, as at 16 they do not have to be declared competent.

The practice should not record the parents mobile number on the record for any child aged 13 or over. Sending a text for a child aged 13 and over who has booked an appointment themselves, and do not want their parents to be aware of, will constitute a breach of their confidentiality.

Opt-Out

‘Consent’ is not used as a legal basis for data processing, and therefore messages are sent on an ‘opt-out’ basis. If a patient informs the practice that they do not wish to receive SMS messages, a member of staff must update their ‘Notification Preferences’.