



CYMORTH LLYWODRAETHU GWYBODAETH AR GYFER GOFAL SYLFAENOL  
INFORMATION GOVERNANCE SUPPORT FOR PRIMARY CARE

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# IG Guidance on MHOL Registration During COVID-19



## Introduction

In normal circumstances when patient's register for using MHOL this is done in a face to face setting where copy identification documentation is viewed prior to provision of a MHOL access being granted.

During Covid-19 there is more demand for online services and access with these being performed remotely via telephone and or email solutions, rather than in face to face settings, which presents some challenges for practices. This guidance is aimed to support practices in providing identification checks during this time. It is important that the practice ensures that they are providing access to the correct records and they have appropriate measures in place to remotely identify patients wishing to apply for online services.

There are a couple of ways this can be achieved either via vouching with confirmation or with review of ID documentation.

## ID Documentation

Most patients will be able to prove their identity with identification documents such as a passport or driving license. A Practice could request that the patient completes the MHOL request form electronically and email this to the practice along with a photo or scanned copy of their identification documents; and additional form of proof of address, for example, copy utility bill, where they have technology available.

Practices should however alert patients to take account of their own security and confirm that sending information by email does not provide end to end encryption and is done so at the individuals own risk.

Having the form available on the Practice website in an accessible format which can be populated electronically and emailed, would save the Practice time with requests for the form.

Alternatively, patients can hand deliver the form and documentation to the Practice letter box or post a copy of identification documents to the practice as verification.

The Practice may choose to follow up receipt of registration form and ID by calling the patient to verify details or utilise the NHS Wales Video Consultation Service if preferred.

There is no legal reason to keep copies of the ID once identification has been verified, therefore once the Practice is satisfied the copy documents should be securely and appropriately destroyed.

## Vouching with Confirmation

Vouching with confirmation is a less secure method of identification but can be utilised in circumstances where you are unable to obtain formal identification documentation from the individual. This should be completed by an authorised member of staff and involves asking questions relating to information held in the medical record. It is recommended that this approach be used for time limited access for example providing access for only an initial six months, by which time identity documentation should be provided to the practice or access revoked.

It is extremely important that the questions posed:

- Do not guide the individual in any way;

- Do not accidentally disclose information to the patient before their identity is verified;
- Include a range of at least 3 questions in addition to demographic information;
- Questions should not be easy to obtain answers to or guess.

For example:

1. Please confirm your full name  
*(Where a patient has an unusual surname or one that can be spelt in different ways i.e. Sean/ Shaun please ask the patient to confirm the spelling)*
2. Please confirm your date of birth
3. Please confirm your full address including postal code  
*(Ask the patient to spell elements of an address where this is complex)*
4. When did you last see a doctor/ nurse at this surgery? Which clinician was the appointment with?
5. Do you take any prescribed medicines? Can you tell me what they are? (there are a large number you could ask, please name three?)
6. Where was your last prescription sent?
7. Have you had an operation in hospital? Can you remember when and what it was for?

If the patient makes mistakes in their answers the Practice should be very cautious as the genuine nature of the request and require further identity information before providing access.