

# GP registration requirements

December 2020

# Background

- Healthwatch Southend identified a need to engage better with those groups who find services hard to access, such as people experiencing homelessness
- The SE Essex Alliance has also prioritised rough sleepers as an area for action
- As a first step, we examined the websites of those GP practices who have them to identify whether new patients are required to provide any form of identification or proof of address
- In our research, it became apparent that the issue of registering with a GP affects other parts of our community

# The official position

- NHS England have set out the processes for registering new patients in Primary Medical Care Policy and Guidance Manual (PGM). Section 4.9 covers this aspect
- There is no requirement for anyone to be “ordinarily resident” in England to register with and consult a general practitioner, nor is there any set length of time that anyone needs to have lived here before qualifying for primary care
- Access to secondary care, however, does involve consideration of nationality and residency.

# Proof of identity and address

- The Manual states that

... when applying to become a patient there is **no regulatory requirement** [our emphasis] to prove identity, address, immigration status or the provision of an NHS number in order to register. However, there are practical reasons why a practice might need to be assured that people are who they say they are, or to check where they live. Seeing some form of ID will help to ensure the correct matching of a patient to the NHS central patient registry, thereby ensuring any previous medical notes are passed onto a new practice. It is legitimate therefore for the practice to apply a policy to ask for patient ID as part of their registration process.

- However, the Manual emphasises the need for all individuals to be treated equally,

A practice policy should not routinely expect a patient to present a photograph as this could be discriminatory.

# Who might not have proof of identity or address?

NHSE recognises that there are groups of people who may not have documentary proof:

- People fleeing domestic abuse staying with friends, family or in a shelter.
- People living on a boat, in unstable accommodation or street homeless
- People staying long term with friends but who aren't receiving bills
- People working in exploitative situations whose employer has taken their documents
- People who have submitted their documents to the Home Office as part of an application
- People trafficked into the country who had their documents taken on arrival
- Children born in the UK to parents without documentation

There is no longer a requirement to share health information with the Home Office, which may have prevent some people from registering with a GP previously.

We know that Southend may have many people in these categories

# Patient information from the [www.NHS.uk](http://www.NHS.uk) website

- The GP practice must accept you, unless there are reasonable grounds to refuse you.
  - These must not relate to race, gender, social class, age, religion, sexual orientation, appearance, disability or a medical condition.
- You should not be refused registration or appointments because you do not have a proof of address or personal identification at hand.
- It's not considered a reasonable ground to refuse registration.
- This also applies if you're an asylum seeker, refugee, homeless patient or overseas visitor, whether lawfully in the UK or not.

# Process

- The research began with a desk-top approach - searching each website for information about how to register as a new patient
- Where a website lacked detail, a similar call was made to clarify requirements
- Where practices did not have a website, mystery shopper calls were made, enquiring as someone who had just moved in to the borough
- Eagle Way Surgery was included in this piece of work, although it will close at the end of December 2020

# Results – proof of identification

- We found nine practice websites asking specifically for photographic ID
- Where it was not clear about proof of ID, a call revealed a further four practices where photographic ID was needed
- Two practices asked for a form of ID, two others preferred a photographic ID
- Five asked for an NHS card or Red Book (for a newborn)
- The remaining practices had no requirements

# Results – proof of address

- Six practices specify a proof of address such as a bank statement or recent utility bill; four further practices also had similar requirements when probed
- One practice's requirement for a utility bill or similar were contained in a separate document embedded in the website; this was not immediately obvious
- Three practices said it was useful, but not a formal requirement
- One requires a proof of address (unspecified)
- Seven practices do not require any proof of address

# Results – no websites

We rang the four practices.

- All four require proof of address
- All four require photographic ID

# Results – information in other languages

- Seven practices have leaflets in a range of languages for asylum seekers explaining how to access primary care.
- Six of these make no reference to the need for utility bills or photographic ID and thus contradict other sections of the website. These leaflets also refer to NHS Direct, rather than the 111 service.
- All seven websites are developed by the same company

# Results - temporary residents and “immediately necessary treatment”

- Practices may offer care to people who are temporarily resident in their practice area for up to three months.
- In addition, people staying for less than this may be offered “immediately necessary treatment”
- Twelve practice websites carried no information on this aspect
- Ten practices did have information about this topic
- Two of these websites referred to the walk-in service at St Luke’s if patients required care pending their registration; this service no longer operates

# Conclusion

- The ability to register easily with a general practice is a fundamental part of the NHS
- Websites are part of the public face of a practice, and need to reflect the practice's policies; we must however not forget those without access to the internet
- We understand that NHS Southend CCG is working with its primary care networks to develop local services for people experiencing homelessness, which may address potential difficulties in registration for these individuals.
- However, there are other individuals who may not be able to confirm their address or identity in the formats required. We are therefore presenting this report to the CCG and Health & Wellbeing Board to highlight our concerns and in the expectation that practices will be encouraged to review their policies, which we believe discriminate against parts of the population

# Recommendations

1. We wish to see all practices in Southend having a website, that all websites are kept up to date and meet the Accessible Information Standard
2. All practices ought to have information about registration available in languages other than English. Where information is available in languages other than English, their contents must match the information available elsewhere on the website. We believe that the requirement to produce photographic ID is discriminatory and should be removed from all practices' procedures
3. Practice information should reflect the NHS.uk text on slide 6
4. Practice information should explain how to access care where immediately necessary, or as a temporary resident
5. Although not checked during this exercise, information on registering with a GP should be available for those unable to access or use the internet. This should be in a variety of formats
6. To ensure that other vulnerable groups are not disadvantaged, we would urge commissioners and practices to adopt the Safe Surgeries approach from Doctors of the World (<https://www.doctorsoftheworld.org.uk/what-we-stand-for/supporting-medics/safe-surgeries-initiative>)