

healthwatch Hackney

GP registration in Hackney, the right to access health care.



April 2021

Introduction

One of the key NHS principles is equality of access to NHS services, with access not to be refused on unreasonable grounds. Healthwatch Hackney has, however, become aware that many GP practices are requiring patients to present ID and proof of address. This is a serious obstacle that is preventing some Hackney residents from accessing primary health care services.

The importance of GP registration has been highlighted by the Covid-19 pandemic and the need to ensure all eligible residents have the opportunity to be vaccinated. Registration is also vital to ensure early access to diagnosis and treatment before health problems become severe, and appropriate use of primary health care rather than emergency services.

The Primary Care Policy and Governance Manual for GP practices is clear that there is no regulatory requirement to prove identity, address, immigration status or the provision of an NHS number in order to register (see appendix for full details).

In November 2019, City and Hackney Clinical Commissioning Group (CCG) issued a letter promoting a collaboration with the 'Doctors of The World Safe Surgeries program' to all City and Hackney GP practices. The letter also highlighted the importance of patient registration without passport or proof of address. Despite this action by the CCG, feedback we received from residents made us aware that there were still barriers preventing some residents from registering with GP practices. These barriers impact especially on people who are vulnerable. This includes those who are homeless, vulnerable migrants and asylum seekers and those with learning disabilities.

Methodology

Healthwatch Hackney staff and volunteers made calls to all 39 GP surgeries in Hackney over a two-week period in March 2021. They said they were calling from Healthwatch Hackney and asked staff to explain the process for registering with the practice. All calls were made after 9.30am to minimise the impact on patients calling to book an appointment.

The script used for each call was identical and we are certain that there was no variance in the questions put to reception staff.

Data collection sheet was used for all calls to ensure as much consistency as possible in the way information collected.

Our actual questions were:

- 1) What is the process for registering as a new patient?
- 2) Can a resident walk into the practice to register using a hard copy of the registration application?

- 3) Does the resident have to live within your catchment area?
- 4) Does the resident have to provide proof of ID or proof of address?

If yes:

- 5) What if they do not have any of these documents?

When calling practices to enquire about registration there were a small number of practices that were difficult to reach. Five calls took over seven minutes to be answered, one call taking 27 minutes to be answered, and two others 24 minutes. Multiple calls were needed to get connected to six practices.

Key findings

59% of GP practices asked for proof of identity

69% of GP practices asked for proof of address

Proof of identity

Twenty-three of the Hackney GP practices contacted asked for proof of identity. In most cases this needed to be photo identification, such as a passport or driving licence. Many Hackney residents are unable to provide this documentation. Reasons may include the cost of a passport coupled with no plans to travel (currently £85), or a passport being held by the Home Office. The Windrush scandal has highlighted how requiring a passport can result in citizens being denied access to services. In addition not everyone has a driving licence; nationally only 53% of black people having one.

One practice told us they would register a patient without proof of identity as a temporary registration so that they would not be denied care. Once documentation was provided, they would be taken on as a permanent patient.

We were told by one practice that they asked for proof of identity as they had had a number of “fraudulent” applications to join the practice that had been declined by the Patient Demographic Service. Another practice said that no proof of ID or address was required at the moment because of Covid, however, this could change.

Proof of address

Twenty-seven practices asked for proof of address. This was often justified by the need to ensure patients lived within the practice catchment area. One practice had a voice message stating: “To register you must live in this catchment area. Alternatively, visit the practice and bring proof of address and photo ID”. Some

practices were highly specific about the documents that were accepted, for example asking for two forms of proof of address, from the following; a tenancy agreement, Council tax bill, an original bank statement, or utility bill from the last three months.

Some practices showed some flexibility, for example stating that the practice manager would discuss the resident's circumstances and seek a solution. For example, by sending a complements slip to the patient's address and once the patient receives the slip they can then take it to the practice to complete their registration.

Registration for online services

Proof of identity and/or address was asked for to access online services at three GP practices.

Registration process

Many practices offered online registration, however, this was also often coupled with a requirement to bring documents to the surgery to complete the process. Other practices using an NHS hub for online registration only required documents if the patient registered using a paper form. A paper option to register was offered by nearly all practices. One of the practices, however, stated they would offer a paper copy only as a last resort, with the receptionist firmly stating that the patient should go to an internet café or library to complete the registration form. It is of great concern that patients are being deterred from registering with the practice because of their digital exclusion. This might be the result of lack of a device, lack of Wi-Fi or phone data as well as not have the skills to undertake the process.

Worryingly when we called the Heron Practice, in Woodberry Down, to enquire about the registration process was a mismatch between the information provided to Healthwatch Hackney and the information on the practice website. The practice is signed up to be a Safe Surgery and to require no documents, however, when we called, we were told they required proof of address.

Recommendations

- The NEL Clinical Commissioning Group contact all GP practices to emphasise that practices should not refuse to register patients who are unable to provide proof of ID or address.
- NEL CCG urgently request NHS Digital to change the process practices used to verify registrations with the Patient Demographic service, so that practices are not penalised for any discrepancies in patient details.
- Practices are encouraged to adopt a standard registration form that is sensitive to the inability of some residents to provide proof of identity and/or address.
- GP websites are changed to reflect best practice regarding patient registration e.g.
no proof of ID is required, it is only necessary for patients to confirm that they live in the catchment area.
- Reception staff are trained to understand that proof of address and identity must not be required, and that sensitivity is required to ensure all residents are treated equally and encouraged to register with a GP practice.

Appendix

Practice Name	Proof of ID required	Proof of address required	What information they need to register new patient?
Allerton Road Medical Centre	no	no	Online registration but paper copy is also available. No proof of ID or address is needed
Athena Medical Centre	no	no	As long as the resident states that they are within the practice's catchment area. Online registration but paper copy is also available. If available, information about the previous GP.
Barrett's Grove Surgery	yes	yes	Website states proof of ID and address are required to register. Can be completed online or paper copy can be picked up at the practice. Where possible, the NHS number and proof of address should be provided.
Barton House Group Practice	yes	yes	Need proof of ID and address. Can do it online or at the practice. The resident should be in their catchment area
Beechwood Medical Centre	yes	yes	Proof of address and proof of ID. Registration can be made online but the resident should come in to the practice with proof of ID. No restrictions of a catchment area, as long as the resident lives within Hackney.
Brooke Road Surgery	yes	yes	To register: Online registration or paper copy can be picked up at the practice. The person has to be in the practice's catchment area. Proof of ID and proof of address is needed to complete registration. If there is no proof, the case will be passed on to the practice manager. We were told patients would not be denied treatment but registered as a temporary patient until such time as they could provide ID.

Cedar Practice	yes	yes	Do not accept asylum seekers or anyone who can't prove their status in the UK. All registrations are currently online due to Covid-19 but paper copy of the form can be provided if needed. Pre Covid the registration requirements were - proof of ID and address. The voice message says: register online and come to the practice to complete registration.
The Clapton Surgery	no	yes	To register: Online forms or paper copy can be picked up at the practice. Where possible, the NHS number and proof of address and proof of ID should be provided. The proof is purely needed to identify if the person is within the practice's catchment area. Even a supporting letter will be enough to register the patient. The practice does not accept patients registered with the neighbouring practice. They are not "allowed".
Cranwich Rd Surgery	yes	yes	To register: Online forms or paper copy can be picked up at the practice. Website asks for proof of address and proof of ID. Stated proof is purely needed to identify if the person is within the practice's catchment area. They stick to the catchment area strictly as they are a small practice. If the person does not have proof, the application will be forwarded to the practice manager to deal with.
Dalston Practice	yes	yes	Proof of ID. The resident should be in their catchment area. No ID no registration.
De Beauvoir Surgery	yes	yes	Proof of ID and proof of address. The resident should be in their catchment area. Online form or pick up a paper copy from the practice - 2 registration forms - patient registration form and questionnaire. If the person does not have any proof their circumstances will be discussed with the practice manager and the team and a solution will be offered (where possible)

Elm Practice	no	yes	To register: Online forms or paper copy can be picked up at the practice. Where possible, the NHS number and proof of address should be provided. The proof is purely needed to identify if the person is within the practice's catchment area. If the person does not have the proof of address, the practice suggests sending them a complimentary slip to the address they live in. Once the patient receives it, they then take it to the practice to complete their registration.
Elsdale Street Clinic	yes	yes	To register: Online forms or paper copy. Proof of ID and address is needed to complete registration. No proof No REGISTRATION. Patient should be in their catchment area
Gadhvi Practice	yes	yes	Online forms or paper copy - proof of ID and address is needed as an attachment to the form. Patient should be in their catchment area. If the resident doesn't have proof of ID or address (for whatever reasons), they can still register but will be asked to provide the necessary information as soon as available.
Greenhouse Health Centre	no	no	No information is needed. As long as they are homeless, they will be registered.
Healy Medical Centre	no	no	To register: Online registration or paper copy can be picked up at the practice. No proof of ID or proof of address is needed. The reception thinks this is the new guidelines. The person have to be in the practice's catchment area.

The Heron Practice	no	no	Online registration but paper copy is also available. We were told once registration is completed the patient should email a copy of their proof of address/ banks statement, utility bill, tenancy agreement or council tax bill. No proof no registration. They stated is the practice policy to make sure that it is legal. Website, however, states they are a Safe Surgery and that it is possible to register without any documentation.
Hoxton Surgery	yes	yes	To register: Online registration or paper copy can be picked up at the practice. But they encourage people to register online. The person must be in their catchment area. Proof of ID and proof of address is needed. No proof NO REGISTRATION
Kingsmead Healthcare	yes	yes	Copy of tenancy agreement and utility bill from the last 3 months. Photographic ID for the purpose of using the online services such as prescription order. The resident should be in their catchment area. If you have never had a GP in the UK please provide: passport with valid Visa giving you permission to stay in the UK. If you do not have this, you must provide letters/documents from the Home Office giving you permission to stay in the UK.
Latimer Health Centre	yes	yes	To register: Online registration or paper copy can be picked up at the practice. Proof of ID and proof of address is needed to complete registration. The person has to be in the practice's catchment area. If there is no proof the person can register with the agreement that his information will be provided asap, otherwise their registration can get rejected. They need this information so they can provide it to the health authority (sic)
The Lawson Practice	yes	yes	Proof of ID and proof of address issued within the last 3 months. The patient should be in their catchment area. The patient will need to provide ID or proof of address within 28 days or to bring a

			supporting letter so they can stay registered.
The Lea Surgery	yes	yes	To register: Online forms or paper copy - proof of ID and address is needed. Patient should be in their catchment area and able to provide proof of ID and proof of address. If the resident doesn't have proof any of those (for whatever reasons) the practice can work out how to register the patient.
London Fields Medical Centre	yes in person	yes in person	No proof of ID or address is needed for the online registration form, but is required for the paper version. The resident should be in their catchment area.
Lower Clapton Group Practice	no	no	No additional documents are needed. As long as the resident is in their catchment area
Nightingale Practice	no	no	No proof of ID or address is needed. The resident should be in their catchment area. Registration is online only but paper copy can be given at the discretion of the practice.
Queensbridge Group Practice	no	no	To register: Online forms or paper copy - no proof of ID or address is needed. Paper copies are also available at the practice. Patient should be in their catchment area
Richmond Road Practice	no	no	No additional documents are needed. As long as the resident states that they are within the practice's catchment area
The Riverside Practice	no	no	To register: Online forms or paper copy - no proof of ID or address is needed. Paper copies are also available at the practice. Patient should be in their catchment area. Only if the patient would like to use the online portal would they will be asked to provide a photo ID.

Rosewood Practice	yes	yes	To register: Online registration or paper copy can be picked up at the practice. The person has to be in the practice's catchment area. Proof of ID and proof of address is needed to complete registration. If there is no proof the practice can make exception.
Sandringham Practice	yes	yes	To register: Online forms or paper copy can be picked up at the practice. Where possible, the NHS number and proof of address and proof of ID should be provided. If the patient doesn't have any but lives within the practice catchment area, they will need a supporting letter from anyone stating that the person lives at the address provided. Website states: "If you have a NHS number and provided this on your registration form you will not be required to bring in proof of ID + address".
Shoreditch Park Surgery	no	yes	To register: Online forms or paper copy can be picked up at the practice. Where possible, the NHS number and proof of address should be provided. No proof of ID is needed. If the patient does not have any proof of address but lives within the practice catchment area in temporary accommodation, then a temporary registration will be made. Anyone with no fixed address will be able to register.
Somerford Grove Practice	yes	yes	Proof of ID. The resident should be in their catchment area. Website requests patients do not visit to register due to Covid, online registration does not require ID or proof of address.
Southgate Road Surgery	yes	yes	Proof of address and proof of ID. Registration can be made online or at the practice. As long as the resident states that they are within the practice's catchment area

Spring Hill Practice	yes	yes	To register: Online registration only. They would consider providing a paper copy but as a last resort. The receptionist was firm saying that the patient should do it online at home or in a cafe or library. Proof of ID or proof of address is needed to complete the registration to ensure the patient lives within the practice catchment area. If no proof can be provided the case will be passed on to the practice manager.
The Statham Grove Surgery	yes	yes	To register: Online forms or paper copy - proof of ID and address is needed. Patient should be in their catchment area and able to provide proof of ID and proof of address. If the resident does not have proof of any those (for whatever reasons) the practice can work out how to register the patient (never had such a case before but they feel confident that after speaking to the practice manager a solution (even if temporary) can be found)
Stamford Hill Group Practice	no	yes	Proof of address such as bank statement, utility bill or tenancy agreement to ensure the resident is in their catchment area. The registration happens with a paper registration form.
Trowbridge Surgery	no	no	To register: Online registration or paper copy can be picked up at the practice. There is also an app DOCTOR IQ which the person can download to register. The registration there happens quickly. No proof of ID or proof of address is needed. As long as the person lives in the practice's catchment area - E2, E3, E5, E8, E9
Well Street Surgery	yes	yes	Proof of address issued in the last 3 months and proof of ID. The resident should be in their catchment area. If the resident who wants to register does not have any proof of ID or address (e.g. if they are lost) they can discuss the circumstances with the registration officer.

The Wick Health Centre	no	no	To register: Online forms or paper copy - no proof of ID or address is needed at the moment due to COVID. This information was needed pre COVID. Patient should be in their catchment area.
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Extract from the Primary Care Policy and Governance Manual (update February 2021)

Practices can refuse an application to join a practice list if:

- The commissioner has agreed that they can close their list to new patients,
- the patient lives outside the practice boundary; or
- if they have other reasonable grounds

4.9.3 In practice, this means that the GP practice's discretion to refuse a patient is limited.

4.9.4 In addition, when applying to become a patient there is no regulatory requirement 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.

4.9.5 Any practice that requests documentation regarding a patient's identity or immigration status must apply the same process for all patients requesting registration equally. A practice policy should not routinely expect a patient to present a photograph as this could be discriminatory.

4.9.6 The majority of patients will not find it difficult to produce ID / residence documentation, however there will be some patients who do live in the practice area, but are legitimately unable to produce any of the listed documentation. Examples of this may be;

- 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.

Reasonable exceptions therefore need to be considered and the individual registered with sensitivity to their situation.

4.9.8 As there is no requirement under the regulations to produce identity or residence information, the patient **MUST** be registered on application unless the practice has reasonable grounds to decline. These circumstances would not be considered reasonable grounds to refuse to register a patient and neither should registration or access to appointments be withheld in these

circumstances. If a patient cannot produce any supportive documentation but states that they reside within the practice boundary then practices should accept the registration

4.9.9 Where necessary, (e.g. homeless patients), the practice may use the practice address to register them if they wish. If possible, practices should try to ensure they have a way of contacting the patient if they need to (for example with test results).

4.9.10 If a practice suspects a patient of fraud (such as using fake ID) then they should register and treat the patient but hand the matter over to the NHS Counter Fraud Authority (NHSCFA)

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22 April 2021

City & Hackney GP practices
By email only

Dear C&H GP Practice Manager and lead GP partner,

RE: GP registration in Hackney, the right to access health care

I would like to draw your attention to the attached report from Healthwatch Hackney, which regretfully documents that some practices in Hackney are denying patients access to healthcare by insisting that new registrants produce certain documents.

This report is timely as NHE England/Improvement are running a campaign to encourage patients to register with a GP.

The Healthwatch report includes a useful extract from the Primary Care Policy and Governance Manual (Feb 2021 update). See the last two pages of the report.

Practices can ask for patient ID to help with matching to the NHS central patient registry. However “as there is no requirement under the regulations to produce identity or residence information, the patient **MUST** be registered on application unless the practice has reasonable grounds to decline...If a patient cannot produce any supportive documentation but states that they reside within the practice boundary then practices should accept the registration”.

Practices should **NOT** be asking for proof of registration status or address. Patients should also be registered in full unless it is clear that only a temporary registration is required.

Please do ensure that any of your staff involved in registering patients are aware of what is and what is not required. There is often a disconnect between what management believes is happening and what actually happens at the front line.

Previously we have encouraged you to sign up to Doctors of the World’s Safe Surgeries initiative. If you haven’t already joined please have a look and discuss within your team and with your PPG. Link to DOTW Safe Surgeries initiative:

<http://coronavirus.wel.nhs.sitekit.net/downloads/Updates/Safe%20Surgeries%20information.pdf>

Practices that are yet to do so can also sign up to the NEL Online Registration scheme, which allows patients to search for practices for which they live in the catchment area and submit a registration form. To date 30 practices are live for online registrations with over

2000 forms submitted since June 2020. For more information please contact [thomas.clark2@nhs.net](mailto:contactthomas.clark2@nhs.net)

I will ask Healthwatch to repeat their survey in six months' time and I look forward to seeing a very much-improved position on this matter. And for those practices that are already operating within the regulations thank you for your diligence.

Yours sincerely,



Richard Bull
Programme Director – Primary Care

Enclosures:

Healthwatch Hackney: GP registration in Hackney, the right to access health care

cc:

Dr Kirsten Brown – Clinical Lead for Primary Care, City & Hackney
Integrated Care Partnership

GP REGISTRATION - HEALTHWATCH HACKNEY May 2021 INFORMATION EXCHANGE MEETING

On 25th May 2021 we held an Information Exchange meeting on ‘Your Right to Register’ with a GP in Hackney.

Our guest speakers were: **Thomas Clark from North East London Clinical Commissioning Group and Rayah Feldman, Chair, Hackney Migrants Centre.**

Below is our descriptive report from the meeting with questions asked by the public.

We have also included several recommendations to ourselves and primary care service providers. We have already initiated a process to achieve implementation of these recommendations.

Our key concerns related to the ability of local residents, regardless of immigration status or any other factor, to register with a local GP. We had numerous excellent questions from participants and excellent responses from the speakers.

In this report you will find details of all aspects of the registration process and questions relating to registration of people with disabilities, carers, refugees, asylum seekers and undocumented migrants, as well as interpreting and advocacy services and several other issues. At the end of this document, you will find our Recommendations to local primary care services.

HOW TO REGISTER WITH A GP

GPs can register anyone they wish. However, all GP practices have a catchment area and must register any person living within that catchment area, unless the GP practice’s list is full. All the GP practices in Hackney (2021) are currently open for new patients. GPs may also elect to register people that live outside of their catchment area, but can decline to provide certain services due to the distance from the practice, e.g. home visits.

Out-of-area registrations - Extended Catchment Area

There is no obligation to participate in this scheme - practices can choose whether to register out-of-area patients, who can access all services from the GP practice except home visits and urgent treatment. NHS England is responsible for procuring urgent GP services and home visiting should a patient need to be seen where they live. In most areas this will be delegated to CCGs through co-commissioning arrangements. Practices should only register an out-of-area patient after they have got assurance from the regional team or CCG that these arrangements are in place where they live.

<https://www.legislation.gov.uk/ukxi/2015/1862/regulation/30/made>

You can look up GP surgeries for your area to see what they offer:
www.nhs.uk/service-search/find-a-gp

This link will show you GP practices nearest to where you live. Once you have identified a GP that you think might meet your needs, you should contact them to see if you live within their catchment area. If you are within their catchment area, or if you live outside their catchment area and they are willing to register you, you can go to the surgery and register, or give them a call, or register with them online.

According to the Regulations, you are not required to show ‘photo ID’ to prove your identity or provide evidence of your address.

To register at some practices, you can download the GMS1 online registration form, which is the standard registration form for GPs. You can also print it out and hand the completed form to the GP practice.

As an alternative, if you live in northeast London, you can use this link to [Register with a GP online - NHS London \(eastlondonregistergp.nhs.uk\)](http://eastlondonregistergp.nhs.uk).

Once you enter your postcode, the site will show you the GPs whose catchment area you live in. You can then choose the practice you want to join, complete an online registration form, and submit it. Your information will automatically go through to the chosen GP, and they must register you. Once you are registered, the GP practice may contact you for a health check and might provide information about the services they provide.

The 2021 Healthwatch Hackney report on GP registration showed that **some practices were still asking for proof of address or ID to register when that is not legally required**. You will be asked for your address, and the GP administration team will check if you're in their catchment area, but you do not need to provide any documentation to prove that's where you live. Equally **ID is not required for registration**.

ID will only be required if you want to view and have access to your medical records online. You will not have access to this very sensitive and confidential information without verifying your ID, e.g. by producing one of the following:

- passport
- birth certificate
- [HC2 certificate](#)
- your rough sleepers' identity badge
- your hostel or accommodation registration or mail forwarding letter
- If you're homeless, you can give a temporary address, such as a friend's address, a day centre, or the GP surgery's address.

Not having a home address must not prohibit your registration.

ID can also be verified via the [NHS App](#). For more information go to <https://www.nhs.uk/nhs-services/online-services/nhs-log-in/>

You have a right to request a copy of your medical notes in hard copy from your GP at no cost. Your GP will check your records before you receive them, to make sure that you are unlikely to be harmed by anything you read in your medical records.

See detailed advice on access to medical records on the BMA website: <https://www.bma.org.uk/media/2821/bma-access-to-health-records-june-20.pdf>

QUESTION AND ANSWERS WITH THOMAS CLARK - CCG

(Thomas' full presentation is available [HERE](#))

1. Why I might be refused registration.

There are a limited number of reasons why you could be refused registration:

- If you're outside the GPs catchment area
- If the GPs list is closed because they have too many patients and not enough staff/capacity.
- If you have previously been removed from the practice list because of inappropriate behaviour. In this case there are alternative means of getting access to GP care.

2. What to do if you are refused registration

If you do have problems registering, you can

- call the NHS England Customer Contact Centre on: 0300 311 22 33
- contact Healthwatch Hackney on 020 3960 7454

If the GP refuses you registration, they need to give you a sound explanation.

3. Can you confirm that all GPs have a catchment area, and that area is the boundary within which they expect their registered people to live?

Yes, all GPs in their contract will have a specified INNER and an OUTER catchment area, from which they will take on patients. They will take new registrations from anyone that lives within the inner catchment area. The outer catchment area is a place for patients that are registered at the GP but might move outside of the inner catchment area but are still relatively local to the practice.

If the patient moves outside of the catchment area, after registering with a GP, the GP has a legitimate right to remove the patient from their list and ask the patient to register elsewhere. Normally, this does not happen unless it's clear that the patient has care needs that might be better met by services more local to where they live.

4. Changing GP practice

There might be a variety of reasons for you wanting to move to another GP practice, e.g.

- you have moved

- you have had problems with your current practice
- you were removed from the patient list by the GP
- you need a GP practice with better disabled access

5. Transferring GP Practices and Transfer of Medical Records

Tell the GP surgery if you change your address, as you might be moving out of the catchment area. The process of moving from one practice to another is much the same as registering described above. Your medical records will be transferred from your old practice to the new one, and this should not take more than a few days.

Most records should transfer electronically through a system called GP2GP. These electronic transfers should take three days from the point when the patients' registration with their new GP is processed, although there can sometimes be exceptions due to technical issues.

The historical paper records (if not already fully uploaded to the electronic record) can take a bit longer because the physical records need to be collected and delivered to the new GP, but this should not prevent the new GP from providing a consultation using the electronic record.

6. Do I need to be registered with a GP to get the COVID-19 vaccine?

It is easier to get a Covid 19 vaccination if you are registered, because GP practices provide lists of patients that fit the cohort of patients that are being called for vaccination, **but registration is not essential to get the vaccination.**

If you have never been registered with a practice and you don't have an NHS number, there are 'walk-in' vaccination clinics that you can attend. They will issue you with a temporary NHS number. You can call Healthwatch Hackney for further information.

7. Is there data sharing between the Immigration department and the NHS?

It is claimed that there is no data sharing between the Home Office and GP practices or hospitals, but at Information Exchange meeting, Rayah Feldman from Hackney Migrant Centre expressed concerns around potential data-sharing and its potential impact on access to NHS services by diverse and often vulnerable migrant populations. This could make vulnerable patients fearful of seeking healthcare.

8. Can undocumented migrants receive other treatments from their GP aside from COVID vaccine?

Undocumented migrants have a right of access to all primary care services free of any charge. They can also access Accident and Emergency care at no cost.

9. What services are the chargeable to undocumented migrants?

Depending on the patient's immigration status, referrals and treatments in secondary (hospital) care might be chargeable.

Details of migrant health entitlements under the NHS can be found [here](#).

<https://www.gov.uk/guidance/nhs-entitlements-migrant-health-guide>

10. Where an informal carer wants to be registered at the same surgery as the person they care for, or the other way around, what can be done to deal with registration refusal because one party lives within one catchment area and the other party lives a road width outside the catchment area?

Most GPs will probably be receptive to that request. Someone that's in need of informal care may need home visits or more intensive care from their GP practice. It wouldn't be recommended for someone who has such needs not to be registered within the catchment area of their GP. It would make more sense for a carer who is mobile and doesn't have complex health needs, to register with the same practice as the person they care for. But practice would have consider this issue on a case by the case basis.

11. Some surgeries in Hackney offer translation services or other culturally appropriate services. A patient may only speak a community language or may need sensitive care that shows regard to the person's culture or religion. Is there any flexibility around language and culture that would enable patients to register at a practice where they would get the very best care through better communications and insight into their culture?

Generally, GP registration will operate on a catchment area basis. There are practices identified as having quite large populations of people who speak certain languages as their first language. All practices in City and Hackney have access to Bilingual Advocacy Service that is commissioned from the Homerton and paid for by the CCG. There are obviously limits to the capacity of that service, as with any other NHS services, but they can access face-to-face interpretation services, and all have access to telephone interpretation services.

The way practices organise those things can vary, because the telephone interpreter consultation is going to take longer than the 10-minute slots that are the usual time allocation for GPs. Some practices are very proactive in how they organise those

sessions, if they know that they have someone who is going to need that more intensive level of interpretation.

The CCG commissions certain services under a contract with GP practices, to try to ensure that they give enough time to meet the needs of people who do not speak English as their first language. But the central question is whether the flexibility should be over catchment area or on a wider area basis. It is more about making sure that practices who have patients with special language or cultural needs can meet those needs adequately, wherever the patient lives.

12. As a lot of languages are spoken by GPs in Hackney, could relaxation of rigidity regarding catchment areas be reconsidered? If for example you're a Turkish or Lithuanian speaker and you know a practice in a different catchment area, not very far away, that has a doctor who speaks your language, could you register with that practice? Moving to that practice could obviate the need for use of interpreting services, and longer appointments would probably not be required.

The national guidance manual and the contractual arrangements are not something the CCG could influence from a City and Hackney perspective. We cannot deviate from the national GP contract. It is the GP who holds the risk for the care of their patients, and they have to decide where discretion is exercised regarding registration.

13. Feedback from some residents who have English as their second language suggested that some GPs are reluctant to use the telephone interpreting services. Many residents are also not aware of this service. What can be done?

The CCG commissioned the bilingual telephone interpreting/advocacy service for all GP practices as part of the contract with Homerton Hospital. They also subcontract to charities that have specific language skills who carried out face to face sessions in practices before the pandemic. It is hard to say if individual members of staff are adequately informed about where this service is commissioned and how it's paid for.

14. Would you confirm that patients can request telephone interpreters for GP consultations or a face-to-face interpretation?

Patients should inform their GP of their need for interpretation at the point of registration, and then when they make an appointment, practices should have alerts within their clinical system, which tells them that the patient will need interpreter.

15. It is important that practices recognise the needs particularly of undocumented migrants or people who are asylum seekers. The knowledge of receptionists and the clinical staff makes a significant difference to the interaction between the patients and the practice during the registration process.

We do encourage practices to sign up to the Safe Surgeries programme and engage with the toolkit. We have written to them all and we have visited all the practices in the past to encourage them to sign up. It is something our clinical leaders have recently been discussing with Doctors of the World. In the past the CCG has had grant schemes with local voluntary sector organisations around signposting for migrant health, and helping migrants to register with practices. We would welcome any kind of engagement to better understand migrant's health needs.

16. Which practices in Hackney which are currently signed up to the Safe Surgeries scheme?

- Lower Clapton Group Practice
- Spring Hill Practice
- The Lawson Practice
- Allerton Road Medical Centre

17. What enhanced services are offered by Hackney GPs?

The best place for patients to obtain information about the services offered by their GP is from the practice. An overview is generally available on the practice website, with further information available on request. The majority of routine GP services are consistently offered by all practices as they are subject to the national GP contract.

In City & Hackney, most **local enhanced services** (LES) are commissioned through the local GP Confederation for 100% population coverage, so these services are available at all of the practices in Hackney. Information on these services can be found [here](#).

In addition to local enhanced services there are **national enhanced services** that are commissioned as part of the national GP contract. These include:

- Learning Disability Health Checks - offered by 100% of C&H GPs:
- Minor Surgery - offered by some practices depending on whether they have a suitably qualified GP with a special interest.

In relation to minor surgery your GP's website should contain information on whether they offer this service, but even if they don't they may be able to refer you to a practice that offers this service.

18. In some types of secondary care, migrants are charged to receive health care. How does this relate to community services like physiotherapy and foot health?

Details of migrant health entitlements under the NHS can be found [here](https://www.gov.uk/guidance/nhs-entitlements-migrant-health-guide).
<https://www.gov.uk/guidance/nhs-entitlements-migrant-health-guide>

Most community services in The City and Hackney, including physiotherapy and foot health, are commissioned from the Homerton Hospital under a block contract. By-and-large this means that there should not be any additional costs arising from treatment provided by these services.

PCNs now also offer a First Contact Physiotherapy service that is accessible directly through your GP and, like other GP services, is free under migrant health entitlements.

PCN - Primary Care Networks. These are clusters of GP practices that work more closely together.

19. Where a surgery is inaccessible to wheelchairs, but the nearest accessible surgery is in a different catchment area, and enforces rigid registration rules what can be done?

That person could make the argument to the nearest practice with full disabled access, that their needs can be better met by joining that practice. Physical access to GP practice premises should be compliant with relevant legislation in relation to wheelchair access. However, in some cases GPs do not have direct control over the suitability of their premises, which are in many cases not owned by the GP partners themselves.

Should a wheelchair user wish to register at a practice in a different catchment area to where they live, on the basis that the premises has good wheelchair access, there is no reason that they cannot approach that practice to register and explain their reasons for doing so. Whether the GP agrees is at their discretion, but it should be noted that this decision is likely to consider other factors, such as whether the distance between the patient's home and the practice is likely to compromise the GP's ability to treat the patient, whether they will need home visits etc.

20. What is the relevance of the Equality Act in terms of requiring a practice to show flexibility regarding disabled access to a surgery? How could the Equality Act be used to enhance access to GP practices for disabled people?

Disabled access under the Equality Act is a compliance issue that is regulated by the Care Quality Commission (CQC). Should a practice fall short of its duty to make reasonable adjustments for disabled people when accessing services, this can be picked up during CQC inspections and subsequently be added to the practice's CQC action plan.

As mentioned in the report, a practice's immediate ability to address such actions can be limited by the availability of capital funding and/or permission/support from the owner of their premises (if not owned by the GPs or NHS Property Services).

21. Which GP practice in Hackney do not have disabled access?

The CCG is not currently aware of any City and Hackney practices that have a compliance issue with disabled access and, in the past, has supported funding applications by local practices to make their building more accessible to disabled people. However, should Healthwatch Hackney or local disabled patients be aware of any issues at our practices we would be happy to help the practice explore possibilities to address these issues.

22. Is a copy of the Memorandum of Understanding - on data sharing available?

If this is referring to an MOU between the NHS and the Home Office, I am not aware of any such document that applies currently.

23. Apart from the work we're doing with regard to the Healthwatch Registration Report, what other methods would suggest in trying to ensure that GP practices are following the rules more closely.

If the GPs are hesitant about following the registration rules (not asking for ID and not asking for addresses), we should talk to them and find out the basis of their hesitancy and see if we can help them overcome it sympathetically. We can let them know what it feels like to meet a hostile receptionist when you are trying to register. It is also really important for GPs, primary healthcare staff and all receptionists to know about migrant's experience of GP services.

PRESENTATION FROM RAYAH FELDMAN

(Full presentation available [HERE](#))

Not all migrants are the same. The ones that we're talking about have difficulties registering. Sometimes they have very distinctive needs. People face problems with registration in different ways. Special difficulties are faced by people who:

- Are recent migrants and are undocumented, i.e. don't have leave to remain
- Can't speak English
- Have no recourse to public funds
- Have existing or long-term conditions
- Have families with children or are single people
- People with unstable, precarious or no accommodation
- People with history of trauma or abuse

These issues need to be understood and addressed.

If you're a person with a history of trauma and abuse which many people are who try and register with a GP, then all these things become very problematic.

The Hackney Migrants Centre really welcomes the report from Hackney Healthwatch. It is great report but also quite shocking to discover that nearly two-thirds of practices surveyed in Hackney wanted proof of address for people trying to register with them. We live within a hostile environment for migrants and that affects all sorts of things, e.g. We can't guarantee that there's no data sharing between primary care and other government agencies, e.g. the Home Office - there isn't a Memorandum of Understanding as there used to be.

We know there is a huge amount of data sharing between the Home Office and hospitals, and it's very difficult for people to distinguish which bits of the NHS don't share data and which bits do. What happens if you're referred to the hospital for a blood test, will the hospital ask the practice to confirm your immigration status before taking your blood? The cost of hospital care is not what is behind the charging of migrants. The charging of migrants is a deterrent policy, which is used by the NHS as part of the Government's hostile environment policy.

Vaccine hesitancy about COVID

People are afraid of their data being shared with the Home Office. Other barriers include language. Some people may need help with registration. A frequently cited

issue is hostile and unsympathetic attitudes of reception staff. Poorly trained receptionists can prevent patient's having access to services. I have got one recent case from the Hackney Migrant Centre, where an advice worker reported that a few weeks ago a migrant aged nearly 70 tried to get antibiotics from his GP as he had cellulitis in his foot. They asked him if he smoked, and he said he sometimes smokes weed - he's a Rasta. It seems the GP receptionist refused to give him an HC1 form, which is the form you need to claim exemption from prescription charges, and she said if he can afford weed, he can afford to pay for his prescriptions. And he didn't get a prescription and it resulted in him being hospitalised as the infection became very serious. He's been here for 20 years and we're trying to help him get his immigration status. Years ago, I did some work with health advocates in Hounslow, and they found some receptionists with frankly racist and xenophobic attitudes towards migrants.

Better Training for Front Line Staff

NHS staff should be more aware of the registration guidance and how to implement the rules about charging for treatment and medication. Most NHS workers don't know who's entitled, who's not entitled, what they're entitled to, what they're not entitled to.

Equally and in a different way, migrants may not know how the NHS works. There is a reluctance in GP practices to use language translation services (even though these are paid for by the CCG). Undoubtedly, it takes longer and is more complicated to use an interpreter. People frequently complain that they can't get their point across to the GP, and similarly a traumatized asylum seeker may feel that there is a lack of in-depth clinical investigation by their GP. Many visitors to the Hackney Migrants Centre say that they feel unwelcome in primary care and not confident enough to complain.

The cost of medication and treatment:

Some people are not aware that they can get an exemption from prescription charges regardless of their immigration status.

Doctors of the World which set up the 'Safe Surgeries' initiative', is aiming to encourage GP surgeries to follow certain simple rules, to make clear to their patients that the surgery is a safe place to receive care. [Safe Surgeries Toolkit - Doctors of the World](#)

OUR RECOMMENDATIONS

- 1) All primary care staff should be fully trained in the Regulations regarding registration with a GP practice.
- 2) Information about access to GP services and emergency services should be easily available to patients.
- 3) Carers should be able to register at the same practice as the person they care for, e.g. if the carer lives outside the GP catchment area of the person they care for.
- 4) Disabled people should be able to register at the nearest practice with adequate facilities and full access for disabled people.
- 5) A flexible scheme should be introduced to enable patient to register with a GPs who speak the same language as the patient, regardless of catchment area.

HEALTHWATCH HACKNEY WILL DISCUSS WITH PCNs:

- 1) New approaches to enabling carers to register at the same practice as the person they care for, e.g. if the carer lives outside the GP catchment area of the person they care for.
- 2) The need for flexibility to enable disabled people to register with the nearest practice with adequate facilities and full access for disabled people.
- 3) The introduction of a flexible scheme to enable patient to register with GPs who speak the same language as the patient, regardless of catchment area.
- 4) The production of a Directory of all interpreting and advocacy services available to GP practices and patients in Hackney.