

Registering as a new patient at a GP practice in Hillingdon

Who we are

Healthwatch Hillingdon is an independent organisation set up to champion the views of local people. We speak up for our residents and put them at the heart of health and social care in Hillingdon.

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Background information

In 2016 Healthwatch Hillingdon received a number of complaints from residents who had been refused registration at GP practices, because they did not have photographic identification. As this is contrary to the regulatory terms of the General Medical Services contract, Healthwatch Hillingdon raised concerns at the Hillingdon Clinical Commissioning Group Primary Care Access Forum. As a result, Healthwatch Hillingdon worked with the Clinical Commissioning Group and the Forum to produce guidance for GP practices on registering new patients (Appendix A - information accurate when produced in 2016).

Context

Under the regulatory terms of the General Medical Services contract, practices must contractually register patients on application and can only turn them down if:

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

There is no requirement under the regulations for a patient to prove identity, address, immigration status, or give their NHS number to register, or receive an appointment. If a patient tells the practice their details, but cannot provide photographic identification, or proof of address, it cannot be considered as reasonable grounds to refuse registration.

Practices can have a policy in place to ask patients to provide identification, but they cannot insist on seeing it to register them. Seeing some form of ID will help to correctly match a patient to the NHS central patient registry and enable quicker access to any previous medical notes.

To meet equality laws, the I.D. Policy must be non-discriminatory. Under the terms of their primary medical services contracts, GP practices cannot refuse an application to join its list of NHS patients on the grounds of race, gender, social class, age, religion, sexual orientation, appearance, disability or medical condition.

Further context:

- 📄 [Primary Medical Care Policy and Guidance Manual](#)
- 📄 [Leaflet for asylum seekers and refugees](#)
- 📄 [Leaflet for gypsy, traveller and Roma communities](#)
- 📄 [Leaflet for homeless patients](#)
- 📄 [Information for visitors from abroad about using the NHS](#)

A patient does not need to be “ordinarily resident” in the country to be eligible for NHS primary medical care -this only applies to secondary (hospital) care. In effect, therefore, anybody in England may register and consult with a GP without charge.

Where a GP refers a patient for secondary services (hospital or other community services) they should do so on clinical grounds alone; eligibility for free care will be assessed by the receiving organisation.

It is important to note that there is no set length of time that a patient must reside in the country in order to become eligible to receive NHS primary medical care services.

Therefore all asylum seekers and refugees, students, people on work visas and those who are homeless, overseas visitors, whether lawfully in the UK or not, are eligible to register with a GP practice even if those visitors are not eligible for secondary care (hospital care) services.

The length of time that a patient is intending to reside in an area dictates whether a patient is registered as a temporary or permanent patient. Patients should be offered the option of registering as a temporary resident if they are resident in the practice area for more than 24 hours but less than 3 months.

Mystery Shopping Exercise

During May and June 2018, Healthwatch Hillingdon carried out a mystery shopping exercise to determine whether, when registering new patients, GP practices in Hillingdon were following the guidance produced in 2016.

Methodology

There are 46 GP practices in the London Borough of Hillingdon. Healthwatch Hillingdon contacted each practice by telephone during the core contract hours of 8am and 6.30pm.

Where the call remained unanswered on the first occasion, a second and final attempt was made to contact the practice.

We asked the same questions to each practice:

- 1) I am new to the area and would like to register with a GP. How do I register?
- 2) Is there anything I need to bring with me, or that you need to see?

Supplementary question if required: What if I do not have any of these?

- 3) Is there any other information I need to know?

Calls were made by a trained volunteer member of the Healthwatch Assessor team.

Outcome

We spoke with 42 GP practices. On all occasions the questions were answered by the person who picked up the telephone.

The remaining practices were either engaged, or they were closed and there was an answerphone message advising patients of whom to contact.

The majority of practices asked for the caller's address before answering questions to check that they were in the practice's boundary area.

Responses

How do I register?

41 practices advised the need to complete forms.

36 specifically mentioned the need to call in to collect a registration form(s), or pack, to complete. Some said this could be done in the surgery, but the majority said to take the form home to complete and return.

3 also advised that information was available on their website and indicated that you could download the registration forms; 1 saying you could complete a GMS1 form online but would need to bring into the surgery.

2 said that they would also need to take 2 blood pressure readings at registration.

Is there anything I need to bring with me, or you need to see?

2 practices said there was no need to bring in anything to register.

40 asked for proof of identification.

36 wanted to see both photo ID and proof of address. 2 asking for 2 proofs of photo ID and 2 asking for 2 proofs of address.

4 only required proof of address.

2 practices asked for proof of NHS number in addition.

30 specifically mentioned passport; 17 driving license; 18 birth certificate; 6 other photo ID; and 2 marriage certificate.

Examples given for proof of address included tenancy agreement, utility bill or bank statement. 2 stated it must be within the last 3 months.

And, if I do not have any of these?

Our mystery shopper explained during their conversation that they were only just moving to the area and didn't have a bill or statement of the address, they did not have a passport, nor drive.

Most practices indicated that they really did need photo ID and proof of address. Some practices said they would accept one or the other, or suggest alternatives such as other photo ID, tenancy agreement or birth certificate. When pushed, 2 practices said 'we can probably sort something out'.

Of the 40 practices who originally asked for identification, not one advised the caller that they would be able to register without identification.

Is there any other information I need to know?

With the exception of 1 practice, who advised they were open on a Saturday morning, all practices advised there was no further information needed.

Conclusion

With only 2 of the 42 practices contacted indicating that they would have actively registered the caller despite their circumstances, and an insistence from over 90% of practices that identification was required to register; Healthwatch Hillingdon have concluded that there is a high probability that GP practices are not following the guidance produced in 2016 and therefore not meeting the regulatory terms of their General Medical Services contract.

‘If a patient cannot produce any supporting documentation but states that they reside within the practice boundary then practices should accept the registration’

Our mystery shopper was not in a position where they were refused registration as a result of not having identification. However, from the conversations held Healthwatch Hillingdon feel that if the caller had presented at any of these 40 practices to register without identification, the majority of practices would have refused the caller registration and asked them to return at a time that they could provide the required identification.

Healthwatch Hillingdon are not in sight of the registration policies that practices have put in place to ask for patient ID. With the default position in the General Medical Services contract being ‘practices must register without identification’ we would question, from the evidence we have collected, whether current policies reflect the contract requirements. This would also bring into question whether policies are non-discriminatory and meet the Equality Act 2010.

Recommendations

As a result of this mystery shopping exercise, Healthwatch Hillingdon would recommend that NHS Hillingdon Clinical Commissioning Group and NHS England consider the following actions:

- 1) Advise GP practices of their legal responsibilities when registering a patient under the General Medical Services Contract, by:
 - a. writing to GP practices to outline their responsibilities
 - b. raising through locality meetings and practice managers forums
 - c. reviewing and reissuing the registration guidance sent to practices in 2016
- 2) Seek assurance from GP practices that their registration policy meets the General Medical Services Contract and Equality Act 2010; and if necessary ask GP practices to submit their policy for audit.
- 3) Suggest GP practices review their policies, to ensure that when a person is unable to provide ID (such as our mystery shopper) that there is a process written into the policy that enables staff to meet the legal responsibility to register a person without ID.
- 4) Suggest that GP practices revise the information given to patients at registration.

For example:

“We aim to provide the highest quality healthcare. You are not required to provide ID at registration, but it will help us to transfer your notes from your previous doctor as quickly as possible. By knowing your current medication and medical history our doctors will be better placed to provide continuity of care and treat you according to your needs.”

Practice Patient Registration Flow Chart

Appendix A

Anyone who is in the UK may receive NHS primary medical services at a GP practice. There is no set length of time that a patient must reside in the UK in order to become eligible to receive NHS primary care services.

Flow Chart to be used in conjunction with the

"Patient Registration Standard Operating Principles for Primary Medical Care (General Practice)"

Determine if applicant lives in GP practice catchment area

Inner Boundary: Anyone residing within GP practice catchment area is entitled to apply to register for primary care medical services

Outer boundary (where a GP practice has one): If clinically & practically appropriate, GP practice can decide to register applicants residing in their outer boundary without any obligation to provide home visits or services out hours



Proof of Residence or Personal

Identification (ID) There is no regulatory requirement for applicants to prove identity, address, and immigration status or to provide NHS number to register & it is not the role of general practice to establish identity of applicant. If it is GP practice's policy to ask applicant at registration to provide some form of ID &/or proof of residence to assist allocating their NHS number, then it must ask this from all patients. Examples below are not exhaustive:

- Council tax bill / Utility bill (gas, electricity)
- TV licence
- Phone bill stating address
- Driving Licence (with address)
- Credit card/Bank statement/Bank card
- Rent book or tenancy
- Pension book / benefit book
- Home Insurance Policy
- Home Office permit to stay
- Documentation from reputable source e.g. letter from HM Revenue & Customs, voluntary organisation, refuge, University, College Hall of Residence, Healthwatch

GP practice cannot insist on seeing photo ID as this could be discriminatory

Reasonable grounds to not register

- Applicant does not reside within GP practice catchment area
- On a case by case basis: Applicant previously removed from GP practice list following breakdown of GP/patient relationship. However, where possible resolution should always be sought.

Refusal must not relate to applicant's race, gender, social class, age, religion, sexual orientation, appearance, disability or medical condition. It is not acceptable to refuse to register an applicant because they are registered with another local practice. Where GP practice refuses to register applicant, they must record name, date & reason & write within 14 days to applicant explaining why they have been refused

Patients who cannot provide documentation (when it is GP practice's policy to ask for it)

Some applicants stating that they reside within GP practice catchment area will be legitimately unable to provide ID or proof of address & this would not be considered reasonable grounds to refuse registration or withhold appointments.

Examples below are not exhaustive:

- People fleeing domestic violence staying with friends or family
- People living on boat, in unstable accommodation or street homeless
- People working in exploitative situations whose employer has taken documents
- People who have submitted documents to Home Office as part of an application
- People trafficked in to the UK who had documents taken
- Children born in the UK to parents without documentation

Register as emergency or immediately necessary

Treatment if applicant resides within GP practice catchment area for less than 24 hours

Temporary resident

Overseas visitor - a resident, or at the time of registration are intending to be resident, in GP practice catchment area for more than 24 hours but less than 3 months. Overseas visitors, whether lawfully in the UK or not, are also eligible to register with a GP practice.

REGISTER PATIENT

Hospital Care Is Chargeable to Overseas Visitors