



My Right to Healthcare: GP Registration and Access

April 2019

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1 Right to Access Healthcare

While everyone in England has the right to access Primary Health care, a small section of our community in Milton Keynes are struggling to register at a GP practice because they are unable to provide identification requested by GP Practices. These individuals are subsequently unable to access Primary Care, indirectly being denied their right to access Primary Care against NHS England's (NHSE) guidelines and are only able to access Primary Care through local Urgent Care services. Healthwatch Milton Keynes is concerned about the impact on the health and wellbeing of some of the more vulnerable groups in our society.

Healthwatch Milton Keynes (HWMK) became aware of this issue in 2017 when Enter and View volunteers saw notices in more than one GP surgery in Milton Keynes. The notice claimed identification provided during the registration process would be checked by the Home Office. HWMK queried this with NHS England (NHSE) through a Freedom of Information Request (FOI) who confirmed that this activity was a breach of patient confidentiality and is not endorsed by NHSE. This coupled with a local focus on barriers to access GP services by homeless people and particularly rough sleepers, formed the foundation of our 'Right to Access Healthcare' Project.

The scope of the project included the design and distribution of a 'Right to Healthcare Card' based on similar projects taking place nationwide to address barriers to GP registration, communications with GP practices and a mystery shopping exercise to test the card's effectiveness. We anticipated that through the wide distribution of the card, people experiencing issues would call the Healthwatch Milton Keynes number on the card and share their experiences with us.

HWMK recognises that there are practical reasons why, when registering new patients, GP practices may ask identification. We advise people that if they have identification, they should take it with them when registering at a GP practice. However, this report is aimed predominantly at the issues faced by those who are genuinely unable to provide identification to prove that they live within a specific practice boundary.



2 The NHS Policy

The *Primary Medical Care Policy and Guidance Manual (2017)*, which is to be adhered to by all Commissioners of Primary Medical Care (Appendix A), states that there are practical reasons why GP practices may ask patients for identification. For example, to be assured that the person is who they say they are, and to ensure the correct matching of a patient to previous medical notes. However, the national policy also clearly acknowledges that whilst the majority of patients will be able to produce documentation, some individuals will be legitimately unable to.

4.9.6 Examples of this may be;

- People fleeing domestic violence staying with friends or family
- 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 documentation 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

4.9.7 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 regulation 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.**



HWMK recognises that GP practices can decline to register patients if the commissioner has agreed that they can close their list to new patients, or the patient lives outside the practice boundary. However, when, due to an individual's circumstances, they are legitimately unable to produce identification, exceptions must be made, and they must be registered regardless.

Milton Keynes Clinical Commissioning Group (MKCCG) told us that “GP Practices are able to ask patients for photo id or proof of address as long they ask all new patients registering to produce the same information. This helps establish if the patient lives within the GP Practice catchment area and if spelling of names is correct (this avoids mistakes which can cause multiple problems). If a patient is unable to provide this information at the time of registration, the practice is still able to register the patient as long as they have no concerns with regard to possible fraud (and potentially safety issues where a person can attempt to register with two different practices at the same time to seek double ups of medication).”

However, the *Primary Medical Care Policy and Guidance Manual (2017)* is very clear on this:

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)

the NHS Counter Fraud Authority Reporting Line: 0800 028 4060

filling in an online form at

<https://reportfraud.cfa.nhs.uk/reportFraud>

email at: generalenquiries@nhscfa.gsi.gov.uk

by post to the NHS Counter Fraud Authority, Skipton House, 80 London Road, London, SE1 6LH.

GP practices are required to follow a clear process when a registration application is refused.

4.10.1 If a practice refuses any patient registration then they must record the name, date and reason for refusal and write to the patient explaining why they have been refused, within a period of 14 days of the refusal

3 Website Analysis

As part of our core research HWMK carried out an online analysis of the patient registration information provided on every GP practice website in Milton Keynes.

Of the 28 GP practices in Milton Keynes:

- 23 websites state that identification is required in order to register at the practice. Many of these explicitly state that without two forms of identification - photographic proof of identity and proof of current address - your registration will be declined.
- 2 websites state that two forms of identification are required, and you may be declined if you are unable to produce this
- 1 website states that you should provide identification “if possible”
- 2 websites do not mention identification

Over 80% of GP Practice websites include registration information that is not in line with the Primary Medical Care Policy and Guidance. This oversimplification of the legislation risks perpetuating health inequality, as individuals who are need of primary medical care may be deterred from registering if they know they will not be able to provide identification.

Furthermore, 25% of websites stated that registration is only available at specific times. This guidance falls contrary to the national policy. The policy states:

4.7.1 Registration should be available to all patients every day rather than on particular days and throughout the practice's advertised opening hours.

4.7.2 Practices may find it helpful to let patients know the less busy times of the day when registration might be clearer

Whilst GP practices are within their rights to advise new patients to register at times when the practice is less busy, registration should not be limited to specific times of day.

4 The Rights to Healthcare Card

Groundswell, a registered charity which exists to enable homeless and vulnerable people to take more control of their lives, working with the Healthy London Partnership, had previously produced a 'My Rights to Healthcare' card. Recognising the value that this card could have in the local area, HWMK contacted Groundswell, who gave permission to develop our own Healthcare cards using the same wording.

The 'My Right to Access Healthcare' card states:

'I have the right to access treatment and register with a GP Practice.'

- *I do not need a fixed address*
- *I do not need identification*
- *My immigration status does not matter*

Information about Groundswell's 'My Rights to Healthcare Cards' can be found here: <http://groundswell.org.uk/what-we-do/health/my-right-to-healthcare-cards/>

The cards are designed to be carried with patients when they register at a GP. The card helps individuals understand and assert their rights to access Primary Care. The cards can also be handed to the receptionist to remind them of their obligation to register patients. A copy of the card is included in Appendix B.

Since September 2018 HWMK has distributed an estimated 1,250 cards to a wide variety of organisations across Milton Keynes including Probation services, Red Cross, Connections Support, organisations who are part of the MK Homelessness Partnership and Housing First, YMCA and Compass. One local Practice Manager has taken a number of cards so that these can be added to their practice's registration packs. Some local charities have also chosen to include the Healthcare cards in the support packs that they offer.

HWMK sent letters to all GP Practice Managers in Milton Keynes, in December 2018, encouraging them to act in line with the national policy. The letter also included information about the distribution of the Healthcare cards and our intention to carry out a Mystery Shopping exercise in early 2019 (See appendix C).

5 Mystery Shopping

Three HWMK volunteers conducted a Mystery Shopping exercise across Milton Keynes between January and March 2019, to explore the registration process first hand, whether barriers to registration were experienced and whether presenting the card helped the patient and reception staff open a dialogue about opening access to registration.

The selected volunteers were given extensive scenario training and were advised to carry out the exercise during the least busy hours at the practice. Mystery shoppers were provided with identification cards explaining who they were and what they were doing.

Mystery Shoppers requested to register at GP practices, offering the following scenario:

I have recently moved in to live with my relative at an address in the catchment area. All bills are in my relative's name. I do not drive and have never been abroad.

15 randomly selected GP practices were visited across the Borough. This accounts for over 50% of GP practices in Milton Keynes. Preliminary analysis of the data obtained in the 15 GP practices we visited highlighted that no new themes were being observed in the data collected. It was therefore established that research through the mystery shopping exercise had reached saturation point. As such, we are confident that the results of the Mystery Shopping exercise are applicable to GP Practices across Milton Keynes.

Of the 15 GP practices we visited:

- 11 practices refused to register the mystery shoppers
- 3 practices, having learned about the scenario were sympathetic towards the situation, and agreed to do their best to register them
- 1 GP Practice, having heard the scenario, agreed that the mystery shopper could register without identification

The Mystery Shopping exercise highlighted that most front-line staff at GP practices were not aware of their obligation to register people who are legitimately unable to produce identification, but state they live within the catchment area.

Our mystery shoppers reported that a small number of staff, when presented with the Healthcare card, recognised the card and appeared to be expecting Mystery Shoppers. However, most responded to the Healthcare card with confusion. They had no knowledge of the card and were not receptive to its presentation.



Responses to the Healthcare card included the following:

“those rules do not apply to this health centre”

“we have not signed up to this”

“the need for proof of address is even in our application form”

“the head doctor has specified it [the need for identification] as we have lots of non-English speaking residents and we need to be able to tie up their details accurately”

These responses are indicative of a limited understanding of the intricacies of the national policy. It does not appear that practices always have internal policies that inform staff of GP Practice obligations to operate within the Primary Medical Care Policy and Guidance that applies to all NHS GP Practices.

Our research informed our concern that there is a clear-cut process in GP Practices whereby all those who cannot produce identification must be declined registration.

It is important to note that throughout the exercise, mystery shoppers found the receptionists to be polite and helpful. For example, on numerous occasions mystery shoppers specifically noted that receptionists were sympathetic towards their situation, trying to help them think of other forms of identification they could obtain. A couple of receptionists agreed that patients could register if they had a letter from the person that they were living with, confirming their address. However, in general, whilst receptionists were sympathetic to their situation, they were unable to make reasonable exceptions based on an individual's situation. The risk to the public is that, in applying local Practice registration procedures too rigidly, practices are failing to comply with the national policy.

The mystery shopping exercise reinforced the findings from the website analysis regarding time slots for registration. Mystery Shoppers were informed at a number of visits that they could only register at specific times on specific days. At one GP practice the mystery shopper was offered the first registration appointment available, which was 28 days after going in to request to register.

6 Feedback from the Community

Whilst most people in Milton Keynes can easily register at a GP practice, our evidence suggests that there is a small section of our community that is being denied their right to access Primary Care through GP practices. This is a significant problem for those who are affected.

Utilising the power of our residential and professional community to spread the word and help us research the scale of the issue within vulnerable communities, and the general population, the distribution of the Healthcare card helped us to reach out beyond HWMK's outreach capacity.

Since October 2019 HWMK received 17 phone calls and emails either from or regarding individuals who are desperately trying to register at a GP. This included calls and emails from staff members at Probation, The Red Cross and Connections Support.

We found that individuals contacting us for support had were often experiencing a process of fighting for their rights to Primary Care, directly with the practice.

HWMK are aware that GP practices in Milton Keynes can decline registration to patients who are outside of their practice boundary. However, all those we have heard from stated that they were living in the catchment area of the GP practice they were trying to register with, but have been unable to provide evidence of this, including someone recently been released from prison and living in temporary accommodation. In a number of reports to us, people were able to supply proof of address within the catchment area and their NHS number, but were unable to provide photographic identification and were declined.

HWMK have also been informed on three separate occasions by individuals living on canal boats who experienced being unable to register with their GP because they do not have a permanent address. The national policy explicitly states that those living on a canal boat may be legitimately unable to provide documentation, and this should not be considered reasonable grounds to refuse them registration.

We also heard from a HWMK member to let us know that they had gone, with their spouse, to register with a new GP after moving to a different area of Milton Keynes. They took identification and the spouse was registered, but they themselves were refused as they were only able to provide proof of address in their spouse's name.

The information shared with us and our mystery shopping research, whilst not significant in number set against the MK population, was representative of vulnerable communities, professionals facing challenges to support vulnerable individuals and the general population. Our research indicates that any resident



has the potential to be affected and fall through the gaps in terms of access to Primary Care should they have challenges supplying identification, with particular risks to vulnerable individuals.

Of all those we spoke to, none reported that the GP had written to them explaining the reason for the refusal of registration, so that they were able to try to register with a Practice outside of their catchment area. HWMK are advising people that they should request this if they are refused registration.

During the project, a number of professionals have contacted us to inform us of vulnerable people they are supporting, and where they have been unable to register them with a GP. They have also reported to us that on a number of occasions the Healthcare card supported the successful registration of their clients.

“We primarily support people who have been sleeping rough into accommodation and part of this includes registering at a doctor’s surgery. Some practices have been very helpful and followed the legislation regarding ID, fixed abode, immigration status. However, some others have refused clients. If a support worker has been with the client at the time of registration enquiry we have used the Healthwatch cards which has resulted in registration going ahead. The cards have been really useful for both the client and us as they are enabling clients to register at the GP without our supervision which enables them to do this independently. They are invaluable and support workers carry one with them at all times.” Staff Member at Connections Support



7 Recommendations

Reflecting National Policy in Local Practice

- Healthwatch Milton Keynes recommends that GP Practices in Milton Keynes review their practice procedures to ensure that they fall in line with, and do not contradict Primary Medical Care Policy and Guidance.
- The Primary Medical Care Policy and Guidance policy highlights that patient registration is a complex issue. We recommend that Practice Managers ensure that national policy is not applied selectively in practice procedures.
- The Primary Medical Care Policy and Guidance must be understood and applied as a whole, and we recommend that Milton Keynes Clinical Commissioning Group (MKCCG) ensure practices comply with it and offer appropriate support to manage complex issues.

Accurate Information on GP practice websites

- Healthwatch Milton Keynes recommends that all GP practices in Milton Keynes ensure that the patient registration information on their website complies with the national policy. HWMK suggests the following wording:

Registering as a new patient:

Please bring one of each of the following forms of identification with you, if possible.

- *Proof of identification e.g. Passport, driving license*
- *Proof of current address e.g. Bank Statement, Utility Bill*

If you are unable to produce identification, but live within the catchment area, you will still be able to register.

If you are registering as a new patient, we would encourage you, where possible, to register between X and Y, when the practice is usually less busy.

Staff Training

- The role of the receptionist in the registration process is critical. Healthwatch Milton Keynes recommends that Practices provide further training to their teams, so that they feel empowered to make reasonable exceptions based on individual circumstances. Healthy London Partnership produced some useful training resources, aimed at helping receptionists



understand homeless peoples' experiences of accessing Primary Care, and highlighting the vital role that receptionists can play in changing this.
<https://www.healthylondon.org/resource/homeless-health-elearning/>.

Patient Registration Refusals

Healthwatch Milton Keynes recommends that when Practices refuse a patient registration they undertake the relevant record keeping and communication to the applicant, as outlined in the Primary Medical Care Policy and Guidance. If a practice does have reasonable grounds to decline a patient registration, then following this process will help ensure the patient understands why their application has been rejected.



8 GP Federation Response

Feedback from Milton Keynes GP Federation:

MKGP do welcome the Rights to Access and Health care review as this gives our members the opportunity to feedback back and continue to work with Health watch and patients positively. As in all matters in life not all is black and white. The issue of registering patients and seeking proof in identification is complex and although practices welcome the opportunity to standardise processes across MK, we are fully aware that each patient has individual needs and at times process needs to be adjusted to suit individuals

The Federation accepts that there is more our members could do to be open and clearer about the process of registering. There is a matter to be addressed at a wider level with NHSE and the CCG in regards to Information being shared to practices prior to the implementation of such changes and ensuring that practices are supported in understanding new guidance.

We provide regular training and development events for primary care staff and will be hosting vulnerable patient training soon for all admin and reception staff, at their request.

Prior to the training we are working with members and Healthwatch to develop standardised messages for websites and pathways for staff to follow when registering patients.

Members and MKGP have also raised a number of concerns with the CCG as to how best to address some of the wider issues related to patient registration.

- Primary Care Support England, the overarching body that registers patients on the national database, require various forms of ID to ensure patients are not registering at multiple practices fraudulently.
- System Online requires photographic Identification for patients to be able to register with practice online services. As we move towards to new GP contract Online services will play a key part in access to Health care. Our local Commissioning Support Unit, a NHS body that supports the CCG, has also been very strict in its request for ID.
- All practices in Milton Keynes, apart from Brooklands, have a practice boundary. These boundaries are to ensure patients receive and primary care staff can provide the best possible local services. Some services, such as Home visits, are not possible to provide for patients living far from a practice. So, in order to maintain the practice boundary reception staff need to ensure that address information is verified at the point of registration.



We support all patients' right to register and we all aspire to make registration made simple and safe. Supporting vulnerable and homeless patients.

We are partners in the MK Homeless Partnership and our Chair, Dr Nguyen, sits on their Board.

However, there are some wider issues that need to be taken in to account. MKGP and its members are committed to ensuring we work with Health Watch to support this.

In response to Health watch recommendations

1 – Reflecting National Policy in Local Practice

- We agree and are currently reviewing local guidance.
- We fully agree that patient registration is a complex issue, whilst we welcome standardised procedures. However there will always be a patient who requires a individual approach and process. The procedure of registration does not end with the practice. So, other NHS organisations need to have support in place for those that do not meet the standardised process.

Accurate Information on GP practice websites

- We agree and will work with members to update website information

Staff Training

- We agree that the role and training of reception staff is pivotal in delivering good services. Local practices do have access to the training recommended. Receptionists we have spoken to they have found the training informative and useful.
<https://www.healthylondon.org/resource/homeless-health-elearning/>.
- We recognise the need for further training and are hosting a training session for Reception teams on Vulnerable Healthcare

Patient Registration Refusals

- Primary Medical Care Policy and Guidance advises that if a patient registration is refused then the patient should be written to within 14 days with the reason for refusal. We are also required to make this information available to commissioners at their request.
- This information will be included in the pathway

May 2019



9 MK CCG Response



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MK3 6RT

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Web: www.miltonkeynesccg.nhs.uk

30 May 2019

Dear Maxine

Thank you for your report titled "My Right to Healthcare: GP Registration and Access", we thank Healthwatch in producing this report. The report has highlighted some interesting points which we welcome the chance to respond to and work with Healthwatch and our population to improve upon. However we must also balance the need for process against the need for keeping our patients safe too and we must always be mindful of this. We accept that this process is not clear for patients and would like to respond to the recommendations outlined in your report.

Reflecting National Policy in Local Practice

- Healthwatch Milton Keynes recommends that GP Practices in Milton Keynes review their practice procedures to ensure that they fall in line with, and do not contradict Primary Medical Care Policy and Guidance.

We will raise this within our annual practice visit programme and gather information from each individual practice on their registration procedures. Currently we are not aware of any practices who do not fall in line, however if concerns are raised to Healthwatch please advise the CCG in order for us to discuss them with the practice concerned.

- The Primary Medical Care and Guidance policy highlights that patient registration is a complex issue. We recommend that Practice Managers ensure that national policy is not applied selectively in practice procedures.

This will be discussed at the next Practice Managers forum that we attend highlighting the policy highlights.

- The Primary Medical Policy and Guidance must be understood and applied as a whole, and we recommend that Milton Keynes CCG ensure practices comply with it and offer appropriate support to manage complex issues.

This will be raised within our practice visit programme, however we have recently had an issue raised where Primary Care Support England (PCSE), the national organisation that registers patients on the national database, requested



a practice to provide proof of ID prior to processing the registration, this is often requested by PCSE to avoid patients registering at multiple practices and due to safety issues around the prescribing of medication, this issue has been raised separately to NHS England and we are awaiting their reply.

Accurate Information on GP Websites

- Healthwatch Milton Keynes recommends that all GP Practices in Milton Keynes ensure that the patient registration information on their website complies with the national policy with suggested wording.

The suggested wording will be circulated to all practices to utilise on the practice website, we will check via an audit that practices are giving correct information and any issues will be raised with the practice and at the practice visit.

Staff Training

- The role of the receptionist in the registration process is critical. Healthwatch Milton Keynes recommends that Practices provide further training to their teams, so that they feel empowered to make reasonable exceptions based on individual circumstances.

The CCG are currently rolling out a programme for receptionist and administration staff on customer service with the following outcomes:

- For each delegate to achieve a level of self-awareness, so their behaviour, thinking and service can be adapted to differing situations, ensuring a consistently excellent patient journey.
- The delegate will gain the skills to complete a customer service improvement plan (competence) at work, following the workshop. The areas it will cover are:
 - Patient registration
 - Confidentiality
 - Listening skills
 - Questioning skills
 - Patients with challenging behaviour
 - Waiting room management
 - Using an effective handover tool

In addition to the actions we have agreed to above, we will be sharing and discussing your report with the Primary Care Committee and also with our practices once it is published on your website.

Once again thank you for undertaking this report and we look forward to working with our member practices to commence tackling the issues that you have highlighted.

Yours sincerely



Deputy Director of Programme Delivery & Head of Primary Care
Milton Keynes Clinical Commissioning Group



10 Appendix A: Primary Medical Care Policy and Guidance manual (PGM)

As this is a document of over 400 pages, we have included the link so that readers can navigate to the policy from this report, and the Search term so that readers will be able to easily access the policy online at a later date.

<https://www.england.nhs.uk/publication/primary-medical-care-policy-and-guidance-manual-pgm/>

The search term *Primary Medical Care Policy and Guidance* will take you to the NHS page which contains this document as well as an overview of Primary Care Commissioning.

11 Appendix B: Healthcare Card



12 Appendix C: Letter to Practices

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healthwatch
Milton Keynes



GP Patient Registration



NAME
Practice Manager
SURGERY NAME
STREET ADDRESS
ESTATE
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POASTCODE

Dear NAME,

Healthwatch Milton Keynes is the local independent champion for people who use Health and Social Care services. Our mission is to be an independent organisation, providing an effective local voice for people in Milton Keynes, influencing and shaping Health and Social Care services to meet their needs.

It has recently been brought to our attention that residents in Milton Keynes who are unable to provide proof of address are experiencing barriers in registering with a GP. Section 4 of the Primary Medical Care Policy and Guidance Manual, GP Patient Registration Standard Operating Principles for Primary Medical Care¹ outlines the approach practices should take to enable equitable access to all.

We are calling on all Milton Keynes GP practices to ensure that they adhere to the Standard Operating Principles and that staff registering patients are appropriately trained to ensure residents don't face unnecessary barriers to accessing care or registering with a GP.

Healthwatch Milton Keynes has created a **Right to Healthcare Card** which outlines an individual's right to access a GP regardless of their immigration or residential status or are unable to provide identification.

We will be mystery shopping registration processes at GP practices across Milton Keynes to test responses to the **Right to Healthcare Card**.

We will send all practices a report following our activity and we look forward to collaborating with Practice Managers and Patient Participation Groups to resolving any barriers that are highlighted during this exercise.

Kind Regards,

Maxine Taffetani
Chief Executive Officer
Healthwatch Milton Keynes

<https://www.england.nhs.uk/publication/primary-medical-care-policy-and-guidance-manual-pgm/>



www.healthwatchmiltonkeynes.co.uk
Healthwatch Milton Keynes CIO registered charity number: 1166148

