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GP registration and NHS number Policy Brief

England, Scotland, and Wales - June 2021

Refugee and migrant communities, people experiencing homelessness, and Gypsy Roma and Traveller communities, have low levels of GP registration and are often incorrectly prevented from registering with a GP surgery¹. GP registration challenges have been compounded during the COVID-19 pandemic, as people have been dispersed from their normal source of healthcare, registration processes have moved online, and people seeking asylum and people experiencing homelessness have been temporarily accommodated in hotels and remote disused army barracks, making it difficult to access to access primary care service and the COVID-19 vaccine².

This policy brief explains the entitlement and access to primary care across the UK with references to existing guidance for primary care providers and resources for patients who face barriers to access healthcare.

How to register with a GP and get an NHS number? Patient registration guidance and resources

Everyone in <u>England</u>, <u>Scotland</u>, and Wales is eligible to register with a GP and receive primary care services free of charge, regardless of immigration status. This is because immigration status is not relevant for primary care, and anyone can register and use primary care services.

Some surgeries may ask to provide documents, such as proof of address, proof of identity or proof of immigration status, or an NHS number in order to register, but they should not refuse to register if these can't be provided. If individuals can't provide these documents, they should say that they don't have these documents but that they do live within the practice boundary and would like to register with the GP as a patient.

NHS England and the <u>British Medical Association</u> have published a guidance for doctors which states that if a patient is not able to provide identity documents, it is not reasonable grounds to refuse to register them. Individuals who experience problems when registering with a GP (if registering online and are required to provide documents) could email this guidance to the GP practice.

Registering patients are not required to complete the supplementary questions in the <u>English</u> <u>GMS1 registration form</u> relating to immigration status.

If a GP practice has refused to register, patients in England can call 0300 311 2233. Patients in Scotland and Wales should contact their local Health Board. Patients can also contact Doctors of the World on 0808 1647 686 (free phone number) for help registering with a GP.

DOTW's <u>Safe Surgeries initiative</u> provides resources, training and support for GP practices on how to ensure their services (and registration processes) is accessible to everyone in their community. The initiative has also published a <u>COVID-19 toolkit for general practice</u>.

https://www.doctorsoftheworld.org.uk/wp-content/uploads/2019/08/Registration-Refused-final.pdf; https://www.gypsy-traveller.org/wp-content/uploads/2019/03/No-room-at-the-inn-findings-from-mystery-shopping-GP-practices.pdf; https://groundswell.org.uk/wp-content/uploads/2018/10/NHS100012 More-than-a-statistic-Final-2017-1.pdf

² https://www.doctorsoftheworld.org.uk/wp-content/uploads/2020/07/covid19-brief-rna-report.pdf

To receive secondary care (hospital or community services) free of charge a person must be 'ordinarily resident' in the UK. Establishing whether a person is 'ordinarily resident' is complex, taking into consideration a person's immigration and residency status, and a number of exemptions exist. GPs make secondary care referrals on clinical grounds alone and the relevant NHS trusts will then assess the patient eligibility to receive the service.

NHS patients in the UK are allocated a unique patient identifier in the form of a 10-digit number. In England and Wales this is known as an NHS number, in Scotland, a Community Health Index (CHI) number and in Northern Ireland, a Health and Care (H&C) number).

In most circumstances this patient identifier is allocated at birth. However, new migrants will be given an identifying number when they register with a GP for the first time³. Migrant patients who have paid the Immigration Health Surcharge will have been allocated an NHS number when their visa was granted.

Although the NHS / CHI / H&C number has no role in entitlement to NHS services, it is required to book appointments for certain NHS services, for example COVID-19 vaccination appointments (see Doctors of the World's briefing on COVID-19 vaccinations for more details).

See below further guidance and resources specific to England, Wales, and Scotland.

England

NHS England has issued clear guidance to GP surgeries clarifying:

- Everyone is entitled to register with a GP surgery and receive free primary care services regardless of immigration status. Registration cannot be declined if a person does not have proof of ID, address, or immigration status.
- Practices should continue to register new patients during the pandemic, prioritising those with
 no fixed address, asylum seekers, refugees and people leaving custody. Delivery of
 applications for patient registration may be by any means, including post and digital (eg,
 scanned copy). Where a practice has online registration options, a supporting signed letter
 from the patient, posted or emailed to the practice, is acceptable to complete the registration.

Primary Care Support England (PCSE) has <u>guidance for GP practices</u> on how to register a person with no fixed abode (see: '<u>How do I register a homeless patient?</u>') and a migrant patient without an NHS number (see: '<u>How do I get an NHS number if I am unable to trace the patient?</u>'). This guidance will also assist patients and support organisations to fill in registration (GMS1) forms correctly.

For registering patients, NHS England has produced <u>'GP access cards' to help people without documents to register with a GP in England</u>. Individuals could show the card to the GP receptionist when they go to register. 'GP Access' cards can be obtained from local charities, foodbanks, local Healthwatch, or from Doctors of the World. NHS England also has specific guidance on GP registration for <u>refugees and asylum seeking</u> (and <u>undocumented migrant</u>) <u>patients</u>, <u>Gypsy</u>, <u>Roma and Traveller communities</u>, and <u>people experiencing homelessness</u>.

³ In England, once the GP registration application has been <u>processed by PCSE</u> (4-11 working days) the patient will receive a medical card, which includes their NHS number, at their home address and the GP practice will receive the NHS number for the patient via the GP links.

Public Health England's <u>Migrant Health Guidance</u> explains that personal data of patients such as name and address can only be shared with the Home Office in two specific conditions:

- To check a person's immigration status to inform an assessment of their eligibility for free NHS treatment at secondary care services.
- To inform Home Office about overseas visitors who have NHS debt. For services provided on or after 6 April 2016, data is shared if the debt is £500 or more and has been unpaid for 2 months or more. This debt may affect a person's future immigration application.

Data is not shared with the Home Office immigration department when patients access an NHS service that is free for everyone, regardless of immigration status. This includes GP services and COVID-19 testing, treatment and vaccination services.

Sources:

- NHS England Primary Medical Care Policy and Guidance Manual (19.09.2019)
- NHS England Standard Operating Procedure: General practice in the context of coronavirus (COVID-19)' 24.12.2020)
- NHS England 'Standard operating procedure: COVID-19 local vaccination services deployment in community settings' (14.01.2021)
- NHS England 'What is an NHS number?' (10.12.2019)
- Primary Care Support England 'A Guide to Patient Registrations' (22.01.21)

Wales

NHS Wales encourages everyone to register with a GP. NHS Wales 111 offers a find a GP service and provided further information on registering with a GP. NHS Wales states that GPs can only refuse registration when there are sufficient grounds for doing so; when the patient live outside the area covered by the GP, or when the GP practice have closed their patient list. GP practice should provide an explanation if they refuse a registration.

NHS Wales has guidance for asylum seekers and refugees which clarifies that <u>all medical services are</u> <u>available for free for asylum seekers and refugees</u>. The Welsh Government's <u>Sanctuary</u> website also provides information about health and wellbeing of asylum seekers and refugees, including registering with health services.

Sources:

- NHS Wales 'GPs Frequently Asked Questions'
- NHS Wales GP contract

Scotland

NHS Scotland has published a circular that introduces <u>patient registration guidance</u> for healthcare providers in Scotland. The guidance clearly states that:

- Anybody in Scotland may access primary care services at a GP practice without charge.
- No documents are required to register with a GP. The inability by a patient to provide identification or proof of address is not considered reasonable grounds to refuse or delay registering a patient.
- A verbal request to join a practice is acceptable and some patients may require assistance to complete the form.
- Overseas Visitors can register on the same basis as ordinary residents.

- The inability by a patient to provide identification or proof of address is not considered reasonable grounds to refuse or delay registering a patient.
- The arrangements that have been set out in this guidance should also be followed for people who may have no address or find it difficult to share their address. This may be for a variety of reasons, including homelessness, being part of a nomadic community such as Gypsy/Travellers, or for personal security purposes. If necessary practices can use an agreed address, such as a Homeless centre, the practice address or 'No Fixed Abode' in order to process the patient registration.
- It is not the responsibility of primary care services to check the eligibility of patients for charging in secondary care settings. A patient's nationality is therefore not relevant in giving people entitlement to register as NHS patients for primary medical care services.

Prospective patients can find the nearest GP practice on <u>Scotland's service directory website</u>. They can obtain the Application Form (GPR) to Register Permanently with a General Medical Practice (PCA2018(M)01) from their local GP practice or download it from the <u>NHS Inform website</u>. Patients can download this registration form, complete it, and then email it to the GP practice. A verbal request to join a practice is acceptable and it is recognised that some patients may require assistance to complete the form.

In Scotland, individuals can also use Access to Healthcare - GP Registration Cards. These cards supportive for anyone who needs to register at a new GP practice as well as the practice reception staff. GP registration card is a business card which sets an individual's rights to healthcare in Scotland. GP Z card is a six sided 'Z card' which provides the same information as above, as well as more detail including how to make appointment and what to do if individuals cannot register with a particular GP practice.

Sources:

- NHS Scotland 'Patient registration: A guide for healthcare providers of general medical services in Scotland' (26.09.2018)
- NHS Scotland 'Healthcare for refugees and asylum seekers' (05.05.2020)