

FOR HEALTH IN HACKNEY SCRUTINY COMMISSION

MARCH 12 2019

SUBMISSION FROM **HACKNEY KEEP OUR NHS PUBLIC** FOR THE REVIEW OF *DIGITAL FIRST AND ITS IMPLICATIONS FOR GP PRACTICES*

We are writing to you about concerns we have about the Review itself, as well as about the targeting of Hackney residents for *GP at Hand* expansion.

I. The Review

We appreciate the wide range of information and references included in the 'Draft Proposal for a Scrutiny Review'. However, we are surprised that Hackney residents/patients/users of the NHS are not included in the list of Stakeholders (p. 25 of papers).

But it appears under Methodology (10.3 p 26) that some residents are to be included in the review, but only those already using the online 'engagement portal' Hackney Matters. By definition, this is likely to include mainly the 'younger demographic' referred to in 3.5 page 20, who may well be the overwhelmingly fitter digital users of *GP at Hand*. This hardly suggests a balanced survey of NHS users.

We propose that groups like our own, a well informed group of residents concerned about privatisation and financialisation of the NHS, are in future included as stakeholders for changes discussed that come within our remit.

We include our concerns and our proposals for action about *GP at Hand* below and we would like to be kept informed about how the Scrutiny Commission intends to use the results of their extensive Review.

II. Our Concerns about *GP at Hand*

Our concerns are focused on the incursion of the corporate/private sector into the NHS, and the increasing financialisation of the NHS. Your papers include many of our concerns, but our response focuses on the expansion of *GP at Hand* within Hackney.

1. Surveillance and data capture by corporates

As the digital model develops, Babylon software will need access to patients' electronic medical records in order to improve itself. Without proper regulation, this will engender major risks to patient confidentiality and security. Access to our confidential information which can then be used in complex ways for profit is mentioned briefly in 3.6. We would like to emphasise to Scrutineers the increasing concerns that civic society - and we at Hackney KONP - have about this. ⁱ

2. Risk of destabilisation of the GP system in Hackney through the expansion of a digital private sector provider which would have the worst impact on the poorest, sickest and most immobile. This would be the result of cherry picking patients by *GP at Hand* ⁱⁱ; and of the digital exclusion of many Hackney residents with the greatest health needs. ⁱⁱⁱ

The *GP at Hand* commercial model threatens to destabilise NHS general practices. Loss of income from C+H CCG in addition to reducing C+H NHS GP core funding leaves local GPs with less money but sicker patients. Planned funding changes may further disadvantage NHS GPs

who wish to use medical, organisational and technical expertise to develop their own online platforms.

3. As patients, **we are concerned about the lack of continuity of GPs; lack of face to face consultation; and lack of coordination** with other Hackney services .

4. **Misleading advertising:** people are not clear that patients would have to deregister from their usual GP when signing up. This was only corrected after the ASA complaint was upheld.

5. **Safety concerns:** Babylon triage software is embedded in *GP at Hand's* service, and the diagnostic app and service privately available alongside *GP at Hand*. *GP at Hand's* seismic rollout, with Babylon piggybacking its way into the NHS, is without independent scrutiny, evidence or evaluation. Is this safe?

There is evidence that straightforward real-world use of Babylon app has shown very serious basic flaws in the programme. It is not licensed as a diagnostic medical device. We believe this presents a danger to patients.

III Actions we would like to see

1. You will doubtless be aware that in July 2018, the CCG in Birmingham rejected Babylon's application to expand its *GP at Hand* with a centre in Birmingham. ^{iv} We urge you to use your influence on the Hackney CCG to do the same.
2. We would like Hackney Council to use its public communication channels to publicise concerns about *GP at Hand* so that Hackney residents are aware of the risks, including of signing off from their own practices.
3. We would like you to take up the issue that Sec of State for Health, Matthew Hancock breached the ministerial code in promoting *GP at Hand*. ^v

ⁱ See *The Age of Surveillance Capitalism* by Shoshana Zuboff 2019

ⁱⁱ Both the RCGP and BMA criticised the scheme for "cherry picking" younger, healthier patients, leaving other GP practices to deal with patients requiring more complex care. See <http://nhsforsale.info/private-providers/private-gp-companies/babylon-health.html>

ⁱⁱⁱ *A Digital NHS?*, a 2016 report by The King's Fund noted that 'the people with the greatest health needs are often less likely to have the technology and skills to engage with and benefit from digital services'. <http://nhsforsale.info/private-providers/private-gp-companies/babylon-health.html>

^{iv} <http://www.pulsetoday.co.uk/news/gp-topics/it/ccgs-block-babylons-expansion-of-gp-at-hand-to-birmingham-on-safety-grounds/20037085.article>

^v <https://www.gponline.com/hancock-endorsement-gp-hand-broke-ministerial-code-says-labour/article/1520101>