

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



**I have the right to register and
receive treatment from a GP practice**

I do not need a fixed address.

I do not need identification.

Anyone in England can see a GP.



**If I have any problems I can call 0300 311 2233
If I need more information I can visit www.nhs.uk/register**

- I may need help filling in forms.
- I may need help reading and understanding.
- I would like to speak to someone confidentially.

Introduction

According to the Primary Care Policy and Governance Manual for GP practices, there is no regulatory requirement to prove identity, address, immigration status or an NHS number in order to register as a patient. There is also no contractual requirement for GPs to request this.

Proof of ID is only a requirement if the patient wants to have online access to their medical records. This is due to the sensitivity and confidentiality of the information.

Following our [report on GP registration, published in May 2021](#), Richard Bull, Programme Director - Primary Care for NHS North East London Clinical Commissioning Group (NEL CCG) sent out a letter to all GP practices in Hackney, highlighting how a policy of asking for documents leads to a denial of healthcare for some patients.

In his letter Richard Bull highlighted the importance of patient registration without passport or proof of address. He quoted from the Primary Care Policy and Governance Manual which states “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”. Richard Bull also stated that “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”.

We were asked by Richard Bull to repeat the review in six-months time. We focused on checking for any changes or improvement in the new patient registration process and requirements at Hackney GP practices, following the recommendations.

Registration is key to an individual’s overall health outcomes as it ensures early diagnosis, and treatment. This has been highlighted by the Covid-19 pandemic and the need to ensure all eligible residents are given the opportunity to be vaccinated.

We regard requesting of proof of address or ID for registration, which could likely result into an individual who does not have the required document been denied

registration as a significant concern. We are also aware that this approach is a barrier that is limiting some local residents, especially people who are vulnerable including those who are homeless, migrants and asylum seekers and those with learning disabilities from accessing primary care services. The impact of this could potentially lead to worse health outcomes, health inequalities and the inappropriate and ineffective use of NHS services (for example the high use of A&E by vulnerable groups consequently causing high financial cost for NHS) in the long run.

Methodology

In October 2021 our staff and volunteers called all 39 GP surgeries in Hackney to enquire about GP practices' new patient registration processes. All calls were made after 9:30am, as staff and volunteers were mindful of patients' appointment booking times, which is normally between 8 - 9:30am.

Staff/volunteers placing the calls introduced themselves and made it clear that they were calling from Healthwatch Hackney. To ensure consistency in the way information was collected, a data collection sheet was used and the same questions were asked across all GP practices.

The questions asked were:

What is the process for registering as a new patient?

Can a resident walk into the practice to register using a hard paper copy of the registration application?

Does the resident have to live within your catchment area?

Does the resident have to provide any proof of ID or proof of address?

If yes: What if they do not have any of these documents?

Some of the calls were answered within 5 minutes, two calls were answered after 17minutes, one was answered after 11 minutes, one after 12 minutes and one answered after 27 minutes.

In November 2021 we made a follow up call to all GP practices in Hackney to request clarification about the reason new patients are required to provide proof of ID.

During these calls, we were concerned to hear the contradictory responses from the different reception staff at the same GP practice regarding the registration requirements which made this reporting difficult. GP practices should ensure reception staff provide consistent messages on the NHS registration process.

Acknowledgement

We would like to thank all the receptionists at the practices for their time and contribution. Every member of staff that we spoke to was very friendly and helpful.

We would also like to thank our volunteer Vernita Dauda for her excellent work on this project.

Key findings

Despite all the efforts made since March this year, including the NEL CCG letter sent to all GP practices, we found that:

18% of the GP practices in Hackney still require proof of identity
and
26% still require proof of address

Nine out of the 39 GP Practices have been consistent in not requesting proof of address and/or ID during registration or after registration.

During the research it was also found that receptionist at some GP Practices have poor awareness and understanding of their practices' new patient registration process. They were not confident about the information they provide and had to go back and forth, seeking advice from a colleague.

Calls to surgeries to clarify their position in November showed inconsistency in the information provided by the different members of the staff at the same GP practice.

This raises a concern as receptionists are frontline staff and the first point of contact for patients seeking information.

It is important to note that a quarter of Hackney's population have English as their second language and as a result may experience a language barrier. This could affect their ability to access needed information and services. Encountering a receptionist that unable to confidently provide clear information about the practice registration process will be an additional barrier.

Recommendations

Following the report in March 2021, and our last review in October 2021, we are suggesting the following recommendations to suggest improvement to new patient registration process.

- 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 use to verify registrations with the Patient Demographic service, so that practices are not penalised for any discrepancies in patient details.
- Under the oversight of the NEL CCG Primary Care Commissioning Committee NEL CCG convene a working group of itself, the City and Hackney GP Confederation and the City and Hackney Local Medical Committee to carry out a focused campaign to ensure all GP practices operate in line with NHS Guidance on patient registration to ensure all barriers are removed for migrants registered with a GP.
- 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.
- 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.
- GP practices to provide or develop an inclusive registration policy, have posters across the surgery or information leaflets with registration process
- GP practices consider signing up to [Doctors of the World's Safe Surgeries initiative](#) to tackle the barriers faced by many migrants in accessing healthcare.

Proof of Identity (ID)

- 26 out of the 39 GP Practices asked for proof of identify - photo identification such as a passport or driving licence. However, 19 of the 26 practices required proof of ID only if the patient wanted access to the online Patient Access platform, where they can have access to medical records, book GP appointments, order repeat prescription.
- 4 practices had a no 'No ID, NO registration' policy, providing little or no alternative for people without ID.
- The receptionists of three of the GP practices requesting proof of ID or/and address said that discretion could be used, or management would be consulted for advice, in situations where no proof could be provided.
- Two practices offered 14 days and 3 months' temporary registration for those without proof of ID, or address, however, if the ID is not provided within the timeframe, the patient would be removed from their list.
- One practice asked for a supporting letter from a third party organisation (Social worker, or charity group).
- **One practice was strictly refusing registration for asylum seekers or undocumented and homeless people.**

During the March research one practice (Gadhvi Practice) said they would register an individual without proof of address and ID but the individual would have to provide one as soon as possible. This was within the NHS guidelines that someone should be registered and the paperwork requested later if necessary. **However**, in October, the practice had a No proof, No registration policy. We were told that the proof was needed for verification purposes.

These approaches contradict and breaches NHS England Registration guidelines.

Hackney is one of the most diverse boroughs in London, home to people with different immigration, financial and social status. According to 2015 Indices of Deprivation Hackney was listed as the eleventh most deprived local authority in England with the poverty rate of 36% well over the London average poverty rate of 27.5%. Therefore, while it is relatively easy for some of its residents to provide the required documents, others cannot afford to provide these (especially photographic ID) because of the financial cost involved.

Poverty and the lack of access to primary health care, due to the lack of affordability of id documents could potentially lead to poor health outcomes for poorer local residents.

Proof of Address

Ten practices out of 39 asked for proof of address as a requirement for registration.

Some practices asked that the proof of address such as utility/telephone bills, bank statement should be within the last 3 months, whilst other asked that it was within 6 months. The receptionists at these surgeries said this was done to ensure that the individual(s) resides within the practice catchment area, to make home visits easier for doctors and nurses.

One GP practice said that a letter from a neighbour or a long-term local resident could be used as a proof of address.

One GP practice does not ask for proof ID but asks for the individual's NHS number or previous GP details and proof of address. This is deterring some people from registering. In particular, newly arrived asylum seekers and migrants who have never accessed primary care services before and therefore do not have an NHS number or a previous GP.

The reasons given may sound reasonable, however it is important that all Hackney GP Practices adhere to NHS Registration guidelines to ensure uniformity in registration process and equality of access for all residents across the borough. The mandate clearly specifies that lack of paperwork is not an acceptable reason -for a GP practice to use to refuse registration.

Online and hardcopy registration

Online registration was available at 38 out of 39 practices.

The Greenhouse surgery was operating walk-in registration only.

All 39 practices were offering in-person (paper form) registration.

One surgery receptionist mentioned that online registration is mainly encouraged. This is because the hard copy form is longer and needs more details. It is not clear why this cannot be amended to bring it into line with the newer E-registration form.

Comparison

Review March 2021	Review October 2021
23 (59%) out of 39 GP practices asked for proof of identity	7 (18%) out of 39 GP Practices asked for proof of ID.
27 (69%) out of 39 GP practices asked for proof of address	10 (26%) out of 39 GP Practices asked for proof of address.

Information on GP websites

We carried out a detailed review of all GP practices websites between June and July 2021. Our aim was to increase the accessibility and quality of the information available on GP practice's website and improve patient relations with these practices.

The COVID-19 pandemic underlined the importance of publishing information on websites clearly and accessibly, as contact by phone and in person was restricted. Also publishing clear information on practice websites can help reduce some of the pressures on GP practices which have arisen during the pandemic.

One of the areas we looked at was the **new patient registration process and requirements information**. A key finding of the review related to *was that despite* our report on [GP registration](#) published in May 2021 and the letter from the Clinical Commissioning Group sent to all GP practices in Hackney, 18 out of 38 practices reviewed were still requesting proof of ID and/or address as a requirement to prove eligibility to register as a patient, on their websites.

Following our recommendations 13 out of the 18 practices reviewed amended the new patient registration requirement information on their website and added the following message:

"We may ask to see proof of ID and/or address in order to ensure we register you with the correct details - however we will always register you even if you do not have these documents".

However, five practices did not respond to our recommendations.

To read the full report go to [GP website review: Improving online information about GP services, saving time for patients and surgery staff](#).

Summary of practice websites in respect of patient registration

GP practice name	New patient registration process during the review	Results of our recommendations
Allerton Road Medical Centre	No proof of ID or address is required. Only online registration option is given.	Registration in person (hard copy new patient registration form) should be promoted.
Athena Medical Centre	No proof of ID or address is required.	No action was needed
Barretts' Grove Surgery	Proof of ID and address is required.	Patient registration requirements reviewed and amended.
Barton House Group Practice	Proof of ID is required only for access to medical records.	No action was needed
Beechwood Medical Centre	No proof of ID or address is required. PDF registration form is the only option which makes it difficult to complete.	New patient online registration form implemented.
Broke road surgery	Proof of ID and address is required. Only PDF registration form available.	No action was taken
De Beauvoir Surgery	Proof of ID and address is required.	Patient registration requirements reviewed and amended.
Elsdale Street Clinic	No proof of ID or address is required.	No action was needed
Granwich Road Surgery	Proof of ID and address is required.	Patient registration requirements reviewed and amended.
Healy Medical Centre	Unclear message regarding what documentation is required.	Patient registration requirements reviewed and amended.
Kingsmead Healthcare	Proof of address is required. Proof of ID is required for Online Services.	Patient registration requirements reviewed and amended.
Latimer Health Centre	Proof of ID and address is required.	No action was taken
London Fields Medical Centre	No proof is required when registering online, but proof is needed when registering at the practice.	No action was taken
Lower Clapton Group Practice	No proof of ID or address is required.	No action was needed
Queensbridge Group Practice	No proof of ID or address is required.	No action was needed
Richmond Road Practice	No proof of ID or address is required.	No action was needed
Rosewood Practice	No proof of ID or address is required.	No action was needed
Sandringham Practice	Proof of ID and address is required.	Patient registration requirements reviewed and amended.
Shoreditch Park Surgery	Proof of address is required.	Patient registration requirements reviewed and amended.

GP practice name	New patient registration process during the review	Results of our recommendations
Somerford Grove Practice	No proof of ID or address is required.	No action was needed
Southgate Road Surgery	No proof of ID or address is required.	No action was needed
Spring Hill Practice	Proof of ID and address is required. No pre-registration requirement when registering online during Covid.	Patient registration requirements reviewed and amended.
Stamford Hill Group Practice	No proof of ID or address is required.	No action was needed
Statham Grove Surgery	Proof of ID and address and NHS number is required.	Patient registration requirements reviewed and amended.
The Clapton Surgery	No proof of ID or address is required.	No action was needed
The Elm Practice	Proof of ID and address is required when registering at the practice. No proof is required when registering online.	Patient registration requirements reviewed and amended.
The Cedar Practice	No proof of ID or address is required.	No action was needed
The Dalston Practice	No proof when registering online but proof is needed when registering at the practice.	No action was taken
The Gadhvi Practice	No proof of ID or address is required.	No action was needed
The Heron Practice	No proof of ID or address is required.	No action was needed
Hoxton Surgery	Proof of ID and address are required.	Patient registration requirements reviewed and amended.
The Lawson Practice	Proof of ID and address are required. No pre-registration requirement when registering online during Covid.	Patient registration requirements reviewed and amended.
The Lea Surgery	Proof of ID and address is required.	Patient registration requirements reviewed and amended.
Nightingale Practice	No proof of ID or address is required.	No action was needed
The Riverside Practice	No proof of ID or address is required.	No action was needed
The Wick Health Centre	Proof of ID and address is required.	No action was taken
Trowbridge Surgery	No proof of ID or address is required.	No action was needed
Well Street Surgery	No proof of ID or address is required.	No action was needed

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> 19 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>.

Why you 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.

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.

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

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.

“The City and Hackney Primary Care Enabler Board considered Healthwatch Hackney’s report at its meeting on 13th of January 2022.

It was noted that this was a follow up report to the one published in March of last year and it was evident that much improvement had taken place, which was in part aided by Healthwatch Hackney’s work on improving the information content on GP practice websites.

Prior to the meeting City and Hackney’s director for primary care contacted all ten practices which in the report were still indicated as requiring either proof of address or ID or both. All practices contacted confirmed that proof of ID and address were not needed for registration and were extremely disappointed that on this occasion Healthwatch Hackney had been told the wrong thing.

Practices said that they regularly put on training and reminders for their staff on registration requirements. However, due to the pandemic turnover of reception staff, sickness rates and use of temporary staff were higher than ever which meant it was harder to ensure that staff were saying the right thing all of the time.

Practices would continue to regularly remind existing staff of the correct registration requirements as well as induct new staff.

The City and Hackney GP Confederation would also put on additional training for all practices.

Healthwatch Hackney was thanked for another excellent and helpful piece of work.”

Summary of practice registration requirements

Y=Yes; N=No;

MARCH 2021 review			OCTOBER 2021 review		Changes made after our report in March 2021
Practices	Proof of Address for registration	Proof of ID for registration	Proof of Address for registration	Proof of ID for registration	
Allerton road Medical Centre	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Athena Medical Centre	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Barret's Grove Surgery	No Proof of ID/Address, No Registration		No proof of ID or address needed		Improvement made
Barton House Group Practice	Y	Y	Y	Y	No changes made
Beechwood Medical Centre	Y	Y	No proof of ID or address needed		Improvement made
Brooke Road Surgery	Y	Y	No Proof of ID/Address, No Registration		No changes made
De Beauvoir Surgery	Y	Y	No proof of ID or address needed		Improvement made
Elsdale Street Clinic	Y	Y	No Proof of ID/Address, No Registration		No changes made
Cranwich Road Surgery	Y	Y	No proof of ID or address needed		Improvement made
Healy Medical Centre	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Kingsmead Healthcare	Y	Y	Y	N	Some improvement made
Latimer Health	Y	Y	No proof of ID or address needed		Improvement made
London Fields Medical Centre	No proof of ID or address needed for online registration but for in-person registration		No proof of ID or address needed		Improvement made
Lower Clapton Group Practice	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Queensbridge Group Practice	No proof of ID or address needed		N	Y	Negative change
Richmond Road Practice	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Rosewood Practice	Y	Y	No proof of ID or address needed		Improvement made

MARCH 2021 review			OCTOBER 2021 review		Changes made after our report in March 2021
Practices	Proof of Address for registration	Proof of ID for registration	Proof of Address for registration	Proof of ID for registration	
Sandringham Practice	N		No proof of ID or address needed		No changes needed
Shoreditch Park	N		No proof of ID or address needed		No changes needed
Somerford Grove Practice		Y	No proof of ID or address needed		Improvement made
Southgate Road Surgery	Y	Y	No proof of ID or address needed		Improvement made
Spring Hill Practice	Y	Y	No proof of ID or address needed		Improvement made
Stamford Hill Group Practice	Y		Y	N	Some improvement made
Statham Grove	No Proof of ID/Address, No Registration		No proof of ID or address needed		Improvement made
The Clapton Surgery	Y		Y	Y	No changes made
The Elm Practice	No Proof of ID/Address, No Registration		No proof of ID or address needed		Improvement made
The Cedar Practice	No registration for asylum seekers or undocumented migrants		No proof of ID or address needed		Improvement made
The Dalston Practice	No Proof of ID/Address, No Registration		No proof of ID or address needed		Improvement made
The Gadhvi Practice	Registration can be done without ID/Proof of address but needed to be provided immediately after		No Proof of ID/Address, No Registration		Negative change
The Heron Practice	Y	Y	No proof of ID or address needed		Improvement made
The Hoxton Surgery	Y	Y	Y	N	Some improvement made
The Lawson Practice	Y	Y	Y	N	Some improvement made
The Lea Surgery	Y	Y	No proof of ID or address needed		Improvement made
The Nightingale Practice	No proof of ID or address needed		No proof of ID or address needed		No changes needed
The Riverside Practice	No proof of ID or address needed		No proof of ID or address needed		No changes needed
The Wick Health Centre	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Trowbridge Surgery	No proof of ID or address needed		No proof of ID or address needed		No changes needed
Well Street Surgery	No Proof of ID/Address, No Registration		No Proof of ID/Address, No Registration		No changes made