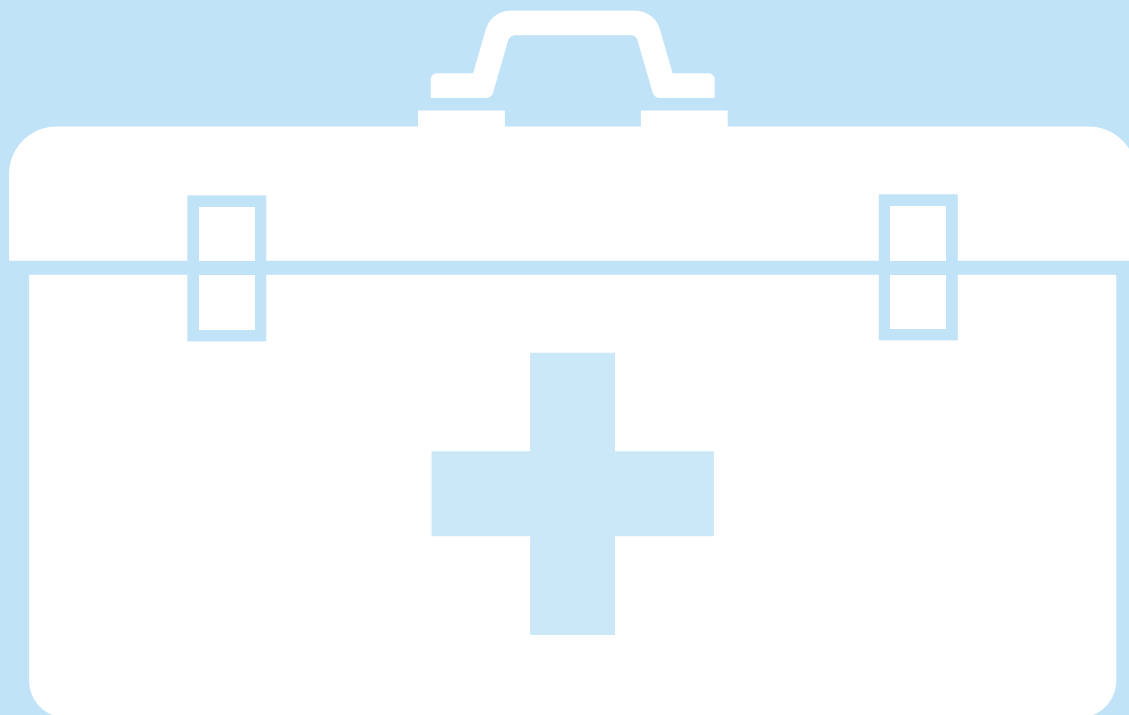




# SAFE SURGERIES TOOLKIT



7 STEPS TO HELP MAKE YOUR  
GP PRACTICE SAFE FOR EVERYONE



## SAFE SURGERIES

This toolkit is a resource for GP practices who want to provide a **welcoming** environment for everyone in their community and an **equitable** service for all of their patients. It has been developed by Doctors of the World (DoTW) UK with the aim of addressing the particular barriers to primary care faced by migrants in vulnerable circumstances, including refugees and survivors of trafficking.

All of the advice given complies with NHS England guidance. Taking the steps suggested also helps ensure that practices uphold their patients' human right to health, protected by international law and reflected in the Care Quality Commission (CQC)'s FREDA principles for Fair, Respectful, Equal, Dignified and Autonomous care.

### WHY SAFE SURGERIES?

Everyone living in the UK is entitled to register and consult with a GP. It means we can prevent and treat illness early and create a healthier society for everyone.

At our London clinics, **DoTW UK helps almost 2,000 people every year who have been unable to access NHS services.**

On average, our patients have been in the UK almost 6 years, without ever having seen a GP. Most of these are migrants in vulnerable circumstances, who are often prevented from registering with a GP by administrative, language or other barriers.

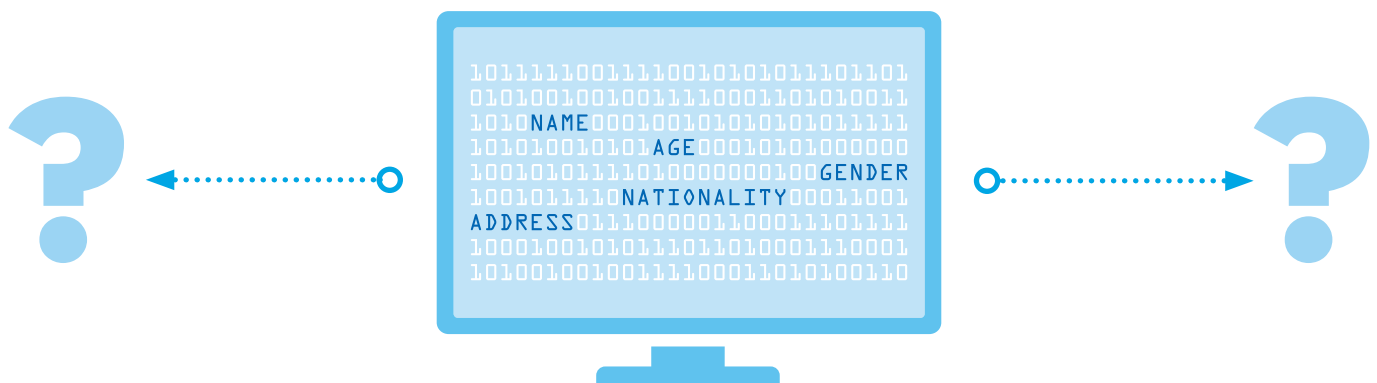
They include pregnant women, survivors of trafficking and people who have fled war, unable to get the healthcare they need.

Until recently, the Home Office was using information held in primary care records to track down migrants. This made many of our patients too frightened to register with a GP.

While this policy has changed, data-sharing can still take place if patients access secondary care and there are no legal safeguards against non-clinical information being shared with the Home Office for immigration enforcement.

DoTW UK has developed a range of practical materials developed to support GP practices become Safe Surgeries.

For more information and to join the Safe Surgeries community, visit [doctorsoftheworld.org.uk](http://doctorsoftheworld.org.uk).





## WHAT CAN WE DO TO HELP?

GP practices can take concrete steps, both at reception and in consultations, to improve equity of access to their services.



**1**

Don't insist on proof of address documents



**2**

Don't insist on proof of identification



**3**

Never ask to see a visa or proof of immigration status



**4**

Do what you can to protect patient information



**5**

Use an interpreter, if needed



**6**

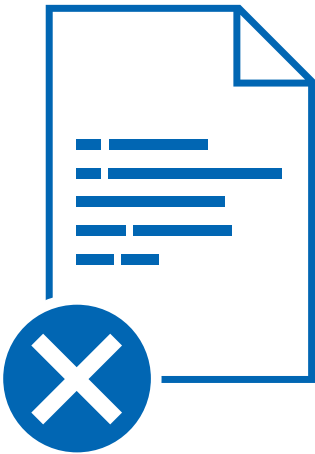
Display posters to reassure patients that your surgery is a safe space



**7**

Empower frontline staff with training and an inclusive registration policy

## STEP 1



### Don't insist on proof of address documents

While most people have no problems providing proof of address, some people, such as those living in unstable accommodation or those who are street homeless, do not have any documents with their name and address on them.

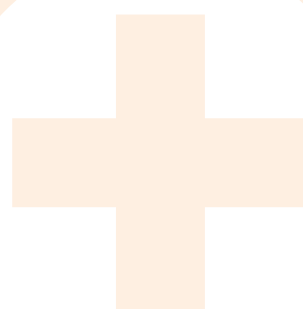
Unfortunately, many GP practices wrongfully refuse to register patients without proof of address - it is one of the most common reasons that our patients are turned away. NHS England guidance states that if a patient says that they live in the practice area but cannot produce proof, they shouldn't be refused registration on that basis.

### Don't insist on proof of identification

While many people carry some form of proof of identity, many people in vulnerable circumstances don't have any ID. This can include British citizens, but particularly applies to migrants. They may have been trafficked into the UK without documents, lost them during a long journey or have sent them to the Home Office as part of an immigration or asylum application.

Most GP practices ask for proof of identity when registering a new patient and many turn away patients if they can't provide it. However, NHS guidance is clear that, like proof of address, no patient should be refused registration because they don't have ID and there is no contractual requirement for GP practices to verify identity.

## STEP 2



**STEP 3****Never ask to see a visa or proof of immigration status**

Everyone in England, regardless of their immigration status is entitled to free primary care and to register with a GP. When registering a patient, don't ask about their immigration status or to see proof of it. This is not needed for registration and asking for it might intimidate or discourage some patients.

NHS England's form for registering new patients (the GMS1 form) now includes 'supplementary questions' about immigration status. However, BMA guidance confirms that patients don't have to complete this section if they don't want to. Even if they do complete it, practice staff should not ask for any documentation to prove the information the patient provides.

**Do what you can to protect patient information**

Some migrants may be afraid to share their home address or immigration status when registering with a GP practice, fearing that it could be used by the Home Office to track them down. There is good reason for this: until recently, primary care records were being used for immigration enforcement without patient or GP knowledge or consent. While this policy has changed, data-sharing can still take place if patients access secondary care and there are no legal safeguards against non-clinical information being shared with immigration enforcement.

If a patient is concerned about this, you should register them with an alternative address; this could be the practice address, or the address of a mosque, church or community centre where post might reach them. In doing this, you are not breaching any NHS guidance or regulations.

If the Home Office contacts you about a patient, you are under no legal obligations to share information. You should only do so if there is a court order, a public health risk or it's in relation to a serious crime (immigration offences aren't serious crimes).

**STEP 4**

## STEP 5



### Use an interpreter, if needed

If a patient has difficulty communicating in English, an interpreter should be used both at reception and in consultations. Easy access to telephone interpretation services is therefore essential, but Google Translate might also be useful for exchanges of basic information. If the patient is accompanied by an English-speaking friend or relative, consider carefully whether allowing them to join a consultation might prevent the patient from speaking openly.

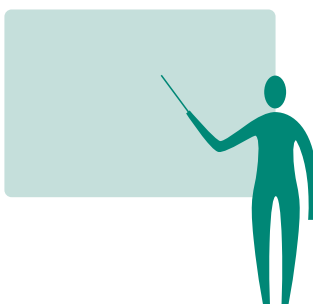
## Display posters to reassure patients that your surgery is a safe space

Having our Safe Surgeries posters on display in your waiting area is an easy way to let patients know that your practice is a safe space (download the posters at [bit.ly/safesurgeries](https://bit.ly/safesurgeries)). As many migrants are not aware of their healthcare entitlements, our posters are also a useful educational tool. They are available in a number of languages, so you should choose the languages most common to your area. If we don't yet offer the languages you need, email [safesurgeries@doctorsoftheworld.org.uk](mailto:safesurgeries@doctorsoftheworld.org.uk). We'll see what we can do!

## STEP 6



## STEP 7



### Empower frontline staff with training and an inclusive registration policy

Becoming a Safe Surgery might mean making practice-wide changes to ensure that policy and staff skills support the above Steps. If your registration policy involves asking new patients for proof of address or ID, it also needs to include a pathway for those who do not have these documents or are frightened to give them. Our poster for reception staff is a helpful resource to support them and ensure that the practice complies with NHS guidance.

Safe Surgeries training can also help clinical and non-clinical staff understand healthcare entitlement and how they can support patients in vulnerable circumstances. For more information, email [safesurgeries@doctorsoftheworld.org.uk](mailto:safesurgeries@doctorsoftheworld.org.uk).



## QUESTIONS

### What if a patient needs a referral to secondary care?

In England, some migrants, including refused asylum seekers and undocumented migrants, will be charged for secondary care (hospital or community services). While it's important that GPs make referrals on clinical grounds alone, it can be helpful to understand charges they're likely to face.

Refugees, asylum seekers and survivors of trafficking are entitled to free secondary care. So are survivors of torture, female genital mutilation, and domestic or sexual violence, if their treatment relates to their experience of violence. Some services are free for everyone, including treatment given in A&E, diagnosis and treatment of specific infectious diseases, and contraception.

All urgent and immediately necessary treatment must be provided even if a patient can't pay; it will be billed for later. Maternity care is always considered immediately necessary. The charging rules are complex; for more information, have a look at our resources on the next page.

### What if the Home Office contacts us for information about a patient?

If someone working for the Home Office contacts you for details about a patient, ensure that no information is given without first discussing it with the patient's GP.

GPs are under no legal obligation to provide information to the Home Office, unless there is a court order, a public health risk or it is in relation to a serious crime (murder, manslaughter or rape).

Immigration offences are not considered serious crime. Consideration of any request should be informed by the GMC confidentiality guidance.

### What if I'm worried a patient isn't getting the care they need?

For more information on how to support individual patients, contact DoTW UK on:

**020 70789629** or

**[clinic@doctorsoftheworld.org.uk](mailto:clinic@doctorsoftheworld.org.uk)**

We run a drop-in clinic and advice line for people who are having difficulty accessing the healthcare they need.

## Key guidance

**NHS England Standard Operating Principles on GP Registration** (from page 144) 2017.

Available at: <https://tinyurl.com/GPRegNHSE>

**CQC guidance on refugees, asylum seekers and vulnerable migrants**

Available at: <https://tinyurl.com/GPRegCQC>

**BMA guidance on registration of overseas visitors** 2018

Available at: <https://tinyurl.com/GPRegBMA>

## Rights-based resources

**Healthcare access guide for people seeking asylum.** Equality and Human Rights Commission. 2019

**Case studies: facilitating access to healthcare for people seeking and refused asylum.** Equality and Human Rights Commission. 2019

## DoTW UK

Go to [doctorsoftheworld.org.uk](http://doctorsoftheworld.org.uk) for the following reports:

**Healthcare entitlement in England** 2018

**Closing the Gaps in Healthcare Access: United Kingdom** 2017


**Registration Refused: A study on access to GP registration in England** Yearly since 2015

## Join our network of Safe Surgeries

To join our growing network of Safe Surgeries, or for more information and handy resources, visit our website:

[doctorsoftheworld.org.uk/safe-surgeries](http://doctorsoftheworld.org.uk/safe-surgeries)

Email: [SafeSurgeries@doctorsoftheworld.org.uk](mailto:SafeSurgeries@doctorsoftheworld.org.uk)

 Follow us @DOTW\_UK

## Want to spread the word?

Use our Safe Surgeries peer-to-peer training resources if you're interested in raising awareness in your workplace:

[doctorsoftheworld.org.uk/train-your-peers](http://doctorsoftheworld.org.uk/train-your-peers)



# SAFE SURGERIES