



Friends Families and Travellers  
Community Base, 113 Queens Road  
Brighton  
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Rt Hon Matt Hancock MP  
Secretary of State  
Department of Health and Social Care  
39 Victoria Street  
London SW1H 0EU

20<sup>th</sup> March 2019

Dear Matt Hancock,

### **Access to primary care for Inclusion Health groups**

We write to you to highlight a recent piece of research carried out by Friends Families and Travellers which finds that almost half of GP practices surveyed in England are routinely refusing to register patients at high risk of poor health because they do not have a fixed address or do not have proof of identity<sup>i</sup>.

The first guiding principle of the NHS is that it provides a comprehensive service, available to all and the NHS England Patient Registration Standard Operating Principles for Primary Medical Care says, “When applying to become a patient there is no regulatory requirement to prove identity, address, immigration status or the provision of an NHS number in order to register”<sup>ii</sup>. Yet when mystery shoppers from Friends Families and Travellers contacted 50 GP practices across England posing as a person from the Traveller community who didn’t have a fixed address nor proof of identity they found that:

- 24 out of 50 GP practices would not register their mystery shopper.
- Despite this, every GP practice was rated ‘good’ or ‘outstanding’ by the Care Quality Commission for their work with ‘People whose circumstances may make them vulnerable’.

Whilst this piece of research focusses on the experiences of over 80,000 nomadic Gypsies and Travellers (around a quarter of all Gypsies and Travellers), this is not a problem unique to Gypsies and Travellers. Groups experiencing similar problems include asylum seekers and refugees, people in contact with the criminal justice system, homeless people, vulnerable migrants and people fleeing from domestic violence. Alarming, many of the communities most at risk of poor health in England are those which are experiencing the greatest difficulties in accessing healthcare.

Lack of progress in this area has been a source of international scrutiny, in fact, the UN Committee on the Convention on the Elimination of All Forms of Racial Discrimination<sup>iii</sup>, the UN Committee on Economic, Social and Cultural Rights<sup>iv</sup> and the UN Committee on the Rights of the Child<sup>v</sup> have specifically called on the UK government to address this issue.

Given the severity of the issue and the wide range of stakeholders from across the health and social care system who play a part in this, the report calls for a taskforce to be set up to lead and drive forward the recommendations outlined in the report, which include that:

1. NHS England should develop a clear understanding of why GP practices may be reluctant to register certain patients and ensure that appropriate incentives and deterrents are in place to address this. This might be through funding mechanisms linked to the Quality and Outcomes Framework and/or the Carr Hill Formula and should be explicit in the GP Contract.
2. The Care Quality Commission should redesign the 'People whose circumstances may make them vulnerable' section of the inspection report. Together with GPs, inspectors, voluntary sector organisations and patient experts, they should develop specific and measurable indicators to be regulated, name the specific groups covered in this section and specific actions GP practices should be taking to achieve a 'good' or 'outstanding' rating for all 'vulnerable' communities.
3. In light of the restrictions which prevent the Care Quality Commission from mystery shopping GP practices, the Department of Health and Social Care should commission independent organisations to mystery shop GP practices assessing issues around access either at a national scale or at CCG level.
4. NHS England should develop a mandatory national Inclusion Health training and communication strategy to ensure all GP receptionists and practice managers are aware of their responsibilities to patients with no fixed address, no identification or no proof of immigration status.

We would be happy to discuss our concerns and proposed ways forward in more detail and are keen to hear how the Department will seek to address this issue.

Yours sincerely,

Sarah Mann  
Director  
Friends Families and Travellers

Kathy Roberts  
CEO  
Association of Mental Health Providers

Myk, Zeitlin  
Advisory Service for Squatters



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<sup>i</sup><https://www.gypsy-traveller.org/wp-content/uploads/2019/03/No-room-at-the-inn-findings-from-mystery-shopping-GP-practices.pdf>

<sup>ii</sup><https://www.england.nhs.uk/south/wp-content/uploads/sites/6/2018/01/patient-registrations.pdf>

<sup>iii</sup><https://undocs.org/en/CERD/C/GBR/CO/21-23>

<sup>iv</sup><http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=4sIQ6QSmIBEDzFEovLCuW3XRinAE8KCBFogOHnZ%2fvuCC%2bTxEKAl18bzE0UfQhJkxxOSGuoMUxHGypYLjNFkwxnMR6GmqogLJF8BzscMe9zpGfTXBkZ4pEaigi44xqiL>

<sup>v</sup><http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhskHOj6VpDS%2f%2fJgg2Jxb9gncnUyUgbnuttBweOlyfyYPkBbwffitW2JurgBRuMMxZqnGgerUdpixij3uZ0bjQBOLNTNvQ9fUIEOvA5LtW0GL>