

Briefing note: GP at Hand in Wales

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Background

GPC Wales has received several queries from Welsh practices regarding Babylon's GP at Hand service considering their recent expansion into Birmingham, thereby increasing their proximity to the Welsh border. The organisation had previously been blocked from subcontracting its digital service from their original base in London over concerns regarding patient access to immunisation and screening services¹, but approval was provided by NHS England on Tuesday 12 February. This sets a precedent for Babylon to expand its offering to other areas of England.

The GP at Hand service has satellite clinics which are subcontracted from the main GP at Hand practice in Hammersmith. Patients can see a GP at a physical clinic or receive digital communications with doctors through the service's app. This arrangement will continue with the service expansion; all patients will continue to be registered with the Hammersmith practice, with the consequent flow of funding.

The BMA has criticised Babylon GP at Hand's service for not providing patients with "*placed-based care delivered by doctors embedded in their local communities*". Additionally, a review of the service on behalf of NHS England and Hammersmith and Fulham CCG² in October 2017 highlighted that its operating model risked "*creating inequality in service provision*" and funding, in that patient self-selection will likely provide for a younger, healthier and more mobile practice population using the service.

Can Welsh patients choose to register with a GP at Hand practice?

Not at the current time, although this seems to depend on the patients' location and postcode.

The GP at Hand website does not currently allow residents with Welsh postcodes to begin the process of transferring to a practice offering their online services. Residents with English postcodes that are not currently served by GP at Hand are asked if "*they work within 40 minutes travel time of one of their clinics*" (i.e. London and in future Birmingham). This feasibly *could* allow patients registered with a Welsh GP practice in border areas but with 'English' postcodes to register with GP at Hand.



Both sets of GMS regulations (the 2015 English regulations and 2004 Welsh regulations) provide for patients to be able to register with a GP practice out of the area in which they reside if a practice list is open. Practices can refuse an application on certain reasonable grounds, including that the patient does not live in the practice area.

The Protocol for Cross-border Healthcare Services³ determines that operational responsibility for commissioning services for a patient is determined by the patient's GP registration rather than residency. Welsh residents who are registered with an English GP or English-registered GP are considered 'English' patients. For these patients, the respective English CCG has commissioning/healthcare planning responsibility and the LHB legal responsibility. The reverse is also true. This situation mainly occurs when patients in border areas have to register with their geographically nearest surgery, despite it being across the border from their place of residence.

Could Babylon GP at Hand operate in Wales?

Theoretically, GP at Hand could apply to hold a GMS contract from a local health board, as a limited company with a Director being a registered General Medical Practitioner.

Realistically, it is unlikely that the Welsh Government's stance on the role of private companies in healthcare and strategic aims regarding locally delivered care within the Primary Care Model would allow this situation to transpire.

Additionally, exceptions within the English GMS regulations pertaining to registration of out of area patients⁴ allow GP at Hand to not provide the full range of services expected (such as home visits) within the GMS contract. The equivalent Welsh regulations do not contain this exception and therefore it would be impractical for GP at Hand to offer their current operating model in Wales.

¹ BMJ (2018) "GP at Hand: NHS England upholds CCG's objection to planned Birmingham expansion";362:k3899

² NHS England & Hammersmith & Fulham CCG (2017): "Clinical Review of Dr Jefferies and Partners GP at Hand service" www.hammersmithfulhamccg.nhs.uk/media/120062/PCCC-Item-6-Appendix-C-GP-at-Hand-Clinical-Review.pdf

³NHS England "Information on Cross-Border Healthcare for the NHS in England and Wales" www.england.nhs.uk/ourwork/part-rel/x-border-health/

⁴ BMA: "Patient Choice Scheme and out of area registrations" www.bma.org.uk/advice/employment/gp-practices/service-provision/out-of-area-registered-patients