GP PRACTICE REGISTRATION PROTOCOL

Children and Young People (0–18 years)

1. Purpose

To ensure that all children and young people are registered safely, lawfully, and without inappropriate barriers, while meeting safeguarding duties and NHS contractual requirements.

2. Scope

This protocol applies to:

- **All children aged 0–18 years**

- Permanent and temporary registrations

- Online and paper registrations

- Proxy access requests linked to registration

3. Legal & Policy Framework

- Children Act 2004 – duty to safeguard and promote welfare

- NHS England patient registration guidance

- Data protection and confidentiality law

- Gillick competence principles

- NHS online services proxy access guidance

4. Core Principles

- **No child must be refused registration** because of a lack of ID, address, or documentation.

- Safeguarding takes precedence over administrative completeness.

- Practices should be curious, not obstructive, where information is missing or unclear.

- Registration and proxy access are separate processes and must be assessed independently.

5. Registration Process

5.1 Who Can Register a Child

- A parent or adult with parental responsibility should normally register the child.

- Ideally, the registering adult should also be registered at the same practice (to support identity matching and safeguarding).

- **Legitimate exceptions must be accepted**, for example:

  o Parents serving in the armed forces and registered elsewhere

  o Looked-after children

  o Children living with relatives or guardians

  o Children registering alone due to family circumstances

Registration **must still proceed** even if the adult is not registered at the practice.

5.2 Proof of Identity & Parental Responsibility

Where possible, staff should request (but not insist on):

- Child's proof of identity (e.g. birth certificate)

- Evidence of parental responsibility or guardianship (e.g. birth certificate, court order)

Important:

- Lack of documentation must not delay or prevent registration.

- Any uncertainty should trigger safeguarding consideration, not refusal.

5.3 Children Registering Alone or With a Non-Responsible Adult

If a child:

- Registers alone, or

- Is accompanied by an adult without clear parental responsibility,

Then:

1. Register the child.

2. Inform the Practice Safeguarding Lead.

3. Record concerns and consider whether further checks or referrals are needed.

5.4 Temporary vs Permanent Registration

- Temporary registration should be used only where genuinely appropriate.

- Temporary registrations must be reviewed regularly.

- Where the child is likely to stay more than **3 months**, permanent registration should be considered.

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6. Safeguarding Actions Post-Registration

Following registration, practices should:

- Arrange a new patient health check (where appropriate).
- Record:
  - Main carers and contacts
  - Previous GP details
  - School or nursery
  - Health visitor or social worker involvement (if known)
- Escalate concerns according to local safeguarding procedures.

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7. Proxy Access (Online Services)

7.1 General Rules

- Proxy access is **not automatic**.
- It must be requested and assessed separately from registration.
- Only adults **with parental responsibility** may be granted proxy access for children under 16.

7.2 Age-Based Approach

- **Under 11:** Proxy access is usually granted, unless safeguarding concerns exist.
- **11–15:**
  - The child's capacity and consent must be considered.
  - Proxy access may be limited or reviewed.
- **16+:**
  - Proxy access usually stops automatically.
  - The young person must explicitly consent to ongoing proxy access.

7.3 Safeguards for Proxy Access

Before granting proxy access, the practice may:

- Verify ID for both child and adult

- Confirm parental responsibility

- Consider safeguarding risks

- Consider the child's wishes and understanding

Proxy access **must be withdrawn or restricted** if:

- It poses a risk to the child

- The child objects and has capacity

- There are safeguarding concerns

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8. Children of Removed or Violent Patients

- If an adult is removed from the practice list, **the child's access to care must not be compromised**.

- Risks should be assessed individually.

- The child may remain registered even if the parent is removed.

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9. Staff Responsibilities

- **Reception/administrative staff:**
  - Register first, question later
  - Escalate concerns promptly

- **Safeguarding Lead:**
  - Review complex or high-risk cases
  - Advise on proxy access and registration anomalies

- **Clinicians:**
  - Assess capacity and consent where required

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10. Documentation & Record Keeping

- All decisions (especially exceptions) must be:
  - Clearly documented
  - Justified with safeguarding rationale

- Proxy access decisions must be recorded separately in the clinical system.

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11. Review

This protocol should be reviewed:

- Annually, or

- Following updated guidance from **NHS England**, LMCs, or safeguarding boards.

References

1. **Care Quality Commission**

   Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

   o Regulation 12: Safe care and treatment

   o Regulation 13: Safeguarding service users from abuse

   o Regulation 17: Good governance

   o https://www.cqc.org.uk/annual-report-and-accounts-202223/who-we-are-and-what-we-do?utm_source=chatgpt.com

2. **NHS England**
   Patient Registration Guidance

   https://www.england.nhs.uk/about/what-we-do/?utm_source=chatgpt.com

3. **NHS**
   GP Services for Someone Else – Parent and Guardian Proxy Access for Children
   – Guidance on parental responsibility, consent, capacity, and safeguarding
   Link: https://www.nhs.uk/nhs-services/gps/gp-services-for-someone-else-proxy-access/parent-and-guardian-proxy-access-for-children/

4. **Wessex LMCs**
   Patient Registration Guidance – Registering Children
   – Safeguarding expectations and handling registrations without documentation
   Link: https://www.wessexlmcs.com/guidance/patient-registration-2/

5. **Doctors of the World UK**
   Safe Surgeries – New Patient Registration Policy (July 2023)
   – Template policy supporting inclusive, non-discriminatory GP registration
   – Confirms that lack of ID, address, or immigration status must not be a barrier
   Link:
   https://www.doctorsoftheworld.org.uk/wp-content/uploads/2023/07/DOTW-Safe-Surgeries-New-Patient-Registration-Policy.pdf

6. **General Medical Council (GMC)**
   0–18 Years: Guidance for All Doctors
   – Consent, capacity, and confidentiality for children and young people https://www.gmc-uk.org/professional-standards/the-professional-standards/0-18-years/about–the-guidance

7. **Information Commissioner's Office (ICO)**
   Guide to the UK General Data Protection Regulation (UK GDPR)
   – Children's data rights and confidentiality obligations Link: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/children-and-the-uk-gdpr/ ICO