



England

Primary Care Commissioning
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Dear Colleague,

Winter Plans and Arrangements for Primary Medical Care Services during the Christmas and New Year Period

Each year your Clinical Commissioning Group (CCG) has responsibility for ensuring capacity exists across the system to manage demand without causing undue pressures on any part of the system, particularly in A&E. It is NHS England's responsibility to ensure patients have confidence in the availability of their primary care services, including Primary Medical Care, over the Christmas and New Year period. We collate information from all Primary Care Contractors: Dentists, GPs, Pharmacists and Opticians, which is incorporated into the CCG plans.

Please be aware that Wednesday 24th December 2014 and Wednesday 31st December 2014 are considered normal working days and we expect therefore all practices to be open as normal. All our partner health and social care agencies are working on this basis.

In order to plan appropriately, we require information about your practice opening times, detailing availability for telephone access and face to face appointments. Please find attached a spreadsheet for your practice to complete.

This needs to returned by email to nhscb.lon-sth-pcc@nhs.net by the 14th November 2014.

You will see that if a patient cannot speak to your Practice Receptionist during Core Hours (08:00-18:30 Monday to Friday, excluding Bank Holidays) over the holiday

period, you will need to confirm what arrangements are in place to deliver your contractual obligations.

Those practices that provide Extended Hours on Wednesday 24 or 31 December, may wish to move these hours to another day within the week, where this is part of your broader plans to manage expected surge in demand over this period.

Whilst the Area Team recognises that the GMS Contract (clause 46) and the GMS Contract Regulations (Regulation 20) regarding the provision of core and essential services during “core hours” is not a “doors open” requirement, these provisions do impose a contractual responsibility on the Contractor for patient care during this period. A/PMS contractors will need to reference their own contractual obligations to determine their requirements to patient care.

This means that the practice retains responsibility for ensuring that the care provided during core hours is appropriate to meet the reasonable needs of your patients. It is not acceptable to close the doors and rely on an answer machine message advising patients to contact another provider where no prior arrangements have been made (e.g. contact 111 or attend A&E)

If the practice is “doors closed” during core hours, then patients need to have absolute clarity about how to access essential services. As a minimum, you will need to have a system in place so that patients can access GP services, including urgent care, either by ringing the surgery and:

1. Being able to talk directly to a clinician to ascertain how they can access services if they need to;
2. An answer-phone message signposting the patient to an on-call GP for the practice. If this is part of a service commissioned by the CCG (e.g. using the OOH service in-hours,) then this must be with prior written agreement with both the provider and the CCG commissioner of that service.

NHS England does not feel that practices can reasonably claim patients receive a service that meets their reasonable needs from a sub contracted provider, unless that alternative provider has access to the patient’s record if required to assist the consultation. Where this is required, the practice is expected to have robust contract arrangements in place, which include appropriate governance provisions, clearly detailing each party’s responsibilities in relation to the delegation of clinical care.

Please note that Paragraph 69 of Schedule 6 of the contract regulations requires a practice to notify NHS England of their proposal to sub-contract. Paragraph 69(5) of Schedule 6 provides for NHS England to object to that proposal. NHS England will review a practice’s proposals, to ensure they give assurance that its planned sub-contracting arrangements provide access to essential and additional medical services throughout core hours in case of emergency. Where assurance is not provided, NHS England will not be able to accept the proposal.

GP OOHs providers have previously expressed concern where practices do not enter into contractual arrangements in regard to early closing of general practices on these days and the potential impact on them. Given the pressures that Out of Hours providers already face during this period, it is not a reasonable or sustainable service option.

Please note that these standards apply to any practice not opening at 08:00 and/or closing its doors before 18:30, Monday to Friday excluding Bank Holidays.

If these arrangements are not in place or, if tested they fail, this may amount to a breach of your contract and will be dealt with accordingly

To support CCG winter plans, NHS England's communication plans over the Bank Holiday period will reiterate to members of the public that GP services are available during core hours, and that A&E services are not the default.

As you will appreciate, Primary Care Services are part of a much wider health system that includes the Out of Hours service, Community Teams, the Ambulance Service and Acute Service. Each service is interdependent on the other. Thank you for your continued support, hard work and commitment to providing high quality, safe services to NHS patients.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Sturgeon', written in a cursive style.

David Sturgeon
Head of Primary Care
South London Area Team

Appendix A – Best Practice: Preparation checklist for bank holiday periods

- Plans are in place to ensure the identification of high risk community based patients and to profile their care management over the extended holiday period appropriately
- The communication channels should be operational
- The telephone divert arrangements are updated for the bank holidays.
- Third party call handling divert arrangements are updated – where used and are successfully operational
- Ensure that any changes to access times are clearly advertised on NHS Choices/practice website/in practice. If the practice uses a pre-recorded message when patients telephone, you may wish to consider using this to remind patients about changes for the holiday period.
- Ensure the availability of sufficient anticipated repeat medications.
- Check Business Continuity Plans are up-to-date, particularly ensuring that contact details for local health organisations are correct.