



NHS Bradford City and NHS Bradford Districts CCG's position statement with regard General Practice opening hours

1. Background:

The former Bradford and Airedale PCT issued a position statement for practices in relation to the practice opening times. As a result of the Bradford CCG's taking on full delegated rights for commissioning primary medical services the CCG's would like to reiterate this existing position statement.

The aim is to ensure that we have consistently of access applied to all practices (with the exception of extended access service at Hillside Bridge where the core opening hours are 2.00pm to 8.00pm 365 days a year)

The original position statement was presented to YORLMC for consideration at the NHS BA/YORLMC liaison meeting held 19 May 2010. At that meeting it was resolved that YORLMC considered NHS BA's Position Statement relating to practice opening hours to be acceptable.

2. Definition of Core Hours:

In the GMS, PMS and APMS contracts used within Bradford Districts and Bradford City CCG's "core hours" means the period beginning at 8.00am and ending at 6.30pm on any day from Monday to Friday except Good Friday, Christmas Day or bank holidays.

3. Provision of services within core hours:

By issuing this position statement the CCG's are not introducing new or changing any existing contractual requirements, the GMS, PMS and APMS contracts already make clear that:

The Contractor must provide essential and additional services at such times, within core hours, as are appropriate to meet the reasonable needs of its patients, and to have in place arrangements for its patients to access such services throughout the core hours in case of emergency.

4. Local agreements:

Whilst the contracts require practices to have in place arrangements for its patients to access services throughout the core hours in case of emergency and to meet their reasonable needs, the core hours defined can be agreed individually with PMS practices and included in a separate schedule of the Agreement. This allows local negotiation and agreement of hours when the practice is allowed to be closed during core hours. Bradford Districts and Bradford City CCG's would normally only expect this to be applied for protected learning time or where as part of a local PMS negotiation a practices has extended their core opening hours.

5. Open reception:

The position of Bradford Districts and Bradford City CCG's is that **practices will ideally be open at all times** during core hours.

“Open reception” means that patients are able to come into the practice building and deal with a receptionist in person, for example to gain access to a clinician for urgent or emergency care or assessment, to pick up a prescription or make or cancel an appointment. It does not mean that a surgery or clinic has to be running at that time however; patients who present in person in need of emergency care should expect to be able to access appropriate care through self presentation.

6. Protected Learning Time (Referred to locally as “Practice Based Learning (PBL)” and “Protected Learning Time (PLT)”):

In accordance with our CCG learning and development frameworks practices should currently close for a minimum of twenty hours per annum for protected learning time.

Ideally, even during PLT, a patient should be able to self present by attending reception to access care in an emergency situation. Relying on patients accessing care by telephone alone is not ideal. Not all patients have access to a phone and may therefore present at the practice in person. The position of Bradford Districts and Bradford City CCG's is that it is preferable for patients presenting in person not to be met by a locked door as this does not allow access to services in case of emergency.

However, we accept that there will be times when a practice wishes to include all staff in learning events and as such wish to close reception during PLT. In this instance practices are required to clearly advise patients how to access services during this time and consideration given to how a patient without a telephone will access care.

7. Access to a clinician:

The CCG's accept that there may be occasions when a GP or suitably qualified clinician is not on the premises, however practices are still responsible for patients during core hours even if there is no clinician present on the premises (thus practices are still required to have arrangements in place for patients to access services in case of emergency). We would therefore still expect clinical advice to be accessible, for example by telephone through the 'on call' GP. Using the earlier example of a person self presenting, the receptionist would be able to access the GP by phone on their behalf, hence meeting the practices contractual requirement in this regard.

8. Branch Surgeries:

The CCG's accept that some practices have branch surgeries which have shorter opening hours, and this is acceptable, as long as at least one of the practice's premises are open through the core hours.

9. Extended Hours

A number of practices in both CCG's offer extended hours through the Extended Hours Directed Enhanced Service (DES). The DES guidance states that:

Extended hours access must be provided on a regular basis in full each week including providing sickness and leave cover and should also ensure that its patients are aware of any cancellation of



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extended hours sessions, which should normally be discussed and agreed with NHS England in advance, including any arrangements for re-provision.

As both Bradford City CCG and Bradford Districts CCG have delegated responsibility for primary medical care commissioning, any changes to the extended opening hours should be agreed with the relevant CCG. The guidance states that commissioners:

Are obliged to consider any proposals for the arrangements of extended hours access put forward by a practice in accordance with the time limits and exceptions detailed below. This consideration should not be delayed unreasonably nor should commissioner agreement to such proposals be unreasonably withheld. Consideration does not have to be given by commissioners, nor do decisions have to be made where:

a) the practice has not submitted a written proposal within 28 days of the commissioner offer to enter an arrangement under the DES directions or;

b) the practice has not provided any information requested by the commissioner in order to make a decision as to whether the proposal to enter into arrangements under the DES directions meets its requirements.

When a bank holiday, Christmas Day, Boxing Day, New Year's Day or Good Friday occurs on the day which the practice would normally offer extended hours, the practice may wish to request a move of these hours to another day within the period. This must be done in writing at least 28 days in advance of the proposed date to the respective CCG and a written decision from the CCG will be returned to the practice.

10. Sub contracting arrangements:

Whilst access to services during core hours remains a contractual responsibility for each contract holder we accept that for operational reasons some practices choose to make arrangements to sub contract provision at certain times. Commonly referred to as 'wrap around', this usually applies to periods such as 8.00am to 8.30am or 6.00pm to 6.30pm. In instances where contractors wish to make arrangements for care for their patients to be provided by an alternative provider our preference is that reception remains open. If the practice does close during this period we expect practices to be clear to patients about how they access services. Our judgement regarding whether patients are clear about how to access services will be made by considering reported patient experience, complaints and reports. This will influence any changes to future position statements.

11. In summary:

Bradford Districts and Bradford City CCG's expect practices to demonstrate compliance with their contractual requirements by having open receptions through which patients can access care during core hours 8.00am to 6.30pm. An exception will be made for closures during agreed PLT time and wrap around periods as long as practices clearly advise patients how they access care during this period.

12. For practice consideration:

Practices are encouraged to consider the implications of this position statement and take any relevant action, this may include:



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- Dissemination of information; to ensure practice managers, GPs and relevant staff members are aware of the CCG's position with regard interpretation of primary care contracts in the context of core hours, opening hours and expectations regarding patient access
- Review opening hours; has the practice assessed their current provision and made any necessary adjustments to opening hours and staffing levels to ensure contractual requirements are met?
- Review of information on NHS Choices re opening hours; is it up to date and are patients aware of opening hours (including extended opening)
- Review of PLT; does the practice maintain a record of hours closed for PLT which would enable them to demonstrate, if asked, that this amounts to minimum of 20 hours per annum in line with CCG policy.
- Review of patient information. Are patients clear about how to access services if the practice reception is closed, for example during PLT or wrap around period

If a practice has any concerns regarding their ability to meet their contractual requirements with regard opening hours, or any other issue, they are encouraged to contact a member of the primary care team to discuss, and where appropriate, agree an action plan and timescale to address issues raised.