

# Checking Professional Registrations Policy

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Endorsing Body:	Joint Policy Forum	
Governance or Assurance Committee	Staff Governance Committee	
Implementation Date:	November 2025	
Version Number:	6	
Review Date:	November 2028	
Responsible Person	Nurse Director	



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Distribution:	NHS Lanarkshire's Public website

CHANGE RECORD						
Date	Author	Change	Version No.			
August 2011	F. Dodd	Amended to support NHS Lanarkshire policy format, as well as updating of the contact details for the professional bodies	2			
March 2015	F. Dodd S. Friel	Updated	3			
Feb 2018	F. Dodd S. Friel	Updated in required timeframe	4			
May 2018	Risk Dept	GDPR statement added into section 3 and updated name of Current data protection legislation Act	4			
October 2018	F. Dodd	Policy reviewed for inclusion in NHS Lanarkshire website, EDIA revised and typographical errors resolved	4			
May 2020	K. Torrance	Extended until May 2022 (COVID-19)	4			
April 2022	R Hibbert for S Friel	Review date amended pending full review	4			
July 2022	L Axford, M Russell	Removed paperwork refs, clarified roles. responsibilities Reflects SWAG guidance- failure to produce a registration certificate	5			
March 2025	M Russell L Russell M McGahey M Fraser A Campbell	Amendment to highlight the Registrants Responsibilities in notifying line manager and HR Clarification on pay and action if registration lapses. Introduction of Workforce Monitoring Process Amendment to Recruitment Process Amendment to Failure to Provide Evidence of Current Registration	6			





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### **Policy for Checking Professional Registrations**

### 1. <u>Introduction</u>

The employment of staff by NHS Lanarkshire in the capacity of a registered professional whose names are included in the register maintained by the appropriate Professional Organisation (HCPC, GMC, GDC, NMC and GPhC)

No person shall be employed by NHS Lanarkshire in a registered professional role without being registered by the appropriate professional organisation and this registration having been checked.

Registered staff are required to practice using the same name as is held on their professional register, this to allow patients/public and NHS Lanarkshire to confirm a practitioner's eligibility to practice without difficulty.

This policy therefore applies to:

- Staff employed by NHS Lanarkshire
- Staff employed in the private and voluntary sector and who provide services on NHS Lanarkshire's behalf to patients and clients
- Staff supplied to NHS Lanarkshire by employment agencies

### 2. Aim, Purpose and Outcomes

To outline the professional responsibilities of a range of staff in ensuring all registered professionals have a current and appropriate professional registration in order to safely carry out their defined role within NHS Lanarkshire and have met the requirements for re-registration and revalidation where appropriate.

### 3. Scope

The policy applies to all directly employed staff with NHS Lanarkshire, that fall within the above parameters, irrespective of age, sex, disability, ethnicity/race, marital or civil partnership status, sexual orientation, religion or belief, pregnancy or maternity or gender reassignment. There is also a requirement to ensure that supplementary staff including agency staff are appropriately registered.

NHS Lanarkshire takes care to ensure your personal information is only accessible to authorised people. Our staff have a legal and contractual duty to keep personal health information secure, and confidential. In order to find out more about current data protection legislation and how we process your information, please visit the current data protection legislation notice on our website at <a href="www.nhslanarkshire.scot.nhs.uk">www.nhslanarkshire.scot.nhs.uk</a> or ask a member of staff for a copy of our current data protection legislation notice.



### 4. Roles and Responsibilities

### a) Senior Managers are responsible for:

- Ensuring there are systems and processes in place to support this policy and ensure line managers are aware of the policy and their responsibilities in relation to it.
- Investigate any staff that fail to re-register and revalidate where appropriate, within their area of responsibility.

### b) Line Managers are responsible for:

- Checking registration at shortlisting stage when reviewing application against criteria.
- Ensuring that the name badges of registered staff match the name as it is held on their professional register.
- Completing a department verification form (sample attached at Appendix 1).
   This will include details of all registered practitioners within the department.
- Ensuring that all registered professionals are registered in the correct part
  of the professional register appropriate to their area of practice and all
  recordable and registerable qualifications must also be checked as
  appropriate to the area of practice. This extends to individuals who work via
  an Agency or Private / Volunteering sector.
- Checking each practitioner's registration on renewal as per the registration cycle of each profession. An individual's registration status must be checked by the Head of Department by contacting the following:
- HCPC confirmation service on 0845 300 4472 or via the website: www.hcpc-uk.org
- NMC confirmation service 020 7333 9333 or via website: www.nmcuk.org
- GPhC. confirmation service only available through the website:https://www.pharmacyregulation.org/registers
- GMC confirmation service available through the website: <a href="www.gmc-uk.org/registrations-and-license/our-registers">www.gmc-uk.org/registrations-and-license/our-registers</a>
- GDC confirmation service available through the website: <a href="https://olr.gdc-uk.org/searchregister">https://olr.gdc-uk.org/searchregister</a>



 Failure to do so may lead to disciplinary action being taken against the line manager.

### c) Trade Unions/Professional Organisations are responsible for:

 Advising all registered professionals of their responsibilities with regard to this policy.

### d) All Staff with a professional registration are responsible for:

- Ensuring that they comply with their professional regulators requirements to maintain a current registration i.e. paying an annual retention fee, evidence of revalidation / appraisal and not allowing registration to lapse e.g. by delayed payment.
- Producing evidence of registration where appropriate which must be checked by their line manager.
- Producing evidence of current registration for verification, if they are supplied to NHS Lanarkshire by an employment agency. This must be checked before they commence duties with NHS Lanarkshire.
- Registered staff are required to practice using the same name as is held on their professional register, this to allow patients/public and NHS Lanarkshire to confirm a practitioner's eligibility to practice without difficulty
- In line with regulatory bodies codes of conduct Registrants must actively raise any known issues regarding their registration with their direct line manager or HR. i.e. any restrictions to practice, supervisory requirements, where there are legal proceedings in play
- Forwarding evidence of current registration for verification if staff are employed in the private and/or voluntary sector and provide services on NHS Lanarkshire's behalf to patients. Again these should be checked before they commence their duties.

A pro forma for maintaining annual/monthly registration checks for all staff except medical and dental is attached as Appendix 1.

### e) Human Resources

### HR Medical and Dental Services are responsible for:

- Completing a General Medical Council Check (GMC) and General Dental Council (GDC) at the initial recruitment stage and holding a copy of the status within the electronic personal file.
- Confirming prior to offering a role that all GMC/GDC registered professionals are registered in the correct part of the professional register appropriate to their area of practice and all recordable and registerable November 2025

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qualifications must also be checked as appropriate to the area of practice.

- Ensuring all professional agencies engaged in the provision of registered staff to NHS Lanarkshire are able to provide assurance of appropriate professional registration checks prior to NHS Lanarkshire engaging any of their staff.
- Gaining verification of GMC status where medical staff are appointed through another NHS board e.g. trainee, honorary, access to services etc. This will be done either through the appropriate board or from the staff member themselves.
- GPs and dentists working for NHS Lanarkshire are required to be listed on the performer's list. This check is carried out by the Primary Care team.
- Continuing checks for the Public Dental Service are undertaken by the General Dental Department.

### **General Recruitment** are responsible for:

• Confirming prior to offering a role that a candidate's registration has been seen at interview and that details are recorded on the interview assessment paperwork. The recruitment administrators will then update Job Train.

### f) Workforce Department are responsible for:

- The Workforce Department also issue any new Registration Fitness to Practice concerns to line managers on a weekly basis. Separate reports are issued to Medical and Dental Services. Via a link that is set up between the GMC and SWISS to provide an update when a change is made to GMC registration. These notifications are issued through eESS. Any issues will be reported to HR Medical and Dental Services and line manager for further investigation. Should there be any on-going concerns regarding the doctor, a regular meeting is held with a GMC representative or contact will be made directly with the GMC.
- Ensuring all professional agencies engaged in the provision of registered staff to NHS Lanarkshire are able to provide assurance of appropriate professional registration checks prior to NHS Lanarkshire engaging any of their staff.
- The Workforce Department are involved in the process of checking professional registration for Nursing/Midwifery Job Family only. This process takes place at the start, middle and end of each month as follows:



### **First Working Day of Month**

Workforce Team confirm previous month end lapses and advise Senior Nurse/Midwife, Chief Nurse/Midwife and Director to action any governance concerns.

#### Middle of Month

Workforce Team confirm with Senior Nurse/Midwife, Chief Nurse/Midwife and Directors a list of staff with outstanding registration but due to reregister by end of the month.

### **Last Working Day of Month**

The Workforce Team issue an update to Senior Nurse/Midwife, Chief Nurse/Midwife and Directors advising of staff with outstanding registration but due to re-register by end of month.

### Failure to Produce Evidence of Current Registration / Management of Lapsed or Lost Professional Registration

It is the responsibility of the individual employee to ensure that they maintain such registration as is necessary to enable them to practice.

Where professional registration is a condition of employment, and an employee allows their registration to lapse, through their own actions, they are no longer able to work in the capacity for which they are employed. They will not therefore be permitted to work in a role which requires professional registration. The employee will be temporarily redeployed to a non-registered post until their registration is reinstated. The remuneration will be in line with the roles available within the service. In instances where redeployment is not feasible, remuneration will be withheld. While this is not a punitive action this is a safeguard to both the employee and employer.

However, in circumstances where there is evidence produced that confirms this is an error wholly on the part of the professional registration body, or other circumstances e.g. a major banking systems failure, then these will be dealt with on an individual basis with the Line Manager and with HR support. There will be no detriment to the employee.

Managers will support individuals whose registration has lapsed, to help them to redress this, whilst at the same time, secure the safety of the service by ensuring staff do not work in a professional capacity without valid registration.

When it comes to the attention of a manager that an individual member of professional staff may not be appropriately registered, this must be investigated immediately, in line with the NHS Scotland Workforce Policies Investigation Process. If it is established that the employee's registration



has lapsed or been lost, it must be explained to the member of staff that until they are restored to the appropriate register they cannot continue in their job and are not permitted to work in a role which requires professional registration. This must be communicated to the employee in writing. Notification will also be made to the Payroll Department to ensure that individual receives appropriate payment during this period.

During the course of investigating the circumstances, the line manager will fully explore the reason for the registration having lapsed, been lost or the circumstances where an employee has knowingly worked without registration. Under the NHS Scotland Conduct Policy this may be progressed through early resolution in the first instance or progress straight to NHS Scotland policies Investigation process. The outcome of a formal investigation could be progression to a conduct hearing in line with the NHS Scotland Conduct Policy. Disciplinary action up to and including dismissal may be appropriate having regard to the employee's culpability in failing to renew or having lost their registration.

The subsequent return to professional role of the member of staff and/or the resumption of pay will be subject to the individual producing satisfactory evidence of registration. Once they are reinstated on the appropriate register, pay will be reinstated at the appropriate band / grade from the date on which the employee resumes registered duties. It is the manager's responsibility to ensure that the Payroll Department is advised without delay, to ensure that the individual is paid correctly.

### 5. Roles & Responsibilities - Education & Training

Initial training must be arranged to support new line managers in the process of checking professional registrations by their head of department.

All new registrants will be provided with re-registering criteria and processes from their registering body.

New Human Resources staff will be trained in the process of registration checking as part of the pre-employment processes.

New staff side representatives will be made aware of advising staff of this policy.

### 6. Resource Implications

No significant cost implications however time required for all involved to carry out roles within the policy, attend training and any activities associated with this policy.

### 7. Communication Plan

Circulate Policy via Joint Policy Forum, intranet, NHS Lanarkshire public website and cascade via management structure.



### 8. Quality Improvement - Monitoring & Reviewing

Senior managers have a responsibility to discuss registration checking processes and the results of these processes of registered practitioners with their direct reports to ensure the processes are robust.

### 9. Equality and Diversity Impact Assessment

This policy meets NHS Lanarkshire's EQIA



### 10. Summary or Frequently Asked Questions (FAQs)

### 11. References

### 12. Checklist

To be sent to Corporate policies:-

Copy of completed policy

Copy of EQIA

Copy of assurance process document for all policies

Copy of fast-track document if applicable

## Appendix I NHS Lanarkshire: Registrations



Name	Type of Registration	Locality	Registration Number	Date Due for Renewal	Date renewal verified
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### **Appendix 2**

# Medical and Dental (GMC and GDC)

- Medical and Dental staff's registgration can be viewed at www.gmc-uk.org/registrations-andlicense/our-registers & www.gdcuk.org/registration
- Information for hospital Medical & Dental staff provided by the workforce is issued to HRMDS who will advise Medical Managers if issues arise.
- Public Dentists are reviewed & checked by the Public Dental Services Clinical Director for Dentistry.

### Allied Health Professions (HCPC)

 Each Allied Health Profession has a specified date range for revalidation, which can be found via the following link to HCPC website: https://www.hcpcuk.org/registration/registration-renewals/when-torenew/

# Nursing and Midwifery (NMC)

- Senior and Chief Nurses/Midwives are responsible for reviewing and checking NMC revalidation information for their staff members.
- Information provided by the Workforce
  Department at the start, middle and end of each
  month is issued to assist Senior and Chief
  Nurses/Midwives with this process.

# Pharmacy (GPhC)

- Confirmation service only available through the General Pharmaceutical Council (GPhC) Website:
- https://www.pharmacyregulation.org/registers