Checking Professional Registrations Policy

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Governance or Assurance Committee	**Staff Governance Committee**
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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.	5
		Reflects SWAG guidance- failure to produce	Registrn. cert

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Policy for Checking Professional Registrations

1. Introduction

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, 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.

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4. Roles and Responsibilities

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.

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). 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.
- 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:

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- 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.nmc- uk.org

- GPhC. confirmation service only available through the website:- https://www.pharmacyregulation.org/registers

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

Nursing and midwifery (see Appendix 2) and Pharmacy staff checking is completed on a monthly basis.

HR Medical and Dental Services are responsible for: -

- Completing a General Medical Council Check (GMC) at the initial recruitment stage and holding a copy of the status within the personal file. Following this a link 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 the 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 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.
- 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.

Human Resources is 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.

- 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.
- Providing information within Appendix 2 as per frequency described. This will be provided by the workforce department.

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Trade Unions/Professional Organisations are responsible for:

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

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 unnecessarily eg 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.

- Actively raising any known issues regarding their registration with their direct line manager or HR.

- 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 proforma for maintaining annual/monthly registration checks for all staff except medical and dental is attached as Appendix 1.

FAILURE TO PRODUCE EVIDENCE OF CURRENT REGISTRATION

The following SWAG (Scottish Workforce and Staff Governance Committee) guidance will apply:

Failure to evidence current registration may result in disciplinary action being taken against the practitioner. Where a suitable post exists, NHS Lanarkshire will allow staff to work in an unregistered post until their registration certificate is confirmed for their substantive post.

It is advisable that the member if staff should work as an unregistered member of staff in another area and not their usual ward / tea or department. This will usually be as a Senior Healthcare Support worker (band 3).

- *"Where registration is suspended by the relevant statutory regulatory body as a holding measure whilst an investigation is underway into an individual (but where the individual continues to be employed by the Board), suspension from work (where it is identified that this is required) should be on full pay as per Board's local policies developed in line with the NHS Scotland Conduct policy.*

- *"In circumstances where it is identified that an individual's registration has lapsed, the matter may additionally require to be investigated under Boards' policies developed in line with the NHS Scotland Conduct policy, where concerns exist that the lapse is as a result of a deliberate failure of the individual to maintain their registration"*

Medical and Dental Practitioners will not be allowed to practice until registration has been obtained.

5. 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. 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)

N/A

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Appendix 1

NHS Lanarkshire: Verification Form - Registration for Practitioners

Department of: ……

Form completed by: …… **Date of completion**……

NAME	POSITION HELD	DATE REGISTRATION CHECKED	REGISTRATION NUMBER	DATE DUE FOR RENEWAL	DATE RENEWAL VERIFIED

This form should be completed and renewal checked as per the registration cycle of each profession and retained by Head of Department.

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NMC Registration Checks

1st – 4th of the Month
SCN/M checks system to identify staff members due to re-register and remind staff of responsibilities

15th of the Month
Workforce Team confirm with Chief Nurse/Midwife, Senior Nurse/Midwife, Directors a list of staff with outstanding registration but due to re-register by end of month

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

1st of Month
SCN/M checks status of all staff due to register from previous month – if the 1st falls at a weekend SCN/M must ensure a process is in place at the weekend to check NMC registration and action any governance concerns with Chief Nurse/Midwife, Senior Nurse/Midwife, On Site Manager

First working day after 1st of month
Workforce Team confirm previous month end lapses and advise Senior Nurse/Midwife, Chief Nurse/Midwife and Director to action any governance concerns

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