

Verification of Professional Registrations Policy

**NHS West Essex Clinical Commissioning Group Policy Reference Number:
WECCG101**

DOCUMENT CONTROL SHEET

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Change History:

Version	Date	Reviewer(s)	Revision Description
V1.0	April 2017	Human Resources Business Partner Team	Adapted for use as the Shared Service Policy.

Implementation Plan:

Development and Consultation	Adapted from the existing Verification of Professional Registrations policies developed in conjunction with, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.
Dissemination	This policy will communicate to staff representatives. It will be communicated electronically to all staff and managers and will be published on the CCG's intranet.
Training	There are no specific training requirements in order to implement this policy. However, managers will be able to access advice from the HR Department on the implementation and interpretation of this policy.
Monitoring and Review	All staff whose professional registration is due to lapse and proactively advises managers and record management compliance with this policy, which is reported to the CCG. The data identified from monitoring will be used to update the policy and ensure best practice as necessary.
Equality and Diversity	17/05/2017 - Equality Impact Assessment
Associated Documents	<ul style="list-style-type: none"> ▪ ▪ ▪
References	<ul style="list-style-type: none"> ▪ ▪ ▪

Document Status:

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1. Introduction

NHS Bedfordshire, NHS East and North Hertfordshire, NHS Herts Valleys, NHS West Essex and NHS Luton Clinical Commissioning Groups, (respectively referred to as 'the CCG') recognise if a staff member is employed in an area of work which requires membership of a professional body in order to practice (e.g. Nursing & Midwifery Council for nurses), it is a condition precedent of their employment to maintain membership of such a professional body.

The requirement to have a professional registration is identified in the person specification section of job descriptions and employment contracts, which set out the requirement to maintain registration and abide by the Code of Practice of their registered body. Documentary evidence of registration with the relevant professional body is required to be produced during the recruitment process.

Furthermore throughout their employment, all staff who are required to hold professional registration are required on demand by their line manager to provide documentary evidence of their registration with any particular professional body. The CCG also regularly undertakes proactive checks that professional registration status is being maintained.

The CCG takes very seriously any failure to maintain registration. Other than in exceptional circumstances, any such failure will result in suspension from duty without pay, temporary downgrading and/or disciplinary action which may result in the termination of employment.

This policy sets out the procedure adopted by the CCG for the verification of professional registration at recruitment, at appointment and during employment.

2. Scope

This policy applies to all CCG staff members, including Governing Body Members and Practice Representatives, whether permanent, temporary or contracted-in (either as an individual or through a third party supplier).

3. Definitions

Certain professional groups of staff are required to maintain registration with the appropriate professional body upon appointment and throughout their employment. It is illegal for these staff to perform professional tasks whilst not registered. The following professional groups are covered by this policy and defined as those requiring registration with the following professional bodies:

PROFESSIONAL GROUP	PROFESSIONAL REGISTRATION BODY
Doctors and Dentists	General Medical Council (GMC)
Nurses and Midwives	Nursing and Midwifery Council (NMC)
Pharmacists & Pharmacy Technicians	General Pharmaceutical Council (GPhC)
Finance Director	The Chartered Institute of Public Finance & Accountancy (CIPFA)

The following summarises the registration intervals for each professional group:

Nurses: Nurses register with the Nursing and Midwifery Council (NMC). Nurses are required to pay an annual retention fee and to revalidate every three years, demonstrating appropriate continuing professional development (CPD). The registration expiry date is always on the last day of any given month; the revalidation date is on the first day of the month in which expiry is due to take place.

Every three years at the point of renewal nurses are expected to revalidate by meeting a range of requirements to demonstrate that they are 'living' the standards as set out in the code. The registrant is expected to retain the requirements as a portfolio document using the 'NMC revalidation templates' as a mandatory CCG requirement.

Support plans are in place by the Nursing Directorate to ensure that there are no lapses.

Doctors: All doctors are required by law to be both registered with the General Medical Council (GMC) and hold a license to practice before they can undertake any form of medical practice. All registered doctors will normally be automatically awarded a license to practice, providing they are registered with the GMC. Registration is for one year and must be renewed annually. Consultants must also be on the specialist register for their specialist area of practice. Foundation Year 1 (FY1) doctors are required to hold provisional registration with the GMC and are eligible for full registration on completion of FY1 training.

Pharmacists and Pharmacy Technicians: Pharmacists and Pharmacy Technicians must renew registration on an annual basis in line with their personal renewal date. A payment must be made and a declaration of fitness to practice is made.

Revalidation: for the avoidance of doubt, the term registration also encompasses any relevant revalidation requirements for individuals.

4. Policy Statement

It is the CCG's policy to ensure that all staff recruited and employed by the CCG hold the correct registration required to carry out the role in which they are employed, both when they start and throughout their employment, in accordance with the law, sound clinical governance procedures and the NHS Employment Check Standards

(<http://www.nhsemployers.org/RecruitmentAndRetention/Employment-checks/Employment-Check-Standards/Pages/Employment-Check-Standards.aspx>).

5. Responsibilities

Employees

If a staff member is required to be registered with a professional body for the role they undertake whilst in employment by the CCG, it will be the individual's responsibility to ensure that they maintain their registration (and licence to practice where applicable) at all times. They will also be expected to provide evidence of their professional registration to their line manager when required.

Employees are required to advise the CCG of any limits on or changes to the terms of their registration, including commencement of any investigation, complaint or other proceedings related to their registration status or professional body.

Employees must familiarise themselves with the content of this document.

Recruiting Managers

The recruiting manager will be responsible for checking applicants' registration status at interview and only shortlisting for interview applicants who hold suitable registration.

Managers preparing job descriptions and person specifications are responsible for ensuring that essential qualifications and professional registration requirements are stated in the person specification for all appropriate posts.

Where a post requires a clinical or practice qualification which is not subject to professional registration, it is the responsibility of the recruiting manager to take any necessary steps to ensure that the certificate (or other evidence of qualification) is genuine and is awarded by an appropriate institution. This may require checks with the awarding institution and/or consultation with relevant professional leads about the status of the awarding institution.

Recruiting managers must familiarise themselves with the content of this document.

HR and ODL

The HR and ODL team will carry out professional registration checks for new staff and ensure that any prospective employee who fails the registration check will not be confirmed in post until this requirement can be satisfied. If the individual fails to satisfy this requirement within a reasonable timeframe, the HR and ODL team will liaise with the recruiting manager regarding withdrawal of the offer of employment.

Details of successful checks (e.g. copy of GMC certificate or print out from the appropriate professional body's website) will be included on the individual's HR file. The HR team will also enter professional registration numbers onto the Electronic Staff Record (ESR) system.

The HR and ODL Shared Service will be responsible for checking on a monthly basis whether any staff member's professional registration has lapsed or is due to lapse in the following month.

The HR and ODL team will maintain and update the Verifications of the Professional Registrations Policy to ensure it is in line with organisational and legislative changes.

The HR and ODL team will provide advice and support to line managers on the application of policy and guidance.

Line Manager/Head of/CCG Lead for Relevant Profession

The line manager and head of the relevant profession will be responsible for ensuring that appropriate action is taken where a staff member's registration is about to lapse/has lapsed. The head of the relevant profession will be responsible for referrals to the relevant professional body.

Line managers and heads of professions/CCG professional leads must familiarise themselves with the content of this document.

6. Procedure

6.1 Procedure For Dealing With Missing Or Incorrect Registration Numbers

Any member of staff required to hold a registration for their post but who is found to have no valid registration details entered on ESR will have their registration details checked by the HR and ODL team on the relevant professional body's website. Once valid details are verified these are entered on ESR.

If valid registration details are not established, the procedure for dealing with lapsed registrations is detailed below.

6.2 Procedure For Dealing With Lapsed Registrations

Registered staff who fail to maintain registration may not continue to undertake clinical/other relevant duties and may be suspended from duty without pay until such time as the CCG receives confirmation that registration has been reinstated. In exceptional circumstances, the staff member may be allowed to continue working in an unregistered post whilst the lapse is rectified. Pay will be reflective of the lower band and will set at the bottom of the lower pay band.

Pay will be restored to its normal level with effect from the date that confirmation of registration is received by the CCG from the employee.

Across all staff groups, whether a lapse in professional registration, or failure to comply with a request to renew registration, is deemed a formal disciplinary matter will be decided by the employee's manager in conjunction with the Human Resources team and dependent on the circumstances; for example, the length of time of the lapse, attempts made by the employee to update the registration and any mitigating reason of delay by the particular governing body (e.g. backlog of registrations or technical issues).

Once registration has been successfully renewed, the new date is entered on ESR.

Nurses: nurses registrations lapse as soon as their expiry date passes. If any nurse's registration lapses, the nurse, their manager and/or service manager, the Director of Nursing and the appropriate HR representative are informed immediately by email. Additionally the nurse and their manager are informed that until the registration is confirmed as being valid, the nurse in question must by law be taken off clinical duties and action should be taken in line with the procedure for dealing with lapsed registrations.

Doctors: if for any reason a doctor is removed from the register, the manager is informed immediately by the HR and ODL team and will take steps to ensure that the individual concerned is not undertaking clinical work. The GMC may remove a doctor from the registered list for administrative reasons such as failure to pay fees or maintaining an effective registered address, or for fitness to practice.

Pharmacists and Pharmacy Technicians: any Pharmacist who appears on the GPhC online register is registered. The deadline for renewal of registrations is the Pharmacist's individual annual renewal date.

If for any reason a Pharmacist is removed from the register, their manager must be informed immediately so they can consult with their HR Business Partner and take steps to ensure that the individual concerned is not undertaking clinical/other inappropriate work and that this policy is followed.

6.3 New Staff Awaiting Registration

New staff who start without being able to undertake professional duties as they are awaiting confirmation that they are registered with their professional body, may at the discretion of the recruiting manager commence in an unregistered post whilst awaiting confirmation of registration. Pay will be set at a level reflective of the lower grade. Pay will be increased to the level appropriate to the qualified post with effect from the date that confirmation of registration is received by the CCG from the employee. Pay increases will not be backdated.

6.4 Alert Notifications

Health Care Professional Alert Notices are sent as and when necessary from National Clinical Assessment Service (NCAS) to the CCG. They are a way of notifying organisations about registered health professionals whose performance or conduct could pose a risk to patients, staff or the public.

As and when these are received from the relevant bodies, the HR and ODL team check to ensure that none of the individuals removed or suspended from the register are employed by the CCG or none of the individuals removed or suspended are in the process of being appointed.

6.5 Fitness To Practice Concerns – notifying regulatory bodies

Should it arise that an employee's 'fitness to practice' and professional conduct is of concern then the CCG has a responsibility for notifying regulatory bodies. Referrals will be made in line with the referral rules for each regulatory body, after consultation with the head of the relevant profession within the CCG.

Staff Working In the CCG Under A Legal Agreement With Their Employer

It is the responsibility of the employer that these staff comply with professional registration requirements and this should be clearly stated in all legal/secondment agreements.

Monitoring and Audit Arrangements

Records of monthly registration checks are logged and kept by the Workforce Information Team within the HR and ODL shared service including actions taken to rectify any missing or lapsed professional registrations.

Appendix 1: Equality Impact Assessment Stage 1 Screening

Very occasionally it will be clear that some proposals will not impact on the protected equality groups and health inequalities groups.
 Where you can show that there is no impact, positive or negative, on any of the groups please complete this form and include it with any reports/papers used to make a decision on the proposal.

Name of policy / service	Verification of Professional Registrations Policy
What is it that is being proposed?	NHS Bedfordshire, NHS East and North Hertfordshire, NHS Herts Valleys, NHS West Essex and NHS Luton Clinical Commissioning Groups, (respectively referred to as 'the CCG') recognise if a staff member is employed in an area of work which requires membership of a professional body in order to practice (e.g. Nursing & Midwifery Council for nurses), it is a condition precedent of their employment to maintain membership of such a professional body. It is the CCG's policy to ensure that all staff recruited and employed by the CCG hold the correct registration required to carry out the role in which they are employed, both when they start and throughout their employment, in accordance with the law, sound clinical governance procedures and the NHS Employment
What are the intended outcome(s) of the proposal	This policy sets out the procedure adopted by the CCG for the verification of professional registration at recruitment, at appointment and during employment.
Explain why you think a full Equality Impact Assessment is not needed	This policy applies the statutory requirements. There is no scope for variation from those requirements.
On what evidence/information have you based your decision?	N/A
How will you monitor the impact of policy or service?	New HR data collection systems being established.
How will you report your findings?	As part of usual staff data reporting.

Having considered the proposal and sufficient evidence to reach a reasonable decision on actual and/or likely current and/or future impact I have decided that a full Equality Impact Assessment is not required.

Assessors Name and Job title, Date	Paul Curry, Equality and Diversity Lead 17 May 2017
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