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VALIDATING REGISTRATION OF HEALTHCARE PROFESSIONALS' PROCEDURE

Introduction and Aim

The purpose of this procedure is to ensure effective monitoring and management of the registration of regulated Healthcare Professionals within Public Health Wales

Linked Policies, Procedures and Written Control Documents

- Registration for Regulated Healthcare Professionals Policy
- All Wales Medical Appraisal Policy
- Procedure for Notifying and Reporting Possible Fitness to Practice Concerns for Healthcare Professionals Regulated by the Health and Care Professions Council (HCPC) and Nursing and Midwifery Council (NMC)

Scope

The Public Health Wales regulated staff that require professional registration in order to practice include:

- Medical
- Dental
- Pharmacists
- Nursing and Midwives
- Allied Health Professionals
- Healthcare scientists
- Public Health Consultants (if they hold a regulated professional qualification)

Equality and Health Impact Assessment	This has been completed and no impact has been identified
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Accountable Executive Director/Director	Claire Birchall Interim Executive Director Quality, Nursing and Allied Health Professionals. Professor Fu-Meng Khaw, Executive Medical Director National Director for Health Protection and Screening Services
Author	Caroline Whittaker Professional Lead Nursing, Midwifery and Standards Manager, Quality Nursing

and Allied Health Professionals
Professor Edward Guy, Professional Lead Health
Care Science and Allied Health Professions - Quality,
Nursing and Allied Health Professionals.

Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author

Summary of reviews/amendments

Version number	Date of Review	Date of Approval	Date published	Summary of Amendments
2	April 2022			General update Included reference to midwives

1 Introduction

Public Health Wales is to ensure that all employees who have a statutory requirement to be registered (and, where appropriate, licensed), in order to practice their profession, are appropriately registered at all times. This procedure supports the Registration for Healthcare Professionals Policy.

Registered Healthcare Professionals have the ultimate responsibility for ensuring they are registered with the appropriate regulatory body and that they provide Public Health Wales with confirmation of their valid registration. However, Public Health Wales recognises its responsibility in checking the professional registrations for new employees and monitoring the renewal of registrations.

2 Roles and Responsibilities

2.1 New Employees

Registered Healthcare Professionals are required to provide proof of their registration (and in the case of doctors that they additionally hold a licence to practice medicine) during the interview stage of the recruitment process. Prior to making an offer of employment, the appointing officer should check with the regulatory body that the successful candidate is on the appropriate register and fit to practice. This information will be confirmed by recruitment prior to an offer of employment being made.

The original document and/or PIN card and/or copy of line confirmation will be viewed and photocopied/ printed by the enrolling officer during the enrolment process. A copy of the registration certificate/ online confirmation or PIN card will be placed on the professional's personal file. The registration details of the new employee, including registration number and registration expiry date will be entered on the Electronic Staff Record by the Enrolling Officer.

The manager or appointing officer will inform the People and Organisational Development Directorate if employees are appointed to a non-qualified post, prior to registration being confirmed. This will be done for a fixed period, as agreed by the manager and the individual. Pay will be at the rate of the non-qualified post, until proof of qualification is received and confirmed.

Employees who fail to provide evidence of professional registration will not be allowed to commence their duties and their offer of employment will be withdrawn.

2.2 Employees

It is the responsibility of the individual employee to ensure that they maintain such registration as is necessary to enable them to practise their profession within the NHS.

Each individual employee will be required to provide evidence of professional registration and qualifications prior to commencement of their employment with Public Health Wales.

Each individual employee is responsible for ensuring that their manager is provided with evidence of their registration and the expiry date, on renewal of their registration.

The employee is also responsible for maintaining any Continual Professional Development (CPD) portfolio that is required by the regulatory body.

2.3 Bank staff

Staff engaged to undertake bank duties will be subject to the registration arrangements for new employees and existing staff as detailed above.

2.4 Agency employees

Where agency staff are authorised to work within the organisation, the agency employee must be asked to verify their professional registration prior to them undertaking any work.

Agency employees must provide their PIN or registration number to the employing manager so that registration can be checked and verified, prior to them being allowed to commence working on Public Health Wales premises.

2.5 Work Placements and Trainees

Registered Healthcare Professionals attending the organisation to participate in specific work placements or participate in training will be required to be registered with their appropriate regulatory body.

The work placement / trainee health professional will be required to verify their professional registration, where applicable, by providing their PIN or registration number, prior to the commencement of their work placement or training.

2.6 Honorary Contract Holders

Registered Healthcare Professionals holding an 'Honorary Contract' with Public Health Wales will be required to be registered with their appropriate regulatory body.

The Registered Healthcare Professional will be required to verify their professional registration by providing their PIN or registration number prior to their commencement of their work placement within the organisation.

2.7 Public Health Wales

It is the responsibility of Public Health Wales to ensure that the registration status of Registered Healthcare staff is confirmed and monitored on an ongoing basis and that the policy is brought to the attention of new and existing managers, with responsibility for the employment and management of

professionally registered staff. Before any offer of employment is made, the appointing officer should check with the appropriate regulatory body that a new recruit to a regulated health profession is fit to practice and whether any special conditions apply.

2.8 Manager

The manager of Registered Healthcare Professionals must ensure that arrangements are in place for a systematic, annual or bi-annual review to ensure that the renewal of registration is carried out and checked for all of their registered staff. Managers need to ensure they have an appropriate system in place to check evidence of individual registration. This will be subject to regular audit. Failure to check a professional's details against the appropriate register places the public, Public Health Wales and the professional's colleagues at risk. It is essential for managers to check the professional's registration, both before appointment and as required thereafter. The Manager must have seen the original certificate or online screen confirmation as it will contain real time information. The role for ensuring that the follow up process for checking professional registration is undertaken must be designated to an appropriate manager by each Division/ Directorate. It will be the responsibility of the People and Organisational Development Directorate to ensure that the Electronic Staff Record (ESR) is maintained and that there is a centralised record of professional registrations, including registration numbers and renewal dates. The People and Organisational Development Directorate will provide timely and accurate reports from the Electronic Staff Record (ESR) as required by the Executive / Board Committees on the registration status of professional staff. The appropriate Divisional Directors/ Executive Directors are responsible for ensuring adequate checks are in place for checking and recording the professional registration of their managers, who are required to register with a regulatory body. All staff should be facilitated in the development of professional portfolios required for registration/ revalidation and, where possible and within available resources, the maintenance of CPD portfolios.

Managers will require sight of a registration certificate or online confirmation from the health professional to show that membership has been renewed. The registration details will be checked, and the details recorded. A copy will be forwarded to the People and Organisational Development Directorate and the Electronic Staff Record updated.

The registration details may additionally be verified with the appropriate registration body in accordance with the methodologies set out in Appendix A. Public Health Wales strongly encourages managers to use the on-line checking facilities to verify registration. Where this is not possible, they should check registration details using the telephone helpline, to ensure that only staff that are deemed fit to practice are allowed to work within the organisation.

Managers will need to confirm registration for staff returning from Maternity leave, a career break, or other long-term absence e.g., sickness or secondment, to ensure they have up to date professional registration. A copy of which should be forwarded to the People / Human Resources Department.

3 Procedure for Dealing with cases of Lapsed Professional Registration (where registration is a requirement of their employment) or Suspension by the Regulatory body

3.1 Immediate Action / Preliminary Investigation

From time-to-time cases arise whereby individual Registered Healthcare Professionals allow their registration with their appropriate regulatory body to lapse. This could be a hiatus in personal administration, or such registration is suspended by the regulatory body.

When it comes to the attention of a manager that a Healthcare Professional may not be appropriately registered for their role, they should fully investigate the situation and report it to the Divisional Director/ Executive Lead.

If registration has lapsed due to an administration error the individuals is to be removed from the clinical setting (if employed within a clinical role) until they can prove that their registration has been reinstated with their professional body.

During this period, because the employee cannot be employed in their professional capacity, they can, at the discretion of their manager, work and be paid as an unqualified assistant (e.g., Healthcare Support Worker) and will take on the role profile of the grade until their re-registration is confirmed (where applicable) or other action is taken by the organisation. The payment at the unqualified assistant grade would take effect from the date when the lapse or suspension in registration became known to the organisation.

As an alternative, the employee may be given the offer of taking any outstanding accrued annual leave entitlement (earned up to the point that registration lapsed or was suspended). This would be paid at their substantive grade.

If the registration has lapsed and the member of staff is not able to fulfil the role of an assistant and has exhausted their accrued annual leave entitlement, they will be required to take unpaid leave until their registration is renewed. If registration is suspended, they may need to be suspended by the organisation pending an investigation.

The subsequent return to work and/or the resumption of pay will be subject to the employee producing evidence of their re-registration. As soon as such evidence is received, whether or not the employee is immediately returned to duty, their pay should be reinstated.

Proof of registration will be regarded as documentary evidence of re-registration issued by the regulatory body to the employee concerned or confirmation by checking electronically online with the regulatory body.

In circumstances where it is alleged that lapsed registration has occurred due to the failure of the regulatory body the manager will clarify the position with the regulatory body concerned.

3.2 Disciplinary Action

Disciplinary action may be appropriate having regard to the employee's culpability in all of the circumstances of the case.

Where it is felt that disciplinary action may be appropriate, Public Health Wales Disciplinary Policy and Procedure should be followed, and advice received from the People and Organisational Development Directorate.

4 Monitoring compliance

The requirement for monitoring and auditing is set out within the related policy (Registration for Healthcare Professionals Policy). Appropriate systems need to be in place to check evidence of individual registration. These will be subject to regular audit in order to provide assurance to the Executive Team and Board.

Appendix A: Professional Regulatory Bodies

General Chiropractic Council (GCC)

GCC website: www.gcc-uk.org/

GCC enquiry service: **020 7713 5155**

General Dental Council (GDC)

GDC website: www.gdc-uk.org

GDC's enquiry service: **(0) 20 7167 6000**

General Medical Council (GMC)

GMC website: www.gmc-uk.org

GMC enquiry service: **0161 923 6602**

General Optical Council (GOC)

GOC Website: www.optical.org/

GOC enquiry service: **020 7580 3898**

General Osteopathic Council (GOsC)

GOsC website: www.osteopathy.org.uk/home/

General enquires: **020 7357 6655**

Health and Care Professions Council (HCPC)

HPCP website: www.hcpc-uk.co.uk

General enquires: **0300 500 6184**

General Pharmaceutical Council (GPhC)

GPhC website: www.pharmacyregulation.org/registration

General enquires: **0203 713 8000**

Health and Care Professions Council (HCPC)

HCPC website: www.hcpc-uk.co.uk/

General enquires: **(0)300 500 6184**

Nursing Midwifery Council (NMC)

NMC website: www.nmc.org.uk

Registration enquires: **020 7333 9333**

Pharmaceutical Society of Northern Ireland (PSNI)

PSNI website: www.psni.org.uk/

General enquires: **028 9032 6927**