



PROFESSIONAL REGISTRATION POLICY

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CONTENTS	PAGE NO.
1. PURPOSE & SCOPE OF POLICY	3
2. STATEMENT OF POLICY	3
3. EQUALITY & DIVERSITY IMPACT ASSESSMENT	4
4. DEFINITIONS	4
5. RESPONSIBILITIES & ORGANISATIONAL ARRANGEMENTS	5
APPENDICES	
Appendix A – Professional Registration Bodies	9
Appendix B - Professional Registration Flowchart	10
Appendix C – Process for Checking Registration	11

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1. PURPOSE & SCOPE OF POLICY

There are a range of professional groups for whom professional registration is a statutory requirement for employment in the National Health Service. These groups include Medical and Dental, Nursing, Midwifery, Allied Health Professionals, Biomedical /Laboratory and Pharmaceutical staff. A full list is contained in Appendix A.

NHS Dumfries and Galloway have a duty to ensure that new and existing employees are registered with a relevant regulatory/licensing body in order to comply with the requirements of their employment contract.

The purpose of this policy is to set out the procedural steps necessary to ensure patient safety and public protection relating to professional registration status of individuals within NHS Dumfries and Galloway at the various stages of employment.

This Policy applies to all professional staff within NHS Dumfries and Galloway for whom professional registration is a statutory requirement for employment. This policy includes third party contractors. This Policy must be used in conjunction with national guidance and as well as Workforce policies and procedures that NHS Dumfries and Galloway has in place for employee practice.

2. STATEMENT OF POLICY

This policy aims to:

- Ensure that employees who require professional registration for employment are fully aware of their contractual obligation to demonstrate fitness to practice through professional registration with their regulatory body
- Set out the procedural steps necessary for checking of professional registration status at various stages of employment
- Set out the implications of allowing one's professional registration to 'lapse'
- Set out the procedural steps for periodic checking of registration status.

This policy emphasises that it is each individual employee's responsibility to ensure his or her registration with a professional/regulatory body remains current at all times.

NHS Dumfries and Galloway will confirm proof of registration using the employer confirmation services of the relevant professional body.

Where there are concerns about an individual's professional conduct or competence, advice will be sought initially through the individual's line manager or Workforce Directorate, whereby NHS Dumfries and Galloway Workforce Policies will be adhered to in respect of ensuing investigation of complaints, capability, and/or staff discipline issues.

Where there are concerns relating to an individual's suitability to be on the professional register NHS Dumfries and Galloway as an employer, will make a decision with regard to submitting a formal referral /complaint to the professional body. This will be carried out in consultation and with the agreement of the Executive Director of the relevant group of staff.

3. EQUALITY & DIVERSITY IMPACT ASSESSMENT

NHS Dumfries and Galloway must ensure that it's policies do not disadvantage individuals because of their age, ethnicity, gender, religion, faith, disability or sexual orientation.

In line with the Scottish Government's guidance an Equality and Diversity Impact Assessment has been completed.

4. DEFINITIONS

For the purpose of this policy the following definitions are proposed:

Professional Registration

A process, which confirms that individuals meet normal standards of competence, training, education and integrity required for practice and ensures entitlement to engage in such practice. In addition, this registration must be current and relevant to their area of employment.

Lapsed Registration

Where individuals have allowed their license with their professional body required for them to practice within their role, to expire.

Lost Registration

Where individuals have had their registration removed by their relevant professional organisation.

Third Party Contractor

A flexible employee, employed via a third party organisation with which NHS Dumfries and Galloway may engage to supply staff on an ad-hoc basis.

5. RESPONSIBILITIES & ORGANISATIONAL ARRANGEMENTS

Recruitment & Selection

All adverts for positions within NHS Dumfries and Galloway will contain details of the professional registration required for the post. It will be the recruiting manager's responsibility to ensure that this is in place. NHS Dumfries and Galloway job descriptions will reflect the professional registration requirements for the post advertised. Person specifications must contain the requirements for registration.

Application forms will request details of membership of Professional Regulatory body i.e. full name of organisation, registration number and renewal date and recruiting managers will ensure that this information is completed before considering for shortlisting.

Prior to the interview stage of the recruitment process, the Recruiting Manager will ensure prospective employees are informed in writing of the requirement to produce evidence of current registration at the time of interview.

At interview, candidates should be asked if their professional registration is up to date and if there are any pending actions within it. They will be asked to provide evidence of registration and it will be the recruiting manager's responsibility to visually inspect this and then follow this up via the relevant professional body.

Offers of employment will be subject to successful candidates being appropriately registered with the relevant professional body. The Recruiting Manager will be required to check with the relevant professional body that the registration is current at the time of appointment. **New employees are not permitted to commence duties without the appropriate verification of their registration.**

Any prospective employee who cannot, for whatever reason, supply these details will not be appointed until the individual has contacted the relevant professional body and produced documentary proof of registration.

When an interviewee is awaiting examination results it should be made clear, usually at interview and confirmed in writing, that any offer of employment is subject to:

- i) Satisfactory examination results;
- ii) Their intentions to register and to produce evidence of that registration as required above prior to confirming the appointment.

A Professional Registration Flowchart is outlined in Appendix B.

Where levels or sub categories of registration are required i.e. GMC Specialist Registration then this should be verified as above.

Management of Ongoing Registration

Every manager of registered professional staff will ensure that local arrangements are in place for systematic, regular review to ensure that renewal of registration is carried out and checked for the relevant staff for which they are responsible.

Managers must ensure that:

- Visual scrutiny of registration documentation and confirmation of registration status with the relevant professional body
- Details of the registration number and date of expiry are recorded on HR.net. (HR.net will email managers reminders of renewal dates).
- They apply the procedures outlined in this policy fairly and equitably
- Those individuals within their sphere of Management/Professional responsibility hold the appropriate current registration during employment
- As professionals specialise, additional qualifications necessary to undertake specialist/expanded roles are entered in the professional register, which is annotated accordingly. e.g. Non-Medical Prescribing Qualification.
- Appropriate and adequate records are kept of this information. These records will be regularly reviewed and such action, as the Manager feels appropriate taken to seek/obtain evidence of renewal of registration. These records will be stored securely and be subject to Data Protection Act requirements.

The Individuals Responsibility

All employees for whom professional registration is a statutory requirement for employment within NHS Dumfries and Galloway have a duty to maintain their registration status during the course of their employment. As a member of a profession, the onus must be on the individual to ensure that they:-

- Produce suitable evidence of up to date professional registration on commencement of employment and ensure that their documentary evidence relating to registration/re-registration is kept in a safe place.
- On request by their Line Manager, provide evidence that their professional registration has been renewed in accordance with relevant regulations.
- On request provide evidence of additional qualifications necessary to undertake specialist/expanded roles and provide evidence that the professional register has been annotated accordingly.
- Notify their line manager as soon as their professional registration renewal documentation is available.
- Keep the relevant statutory body informed of changes of address, status, etc., in order that internal records are accurate and up to date and routine renewal advice is received.
- Report any information to their employer which is relevant to their continued registration ie. being subject to an investigation.
- Pay the fees associated with new/renewal of registration.

- On receipt of/or renewal of registration, ensure that their line manager and/or professional lead is shown original documentation so that the registration can be verified and copies taken for their personal file/entered on to HR.net.
- Report any failure to re-register with their professional body to their line manager immediately.

In addition to maintaining their registration, it is a statutory requirement for midwives to give notice of intention to practice to the local supervising authority in every area that they intend to practice in.

Third Party Contractors

For the purpose of this policy, a third party contractor is an external staff agency.

Staff Bank

The Staff Bank will maintain records of all registered bank staff's professional registration details.

Management of Lapsed Professional Registration

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 National Health Service.

There will be occasions whereby individual members of these professions allow their registration with their professional body to lapse. It is essential that in such circumstances, managers who are required to deal with such situations adopt a consistent approach.

Where professional registration is a condition of employment, and a member of staff allows their registration to lapse, they are no longer able to work in the capacity for which they are employed. They will not be permitted to work and will not receive payment for the period they are not registered. However in circumstances where there is evidence produced that confirms this is an error wholly on the part of the professional registration body, then these will be dealt with on an individual basis with the local Manager and HR Support.

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 fully investigated immediately. If it is established that the employee's registration has indeed lapsed, 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.

During this period, because they cannot be employed in their professional capacity, or any other capacity, they will be required to take unpaid leave. This must also be communicated to the employee in writing. This letter will also be copied to the Payroll Department to ensure that individual does not receive payment during this period.

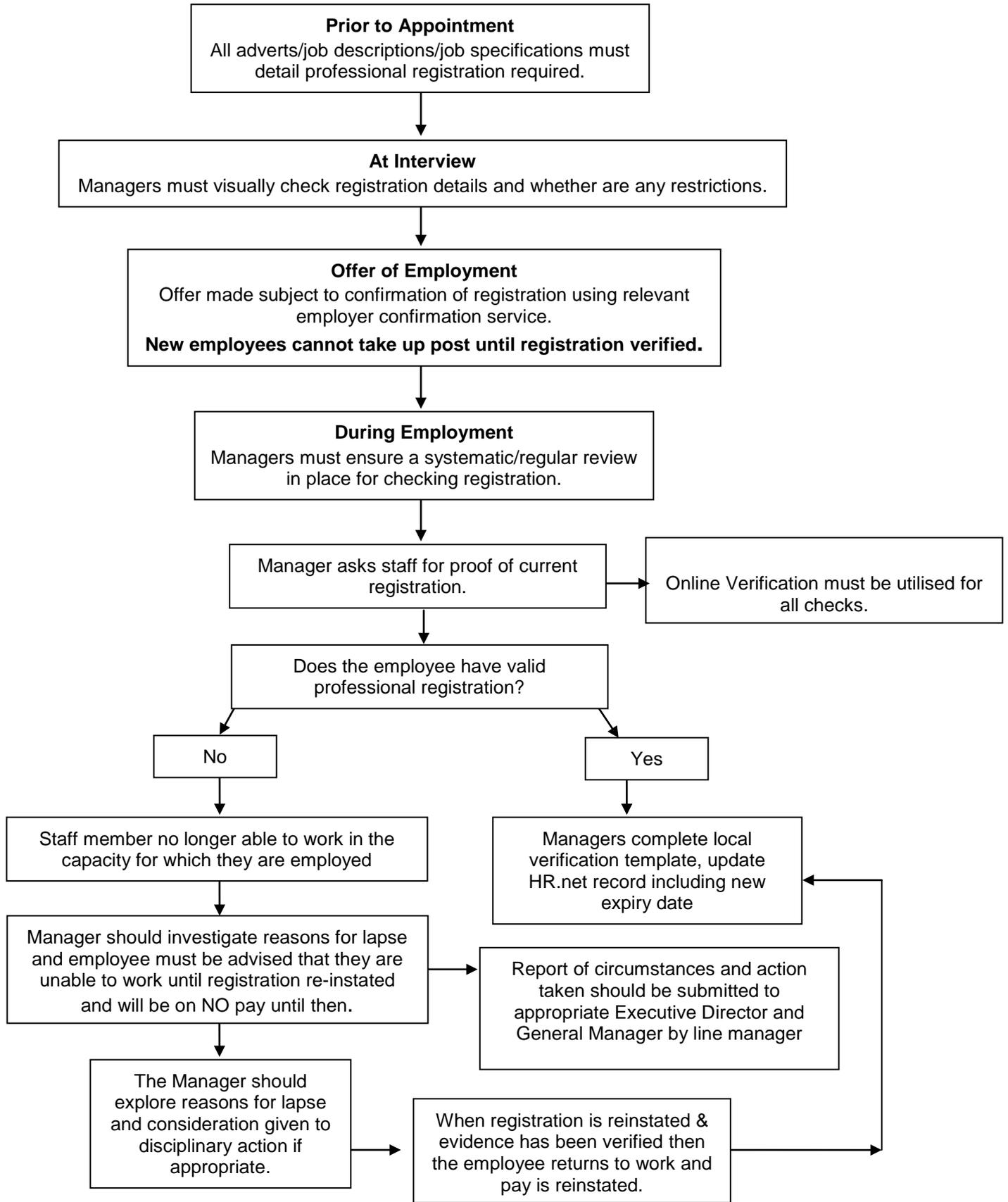
During the course of investigating the circumstances, the manager will fully explore the reason for the registration having lapsed. Disciplinary action may be appropriate having regard to the employee's culpability in failing to renew. Where it is felt that disciplinary action may be appropriate, NHS Dumfries and Galloway's Disciplinary Policy will be followed.

The subsequent return to work of the member of staff and/or the resumption of pay will be subject to the individual producing evidence of satisfactory registration. Once they are reinstated on the appropriate register, pay will be reinstated from the date in which the person returns to work. It is the manager's responsibility to ensure that the Payroll Department is advised without delay, to ensure that the individual is paid correctly.

In all cases of lapsed registration, a full report of the circumstances and action taken will be submitted by the Line Manager to the appropriate Executive Director and General Manager.

Professional Registration Bodies

General Chiropractic Council (GCC)	-	regulates chiropractors
General Dental Council (GDC)	-	regulates dentists, dental nurses and dental technicians.
General Medical Council (GMC)	-	regulates doctors
General Optical Council (GOC)	-	regulates optometrists, dispensing opticians, student opticians and optical businesses
General Osteopathic Council (GOsC)	-	regulates osteopaths
Health and Care Professions Council (HCPC)	-	regulates the members of 15 health professions; art therapists, biomedical scientists, chiropodists/podiatrists, clinical scientists, dieticians, hearing aid dispensers, occupational therapists, operating department practitioners, orthoptists, paramedic, physiotherapists, practitioner psychologists, prosthetists/orthotists, radiographers and speech & language therapists.
Nursing & Midwifery Council (NMC)	-	regulates nurses and midwives
General Pharmaceutical Council (GPhC)	-	regulates pharmacists and pharmacy technicians in England, Wales and Scotland.



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Appendix C

Verification of Professional Registration for Nurses and Midwives

It is the responsibility of individual nurses and midwives to ensure that they have up to date professional registration with the Nursing and Midwifery Council (NMC).

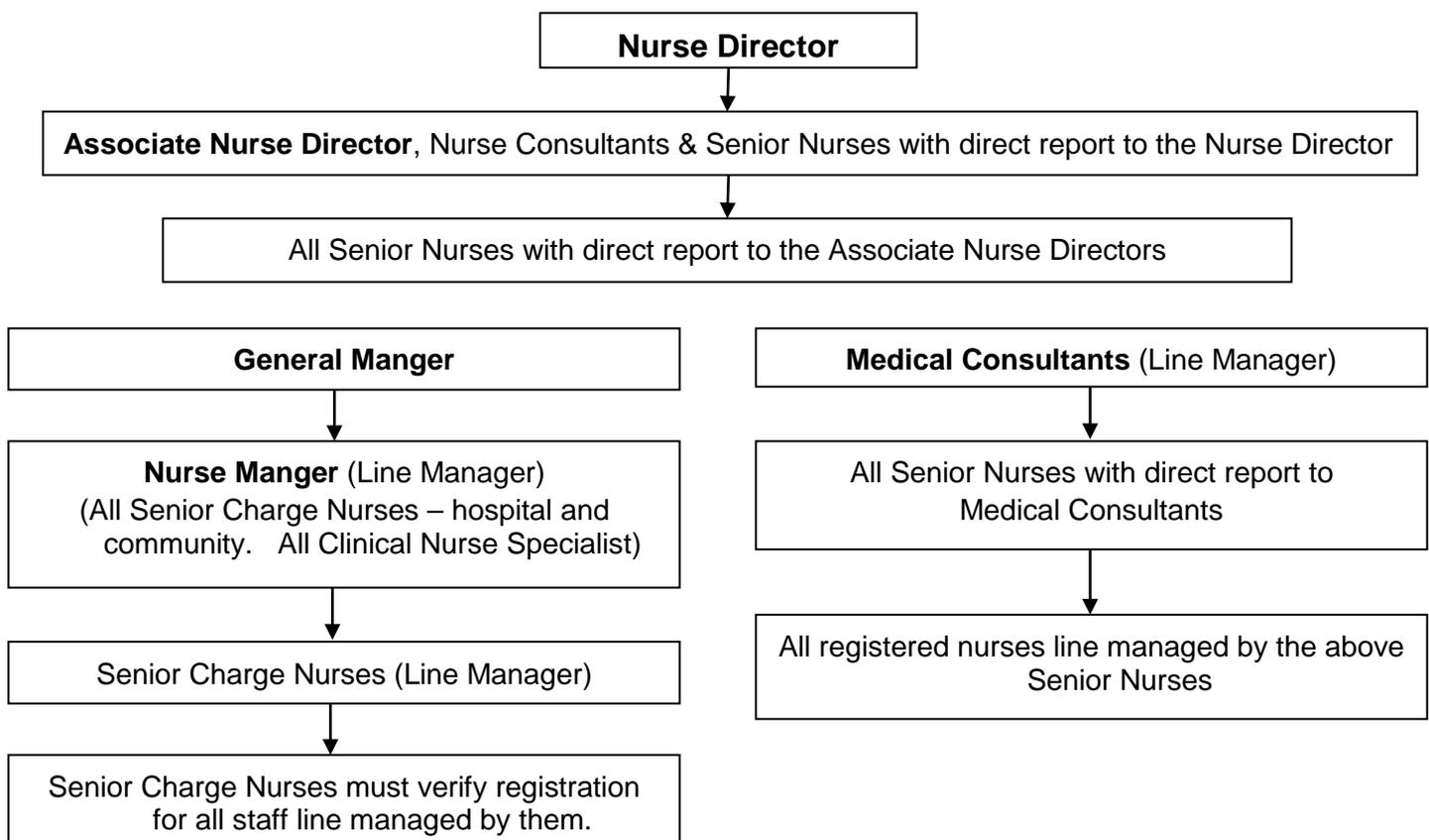
All line managers are responsible for ensuring that all professional registrations are checked and verified on the NMC register.

It is a criminal offence to practice as a nurse / midwife if you are not registered.

Each of the following elements must be checked and verified on the NMC website using the employer's access code:

- Name
- Registration Number
- Date of Birth
- Location

Following verification, the line manager must update HR.net to reflect the current registration information.



General Managers, Nurse Managers and Medical Consultants must carry out random sampling on the NMC website each month (minimum of 10) and must be able to provide assurance to the Nurse Director and Chief Executive that all registrations for Nurses and Midwives are current with the NMC.

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