



Professional Registration Monitoring Policy and Procedure

Name	Professional Registration Monitoring Policy & Procedure
Summary	The aim of this policy is to ensure that procedural steps are in place to safeguard patient safety and public protection relating to professional registration status of individuals within the NWTCCB at the various stages of employment
Associated Documents	Nursing and Midwifery Referral Guidelines, Management of Employee Conduct Policy, Recruitment and Selection Policy
Target Audience	All staff with professional registration, department managers, HR
Version number	1.0
Date of this version	January 2015
Review Date	December 2018
Date of full impact assessment	
Name of Board	National Waiting Times Centre
Approving committee/group	SMT/Partnership Forum
Document Author	David Miller, Head of HR

CONTENTS

Section	Page
1. Purpose and Scope of Policy	4
2. Policy statement	4/5
3. Equality and Diversity Impact Assessment	5
4. Definitions	5
5. Responsibilities & Organisational Arrangements	6
6. Management of Professional Registration	7/8
7. Management of Lapsed Professional Registration	9/10
APPENDICES	
Appendix A – Professional Registration Bodies	11

National Waiting Times Centre Board Values Statement

What we do or deliver in our roles within the NWTC is important, but the way we behave is equally important to our patients, customers, visitors and colleagues. We know this from feedback we get from patients and customers, for example in “thank you” letters and the complaints we receive.

Recognising this, the NWTC have worked with a range of staff, patient representatives and managers to discuss and promote our shared values which help us all to deliver the highest quality of care and service across the organisation. These values are closely linked to our responsibilities around Equality.

Our values are that we will:

- Take responsibility for doing our own job well
- Treat everyone we meet in the course of our work with dignity and respect
- Demonstrate through our actions our commitment to quality
- Communicate effectively, working with others as part of a team
- Display a “can do” attitude at every opportunity.

Our policies are intended to support the delivery of these values which support employee experience.

1. Purpose and 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.

The National Waiting Times Centre Board (NWTCCB) has 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 the NWTCCB at the various stages of employment.

This Policy applies to all professional staff within the NWTCCB, 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 the NWTCCB has in place for employee practice.

2. Policy Statement

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.

The NWTCCB 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 HR Department. In such instances, NWTCCB HR Policies will be adhered to, in

respect of ensuing investigation of complaints, capability, and/or staff conduct issues.

Where there are concerns relating to an individual's suitability to be on the professional register, NWTCB 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. Any employee who is referred to their professional body as a result of concerns or complaints will be advised of the reason for the referral in writing, prior to the referral being made.

All referrals made to the Nursing and Midwifery council will be in line with the NWTCB Nursing and Midwifery Referral Guidance. A copy of this document can be found at : [insert link when available](#)

Equality and Diversity Impact Assessment

The NWTCB 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.

3. 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 the NWTCB may engage to supply staff on an ad-hoc basis.

4. Responsibilities and Organisational Arrangements

Recruitment & Selection

All adverts for positions within the NWTCB 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. NWTCB 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.

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

Offers of employment will be subject to successful candidates being appropriately registered with the relevant professional body. The Human Resources department will be required to check with the relevant professional body that the registration is current on commencement of employment. **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.

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

6. Management of Professional 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 are responsible for generating a departmental registration monitoring report from HR.net / eESS on a monthly basis to determine registration expiry dates. Prior to the registration expiry date, checks should be made via the appropriate professional body's website to confirm employee's registration status.

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 / eESS
- 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.
- Ensure employees are renewing their registration in a timely manner, particularly when employees renew their registration every three years ('periodic renewal').
- 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 the NWTCTB have a duty to maintain their registration status during the course of their employment. Employees must also ensure their registration status is maintained during any periods of absence or leave, ie sickness, maternity (paid and unpaid) or annual leave. 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.
- Renew registrations in a timely manner
- 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, name change, 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 / eESS.
- Report any failure to re-register with their professional body to their line manager immediately.

Human Resources

Human Resources will ensure that professional employee's registrations are up to date at commencement of employment. Support will be provided to department managers on an ongoing basis to ensure that managers have an auditable and robust system in place to ensure timely review of all professional registrations for employees within their respective departments.

In the event of lapsed registrations, Human Resources will support department managers investigate any employee that has failed to renew their registration within the appropriate timeframe, in line with the NWTCCB Management of Employee Conduct Policy

HR will screen professional bodies' reports sent to NWTCCB which identify all professional staff removed from the register, where conditions of practice have been awarded or where misconduct is being investigated. The professional lead or, for nursing staff, the Director of Nursing and the Senior Nurse Managers will be informed of any NWTCCB employee identified in such reports

Third Party Contractors

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

Bank Staff

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

7. 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 may 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. Whilst we are confident that our procedures for managing professional registrations are robust, in the event that an employees' registration has lapsed, and they have been working during this period, the employee may be asked to repay any remuneration they have received during this time. All lapses in professional registration are considered a breach of employees' contractual terms of employment.

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, securing 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 will be communicated to the employee in writing. Payroll should also be notified that the employee has been placed on unpaid leave to ensure the individual does not receive payment during this period.

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 order to fully establish the reasons as to why an employee's registration has lapsed, the manager must conduct a full investigation in line with the NWTCB

Management of Employee Conduct Policy. Disciplinary action may be appropriate having regard to the employee's culpability in failing to renew. In such instances, advice should be taken from the Human Resources Department before initiating a full investigatory procedure.

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 Head of Operations

Professional Registration Bodies

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