



Better health and sustainable healthcare for Bristol

Professional Registration Policy and Procedure

Professional Registration Policy and Procedure

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Date Approved	July 2014
Approved by	Quality and Assurance Committee
Date of next review	July 2017
How is policy to be disseminated	All staff

Check list for Governing Body/approving committee	
Has an Equality Impact Assessment been completed?	Yes
Has legal advice been sought?	No
Have training issues been addressed?	Yes
Are there financial issues and have they been addressed	Yes
How will implementation be monitored	Through the SWCSU HR Team
How will the policy be shared with: <ul style="list-style-type: none"> • Staff • Patients • Public 	Via the Bristol CCG internet site and dedicated communication to Bristol CCG employees.
Are there linked policies and procedures	

Contents

1	Statement of Policy	1
2	Who does this policy apply to?.....	1
3	Independent Contractors registration responsibilities	2
4	Who is not covered by this policy?	2
5	What are my responsibilities as a staff member?	2
6	What are my responsibilities as a Line Manager?.....	2
7	Validation of Professional Registration for new members of staff	3
8	Maintaining Professional Registration	3
9	Help and advice available for employees.....	4
10	Statement of Compliance with the Equality Act 2010	4
11	Counter Fraud.....	4
12	Review	4

1 Statement of Policy

It is the policy of Bristol Clinical Commissioning Group (CCG) that all members of staff and independent contractors who have a statutory requirement to be registered in order to practise their profession on behalf of the CCG must be appropriately registered at all times.

2 Who does this policy apply to?

The following staff groups (including permanent and temporary staff) are required to hold professional registration and are covered by this policy:

Staff Group	Professional Regulatory Body	Renewal Details
Registered Nurses and Midwives	Nursing & Midwifery Council www.nmc-uk.org 0207 333 9333	Yearly Renewal date varies by individual.
Physiologists / Audiologists	Registration Council for Clinical Physiologists www.rccp.co.uk Due to become part of Health Professions Council www.hpcheck.org	Voluntary at present
Medical Staff	General Medical Council www.gmc-uk.org 0161 923 6602 registrationhelp@gmc-uk.org	Yearly Renewal date varies by individual.
Dental Staff / Dual Specialty with Restorative Dentistry	General Dental Council www.gdc-uk.org 0207 887 3800	Yearly Renewal date varies by individual.
Occupational Therapists	Health Professions Council www.hpcheck.org 0845 300 4472 or 0207 840 9802 registration@hpc-uk.org	Every 2 years
Biomedical/Clinical Scientists	Health Professions Council www.hpcheck.org 0845 300 4472 or 0207 840 9802 registration@hpc-uk.org	Every 2 years
Radiographers	Health Professions Council www.hpcheck.org 0845 300 4472 or 0207 840 9802 registration@hpc-uk.org	Every 2 years
Pharmacists	General Pharmaceutical Council www.pharmacyregulation.org	Yearly 01 January

Staff Group	Professional Regulatory Body	Renewal Details
Pharmacy Technicians	General Pharmaceutical Council www.pharmacyregulation.org	Yearly 01 January
Physiotherapist	Health Professions Council www.hpcheck.org 0845 300 4472 or 0207 840 9802 registration@hpc-uk.org	Every 2 years.

3 Independent Contractors registration responsibilities

Independent Contractors who require professional registration (as above) must be appropriately registered at all times in order to undertake any work on behalf of the CCG.

4 Who is not covered by this policy?

Members of staff who do not require professional registration to practise their job.

5 What are my responsibilities as a staff member?

New members of staff are required to provide evidence of their professional registration and qualifications prior to commencement with the CCG. This process is managed by the Recruitment Service and is outlined in the Recruitment Policy and Procedures Guide.

Individual members of staff have a responsibility to ensure that their registration is always current. Individual members of staff are required to provide their manager or the Human Resources Team with evidence of their registration and revised expiry date on renewal of registration on request. Failure to provide evidence of continuing registration puts the member of staff in breach of contract, which will mean suspension from duty without pay and may also result in formal action under the Disciplinary Procedure. This may result in dismissal.

Failure to maintain registration may be construed as a fundamental breach of contract of employment by the member of staff.

6 What are my responsibilities as a Line Manager?

Line Managers must ensure that individual members of staff within their area of responsibility are duly qualified and registered to practise, and to act to prevent members of staff from working illegally. Managers are encouraged to check that registration is current during annual Personal Development Reviews (PDRs) with staff.

Other than when confirmation of registration is delayed through the administrative problems of the Professional Body, members of staff who fail to maintain their registration will be prevented from practising with immediate effect until such time that evidence of registration is provided. Managers will verify the validity of documentary evidence with the relevant professional body. This can be done online.

7 Validation of Professional Registration for new members of staff

All new staff covered by this policy will be required to provide proof of registration to the Recruitment Department at a "Documentation meeting" prior to commencement of employment. Copies of relevant documents will then be placed on the members of staff's personal file, registration numbers and expiry dates will be recorded on a database and the originals returned. New members of staff failing to provide evidence of registration will not be allowed to commence duties as a qualified practitioner. In some circumstances (e.g. newly qualified nurses) staff may commence on a lower grade in a supervised, non-registered role.

Validity of all professional registrations will, in addition to the above, be confirmed directly with the relevant statutory body confirmation service prior to commencement. An online confirmation service is provided by the NMC, HPC, Royal Pharmaceutical Society of Great Britain, GMC and GDC in order to facilitate this.

8 Maintaining Professional Registration

The following procedures are in place to ensure that all CCG staff who are required to be professionally registered to carry out their duties are maintaining current registration:

- The Workforce Team will run a monthly report for the Human Resources Team who will contact staff individually to notify them that they are due to renew their registration and request that they provide proof of renewal.
- Staff are required to provide evidence of renewed registration to the Human Resources Team. Renewed registration details are then input into the computer system and the photocopies stored on the member of staff's personal file.
- If evidence of renewal is not received the Human Resources Team will contact the relevant line manager. On receipt of such notification, the line manager must act immediately. This may mean temporarily redeploying the member of staff to an area where they are not able to practise any professional duties and they would then be paid in accordance with the work they are carrying out. Alternatively the member of staff may choose to take annual leave to cover this period. If this is not possible, or more than a week elapses, the member of staff should be suspended from duty without pay. They would normally be informed of this by a meeting with their manager, a Human Resources Advisor and a Trade Union Representative or colleague not acting in a legal capacity.
- The member of staff will remain suspended without pay until such time that evidence of registration can be provided. Whilst a reasonable time will be allowed to re-register, an extended period e.g. a month would be an unacceptable breach bringing the contract of employment to an end. It is therefore in the members of staff's interests to ensure that their line manager is briefed on progress.
- Failure by a member of staff to comply with registration requirements may also result in formal action under the Disciplinary Policy.
- If having followed this procedure the member of staff is still unable to provide evidence of continuing registration, the member of staff will be

in breach of their employment contract and their employment will be terminated.

Failure on the part of managers to ensure their staff are appropriately registered may lead to disciplinary action against the manager.

9 Help and advice available for employees

If you know you have or know you may have a problem with your continuing registration you should tell your manager immediately.

If you have any queries regarding this validation process please contact your manager, Human Resources Team or a more senior professional colleague within the CCG.

You may also need to contact your 'professional organisation' who will advise you on their registration updating process

10 Statement of Compliance with the Equality Act 2010

All relevant persons are required to comply with this document and must demonstrate sensitivity and competence in relation to the nine protected characteristics as defined by the Equality Act 2010. The Act prohibits discrimination on the basis of age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex or sexual orientation. It also means that each manager or member of staff involved in implementing the policy must have due regard to the need to: eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity between those who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.

If you, or any other groups, believe you are disadvantaged by anything contained in this document please contact the Document Lead (author) who will then actively respond to the enquiry.

11 Counter Fraud

The CCG is committed to the NHS Protect Counter Fraud Policy – to reduce fraud in the NHS to a minimum, keep it at that level and put funds stolen by fraud back into patient care. Therefore, consideration has been given to the inclusion of guidance with regard to the potential for fraud and corruption to occur and what action should be taken in such circumstances during the development of this procedural document.

12 Review

This policy will be reviewed every 3 years but can be reviewed at any time if the CCG deems it necessary to do so or a review is requested by management or staff.

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May 2014