

Professional Registration Policy

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Summary	This policy outlines the rules around staff members who hold professional registration and how this is maintained for compliance purposes

Version	Date	Control Reason	Title of Accountable Person for this Version
v1	November 2019	Updated Policy	Medical Director
v2	December 2019	Updated and reviewed as appropriate	Human Resources Department
Reference Documents		Electronic Locations (Controlled Copy)	Location for Hard Copies
Consultation: Committees / Groups / Individual			Date
Quality and Workforce Committee			December 2019

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1.0 PURPOSE

As an employer and provider of patient care, PC24 has a responsibility to provide safe services to users, and to ensure professional standards are met.

By implementing this policy, the organisation will ensure that both pre and post-employment checks are carried out for all persons working in/for PC24, and to ensure as appropriate, that existing employees are registered with their relevant regulatory/licensing body i.e. GMC, NMC, to enable them to continue to practice.

2.0 SCOPE OF THE POLICY

As a duty to protect the public and ensure high standards of care, it is a legal requirement that PC24 may only employ registered practitioners in qualified practicing positions.

Individuals who are not employed by PC24 e.g. agency, temporary workers, volunteers, students and trainees, but who nevertheless are engaged in work that requires professional registration, must also hold current registration. PC24 will ensure that there are processes in place to check the ongoing registration of such workers.

This policy should be read in conjunction with PC24's Recruitment & Selection Policy and Procedure.

3.0 RESPONSIBILITIES

Directors - must ensure that the responsible people within the policy carry out their roles, and adherence to this policy is applied.

Line Managers - are responsible for the day to day implementation of the policy and procedure which includes:

- Applying the principles of the policy fairly and equitably
- With advice from HR, deal appropriately with any employees whose registration is found to have lapsed during employment
- Report any concerns, that may impact on a practitioner's registration to the Medical Director or Director of Nursing, or their nominated deputies, to consider if the matters need to be referred to the appropriate regulatory body
- To remind staff that it is the ultimate responsibility of all employees who require professional registration to practice, to ensure that their registration with their professional body is up to date, and that they abide by the relevant Professional Code of Conduct

Recruitment Manager (and Line Manager) - is required to ensure that:

- Each member of staff is made aware of the policy and their obligations within it
- Follow the procedure in the Recruitment and Selection Policy
- Prior to commencement of employment, the employee has a registration on the relevant part(s) of their register
- When contacting suppliers of staff such as agencies the Recruiting Manager or Line Manager will ensure all relevant workers fulfil all legal and regulatory requirements relating to professional registration. This will include obtaining written assurance documentation from the organisation supplying the worker
- Ensure all agency staff have the relevant documentation in line with PC24's checklist for agency workers (Appendix 1)

HR Department - will be responsible for specific elements of the procedure relating to permanent and temporary staff, which includes:

- The implementation of the policy and procedure by providing training and guidance to Line Managers and staff

- Verifying that the professional registration details are in line with post-employment requirements upon recruitment
- Retaining copies of the professional registration certificate on the personnel file
- Providing advice and guidance to Managers on the policy and to support with the procedures where lapses are identified
- Recording and maintaining accurate records on the workforce information system
- Producing bi-monthly reports on those professionally registered staff that is due for renewal within 3 months
- To audit compliance with this procedure

Employees - who require professional registration to practice, are ultimately responsible to ensure that registration with their professional body remains current at all times, and that they abide by their professional code of conduct. Employees/contractors must disclose to PC24 any conditions attached to his/her registration at the earliest available opportunity.

During the course of their employment employees must, on request by Management, provide evidence that their registration has been renewed in accordance with the procedures laid down. They must also provide proof of renewal to their Line Manager.

Employees are reminded that all personal data, particularly name changes, must be communicated to both their Manager and professional body to ensure accuracy of data.

Failure to comply with maintaining professional registration or to act in accordance with this policy may result in disciplinary action being taken under the Disciplinary Policy and Procedure.

Contractors/Temporary staff from external agencies - must fully meet all legal and regulatory requirements. These include but are not

limited to, the Data Protection Act (1998), PC24 Confidentiality Code of Practice, all DBS requirements, registration with the appropriate professional bodies where appropriate, confirmation of Fitness to Work, Home Office status if applicable, and working with WTD Regulations (Working Time Directive 1992 and Working Time Regulations 1998).

In this respect, the onus must be placed on the supplier (Contractor/Agency) to ensure all relevant workers fulfil all legal and regulatory requirements. PC24 will ensure it is protected contractually in the event of a supplier not fulfilling these obligations. The approved check sheet for agency staff is to be used to ensure compliance.

4.0 DEFINITIONS

Professional registration – ensures that those who practice a health profession do so safely and conduct themselves in an appropriate manner providing a good standard of care for patients at all times.

For the purpose of this policy, the term professional registration refers to all posts which require the employee to be qualified in their field as a requirement of their post, and to periodically renew their registration with their respective professional body:

- Salaried and Associate GP's will be checked against the General Medical Council (GMC) and this is a requirement of continued employment
- Nursing staff will be checked against the Nursing Midwifery Council and this is a requirement of continued employment. Nursing staff must also retain a membership of a recognised professional organisation e.g. Royal College of Nursing (RCN)
- Other health care professionals are checked against their relevant body e.g. pharmacist

Alert Notices/Letters - is a Healthcare Professional Alert Notice (HPAN) system, which notifies NHS organisations and other bodies providing NHS services of concerns relating to a healthcare professional, (or a person holding him/herself out to be a healthcare professional) who:

- Poses a significant risk of harm to patients, staff or the public
- May continue to work or seek additional or other work in the NHS as a healthcare professional, and
- There is a pressing need to issue an alert notice

5.0 PROFESSIONAL REGISTRATION POLICY PROCEDURES

The procedures within this policy, provides a framework, for ensuring that all permanent and temporary healthcare professionals meet the legal requirements for holding their professional registration prior to joining PC24, and maintaining them during their employment within the organisation.

5.1 Procedure for checking registration pre-employment

All successful candidates who have a professional registration with a licensing or regulatory body in the UK or another country, relevant to their role, are required to provide documentary evidence of up to date registration prior to appointment. The HR Department will check with the relevant regulatory body, e.g. GMC, to determine that the registration is valid, that there is no restriction to the individual's registration, and there are no pending investigations into their fitness to practice.

For posts requiring professional registration when issuing a Conditional Offer Letter, the HR Department will check the successful candidate is not on the alert letter database maintained within the HR Department.

NHS Resolution (formerly NCAS) are responsible for considering, issuing and revoking alerts. Alert letters are sent to organisations to make them aware of a registered health professional whose performance or conduct could place service users or staff at serious risk. Alert letters are communicated for those health professionals who are regulated by one of more of the following regulatory bodies:

- General Medical Council
- Nursing and Midwifery Council
- Health and Care Professions Council
- General Dental Council
- General Optical Council
- The General Pharmaceutical Council (GPhC)
- General Chiropractic Council
- General Osteopathic Council

The HR Department is responsible for responding to alert letters, in accordance with the Healthcare Professionals Alert Notice Directions 2006, and should be done so in the strictest of confidence. They must ensure that they transfer alert letter details to a secure database, and retain paper copies within a safe place, which is locked and only accessible to a limited number of staff.

The HR Department is responsible for cross-referencing job offers to registered health professionals with the relevant professional body. If the HR Department is unable to verify registration with the relevant professional body, the Recruitment/ Manager will be notified.

If a healthcare professional is the subject of a disciplinary or capability matter, which could potentially lead to a request for an Health Professionals Alert Notice and the individual leaves the organisation before the matter is concluded, the disciplinary or capability procedure should still be completed and a decision made on the outcome, including whether to request an Health Professionals Alert Notice

and/or refer the case to the professional's regulatory body. The healthcare professional shall be informed of the outcome in writing.

5.2 Procedure for monitoring ongoing registration

The HR Department will produce a bi-monthly report of all professionally registered staff that is due for renewal within the forthcoming 3 month period, checking against the relevant registers and updating internal records. Any non-compliance by staff members will be cascaded to relevant Managers to action accordingly. It is the relevant staff member's responsibility to ensure they are appropriately registered.

5.3 Procedure for dealing with lapsed registrations

When a lapsed registration has been identified, immediate action must be taken. In these circumstances the Manager and HR Department must make a decision about the options available during this time. The immediate actions will include:

- Contacting the member of staff
- Ensuring that the person is withdrawn from undertaking the duties of a qualified professional with immediate effect
- Discussing the options with both HR and the employee
- Checking re-registration with the relevant regulatory body

When considering action to be taken, Management will take account of the following factors:

- The length of time since registration has lapsed
- Any reasons put forward for non-renewal
- Whether the individual has knowingly continued to practice without registration and has failed to notify their Line Manager
- Any previous occasions when the individual has allowed their registration to lapse

- Whether the individual has attempted to conceal the fact that their registration has lapsed

The Line Manager, in consultation with HR, will consider the following options:

- Allow the individual to take annual leave or time owing until their registration is renewed within an agreed time frame
- Allow the individual to take unpaid leave where no annual leave is available
- Suspend the individual from duty without pay, as they are unable to fulfil the terms and conditions of employment
- Invoke the disciplinary process

5.3.1 Employees - who recognise that their registration has lapsed, must take immediate action to:

- Inform their Line Manager
- Re-register with the relevant professional body
- Withdraw from professional practice with immediate effect, in discussion with their Line Manager
- Provide proof of renewal to the Line Manager
- Provide proof and clarification of registration number if there is a discrepancy in data

5.4 Implementation

A copy of this policy will be available on the intranet. Awareness of this policy and its contents will be brought to the attention of all relevant staff who must maintain registration of a professional body.

6.0 RELATED POLICIES

Disciplinary Policy PC24POL14

Recruitment and Selection Policy PC24POL12

7.0 MONITORING COMPLIANCE

Professional Registration will be checked during pre-employment. This will then be monitored regularly by the HR department and reported on bi-monthly to board, with any lapses reported to the appropriate manager

8.0 INFORMATION, INSTRUCTION AND TRAINING

No formal training is required for the implementation of this policy. All staff members will be made aware of the policy during pre-recruitment and any changes will be communicated to them.

All managers will be supported by the HR department in the implementation of this policy.

9.0 EQUALITY AND HEALTH INEQUALITIES

PC24 is committed to an environment that promotes equality and embraces diversity in its performance as an employer and service provider. It will adhere to legal and performance requirements and will maintain equality and diversity principles through its policies, procedures and processes. This policy has been implemented with due regard to this commitment. To ensure that the implementation of this policy does not have an adverse impact in response to the requirements of the Equality Act 2010 this policy has been screened for relevance during the policy development process and a full equality impact analysis conducted where necessary. PC24 will take remedial action when necessary to address any unexpected or unwarranted disparities and monitor practice to ensure that this policy is fairly implemented.

10.0 PERSONAL INFORMATION

This policy complies with the Data Protection Act 2018. Therefore no Privacy Impact Assessment is necessary.

11.0 MAIN REFERENCES

Maintaining High Professional Standards in the Modern NHS

GMC Good Medical Practice 2018

NMC Code

Healthcare Professionals Alert Notice Directions 2006



Equalities and Health Inequalities – Screening Tool

Version number: V1

First published: November 2016

To be read in conjunction with Equalities and Health Inequalities Analysis Guidance, Quality & Patient Safety Team, Urgent Care 24, 2016.

Prepared by: Quality & Patient Safety Team.

Introduction

The purpose of this Screening Tool is to help you decide whether or not you need to undertake an Equality and Health Inequalities Analysis (EHIA) for your project, policy or piece of work. It is your responsibility to take this decision once you have worked through the Screening Tool. Once completed, the Head of your SDU or the Quality & Patient Safety Team will need to sign off the Screening Tool and approve your decision i.e. to either undertake an EHIA or not to undertake an EHIA.

The Quality and Patient Safety Team can offer support where needed. It is advisable to contact us as early as possible so that we are aware of your project.

When completing the Screening Tool, consider the nine protected characteristics and how your work would benefit one or more of these groups. The nine protected characteristics are as follows:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

A number of groups of people who are not usually provided for by healthcare services and includes people who are homeless, rough sleepers, vulnerable migrants, sex workers, Gypsies and Travellers, Female Genital Mutilation (FGM), human trafficking and people in recovery. Urgent Care 24 will also consider these groups when completing the Screening Tool:

The **guidance** which accompanies this tool will support you to ensure you are completing this document properly. It can be found at: <http://extranet.urgentcare24.co.uk/>

Equality and Health Inequalities: Screening Tool

A

General information

A 1	Title: What is the title of the activity, project or programme? Professional Registration Policy			
A2.	What are the intended outcomes of this work? To ensure that relevant staff members who require professional registration maintain this, that there is a process for monitoring this and there are consequences identified for the non-compliance of this policy			
A3.	Who will be affected by this project, programme or work? All staff			
B	The Public Sector Equality Duty			
B 1	Could the initiative help to reduce unlawful discrimination or prevent any other conduct prohibited by the Equality Act 2010? If yes, for which of the nine protected characteristics (see above)? <table border="1" data-bbox="363 808 1442 853"> <tr> <td></td><td>No</td><td></td></tr> </table> Summary response and your reasons:		No	
	No			
B 2	Could the initiative undermine steps to reduce unlawful discrimination or prevent any other conduct prohibited by the Equality Act 2010? If yes, for which of the nine protected characteristics? If yes, for which of the nine protected characteristics? <table border="1" data-bbox="363 1106 1442 1151"> <tr> <td></td><td>No</td><td></td></tr> </table> Summary response and your reasons:		No	
	No			
B 3	Could the initiative help to advance equality of opportunity? If yes, for which of the nine protected characteristics? <table border="1" data-bbox="363 1285 1442 1330"> <tr> <td></td><td>No</td><td></td></tr> </table> Summary response and your reasons:		No	
	No			
B 4	Could the initiative undermine the advancement of equality of opportunity? If yes, for which of the nine protected characteristics? <table border="1" data-bbox="363 1487 1442 1532"> <tr> <td></td><td>No</td><td></td></tr> </table> Summary response and your reasons:		No	
	No			
B 5	Could the initiative help to foster good relations between groups who share protected characteristics? If yes, for which of the nine protected characteristics? <table border="1" data-bbox="363 1733 1442 1778"> <tr> <td></td><td>No</td><td></td></tr> </table> Summary reasons:		No	
	No			
B 6	Could the initiative undermine the fostering of good relations between groups who share protected characteristics? If yes, for which of the nine protected characteristics?			

		No	
	Summary response and your reasons:		
C	The duty to have regard to reduce health inequalities		
C 1	Will the initiative contribute to the duties to reduce health inequalities?		
	Could the initiative reduce inequalities in access to health care for any groups which face health inequalities? If yes for which groups?		
		No	
	Summary response and your reasons:		
C 2	Could the initiative reduce inequalities in health outcomes for any groups which face health inequalities? If yes, for which groups?		
		No	
	Summary response and your reasons:		
D	Will a full Equality and Health Inequalities Analysis (EHIA) be completed?		
D 1	Will a full EHIA be completed? Bearing in mind your previous responses, have you decided that an EHIA should be completed? Please see notes. ¹ Please place an X below in the correct box below. Please then complete part E of this form.		
			No
E	Action required and next steps		
E 1	If a full EHIA is planned: Please state when the EHIA will be completed and by whom. Name: Date:		
E 2	If no decision is possible at this stage: If it is not possible to state whether an EHIA will be completed, please summarise your reasons below and clearly state what additional information or work is required, when that work will be undertaken and when a decision about whether an EHIA will be completed will be made. Summary reasons:		

¹ Yes: If the answers to the previous questions show the PSED or the duties to reduce health inequalities are engaged/in play a full EHIA will normally be produced. No: If the PSED and/or the duties to reduce health inequalities are not engaged/in play then you normally will not need to produce a full EHIA.

	<p>Additional information required:</p> <p>When will it be possible to make a decision about an EHIA?</p>
E 3	<p>If no EHIA is recommended:</p> <p>If your recommendation or decision is that an EHIA is not required then please summarise the rationale for this decision below.</p> <p>Summary reasons:</p>

F	<i>Record Keeping</i>		
Lead originator:	P Mullen	Date:	Nov 2019
Director signing off screening:		Date:	
Directorate:		Date:	
Screening published:		Date:	