

# PROFESSIONAL REGISTRATION CHECKS POLICY & PROCEDURE

<b>Approved By:</b>	<b>Policy &amp; Guideline Committee</b>
<b>Date Approved:</b>	<b>10 November 2008</b>
<b>Trust Reference:</b>	<b>B64/2008</b>
<b>Version:</b>	V8
<b>Supersedes:</b>	V7 – March 2021
<b>Author / Originator(s):</b>	Roisin Ryan, Assistant HR Business Partner
<b>Name of Responsible Committee/Individual:</b>	Chief People Officer
<b>Latest Review Date</b>	19 November 2021 – Policy and Guideline Committee
<b>Next Review Date:</b>	<b>May 2025</b>

## **CONTENTS**

<b>Section</b>		<b>Page</b>
<b>Review Dates and Details of Changes Made During The Review</b>		<b>3</b>
<b>Key Words</b>		<b>3</b>
<b>Summary</b>		<b>3</b>
<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>Policy Aims</b>	<b>4</b>
<b>3</b>	<b>Policy Scope</b>	<b>4</b>
<b>4</b>	<b>Roles and Responsibilities</b>	<b>4 - 5</b>
<b>5</b>	<b>Procedure and Associated Documents</b>	
	5.1 Pre-employment procedures for non-medical appointments	<b>6</b>
	5.2 Pre-employment procedures for medical appointments	<b>6</b>
	5.3 Newly registered nurses, midwives and nursing associates	<b>7</b>
	5.4 Other newly-registered professionals	<b>7</b>
	5.5 Ongoing monitoring of registrations during employment	<b>7</b>
	5.6 Individual non-medical professional registration checks	<b>8</b>
	5.7 Medical registration checks ongoing monitoring	<b>9</b>
	5.8 Bank/Agency/Locum ongoing monitoring	<b>10</b>
	5.9 Lapsed professional registration	<b>10</b>
	5.10 Alert Notices	<b>11</b>
<b>6</b>	<b>Education and Training</b>	<b>11</b>
<b>7</b>	<b>Process for Monitoring Compliance</b>	<b>11</b>
<b>8</b>	<b>Equality Impact Assessment</b>	<b>12</b>
<b>9</b>	<b>Supporting References, Evidence Base and Related Policies</b>	<b>12</b>
<b>10</b>	<b>Process for Version Control, Document Archiving and Review</b>	<b>13</b>

<b>Appendices:</b>		<b>Page</b>
<b>1</b>	<b>Procedure Flowchart for Administration / Monitoring</b>	<b>14</b>
<b>2</b>	<b>Process for checking payment of NMC retention fee and NMC revalidation status</b>	<b>15</b>
<b>3</b>	<b>Notice of possible professional registration expiry e-mail</b>	<b>16</b>
<b>4</b>	<b>Final e-mail notice of probable expiry of professional registration</b>	<b>17</b>
<b>5a</b>	<b>E-mail confirmation of expiry of professional registration</b>	<b>18</b>
<b>5b</b>	<b>Letter to non-medical staff concerning expiry of professional registration- non medical staff</b>	<b>19</b>
<b>5c</b>	<b>Letter to NMC registered staff concerning expiry of professional registration</b>	<b>20</b>
<b>6</b>	<b>Letter to medical staff concerning expiry of professional registration- medical staff</b>	<b>21</b>
<b>7</b>	<b>Letter to medical staff concerning failure to renew professional registration within the 56 day grace period - medical staff</b>	<b>22</b>

<b>8</b>	<b>Professional Registration Requirements Table</b> Registered Nurses and Midwives Operating Department Practitioners Physiologists / Audiologists Hospital Play Specialists Medical Staff Medical Staff / Dual Speciality Restorative Dentistry Occupational Therapists Pharmacists Pharmacy Technicians Physiotherapists Radiographers Scientists - Biomedical Scientists – Clinical Optometrists Orthoptics Dental Nurses / Dental Hygienists / Orthodontic Therapists Dental Technicians Prosthetists Dieticians	<b>23 – 24</b>
----------	--	--------------------

## **REVIEW DATES AND DETAILS OF CHANGES MADE**

April 2016

- Change to process for NMC registrants in line with new revalidation process
- Inclusion of responsibilities for Electronic Rostering team

August 2019

- Changes to job titles and names of responsible leads

March 2021

- Correction of typos
- Clarification of role of the Recruitment team, HR Transactional team and Medical Staffing
- Clarified throughout that bank workers fall within the scope of this policy
- Removed repeated references to disciplinary procedures
- Removed references to the Governance Team automatically paying staff at the highest unqualified grade unless otherwise advised by the manager (Section 5.7)
- Included reference to HPAN (Section 5.8.1)
- Included detail about international nurses starting at Band 3 while awaiting their NMC PIN (Section 5.9.1)
- Clarified the functionality of the ESR interface with NMC, GDC, GMC and HCPC registers

November 2021

- Included detail about financial professional registrations (CIPFA, ICAEW, CCA, CIMA).

## **KEY WORDS**

Professional Registration, Registration, Expired, Lapsed, Code of Conduct, Re-registration

## **1. INTRODUCTION**

- 1.1.1 The verification of the registration status of all registered professionals is essential to ensure that UHL NHS Trust (the 'Trust') and the public can be confident that all staff are appropriately qualified, registered with the relevant professional body and meet statutory registration requirements and NHS Employment Check Standards.
- 1.1.2 This policy defines the process of checking professional registrations at pre-employment, actions required at the time of renewal and the implications of lapsed registration.

## **2 POLICY SCOPE**

- 2.1 This policy and its associated procedures apply to undertaking professional registration checks on every prospective employee and employees' in ongoing NHS employment. This includes permanent staff, staff on fixed term contracts, volunteers, students, trainees, bank workers, unpaid placements / honorary contracts, contractors and staff supplied by agencies. Please refer to the Trust's Temporary Staffing policy (B58/2011) in relation to agency and bank staff and the Trust's Unpaid Placement policy (B8/2019) in relation to unpaid placements / honorary contracts.

## **3 DEFINITIONS AND ABBREVIATIONS**

- 3.1 **GDC:** General Dental Council  
**GMC:** General Medical Council  
**GOC:** General Optical Council  
**GPhC:** General Pharmaceutical Council  
**HCPC:** Health & Care Professions Council  
**NMC:** Nursing & Midwifery Council  
**HPAN:** Healthcare Practitioner Alert Notice  
**ESR:** Electronic Staff Record  
**CIPFA:** Chartered Institute of Public Finance and Accountancy  
**ICAEW:** Institute of Chartered Accountants in England & Wales  
**ACCA:** Association of Chartered Certified Accountants  
**CIMA:** Chartered Institute of Management Accountants

## **4 ROLES AND RESPONSIBILITIES**

### **4.1 The Chief People Officer**

- Responsible for Implementing, monitoring and reviewing this policy and procedure.

### **4.2 CMG Professional Heads, Heads of Service, Heads of Nursing / HoN & Midwifery, Managers and Supervisors are responsible for:**

- Ensuring that regulation and registration requirements are defined within the essential specifications of the post job description
- Ensuring that all reasonable steps are taken to adhere to this policy during the recruitment process and to validate an individual's professional registration and scope of registered practice.
- Ensuring this policy is implemented and monitored within their area of responsibility
- Ensuring that there are robust local systems in place in all operational areas to support the effective maintenance and management of active registration by every employee who is required to be registered (registrants) including maintaining up to date knowledge of current registration status of their registrant employees
- Ensuring that appropriate action is taken to manage registrants where their active registration has lapsed, where they are unable to renew registration or where there are concerns regarding maintenance or renewal of registration

#### 4.3 **The Employee/Worker**

- Upon appointment, staff are required to provide evidence of qualifications for any registered role they are employed / engaged to undertake with the Trust and on-going evidence of registration
- Where revalidation with the professional body is also a mandated requirement; this should include (where information is available) date first registered with the professional body, any periods where registration may have lapsed and evidence of any return to practice approved including courses that have been successfully completed as a condition of registration with the professional body.
- Once appointed to a role, employees/workers are personally responsible for taking appropriate actions to maintain their active registration, through compliance with regulatory standards, completing professional practice and development requirements and submitting administrative information and payment in a timely manner to their professional regulatory body.
- It is the individual's responsibility to maintain their registration requirements and revalidation with their professional body (including as stipulated in their contract of employment / bank worker agreement and their respective professional code of conduct.
- It is the employee/worker's responsibility to maintain their registration to practice including during periods of annual leave, maternity, career break and long term absence and to notify regarding changes of address.
- If employees/workers change their registration due to a change of name, anything signed for in a professional capacity must be in their original name until their new registration status/PIN card has been received and verified.
- The employee/worker is required to immediately notify their line manager if there is any impediment to maintenance or renewal of their registration or where they have allowed valid registration to lapse for whatever reason. Bank workers are required to inform the Central Bank Office.

#### 4.4 **The Resourcing (Recruitment Services) Lead**

- Responsible for ensuring that appropriate systems are designed, updated, monitored and audited to ensure compliance in accordance with this policy.

#### 4.5 **Recruitment Services and Central Staff Bank**

- Responsible for ensuring that registration checks are completed at the pre-employment / engagement stage of the recruitment process and recorded.
- Responsible for liaising with Managers and clinical leaders to ensure that the policy is followed fairly and consistently.
- The following teams are responsible for the ongoing professional registration checks associated with the given professional bodies and to monitor and check all registrations via the ESR expiry report and report any concerns to the appropriate professional lead for action:
  - GMC, GDC – Medical Staffing
  - HCPC, GOC, GPhC, Finance professional bodies – Non-Medical Recruitment Team

#### 4.6 **Corporate Nursing Directorate Team**

- Responsible for the ongoing professional registration checks associated with the NMC and to monitor and check all NMC registrations on a monthly basis via the ESR expiry report (or alternatively any ESR system notifications received) and report any concerns to the CMG Head of Nursing and Deputy Head of Nursing for action.

#### 4.7 **People Services Team**

- Responsible for supporting managers where an individual's registration has lapsed and they are not able to fulfil their contract of employment.

#### 4.8 **The Workforce Information Team**

- Responsible for producing Electronic Staff Record (ESR) monthly reports on professional registration expiry dates.

#### 4.9 **HR Systems and Payroll – Operations and Projects**

- Responsible for ensuring that professional registration information, including expiry dates are input into ESR as part of the new starter process at appointment/engagement and updated in accordance with this policy.
- Responsible for providing a weekly data extract for the Electronic Rostering team to upload into the Electronic Rostering system.

#### 4.10 **Electronic Rostering Team**

- Responsible for ensuring data extracts provided from ESR containing Professional Registration data including validity dates are re-uploaded every week within one day of receipt. Registered Professionals are not able to book into Temporary Staffing duties if their registration has lapsed on the Bank Staff and Employee Online electronic rostering systems.

### 5 **POLICY STATEMENTS, PROCEDURE AND ASSOCIATED DOCUMENTS**

#### 5.1 **Pre-employment Procedure for Non-Medical Appointments**

- 5.1.1 Any requirement to hold professional qualifications must be explicit in the job description for a role.
- 5.1.2 Individuals must not commence in any post for which it is a requirement to be professionally registered, unless checking has confirmed the current and appropriate registration of the individual. Evidence of registration must be produced when the individual has been given a conditional offer of employment.

The Central Staff Bank must review relevant professional regulatory websites to ensure current and appropriate registration prior to the individual joining the central staff bank and ensure all staff working on the central staff bank that require professional registration have current and valid registration status and to ensure that all follow on actions as described in this policy are adhered to.

- 5.1.3 Before the Trust employs / engages any health professional they must always check the following areas:
- That the applicant is appropriately registered to undertake the proposed role and scope that the registration is current.
  - Whether the registration is subject to any current restrictions that might affect the duties proposed or conditions of practice.
  - If the applicant has investigations against them about their fitness to practise that the regulatory body has enforced the registrant has a duty to disclose to the employer in accordance with their code of professional conduct any conditions that have been mandated and are effective as a condition of their registration.
  - To provide information to the professional body where required in relation to the registrant to support their revalidation.

- 5.1.4 The checks will be completed for the successful candidate by Recruitment Services prior to their commencement date. A check of the individual's details must be made against the regulatory body's website, and a copy of the check must be placed on the individual's personal file on SharePoint. This check must also be recorded on ESR.
- 5.1.5 If registration is current at the time an offer is made, but employment is due to commence after registration has expired, the registration must be re-checked before the individual commences in post.
- 5.1.6 Registration details and expiry dates will be included on the new starter paperwork, for input on to ESR by the ESR Administration Team.

## **5.2 Newly Registered Nurses, Midwives and Nursing Associates**

- 5.2.1 Newly Registered Nurses, Midwives and Nursing Associates must have their NMC Registration prior to starting in post, with the exception of international nurses awaiting registration in the UK who commence as Band 3 Health Care Assistants.

## **5.3 Pre-employment Procedure for Medical Staff GMC / GDC**

- 5.3.1 The procedure for medical staff adheres to the same principles outlined in section 5.1. The following points should also be noted.
- 5.3.2 All doctors must hold a licence to practice.
- 5.3.3 Recruitment Services and the Staff Bank must ensure that a doctor's registration and licence status is checked prior to interview and when rotating between specialties.
- 5.3.4 Care will be taken when checking GMC and GDC certificates that any "exceptions" printed on the certificate are adhered to (e.g. no independent practice) and are made known to the supervising consultant.
- 5.3.5 Assurance must be sought that individuals working under honorary contracts, letters of access, and letters of authority are subject to the same rigorous checks as Trust employees and workers in order to protect patients in our care. Evidence of such checks must be maintained by Recruitment Services.
- 5.3.6 Some posts must not be undertaken by Doctors with provisional registration, such as Foundation training programme posts. Recruitment Services and the Staff Bank will ensure that Doctors are not appointed (and do not start work) in these posts.

## **5.4 Ongoing Monitoring of Professional Registration during Employment**

Regulatory bodies require their registrants to maintain active membership of the professional register usually with a periodic re-registration procedure (see **Appendix 8** which summarises the professional bodies' registration renewal dates).

An interface / data flow exists between the GMC, GDC, NMC and HCPC registers and the Electronic Staff Record (ESR) system which automatically updates when the registrant has renewed, subject to validation rules.

The Workforce Information Team utilise the Electronic Staff Record (ESR) System to produce regular, appropriately scheduled reports of registration renewal dates approaching expiry. These reports are sent to Recruitment Services, with the exception of NMC reports, which are sent to the Corporate Nursing Directorate.

The GMC allows a 56 day 'grace' period for Doctor's to renew their registration.

Utilising the regular reports from ESR, Recruitment Services / Corporate Nursing check the employee/worker's registration status against the relevant profession's website, for dates which are due to expire.

Appendix 1 shows a flow diagram of the professional registration checking process.

Appendix 2 shows a flow diagram of additional information for the NMC professional registration checking process.

## **5.5 Ongoing Monitoring of Professional Registration: Bank / Agency / Locum**

- 5.5.1 Bank staff requiring professional registration must provide their current registration details to the central bank office.
- 5.5.2 Under the conditions of the government procurement service agreement, the supply of all temporary agency professionals working in the NHS must have current registration with their regulatory body. Please refer to UHL's Temporary Staffing Policy (B58/2011).
- 5.5.3 Temporary Staffing duties requiring a professional registration cannot be booked into via the Electronic Rostering software (Bank Staff or Employee Online) by workers that do not hold an active/valid professional registration. The violation on the software restricts and controls temporary staff bookings.

## **5.6 Failure to Maintain Registration**

### **5.6.1 Reasons for lapses**

A registrant employee may fail to maintain registration due to:

- Being unable to meet the ongoing registration requirements (see relevant professional body website)
- Not completing the re-registration procedures in place with the regulatory or registration body
- Non-payment of registration or retention fees
- The professional body's own complaints and referrals procedures resulting in refusal to reregister or suspension or removal from the regulatory body's database

### **5.6.2 Lapsed Professional Registration**

Staff whose registration with their professional registration body has lapsed cannot practice in their professional capacity at all.

Allowing a clinical professional to practice without registration is likely to invalidate professional indemnity insurance.

Appendix 1 shows a flow diagram of the professional registration checking process.

Appendix 2 shows a flow diagram of additional information for the NMC professional registration checking process.

Template letters are included in appendices 3-7.

Any individual whose professional registration renewal cannot be confirmed on-line with the relevant professional body and is due to lapse will result in the following Professional Leads being contacted to alert them to this no later than seven days prior to the expiry (including weekends):



- The appropriate Head of Service Professional Lead / Head of Nursing / Head of Nursing & Midwifery being informed.
- The Professional lead for medical employees - the Medical Staffing Team Leader from Recruitment Services will contact the appropriate CMG Manager, CMG Medical Lead, Supervising Consultant/Head of Service, and JDA to take immediate action and to make arrangements to meet with the individual as soon as possible and agree an appropriate action plan in line with GMC standards.
- For all other registrant employees - once the professional lead / line manager is aware that registration has lapsed/is not able to be maintained through re-registration, arrangements will be made to meet with the registrant as soon as possible to discuss the situation and establish the facts of the registration lapse.
- In circumstances where the registrant is working and it is demonstrated they have failed in their responsibilities to maintain active registration, that registrant has made themselves unavailable for work in the post to which they were appointed. There are 5 options available to managers should it be identified that registration has lapsed:
  1. **Option 1 for NMC Registered Nursing and Midwifery Staff and registered Nursing Associates**  
NMC registered staff that have been confirmed as having lapsed registration will be suspended without pay until such time as re-registration is obtained (Template letters in Appendices 3 – 5C)
  2. **Option 2 for Non-Medical Staff including Allied Health Professionals (AHPs) (Not applicable to medical staff or NMC registrants)**  
With the agreement of the line manager the employee/worker will be paid on the highest unqualified grade and advised that they must work as such from midnight on the date of lapse until such time as re-registration can be confirmed by the Professional Body. During this time, the employee/worker will work in an unqualified capacity and will be paid at the appropriate grade (Template letters in Appendices 3 – 5C)
  3. **Option 3 for Medical and Non-Medical Staff (Not applicable to NMC registrants)**  
Agree with the employee/worker that they take annual leave until re-registration can be confirmed with the appropriate registering body. Payment during this time will be at the appropriate unqualified grade. Banding payments for Doctors will cease during the period of annual leave (Template letters in Appendices 6 – 7)
  4. **Option 4 for Medical & Non-Medical Staff (Not applicable to NMC registrants)**  
Agree with the employee/worker that they take unpaid leave until re-registration can be confirmed and there will be no reimbursement for the temporary loss of salary (Template letters in Appendices 3 – 7).
  5. **Option 5 for individuals whose registration has lapsed on a previous occasion (all staff groups)**  
The Trust will suspend without pay until such time as re-registration is obtained (Template letters in Appendices 3 – 7).

Consideration should also be given to reviewing any clinical work undertaken during the un-registered period to check for any clinical incidents.

Managers should contact the People Services Employee Relations Team for support when dealing with lapsed registrations.

- 5.9.3 All discussions will be documented and will include the action to be taken to ensure renewal of registration. A file note will be made in the registered employee's personal file and the necessary payroll paperwork completed to make any necessary salary adjustments.

The individual will need to provide evidence that registration renewal has been reinstated. Resolution of a lapsed registration is required immediately, but readmission to the register can take a number of weeks to process.

- 5.9.5 Failure to register or revalidate, where this is a requirement of the job role, is a serious act of misconduct which may be subject to disciplinary action up to and including dismissal.
- 5.9.6 For bank workers, lapses in registration will result in suspension from booking bank shifts.
- 5.9.7 Should registration lapse during a career break, it is the employee's responsibility to follow the relevant re-registration processes applicable to their professional body. The process above will still apply.

## 5.10 Alert Notices

- 5.10.1 An alert notice is a way of notifying NHS bodies, or other organisations providing services to NHS bodies, about registered health professionals whose performance or conduct could pose a significant risk of harm to patients, staff or the public. Alert notices are included on the Healthcare Practitioner Alert Notice (HPAN) system which is checked by the Recruitment Team for all professionally registered staff, and by the Central Staff Bank team for all bank-only appointments. Evidence of the HPAN check will be recorded on the individual's personal file on SharePoint.

## 6 EDUCATION AND TRAINING REQUIREMENTS

- 6.1 There are not any specific education and training requirements. Managers, Generalist People Services and the Recruitment Services team will raise awareness of this policy as required.

## 7 PROCESS FOR MONITORING COMPLIANCE

- 7.1 The audit criteria for this policy and the process to be used for monitoring compliance are given in the table below:

Element to be monitored	Lead	Tool	Frequency	Reporting arrangements	Acting on recommendations and Lead(s)	Change in practice and lessons to be shared
Ensuring all professional registration for new starters and those due for renewal each month have been checked	Resourcing Manager, Corporate Nursing Lead, Medical Staffing Manager	ESR Professional Registration Websites	Monthly	Reported to CMG nominated Professional Registration Lead	<ul style="list-style-type: none"> <li>Resourcing Manager</li> <li>Medical Staffing Manager</li> <li>CMG nominated Professional Registration Lead</li> </ul>	
Identification of professional registration lapses	Corporate Nursing Lead, Medical Staffing Manager, Resourcing Manager	ESR Professional Registration Websites	Monthly	Reported to CMG nominated Professional Registration Lead	<ul style="list-style-type: none"> <li>Medical Staffing Manager</li> <li>Resourcing Manager</li> <li>CMG nominated Professional Registration Lead</li> </ul>	

## **8 EQUALITY IMPACT ASSESSMENT**

- 8.1 The Trust recognises the diversity of the local community it serves. Our aim therefore is to provide a safe environment free from discrimination and treat all individuals fairly with dignity and appropriately according to their needs.
- 8.2 As part of its development, this policy and its impact on equality have been reviewed and no detriment was identified.

## **9 SUPPORTING REFERENCES, EVIDENCE BASE AND RELATED POLICIES**

- 9.1 This Policy interfaces with the following UHL Policies and Guidance Documents:

Revalidation for Nurses and Midwives Policy B26/2016  
Temporary Staffing Policy B58/2011  
Disciplinary Policy & Procedure A6/2004  
Recruitment and Selection Policy and Procedure B43/2009  
Non-Medical Prescribing Policy B18/2004  
Medical Appraisal and Revalidation Policy B17/2014  
Placements – Unpaid B8/2019  
NHS Employment Check Standards  
<https://www.nhsemployers.org/your-workforce/recruit/employment-checks/professional-registration-and-qualification-checks>

## **10 PROCESS FOR VERSION CONTROL, DOCUMENT ARCHIVING AND REVIEW**

- 10.1 Once this policy has been approved by UHL Policy and Guidelines Committee, Trust Administration will allocate the appropriate Trust Reference number for version control purposes.
- 10.2 The updated version of the policy will then be uploaded and available through INSite Documents and the Trust's externally-accessible Freedom of Information publication scheme. It will be archived through the Trust's SharePoint system
- 10.3 This policy will be reviewed every three years and it is the responsibility of the policy People Services Lead to commence this process in a timely manner to ensure a revised version is approved by the review date.
- 10.4 All previous versions of this policy are archived on SharePoint.

## Appendix 1 – Flow Chart

### Procedure for Administration / Monitoring of Professional Registration Checks Flow Chart

#### (Not applicable to Bank / Agency / Locum staff)

Professional Registration body sends reminder to employee/worker when their registration is due for renewal. It is the employee/worker's responsibility to maintain their registration to practice including during periods of annual leave, maternity and long term absence and to notify regarding changes of address

Workforce Information department to provide the Non-medical Recruitment Manager (for HCPC, GPhC, GOC, and Finance professional bodies), Medical Staffing Manager (for GMC and GDC) and Corporate Nursing (for NMC) with monthly Excel reports from ESR of those whose Professional Registration/Licence is due to expire.

HR Transactional team/Medical Staffing save the excel spreadsheet to the Recruitment shared drive and commences professional registration checks.

#### **Delayed or Lapsed Registration**

##### **Nursing and Other Professional Groups including GDC**

If the registration has not been renewed when checking the Professional Body website, and is due to lapse, Recruitment Services (or Medical Staffing for GDC) will e-mail the CMG nominated lead to alert them to this no later than seven days prior to the expiry (including weekends).

##### **GMC**

If the registration/licence has not been renewed but is still within the 56 day 'grace' period and is due to lapse Medical Staffing will arrange for an email (Appendix 6) to be sent to the CMG Medical Lead for processing. Medical Staffing will attempt telephone contact with the doctor to alert them to this and regular checks will be made and appropriate reminders issued.

Following a lapse, once the employee/worker has re-registered, the Head of Nursing/Manager/Service Manager/Consultant must inform the Recruitment Services Team, who will complete the necessary paperwork.

## Appendix 2 – Process for checking payment of NMC retention fee and NMC Registration

### UHL PROCESS FOR CHECKING PAYMENT OF NMC RETENTION FEE and NMC Registration

60 Days prior to NMC renewal	<ul style="list-style-type: none"> <li>NMC informs registrant via letter / email that annual retention fee is due</li> <li>NMC take payment via Direct Debit anytime from 1st of the month of registration or on line payment to the NMC</li> <li><u>No extensions granted for payment of the retention fee</u></li> </ul>	<u>Notes / exceptions:</u> <ul style="list-style-type: none"> <li>To receive pay as a nurse or midwife whilst on maternity, sick or annual leave registration must be maintained</li> </ul>
10 Days prior to renewal (on or about 20 <sup>th</sup> working day)	<ul style="list-style-type: none"> <li>ESR sends list of registrants for renewal to Deputy Chief Nurse (DCN) and/or nominated Deputy who sends to each CMG Head of Nursing (HoN) / Corporate Directorate</li> <li>Line Manager to confirm payment plans for renewal with registrant and Registrant given NMC Lapse letter No. 1 advising consequences of late payments</li> <li>Staff who are receiving occupational, sick or maternity pay must be contacted by phone &amp; lapse letter posted or emailed</li> <li>CMG to undertake PIN checks via NMC website</li> </ul>	<u>Notes / exceptions:</u> <ul style="list-style-type: none"> <li>Discussions to be documented</li> <li>DCN to undertake process for non-CMG registrants</li> <li>Fees can be paid on the last day of month but there is a risk that payment might be late</li> </ul>
3 Working Days to renewal	<ul style="list-style-type: none"> <li>CMG HoN / DCN meets registrant to confirm payment will be made on time &amp; they are aware of risks of lapsing i.e. suspension without pay</li> <li>CMG to undertake daily NMC Employer Checks for registrants who have not yet paid retention fee</li> </ul>	<u>Notes / exceptions:</u> <ul style="list-style-type: none"> <li>DCN to undertake process for non-CMG registrants</li> </ul>
Less than 2 Working Days <u>Renewal Date falling at a weekend or BH</u>	<ul style="list-style-type: none"> <li>HoN / DCN meets registrant to confirm at what stage the renewal process is</li> <li>Check with the NMC if online payment will be processed if renewal date falls at a W/E or BH</li> <li>If payment cannot be done before the WE / BH follow suspension process below</li> </ul>	<u>Notes / exceptions:</u> <ul style="list-style-type: none"> <li>ACN to undertake process for non-CMG registrants if they are working weekend in the capacity of a registrant</li> </ul>
0 Days <u>LAPSE CONFIRMED</u>	<ul style="list-style-type: none"> <li>HoN &amp; HR meet with individual &amp; give Lapse Letter No.2 and suspend with no pay</li> <li>If individual believes the NMC have delayed process, HoN will need to see evidence of this. HoN must verify information with NMC tel. 0207 3339333</li> <li>Application to re-join NMC register to be made within 3 days. Individual to provide evidence of why this happened</li> </ul>	<u>Notes / exceptions:</u> <ul style="list-style-type: none"> <li>Need date of birth &amp; address for queries</li> <li>Arrange further meeting in 3 days &amp; staff cover for a maximum of 6 wks.</li> </ul>
Application to re-join register confirmed	<ul style="list-style-type: none"> <li>HoN / DCN formally investigate reason for lapse</li> <li>Investigation could lead to dismissal if application to re-join not made in 3 days or other issues come to light i.e. NMC investigations that will mean renewal is deferred until investigation is completed</li> <li>Check NMC website to confirm registration <a href="http://www.nmc.org.uk/registration">www.nmc.org.uk/registration</a></li> </ul>	<u>Notes / exceptions:</u> <ul style="list-style-type: none"> <li>Future lapses may lead to automatic disciplinary hearing and possible dismissal</li> </ul>

### Appendix 3 – Advance e-mail notice of possible expiry of PR

#### “PROFESSIONAL REGISTRATION CHECKS – NOTICE OF POSSIBLE EXPIRY”

Dear Colleague

Professional registration expiry dates for staff are held in the ESR system and every month the Trust runs reports to identify which staff have professional registrations due to expire at the end of the month. Recruitment Services check the latest status of individuals against their online professional registers.

This is to advise you that having checked the professional register it is possible that the registrations for the following staff could lapse at the end of this month or in the case of GDC registered staff, the actual date of expiry.

***INSERT LIST – Note – minimal personal data and not including registration number, date of birth, NI no. etc***

Please bring this information to the urgent attention of the staff concerned

Yours sincerely

## Appendix 4 – Final e-mail notice of probable expiry of PR Non-Medical Staff

### “PROFESSIONAL REGISTRATION CHECKS – NOTICE OF PROBABLE EXPIRY”

Dear Colleague

Further to my previous e-mail, this is to advise you that having checked against the on-line professional register today the register is still showing that the registrations for the staff listed below will lapse imminently.

***INSERT LIST – Note – minimal personal data and not including registration number, date of birth, NI no. etc***

Please bring this information to the urgent attention of the staff concerned and advise them that without a confirmed active registration they will not be able to continue to practise beyond the start of the new month, **i.e. from midnight on the first day of the new month.**

It is understood that there are sometimes delays in updating the various professional registers (e.g. when nurses and midwives are also confirming their “Intention to Practise”) which are outside the control of the Trust, but for insurance reasons the Trust can only act on the available information.

We will recheck the online register again on the first working weekday of the new month and e-mail an updated list of staff with registrations which have lapsed.

In the meantime the Trust can only assume that the registrations listed above will lapse, so please confirm with the staff concerned which of the following options they wish to apply until re-registration has been confirmed:

- to suspend on no pay (default option for NMC registrants)
- to continue to work as scheduled, but working and paid at the highest unqualified grade; or
- to not work and take annual leave (to be paid at the highest unqualified grade); or
- to take unpaid leave.

**(By exception managers wish to consider suspension without pay if this is a repeat occurrence).**

Yours sincerely

## Appendix 5A – E-mail confirmation of expiry of PR - non medical staff

### “PROFESSIONAL REGISTRATION CHECKS – NOTICE OF PROBABLE EXPIRY”

Dear Colleague

Further to my previous e-mail, this is to advise you that having checked against the on-line professional register today this shows that the registrations for the staff listed below have now lapsed.

***INSERT LIST – Note – minimal personal data and not including registration number, date of birth, NI no. etc***

Attached are copies of named-addressed letters to be given to the staff concerned.

Please note that ‘Option 1 or 2’ will automatically be applied as the ‘default’ position as appropriate. Please let me know within three days if options 3, 4 or 5 should be applied instead.

Lapsed registration occurs from the first day of lapse and does not take into consideration non-working days or periods of annual leave as it is a requirement that professional registration is continuous.

Yours sincerely



## Appendix 5B – Letter to staff concerning expiry of PR – non medical staff

Dear Colleague

### EXPIRY OF PROFESSIONAL REGISTRATION

The Trust's records show that your professional registration was due for renewal by the beginning of this month and the on-line professional register is now showing that your registration has in fact expired.

It is understood that there are sometimes delays in updating the various professional registers (e.g. when nurses and midwives are also confirming their 'Intention to Practice') which are outside the control of the Trust, but for insurance reasons the Trust can only act on the available information.

Since the Trust is unable to continue to allow you to practice (including off duty days) without registration, the following options are available: **REMOVE OPTIONS IF NOT APPLICABLE**

#### **Option 1 for NMC Registered Nursing and Midwifery Staff and registered Nursing Associates**

NMC registered staff that have been confirmed as having lapsed registration will be suspended without pay until such time as re-registration is obtained.

#### **Option 2 for Non-Medical Staff including Allied Health Professionals (AHPs) (Not applicable to medical staff or NMC registrants)**

With the agreement of the line manager you may be paid on the highest unqualified grade and advised that you must work as such from midnight on the date of lapse until such time as re-registration can be confirmed by the Professional Body. During this time, you will work in an unqualified capacity and will be paid at the appropriate grade.

#### **Option 3 for Medical and Non-Medical Staff (Not applicable to NMC registrants)**

You may be able to take annual leave until re-registration can be confirmed with the appropriate registering body. Payment during this time will be at the appropriate unqualified grade. Banding payments for Doctors will cease during the period of annual leave.

#### **Option 4 for Medical Staff & Non-Medical Staff (Not applicable to NMC registrants)**

You may be able to take unpaid leave until re-registration can be confirmed and there will be no reimbursement for the temporary loss of salary.

#### **Option 5 for individuals whose registration has lapsed on a previous occasion (all staff groups)**

The Trust will suspend without pay until such time as re-registration is obtained.

Please note that Option 1 or 2 will be applied automatically if agreed by your line manager as the 'default' position, unless you elect for options 3 or 4 (if applicable). If this is a repeat occurrence, your manager may determine that option 5 is appropriate.

You should understand that it is your professional and contractual responsibility to maintain your registration throughout your employment with the Trust. Failure to do so may result in formal disciplinary action being taken against you, unless there exceptional circumstances, including the 'issue' of maintaining and updating the on-line registers noted above. Failure to re-register within a period of three working days from receiving this formal notification of the lapse in registration may result in disciplinary action being taken in accordance with the Trust's Disciplinary Procedure unless there are exceptional circumstances. Such lapses will be considered as Gross Misconduct and could result in dismissal.

The Professional Registration Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Professional%20Registration%20Checks%20UHL%20Policy.pdf>

The Disciplinary Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Disciplinary%20UHL%20Policy.pdf>

Yours sincerely  
CMG Clinical Director / Supervising Consultant  
People Partner  
Junior Doctors Administrator  
Service Manager, CMG Head of Operations

## Appendix 5C – Letter to staff concerning expiry of PR – NMC Registrants

Dear (Insert Name),

### **Failure to renew NMC Registration**

Despite receiving a letter from the Head of Nursing/Chief Nurse/Deputy Chief Nurse (**delete as appropriate**) on the **INSERT DATE** advising you to complete your renewal process, it would appear you have failed to renew your registration. This is because you have not paid your annual retention fee and / or submitted your Notification of Practice / Intention to Practice documentation (**DELETE ONE IF REQUIRED**) to the NMC on time and as a result your registration has lapsed. However, if you believe that this is not the case and you have evidence confirming that you have renewed, please contact me immediately so that I can verify your registration.

Since November 30<sup>th</sup> 2015, there has no longer been a grace period in which practitioners can submit their NMC renewal documentation and / or pay their retention fee after their registration expiry date. Instead, any nurse or midwife who allows their registration to lapse will need to make a formal application for readmission to regain access to the register. This process can take from two to six weeks, depending on individual circumstances.

As registrants, it is our responsibility to ensure registration is renewed prior to its expiry date. Continuing to work as a nurse or midwife while not on the NMC register contravenes the Code, is illegal and is in breach of your employment contract with the University Hospitals of Leicester NHS Trust. Therefore, I must now inform you that as a consequence of your registration lapsing you now need to be suspended from your duties as a **INSERT JOB TITLE**. The suspension of your pay will be effective from midnight **STATE DATE**. Your return to work as a **INSERT JOB TITLE** and reinstatement of pay will only recommence when your application to re-join the NMC register has been successful and your registration can be confirmed with the NMC.

Unfortunately, the taking of paid annual leave is not an acceptable alternative to suspension as the contract of employment requires the practitioner to be registered. Neither is receiving occupational sick pay or occupational maternity pay compatible with the contract of employment for the same reasons.

I should also advise that within 3 working days of receiving this letter you must provide evidence to me that you have commenced the application process to re-join the NMC register. Failure to do this by the **INSERT DATE** so may result in a disciplinary investigation / hearing that could lead to dismissal.

The Professional Registration Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Professional%20Registration%20Checks%20UHL%20Policy.pdf>

The Disciplinary Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Disciplinary%20UHL%20Policy.pdf>

I would like to take this opportunity to remind you that the easiest way to maintain your registration is through an NMC Online account and a link to this can be found at [www.nmc.org.uk/registration/nmc-online](http://www.nmc.org.uk/registration/nmc-online)

### **Help and advice**

Should your registration lapse or you have difficulty in re-applying, you can contact RCN Direct for help and advice [www.rcn.org.uk/contactus](http://www.rcn.org.uk/contactus). The RCN's legal department will also be on hand for any instances of readmission being refused by the NMC.

A copy of this letter will be placed on your personal file.

**Appendix 6 – Medical Staff (To be sent no later than one month after the official GMC expiry date but still within the 56 day grace period.)**

Telephone: 0116 258 \*\*\*

Date

**Private & Confidential**

Name

Address

Dear Doctor \*\*\*

**GMC/GDC Registration**

According to our records and the GMC / GDC on-line register your current registration expired on \*\*\*\*\*.

Please note that it is your responsibility to ensure that you send payment for re-registration and any appropriate paperwork to the registering body immediately. If you have changed your address since you last registered/renewed, please ensure that you have also passed this information on to the registering body.

It is unacceptable for a lapse in registration to occur. You have a professional responsibility and it is a contractual term that you have registration throughout your employment as a Doctor. You are not permitted to undertake the duties of a medical practitioner without current GMC registration and a licence to practice. It is important that you act on this letter as a matter of urgency as failure to re-register could result in disciplinary action being taken in accordance with the Maintaining High Professional Standards /Trust's Disciplinary Procedure unless there are exceptional circumstances. Such lapses will be considered as Gross Misconduct and could result in dismissal.

The Professional Registration Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Professional%20Registration%20Checks%20UHL%20Policy.pdf>

The Disciplinary Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Disciplinary%20UHL%20Policy.pdf>

The Concerns, Conduct, Capability, Ill Health and Appeals Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Conduct%20Capability%20Ill%20Health%20and%20Appeals%20UHL%20Policy.pdf>

Please would you urgently make arrangements for your registration to be renewed and confirm to me when this has been done. If you have any queries relating to this matter please do not hesitate to contact me.

Yours sincerely

**Medical Staffing Manager**

**Cc:** CMG Clinical Director / Head of Service  
People Partner  
Junior Doctor's Administrator  
Service Manager  
CMG Head of Operations

**Appendix 7 template – (To be sent if registration has not been renewed within the 56 day grace period)**

Dear Doctor \*\*\*

**GMC/GDC Registration**

Our records show that your professional registration was due for renewal on **(insert date)** and the Trust has confirmed today that you have been removed from the GMC register.

It is unacceptable for a lapse in registration to occur. You have a professional responsibility and it is a contractual term that you have registration throughout your employment. You are not permitted to undertake the duties of a medical practitioner without current GMC registration and a licence to practice. You must therefore contact the GMC immediately to complete the re-registration documentation and arrange to pay the required fees.

The Trust is now required to take **one** of the following actions that is deemed to be most appropriate:-

**Option1**

You will need to take annual leave until re-registration can be confirmed with the Professional Body. Banding payments will cease during this time.

**Option 2**

You will need to take unpaid leave until re-registration can be confirmed and there will be no reimbursement for the temporary loss in salary.

I have discussed this with you, and in the circumstances feel that option \*\*\* is most appropriate. Any necessary actions will be applied accordingly from a payroll perspective.

It is important that you act on this letter as a matter of urgency as failure to re-register within 3 working days of receipt of this letter could result in disciplinary action being taken in accordance with the Maintaining High Professional Standards /Trust's Disciplinary Procedure unless there are exceptional circumstances. Such lapses will be considered as Gross Misconduct and could result in dismissal.

The Professional Registration Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Professional%20Registration%20Checks%20UHL%20Policy.pdf>

The Disciplinary Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Disciplinary%20UHL%20Policy.pdf>

The Concerns, Conduct, Capability, Ill Health and Appeals Policy can be found here: <http://insitetogether.xuhl-tr.nhs.uk/pag/pagdocuments/Conduct%20Capability%20Ill%20Health%20and%20Appeals%20UHL%20Policy.pdf>

If you have any queries relating to this matter please contact me.

Yours sincerely

**Cc:** CMG Clinical Director / Head of Service  
People Partner  
Junior Doctor's Administrator  
Service Manager  
CMG Head of Ops

## Appendix 8

**Table to show staff groups covered by the policy and the requirements in terms of professional registration**

Staff Group	Professional Regulatory Body: General Medical Council	Renewal Details Interfaces with ESR
Medical Staff	General Medical Council <a href="http://www.gmc-uk.org">www.gmc-uk.org</a> 0161 923 6602 <a href="mailto:registrationhelp@gmc-uk.org">registrationhelp@gmc-uk.org</a>	Yearly Renewal date varies by individual.

Staff Group	Professional Regulatory Body: General Dental Council	Renewal Details Interfaces with ESR
Medical Staff / Dual Speciality Restorative Dentistry	General Dental Council <a href="http://www.gdc-uk.org">www.gdc-uk.org</a> 0207 887 3800	Yearly Expires in the weeks leading up to 31st December
Dental Nurses / Dental Hygienists / Orthodontic Therapists Dental Technicians	General Dental Council <a href="http://www.gdc-uk.org">www.gdc-uk.org</a> 0207 887 3800	Yearly Expires in the weeks leading up to 31 <sup>st</sup> July

Staff Group	Professional Regulatory Body: Nursing & Midwifery Council	Renewal Details Interfaces with ESR
Registered Nurses and Midwives	Nursing & Midwifery Council <a href="http://www.nmc-uk.org">www.nmc-uk.org</a> 0207 333 9333	Yearly retention payment Renewal date varies by individual – Revalidate 3 yearly

Staff Group	Professional Regulatory Body: Health & Care Professions Council	Renewal Details Interfaces with ESR
Dietitians	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (even- numbered years) Expires 1 <sup>st</sup> July
Hearing Aid Dispensers	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (even- numbered years) Expires 1 <sup>st</sup> August
Occupational Therapists	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (odd- numbered years) Expires 1 <sup>st</sup> November
Operating Department	Health & Care Professions	Every 2 years (even-

Practitioners	Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	numbered years) Expires 1 <sup>st</sup> December
Physiotherapists	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (even-numbered years) Expires 1 <sup>st</sup> May
Radiographers	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (even-numbered years) Expires 1 <sup>st</sup> March
Scientists - Biomedical	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (odd numbered years) Expires 1 <sup>st</sup> December
Scientists – Clinical	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (odd numbered years) Expires 1 <sup>st</sup> October
Orthoptics	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hcpc-uk.org">registration@hcpc-uk.org</a>	Every 2 years (odd-numbered years) Expires 1 <sup>st</sup> September
Prosthetists	Health & Care Professions Council <a href="http://www.hcpc-uk.org">www.hcpc-uk.org</a> 0300 500 4472 <a href="mailto:registration@hpc-uk.org">registration@hpc-uk.org</a>	Every 2 years (odd-numbered years) Expires 1 <sup>st</sup> October

Staff Group	Professional Regulatory Body: General Optical Council	Renewal Details
Optometrists	General Optical Council <a href="http://www.optical.org">www.optical.org</a> 0207 580 3898	Yearly Expires 31 <sup>st</sup> March

Staff Group	Professional Regulatory Body: General Pharmaceutical Council	Renewal Details
Pharmacists	General Pharmaceutical Council <a href="http://www.pharmacyregulation.org">www.pharmacyregulation.org</a> 020 3365 3400	Yearly Individual dates
Pharmacy Technicians	General Pharmaceutical Council <a href="http://www.pharmacyregulation.org">www.pharmacyregulation.org</a>	Yearly Individual dates

Staff Group	Professional Regulatory Body: Hospital Play Specialist	Renewal Details
Hospital Play Specialists	<a href="https://hpset.org.uk/">https://hpset.org.uk/</a>	Voluntary at present. Yearly

Staff Group	Professional Regulatory Body: RCCP	Renewal Details
Physiologists / Audiologists	Registration Council for Clinical Physiologists <a href="https://www.rccp.co.uk/">https://www.rccp.co.uk/</a> 0845 2263064	Voluntary at present

Staff Group	Professional Regulatory Body	Renewal Details
Accountants	<p>CIPFA – Chartered Institute of Public Finance and Accountancy <a href="https://www.cipfa.org/">https://www.cipfa.org/</a></p> <p>ICAEW – Institute of Chartered Accountants in England &amp; Wales <a href="https://www.icaew.com/">https://www.icaew.com/</a></p> <p>ACCA – Association of Chartered Certified Accountants <a href="https://www.accaglobal.com/uk/en.html">https://www.accaglobal.com/uk/en.html</a></p> <p>CIMA – Chartered Institute of Management Accountants <a href="https://www.cimaglobal.com/">https://www.cimaglobal.com/</a></p>	Yearly