

Registration and Re-Registration of Health Professionals Policy

Policy information

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Summary of document:

The purpose of this policy is to make explicit the responsibilities of Health Board employees in relation to the regulatory re-registration process whilst employed within this Health Board.

Scope:

This policy applies to all staff who are required to register, and to maintain that registration, with a statutory regulatory body to enable them to practise in a registered professional role. The All Wales Contract of employment also states that staff required to be registered to carry out their duties must maintain their registration.

To be read in conjunction with:

[201 - Disciplinary Policy](#) – opens in a new tab

Patient information:

Include links to [Patient Information Library](#)

Owning group:

Workforce & OD Team

Executive Director job title:

Director of Workforce and Organisational Development

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1.0 – New Policy – 27.07.2012

2.0 – Amended in line with the revalidation proves – 29.07.2016

3.0 – Revised – 18.05.2020

4.0 – Amendment to section 7.4 midwives – 24.05.2018

5.0 – Full Review – 19.06.2023

6.0 – update to the annex 7 re-registration (terminology) 19.8.2025

Keywords

Re-Registration, Revalidation, Registration

Glossary of terms

GMC - General Medical Council

ESR - Electronic staff record

DGP - Dental care professional

GDC - General Dental Council

PIN - Personal identification number

HIW - Healthcare Inspectorate Wales

HPC / HCPC- Health and Care Professions Council

PSA – Professional Standards Authority

WCD – Written Control Documents

GPhC – General Pharmaceutical Council

BPS – The British Psychological Society

GOC – General Optical Council

SCW – Social Care Wales

NMC – Nursing Midwifery Council

Contents

Policy information.....	1
Approval information	1
Introduction	4
Policy statement.....	4
Scope.....	4
Aim.....	4
Objectives	4
Policy	4
Responsibilities	7
References.....	8
Appendix 1 – Regulatory Bodies & Professionals	9
Appendix 2 – Non-Statutory Registers	10
Appendix 3 – Professions with Protected Titles	11
Appendix 4 – Professions with specific renewal periods	12
Appendix 5 – Monitoring all registration numbers / Personal identification number (PINs) in ESR	13
Appendix 6 – Notifications.....	14
Appendix 7 – Lapsed Registrations	15

Introduction

The main purpose of the regulators is to protect the public. They do this by holding registers of individuals who meet their standards of education, training, professional skills, behaviour and health. Scrutiny and oversight of the nine regulators is provided by the Professional Standards Authority (PSA).

The act of registration confers on individual registrants the legal right to use their protected title. Registration is a contractual requirement for employment within the Health Board as one of the professions listed in [Appendix 1](#).

From the point of initial registration, each registrant is subject to the appropriate professional Codes of Conduct and standards as set by the regulator.

If a practitioners registration lapses, they are not in a position to continue to practice using the protected title.

Appointing officers are responsible for checking that a person's registration allows them to be employed in a particular role before they start work, and that they maintain appropriate registration to practise.

Policy statement

This policy sets out the requirements of the employer and the registrants in maintaining their professional registration.

Scope

This policy applies to all staff who are required to register, and to maintain that registration, with a statutory regulatory body to enable them to practise in a registered professional role.

The All Wales Contract of employment also states that staff required to be registered to carry out their duties must maintain their registration. This policy includes bank staff.

Aim

The aim of this document is to ensure all health care professionals are registered and maintain their professional registration.

The principles of this policy will apply to all staff groups and will be revised as necessary.

Objectives

The aim of this document will be achieved by the following objectives:

- Ensuring all practitioners are aware of their obligation to maintain their professional registration.

Policy

Allied Health Professionals

The Health and Care Professions Council currently regulates 15 professions detailed in [Appendix 1](#). Each registrant is required to renew their registration every two years with The Health and Care Professions Council (HCPC).

It should be noted that the HCPC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

Medical Staff

All doctors are required to register with the General Medical Council (GMC) by payment of fee and also an Annual Retention Fee to remain on the GMC's Register of Medical Practitioners.

All doctors must hold a licence to practise and in addition demonstrate that their registration is appropriate to the type of post or practice they will be undertaking.

It should be noted that the GMC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

There are four types of registration:

- Provisional Registration

Provisional registration with a licence allows newly qualified doctors to undertake clinical training needed for full registration. A doctor who is provisionally registered is entitled to work only in Foundation Year 1 (F1) posts in hospitals or institutions that are approved for the purpose of F1 service. The fee paid for provisional registration is for a two year period.

- Full Registration

Full registration is required with a licence to practise for unsupervised medical practice in the NHS or private practice in the UK. Doctors who have undertaken a satisfactory period of experience under provisional registration may apply for full registration. An Annual Retention Fee is paid.

- Specialist Registration

All doctors working towards a consultant post (other than a locum appointment) in a medical or surgical specialty in the NHS are legally required to be included on the Specialist Register. All doctors will need to hold full registration and to pay an Annual Retention Fee.

- GP Registration

All doctors working in General Practice are required to be on the GP Register. All General Medical Practitioners are required to hold full registration and to pay an Annual Retention Fee.

Dentists & Dental Care Professionals

A Dentist or Dental Care Professional (DCP) is required to be registered with the General Dental Council (GDC). Registration with the GDC is to be renewed on an annual basis. An Annual Retention Fee is required.

It should be noted that the DCP register interfaces directly with the Electronic Staff Register (ESR) for the NHS. For roles defined as Dental Care Professionals refer to [Appendix 3](#).

Opticians

Registration with the General Optical Council (GOC) is required and must be renewed annually with the re-registration submitted by the deadline of 15 March each year. An Annual Retention Fee is required.

Pharmacists and Pharmacy Technicians

Registration is required with the General Pharmaceutical Council (GPC) and must be renewed annually.

The Professional Registration is on a rolling basis dependent on the date of initial registration. Pharmacy Technicians are also now required to be registered.

It should be noted that the GPC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

Social Workers

Registration with the Care Council for Wales (CCW) is required and must be renewed on a 3 yearly basis, with an Annual Retention Fee being payable.

Registered Nurses, Midwives and Specialist Community Public Health Nurses

In order to maintain their status as a registered nurse or midwife every three years, all nurses, midwives and Specialist Community Public Health Nurses (SCPHN) are required to register with the Nursing and Midwifery Council (NMC). This requires payment of a renewal fee every year and revalidation every 3 years to maintain their professional status.

Requirements for revalidation are found : <https://www.nmc.org.uk/revalidation/requirements> (opens in a new tab)

It should be noted that the NMC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

Other Professionally registered staff

Registration with other professional bodies such as Accountancy bodies, Chartered institute of personnel and development, other non-statutory health bodies etc. are to be renewed on an annual basis. An Annual Retention Fee is required. Refer to [appendix 2](#) for a list of non-statutory regulatory bodies.

All Agency Staff

When a request is placed for agency staff, the relevant agency will be asked to verify the regulatory body registration of the individual who will be undertaking the duties.

All Staff Groups Working under contract with the Health Board

Any registered staff contracted to provide a service on behalf of the Health Board, must be registered. Third party contracts (e.g. GP Co-ops).

In addition, as part of the contract the Health Board holds with an Independent Contractor, the contractor will be required to demonstrate that they have a robust system in place in order to verify the regulatory body registration of each individual they employ providing a service on behalf of the Health Board. The Contractor will be expected to verify the validity of the registration of all professionals they employ (both permanently and as locums etc) both at the time of initial employment and at the time when periodic re-registration is due.

Working Placements and Trainees

Any qualified professional staff attending the Health Board to participate in specific work placements or participate in training will be required to be registered with the appropriate regulatory body.

The host employer of the professional is required to verify that the individual is registered with the appropriate regulatory body prior to commencement of their work placement or training.

Where there is a need to train and declare a fitness to return to the register following a period of un-registration e.g. following a career break; the employer may need to provide a period of supervised activity to facilitate the return to the register.

The manager of the relevant department will be responsible for ensuring that any qualified professional has the appropriate valid registration.

Honorary Contract Holders (All Staff Groups)

Any professional staff holding an Honorary Contract with the Health Board will be required to be registered with the appropriate regulatory body.

The host employer of the professional staff member will be required to verify the regulatory registration of the individual prior to commencement of their duties. In addition, the host employer will be asked to provide the Health Board with the registration details of all professional staff, to be offered an honorary contract.

The manager of the relevant department will be responsible for ensuring that any qualified professional has the appropriate valid registration.

Responsibilities

Chief Executive

As Accountable Officer, the Chief Executive has overall responsibility for ensuring the health board has appropriate written control documents (WCDs) in place. These WCDs must comply with legislation, meet mandatory requirements, and provide services that are safe, evidenced-based and sustainable.

Nominated Director – Director of Workforce & Organisational Development, Director of Nursing, Quality and Patient experience, Director of Therapies and Health Science, Director of Primary, Community and Long-term Care and the Medical Director/Deputy CEO.

To ensure that the appropriate process and resources for reminding staff and managers of their duty to maintain their professional registration are in place.

Senior Management

To ensure that the appropriate process and resources for reminding staff and managers of their duty to maintain their professional registration are in place.

Department, service, or ward management

Workforce & OD – Monitoring of valid pins within ESR is undertaken by the Workforce Intelligence /ESR team. Refer to [Appendix 5](#) for details of the monitoring process.

All Managers - Regularly check ESR notifications to see if staff are due to reregister or revalidate.

If staff are off sick or on maternity leave on discussing the return date to work, ensure their registration/ revalidation date is current and has not expired during their time off.

Ensure all staff on ESR/roster have up to date registrations.

If staff have lapsed their registration or failed to revalidate, manage this with advice from Workforce and Organisational development, the responsible office or the medical director's department.

The manager of the relevant department will be responsible for ensuring that any qualified professional has the appropriate valid registration.

All Staff

If a registered staff member is at risk of lapsing from the professional register, they should seek advice /support from their manager, the responsible officer, the medical director and Workforce Advisor at the earliest opportunity prior to their registration lapsing.

Should an employee request an extension, they should inform their manager or medical revalidation team as soon as possible.

Individual registrants are responsible for ensuring their own continued competence and professional development in order to fulfil their statutory obligations and meet the requirements of post registration education and practice. It is the responsibility of each registrant to ensure that their registration remains current at all times.

If a registrant discovers that they have allowed their registration to lapse, they must **immediately** advise their manager of the position and contact the appropriate regulatory body. It is essential that all registrants are aware of the consequences of allowing their registration to lapse. Refer to [Appendix 7](#).

Registrants must inform BOTH the Health Board AND their Regulatory Body of any change of details to ensure the databases held by both organisations are both current and consistent.

The registrant must at the earliest opportunity inform their manager, or for medical staff the medical director of any "pending" situations/investigations/reports/criminal investigations/ convictions and cautions: This is a contractual requirement of employees of the Health Board. In addition, the registrant must inform their regulatory body of any issues that could impact on their registration status. Such notification does not in itself jeopardise the registrant's right to practise as a Registered Health Professional. Failure to do so however, could result in disciplinary action in line with the Health Board's disciplinary policy/investigation by the regulatory body, if it was considered that there was a deliberate attempt to conceal the facts or mislead the Health Board or regulatory body.

References

HPCP: [The Health and Care Professions Council \(HCPC\) | \(hcpc-uk.org\)](http://hcpc-uk.org)

NMC: [The Nursing & Midwifery Council - The Nursing and Midwifery Council \(nmc.org.uk\)](http://nmc.org.uk)

GMC [Home - GMC \(gmc-uk.org\)](http://gmc-uk.org)

GPhC: [Registers | General Pharmaceutical Council \(pharmacyregulation.org\)](http://pharmacyregulation.org)

GDC: [General Dental Council \(gdc-uk.org\)](http://gdc-uk.org)

SCW: [Social Care Wales | Home - Social Care Wales](#)

GOC: [Home | GeneralOpticalCouncil](#)

Appendix 1 – Regulatory Bodies & Professionals

Regulatory Body	Profession
General Medical Council	Doctors
Nursing & Midwifery Council	Nurses
	Midwives
	Specialist Community Public health Nurses
General Dental Council	Dentists
	Dental Care Professionals
General Pharmaceutical Council	Pharmacists
	Pharmacy Technicians
General Optical Council	Opticians
	Optometrists
Care Council Wales	Social Workers in Wales
Health and Care Professional Council	Radiographers
	Physiotherapists
	Dieticians
	Occupational Therapists
	Podiatrists
	Clinical Scientists
	Speech & Language Therapists
	Biomedical Scientists
	Art, Music & Drama Therapists
	Orthoptists
	Operating Department Practitioners
	Prosthetists & Orthotists
	Practitioner Psychologists
	Hearing aid dispensers
Paramedics	

Appendix 2 – Non-Statutory Registers

<u>Regulatory Body</u>	<u>Profession</u>
The Academy of Healthcare Science	
British Association of Play Therapists	Play Therapy
Association of Chartered Certified Accountants (ACCA)	Accountants
Chartered Institute of Management Accountants (CIMA)	
Chartered Institute of Public Finance and Accountancy (CIPFA)	
Institute of Chartered Accountants in England and Wales (ICAEW)	
The Chartered Institute of Personnel and Development (CIPD)	HR & People Development
United Kingdom Council for Psychotherapy UKCP	Psychotherapists
British Association of Cognitive and Behavioural Psychotherapists (BACP)	Cognitive Behavioural Therapists (CBT therapists)
British Association of Counselling and Psychotherapy (BACP)	Counsellors

Appendix 3 – Professions with Protected Titles

<u>Profession</u>	<u>Roles</u>
Dental Care Professionals	Clinical Dental Technicians
	Dental Nurses
	Dental Hygienists
	Dental Technicians
	Dental Therapists
	Orthodontic Therapists
Radiographers	Radiographer
	Diagnostic radiographer
	Therapeutic radiographer
Physiotherapists	Physiotherapist
	Physical therapist
Podiatrists	Chiropodist
	Podiatrist
Speech & Language Therapists	Speech and language therapist
	Speech therapist
Art, Music & Drama Therapists	Art psychotherapist
	Art therapist
	Dramatherapist
	Music therapist
Practitioner Psychologists	Practitioner psychologist
	Registered psychologist
	Clinical psychologist
	Counselling psychologist
	Educational psychologist
	Forensic psychologist
	Health psychologist
	Occupational psychologist
	Sport and exercise psychologist

Appendix 4 – Professions with specific renewal periods

<u>Profession</u>	<u>Renewal Period</u>
Radiographers	1 March to 28 February
Physiotherapists	1 May to 30 April
Dieticians	1 July to 30 June
Occupational Therapists	1 November to 31 October
Podiatrists	1 August to 31 July
Clinical Scientists	1 October to 30 September
Speech & Language Therapists	1 October to 30 September
Biomedical Scientists	1 December to 30 November
Art, Music & Drama Therapists	1 June to 31 May
Orthoptists	1 September to 31 August
Operating Department Practitioners	1 October to 30 November
Prosthetists & Orthotists	1 October to 30 September
Practitioner Psychologists	1 November to 31 October
Hearing aid dispensers	1 August to 31 July
Paramedics	1 September to 31 August
Dentist	1 January to 31 December
Dental Care Professionals	1 August to 31 July

Please note other renewal periods will be on a rolling basis dependant on initial registration date.

Appendix 5 – Monitoring all registration numbers / Personal identification number (PINs) in ESR

Workforce Intelligence/ ESR will run the NHS Professional Registrations report on a monthly basis



Identify any lapsed/expired registrations and email details to appropriate parties e.g central corporate function or heads of service



Where there is no interface for a professional body into ESR; the ESR team will help to guide the employee to enter their own registration through Employee Self Service where there has been a previous entry. For new entries, this needs to be entered centrally through ESRs core system.

Appendix 6 – Notifications

ESR System notifications:

Notifications will be sent to all employees with professional registrations noted in ESR and their supervisors (as per ESR hierarchy).

Registration Expiry Notifications (Renewal Notifications) are sent 25 days prior to the expiry date

Revalidation notifications will be sent at the following intervals

- 365 days prior to the Revalidation Date (1 Year)
- 183 days prior to the Revalidation Date (6 Months)
- 122 days prior to the Revalidation Date (4 Months)
- Where the Revalidation Date has been added or updated and the new date is less than (current system date + 122 days)

Allocate Rostering System notifications:

No Notification sent from the system to users; however, roster managers can identify employees about to expire, or if they have expired under expiring items on the homepage of the roster.



Appendix 7 – Lapsed/Suspended Registrations

In cases of lapsed/suspended registration for ALL STAFF GROUPS the individual **will not** be permitted to continue to practise in a role for which registration is a requirement until their registration is renewed and has been confirmed via an electronic check. During this interim period, the following options are available to the manager until such time as the individual's registration is renewed. **The manager can also seek advice from the operational workforce team and the professional leads at any point:**

- Move the staff member from the date of the lapsed registration to alternative duties which do not require the individual to be registered.
- An emergency application for taking accrued leave (paid at pay band at which it was accrued) and/or unpaid leave may be made by the staff member.
- If any activity has been carried out by a member of staff who has temporarily lapsed their registration and for which registration is a requirement, the line manager will undertake a risk assessment of the decisions made for that period and report the findings to their senior manager.
- If the regulatory body makes it known that the time taken to reinstate the registrant is of a timescale which will cause significant service disruption then in this instance advice should be sought from the local Workforce Department.

The manager must notify the relevant Workforce Manager and Professional Head/Lead, of the lapsed registration at the time it is identified.

Depending on the initial assessment into the circumstances of the lapsed registration, a formal investigation in accordance with the All Wales Disciplinary Policy (HDUHB Policy 201) may be required. This is particularly so when cases of recurrent lapses in registration occur. The investigation of each incident of lapsed registration should address all issues outlined in [Appendix 4](#) and this together with the subsequent action, should be documented on the Datix Form relating to the event.

Individual health care professionals may be liable for prosecution for claiming to be registered when they are not as this could be considered to be a criminal offence and as such may be reported to the Police and / or Counter Fraud.