

## **Lead Employer Trust**

## **Professional Registration**

## POLICY INFORMATION SHEET

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## Summary of Changes

<b>Date of Change</b>	<b>Changes made</b>	<b>Location of changes</b>	<b>Changes approved</b>	<b>Version Control</b>
30 <sup>th</sup> September 2014	4.2.4 to include example	Pages: 6	30 <sup>th</sup> September 2014	Now version 2
30 <sup>th</sup> September 2014	Inclusion or DRN to the wording	Pages: 6, 8	30 <sup>th</sup> September 2014	Now version 2
February 2015	Update to incorporate GP Practices	Pages: 5 and 6	May 2015	Version 3
April 2016	Document update	All pages	31 <sup>st</sup> May 2016	Version 4
July 2017	Section 6 updated to reflect changes to notifications on ESR	Page 7	25 <sup>th</sup> July 2017	Version 5
May 2019	Review – No Change			Version 6
November 2019	8.0 Monitoring and Review	Page 7		Version 7
October 2020	Document Review	All Pages		Version 7
December 2021	Document Review	All Pages		Version 8
April 2022	Annual Review			Version 9
May 2023	Annual Review and Equality Impact Assessment	All Pages	30 <sup>th</sup> May 2023	Version 9

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## **1. POLICY STATEMENT**

This policy covers guidance to Managers, Host Training Organisations, Human Resources and appointed ESR users on the process for checking and recording professional registrations at the recruitment stage and for ensuring that all staff employed by the Lead Employer Trust (LET) maintains their registration during their employment. It further provides action that will be taken if it is discovered that a practitioner's registration has lapsed.

## **2. INTRODUCTION**

This policy has been introduced in order to ensure that the Lead Employer Trust has adequate procedures to check the professional qualifications and registration status of staff employed, that are required to hold professional qualification and maintain registration with a professional regulatory body.

This policy covers guidance to managers, host training organisations, human resources and ESR users on the process for checking and recording professional registrations at the recruitment stage and for ensuring staff employed maintain their registration during employment. It further provides information on the action that will be taken if it is discovered that a practitioner's registration has lapsed.

Since the 16 November 2009, all doctors who wish to practise medicine in the UK, by law, need to be registered with a licence to practise, when a doctor's registration lapses, their licence to practise will also lapse.

## **3. SCOPE**

This policy relates to all employees who require to be registered with any of the following regulatory bodies to practise:

- The General Medical Council (GMC)
- The General Dental Council (GDC)

## **4. ROLES AND RESPONSIBILITIES**

### **4.1 The Lead Employer Trust's (LET's) Responsibility**

It is the LET's responsibility to check the following areas:

- Verify the registration details of all grades of prospective employees, with the appropriate regulatory body.
- Whether the registration is subject to any current restrictions that might affect the duties proposed
- If the applicant has any investigations against them about their fitness to practise that the regulatory body has a duty to disclose
- To ensure all grades of employees, maintain the relevant registration to practise as appropriate throughout their employment with the LET.

### **4.2 The Employee's Responsibility**

4.2.1 It is the employee's personal responsibility to ensure they are registered with the appropriate regulatory body and that this registration is kept up to date at all times.

4.2.2 It is both a professional and contractual requirement that employees, who are required by statute to hold state registration, are able to provide evidence of registration to the LET on request. Failure to maintain registration will result in action being taken by the LET, as per Section 7, which could lead to termination of employment.

- 4.2.3 Employees are required to inform the Human Resources Department about any issues relating to their registration, which may affect their employment. For example, current employees are required to inform the LET immediately if they are subject to any criminal or regulatory proceedings e.g. found guilty or charged with a criminal offence in line with the GMC's Good Medical Practice (2013) [http://www.gmc-uk.org/guidance/ethical\\_guidance/21184.asp](http://www.gmc-uk.org/guidance/ethical_guidance/21184.asp)
- 4.2.4 It is the employee's responsibility to ensure the periodic fee requirements of their Professional body are maintained.
- 4.2.6 It is the employee's responsibility to comply with the regulatory body Code of Professional Conduct and/or standards.
- 4.2.7 It is the employee's responsibility to keep the relevant Regulatory Body informed of changes of address, name, status, etc., so that their internal records are accurate and up to date and that renewal advice and information from the regulatory body is received.
- 4.2.8 It is the employee's responsibility to inform the LET of any changes to GMC/GDC registration and licence to practise as soon as practicably possible. This includes any conditions imposed on practise or any investigations whether personal or professional.

## **5. NEW EMPLOYEES**

- 5.1 The LET will be responsible for ensuring that all new employees appointed who require registration to practise by a regulatory body (as listed in 3.0) have appropriate and current registration prior to the commencement of employment with the LET.

### **5.2 Verifying Registration prior to Appointment**

Following interview and offer of appointment subject to verification of registration, the appointing Human Resources Officer will ensure that all professional registration checks are undertaken with the relevant regulatory body for all groups, via the website, and hard copy of registration documentation. Any areas of concern must be highlighted immediately to the HR Manager for further discussion and appropriate action determined.

### **5.3 Alert Notices**

An alert notice is a way of notifying NHS bodies, about registered health professionals whose performance or conduct could pose a significant risk of harm to patients, staff or the public. The LET will check the alert notice database prior to recruiting an individual.

If an individual is subject to an alert notice then the LET will confirm whether they are suitable to be employed into the position being offered.

### **5.4 Recording Professional Registration Details**

On appointment, details of the new employee's professional registration number and expiry date will be recorded onto the Staff Appointment form, a copy of which will be retained on the personal file along with a copy of the registration documentation (GMC/GDC Registration).

During employment evidence of updated registration for all staff will be recorded on ESR.

## **6.0 PROCEDURE FOR VERIFYING PROFESSIONAL REGISTRATION DURING EMPLOYMENT**

- 6.1 It is the responsibility of the LET Human Resources Department, to ensure that all employees maintain registration with their regulatory body.
- 6.2 The GMC has an electronic interface to ESR, updating GMC expiry dates as appropriate, on a daily basis. The monitoring of GDC Registration is done manually by checking the GDC website and then the record is updated on ESR.
- 6.3 ESR generates notifications one month before renewal of professional registration is due. All employees of the LET will receive a reminder from ESR system to their email account.

## **7.0 FAILURE TO UPDATE REGISTRATION**

- 7.1 If an employee does not update their professional registration, the LET cannot allow the employee to continue working as a registered professional.
- 7.2 Where it is discovered that registration has not been updated prior to the actual expiry date, the HR Officer will advise the employee of the consequences of failure to update their registration, which may result in some, or all or the following:
- Unpaid leave;
  - Working in an unqualified capacity with associated pay;
  - Disciplinary action, dependent upon the circumstances and in line with the Disciplinary Policy.
- 7.3 Where an employee fails to update registration by the date required, the HR Officer will discuss it with their line manager and appropriate action will be taken. Where necessary, the regulatory body will be informed of the lapse in registration and the action to be taken against the individual. Consideration will be taken of all circumstances relating to the failure to re-register, in conjunction with any necessary advice and information taken from the appropriate regulating body, before action is taken.
- 8.4 Payroll must be notified immediately by the HR Officer of any resulting amendments made to the employee's salary, as well as any subsequent updating of registration.

## **8.0 MONITORING AND REVIEW**

The Head of Human Resources of the LET is responsible for monitoring the application of this policy and to ensure that it is reviewed no later than three years from the date of issue. The Policy can be amended at any time in light of legislative changes.

**Preliminary Assessment Form**

v1/2009

The preliminary impact assessment is a quick and easy screening process.

It should:

- Identify those policies, procedures, services, functions and strategies which require a full EIA by looking at:
  - negative, positive or no impact on any of the equality groups
  - opportunity to promote equality for the equality groups
  - data / feedback
- prioritise if and when a full EIA should be completed
- justify reasons for why a full EIA is not going to be completed

**Division/Department**

LET HR Department

**Title of policy, procedure, function or service**

Professional Registration

**Type of policy, procedure, function or service**

- Existing
- New/proposed
- Changed



**Q1 - What is the aim of your policy, procedure, project or service?**

To ensure all LET employees maintain their professional registration during their employment.

**Q2 - Who is the policy, procedure, project or service going to benefit?**

LET Employees

**Q3 - Thinking about each group below, does, or could the policy, procedure, project or service have a negative impact on members of the equality groups below?**

Group	Yes	No	Unclear
Age		N	
Disability		N	
Race		N	
Gender		N	



Transgender		N	
Sexual Orientation		N	
Religion or belief		N	
Marriage & Civil Partnership		N	
Pregnancy & Maternity		N	
Relationships between groups		N	
Other socially excluded groups		N	

If the answer is “Yes” or “Unclear” complete a full EIA

**Q4 – Does, or could, the policy, procedure, project or service help to promote equality for members of the equality groups?**

Group	Yes	No	Unclear
Age	Y		
Disability	Y		
Race	Y		
Gender	Y		
Transgender	Y		
Sexual Orientation	Y		
Religion or belief	Y		
Marriage & Civil Partnership	Y		
Pregnancy & Maternity	Y		
Relationships between groups	Y		
Other socially excluded groups	Y		

**Q5 – Do you have any feedback data from equality groups that indicate how this policy, procedure, project or service may impact upon these groups?**

Group	Yes No Impact	Yes Impact	No	Unclear
Age			N	
Disability			N	
Race			N	
Gender			N	
Transgender			N	
Sexual Orientation			N	
Religion or belief			N	
Marriage & Civil Partnership			N	
Pregnancy & Maternity			N	
Relationships between groups			N	
Other socially excluded groups			N	

If the answer is “Yes Impact”, “No”, “Unclear” or opinion is divided complete a full EIA

**Q6 – Using the assessments in questions 3, 4 and 5 should a full assessment be carried out on this policy, procedure, project or service?**

Yes		No	X
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If you have answered “Yes” now follow the EIA toolkit and complete a full EIA form

**Q7 – How have you come to this decision?**

No indication that equality groups have been adversely affected by this policy

**Q8 – What is your priority for doing the full EIA**

High	Medium	Low
		X

**Q9 – Who was involved in the EIA?**

HR Department, Lead Employer Trust

**This EIA has been approved by:**

General Manager, Lead Employer Trust

**Date:** 18.5.2023

**Contact num** 0191 275 4769

**Please ensure that a copy of this assessment is attached to the policy document to which it relates.**

