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1.0 Introduction

The validation and monitoring of registration status for all professionals is essential to ensure that 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.

Health Professions who register with the Health Professions Council (HPC) must register in order to use the protected title(s) of their profession and demonstrate fitness to practice (knowledge, skills, character and health to carry out their roles safely and effectively). Registration with HPC demonstrates that registrants meet HPC standards for their professions as set out by law.

This procedure defines the processes for checking professional registrations of AHPs* pre-employment, at time of renewal and the actions if registration has lapsed.

2.0 Aim

The aims of the procedure are to ensure that:

- AHP registrants, Professional AHP managers, Operational Managers and the Recruitment Officers within the Directorate of Human Resources are clear as to their responsibilities regarding the validation and monitoring of registration;
- Clear arrangements are in place to validate the registration status of AHPs at the point of employment;
- Processes are in place to monitor and validate the renewal registration of AHPs and to provide assurances that these processes are working effectively.
- Processes are in place to manage staff members whose registration has lapsed.

3.0 Scope

This procedure applies to all AHP registrants, including those in generic or extended roles, whether temporary, permanent or bank / locum staff, employed by the Southern HSC Trust to work in a HPC regulated post. It also applies to all staff who are on maternity leave, on a career break or on other extended leave.

* AHPs covered in this procedural guidance are Occupational Therapy, Physiotherapy, Speech & Language Therapy, Podiatry, Orthoptics, Nutrition & Dietetics and Radiography.
4.0 Frequency of registration validation

AHP registration is a function of the Health Professions Council (HPC). To maintain registration with the HPC the registrants must:

- **Renew their professional registration once every 2 years.**

  Dateline for specific disciplines are as follows:

<table>
<thead>
<tr>
<th>Discipline</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Radiographers</td>
<td>28 February</td>
</tr>
<tr>
<td>Physiotherapists</td>
<td>30 April</td>
</tr>
<tr>
<td>Dietetics</td>
<td>30 June</td>
</tr>
<tr>
<td>Podiatrists</td>
<td>31 July</td>
</tr>
<tr>
<td>Orthoptists</td>
<td>31 August</td>
</tr>
<tr>
<td>Speech &amp; Language Therapists</td>
<td>30 September</td>
</tr>
<tr>
<td>Occupational Therapists</td>
<td>31 October</td>
</tr>
</tbody>
</table>

- **Pay a registration fee (either as a one off payment every two years or by four separate direct debit installments).**

- **Sign and forward their renewal declaration form to the HPC.**

Registration will only be renewed once the HPC receive and process the registrant’s payment and their signed renewal declaration form. Once registration has been successfully updated the registrant will receive a certificate and a HPC identification card. These documents will be valid for two years and indicate the registrants name, profession and registration number.

Where HPC have not received payment and a signed renewal declaration form by the relevant deadline date registrant will have their name removed from the live register and he/she will not be able to use the protected title(s) of their profession. A re-admission fee will be required to become registered again.
5.0 Validation of Professional Registration

5.1 Pre Employment

As part of the recruitment process the applicant is asked to record evidence of registration by entering their HPC registration PIN number and expiry date on their application form. If this is not present the applicant may not be short listed.

As part of the pre-employment checks, the Human Resource Recruitment Officer managing the appointment file will:

- Request prospective employees to provide original evidence of their registration (certificate and ID card) which they will photocopy and file in the personnel file;
- Check the HPC online register www.hpccheck.org to verify current registration and expiry date;
- Print the online register confirmation form and place in the personal file;
- Notify the recruiting manager immediately if registration is not confirmed.

5.2 On Appointment to Professional post

Having received verification from the Human Resource Recruitment Officer that the newly appointed employee has a valid registration the AHP Professional Manager will input the new employee’s registration details on to the database.

5.3 Post Employment Registration Checks

Registration renewal packs are issued by the HPC to registrants 3 months before the deadline for re-registration.

5.3.1 Registrant Responsibilities

Every member of staff who is a registrant of the HPC must comply with the following responsibilities:

- Ensure that the renewal process is completed before the expiry date for their discipline (HPC, How to fill in your registration renewal forms 2007);

- Maintain registration with the HPC as stipulated in their contract of employment and professional code of conduct. Staff members who are on maternity leave, on a career break or on other extended leave are also responsible for maintaining their professional registration throughout their absence period.

- If there are any changes in your personal or bank details immediately notify the HPC. This will ensure that the HPC are able to make contact
and are able to collect the direct debit payment on the stipulated collection
date thereby preventing any financial default;

- Immediately inform their Operational Manager and Professional Head of
  Service if they experience difficulties in renewing their registration or
  making financial payment to the HPC;

- Advise his/her Operational Manager and Professional Head of Service of
  changes to their registration status (additions, cautions, suspensions)
  imposed by the regulatory body.

### 5.3.2 Operational Line Manager Responsibilities

All Operational Managers who have staff who are registered with the HPC
must adhere to the following responsibilities:

- Ensure themselves that all HPC registered members of staff within their
  area of responsibility are appropriately qualified and registered to practice;

- Ensure that the Professional Head of Service is informed prior to the
  commencement date of all new AHP staff appointments / commencement
  dates so to ensure that the registrant details are inputted on to the
  registrant database. This notification will ensure that when registration
  checks are carried out on a twice yearly basis by the Professional Head of
  Service the professional registrant list is up to date and all staff members
  are accounted for.

- When the Professional Head of Service sends out a completed copy of
  *Appendix 2* informing operational managers that all staff working within
  their area of responsibility are registered it is imperative that this list of
  registrants is checked against current staffing levels. This will ensure that
  the information is correct and that there are no staff name omissions. If the
  information is not correct the Professional Head of Service must be
  immediately notified.

- In order to provide written assurances to the Professional Head of Service
  that the list of registrants has been checked the Operational Manager
  must complete, sign and return a copy of *Appendix 3*.

- If it becomes apparent that a staff member has allowed their registration to
  lapse then the operational manager must immediately advise their
  immediate line manager and the staff member’s relevant Professional
  Head of Service. The action that needs to be taken must be agreed with
  the Professional Head of Service / Assistant Director in conjunction with
  advice for the Human Resources Department.
• If it becomes apparent that a professional has allowed their registration to lapse then, in discussion with the Human Resources department will ensure that the staff member immediately takes annual leave or unpaid leave and will not be allowed to return to work until formal evidence that their registration has been renewed is provided and verified by the Professional Head of Service.

• Failure to renew professional registration within a reasonable time frame will result in formal disciplinary action being taken and this could result in the staff member’s dismissal.

• Notify the Salaries and Wages department and Human Resources department (using a Staff Amendment Form) where staff status has changed, for example, if the staff member is suspended without pay as a result of an invalid registration.

5.3.3 AHP Professional Head of Service Responsibilities

AHP Professional Head’s of Service must adhere to the following responsibilities:

• Ensure that all professional staff members comply with the HPC, the Trust’s Registration Policy (2009) and the Trust’s Procedure of the Validation & Monitoring of AHP registration (2009). Section 6 of this procedure outlines how this compliance is to be monitored;

• Ensure that the registrant list is kept up to date at all times and following notification by the operational manager the details of any new staff members are inputted on to the registrant database;

• Alert all professional staff within their AHP discipline to renew their registration three months prior to the expiry date. A standardised memo (Appendix 1) can be used to communicate to all AHP professional staff their need to ensure that their registration renewal is completed by the expiry date.

• Prior to each bi-annual register check, the Professional Head of Service should contact the Trust’s Workforce Information Team (028 37412613) within the Human Resources Department and request an up to date and Trustwide list of staff within each the relevant AHP discipline. This list will capture all AHP staff members who are currently employed within the Southern Trust.

• Following receipt of this information a cross reference of the staff names should be made against the staff names listed within Appendix 2.
In order to provide assurances to all Operational Managers who have an operational responsibility for registrant staff, the Professional Head of Service will send out a 'filtered' copy of Appendix 2. This will notify the Operational Manager that the relevant AHP staff members within their area of responsibility are registered to practice.

If the Operational Manager notifies the Professional Head of Service that the 'filtered' Appendix 2 is NOT accurate, immediate action must be taken to ensure that there is full compliance with the procedures. A copy of the Appendix 3 return from the Operational Manager must be kept for record keeping purposes.

If it becomes apparent that a staff member has allowed their registration to lapse then the Professional Head of Service must immediately advise the staff member’s Operational Manager and ensure that the incident is immediately and fully investigated. The action that needs to be taken must be agreed with the Operational Manager / Assistant Director in conjunction with advice from Human Resources;

Once all Operational Managers have confirmed to the Professional Head of Service that all relevant staff are accounted for and are registered to practice a full copy of Appendix 2 must be sent to the Assistant Director of AHP Governance, Workforce Development & Training so that an assurance can also be provided to the Trust’s Governance Committee;

6.0 Monitoring of Compliance with the Procedure

It is common practice for AHP Professional Head’s of Service to informally check the HPC register in order to get an overview of how many registrant staff within their areas of responsibility have not re-registered in the weeks leading up to the re-registration deadline date. This informal checking and alerting process reduces the risk of staff members not being re-registered by the deadline date and prevents the negative impact on service delivery if the staff member is suspended without pay as a result of an invalid registration.

However formal checking mechanisms are required in order to provide assurances to the Trust that all AHP registrant staff are registered as outlined within their contractual arrangements and in adherence to Trust’s Professional Registration policy. This check must also include any staff members who are on maternity leave, career break or on extended sick leave.

Since all re-registrations will be completed by the HPC on or before the deadline date for each AHP discipline a register check by each AHP Professional Head of Service will be feasible on the next working day following each AHP discipline’s deadline date. It is imperative that this register check is carried out within 5
working days of this deadline date, with the check date being recorded within the ‘Check Date 1’ column of the proforma that is outlined in Appendix 2.

6.1 Risk of De-registration secondary to the default of a direct debit payment during 2 year re-registration cycle

Registration payment to the HPC is normally given as a full payment prior to the deadline re-registration date for each AHP discipline or as 4 separate direct debit installments over the 2 year re-registration cycle. The date of these installments is different for each discipline and is outlined in Table 1 below. The HPC collect financial payment on the first working day of the stated month.

Table 1 outlining (a) Registration Renewal Dates for each AHP discipline and (b) the dates when direct debit payment of fees is due for each AHP Discipline

<table>
<thead>
<tr>
<th>AHP Discipline</th>
<th>Registration Renewal Date</th>
<th>Date of direct debit (1st working day of each month)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dietetics</td>
<td>30 June</td>
<td>May &amp; November</td>
</tr>
<tr>
<td>OT</td>
<td>31 October</td>
<td>March &amp; September</td>
</tr>
<tr>
<td>Orthoptics</td>
<td>31 August</td>
<td>January &amp; July</td>
</tr>
<tr>
<td>Physiotherapy</td>
<td>30 April</td>
<td>March &amp; September</td>
</tr>
<tr>
<td>Podiatry</td>
<td>31 July</td>
<td>June &amp; December</td>
</tr>
<tr>
<td>Radiography</td>
<td>28 February</td>
<td>January &amp; July</td>
</tr>
<tr>
<td>SLT</td>
<td>30 September</td>
<td>February &amp; August</td>
</tr>
</tbody>
</table>

If a direct debit payment is not made by a staff member on any of the four installment dates the HPC will write to the AHP staff member and request immediate payment within 21 days. If no response is made the HPC will write to the individual again and a payment deadline of an additional 14 days will be issued. Failure to pay this outstanding payment at the end of this 5 week lapse period will result in de-registration.

If this situation were to occur then the member of staff’s removal from the register could be difficult for the Trust to detect and this could expose the Trust to a potential risk, hence the need for monitoring systems to be in place.
6.2 Monitoring Systems

In order to ensure that robust and effective monitoring systems are in place throughout any of the AHP disciplines two year registration cycle the need for twice yearly checks on the HPC live register has been identified. These checks will carried out by the AHP Professional Head of Service and the check dates are set to coincide with the times when the risk of deregistration is more likely to occur - namely during re-registration and when financial payment to the HPC is required.

In order to make this checking process as efficient as possible the HPC have devised a ‘multiple registrant search’ engine and this allows managers to check up to 100 registration records at any one time. This multiple registrant search tool can be located at: www.hpc-uk.org and go to ‘about registration / the register / multiple registrant search.’ By inserting the registration numbers of staff members into this search box the HPC will provide a written confirmation response confirming if the staff members are registered or not.

In order to provide written evidence that these checks have been completed by the AHP Professional Head of Service a record of this checking process will be made on the proforma outlined within Appendix 2 of this procedure.

The audit check dates for each 2 year registration cycle are stipulated for each AHP discipline within Table 2. It is important to explain that the dates for checks 2, 3 & 4 are set at two months following the direct debit dates. This time lag is required to give sufficient time for the HPC to initiate their procedural arrangements for financial default and it would only be after the HPC six weeks pardon period that a staff member would be de-registered.

Following completion of the second and fourth check of the live HPC register a signed copy Appendix 2 must be sent to the Assistant Director of Governance, Workforce Planning & Training as evidence to the Trust's Governance Committee that all AHP registrant staff are 'live' on the HPC register;
Table 2 outlining the audit check dates for each AHP discipline within the 2 year registration cycle

<table>
<thead>
<tr>
<th>AHP Discipline</th>
<th>Registration Check Dates over each 2 year registration cycle</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The check date is to be carried out within the first five working days of the stipulated month</td>
</tr>
<tr>
<td></td>
<td>CHECK1</td>
</tr>
<tr>
<td>Dietetics</td>
<td>July</td>
</tr>
<tr>
<td>OT</td>
<td>November</td>
</tr>
<tr>
<td>Orthoptics</td>
<td>September</td>
</tr>
<tr>
<td>Physiotherapy</td>
<td>May</td>
</tr>
<tr>
<td>Podiatry</td>
<td>August</td>
</tr>
<tr>
<td>Radiography</td>
<td>March</td>
</tr>
<tr>
<td>SLT</td>
<td>October</td>
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</table>

As outlined in 5.2 of this procedure, where renewal of registration has not been confirmed within the required time scale there will be evidence of action being taken to prevent the member of staff from working in a regulated post as per policy.

The audit should also highlight any deficits or improvements that could be made to the procedure in order to ensure timely renewal of registrations.

6.3 Governance Committee responsibility

The Trust’s Governance Committee will provide a statement of assurance in relation to compliance with Trust policy on validation and monitoring of professional registration.
7.0 **Legislative Compliance, Relevant Policies, Procedures**

This procedure should be read in conjunction with following: -

- Southern HSC Trust Policy on Validation and Monitoring of professional registration (July 2008)
- HPC, *Returning to Practice*, HPC publication 2008
- HPC, *Continuing Professional Development and your registration*, HPC publication 2008
- HPC, *How to fill in your registration renewal forms*, 2007