



EMPLOYMENT OF STATUTORY REGISTERED PROFESSIONALS POLICY

Responsible Director	Director of Human Resources
Approved By	Area Partnership Forum
Equality Assessed	February 2011 We are working to ensure that no-one is treated in an unlawful and discriminatory manner in the workplace because of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity status, race, religion or belief, sex, sexual orientation and/or socio-economic status.
Date Approved	17 th November 2021
Date for Review	November 2023
Replaces	Version 1 – dated February 2011
Other Relevant Policies	Disciplinary Policy and Procedure

Version	2.1
Date revised	15 April 2026

1. Introduction

- 1.1 In order to protect the public, persons providing professional healthcare services within the NHS are required by statute to register, and maintain such registration/ revalidation, with the relevant regulatory body listed below:

The General Chiropractic Council (GCC)

Regulates: Chiropractors

The General Dental Council (GDC)

Regulates: Dentists, Dental Therapists, Dental Nurses, Dental Technicians, Clinical Dental Technicians and Orthodontic Therapists.

The General Medical Council (GMC)

Regulates: Doctors

The General Optical Council (GOC)

Regulates: Dispensing Opticians and Optometrists

The General Osteopathic Council (GOsC)

Regulates: Osteopaths

The Health and Care Professions Council (HCPC)

Regulates: Arts therapists, Biomedical Scientists, Chiropodists/ Podiatrists, Clinical Scientists, Dieticians, Occupational Therapists, Operating Department Practitioners, Orthoptists, Paramedics, Physiotherapists, Prosthetists and Orthotists, Radiographers, Speech and Language Therapists, Practitioner Psychologists

The Nursing and Midwifery Council (NMC)

Regulates: Nurses, Midwives and Specialist Community Public Health Nurses.

The Royal Pharmaceutical Society of Great Britain (RPSGB)

Regulates: Pharmacists, Pharmacy Technicians and Pharmacy Premises.

Protecting Vulnerable Groups (PVG)

In addition to statutory professional registration requirements, staff undertaking regulated work with children or protected adults must also be a member of the Protecting Vulnerable Groups (PVG) Scheme, in line with national safeguarding legislation. This ensures that individuals employed in such roles are subject to ongoing suitability checks to protect vulnerable service users.

2. Purpose

- 2.1 The purpose of this document is:

- (i) To protect the public who come into contact with the Board by ensuring that all staff in statutory registered professions employed by NHS Greater Glasgow and Clyde fulfil the appropriate registration/revalidation requirements to practice.
- (ii) To provide a framework applicable across NHS Greater Glasgow and Clyde which ensures that all staff in statutory registered professions are currently registered with the relevant regulator.

3. Statement of Intent

- 3.1 It is a condition of employment with the Board that a person must be registered with the relevant regulator in order to practice in any of the professions identified in paragraph 1.
- 3.2 Prior to an offer of employment, all applicants to such posts will have the details of their Registration Documents (which includes Statement of Entry to the Professional Register for those regulated by the NMC) and current registration verified.
- 3.3 A newly qualified person awaiting registration may be employed in the first instance in an appropriate non-registered post, and paid accordingly, until proof of registration is submitted and confirmed, at which time the employee will be confirmed in the registered post and paid at the appropriate rate.
- 3.4 An accurate record of the expiry dates of registration/revalidation will be maintained for all employees in registered posts. This will be captured within the Electronic Employee Support System (eESS).
- 3.5 It is the employee's responsibility to maintain registration/revalidation. Staff that allow their registration/revalidation to lapse will not be permitted to continue to practice within their Registered role. Any serious lapse in registration/revalidation may lead to formal investigation in line with the Conduct Policy and Procedure otherwise will be supported via Early Resolution process.
- 3.6 If the lapse in registration/revalidation is due to administration errors by the regulatory body and this is evidenced by the employee, reimbursement of substantive pay will be made following return to their registered role.

4 Responsibilities

- 4.1 Employees in Statutory Registered Employment are:
 - Accountable for ensuring that their registration/revalidation is current.
 - Accountable for ensuring that they fulfil the criteria for periodic registration/revalidation renewal with the regulator.
 - Responsible for ensuring that their Manager is shown evidence of renewed registration/revalidation once the confirmation document-e-mail is received and ensuring that this is updated on eESS.
 - Responsible for advising the relevant regulator of any change in personal details, e.g. address, payment card, bank details, e-mail or name.
 - Responsible for ensuring that their registration/revalidation is renewed whilst on leave or suspension (including annual, sick, maternity/ paternity/ adoption/ parental and career breaks).
- 4.2 Managers are responsible for:
 - Regular monitoring of eESS reports to ensure maintenance of an accurate record of the current registration/revalidation expiry dates for all of their statutory registered staff.
 - Approval of employee updates in relation to registration/revalidation dates within eESS, following confirmation of evidence from the employee.
 - Ensuring proactive engagement with employees regarding the status of registration/revalidation through regular discussions.

- Being accountable for any statutory registered member of staff in their Ward/Department whose registration/revalidation has not been renewed on, or before, the date due and for liaising with the HR Support & Advice Unit regarding employees who default, if required.
- Being accountable for advising their Line Manager on a monthly basis and in writing for ensuring their statutory registered staff hold current registration/revalidation.
- Being accountable for verifying the registration of newly statutory registered staff appointed to temporary posts.

4.3 Recruitment Staff are:

- Responsible for checking the status of all statutory registered applicants from the applicants form and inputting this on eESS as part of new start process.
- Responsible for verifying newly qualified staff awaiting entry to a statutory register prior to appointment.

5. Procedure – Verifying the Registration of New Applicants.

5.1. Recruitment Staff will note an applicant's registration details on the application form.

5.2 A newly qualified applicant awaiting registration will be assessed for interview pending registration.

5.3 A registered applicant will have their registration verified by Recruitment Staff prior to interview and a record will be retained with the applicant's interview papers.

5.4 At interview

- Candidates will produce their current registration documents.
- Employing Officer/Chair of the interview panel will note the applicant's PIN (if applicable), date of entry to the register and the expiry date of current registration on the interview papers.

5.5 On appointment to a post

- The Employee will submit their registration/revalidation documents to their Manager and copies will be taken and retained in the member of employee's personal file.
- Upon receipt of the details the Manager will verify the registration with the relevant Regulator's Confirmation Service.
- The registration/revalidation details will be entered into eESS.
- A transaction update will be carried out on eESS to advise of amended employment status and salary, effective from the date the employee commenced working in the registered post.

5.6 At interview, if successful, candidates will be advised that:-

- Appointment will be to an appropriate temporary non-registered post in the first instance pending confirmation of registration and their salary will be paid accordingly.
- Such staff will not be permitted to practice in a registered post until evidence of registration is submitted and confirmed, at which time they will be placed on the minimum of the appropriate non-registered band.

6. Procedure – Verifying Periodic Renewal of Registration/Revalidation.

6.1 It should be noted that some Regulators operate a fixed-date or bi-annual system of registration/revalidation renewal. In such circumstances the following procedure should be interpreted in accordance with the appropriate Regulator's registration renewal cycle.

6.2 The Manager will:

- Review employees' registration expiry record two months in advance.
- Advise in writing to each employee whose registration expires in the period under review that evidence of registration renewal must be submitted before the expiry date of the current registration.
- Include those employees whose registration expires while absent from duty, e.g. on leave or suspension (including annual, sick, maternity/paternity/adoption/parental and career breaks) by forwarding reminders to the employees home address.
- Update/ approve the record of registration expiry date on eESS. There is currently is no interface between eESS and NMC managers must manually update eESS.
- Report through their Directorate structures that renewals due have been verified.

6.3 Where an individual's registration has lapsed due to their own error:

- The Manager will meet and confirm with the employee that they cannot continue in their present post on expiry of their registration/revalidation until evidence of renewal is submitted.
- Identify suitable vacant non registered roles i.e. Band 2/3/4 role for the employee to undertake whilst awaiting registration/revalidation.
- Ideally this position will be outwith their own clinical area.
- Advise Payroll of any change in status and salary through eESS.
- Advise their Professional Lead i.e. Chief Nurse, Chief AHP/ Clinical Service Manager, Head of Department, etc. as appropriate, of the situation and action taken.
- Following confirmation and evidence of re-registration/revalidation then the post holder will be reinstated to their Registered role and salary. The employees' grade and salary should be updated on eESS.

6.4 Where an individual's registration has lapsed due to the error of the Registration Body:

- The Manager will meet and confirm with the employee that they cannot continue in their present post on expiry of their registration/revalidation until evidence of renewal is submitted.
- Identify suitable vacant non registered role for the employee to undertake whilst awaiting registration/revalidation.
- Ideally this position will be out with their own clinical area.
- Following confirmation and evidence of re-registration/revalidation then the post holder will be reinstated to their Registered role and salary.
- Following evidence and confirmation of the error being made by the Registered Body then the individuals pay will be backdated accordingly.

6.5 Where a Nurse Bank Staff registration has lapsed:

- No shifts will be available through the Bank.

- The Bank registrant may choose to utilise accrued annual leave while awaiting re-registration/ revalidation.
- Where a Bank Staff Worker does not wish to utilise accrued annual leave or does not have sufficient accrued annual leave while awaiting their re-registration/ revalidation, they will be offered the non-registered rate suitable within the department requiring bank cover.
- Following confirmation and evidence of re-registration/revalidation then the Bank Staff Worker will be reinstated to their Registered role and have access to Employee Online to allow access to shifts.

6.6 Early Resolution & Conduct Investigations

Where an employee's registration/ revalidation has lapsed while they are on a period of long term leave, such as suspension, sick leave or maternity leave, the manager will continue to communicate to the employee to advise of the expiry of their registration/ revalidation. The manager should advise the employee that they are required to ensure that their registration/ revalidation is renewed prior to returning to work. If the employee has failed to renew their registration at the time of returning to work, and this has been a first occurrence and minor lapse, this will be supported via Early Resolution as detailed in the Conduct Policy and Procedure. The employee will be placed within a non-registered post and receive the appropriate salary for this post until their registration/ revalidation has been renewed.

Where an employee is not on long term leave and their registration/ revalidation has expired, the manager should initially meet with the employee to establish the reasons that have led to this expiry. When the lapse in registration/ revalidation has been a first occurrence and minor lapse, this should be supported via Early Resolution as detailed in the Conduct Policy and Procedure.

A formal investigation in accordance with Workforce Investigation Policy is only applicable where there has been a serious lapse in registration/revalidation, for example recurring lapses of registration/revalidation, or continuing to work whilst registration has lapsed.

7. Monitoring and Review

- 7.1 The application of this Policy will be monitored jointly by the Director of Human Resources and Organisational Development and the Area Partnership Forum to ensure equitable treatment of all employees.
- 7.2 The Board is required by law to gather monitoring information relating to a broad range of characteristics with regard to equality and diversity (e.g. race/ethnicity, age) for many aspects of employee relations. Employees may be asked for information relating to the above in connection with the policy. Employees do not have to give the monitoring information if they do not wish to. Any equalities monitoring information will be held separately and not used to inform any proceedings that occur in relation to this policy.
- 7.3 The operation of this Policy will be regularly reviewed by the Area Partnership Forum to ensure its continued effective operation and formally reviewed no later than November 2023.

Version control

Version	Date	Change	Approved
1.0	15-Feb-2011	Policy published	Director of HR
2.0	17-Nov-2021	Policy revised	Area Partnership Forum
2.1	15-Apr-2026	Section 1.1: PVG added as a regulatory body	Area Partnership Forum