

Maintaining Professional Registrations

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What is a people policy

A people policy provides advice and guidance on what is expected from you, and how you can expect to be treated. It also sets out the support that is available to you and how you can access it.

What this policy covers

This policy outlines the requirements of employees who are required by law to hold and maintain a professional registration to be able to legally undertake their role.

Why we have this policy

The Trust must not allow any employee to practice in roles regulated by law without ensuring they are registered, and this policy sets out how the Trust will ensure all employees maintain the relevant professional registration and the procedures that must be followed.

How this policy reflects our culture and PRIDE values

We want Cambridgeshire and Peterborough NHS Foundation Trust to be a place where everyone feels safe and supported at work. Our people policies are written with reference to our Trust PRIDE Values.

In 2024 we were proud to introduce our Trust Behavioural Framework which supports us all, wherever we are in the organisation and whatever our role, to live our values.

Our [Behaviours Booklet](#) sets out in full the behaviours that staff have told us they don't want to see and those they expect to see from each other and have modelled for us to be the best Trust we can together.



How do we know this policy treats people fairly?

Whenever we write a policy, we do an 'equality impact assessment' (EIA) to ensure it treats everyone fairly, and it does not disadvantage or discriminate against anyone or any protected group.

We also review our policies regularly to see how we are doing. This includes listening to colleagues' views and reviewing information about how the policy works in practice.

Language used in this policy

Professional Registration

All professional practitioners who require a qualification and continued registration by law to practice in their role, e.g., Nurses & Midwives, Doctors, Dentists, Allied Health Professionals, Pharmacists and Social Workers must register these qualifications with the appropriate statutory professional body. They must and continue to renew their registration regularly in line with the conditions of their statutory body to be able to legally work within their field.

Responsibilities

Employees

As a member of a profession regulated by law, the onus must be on the individual:

- ✓ To register and maintain registration with the appropriate statutory body.
- ✓ Keep documentation relating to registration/re-registration in a safe place.
- ✓ Produce this documentation when requested by the appropriate service or professional managers.
- ✓ On receipt of/or renewal of registration, the employee must ensure that their line manager and/or professional lead is shown original documentation for verification, and copies are taken for the personal file.
- ✓ Contact the appropriate statutory body for proof/evidence/written documentation if requested to provide it; and to
- ✓ Keep the relevant statutory body informed of changes of bank details, address, status, etc., so that internal records are accurate and up to date, and routine renewal advice is received.
- ✓ To undertake continuing professional development (CPD) relevant to their professional registration renewal. The Trust will support any training requirements relevant to this



Line Managers

Line managers are responsible for:

- ✓ Managers are advised to check qualifications and registration details at interview.
- ✓ Ensuring that registered employees renew their registration and complete revalidation as directed by their professional body.
- ✓ Implement systems to maintain records of relevant professional registrations, including expiry and renewal dates.
- ✓ Act promptly on notifications from ESR and HR Operations regarding expiring registrations.
- ✓ In the event of lapsed or non-renewed registration, meet with the employee to establish and document the circumstances. Seek advice from HR Operations to agree on the appropriate course of action.

How this policy works in practice

Registration requirements

Profession	Statutory Body	Renewal
Medical staff	General Medical Council (GMC)	Annual Managing your registration - GMC
Dental staff	General Dental Council (GDC)	Annual Renewal Annual renewal and fees
Nurses & Midwives	Nursing and Midwifery Council (NMC)	Annual Renewing your registration - The Nursing and Midwifery Council
Physiotherapists	Health & Care Professions Council (HCPC)	Every 2 years When to renew The HCPC
Practitioner Psychologists		
Orthoptists		
Paramedics		
Clinical Scientists		
Prosthetists / Orthotists		
Speech and Language Therapists		
Occupational Therapists		
Biomedical Scientists		
Radiographers		
Physiotherapists		
Arts Therapists		
Dietitians		
Chiropodists / Podiatrists		
Hearing Aid Dispensers		
Operating Department Practitioners		
Pharmacists	General Pharmaceutical Council (GPC)	Annual Revalidation and renewal General Pharmaceutical Council
Social Workers	Social Work England (SWE)	Annual Apply to renew - Social Work England

At recruitment stage

The manager must ensure that individuals within their sphere of Management/Professional responsibility hold the appropriate current registration during employment; a copy of this should be kept on the employee's personal file.

The recruitment team will advise prospective employees, in writing, to produce evidence of current registration at the time of interview. The original documentation will be checked by the manager at the interview and a copy taken and uploaded onto the trac recruitment system.

Where de-centralised recruitment is in place, managers will be responsible for writing to prospective employees and completing checks i.e. prisons.

In addition the Recruitment team will check with the statutory body's verification system via the website, on receipt of the candidate's appointment form. The confirmation will be uploaded onto the trac recruitment system. Once the appointment is complete the personal file will be sent to the manager.

On appointment, the manager will complete a new starter form, providing Professional Registration number (PIN) and expiry date then print, sign and send the new starter form to the workforce information inbox for to be entered onto ESR.

Any prospective employee who cannot, for whatever reason, supply these details must be treated with caution and will not be appointed until the individual has contacted the relevant statutory body and produced documentary proof of registration.

In all cases where doubt exists, use should be made by the Manager/ recruitment team of the relevant statutory body's verification system.

When an interviewee is awaiting examination results it should be made clear, usually at interview and confirmed in writing, that any offer of employment is subject to: -

- ✓ satisfactory examination results
- ✓ their intention to register and to produce evidence of that registration as required above prior to commencement

Managers should keep appropriate and adequate records of this information. These records will be reviewed and such action, as the Manager feels appropriate taken to seek/obtain evidence of renewal of registration. These records should be stored securely and be subject to General Data Protection Regulation (GDPR) requirements.

If staff have changed their surname since registration, managers should ensure that the relevant legal certificates are seen e.g. Birth or Marriage certificates.



Renewal of Registration

A monthly Excel database showing expiring registrations for the next 2 months is held by HR Operations for professional registrations required by law with the NMC, HCPC, GPC and Social Work England.

Registrations for staff required by law to maintain registration with the GMC are monitored and reviewed by the Medical Staffing team (see [Medical and Dental Staff](#)).

Bank workers, not substantively employed by the Trust, who are required by law to hold a professional registration are monitored and reviewed by the Temporary Staffing team. (see [Bank Workers and Agency Workers](#)).

Staff whose professional registration is expiring in the following month will be sent [Appendix 1: Professional Registration Expiring Email Reminder](#), copying in their line manager, reminding them of their expiring registration and highlighting the consequences of their registration lapsing.

For staff whose professional registration is expiring in the coming month the HR Advisors will check the relevant professional register for confirmation of renewal and will update the Excel database accordingly also ensuring that ESR is updated (if not updated automatically).

Information is sent to the Professional Leads and Directorate Heads of Nursing on a monthly basis by the Workforce Information team to ensure they are aware of the expiry dates of employees within their remit.

If staff member does not renew their registration as required by law and their registration lapses see [Lapsed/Non-Renewal Registration](#).

Bank Workers and Agency Workers

All agencies supplying staff to the Trust will assure the Trust that they have verified that registration is up-to-date and if required can produce documentary evidence and advise the professional staff who are being supplied to show their registration cards at commencement of duty.

Temporary Staffing Services are responsible for checking professional registrations on engagement for those registered with them in line with the Recruitment and Selection Procedures and this policy.

Temporary Staffing Services will check renewals of registrations in line with this policy, and update ESR accordingly.

Bank and Agency Workers whose professional registration lapses will be blocked from undertaking shifts within the Trust.

Non-medical prescribers

Professional Registered employees who are also Non-Medical Prescribers/have independent prescribing rights, are required to register with their Professional Body.

Seconded Staff

Staff who are seconded into the Trust from another organisation and are required to have a professional registration for their role must also adhere to the individual responsibility requirements for their profession and provide to their supervising manager within the Trust evidence of their registration.

Medical and Dental Staff

Every Doctor and Dentist is required to produce evidence of current registration before being permitted to start work, which will be checked by the Medical Staffing team. These registrations will also be checked with the GMC/GDC (General Medical Council/General Dental Council) verification system and against the list produced by the GMC/GDC of individuals who have been removed from the register. Where Doctors or Dentists from overseas are newly registered and are not yet in possession of a certificate of registration, a member of the Medical Staffing team telephones the GMC/GDC for a verbal assurance and details of the registration number.

Locum Medical and Dental staff are also required to produce evidence of registration, although agencies are committed to checking this part of the contracted service. Agency Locums are asked to bring GMC/GDC certificates with them.

Records of GMC/GDC numbers and expiry dates are kept by the Medical Staffing team who have a protocol for ensuring Medical staff have current and appropriate registration.

All Medical and Dental Staff are sent a letter on the anniversary of renewal of their registration, asking them to provide evidence that this has been done.

The Medical Staffing team will also check with the GMC/GDC online verification system that registration has been renewed. Copies of verification information will be kept on the personal file.

The Medical Staffing team will be responsible for ensuring the up to date registration information is inputted into ESR once renewal information has been checked.

The same procedure for lapsed registration as for other professional staff will be followed.

Professions not regulated by law but registration or accreditation is a role requirement

Psychotherapists (who are not otherwise included under the guidance for practitioner psychologists or IAPT practitioners) are required to either have a core professional qualification or to be registered either with a volunteer register accredited by the Professional Standards Authority or hold accreditation with the BABCP.

Trainee Psychologists (clinical or counselling), who have completed the clinical components of their clinical training but are delayed in the completion of their research thesis, may apply for Band 7 practitioner psychology posts. As they have not yet completed their qualification, they cannot be registered with the HCPC and so may not legally practice as a practitioner psychologist using a protected title.

During this period in which they are completing their qualification and attaining registration with the HCPC, they may be employed at a Band 6 (trainee grade), with additional supervision of their clinical work and research, until full qualification is confirmed, and registration is granted.

CBT therapists, clinical psychologists, counsellors, nurses, occupational therapists, experienced graduate mental health workers or psychotherapists undertaking psychological therapy. They are accredited for the therapeutic work by the British Association of Behavioural and Cognitive Psychotherapies (BABCP).

Where Psychological Therapists are members of regulated healthcare professions overseen by the Professional Standards Authority (e.g., General Medical Council (GMC), the Nursing and Midwifery Council (NMC) or the Healthcare Care Professions Council (HCPC) they are subject to statutory regulation within their core discipline.

Psychological Wellbeing Practitioners (IAPT) currently have no requirement to be registered with a professional body, but training courses are accredited by the British Psychological Society. Practitioners should adhere to their employer's code of conduct and policies, irrespective of their professional affiliations.

Other qualifications/registrations may be a requirement of a post, so must be kept up to date, e.g. CIPD for Human Resources, Finance qualifications, etc.

Where registration or accreditation is a requirement of the role, as stated in the person specification of the role, failure to retain the registration or accreditation may result in disciplinary action.

Suspended Registration

An individual whose registration has been suspended by their professional body is required to declare this to their line manager as soon as they are informed. The line manager should immediately seek advice from the relevant Trust Professional Lead and their Human Resources Representative.

A decision will be made by the line manager in conjunction with the Trust Professional Lead and Human Resources Representative on the way forward in line with the Trust's Disciplinary Policy & Procedure or Capability Policy & Procedure.

Lapsed/Non-Renewal Registration

Any staff member whose professional registration, which is required by law, lapses/is not renewed will not be eligible for employment in positions requiring that registration. If an individual can prove they have done all they practically can do to renew their registration, i.e., the fault is with the processing of the registration by the professional body, individual circumstances and regulatory rules will be taken into account when deciding appropriate action. However, all parties must be aware that while the member of staff is not on the register, for whatever reason, **they must not practice under the protected title.**

Staff members have a personal responsibility to maintain their professional registration required by law in order to undertake their contracted role and are advised by the [Appendix 1: Professional Registration Expiring Email Reminder](#) of the possible contractual implications of failure to do so.

The staff member cannot continue to undertake duties and responsibilities of a registered professional or use the protected title. They will be required to refrain from such duties until registration becomes effective again. Therefore is unlikely to be able to continue in their substantive role. Therefore the line manager must immediately: -

- ✓ Complete and sign the [Appendix 2: Failure to Renew Professional Registration Letter](#)
- ✓ When there is a lapsed professional registration, the individual will be moved to an existing role within the Trust that is not regulated by law and paid at the appropriate unregistered banding until further notice, or the renewal is confirmed and in place.
- ✓ If there are any queries in relation to the Band to be paid, advice should be sought from HR Operations.
- ✓ Complete a Contractual Changes form to be sent with the [Appendix 2: Failure to Renew Professional Registration Letter](#) which then gets sent to Workforce Information at CPFTWorkforceInformation@cpft.nhs.uk for ESR to be updated
- ✓ The Contractual Changes form and [Appendix 2: Failure to Renew Professional Registration Letter](#) must be hand delivered or sent to the staff member by registered post plus Trust email address

Staff must contact their professional bodies' registration department immediately and if necessary, the individual should be advised to present themselves to their governing body in person to try and hasten the process.

Once evidence has been received of renewal of registration a Contractual Changes form confirming new expiry date and reinstatement of role and Band should be sent to Workforce Information at CPFTWorkforceInformation@cpft.nhs.uk for updating on ESR.

The circumstances of the lapsed registration should be investigated by the line manager in line with the Trust's Disciplinary Policy.

If for any reason the individual is not allowed to re-register due to the lapse or continues to take no action to re-register, this will be investigated in line with the Trust's Disciplinary Policy. **This could ultimately lead to summary dismissal for reasons of contravening a statutory requirement of duty or for gross misconduct.**

If the individual requires time off work to organise re-registration, they should use their annual leave. If they have exhausted annual leave, they should then have leave without pay.

Appendix 1: Professional Registration Expiring Email Reminder

Dear

Re: Professional Registration

This is a reminder that your professional registration is due to expire **DATE**.

Please ensure that you renew this prior to expiry and provide your manager with the original renewal certificate and a copy for your personal file. We will also be checking with the relevant professional body that your registration has been renewed.

I would confirm that if you fail to renew registration, which is required by law, you would not be allowed to continue to undertake the duties and responsibilities of your registered profession and will be required to refrain from such duties until registration becomes effective again. For this period of time you would be moved to a role which is not regulated by law and paid at an appropriate banding to the temporary role you will be undertaking for this period.

I would refer you to the Trust's policy, Maintaining Professional Registrations, available on the Trust's intranet through Documents that Guide Practice.

If you have renewed your registration in the last 7 days, please ignore this letter and accept our apologies for this reminder. If your renewals fees are paid by Direct Debit, please review your account to check that the payment/s are being deducted from your accounts and your registration does not lapse due to non-payment.

If you require time off work to facilitate your renewal, please liaise with your manager to discuss annual leave or unpaid leave.

Yours sincerely

HR Advisor

Appendix 2: Failure to Renew Professional Registration Letter

Please state hand delivered or registered post plus Trust email address

Name
Address

Dear

Re: Failure to renew Professional Registration

Following your failure to renew professional registration, and in line with the Trust's policy on maintaining professional registration, I would confirm that you must refrain from undertaking the duties and responsibilities of a professional regulated by law until your registration becomes effective again.

Please find attached Contractual Change form advising that with effect from **(date)** you will be moved to a role which is not regulated by law and paid at an appropriate banding for the temporary role you will be undertaking for this period.

Due to this lapse in registration, I further meeting will be convened to discuss the circumstances around this situation and a decision will be made whether an investigation will take place under the Trust's Disciplinary Policy & Procedure.

As soon as you receive your Professional Registration, please bring the original documentation to me to verify your re-registration.

The Support for Staff at CPFT leaflet enclosed provides key contact details of various teams that you may wish to access for help and support, such as the Health Assured Employee Assistance Programme on 0800 028 0199.

Yours sincerely

Name
Manager

cc. HR Advisor
Professional Lead

Encl. Support for Staff at CPFT leaflet