



Doncaster and Bassetlaw
Teaching Hospitals
NHS Foundation Trust

Professional Registrations Policy - Fitness to Practice

This procedural document supersedes: Professional Registration Policy - Fitness to Practice - CORP/EMP 11 v.8



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Amendment Form

Version	Date Issued	Brief Summary of Changes	Author
Version 9	23 December 2025	Review for factual accuracy and updated process for lapse in registration	Kelly Fairhurst
Version 8	8 October 2019	Review for Factual Accuracy and changing of logo and Care Groups/Directorates to Divisions. Change from NCAS to NHS resolutions. Added conditions of practice and interim suspension orders.	Adam Evans
Version 7	17 December 2015	<p>Title change.</p> <p>This policy supersedes: Professional Registration Policy - CORP/EMP 11 v.6 and Procedure – Receipt & Issue of Alert Letters -CORP/EMP 18 v.3.</p> <p>Reflects current practice and covers a wider spread of professions.</p>	Joanne Lodge

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1 INTRODUCTION

Our people are key to the continuing success of Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust (DBTH) and the safe provision of services to our patients.

To do that we must ensure that all prospective, and current employees are registered by the appropriate regulatory body and hold the right qualifications to do their job.

2 PURPOSE

The purpose of this policy is to ensure that we have a clear, consistent and fair approach to monitor the professional qualifications and registration status of all healthcare professionals within DBTH. This includes the monitoring of Healthcare Professional Alert Notices (Alert Notices), to ensure the safest environment for our patients.

‘Professional regulation is intended to protect the public, ensuring that those who practice in a particular profession are committed to providing high standards of care.’ ([*NHS Employers- Professional Registrations and Qualifications Check*](#)). It is therefore a contractual condition of employment that a health professional maintains their registration throughout their employment with DBTH, and it is their personal responsibility to keep it up to date.

3 DUTIES AND RESPONSIBILITIES

For the policy and procedure to be effective, everyone involved in either the recruitment of, or management of health professionals or non-health professionals requiring registration need to be aware of this policy.

Ultimately, it is the responsibility of the senior management of the Trust (including the Chief Executive, Executive Team and Divisional Directors); in conjunction with People & Organisational Development Department to ensure that this is the case.

3.1 DBTH Executive Team and Division/Directorate Senior Management Teams

- The Chief Executive is accountable to the Trust Board for ensuring that the Trust is compliant with professional registration requirements.
- Executive Directors are accountable to the Chief Executive for ensuring that within their areas of responsibility, professional registrations are continually reviewed and monitored.
- Within their agreed area of responsibility, Senior Managers are responsible for ensuring professional registrations are valid and up to date.
- The Chief Nurse (or nominated deputy) will receive escalated concerns for nursing, midwifery and Allied Health Professionals who require NMC/HCPC registration
- The Executive Medical Director (or nominated deputy) will receive escalated concerns for Medical, Dental and Health Care Scientist Professionals requiring GMC/HCPC registration

3.2 Chief People Officer

- To ensure that the Professional Registrations Policy - Fitness to Practice and all relevant procedures are effectively managed

3.3 Recruitment and Medical HR Team

- To undertake registration and qualification checks as part of pre-employment checks including the Healthcare Professional Alert Notice (HPAN) check in accordance with the NHS Employment Check Standards which is a mandatory requirement for all NHS roles.
- To escalate to the appropriate senior manager any conditions or declaration of pending investigation on a potential new starter's registration status.

3.4 People Systems Team

- To provide professional registration compliance reports at a Trust-wide, Division/Directorate and departmental level on a monthly basis to highlight employees with expired registrations and those due to expire in the next month.

3.5 Hiring/Line Manager

- To inform prospective employees that offer of appointments are conditional upon evidence satisfactory registration and qualification checks through providing relevant details in job descriptions and person specifications.
- To ensure that any conditions on professional practice are adhered to.
- To ensure a robust process is in place for maintaining and recording professional registrations and renewal dates.
- To review regular reports from the People Systems team and take action to inform registered people of the requirement to renew and maintain the appropriate registration
- To provide training, mentoring, re-skilling etc. where appropriate to ensure practitioners are fit and safe to work and can adhere to their responsibilities.
- To seek advice from the People & OD Department in relation to any concerns regarding the registration status of a member of their team.
- To escalate to the relevant Senior Manager as soon as they are aware of any lapse/conditions on an employee's registration status.
- To ensure no clinical activity which requires registration is undertaken by healthcare employees who are not registered or when registration has lapsed.

3.6 Registered People (Health, non-health professionals, and agency workers)

- To accept responsibility for maintaining their professional registration.
- To remain continuously registered and renew membership annually including when absent from work due to sickness, parenting leave etc.

- To inform their line manager immediately of any restrictions new/old linked to their registration and not undertake any duties for which registration is required. Withholding or providing misleading/false information could lead to withdrawal of offer of employment / termination of employment.
- To comply with reminder notifications received from their registering body.
- To advise their line manager immediately of anything that may potentially compromise their registration e.g. Police investigations, cautions, health conditions, etc.
- To provide evidence of re-registration on an annual basis or when requested.
- To inform the registering body and their line manager of changes to their circumstances eg name, address etc.

4 PROCEDURE

This policy, and the related procedures, covers all activities that form part of the professional registration process. It applies to:

- All health professionals employed by DBTH (full time and part time),
- Non-health professionals, where specific qualifications are a mandatory requirement for their position. (e.g. Accountants)
- People undertaking work for, but not directly employed by, DBTH (e.g. honorary contract)

In addition, some employee groups have additional or separate arrangements in place:

- Agency workers – it is the responsibility of external agencies providing the health professional to confirm professional registration/qualifications.

4.1 Recruiting New Professionals

Hiring Managers must ensure that adverts, job descriptions and person specifications clearly indicate the type and level of professional registration required.

On conditional offer of employment, the Recruitment Team/ Medical HR Team will check the registration for the preferred candidate using the Professional Body's online checking system (where available). This will check:

- They hold appropriate registration for the role being offered
- There are no current restrictions or conditions on their registration that will affect their ability to undertake the full remit of the role being offered
- There are no previous restrictions, conditions or suspensions that do not align with the Trust Values and the DBTH Way.

In addition, the Recruitment/Medical HR Team will check on NHS Resolution's online Performer and Healthcare Professional Check System to ensure there are no Healthcare Professional Alert Notices (HPANs). Further details about HPANs can be found in section 4.4.

Should there be any concerns regarding the registration status identified through the online checking system or declared on the Model Declaration Form the Hiring Manager will be informed immediately. Escalation to the Chief Nurse or Executive Medical Director (or nominated deputy) will be required to determine continuation of the offer of appointment.

4.2 Existing DBTH employees

All professionals requiring registration by a professional body are responsible for ensuring their registration is valid at all times. ESR Notifications will be sent to both professionals and line managers.

In addition, every month, the People Systems team will send a report to divisions/ directorates containing the details of professionals whose registration is due to expire in the next month, or where the registration has already expired. The Line Manager should remind the professional of their registration renewal date and the requirement to maintain professional registration at all times.

Any lapse in registration should be escalated to the Senior Manager who must discuss with the Chief Nurse/Executive Medical Director (or nominated deputy) as soon as possible. A lapse in registration can lead to suspension/exclusion without pay or possible dismissal where lapses in registration are not acted upon within a reasonable period of time.

4.3 Failure to re-register

Where there is no evidence on the appropriate professional body website of current and/or valid registration for whatever reason, the line manager will immediately discuss with the Chief Nurse or Executive Medical Director (or nominated deputy), as appropriate dependent on the professional registration, the requirement to suspend/exclude without pay.

It is the responsibility of the line manager to investigate the circumstances surrounding the failure to have current and/or valid registration. A preliminary investigation should be undertaken, taking a Just Culture approach, to establish the facts and understand the reason for not having registration status, which should be done in accordance with the Disciplinary Policy and in conjunction with the People Business Partner Team. The outcome of the investigation will determine if there are any mitigating factors and if any further action required.

An employee will only be reinstated to full duties when registration has been verified on the relevant online portal for the professional body by the line manager and discussed with the People Business Partner Team.

Continued failure to renew registration, unwarranted delays or suspension/removal from the professional body register will result in disciplinary action and may lead to dismissal.

5 HEALTHCARE PROFESSIONAL ALERT NOTICE (HPAN):

NHS Resolution are responsible for the management of the Healthcare Professional Alert Notices (HPANs) system. This is a system where notices are issued by NHS Resolution to inform NHS bodies and others about health professionals who may pose a significant risk of harm to patients, staff or the public.

HPANs are usually used whilst the regulator is considering the concerns and provides an additional safeguard during the pre-employment checking process.

It will also confirm whether that person may continue to work, seek additional or other work in the NHS as a healthcare professional or whether that person falsely represents themselves as a registered healthcare professional.

If an individual is subject to an alert notice, the Trust must check whether there are any restrictions which would prevent the professional from undertaking the duties of the role being applied for, prior to allowing them to take up the appointment

The Recruitment and Medical HR Team use NHS Resolution's online Performer and Healthcare Professional Check, to check the status of successful applicants as part of the standard pre-employment check process. No unconditional offer of employment will be made until this check has been completed in conjunction with all other pre-employment checks. Any concerns will be escalated to the Chief Nurse or Executive Medical Director (or nominated deputy) as appropriate dependent on the professional registration.

5.1 Issue of HPAN Process:

The Trust Executives can request an alert notice is issued in circumstances where a healthcare professional (or a person represents themselves as a registered healthcare professional.):

- poses a significant risk of harm to patients, staff or the public;
- may continue to work or seek additional or other work in the NHS as a healthcare professional

If a manager considers an alert notice may be appropriate for former employee advice can be provided by the People Business Partner Team.

6 FRAUD

It should be noted that it is a criminal offence for a person to make any false representation or deliberate omission in the recruitment or ongoing employment process. This would include but is not limited to false declarations/omissions about their registration status and/or ongoing professional body actions that may affect registration. Any identified concerns of this type will be referred to the Local Counter Fraud Specialist (LCFS) for investigation. Breaches of this policy's requirements may render any person liable to criminal and/or formal action in accordance with the Disciplinary Procedure.

7 TRAINING/ SUPPORT

For hiring managers, advice and support is available from People & OD

For managers of existing health professionals, support is available from the respective professional regulatory body, NHS Resolution, Chief Nurse's Office, the Medical Directors Office and their People Business Partner.

8 MONITORING COMPLIANCE WITH THE PROCEDURAL DOCUMENT

What is being Monitored	Who will carry out the Monitoring	How often	How Reviewed/ Where Reported to
Non-compliance of policy by Divisions and Directorates	People & Organisational Development	On-going	Issues to be reported to respective Division and Directorate management

			teams at Accountability Meetings
Review of Policy	People & Organisational Development	On-going	Amendments to reflect guidance from NHS Employers, changes in best practice, or changes introduced by professional regulatory bodies.
Compliance at Division/Directorate level	Division/ Directorate Senior Management	On-going	Managers review with Division and Directorate management teams as part of recruitment and workforce monitoring.
Compliance of Policy	Internal Audit	Annual Audit Practice	As per annual audit practice
Compliance with Policy	Senior Responsible Manager for respective health professional group	On-going	<ul style="list-style-type: none"> • Review of management information • Regular review of the alert letter monitoring system.

9 DEFINITIONS

GDC	<u>General Dental Council</u>
GMC	<u>General Medical Council</u>
GOC	<u>General Optical Council</u>
GPhC	<u>General Pharmaceutical Council</u>
HCPC	<u>Health & Care Professions Council</u>
NHS Resolution	<u>NHS Resolution Website</u>
NHS Employers	<u>NHS Employers Website</u>
NMC	<u>Nursing and Midwifery Council</u>
Regulatory Body	Independent organisations who set standards for health professionals to follow, and who take action when patient safety is at risk. (See Section 10).

10 EQUALITY IMPACT ASSESSMENT

The Trust aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are disadvantaged over others. Our objectives and responsibilities relating to equality and diversity are outlined within our equality schemes. When considering the needs and assessing the impact of a procedural document any discriminatory factors must be identified.

An Equality Impact Assessment (EIA) has been conducted on this procedural document in line with the principles of the Equality Analysis Policy (CORP/EMP 27) and the Civility and Respect & Resolution Policy (CORP/EMP 58).

The purpose of the EIA is to minimise and if possible remove any disproportionate impact on employees on the grounds of race, sex, disability, age, sexual orientation or religious belief. No detriment was identified. (See Appendix 1)

11 ASSOCIATED TRUST PROCEDURAL DOCUMENTS

- Disciplinary Procedure (CORP/EMP 2)
- Equality Analysis Policy (CORP/EMP 27)
- Fraud, Bribery and Corruption Policy & Response Plan (CORP/FIN 1 (D))
- Recruitment & Selection Policy (CORP/EMP 36)

12 DATA PROTECTION

Any personal data processing associated with this policy will be carried out under 'Current data protection legislation' as in the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) 2021.

For further information on data processing carried out by the trust, please refer to our Privacy Notices and other information which you can find on the trust website: <https://www.dbth.nhs.uk/about-us/our-publications/information-governance/>

13 REFERENCES

General Dental Council (GDC) <https://www.gdc-uk.org/Pages/default.aspx>

General Medical Council (GMC) <https://www.gmc-uk.org/>

General Optical Council (GOC) <https://www.optical.org/>

General Pharmaceutical Council (GPhC) <https://pharmacyregulation.org/>

Health & Care Professions Council (HCPC) <https://www.hpc-uk.org/>

NHS Employers [Updates to NHS employment checks resources | NHS Employers](#)

Nursing & Midwifery Council (NMC) <https://www.nmc.org.uk/>

APPENDIX 1 - EQUALITY IMPACT ASSESSMENT PART 1 INITIAL SCREENING

Policy	Division/Directorate and Department	Assessor (s)	New or Existing Policy?	Date of Assessment
CORP/EMP 11 v.8 - Professional Registrations Policy - Fitness to Practice	People and Organisational Development	Kelly Fairhurst	Existing Policy	November 2025
1. Who is responsible for this policy? P&OD				
2. Describe the purpose of the policy? Process/guidance on implementation of professional registration legislation.				
3. Are there any associated objectives? Provide consistent approach to implementation of legislation and processes across the Trust				
4. What factors contribute or detract from achieving intended outcomes? Staff may be unaware of their roles & responsibilities				
5. Does the policy have an impact in terms of age, race, disability, gender, gender reassignment, sexual orientation, marriage/civil partnership, maternity/pregnancy and religion/belief? No				
<ul style="list-style-type: none"> If yes, please describe current or planned activities to address the impact N/A 				
6. Is there any scope for new measures which would promote equality? No				
7. Are any of the following groups adversely affected by the policy?				
a. Protected Characteristics	Affected?	Impact		
b. Age	No			
c. Disability	No			
d. Gender	No			
e. Gender Reassignment	No			
f. Marriage/Civil Partnership	No			
g. Maternity/Pregnancy	No			
h. Race	No			
i. Religion/Belief	No			
j. Sexual Orientation	No			
8. Provide the Equality Rating of the service/ function/policy /project / strategy				
Outcome 1 ✓	Outcome 2	Outcome 3	Outcome 4	
9. Date for next review: November 2028				
Checked by: Adam Evans Date: December 2025				