

# Professional registration and qualification checks

July 2010 (updated May 2011)

# About the NHS Employment Check Standards

This document outlines the professional registration and qualification checks that NHS organisations must carry out for the appointment and ongoing employment of all individuals in the NHS. It is one of a set of six documents that make up the *NHS Employment Check Standards*.

NHS Employers has developed these standards with the Department of Health and employers in the NHS. The standards include those checks that are required by law, those that are Department of Health (DH) policy and those that are required for access to the NHS Care Record Service.

These standards replace previous NHS Employers guidance on safer recruitment and describe the employment checks that NHS organisations must carry out to meet the Department of Health's core standards, outlined within the Standards for Better Health. From April 2010, all NHS providers (whether NHS organisations or private providers) need to be registered with the Care Quality Commission (CQC), formerly the Healthcare Commission. NHS providers will be required to show evidence of compliance with the *NHS Employment Check Standards* as part of the CQC's annual regulatory framework.

Failure to comply with these standards could potentially put the safety and even the lives of patients, staff and the public at risk.

The NHS Employment Check standards are mandatory for all applicants for NHS positions (prospective employees) and staff in ongoing NHS employment. This includes permanent staff, staff on fixed-term contracts, volunteers, students, trainees, contractors, highly mobile staff and staff supplied by an agency. Trusts using agency, contractor or other external bodies to provide NHS services must ensure, through regular audit and monitoring, that their providers comply with these standards.

## **Avoiding discrimination**

Employers must avoid unlawfully discriminating in their recruitment processes on the grounds of ethnicity, disability, age, gender, religion and belief, or sexual orientation. To avoid discrimination employers must treat all job applicants in the same way at each stage of their recruitment process.

## **Recording and protecting data**

NHS employers must carry out all checks in compliance with the Data Protection Act 1998. Information should only be obtained where it is essential to the recruitment decision and kept in accordance with the Act. Employers must record the outcome of all pre-employment checks, using Electronic Staff Record (ESR), where available, or an alternative HR management system. These checks are also part of the information governance and assurance standards linked to the use of the NHS Care Record Service (NHS CRS). For more details visit [www.connectingforhealth.nhs.uk/systemsandservices/rasmartcards](http://www.connectingforhealth.nhs.uk/systemsandservices/rasmartcards)

# Contents

<b>Introduction</b>	<b>4</b>
<b>GMC licence to practise requirements (from 16 November 2009)</b>	<b>5</b>
<b>Checking registration with statutory regulatory bodies</b>	<b>10</b>
<b>Alert notices</b>	<b>11</b>
<b>Qualification checks</b>	<b>11</b>
<b>Withdrawal of a provisional offer of appointment</b>	<b>11</b>
<b>Doubts on authenticity of information</b>	<b>11</b>
<b>Further information</b>	<b>12</b>

## Introduction

The purpose of registration and qualification checks is to ensure that a prospective employee is recognised by the appropriate regulatory body and that they have the right qualifications to do the job.

Employers must make it clear to prospective employees that appointment to any position is conditional on a satisfactory registration check and qualification checks, and that any information disclosed on the application form will be checked.

Prospective employees must also be informed that any offer of appointment may be withdrawn if they knowingly withhold information, or provide false or misleading information, and that employment may be terminated should any subsequent information come to light once they have been appointed.

## Professional registration checks

Professional regulation is intended to protect the public, making sure that those who practise a health profession are doing so safely. Employers must check the registration of health professionals with the relevant regulatory body.

Where a check has been made by the relevant regulatory body it should not be necessary to verify qualifications separately. Employers must have the consent of the health professional and their registration number in order to check the registration.

It should be a 'contractual condition subsequent' that the healthcare professional has registration throughout their employment. In the event that an individual has no registration, the employment will have been deemed to have ended by operation of the law.

## GMC requirements for licence to practise

From 16 November 2009, all doctors are required by law to be both registered with the GMC and hold a licence to practise before they can undertake any form of medical practice. This requirement applies to any employed or self employed doctor and is inclusive of any full time, part time, or locum contract. It also includes positions within both private healthcare and in the NHS, including GPs.

This new approach to medical regulation requires doctors to demonstrate to the GMC on a regular basis that they remain up to date and of their fitness to practise. Licensing is the first step towards the introduction of revalidation. In future, all doctors will need to revalidate regularly, usually every five years, if they wish to keep their licence to practise. Revalidation will have three elements:

- to confirm that licensed doctors are practising in compliance with GMC standards (Good Medical Practice)
- to confirm that doctors on the GMC's specialist register or GP register continue to meet the standards appropriate to their speciality
- to identify for further investigation, and remediation, poor practice where local systems are not robust enough to do this or do not exist.

The GMC held a consultation which ran from 1 March to 4 June, entitled 'Revalidation: the way ahead', which focused on the following four themes:

- how revalidation will work
- what doctors, employers and contractors of doctors' services will need to do
- patient and public involvement in revalidation
- how and when revalidation will be introduced.

The medical revalidation pilot has been extended for a further year and will now run throughout 2011/12.

Employers will need to review any contracts that currently require doctors to possess registration with the GMC and revise (where appropriate) any policies and procedures they have in place for conducting pre-employment checks in compliance with these requirements. Verification of a doctor's GMC registration and licence to practise status may be carried out through the GMC or through Electronic Staff Record (ESR).

Further information about the process and new requirements which will be imposed when revalidation comes into force can be found at [www.nhsemployers.org/PlanningYourWorkforce/MedicalWorkforce/MedicalRevalidation](http://www.nhsemployers.org/PlanningYourWorkforce/MedicalWorkforce/MedicalRevalidation)

### Qualification checks

Qualification checks verify the information about educational or professional qualifications that a prospective employee provides on their application form. For non-health professionals, qualifications that form part of the requirements for a position must be checked.

Applicants may not always have the original documentation and employers need to use appropriate discretion and take proportionate action. The level of checks carried out should be proportionate to the level of risk to the individual role and the priority given in the person specification to the qualification, or the opportunity to cause harm or damage, in that position.

### Checking registration with statutory regulatory bodies

There are currently eight regulatory bodies covering the health professions and, in total, they have around 1.1 million health professionals on their registers. Their four main functions are:

- establishing standards of competence, ethics and conduct
- establishing standards for training
- keeping a register of those who meet the standards
- dealing with registrants who fall short (eg, by placing conditions on their registration or erasing them from the register).

### What employers should ask for in every case

Before NHS employers appoint any health professional they must always check the following three areas:

- that the applicant is registered to carry out the proposed role
- whether the registration is subject to any current restrictions that might affect the duties proposed
- if the applicant has investigations against them about their fitness to practise that the regulatory body has a duty to disclose.

Each regulatory body has different procedures for disclosing fitness to practise information and these are discussed below.

### General Medical Council (GMC)

The GMC can confirm a doctor's:

- full name
- GMC reference number
- dates of registration (provisional, full, specialist or limited)
- licence to practise
- current registered address
- sex
- current registration status
- primary medical qualification
- specialist qualifications
- due date for annual retention fee.

The GMC has the power to suspend or place conditions on a doctor's registration. Interim orders can be imposed to protect the public, pending a full investigation. Details of interim orders appear on the GMC website [www.gmc-uk.org](http://www.gmc-uk.org)

Details of a doctor's suspension or any relevant conditions or undertakings are included on the level-three online search, which is available to employers. When a formal warning has been issued, under the reformed fitness to practise procedures, details of such a warning will also be included. At present, the GMC will only include current suspensions, conditions, undertakings or warnings. A search will bring up current information. Information that is five years old or more will not be included but is available through a link to the individual record.

The GMC is required by law to issue doctors with a certificate to verify that they have either been granted with provisional or full registration. However, this certificate does not state whether or not a doctor holds a licence to practise. Since November 2009, employers must check both the doctor's registration status and their licence to practise prior to engaging them to undertake any form of medical practice in the UK (this includes where the individual is responsible for writing prescriptions or signing death or cremation certificates and holding certain medical posts such as working as a doctor in the NHS).

All registered doctors are entitled to a licence to practise and providing they remain registered with the GMC, this is normally issued automatically. If the doctor does not have a licence to practise, the employer must refer to the GMC immediately so that they can 'fast track' their application. There is no charge for the 'fast track' service. To process their application, the GMC will require a declaration from their current or previous employer, and a certificate of good standing if the doctor has been working outside the UK.

Employers can check the individual's GMC registration status and whether they hold a licence to practise in one of the following ways:

- by going onto the GMCs online register (the List of Medical Practitioners) at [www.gmc-uk.org](http://www.gmc-uk.org) and entering the individual's GMC reference number. This will state either that they are registered 'with a licence to practise' or that they are 'registered without a licence to practice'
- by filling in the enquiry form at [www.gmc-uk.org](http://www.gmc-uk.org)

- by phoning the contact centre on 0161 923 6602. Callers ringing the contact centre may also access a faxback service by pressing option one and following the step-by-step telephone instructions
- by email, including the doctor's name and GMC reference number, the employer's name, trust and contact number, sent to [registrationhelp@gmc-uk.org](mailto:registrationhelp@gmc-uk.org)
- by writing to the General Medical Council, 3 Hardman Street, Manchester, M3 3AW.

Alternatively, employers may use ESR to verify their doctor's GMC status.

Further information about registration requirements and the introduction of revalidation from 2011 can be found on the GMC website at [www.gmc-uk.org](http://www.gmc-uk.org)

## Nursing & Midwifery Council (NMC)

The NMC can provide registration information on registered nurses and midwives and will inform an employer if a practitioner has the following status:

- removed
- restored
- conditions of practice
- cautioned
- suspended
- lapsed
- effective.

It will not show if someone is under investigation. For further information on the status of a practitioner an employer would need to write to the NMC's fitness to practise department.

The NMC website also contains an NMC circulars page, which includes details of practitioners who have been struck off, suspended or cautioned during the previous month. The NMC keeps this information online for three months. Previous circulars can be obtained on request.

The NMC offers three ways to confirm registration status:

- online at [www.nmc-uk.org](http://www.nmc-uk.org)
- through the automated registration confirmation hotline (available 24 hours a day, seven days a week), which generates a written report at the end
- by writing for confirmation to: Nursing and Midwifery Council, 23 Portland Place, London, W1B 1PZ.

Employers can also contact the NMC by telephoning or emailing one of the following:

- for registration enquiries and general advice: [periodics@nmc-uk.org](mailto:periodics@nmc-uk.org) or Tel: 0207 333 9333
- for general overseas enquires: [overseasreg@nmc-uk.org](mailto:overseasreg@nmc-uk.org) or tel: 0207 333 6600; or for completed NMC overseas application forms contact: [overseas.application@nmc-uk.org](mailto:overseas.application@nmc-uk.org)
- for fitness to practise enquiries: [fitness.to.practise@nmc-uk.org](mailto:fitness.to.practise@nmc-uk.org) or tel: 0207 462 5801/5811

## Health Professions Council (HPC)

The following health professionals are regulated by the HPC:

- arts therapists
- biomedical scientists
- chiropodists
- podiatrists
- clinical scientists
- dieticians
- occupational therapists
- operating department practitioners
- orthoptists
- paramedics
- physiotherapists
- prosthetists
- orthotists
- radiographers and
- speech and language therapists.

A health professional's registration status can be checked on the HPC's website at [www.hpc-uk.org](http://www.hpc-uk.org). Any changes to a health professional's registration status are immediately entered onto the register. Fitness to practise cases are listed on the website and after a hearing, the decision is posted online.

Employers are strongly encouraged to use the HPC's online register, but if this is not possible, registration can also be checked:

- by phone on 0845 300 4472 or 0207 840 9802
- by emailing [registration@hpc-uk.org](mailto:registration@hpc-uk.org)
- by writing to the Health Professions Council, Park House, 184 Kennington Park Road, London, SE11 4BU.

For further information on fitness to practise contact the Fitness to Practise (FPT) team either by phone on 0207 840 9814 (Monday to Friday 9am to 5pm) or by emailing [ftp@hpc-uk.org](mailto:ftp@hpc-uk.org).

## General Pharmaceutical Council (GPhC)

The GPhC (formerly the Royal Pharmaceutical Society of Great Britain) provides details of pharmacists who hold full-time, part-time, retired or overseas registration and details of current and recent fitness to practise inquiries.

A pharmacist's eligibility to practise in Great Britain depends on their type of registration, which is shown in their entry on the register. Pharmacists who have paid the retention fee will have either 'P' (practising) or 'NP' (non-practising) in their entry. Pharmacists who have not yet paid the retention fee will have either f, p, r, l, or o in their entry. Only pharmacists holding full-time (f) or part-time (p) registration are eligible to practise. Pharmacists holding retired (r), ill health (i) or overseas (o) registration are not eligible to practise.

Registration can be confirmed:

- online at [www.pharmacyregulation.org](http://www.pharmacyregulation.org), by entering the pharmacist's registration number or using their name

- by phone on 027 3365 3400
- by writing to the General Pharmaceutical Council (GPhC), 129 Lambeth High Street, London, SE1 7BT. Employers will need the member's registration number, full surname and forename, date of registration and postal town of their registered address.

Details of current and recent fitness to practise inquiries can also be obtained from the website [www.pharmacyregulation.org](http://www.pharmacyregulation.org)

## General Dental Council (GDC)

The GDC holds two registers that provide registration information on all dental care professionals:

- The Dentists Register, and
- The Dental Care Professionals Register which includes dental hygienists, dental therapists, orthodontic therapists, clinical dental technicians, dental nurses and dental technicians.

Some of the information required is not publicly available in the Dentists Register and employers will need to provide evidence of the dental care professional's consent to access it. The consent form must be signed by the dental care professional and must include:

- their full name
- their GDC registration number.

Employers will also need to check applicants who may be registered on the temporary register. Overseas qualified dentists can apply for temporary registration in specific approved posts if they hold a dental qualification that is recognised by the GDC for the purposes of temporary registration and the International Qualifying Exam. This allows them to work with supervision in dental schools or hospitals and, in a limited number of cases, in primary care dental settings for training, teaching or research purposes only and for a limited period. Apart from these approved settings, temporary registration will not allow dentists to work in general or private practice, or in the community dental services.

Employers can check registration status and obtain information about any fitness to practise proceedings in one of the following ways:

- online at [www.gdc-uk.org](http://www.gdc-uk.org)
- by phone on 0207 887 3800
- by writing to: General Dental Council, 37 Wimpole Street, London, W1G 8DQ.

## General Optical Council (GOC)

The GOC provides registration information on optical professionals and publishes details of recent and future fitness to practise hearings. Employers must check a registrant's status in one of the following ways:

- online at [www.optical.org](http://www.optical.org)
- by phone on 0207 580 3898
- by writing to the General Optical Council, 41 Harley Street, London, W1G 8DJ.

## General Osteopathic Council (GOSC)

An osteopath's registration status can be verified on the GOSC's website at [www.osteopathy.org.uk](http://www.osteopathy.org.uk). Further information concerning fitness to practise proceedings can be obtained:

- by phone on 0207 357 6655
- by writing to the General Osteopathic Council, 176 Tower Bridge Road, London, SE1 3LU.

## General Social Care Council (GSCC)

A social worker's registration can be checked on the GSCC website at [www.gsc.org.uk](http://www.gsc.org.uk). Employers can search online by name or town where the social worker is currently employed, or by social care registration number.

The absence of a record does not necessarily mean that the worker is not registered.

If the search is unsuccessful, the employer can contact the GSCC in one of the following ways:

- by phone on 0845 070 0630
- by emailing [registration@gsc.org.uk](mailto:registration@gsc.org.uk)
- by writing to the General Social Care Council, Goldings House, 2 Hay's Lane, London, SE1 2HB.

## General Chiropractic Council (GCC)

The GCC takes a transparent approach to providing information on proceedings and findings in relation to fitness to practise for chiropractors. Its disclosure policy is available on its website [www.gcc-uk.org](http://www.gcc-uk.org), which also provides:

- notices about current professional conduct committee and health committee hearings
- a list of chiropractors who have been subject to proceedings in the past.

Employers must check a chiropractor's registration in one of the following ways:

- accessing the online database at [www.gcc-uk.org](http://www.gcc-uk.org)
- by phone on 0207 713 5155
- by email to one of the following addresses:  
[enquiries@gcc-uk.org](mailto:enquiries@gcc-uk.org) for general enquiries  
[registration@gcc-uk.org](mailto:registration@gcc-uk.org) for registration enquiries  
[regulation@gcc-uk.org](mailto:regulation@gcc-uk.org) for regulatory enquiries  
[education@gcc-uk.org](mailto:education@gcc-uk.org) for education enquiries; or
- by writing to the General Chiropractic Council, 44 Wicklow Street, London, WC1X 9HL.

## Alert notices

NHS bodies are required to implement and manage the alert scheme in accordance with the *Healthcare Professionals Alert Notices Directions 2006*, which came into force on 6 December 2006. These requirements are mandatory for NHS bodies covered by the Directions (they are advisory for Foundation Trusts).

An alert notice is a way of notifying NHS bodies, or other organisations providing services to NHS bodies, about registered health professionals whose performance or conduct could pose a significant risk of harm to patients, staff or the public. Employers must check their alert notice files prior to recruiting an individual. If an individual is subject to an alert notice then employers must check whether they are suitable to be employed into the position being offered.

Further guidance on what to do when an applicant is the subject of an alert notice can be found on the NHS Employers website at [www.nhsemployers.org](http://www.nhsemployers.org)

## Qualifications

If a qualification is essential for the position, employers must:

- request original certificates and take copies
- check that the details on certificates match those the prospective employee provides as part of their application
- contact the awarding body directly, where possible, to confirm the applicant's attendance, course details and grade awarded.

If a prospective employee has gained their qualifications overseas, employers will need to check that this qualification exists, that it is equivalent to the stated UK qualification and that the prospective employee does, in fact, hold the qualification. These checks should be carried out directly with the awarding institution, where possible. Where this is not possible, you should seek advice from the relevant country's UK embassy, consulate or high commission. Further advice and contact details can be found on the Security Industry Authority website at:

[www.the-sia.org.uk](http://www.the-sia.org.uk) and the Foreign and Commonwealth website at: [www.fco.gov.uk](http://www.fco.gov.uk)

If there is any doubt that qualifications are genuine, contact the National Academic Recognition Centre (NARIC) at [www.naric.org.uk](http://www.naric.org.uk).

## Withdrawal of a provisional offer of appointment

Appointment should not be taken up until all relevant checks have been completed satisfactorily. If there is an urgent need to employ someone quickly, the offer of appointment should be provisional and conditional on the satisfactory outcome of these checks. The conditions of a provisional offer of appointment must be made clear to the employee, in writing. Employers should have procedures in place for dealing with the withdrawal of provisional arrangements.

## Doubts on authenticity of information

Your checks may return information that contradicts the details provided by the applicant and raises concerns. In this situation you should:

- proceed in a sensitive manner – there is often a reasonable explanation for apparent inconsistencies
- attempt to address your concerns directly with the candidate – you may wish to call them back for a second interview so that you can follow up with the relevant sources.

In exceptional circumstances, where your checks reveal substantial misdirection, you may feel it would be appropriate to report your concerns to the local police.

## Further information

Every effort is made to ensure that the requirements within these standards are updated in line with new legislation and DH policy as it comes into force. Where employers choose to download hard copies of the standards, it is essential that they regularly refer to the NHS Employers website to ensure that they are fully compliant with any updated legal and mandated requirements. Alerts to any changes to these standards are published in the NHS Workforce Bulletin, which you can download or subscribe to at: [www.nhsemployers.org/workforcebulletin](http://www.nhsemployers.org/workforcebulletin)

Visit [www.nhsemployers.org/employmentchecks](http://www.nhsemployers.org/employmentchecks)

Email [employmentchecks@nhsemployers.org](mailto:employmentchecks@nhsemployers.org)

## NHS Employers

supporting • promoting • representing

NHS Employers represents trusts in England on workforce issues and helps employers to ensure the NHS is a place where people want to work. The NHS workforce is at the heart of quality patient care and we believe that employers must drive the workforce agenda. We work with employers to reflect their views and act on their behalf in four priority areas:

- pay and negotiations
- recruitment and planning the workforce
- healthy and productive workplaces
- employment policy and practice.

**NHS Employers is part of the NHS Confederation.**

## Contact us

For more information on how to become involved in our work, email [getinvolved@nhsemployers.org](mailto:getinvolved@nhsemployers.org)

[www.nhsemployers.org](http://www.nhsemployers.org)  
[enquiries@nhsemployers.org](mailto:enquiries@nhsemployers.org)

NHS Employers  
29 Bressenden Place, London SW1E 5DD

2 Brewery Wharf, Kendell Street,  
Leeds LS10 1JR

Published July 2010. © NHS Employers 2010.

This document may not be reproduced in whole or in part without permission.

The NHS Confederation (Employers) Company Ltd. Registered in England.  
Company limited by guarantee: number 5252407