Professional registration and qualification checks

July 2013
This document outlines the professional registration and qualification checks that NHS organisations (across England) are required to undertake in the appointment and ongoing employment of individuals in the NHS. It is one of a set of six documents that make up the NHS Employment Check Standards.

The NHS Employers organisation has developed these standards with the Department of Health and employers in the NHS. The standards, last updated July 2013, include those that are required by law, those that are determined by Department of Health (DH) policy in relation to compliance with the Government’s core standards outlined within the Standards for Better Health, and those required for access to the NHS Summary Care Record (NHS SCR).

All NHS providers (including NHS organisations and private providers) are required to be registered with the Care Quality Commission (CQC) and, as part of this registration, are required to comply with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010 and the Care Quality Commission (Registration) Regulations 2009. The CQC’s Essential Standards of Quality and Safety outline 16 core standards which must be met, including having robust recruitment practices in place (Outcome 12: Requirements relating to workers, specifically refers). NHS providers should therefore provide 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 apply to all applications for NHS positions (prospective employees) and staff in ongoing NHS employment. This includes permanent staff, staff on fixed-term contracts, volunteers, students, trainees, contractors NHS, highly mobile staff, temporary workers (including locum doctors), those working on a trust bank, and other workers supplied by an agency. Trusts using agency, contractor or other external bodies to provide services must ensure, through regular audit and monitoring, that their providers comply with these standards.

Avoiding discrimination
Under the Equality Act 2010, employers must not unlawfully discriminate in their recruitment processes on the grounds of ethnicity, disability, age, gender or gender re-assignment, religion or belief, sexual orientation, pregnancy or maternity, marriage or civil partnership. 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 absolutely essential to the recruitment decision and kept in accordance with the Act. Employers must record the outcome of all checks undertaken, using the Electronic Staff Record (ESR), where available, or an alternative HR management system. These checks form part of the information governance and assurance standards linked to the use of the NHS Summary Care Record (NHS SCR). For more details, visit the Health and Social Care Information Centre: [http://systems.hscic.gov.uk](http://systems.hscic.gov.uk)
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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 satisfactory registration 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.

Minimum requirements

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.

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 of employment that the healthcare professional has registration throughout their employment. In the event that an individual’s registration is suspended, the employer should treat this as an exclusion from the work for which the registration is required and manage it accordingly.

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 (by placing conditions on their registration or erasing them from the register, for example).

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

- that the individual is registered to carry out the proposed role
- whether the individual is subject to any current on their registration that might affect the duties proposed
- if the individual's fitness to practise is being/or has been investigated and the regulatory body has a duty to disclose this information.
See Appendix 1 for further information about checking registration with professional regulatory bodies.

Qualification checks
Qualification checks are necessary to validate the information provided by an applicant in relation to their educational or professional qualifications.

Applicants may not always have the original documentation and employers will need to make an appropriate risk based assessment in relation to the priority given in the person specification to that qualification, and the level of checks required.

Where qualifications have been checked by a professional regulatory body and the individual's registration has been confirmed, then further documentary evidence about qualifications that are relevant to their registration should not be required. Accepting that registration with a professional regulatory body assumes that appropriate documentary evidence has been provided and validated by that regulator. Therefore, employers must verify that the applicant is actually the person registered with that regulatory body, that there are no restrictions to their registration, and there are no pending investigations on their fitness to practise.

For non-health professionals, qualifications that are specified as a pre-requisite for the position being applied for must be checked.

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

- request original certificates and retain a copy on file
- check that the details on certificates match the information provided by the applicant in their application form. For example, do the names, dates, course title(s) and grades match?

  It is quite possible that the name given in a qualification certificate will not match that given by the applicant due to a number of reasons, such as marriage/civil partnership, or divorce. In such cases, employers are required to obtain additional evidence to validate the change of name

- contact the awarding body directly, where possible, to confirm the applicant's attendance, course details and grade awarded. Employers will be required to provide a copy of the applicant's consent in order to obtain any such information.

It is important to ensure that sufficient time is factored into the recruitment processes to allow for a response, especially if the awarding institution is overseas, to avoid any delay in recruitment.

Where the applicant 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 that qualification. These checks should, wherever possible, be carried out directly with the awarding institution. Where this is not possible, employers 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 UK National Academic Recognition Centre (NARIC) at [www.naric.org.uk](http://www.naric.org.uk). UK NARIC is the national agency responsible for providing information on vocational, academic and professional qualifications from over 180 countries worldwide.

### 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.

On 1 April 2013, the operation of the alert notice system (including considering, issuing and revoking alerts) became the responsibility of the National Clinical Assessment Service (NCAS) which is part of the NHS Litigation Authority.

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/RecruitmentAndRetention/Employment-checks/alert-notice-system/](http://www.nhsemployers.org/RecruitmentAndRetention/Employment-checks/alert-notice-system/)

### 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

Where a check results in information being returned which contradicts the details provided by the applicant, employers should:

- proceed in a sensitive manner – there is often a reasonable explanation for apparent inconsistencies
- attempt to address any concerns directly with the applicant – calling them back for a second interview will allow time to follow up with the relevant sources.

In exceptional circumstances, where checks reveal substantial misdirection, employers may feel it appropriate to report their concerns to the local police and/or relevant regulatory body to investigate further.
Appendix 1 – Checking registration with the professional regulatory bodies

Each regulatory body has different procedures for disclosing fitness to practise information, and further information has been provided 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 at [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 of 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 16 November 2009, all doctors have been 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 in the UK, this includes where prescribing prescription-only drugs and issuing medical certificates for statutory purposes (for example death certificates). 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 and independent healthcare and in the NHS, including GPs.

Doctors who hold registration with a licence to practise are subject to the requirements under revalidation. All doctors are required to revalidate, usually every five years by
having regular appraisals, if they wish to keep their licence to practise. Revalidation has three key elements:

- to confirm that licensed doctors are practising in compliance with GMC standards (Good Medical Practice – revised in 2013)
- 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.

Employers will need to ensure that any contracts that require doctors to possess registration with the GMC comply with these requirements. Verification of a doctor’s GMC registration and licence to practise status can be obtained by:

- going to the GMC’s online register (the List of Medical Practitioners) at 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
- 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
- emailing, including the doctor’s name and GMC reference number, the employer’s name, trust and contact number, to registrationhelp@gmc-uk.org
- writing to the General Medical Council, 3 Hardman Street, Manchester, M3 3AW.

Alternatively, employers may check information held on the Electronic Staff Record (ESR) to verify their doctor’s GMC status.

Further information about registration requirements and revalidation can be found on the GMC website at 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 also issues monthly fitness to practise circulars, which include details of practitioners who have been struck off, suspended or cautioned during the previous month. The three most recent circulars are available to download from the ‘changes to the register’ page. The circulars are also incorporated into the NMC monthly newsletter for employers. To sign up, visit www.nmc-uk.org/newsletters

The NMC offers the following ways to confirm registration status:

- online at www.nmc-uk.org through the employers registration confirmation service. The service provides 24-hour access and allows an official confirmation report to be printed for each registration checked
- by telephoning for confirmation through the registration enquiries line on 0207 333 9333. Employers will need their caller code and pass number to hand
- by emailing for confirmation using bar-coded confirmation forms. For more information about this service, email UKenquiries@nmc.uk.org
- 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: UKenquiries@nmc-uk.org or Tel: 0207 333 9333
- for general overseas enquires: overseasenquiries@nmc-uk.org or tel: 0207 333 6600
- for fitness to practise enquiries: fitness.to.practise@nmc-uk.org or tel: 0207 462 5800/5801.

Health and Care Professions Council (HCPC)
The HCPC (formerly the Health Professions Council) assumed responsibility for the regulation of social workers in England, from the General Social Care Council (GSCC) which was abolished on 31 July 2012. Social workers now have to meet the HCPC standards of proficiency which are competency standards relevant to their area of practice.

The following health and care professionals are regulated by the HCPC:

- arts therapists
- biomedical scientists
- chiropodists
- hearing aid dispensers
- podiatrists
- clinical scientists
- dieticians
- occupational therapists
- operating department practitioners
- orthoptists
paramedics
physiotherapists
practitioner psychologists
prosthetists
orthotists
radiographers
social workers and
speech and language therapists.

A health and care professional’s registration status can be checked on the HCPC’s website at www.hcpc-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 HCPC’s online register, but if this is not possible, registration can also be checked:
- by phone on 0845 300 4472
- by emailing registration@hcpc-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) department either by phone on 0800 328 4218 (Monday to Friday 9am to 5pm) or by emailing ftp@hcpc-uk.org

**General Pharmaceutical Council (GPhC)**
The GPhC (formerly the Royal Pharmaceutical Society of Great Britain) provides details of pharmacists and pharmacy technicians who hold registration and details of current and recent fitness to practise inquiries.

In order to practise in Great Britain, pharmacists and pharmacy technicians must be registered with the GPhC and renew their registration on an annual basis, declaring that they meet the professional, fitness to practise and ethical standards.

Registration can be confirmed:
- online at www.pharmacyregulation.org, by entering the pharmacist’s (or pharmacy technician’s) registration number or using their name
- by phone on 020 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
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, relating to fitness to practise, investigations 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 and dated 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.

*Temporary registrants are not added to the online register, employers should contact the GDC customer advice and information team on 0845 222 4141.

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 0845 222 4141
- 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 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 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, 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:

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

Every effort is made to ensure that the requirements within these standards are updated in line with new legislation and Department of Health 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/Aboutus/Publications/workforce-bulletin/.

Employers may also access updates by downloading the free NHS Employers app which can be downloaded from iTunes and Google Play Store by typing ‘NHS Employers’ in the search bar.

Visit: www.nhsemployers.org/RecruitmentAndRetention/Employment-checks/

Email: employmentchecks@nhsemployers.org
The NHS Employers organisation is the voice of employers in the NHS, supporting them to put patients first. Our vision is to be the authoritative voice of workforce leaders, experts in HR, negotiating fairly to get the best deal for patients.

We work with employers in the NHS 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

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