



 <p>GIG CYMRU NHS WALES Iechyd Cyhoeddus Cymru Public Health Wales</p>	<p>Name of Meeting People and Organisational Development Committee</p> <p>Date of Meeting 21 October 2024</p> <p>Agenda item: 5</p>
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Registration Audit Report of Registered Healthcare Professionals employed within Public Health Wales – 2023-24	
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Approval/Scrutiny route:	PODCOM BET
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Purpose
<p>The purpose of this report is to provide assurance that Public Health Wales has an efficient and functioning system in place to monitor and verify current and active licence to practise with all employees who are registered healthcare professionals.</p>
<p>The report seeks to highlight the methodology used to conduct the audit review as well as detailed findings and recommendations for consideration.</p>

Recommendation:				
APPROVE <input type="checkbox"/>	CONSIDER <input type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input checked="" type="checkbox"/>
<p>The Committee is asked to:</p> <ul style="list-style-type: none"> • Receive assurance that a robust system is executed to ensure that all regulated healthcare professionals have the appropriate registration with their Regulatory Bodies. 				

Link to Public Health Wales [Strategic Plan](#)

Public Health Wales has an agreed strategic plan, which has identified seven strategic priorities and well-being objectives.

This report contributes to the following:

Strategic Priority/Well-being Objective	4 - Delivering excellent public health services
Strategic Priority/Well-being Objective	5 - Supporting a sustainable health and care system
Strategic Priority/Well-being Objective	Choose an item.

Summary impact analysis

Equality and Health Impact Assessment	An Equality or Health Impact Assessment is not required due to this report providing assurance only.
Risk and Assurance	There is a risk that a professional's registration will lapse, and that they will work in a post that requires registration, whilst unregistered.
Health and Social Care (Quality and Engagement) (Wales) Act	<p>This report and presentation set out the purpose of the annual registration audit and therefore directly supports the implementation of the Health and Social Care (Quality and Engagement) (Wales) Act, in relation to the Duty of Quality and Candour.</p> <p>This report supports and/or considers the 12 Health and Care Quality Standards from the Duty of Quality which means all NHS organisations have a legal responsibility to continually improve the quality of the services they provide</p>
Financial implications	Quality and improvement activity helps support our financial position, through enabling more efficient, productive services or supporting cost avoidance.
People implications	The report supports and/or considers the 12 Health and Care Quality Standards from the Duty of Quality and therefore the information is pertinent to service users, carers and staff across PHW.

1. Purpose / situation

To provide assurance to the Executive Team and Board, that arrangements are in place within Public Health Wales (PHW) to ensure all registered healthcare professionals are registered with the appropriate statutory regulatory body, an annual audit is conducted, as outlined in the Registration for Healthcare Professionals Policy¹. Historically this is completed by the Quality, Nursing & Allied Health Professionals (QNAHPs) team and this year was conducted jointly with the Office of the Medical Director (OMD).

The focus of this audit relates to healthcare professionals regulated by the following bodies:

- Nursing and Midwifery Council (NMC)
- Health and Care Professions Council (HCPC)
- General Medical Council (GMC)
- General Dental Council (GDC)

Additionally, assurance is also provided for the multi-professional public health consultant practitioners within PHW, ensuring registration on the voluntary UK Public Health Register (UKPHR) is established as a stipulated requirement of their employment.

Failure to ensure a check of a healthcare professionals' details against the appropriate register places the public, PHW, the employee and their colleagues at risk.

2. Background

PHW employs a wide range of healthcare professions nationally to support its long-term strategy of a healthier future for Wales.

In line with the Registration for Healthcare Professionals Policy, individuals are responsible for ensuring they are registered with the appropriate regulatory body and are able provide PHW with evidence of current and valid registration. Additionally, PHW also has a responsibility, as an employer, to check the professional registration of new employees and, monitor renewal registrations of existing staff.

To align all the registered healthcare professionals, this year's report includes the NMC and HCPC registrants with the addition of GMC, GDC and UKPHR registrants to provide a single collective and comprehensive audit synopsis.

A breakdown of the total number of staff audited, by registration group, are detailed below:

Registration	Number	Description
NMC	117	Nurses and Midwives
HCPC	274	Biomedical Scientists <u>Healthcare Scientists</u>
	82	• Radiographers
	21	• Clinical Scientists
	3	• Operating Department Practitioners
	20	<u>Allied Health Professionals</u>
		• 8 Physiotherapists
		• 4 Occupational Therapists
		• 2 Practitioner Psychologists
		• 2 Dietician
		• 2 Chiropodist/ Podiatrist
		• 2 Speech & Language Therapist
GMC	108	Doctors
GPC	2	Pharmacists
GDC	5	Dentists
UKPHR	34	Multi-professional consultants

A total of 666 PHW staff records were checked for assurance of professional registration. These registrants are required to hold an active registration with the appropriate regulatory body. It should be noted that several registrants were continuing to meet the required standards to maintain their registration whilst undertaking roles that did not require professional registration e.g., management, project management and quality improvement roles.

3. Methodology

The audit and assurance processes for each profession's Council were initially developed separately, primarily due to different arrangements for establishing automated live links between ESR and the profession's Council registers. Direct links into ESR were available for all regulatory professions bar UKPHR, GDC and General Pharmaceutical Council (GPC) registrants which required a full manual check.

The methodology relating to each of the professional bodies is detailed as follows:

Professional Body	Methodology Applied
HCPC	The audit reviewed posts on ESR that included titles protected by law under Article 39(1) of the Health Professions Order 2001, and cross-checking post holders with the dataset of staff monitored through the ESR/HCPC via an automated registration live-link. A total of 400 PHW staff were recorded as HCPC registrants. To determine accuracy of the data, a manual search was also carried out

	<p>on every PHW staff record in the following ESR Staff Groups:</p> <p>Additional Clinical Services Administrative & Clerical Allied Health Professions Healthcare Sciences</p> <p>The purpose of this additional methodology was due to previous audits identifying issues relating to ESR records being incorrectly created. A thorough review has been undertaken in PHW by the OMD with the Workforce Systems Manager (POD), Finance and Digital Health Care Wales (DHCW), working collaboratively to identify and rectify these issues. The findings and remedial action of this work is detailed later in the report.</p>
NMC	A check of all 117 NMC registered staff was undertaken from the details generated by the automated live link which were cross-referenced with the online NMC register. Nominated line managers were also contacted to confirm their procedure for verifying NMC registration where there were anomalies.
GMC	A check of 108 GMC registered staff within PHW through the automated live link was also cross-referenced manually which locally held data to determine and ensure accuracy.
UKPHR/GDC/GPC	34 UKPHR, five GDC and two GPC registrants were all checked manually against their respective registers due to no automated live link being available.

4. Findings/Assessment

There is a direct live link between the Electronic Staff Record (ESR) and the HCPC, NMC and GMC registers to facilitate real-time updating of professional registration status. When an expiry date is approaching, the employee and manager receive notification from ESR reminding them that registration is due for renewal at 12 months, -6 months and -4 months. The OMD and QNAHPs are also notified from ESR.

Whilst undertaking the audit it was established that the live link between ESR and HCPC will only check registration status of post holder where a post has been identified on ESR as requiring HCPC registration. If this was not undertaken when the position was first set up on ESR, automated registration checking will not take place for that specific member of staff (or groups of staff where the same ESR position number has been used).

The audit also identified a number of registered staff not engaged in clinical work, e.g., senior managers, service support roles (including training, quality, safety, etc.) and therefore some do not require a professional registration to undertake their role. It is accepted these registrants may require HCPC registration to support emergency public

health responses, whilst others are continuing to maintain their registration for career-development/ improvement purposes as well as the general desire to remain registered.

Non-standardised use of terminology within key ESR fields was identified with job roles being described in a variety of ways when essentially the roles were the same. Work is ongoing with DHCW in relation to their standardisation project however, following this audit, significant progress has been made to address some of the standardisation issues as well as being able to link directly with DHCW via our POD colleagues.

Findings relating to each professional body is detailed below:

Professional Body	Findings
HCPC	<p>Previous audits identified issues relating to ESR records being created incorrectly (e.g., incorrect job titles, codes, and position numbers). The review identified 80 records incorrectly created, resulting in 51 staff not having their automated registration check via the live link. The remaining staff were in posts expected to have a registration number attached but, in fact, were trainee posts. Immediate remedial action was undertaken on this finding with accurate registration information input into ESR.</p> <p>It is important to note that on a Wales-wide basis, DHCW are working with all Health Boards and Trusts to improve and rectify coding anomalies which will ensure all registrants are coded correctly to the appropriate job family in ESR.</p>
NMC	<p>The audit identified from ESR data there were 117 Nursing/Midwifery staff with an active NMC Registration (PIN number) employed by PHW. Analysis of these figures identified three individuals were employed as Consultants in Public Health/Communicable Disease Control but who had also decided to maintain their NMC registration. There were no adverse findings.</p> <p>Colleagues who are employed within the hosted NHS Executive have their regulation and registration linked directly with the Chief Nursing Officer (CNO).</p>
GMC	<p>The GMC registrants have an automated live link between ESR and GMC Connect. To ensure accuracy of data, all records were also checked against the All-Wales Medical Appraisal Revalidation System (MARS) and locally held data. There were no adverse findings.</p>
UKPHR/GDC/GPC	<p>Whilst multi-professional consultants join the UKPHR voluntary register, it is a condition of employment by PHW that these individuals maintain UKPHR registration. All UKPHR registrants are required to undertake professional appraisal and revalidation processes equivalent to medical and dental</p>



	<p>colleagues in order to maintain registration. The UKPHR system does not connect directly to ESR or MARS, and the OMD liaises directly on a regular basis with UKPHR to ensure revalidation dates match OMD's local data. Work has commenced with HEIW and UKPHR to establish a live link. There were no adverse findings.</p> <p>As with UKPHR, there is no automated live link in place for GDC or GPC registrants and therefore following a manual review, there were no adverse findings.</p>
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Overall, there was a 100% success rate with staff being correctly registered with their appropriate regulatory body. No adverse registration issues were identified.

Whilst ESR is a key system in the execution of the audit process, there are still some instances of incorrect creation or amendment of position numbers which could and may impact future audits. It was pleasing to note however, that DHCW are working on a project to improve the system.

There is also a small number of registered professionals that have no automated live links to any of the PHW or NHS Wales system relating to registration data. Discussions are in place with UKPHR and HEIW with the aim of rectifying this (at least for MARS).

5. Conclusion

In conclusion, full assurance can be provided to the Executive Team and Board that healthcare professional staff working within PHW are appropriately registered with their respective regulatory bodies. Where issues have been identified via this audit, collaborative working has commenced to rectify these leading to improved reporting and assurance.

6. Recommendation

To aid future audits in this area, a number of recommendations are offered:

- Continuation of collaborative working with People & OD colleagues to influence and support the work that is being undertaken by DHCW in relation to ESR updates.
- Education to Recruiting and Line Managers relating to the correct creation, usage and movement of staff via the ESR system, e.g., posts need to reflect the correct position and status of the employee.
- Continue to support and work with managers on their own local audit process as detailed in the Registration for Healthcare Professionals Policy.



- Continue working towards an accurate, robust digital system building trust and confidence in the data.

The Committee is asked to:

- **Receive assurance** that a robust system is executed to ensure that all regulated healthcare professionals have the appropriate registration with their Regulatory Bodies.

ⁱ phw.nhs.wales/about-us/policies-and-procedures/policies-and-procedures-documents/human-resources-policies/registration-for-health-professionals-policy/