



 <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 16 July 2025</p> <p>Agenda item: 9</p>
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Registration Audit Report of Registered Healthcare Professionals employed within Public Health Wales – 2024-25

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Approval/Scrutiny route:	Business Executive Team
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Purpose
<p>The purpose of this audit report is to provide assurance that all regulated professionals are up to date with their registration requirements. This includes employees directly employed by PHW, have locum/sessional commitments with PHW or are resident trainees with the School of Public Health.</p> <p>The report outlines the methodology used to conduct the audit review as well as 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 all regulated healthcare professionals in PHW have appropriate and up-to-date registration with their Regulatory Bodies during 2024/25. 				

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

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 sets out the purpose of the annual registration audit, directly supporting 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

The purpose of this audit report is to provide assurance that all regulated professionals are up to date with their registration requirements. This includes employees directly employed by PHW, have locum/sessional commitments with PHW or are resident trainees with the School of Public Health.

The report outlines the methodology used to conduct the audit review as well as findings and recommendations for consideration.

2. Background

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

To provide assurance that all regulated healthcare professionals are registered with the appropriate statutory regulatory body, an annual audit is conducted, as outlined in the Registration for Healthcare Professionals Policyⁱ. The audit is conducted jointly between the Office of the Medical Director (OMD) and Nursing Quality and Integrated Governance (NQIG).

The focus of this year's audit relates to registered healthcare professions with regulatory bodies listed below and, who are directly employed by PHW, have a locum/sessional commitment to work for PHW or are a resident trainee on either the public health, microbiology/infectious disease or virology specialty training scheme.

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

Additionally, assurance is also provided for the multi-professional public health consultants within PHW, ensuring registration on the voluntary UK Public Health Register (UKPHR) is current, as stipulated as an essential requirement of their contract of employment with PHW.

As detailed in 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 a current and valid registration. PHW also has a responsibility, as the employer, to check the professional registration of new employees and monitor renewal registrations of existing staff.

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

Registration	Number	Description
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HCPC	276	Biomedical Scientists
	84	<u>Healthcare Scientists</u>
	21	<ul style="list-style-type: none"> • Radiographers
	3	<ul style="list-style-type: none"> • Clinical Scientists
		<ul style="list-style-type: none"> • Operating Department Practitioners
	5	<u>Allied Health Professionals</u>
	4	<ul style="list-style-type: none"> • Physiotherapists
	<ul style="list-style-type: none"> • Occupational Therapists 	
	2	<ul style="list-style-type: none"> • Dietician
	1	<ul style="list-style-type: none"> • Chiropodist/ Podiatrist
NMC	108	Nurses and Midwives
GMC	64	<ul style="list-style-type: none"> • Doctors* (PHW Responsible Officer (RO))
	20	<ul style="list-style-type: none"> • Trainee/Residents (HEIW RO)
	4	<ul style="list-style-type: none"> • Doctors (Locum/sessional Health Board RO)
UKPHR	37	Multi-professional consultants
GDC	5	Dentists
GPC	3	Pharmacists
GOC	1	Optometrist

* Includes Consultants and Specialist/Associate Specialist Doctors

A total of 638 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, with most of these being within the Allied Health Professional descriptor.

3. Methodology

The audit and assurance processes for each profession's Council consists of a mix of automatic and manual checks. There are live links between ESR and some of the profession's Council registers, namely GMC, HCPC and NMC. Registrants with UKPHR, GDC, GPC and GOC required a 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 396 PHW staff were recorded as HCPC registrants. To determine accuracy of the data, a manual search

	<p>was also carried out 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 the previous audits identifying issues relating to ESR records being incorrectly created with remedial action taken to rectify and improve data accuracy. Evidence showed that the remedial action has been effective with a reduction in inaccurate data recorded.</p>
NMC	A check of all 108 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 88 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	37 UKPHR, five GDC and three GPC registrants were all checked manually against their respective registers due to no automated live link being available.

4. Findings/Assessment

The 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 remains effective, with the OMD and NQIG receiving notifications from ESR.

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. This year there was a significant reduction in anomalies in this area, enabling minimal work for the Workforce Systems team to resolve.

The audit again identified a small number of AHP registered staff, not engaged in clinical work, e.g., senior managers, service support roles that did not require professional registration. Via the introduction of a new AHP Network, it is accepted PHW should support these registrants to maintain their professional registration.

DHCW have worked with Trusts and Health Boards on an All Wales basis to address the non-standardised use of terminology within key ESR fields, in particular (Healthcare Science) resulting in the reduction of anomalies as highlighted earlier in the report.

Findings relating to each professional body is detailed below:

Professional Body	Findings
HPCPC	Previous audits identified issues relating to ESR records being created incorrectly (e.g., incorrect job titles, codes, and position numbers). The review identified there were no records incorrectly created resulting in a 100% automated registration check via the live link. A total of nine staff were in posts expected to have a registration number attached but, should be in trainee posts. Immediate remedial action was undertaken on this finding with accurate registration information input into ESR.
NMC	The audit identified from ESR data there were 108 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.
GMC	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.
UKPHR/GDC/GPC	<p>Multi-professional consultants are required to join the UKPHR voluntary register, as a condition of employment by PHW. All UKPHR registrants are required to undertake professional appraisal and revalidation processes equivalent to medical and dental colleagues to maintain registration. The UKPHR system does not connect directly to ESR or MARS, and the OMD liaises directly with UKPHR to ensure revalidation dates match OMD's local data – there were no adverse findings. PHW has agreed to work with UKPHR and HEIW on a pilot project to establish a live link with UKPHR (similar to GMC Connect) – this project is in the early stages.</p> <p>As with UKPHR, there is no automated live link in place for GDC or GPC registrants and therefore a manual review was conducted; there were no adverse findings.</p>

Overall, there was a 100% successful ascertainment of staff being correctly registered with their appropriate regulatory body. No adverse registration issues were identified.

5. Conclusion



In conclusion, full assurance can be provided to the Executive Team and Board that registered healthcare professionals employed by PHW are correctly registered with their respective regulatory bodies.

6. Recommendation

To aid future audits in this area, a few 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, ensuring an accurate, robust system.
- Education of 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.

The Committee is asked to:

- **Receive assurance** that all regulated healthcare professionals in PHW have appropriate and up-to-date registration with their Regulatory Bodies during 2024/25.

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