Statutory Health Professional Registration Procedure

1. Guiding Principles

All nurses, midwives, allied health and health science practitioners employed or contracted by WA Country Health Service (WACHS), engaged or intending to be engaged in professional practice which requires statutory registration in Australia are to demonstrate that they possess a license to practice having satisfied the requirements of the relevant statutory registration board.

Professional groups included within this procedure are identified in the WACHS Statutory Professional Registration Monitoring Policy and are governed by the Health Practitioner Regulation National Law (WA) Act 2010 referred to hereafter as the ‘National Law’.

Medical and dental officer registration details are captured through a credentialing process with a different monitoring process established, so are excluded from this procedure. Refer to WACHS Medical Credentialing and Compliance Requirement Guideline.

Nurse Practitioner and Eligible Midwife credentialing monitoring process is captured within the WACHS Credentialing for Nurse Practitioners and Eligible Midwives Policy.

A practitioner who holds multiple registrations must seek formal advice from their line manager prior to relinquishing any registration to ensure that such a decision does not affect WACHS compliance with its statutory registration responsibilities. Where a disagreement exists, the advice of the responsible Regional Executive Officer is to be sought.

In addition to the procedures outlined within this document, a manager may check at any time the registration status of an employee on the Australian Health Practitioner Regulation Agency (AHPRA) website by accessing information from either:

- Online register of practitioners
- Online renewal status check.

2. Procedure

2.1 New starter registration confirmation procedure

Where an employee is to be engaged by WACHS, a formal check of their professional registration is to be undertaken.

WACHS line managers must ensure that they confirm current registration with AHPRA via a check of the online register of practitioners prior to permitting an employee or contractor to commence work.
On receipt of New Employee Details (N2) form, HSS Employment Services initiate relevant governance checks, which include confirmation of registration currency (where identified as an essential appointment factor or selection criteria on the JDF). HSS enter registration details into the employee’s data record in HRIS.

Where the new starter is an existing WACHS employee (and therefore not required to complete an N2), the line manager is responsible for confirming current AHPRA registration online (as above) and notifying HSS of the new position registration requirement for recording in HRIS.

### 2.2 Central registration monitoring procedure

To assist managers to comply with statutory registration monitoring requirements, a WACHS central registration monitoring procedure is to be undertaken.

The data codes in Table 1 are to be used within Lattice to record the registration for specified professional groups; to obtain registration data and determine the individuals for inclusion within the central registration monitoring procedure (exclusions are identified at 2.3).

<table>
<thead>
<tr>
<th>Professional Group</th>
<th>Data Code</th>
<th>Licence Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nurse (Registered, Enrolled, Practitioner)</td>
<td>NSG</td>
<td>EN = D0201, RN and NP = D0101</td>
</tr>
<tr>
<td>Midwife</td>
<td>NSMID</td>
<td>blank</td>
</tr>
<tr>
<td>Clinical Psychologist</td>
<td>CLPSY</td>
<td>blank</td>
</tr>
<tr>
<td>Medical Imaging Technologist</td>
<td>MIT</td>
<td>REGD</td>
</tr>
<tr>
<td>Medical Radiation Technologist</td>
<td>MRT</td>
<td>REGD</td>
</tr>
<tr>
<td>Occupational Therapist</td>
<td>OCCTH</td>
<td>blank</td>
</tr>
<tr>
<td>Pharmacist</td>
<td>PHARM</td>
<td>blank</td>
</tr>
<tr>
<td>Physiotherapist</td>
<td>PHSIO</td>
<td>blank</td>
</tr>
<tr>
<td>Podiatrist</td>
<td>PODIA</td>
<td>blank</td>
</tr>
<tr>
<td>Psychologist</td>
<td>PSYCH</td>
<td>blank</td>
</tr>
<tr>
<td>Sonographer</td>
<td>SONOG</td>
<td>blank</td>
</tr>
</tbody>
</table>

A Central Office Human Resource (HR) Officer is to be designated to facilitate data extraction and centralised monitoring of registration renewals.

A Central Office Profession Officer is to be designated from each professional group, who is to be the liaison and action point between the designated HR Officer and the profession relevant Executive Officer (as per the reporting pathway identified in the [WACHS Statutory Professional Registration Monitoring Policy](#), section 2.1).
There are three (3) components to the WACHS central registration monitoring procedure:

### 2.2.1 Annual registration renewal period monitoring

Each professional group has a specified annual registration renewal period.

At the beginning of the third week of the renewal month, the monitoring cycle outlined in Appendix 1 is to be instigated. The cycle is to continue on a weekly basis until all registrations are finalised.

Where a practitioner is identified as at risk by approaching their lapse date without action, daily monitoring is to occur and a risk mitigation strategy is to be formulated.

### 2.2.2 Monthly monitoring

The monitoring cycle outlined in Appendix 1 is also undertaken during the first week of each month to capture anomalies and facilitate maintenance of registration data integrity.

### 2.2.3 Specifications monitoring

Registration authorities make available information relating to any specifications which have been applied by the registration body, that may restrict or expand a practitioner’s scope of practice. These include conditions, undertakings, reprimands, suspensions and endorsements. Regular monitoring of this data helps to ensure compliance with regulatory board conditions and ensures practitioners are working within their scope of practice.

Each Profession Officer is to determine the frequency of monitoring of specifications for their professional group, in liaison with their relevant Executive Officer and the HR Officer. The specifications monitoring procedure is outlined in Appendix 2.

All specification information is freely available to the public from the online register; however WACHS staff who access, or disseminate information relating to an employee’s registration are to observe appropriate confidentiality.

### 2.3 Exclusions from the central monitoring procedure

#### 2.3.1 Generic Health Professional roles

Health practitioners who are not identifiable in HRIS with the specifically designated professional group codes in Table 1 will not be captured via the centralised monitoring procedure.

This includes practitioners employed in multi-professional positions not specifically allocated to an individual professional group (for example, Senior Health Professional – Mental Health).
The responsibility for monitoring the registration of these individuals lies with the individual manager at a local level, to ensure that the registration category under which the employee was initially contracted as essential criteria remains current. Actions as per the flowchart in Appendix 1 are required in any situation where registration is found to be lapsed.

### 2.3.2 Contracted Health Practitioners

Health practitioners that are not entered into HRIS, such as agency staff or those not directly employed by WACHS will also not be captured in this centralised monitoring procedure. Any health practitioner who is to be working as a contracted health practitioner and not directly employed by WACHS, must provide evidence of registration upon contract commencement and ensure registration remains current for the duration of the contract. The nominated contract manager is responsible for undertaking initial online check of the AHPRA register and ongoing monitoring of registration status for all contracted health practitioners. Actions as per the flowchart in Appendix 1 are required in any situation where registration is found to be lapsed.

### 2.3.3 Recommended local monitoring process of exclusions

Managers are to identify employees and/or contractors within their line management responsibility who require statutory registration monitoring, who fit within the exclusion categories above.

A record of registration details of these individuals is to be maintained by the manager, and the annual renewal of registration date of the profession identified.

A manager is responsible for:
- maintaining the current list of individuals requiring local monitoring.
- checking the register via the method identified in the guiding principles to confirm annual registration renewal
- identifying individuals who are not registered and action as per flowchart in Appendix 1.

### 3. Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AHPRA</td>
<td>Australian Health Practitioner Regulation Agency</td>
</tr>
<tr>
<td>HSS</td>
<td>Health Service Support</td>
</tr>
<tr>
<td>HRIS</td>
<td>Human Resource Information System</td>
</tr>
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</table>
4. Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expiry Date</td>
<td>The date when a practitioner’s annual registration is due for renewal.</td>
</tr>
<tr>
<td>Grace Period</td>
<td>The month following a practitioner’s expiry date. Within the National Law, practitioners remain registered for one month after their registration expiry date before their registration lapses. If a practitioner applies to renew their registration before or within the one-month grace period, they remain registered to practise while their application is assessed and processed.</td>
</tr>
<tr>
<td>Lapse Date</td>
<td>One (1) month after a practitioner’s registration expiry date. Should a practitioner not apply to renew their registration, they will be removed from the register and may no longer lawfully practice.</td>
</tr>
<tr>
<td>Lattice</td>
<td>The human resource interface used by WACHS within HRIS. HCN are responsible for the integrity of registration data retained within HRIS.</td>
</tr>
</tbody>
</table>

5. Compliance

Failure to comply with this policy may constitute a breach of the WA Health Code of Conduct (Code). The Code is part of the Employment Policy Framework issued pursuant to section 26 of the Health Services Act 2016 (HSA) and is binding on all WACHS staff which for this purpose includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

WACHS staff are reminded that compliance with all policies is mandatory.

6. Evaluation

Monitoring of compliance with this document is to be carried out by those identified as having governance accountability for the relevant professional group in 2.1 of the associated Statutory Health Professional Registration Policy, every 12 months, by confirming that 100% of health professionals identified in HRIS as requiring a statutory license have details of their current registration recorded in their personal file.

7. Standards

- National Safety and Quality Health Care Standards - 1.10.1 and 1.10.2.
- EQuIP National Standards - 13.4.1, 13.5.1 and 13.5.2.

8. Legislation

- Health Practitioner Regulation National Law (WA) Act 2010
9. Related Policy Documents

WACHS Statutory Health Professional Registration Policy

10. Related WA Health Policies

WA Health Health Practitioners - Use of Formal Qualifications and/or professional registration as essential selection criteria. Department of Health, Government of Western Australia. Perth, WA.

11. WA Health Policy Framework

Employment Policy Framework

12. Appendices

Appendix 1: Annual Registration Renewal Period Monitoring Procedure
Appendix 2: Specifications Monitoring Procedure

This document can be made available in alternative formats on request for a person with a disability

| Contact: | Nurse Manager, Workforce Development (S. Hennessey) |
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APPENDIX 1: Annual Registration Renewal Period Monitoring Procedure

At the beginning of the third week of the renewal month, the monitoring cycle below is instigated. The cycle continues on a weekly basis until all registrations are finalised.

Nominated Central Office HR Officer:

a) Download ‘registration date’ dataset for relevant professional group from HRIS
b) Filter data by registration ‘expiry date’
c) Extract ‘expired’ registrations list
d) Access online AHPRA Employer Multiple Registration Checking Facility
e) Upload ‘expired’ registrations list to AHPRA
f) Download ‘renewed’ registration list from AHPRA
g) Filter results via ‘expiry date’ to confirm outstanding registrations
h) Enter ‘expired registrations’ data onto ‘registration exceptions’ spread sheets
i) Calculate Grace Period (1 month post expiry date) to determine ‘lapse’ date
j) Manually cross check outstanding registrations against ‘Renewal Received Confirmation’ function on the AHPRA website. If found, notation made on ‘registration exceptions’ spread sheet
k) Forward ‘Registration Exceptions’ spread sheets to nominated Profession Officer for action

Nominated Central Office Profession Officer:

a) Action as identified in the following flowchart

HSS:

a) Update registration expiry dates in HRIS

1. The National Law grants a 1 month “Grace Period” after expiry date of registration where a practitioner may still practice
2. Where registration is “In Progress” registrant may continue to work until finalised
Flowchart: Registration Monitoring Process

1. Central Office Human Resources Responsibilities
   - HR Officer downloads data
   - Check AHPRA register
   - Nominated HR Officer documents exceptions report

2. Regional Nursing and Midwifery Director
   - Confirms employee D (name change) Note: the employee must practice under the name that they are registered in.
   - Request employee to produce registration evidence

3. Evidence of current registration provided (includes "renewal in progress - may continue to work" evidence)
   - Yes
     - Notify the Regional Executive
     - Consider further escalation depending on circumstances
   - No
     - Notify the Office of the relevant Executive Director or Chief Operations Officer
     - Notify the Registration Board
     - Complete Corporate incident Process, including documentation and notification

4. Corporate & Clinical Governance Responsibilities
   - Nominated HR Officer advises HCN of updates required to HRIS system
   - Enable employee to return to clinical environment
   - Advise employee of notification to registration board and requirement to seek re-registration

5. Registration evidenced and current registration details provided.
   - Yes
   - Industrial advice sought to determine appropriate actions to be taken.
     - Individual may receive fine from registration board if worked unregistered
     - WACHS may receive fine if it allows health professional to work unregistered.
   - No
   - Withdraw employee from clinical environment
   - Seek urgent HR advice. Consider employment arrangements and leave options
   - Advise employee of notification to registration board and requirement to seek re-registration
   - Enable employee to return to clinical environment
APPENDIX 2: Specifications monitoring procedure

Nominated Central Office HR Officer:

a) Download ‘registration number’ dataset for professional group from HRIS
b) Access online AHPRA Employer Multiple Registration Checking Facility
c) Upload entire ‘registration number’ list to AHPRA
d) Download full registration dataset from AHPRA
e) Filter results via ‘registration status’ to check any suspensions or reprimands; and via ‘conditions’ to identify anyone with a conditional registration status. Identify endorsements and undertakings.
f) Enter data onto ‘registration specifications’ spread sheet
g) Forward spread sheet to nominated Profession Officer for action

Nominated Central Office Profession Officer:

a) Action data as per process determined by each professional group, in liaison with relevant Executive Officer.