
Maintaining the Covid-19 Temporary Register

Executive Summary

This paper sets out proposals and actions already undertaken to maintain the Covid-19 Temporary Register and the proposals for maintaining this register in the coming months.

Previous consideration	Covid-19 response updates – March & May 2020
Decision	Council is asked to discuss and agree the proposal set out regarding the maintenance of former registrants included on the temporary register.
Next steps	Undertake actions set out in the paper to maintain the temporary register.
Strategic aim	Strategic aim 1: To improve our performance against PSA standards of good regulation and to innovate across all our regulatory functions to provide an enhanced user experience
Risk	Strategic risk 1: failure to deliver effective regulatory functions Strategic risk 2: failure to anticipate and respond to changes in the external environment Strategic risk 3: failure to be a trusted regulator and meet stakeholder expectations
Financial and resource implications	The cost of setting up and maintaining the temporary register is £360k which is being recovered from the Department of Health and Social Care.
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1. Background

- 1.1 The Coronavirus Act 2020 enabled us to establish temporary registers for students and former registrants in March 2020. This created a pool of approximately 30,000 individuals who could practice using a protected title. Our survey of temporary registrants over the summer 2020 period showed only 10 per cent of respondents actually entered into practice and used their temporary registration¹.
- 1.2 The provisions of the Coronavirus Act 2020 are subject to review by Parliament every six months and next due to be reviewed again by the end of March 2021. The continuation of the temporary register is subject to the continuing provisions of the Coronavirus Act 2020 and the direction of the Secretary of State of Health and Social Care.
- 1.3 This paper sets out our preferred approach to maintain the temporary register for former registrants whilst it remains operational. The paper also provides an update on our previous decision to close temporary registration arrangements for students.
- 1.4 These proposals ensure we fulfil our statutory responsibilities and continue to support the response to the pandemic. The proposal also aligns with our strategic aim to close temporary registration arrangements at the appropriate time.

2. Former registrants

- 2.1 As of March 2020, individuals who had left the Register within the last three years were included automatically on the temporary register².
- 2.2 Our Fitness to Practise data shows there was only a small number (seven) of concerns raised regarding the practice of temporary registrants since their inclusion on the temporary register. On this basis, there is no indication that temporary registration rights are being used inappropriately or that there has been any risks to patient/service user safety.
- 2.3 It is important we continue to focus on maintaining the integrity and accuracy of the temporary register by ensuring only those who are appropriate, in line with our original entry requirements and overall risk appetite, remain on the temporary register.

Proposed approach for ongoing maintenance of the temporary register for former registrants

- 2.4 We propose the following criteria be applied for the ongoing maintenance of the temporary register:

¹ [Survey of the Temporary Register\(s\) | \(hcpc-uk.org\)](https://www.hcpc-uk.org/survey-of-the-temporary-register)

² 21,977 former registrants entered the temporary registrant in March 2020.

- 2.4.1 Former registrants on the temporary register who left the permanent Register more than three years ago will be removed from the temporary register, unless they confirm they have previously or are currently practising in a role related to the Covid-19 pandemic³.
- 2.4.2 The temporary register remains closed to new entrants.
- 2.4.3 Maintaining the temporary register and removing those who meet the criteria set out above would be carried out every six months whilst it remains operational. The first check is proposed for April this year.
- 2.5 This arrangement would mean, for example, that a temporary registrant who left the Register in April 2017 and had not practiced since inclusion on the temporary register would be removed.
- 2.6 We are proposing this approach because:
 - 2.6.1 there has been limited use of temporary registrants into the workforce;
 - 2.6.2 it ensures the temporary register remains representative of former registrants who continue to meet our original entry criteria (i.e those who were last on the Register within the last three years); and
 - 2.6.3 provides assurance that those who now exceed this criteria are practising, and in doing so, are required to keep their knowledge and skills current in line with our standards.

Supporting people back onto the permanent Register

- 2.7 Alongside these proposals, we continue to flexibly apply our Returners to Practice requirements⁴ to support temporary registrants interested in completing permanent registration. This includes:
 - 2.7.1 Increasing the timescales within which an applicant has completed the return to practice requirements from 12 to 24 months.
 - 2.7.2 Including practice as a temporary registrant as suitable evidence we accept as proof of 'supervised practice'.
 - 2.7.3 Being open to consider alternative forms of 'formal study' undertaken.

3. Final year students

- 3.1 The temporary register for students was closed at the end of November 2020. When we closed this register we retained 37 biomedical and clinical scientist students who indicated they were currently employed and practising on the temporary student register whilst they complete the steps towards permanent registration with us. As

³ Detail regarding hours / evidence to be provided to be considered by working group as part of maintaining the temporary register.

⁴ [Supporting former registrants during COVID-19 | \(hcpc-uk.org\)](https://www.hcpc-uk.org/supporting-former-registrants-during-covid-19)

such, we expect that temporary registration will no longer be needed for these individuals in the near future.

- 3.2 There continues to be stakeholder support in place for this action and no appetite for these arrangements to be revisited. The focus is on ensuring students continue to progress and complete their programmes. There was also limited deployment of students under these arrangements, and students are still able to work in roles which do not require temporary registrant arrangements to be in place.

4. Stakeholder views

- 4.1 These proposals were circulated with the Chief Allied Health and Scientific Officers across the four nations in December 2020. These groups indicated support and/or raised no concerns regarding these proposals and planned actions outlined in this paper.
- 4.2 We delayed implementing these proposals due to the recent COVID-19 restrictions and pressures the NHS has been under (and continues to be under) during the winter period. As we approach the first anniversary of the temporary register it is now appropriate to implement the proposals outlined in this proposal.

5. Council decision

- 5.1 The Council is asked to discuss and agree the proposals regarding the maintenance of the temporary register.