

**UKPHR Policy Statement re: lapsed, voluntary erasure and suspension or involuntary erasure of registration**

The UKPHR has established a policy both for those whose registration has lapsed, for instance, if registrants have allowed their registration to lapse when on maternity leave or working overseas etc, and those who are removed, as to how they may apply for and be granted, restoration to the register. This statement deals simply with the financial arrangements for restoration and not fitness to practise matters.

UKPHR has established a common renewal date of 1 July each year.

There are several reasons why registration may have lapsed – examples include:

- a) Those who allow their registration to lapse while on maternity leave;
- b) Those who allow their registration to lapse during a career break;
- c) Those whose registration lapses when working overseas;
- d) Retiring registrants opting for voluntary erasure

As a matter of policy, a lapse in registration will be regarded as happening by default and therefore inappropriate: any registrant who *plans* to de-register should advise the UKPHR of this intention and either temporary voluntary erasure or continuation of registration will normally be agreed, depending upon the registrant's reason for this request.

In addition, it is possible for registration to be removed, through suspension or erasure, on grounds of conduct, performance or health.

If a person simply fails to pay the annual registration fee, it is proposed that they are invited to reinstate their registration as soon as the lapse is noted. Only in the event of the registrant failing to comply with re-registration within a reasonable period, yet to be decided, will FPH be informed, if the registrant has taken up fellowship of the FPH.

**Readmission Fee:**

For people who have allowed their registration to lapse, a readmission fee will be due on their return to registration. There will be no grace period, ie the readmission fee will be payable by anyone whose registration has lapsed, on receipt of their request for readmission to the register. The readmission fee of £100 will be in addition to the annual retention fee for the current year and for any intervening years in which the lapsed registrant should have remained registered. This is in line with the policy of some other regulators.

As a direct debit facility is now available, late payments should become less common and as registrants can now access their records online to alter their contact details (only), so that change of address should not provide reason for lapse of registration.

The database automatically reads 'lapsed' once the annual retention fee date has been reached without payment being received. Different status' of registration are included in the registration database that may be publicly viewed. The categories are: current, lapsed, voluntary erasure, retired, suspended, erased. These will be reviewed regularly to ensure compatibility with other regulators.

Renewal notification letters are sent by email initially. The first notification is sent out 10-12 weeks before the expiry date (this being 30 June annually for specialists). This is followed by a second letter/email, at 6 weeks before the fee is due, where an additional paragraph is added to advise re the restoration fee and then a third letter (no email) is sent after expiry when they will be notified of the extra payment due. If they 'lapse' for 12 months then they will be required to submit documentary evidence of

- a) having kept up to date with specialist practice in public health [eg satisfactory CPD return and a PDP] and
- b) justification of the reasons for the lapse
- c) up to date reference
- d) a new application form with a signed declaration

Most will also be required to pay all back fees and the readmission fee. Consideration will be given to waive the readmission and back fees under exceptional circumstances.

#### Restoration Fee:

Those who are removed from the register through fitness to practise procedure, will, if allowed to re-register, be asked to pay a restoration fee of £100 (previously agreed fee); and will be required to pay the back fees.

#### Legitimate reasons for lapse of registration:

Lapse of registration is only justified when registration is not a requirement of employment. So, for example, working overseas is a justifiable example, as long as the person concerned does not continue to be employed by a UK-based entity which requires registration as a condition of employment. Thus, for sick leave and maternity leave, when the individual continues to be employed by an entity which requires registration, are *not* legitimate grounds for lapse of registration.

Readmission within 12 months, if agreed without the need for additional evidence, will be processed normally without a readmission fee if the reason is legitimate such as abroad for a length of time.

Such readmission will require completion of the application form for registration, completion of the Fitness for Registration declaration and will include acceptance of the Public Health Register Code of Practice.

If an individual applies for readmission after a gap of over one year in public health specialist practice, the UKPHR will have to decide in each case upon the documentation required to demonstrate fitness for practice.

Gaps in registration of more than one year is to be discouraged, since it may well be associated with loss of competency. Any registrant considering planned voluntary removal from the register other than permanent voluntary erasure should therefore be advised accordingly.

#### **Note:**

In any case of financial hardship, a registrant may request special allowance to be made in regard to payment of any of the penalty registration fees describe above. Action taken in response to such requests will be at the discretion of the Registrar.

This policy was approved by the UKPHR Executive Committee of the UKPHR Board in August 2009.