



Healthcare
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UNDER REVIEW

Independent Healthcare Regulation

Practising Privileges – Checklist for Clinics

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File Name IHC Practising Privileges Checklist for Clinics	Version: 1.0	Date: October 2020
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Introduction

'The granting of practising privileges is a well-established process within independent healthcare whereby a medical practitioner is granted permission to work in an independent hospital or clinic, in independent private practice, or within the provision of community services. Although the definition set out in the legislation refers to practising privileges only applying to medical practitioners, the concept of practising privileges has also been applied to other staff working in an independent hospital / clinic, such as a specialist nurse or therapist.' (AIHO)¹

Services should read the practising privileges key principles document on our [website](#), which provides an overview of the concept.

Independent Healthcare Legislation

The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011 states:

A provider must, having regard to the size and nature of the service, and the number and needs of service users—

- (a) ensure that at all times suitably qualified and competent persons are working in the independent health care service in such numbers as are appropriate for the health, welfare and safety of service users;
- (b) ensure that at all times a suitably qualified health care professional is working within the independent health care service whilst service users are present;
- (c) ensure that each person employed in the provision of the independent health care service receives—
 - I. regular performance reviews and appraisals;
 - II. education and training appropriate to the work they are to perform; and
 - III. suitable assistance, including time off work, for the purpose of obtaining further training and qualifications appropriate to such work;
- (d) ensure that any person working in the independent health care service who is not employed by the provider, is appropriately supervised and has undergone an appropriate induction programme while carrying out their duties; and
- (e) ensure that such steps as may be necessary are taken to address any aspect of—
 - I. a health care professional's clinical practice; or
 - II. the performance of a member of staff who is not a health care professional which is found to be unsatisfactory.

¹ Practising Privileges Principles – Key Principles, Association of Independent Healthcare Organisations, 2016

File Name IHC Practising Privileges Checklist for Clinics	Version: 1.0	Date: October 2020
Produced by: IHC Team	Page 3 of 5	Review Date: October 2022

If your service wishes to grant practising privileges to any clinician, you are responsible to make sure that all the points in the legislation are adhered to. The following checklist can be used as a prompt by services to ensure practising privileges in clinic settings are appropriate.

Checklist

The following table contains points to consider or tasks to undertake before granting practising privileges. Not all points may be applicable to all services.

Practising Privileges Checks	Yes / No / N/A
Do you have a practising privileges policy?	
Do you have a practising privileges contract / agreement in place with each clinician you are granting practising privileges to, that is signed and dated by both parties?	
Have you completed a Disclosure Scotland PVG check on each clinician?	
Have you seen / recorded proof of each clinician's identity and checked they are eligible to work in the UK?	
Have you received two references for each clinician?	
Have you seen / recorded copies of each clinician's qualifications?	
Have you seen / recorded each clinician's indemnity insurance for medical malpractice and public liability? When does it expire? How will you check it has been renewed?	
Have you seen / recorded each clinician's proof of immunisation status?	
Have you seen / recorded each clinician's annual appraisal from their substantive post? Will you undertake an annual appraisal with the clinician?	
Have you checked / recorded each clinician's professional registration status? How will you check that annually?	
What induction training will be offered to each clinician?	
What CPD training / mandatory training will be undertaken by each clinician?	

Notifications

Generally, you do not need to advise Healthcare Improvement Scotland that you have granted practising privileges to a clinician. We will ask for this information as part of your annual return.

If, however, you are registered as an individual practitioner (non-surgical), granting practising privileges will change your continuation fee. You will change from the individual rate to the staffed rate. Please submit the 'Change of staffing levels' notification to us via the eForms Portal.

Similarly, if you are registered as a non-surgical practitioner who grants practising privileges to another clinician/s but wish to revert to being an individual practitioner, please submit the 'change of staffing levels' notification to reduce your next continuation fee from the staffed rate to individual rate. For example, if you previously granted practising privileges to a prescriber to prescribe medicines for your service but have since obtained your independent / supplementary prescriber qualification and are now acting as the prescriber for your service.

Further information on the notification process can be found on our [website](#).

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File Name IHC Practising Privileges Checklist for Clinics	Version: 1.0	Date: October 2020
Produced by: IHC Team	Page 5 of 5	Review Date: October 2022