

Practitioner Performance Advice Insights

Healthcare Professional Alert Notices (HPANs): insights from nine years of managing the scheme

NHS Resolution's Practitioner Performance Advice service has a unique perspective on the use of Healthcare Professional Alert Notices (HPANs) within the NHS in England. In April 2013, we assumed administrative responsibility for the scheme from Strategic Health Authorities, with the basis for its operation set out in the National Health Service Litigation Authority (Amendment) Directions 2019.¹

In managing the HPAN scheme, Practitioner Performance Advice performs a key role in protecting patients, staff and the public from harm.

The management of the HPAN scheme, alongside many other specialist services delivered by Practitioner Performance Advice, is provided at no cost to the employer or contracting body.

This publication looks at key features from a review of all requests for an HPAN we have received since 2013, as part of our strategic commitment to share our data and insights to reduce risk and help improve the healthcare system. In sharing this information we aim to raise awareness of the importance of the HPAN scheme as a safety measure.

What are HPANs?

We issue HPANs to inform NHS bodies and other organisations providing care on behalf of the NHS about:

- a healthcare professional (a member of a profession which is regulated by a regulatory body) or
- a person holding themselves out to be a healthcare professional, who
 - poses a significant risk of harm to patients, staff or the public; and
 - may continue to work or seek additional or other work in the NHS as a healthcare professional.

Why are HPANs issued?

An HPAN is usually issued where a healthcare professional has left their employment with unresolved concerns about a potential risk they pose to others. In such circumstances the concerns should be referred to the relevant regulator by the most recent employer or contracting body.

The HPAN provides an important safeguard whilst the regulator considers whether further action is required and if so whether any interim conditions on the professional's regulation are necessary. In this intervening period the HPAN is a flag

¹ [NHS Litigation Authority \(NHS LA\) Directions](#)

to potential employers, should the healthcare practitioner seek employment elsewhere.

HPANs – responsibilities of NHS bodies

HPANs can be requested by any NHS body or organisation which provides care on behalf of the NHS. The request must be made by an Executive Board member or their authorised deputy.

When an HPAN is issued, the person who requested it is identified as the point of contact for potential employers. They are expected to share concerns regarding the healthcare practitioner, should they try to seek employment.

In line with guidance from [NHS Employers](#), when recruiting registered healthcare professionals, employers must check that there is no known information held about them on the HPAN system. These pre-employment checks must be completed by NHS bodies or any other organisations which provide services to the NHS. Checks can be completed via a web-check service or by contacting Practitioner Performance Advice [directly](#).

Further details on how to request an HPAN and to check whether an individual is the subject of an HPAN can be found on our [website](#).

HPANs – responsibilities of Practitioner Performance Advice

When considering HPAN requests, we will carefully consider the balance between ensuring patients, staff and the public are protected from harm, whilst at the same time ensuring the healthcare professional is treated fairly.

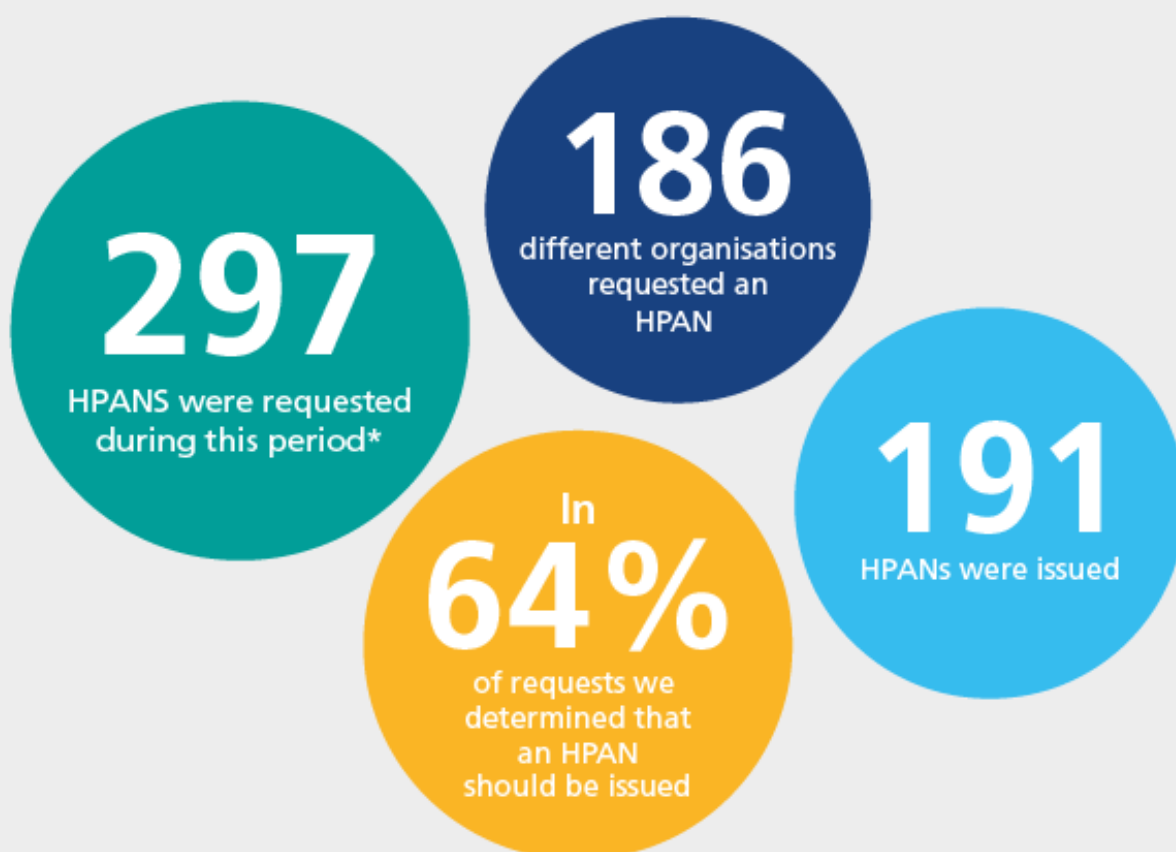
When a decision is made to issue an HPAN we will communicate this to the NHS or other body requesting it and the healthcare practitioner who is subject to it. We will also inform:

- NHS England's National, Regional and Area Team Medical Directors.
- Chief Medical Officers in Northern Ireland, Wales and Scotland.
- The relevant regulatory body.

It may also be shared with any other NHS body, or organisation which provides services to an NHS body, which we believe may be approached by the healthcare practitioner to seek employment.

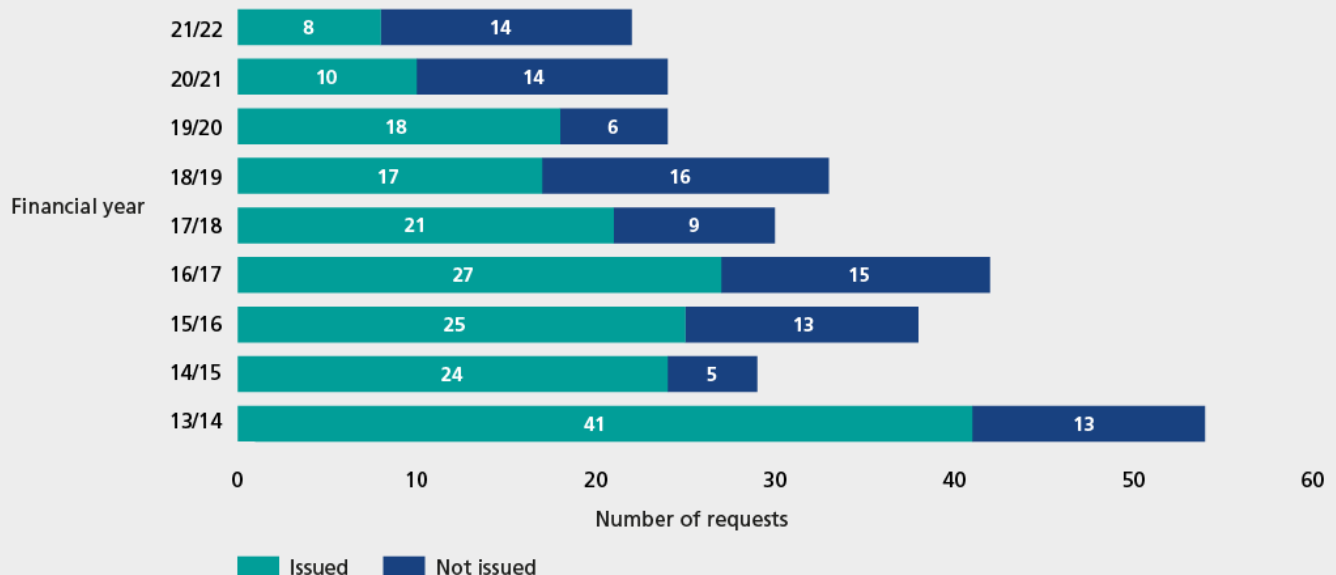
To ensure an HPAN is not kept in place any longer than required, we review issued HPANs every three months, or sooner if new information comes to light. Where the regulator places conditions on the healthcare professional's status on the register, we will revoke the HPAN. Similarly if the regulator has reviewed the more extensive information available to them in relation to the healthcare practitioner and does not feel any conditions are necessary, we will also consider revoking the HPAN.

Key findings from nine years of administering the HPAN system (April 2013 to March 2022)

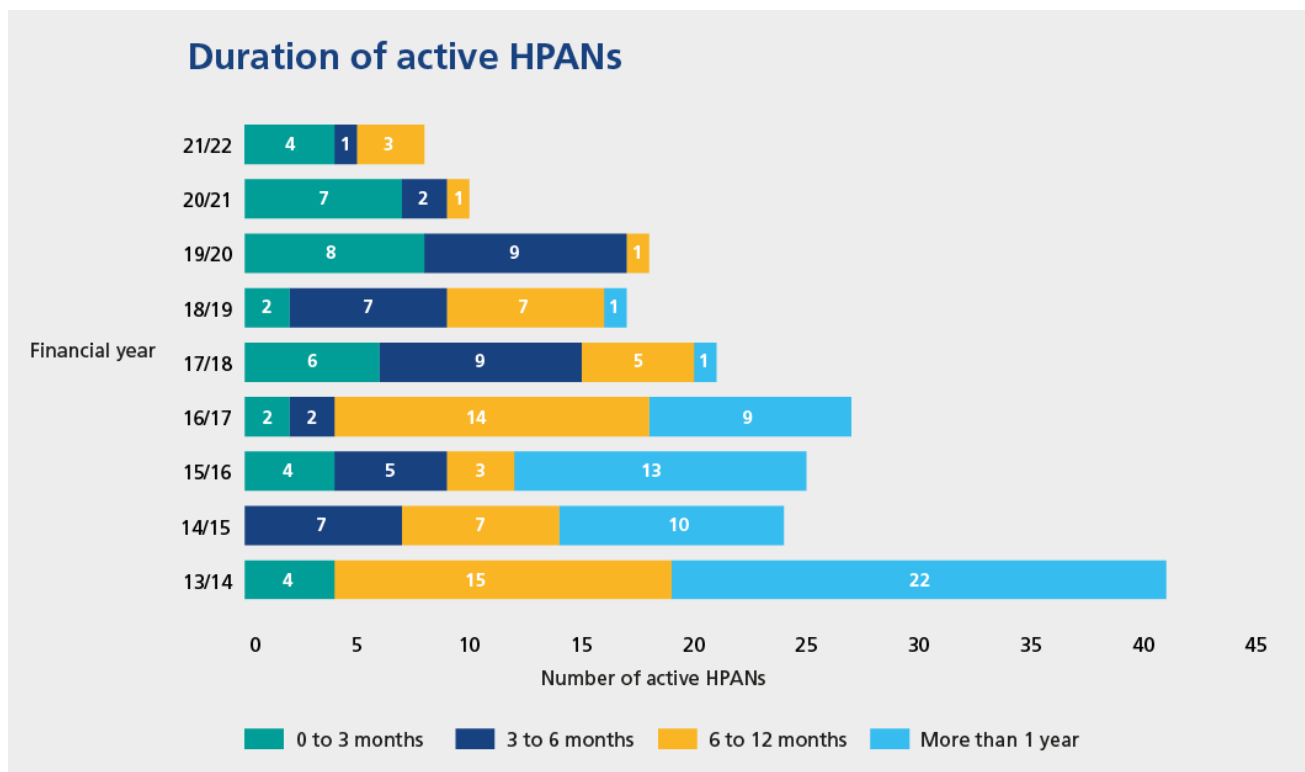


*These related to 292 different individuals (with more than one request received in relation to five individuals)

Number of HPANs requested by financial year with a breakdown of issued/not issued

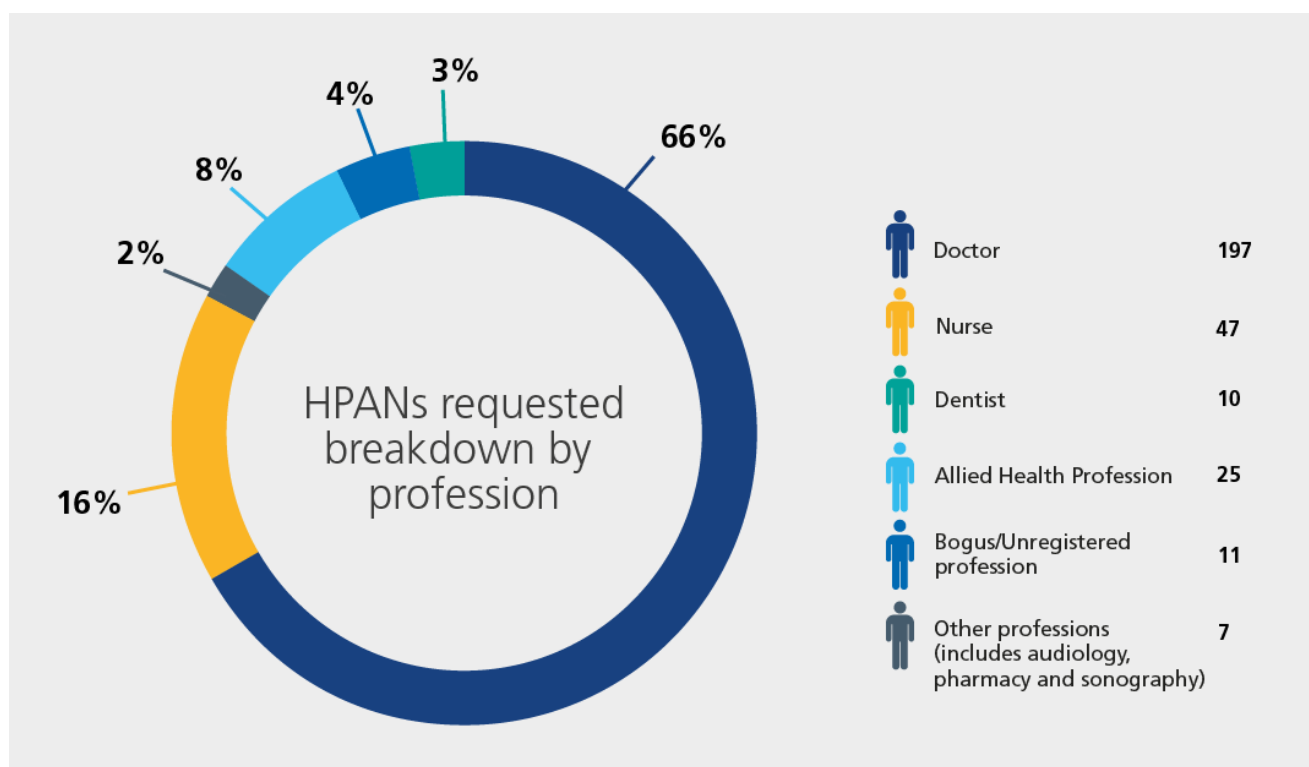


A total of 297 HPAN requests have been received from 186 different organisations since April 2013. In 64% of requests received during the nine year period we determined that an HPAN should be issued. The number of HPAN requests received per financial year has halved since April 2013.

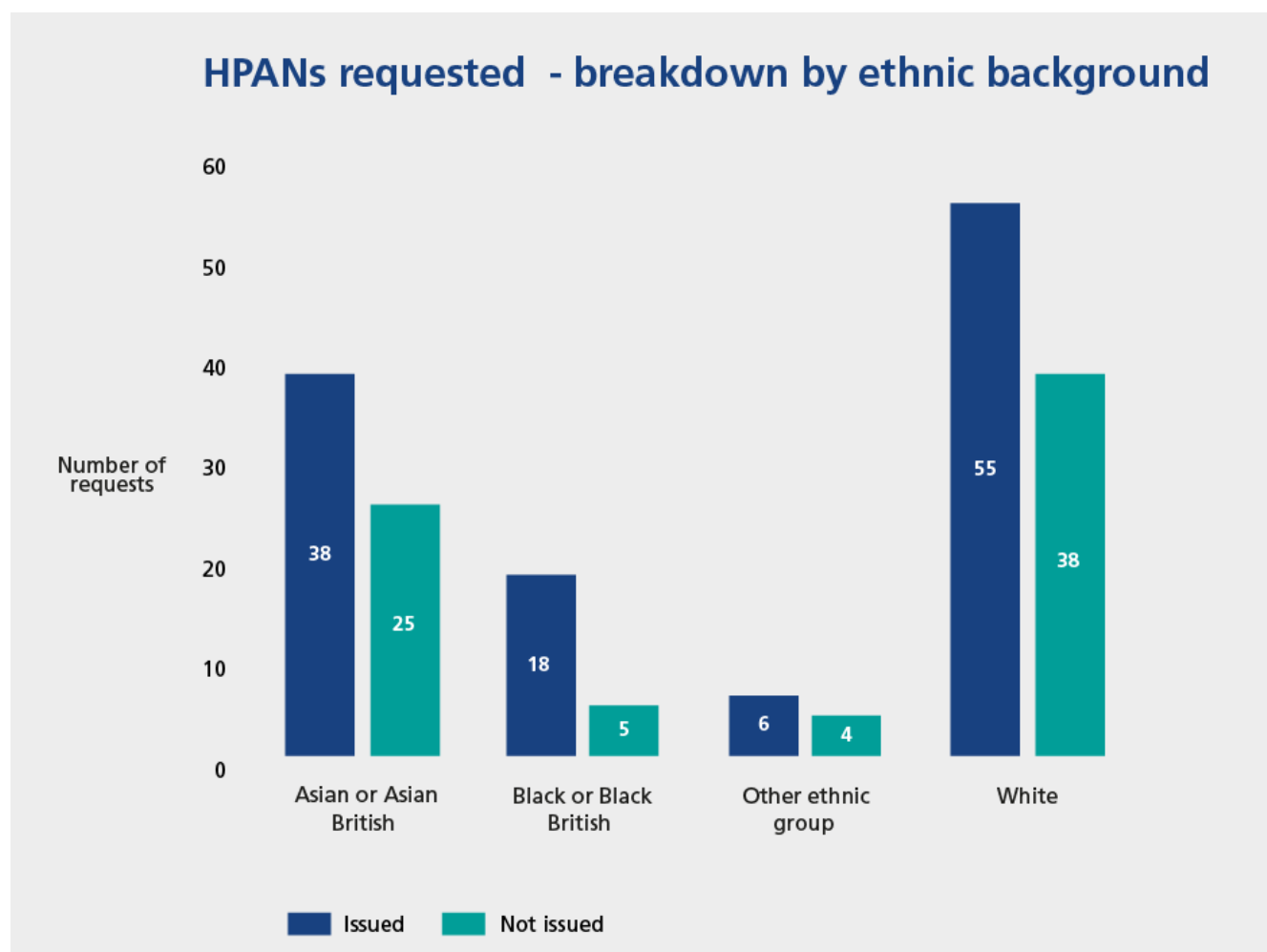


The duration of active HPANs has reduced since April 2013, with no HPAN issued in the past three years exceeding one year in duration. From our experience of managing the scheme for the past nine years, regulators have enhanced the responsiveness of their processes and this has likely contributed to the demonstrable reduction in duration of HPANs.

Characteristics



Doctors account for 66% of the total 297 HPANs requested since April 2013. The next highest profession for which requests are received is nursing, which represents 16% of all HPAN requests.



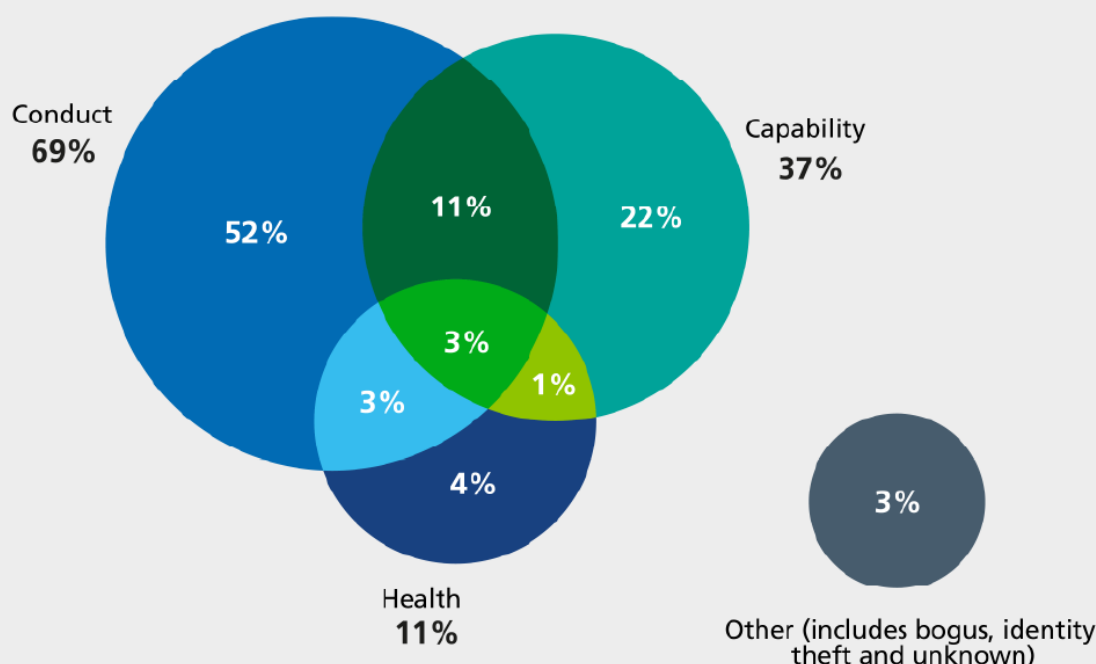
Where information on gender is known to us, male individuals represent 76% of the total number of requests for HPANs with three quarters of these requests approved.

Where the ethnic background of individuals is known to us, the proportion of HPANs requested and issued is fairly evenly split. For the total number of HPANs where information about ethnic background is known to us, professionals from ethnic minority groups account for 51% of all requests and 53% of those issued in total.

The largest number of HPAN requests are received in respect of doctors. According to the most recently published NHS workforce data (dated June 2022), where ethnicity is known, 50% of doctors working in the NHS are from an ethnic minority group. For the total number of HPANs in respect of doctors, where information about ethnic background is known by us, 47% relate to individuals from ethnic minority groups, with 49% of these requests leading to an issued HPAN.

For the total number of HPAN requests where the practitioner's place of qualification is known to us, those who qualified outside the UK account for 69% of requests. In over a third of these requests we determined that an HPAN should be issued.

HPANs requested - breakdown of reported concerns



Due to significant overlap in the reported concerns, the totals add up to over 100%

The proportion of concerns leading to an HPAN request is similar to that which feature in [requests to our Advice service](#). Concerns about conduct are the main reason for requesting an HPAN, with 69% of requests involving concerns relating to this area. Capability is the second highest area of concern and features in 37% of all requests.

HPANs - how can Practitioner Performance Advice help?

- Our team of experienced advisers can offer support and advice to both employers and those involved in the performance management of practitioners, who are considering requesting an HPAN.
- Our educational programmes include case studies that allow participants to explore good practice when considering an HPAN.
- We will be including information on HPANs in our Organisational Activity Reports.²
- Our [website](#) contains useful resources, including an explanatory video detailing the purpose of HPANs and the request process.

² We are developing this service as a means of sharing, with individual NHS organisations, key data we hold on cases on which we have advised them. The purpose is to help organisations to understand the profile of those cases and to review their engagement with us, including use of the HPAN scheme. This service will initially be delivered to acute trusts in England.

Our *Insights* publications share analysis and research which draw on our in-depth experience providing expert, impartial advice and interventions to healthcare organisations. By sharing these insights, we aim to support the healthcare system to better understand, manage and resolve concerns about doctors, dentists or pharmacists. You can find all past *Insights* publications [here](#).

If you are interested in hearing more about our research and evaluation *Insights* work, please get in touch with us nhsr.adviceresearchandevaluation@nhs.net.

If your organisation does not already have access to this web service (for Performers Lists Checks) and you wish to use it, we will require details of one person per organisation who, in addition to completing checks, will act as local administrator with rights to grant system access to colleagues. We require their name, position, organisation, email address and telephone number. Please send these details to nhsr.appeals@nhs.net

If you'd like to learn more about our work and the services we offer, please visit our dedicated [Practitioner Performance Advice webpages](#). Our Education service offers [training courses](#) to provide healthcare organisations with the knowledge and skills to identify and manage performance concerns locally.