REGISTRATION COMMITTEE

HPC Policy on Addresses for Registrants

From : the Executive

FOR DISCUSSION

DECISION PAPER: HPC POLICY ON ADDRESSES FOR REGISTRANTS

BACKGROUND
At present, registrants provide the HPC with a single address that is entered onto the existing CPSM Registration System. This *registered address* is the address that is displayed to the public (the *publicly displayed address**) and is also the address to which all HPC correspondence is sent (the *correspondence address*).

The Council is obliged to have a *publicly displayed address** for every registrant, and this will continue be the case once the LISA Registration System comes into effect.

However, at present, the registrant is able to decide whether to provide the HPC with their *work address* or their *home address*. Therefore, the HPC has a list of *registered addresses* that are a mix of *work* and *home addresses*, but are predominantly *work addresses*. This system was put in place by CPSM, due to registrants' concern that they did not want their *publicly displayed* address* to be their *home address*, to protect them from the possibility of being tracked down at home.

However, registrants generally change jobs more frequently than homes. With large numbers of registrants providing the Council with their *work address* as their *registered address*, there are some unfortunate "knock-on" effects for the HPC:

Correspondence is not always received by registrants – A large number of returns come back to HPC from registrants' *work addresses*.

Less than ideal service for registrants – Internal resources must be diverted to process these correspondence returns.

A risk to public protection – HPC cannot guarantee that it has a registrant's current *home address*, as the CPSM Registration System did not require this to be held. This is a potential problem if HPC is required to carry out judicial or legal proceedings against a registrant and cannot locate the registrant.

THE FUTURE
The power of the technology used to support the new LISA Registration System is sufficient to store many addresses for each registrant. Potentially, therefore, it is possible to store a separate *publicly displayed address** and *correspondence address* for each registrant. This would be highly desirable, as it would mean that these two addresses could be different.

In particular, registrants could provide their *work address* as their *publicly displayed address* **and their *home address* as their *correspondence address*.**

This would meet their concerns about protection of privacy while substantially reducing the problems associated with unread correspondence that the Council currently experiences. Legal advice is that, under this system, registrants' *home addresses* would be their *registered addresses* as well as their *correspondence addresses*.

However, even if this system were to be implemented, there would potentially continue to be a problem with returned correspondence due to changes of address. Therefore, it is recommended that an explicit obligation is put on registrants to:
- Provide a *home address* which will be used by Council as the *registered* and *correspondence address*, but will not be made publicly available
- Provide a *work address* which will be used by Council as *publicly displayed address**, which members of the public can view to determine whether a particular registrant practises in their locale
- Update the Council within XX days of a change in either their *home address* or *work address*

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* The *publicly displayed address* supplied by registrants will be displayed to members of the public in the format described on page 12 of the Key Decisions document. That is, the approximate geographical area in which a registrant practises

In fact, as the registration system is sufficiently powerful, it is recommended that when a registrant notifies the Council of a change of address (whether *home* or *work*), the previous address is kept as an archive and not simply discarded. This increases the ability of the Council to track down a registrant when necessary.

This was discussed and agreed in the Registration Committee meeting on Tuesday 12 November 2002.

RECOMMENDATIONS
The Executive recommends that the Council adapts the policy that:
"Registrants will be obliged to:
- Provide a *home address* which will be used by Council as the *registered* and *correspondence address*, but will not be made publicly available
- Provide a *work address* which will be used by Council as *publicly displayed address**, which members of the public can view to determine whether a particular registrant practises in their locale
- Update the Council within XX days of a change in either their *home address* or *work address*"

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