



West Hampshire
Clinical Commissioning Group

REGISTRATION AUTHORITY POLICY

Version 4.1

Subject and version number of document:	Registration Authority Policy
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Author:	CSU IT Services / WHCCG Governance Manager
CCG owner:	Senior Information Risk Owner
Links to other policies:	CCG Smartcard Management Process
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For action by:	All Staff
Policy statement:	The CSU Registration Authority (RA) is responsible for verifying the identity of health care professionals and workers who wish to register to use National NHS services including GP clinical systems, pharmacy systems, Choose and Book, the electronic Prescription (EPOS), Secondary Use Service (SUS), Map of Medicine (MoM), Summary Care Record (SCR). This policy details the roles and responsibilities of the RA in issuing and monitoring the use of Smartcards to access these systems.
Responsibility for dissemination to new staff:	Line managers at induction.
Mechanisms for dissemination:	All new and revised policies are promoted through the staff newsletter and intranet, and published on the CCG website.
Training implications:	All staff should be made aware of where to find CCG policies at induction.
Resource implications	There are no resource implications in relation to this policy.
Further details and additional copies available from:	Website: https://westhampshireccg.nhs.uk/document-tag/ig-and-security-policies/
Equality analysis completed?	This policy has been assessed as having a low impact on people with characteristics protected by the Equality Act. As such a full equality impact assessment is not required.
Consultation process	CCG RA Sponsor CCG Policy Sub Group
Approved by:	Policy Sub Group
Date approved:	11 September 2019

Website Upload:

Website	Location in FOI Publication Scheme	https://westhampshireccg.nhs.uk/document-tag/ig-and-security-policies/
Keywords:	<i>Insert helpful keywords (metadata) that will be used to search for this document on the intranet and website</i>	

Amendments Summary:

Amend No	Issued	Page(s)	Subject	Action Date
1	Sept 16		Re-badged as CCG policy and to reflect that the CCG now has an identified RA Sponsor.	Sept 16
2	Aug 17	13	Updated Smartcard management process	August 17
3	Jan 18	Cover	Extend review date to 25 May 2018 when GDPR effective	Jan 18
4	Mar 18	Appendix	Smartcard Management Process updated	Mar 18
5	Oct 18	9 to 11, add pgs 15 onwards	Update location of CHC team, new section 6, updated sections 7 and 8, section 10 deleted and addition of appendix B.	Oct 18
6	Mar 19	7, 9-11.	Addition of definitions and update to training and monitoring arrangements.	Mar 19
7	Aug 19		Full review. No amendments to content. Amend policy review from annual to biennial. Version control brought in line with CSU policy. Removal of appendix B as CSU internal process.	Aug 19

Review Log:

Include details of when the document was last reviewed:

Version Number	Review Date	Reviewer	Ratification Process	Notes
1.1	Sept 16	CSU IT and CCG Policy Administrator	As detailed above.	
2	Oct 18	CSU RA and CCG Policy Administrator		See amend 5 above
2.01	Mar 19	CSU IT / RA and CCG Policy Administrator	Policy Sub Group	See amend 6 above
4.01	Aug 19	As above	CSU IT Exec Leadership, IG Steering Group, Corporate Governance Assurance Group. CCG Policy Sub Group.	See amend 7 above.

REGISTRATION AUTHORITY POLICY

SUMMARY OF KEY POINTS TO NOTE

The South, Central & West Commissioning Support Unit (SCW CSU) Registration Authority (RA) is responsible for verifying the identity of health care professionals and workers who wish to register to use National NHS services including GP clinical systems, pharmacy systems, Choose and Book, the electronic Prescription (EPOS), Secondary Use Service (SUS), Map of Medicine (MoM), Summary Care Record (SCR). This policy details the roles and responsibilities of the RA in issuing and monitoring the use of Smartcards to access these systems.

- All users issued with a Smartcard must comply with the guidance in the [RA Operating Guidance](#)
- The CCG Business Manager, Omega House and the Senior Administrator, Continuing Healthcare at Fareham Civic Offices act as RA Sponsors for the CCG and should be contacted for any queries in relation to the issue and management of Smartcards.
- The CCG has its own internal process for the management of Smartcards, which is appended to this policy for information.

REGISTRATION AUTHORITY POLICY

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REGISTRATION AUTHORITY POLICY

1. INTRODUCTION AND PURPOSE

- 1.1 The purpose of this policy is to provide guidance to all staff on Registration Authority (RA) issues. The NHS Care Records Service (NHS CRS) and related National Programmes use a common approach to protect the security and confidentiality of every patient's personal and health care details.
- 1.2 It is essential everyone who is given access to patient information has been through the same rigorous identity checks.
- 1.3 The NHS has set out the principles that govern how patient information is held in the NHS CRS and the way it is shared.
- 1.4 Users require a Smartcard to access the national applications linked to the NHS Spine, for example Electronic Staff Records, Choose and Book, Summary Care Records, Electronic prescriptions and the issuance of Smartcards to access these systems is governed by the Registration Authority process.

2. SCOPE AND DEFINITIONS

Scope

- 2.1 It is the responsibility of all staff including those on temporary or honorary contracts, agency staff and students to comply with this policy, and associated [RA Operating Guidance](#) procedures.
- 2.2 This policy applies to those members of staff directly employed by the CCG and for whom the CCG has legal responsibility. For those staff covered by a letter of authority/honorary contract or work experience, the organisation's policies are also applicable whilst undertaking duties for or on behalf of the CCG.

Definitions

- 2.3 **Smartcard:** NHS smartcards are similar to CHIP and PIN bank cards, they enable healthcare professionals to access clinical and personal information appropriate to their role.
- 2.4 **A Registration Authority:** Is a function, usually within an NHS organisation, that carries out the identity checks of prospective smartcard users and assigns an appropriate access profile to the health professional's role as approved by the employing organisation.
- 2.5 **Care Identity Service:** Registration authorities use the Care Identity Service (CIS) to control NHS smartcard access for the NHS Spine's 800,000+ smartcard users. It is a unified application that provides a single location for all registration authority activities.

3. ROLES AND RESPONSIBILITIES

3.1 Registration Authority

The South Central and West Commissioning Support Unit (SCW CSU) Registration Authority will:

- 3.1.1. Produce quarterly reports.
- 3.1.2. Identify how RA services are delivered (e.g. partner with other organisations to provide RA services etc) and the nature of the service delivery (which sites, what hours, etc). This will include provision of RA services to non-NHS organisations where appropriate.
- 3.1.3. Identify to the IT senior management team, for approval, any proposed agreement with another organisation to provide RA services (this includes other NHS and non-NHS organisations).
- 3.1.4. Develop the procedure guidelines for the issuing of Smartcards by the SCW Registration Authority through the CCG's designated RA Sponsors.
- 3.1.5. Ensure the necessary support functions are in place and are aligned with the needs of the RA including training, IT, HR and RA support.
- 3.1.6. Ensure the national policies and procedures for RA are considered when developing the CCG's information governance (IG) framework in conjunction with the CSU IG team.
- 3.1.7. Ensure a biannual review of the RA policy and procedures is undertaken and updated as required.
- 3.1.8. Establish and update the incident and risk management register and report on this on an annual basis to the SCW Board.

3.2 SCW CSU RA Manager Responsibilities

- 3.2.1 The SCW CSU RA managers will be responsible for ensuring the adherence to policy and governance related to the RA, for the efficient day-to-day operation and capacity planning of the RA services.

3.3 SCW CSU RA Agent Responsibilities

- 3.3.1 The RA agent(s) will be responsible for ensuring RA services are delivered in accordance with the RA procedures and governance to users of RA services.

3.4 CCG RA Sponsor Responsibilities

- 3.4.1 The RA sponsors for the CCG are the business manager in Omega House and the senior administrator, Continuing Healthcare at Fareham Civic Offices.

- 3.4.2 The RA sponsors will be responsible for approving the registration and access profiles granted to users. Additionally, they may be responsible for passcode resetting and vouching for the identity of users – all subject to the RA procedures and governance.
- 3.4.3 The CCG has its own smartcard management process for the issue/return of smartcards within the CCG (see Appendix A), which links to the SCW CSU RA procedures.

4. ACCOUNTABILITY

- 4.1 Overall accountability for policy documents across the organisation lies with the Chief Officer who has responsibility for meeting all statutory requirements and adhering to guidance issued in respect of policy documents.
- 4.2 Overall responsibility for the Registration Authority Policy lies with the SCW CSU Registration Authority managers who have delegated responsibility for managing the development and implementation of Registration Authority policy and procedural documents.
- 4.3 All NHS employees, contractors and other staff who have been issued with Smartcards for use in their work with the NHS are responsible for their Smartcards and must abide by all current terms and conditions of use.
- 4.4 Failure to adhere to National RA Policy and guidance may lead to revocation of the Smartcard and / or disciplinary procedures.
- 4.5 The principles of the Registration Authority procedures are to ensure that:
- All Smartcards are issued in accordance with the relevant procedures
 - All Users issued with a Smartcard are made aware of their roles and responsibilities for the use of that Smartcard and comply with those requirements
 - All Users comply with the guidance in the RA Operating Guidance
 - SCW CSU Audit of Smartcard use is carried out in accordance with the RA Operating Guidance in conjunction with customer organisations.

5. TRAINING

- 5.1 The SCW CSU Registration Authority team will ensure training opportunities are provided in the use of the Care Identity System and application of this policy and underpinning processes, procedures and standards.

6. EQUALITY ANALYSIS

- 6.1 The CCG is committed to equality, diversity and inclusion for all, as well as to meeting the Public Sector Equality Duty (Equality Act 2010).

- 6.2 Both new policies, and existing policies when reviewed, come within the Public Sector Equality Duty. This means that policy authors must consider whether the policy will be effective for all patients and / or staff. This process is called equality impact assessment.
- 6.3 This policy has been assessed as having a low impact on people with characteristics protected by the Equality Act. As such a full equality impact assessment is not required.

7. SUCCESS CRITERIA / MONITORING THE EFFECTIVENESS OF THE POLICY

- 7.1. Performance against key performance indicators will be reviewed on an annual basis by the RA and used to inform the development of future policy and procedural documents.
- 7.2. The CCG Business Manager based at Omega House retains a list of all smartcards that have been issued to CCG staff. This will be reviewed / audited on a biannual basis against the Active User Report provided by the RA, and on an annual basis against directorate asset registers to ensure they align. Any discrepancies will be followed up as appropriate.

8. REVIEW

- 8.1 This policy will be reviewed on a biennial basis by SCW CSU IT Services senior leadership team and in accordance with the following, as and when required:
- Legislative changes
 - NHS good practice guidance
 - Significant incidents reported
 - Changes to organisational infrastructure
 - Changes to National Registration Authority Policy

9. REFERENCES AND LINKS TO OTHER POLICIES

National Registration Authority Policy can be found here:

<https://digital.nhs.uk/services/registration-authorities-and-smartcards#registration-authorities>

APPENDIX A CCG SMARTCARD MANAGEMENT PROCESS

New employee / smartcard user

1. Line manager to complete the standard form for Registration of a New User Annex A) and email to the Registration Authority Sponsor (RA Sponsor):

Sponsor 1

CCG Business Manager
Omega House
112 Southampton Road
Eastleigh
Hampshire SO50 5PB

Email: whccg.admin@nhs.net

The CCG has approved a 2nd sponsor to ensure business continuity and reduce risk:

Sponsor 2

Senior Administrator
Continuing Healthcare (CHC)
West Hampshire CCG
5th Floor, Civic Offices
Civic Way
Fareham
Hampshire PO16 7AZ

Email: whccg.admin@nhs.net

2. Individuals will be required to arrange to visit the RA Sponsor at Omega House or CHC and provide photographic proof of identity with driving licence or passport. A proof of address in the form of one utility bill will also be required. The RA Sponsor will enter information as required into the RA system and a photograph will be taken for the smartcard.
3. If a new starter already has a smartcard issued by a previous NHS organisation, the line manager is to inform the RA Sponsor of new access rights: this will need to be done by email for audit purposes. Depending on circumstances, for example if the smartcard had been deactivated for some time, the individual may need to meet the RA Sponsor to provide proof of identify. The RA Sponsor will be able to advise.
4. On first use of the smartcard, the user will be required to complete a declaration on the NHS Spine system, confirming that they will abide by the terms and conditions of use.

5. The master register for the CCG will be updated and maintained by the CCG Business Manager. The Senior Administrator (CHC) will keep a CHC register and this will feed into the CCG master register.

Expired / locked cards

1. If a smartcard certificate has expired (every two years) or a card gets locked, users should present themselves to the RA Sponsor; the CCG Business Manager at Omega House or the Senior Administrator at CHC in order for the card to be updated and to re-set the password.

Long Term Sick / Maternity Leave

1. If a member of staff is on long term sick or maternity leave, the RA sponsor should be informed so that access rights are suspended. The smartcard will be retained by the user and reactivated upon return from sick / maternity leave.

Changes to smartcard users / access rights

1. Line managers to inform RA Sponsor of any leavers / changes in details / changes to access rights.
2. Where there is a change of name, the individual will need to arrange to meet with the RA Sponsor and provide documentary evidence, such as a marriage certificate.
3. If the individual is moving to another NHS organisation / department, they should keep their smartcard. However, the line manager should contact the RA Sponsor to ensure their current role is deactivated. The new organisation / department will then arrange for the card to be reactivated as appropriate.
4. If the individual is leaving and not moving on to another NHS organisation, the smartcard should be returned to the line manager on the last working day. The line manager should then ensure the card is returned to the RA Sponsor who will ensure the card is destroyed in line with HSCIC guidelines.
5. The master register for the CCG will be updated and maintained by the CCG Business Manager. The Senior Administrator (CHC) will keep a CHC register and this will feed into the CCG master register.

Please refer to the Information Governance Staff Handbook for further details of responsibilities for line managers, staff and data custodians / information asset administrators.

CIS – Request Creation of New User

(Sponsor Use Only)

- The information in this form must be entered in the Care Identity Service (CIS) in the event CIS is not being used to request the registration of a new Smartcard User.
- All mandatory fields must be completed to complete this process.

Please complete the following fields in BLOCK CAPITALS:

Applicant Details		(Please complete all fields as fully as possible)
Title (e.g. Dr, Mr, Mrs etc.):		
Given Name (Forename):	(Mandatory)	
Middle Names:		
Family Name:	(Mandatory)	
Preferred name:		
Previous family names:		
Applicant Contact Details		(Please complete all fields as fully as possible)
Telephone number:		
Mobile number:		
Email:		
Applicant Organisation		
Organisation name:		
Applicant Workplace Details		(Please complete all fields as fully as possible)
Workplace name:		
Workplace department:		
Workplace address:	(Including Postcode)	

Sponsor's declaration (To be entered in the Notes field in CIS when entered by RA)

I confirm that the **Applicant** specified above should be issued a Smartcard.

Sponsor Name	
Sponsor UUID	
Date	

Once completed in full please email (or post) the completed form to your local Registration Authority.

