Policy Reference – POL009

Wirral Clinical Commissioning Group

Joint Primary Care Registration Authority Policy and Procedure

Version	**1.0**
Ratified By	**Wirral CCG Committee which includes Information Governance in the Terms of Reference**
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Policy Reference – POL009

This policy covers the following organisations:

- NHS Wirral Clinical Commissioning Group

Further information about this document:

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Contact(s) for further information about this document	**Mark Bakewell** **Chief Finance Officer**
This document should be read in conjunction with	**All other ICT Service policies**
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Version Control:

Version History:		
Version Number	**Reviewing Committee / Officer**	**Date**
1.0		

1. Scope

This policy covers the Registration Authority for organisations supported by Cheshire ICT Service including the following:

- NHS West Cheshire Clinical Commissioning Group
- NHS Eastern Cheshire Clinical Commissioning Group
- NHS Warrington Clinical Commissioning Group
- NHS Vale Royal Clinical Commissioning Group
- NHS South Cheshire Clinical Commissioning Group
- Wirral Clinical Commissioning Group

2. Introduction

2.1 Overview

The NHS Care Records Service (NCRS) and related National Programme for Information Technology (NPfIT) services are accessed using an NCRS Smartcard. A Smartcard is a 'chip and pin' device used as a means of securely identifying a user.

For healthcare professionals to be issued with a Smartcard they must be registered through the Registration Authority. Smartcard registration and access is controlled by the Registration Authority. To register for a Smartcard, Registration Authorities are required to ask applicants for identification which satisfies the government recommended standard 'e-Gif Level 3', providing at least three forms of identification (photo and non-photo), including proof of address. Full details can be found at http://www.govtalk.gov.uk.

All National Programme for IT applications use a common security and confidentiality approach, which is also shared by various local applications. This is based on the user being assigned roles, areas of work, activities and work groups. Access is defined and authorised by the Sponsor of the user. The Sponsor would usually be the user's line manager or a senior member of staff with a direct working relationship with the user.

This document lays out the policy and procedure for Smartcard registration access control for Cheshire Information and Communication Technology (ICT) Service and its primary care stakeholder organisations.

2.2 User Identity Manager and Integrated Identity Management

User Identity Manager (UIM) is new registration software to manage NHS CRS access control and facilitate the Interface to the Electronic Staff Record (ESR). UIM uses electronic forms and digital signatures thereby removing the need for paper based workflow. The implementation of UIM requires no data to be migrated. Access control in UIM is facilitated using NHS CRS Access Control Positions (ACP) defined by the Position Based Access Control Methodology which is therefore a pre-requisite to its implementation.

Integrated Identity Management is an initiative that has been introduced by Connecting for Health to join up registration authority and human resources processes. To support this there is an option to link UIM to the Electronic Staff Record (ESR) and manage smartcard access via an ESR/UIM interface.

For Clinical Commissioning Groups it has been decided that the most effective way to manage smartcard access is currently UIM standalone.

Wirral CCG are in the process of implementing UIM, and practices currently use the pre-existing Registration Authority forms for smartcard authorisation. The UIM implementation is expected to be complete by July 2013. Until UIM completion the paper forms and processes will be used in line with the national framework.

3. Registration Authority Personnel

The Registration Authority personnel mentioned in this document and their basic responsibilities are:

- **Registration Authority Manager** – Manages the overall Registration Authority procedure in consultation with the Information Governance Teams of each stakeholder organisation. The Registration Authority Manager is responsible for setting up all policies and procedures concerning the Registration Authority. The Registration Authority Manager is responsible for meeting all requirements laid out in this document and the Registration Authorities Operational Process. The Registration Authority Manager is responsible for uploading UIM Access Positions in accordance with the processes laid out in this document.

- **Registration Authority Agent** – Registers new users, issues Smartcards, maintains and updates existing users' access. The Registration Authority Agent is responsible for carrying out Smartcard Registrations, change requests and Smartcard revocations in accordance with this document and the Registration Authorities Operational Guidance.

- **Registration Authority Sponsor** – Assigns and authorises user access, verifies user identity and unlocks Smartcards. The Sponsor is responsible for identifying new users and authorising user registrations. The Sponsor is responsible for identifying the levels of access the user will require for their role and granting authorisation to add and remove user access where necessary.

- **Smartcard Unlocker** – Can unlock smartcards and renew smartcard certificates.

- **Organisational Registration Authority Sponsor -**. The Organisational Sponsor will be the Caldicott Guardian or another board level director employed by the stakeholder organisation. This person is responsible for the overall governance of Registration Authority and Position Based Access Control arrangements.

These roles can be combined, however for certain actions where dual responsibility is required the same person cannot act as the RA Sponsor and RA Agent.

4. Registration Authority Responsibilities

- To ensure the National Registration Authority Process is adhered to in full and that any local processes are developed to support the National Registration Authority Process as outlined in the latest version of the Connecting for Health Registration Authorities Operational Guidance.

- To carry out Smartcard Registrations and Registration Authority activities in accordance with the Registration Authorities Operational Process and Guidance making sure that all Registration Authority forms are completed correctly. This includes ensuring that all new

applicants are aware of the latest NHS Care Records Service Smartcard Terms and Conditions and their responsibilities as Smartcard Users.

- To ensure that sufficient Registration Authority personnel (managers, agents and sponsors) are in place to meet the requirements of the National Registration Authority Process and the needs of the stakeholder organisations.

- To ensure that all members of the Registration Authority Team are adequately trained and familiar with local and national Registration Authority processes. This includes Registration Authority personnel keeping up to date with changes in operational guidance and the latest software and completing relevant training.

- To report incidents of misuse or anomalies to Information Security and Information Governance Managers.

- To ensure that all completed Registration Authority forms are stored securely in a locked unit and can be accessed when necessary.

- To carry out Registration Authority procedures in a timely fashion so that Users are able to access the clinical systems that they need to carry out their job.

- To ensure that Sponsors understand their responsibilities and are informed of relevant national changes. Sponsors will be familiar with the roles and activities that they are authorising and will be able to unlock Smartcards and renew certificates if necessary. Sponsor training will be implemented locally as required to meet the Registration Authority responsibilities of the organisation.

- To maintain and update user role profiles where necessary and ensure leavers user role profiles are disabled immediately their employment ceases. It will be the Sponsor's responsibility to inform the Registration Authority Team when a User leaves. The Registration Authority Team will also check monthly leavers lists provided by Human Resources and provide details of active Users to practice based Sponsors every 6 months.

- To regularly review procedures and stay up to date with national Registration Authority developments including latest software, operational guidance and its integration into Trust policies and procedures.

5. Registration Authority Processes

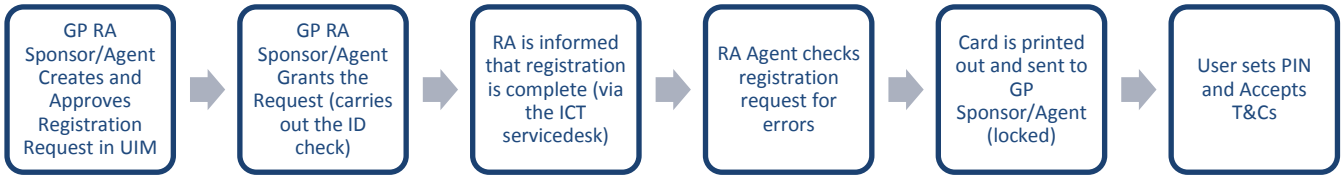
There are three groups of primary care smartcard users, General Practice, CCG Employed, Third Party Organisations (E.G. pharmacy, local government, independent healthcare providers). Each of these groups has a different set of processes for managing smartcards.

5.1 General Practice Processes

GP practices are given RA Agent status which allows the practices to carry out smartcard registrations using User Identity Manager. The practice manager identifies at least two personnel to perform the RA function. These personnel set up as both an RA Agent and an RA Sponsor. This is so that they can either approve or grant RA requests (the same user cannot approve and grant the same request).

These processes are supported by the GP Practice Registration Authority User Guide and the RA Agent Manual.

5.1.1 GP Smartcard Registration

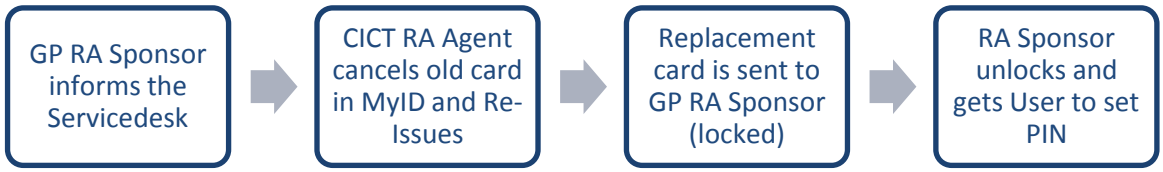


5.1.2 Adding or Removing a UIM Access Position

This process includes:

- New starters who already have a smartcard
- Leavers remaining in the NHS
- Change of Role within the practice

5.1.3 Replacing Lost/Stolen/Damaged Smartcards



If the card must be replaced urgently or there is no sponsor to unlock, then the user may visit Cheshire ICT Service to have the smartcard issued.

5.1.4 User Leaves Healthcare

5.2 General Third Party Organisation Processes

These processes cover Community Pharmacies, Local Authority, Independent Healthcare Providers and any other non GP practice or NHS organisation.

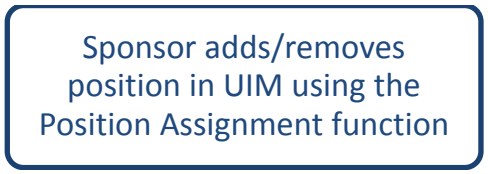
If the organisation does not have an RA Sponsor then UIM Approval will be performed by an appropriate sponsor from the CCG or Commissioning Support Organisation (usually the Information Governance Manager).

For processes relating to the transition from EPS (Electronic Prescription Service) Release 1 to EPS Release 2, refer to the Smartcard Transition Plan contained in the EPS R2 Project Documentation.

A paper based work around using RA forms will be provided by the Cheshire ICT RA Team if technical issues prevent the standard process for operating.

5.2.1 Third Party Smartcard Registration Process

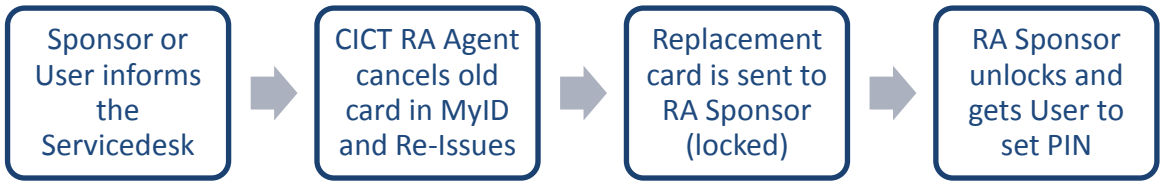
5.2.2 Adding or Removing a UIM Access Position



This process includes:

- New starters who already have a smartcard
- Leavers remaining in the NHS
- Change of Role within the practice

5.2.3 Replacing Lost/Stolen/Damaged Smartcards



If the card must be replaced urgently or there is no sponsor to unlock, then the user may visit Cheshire ICT Service to have the smartcard issued.

5.2.4 User Leaves Healthcare

5.3 Processes for Clinical Commissioning Group and Commissioning Support Unit Employed Staff

5.3.1 Smartcard Registration

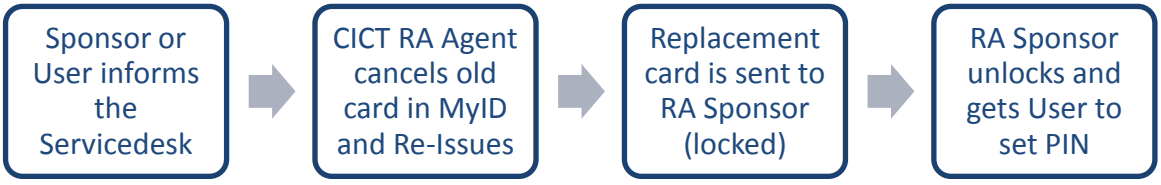
5.3.2 Adding or Removing UIM Access Position

This process includes:

- New starters who already have a smartcard
- Leavers remaining in the NHS
- Change of Role within the practice

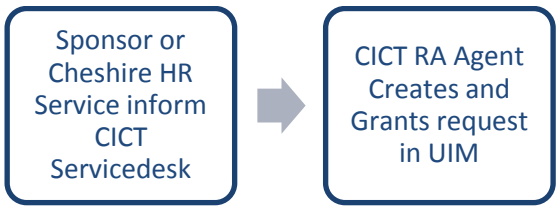
Leavers reported to Cheshire ICT Service by Cheshire HR Service will be removed via position assignment by the RA Team.

5.3.3 Replacing Lost/Stolen/Damaged Smartcards



If the card must be replaced urgently or there is no sponsor to unlock, then the user may visit Cheshire ICT Service to have the smartcard issued.

5.4.4 User Leaves Healthcare



6. Position Based Access Control (PBAC)

6.1

PBAC is the set of Access Positions that exist within User Identity Manager (UIM) which can be applied to a user's smartcard profile. Each Access Position is made up of a set of access codes which are taken from the National RBAC Database.

The PBAC is agreed locally to reflect what is required for staff groups accessing data via smartcard within an organisation.

The Registration Authority Manager is responsible for maintaining and updating the Access Positions on UIM to meet the needs of smartcard users.

6.2 Process for Tracking and Approving PBAC Changes

Includes CCGs and hosted organisations.

GP Practices

A request is raised in UIM and must be approved by the GP practice RA Sponsor / Agent.

Community Pharmacy

All community pharmacies within the CCG cluster will be offered a generic set of positions to cover their requirements for the Electronic Prescription Service (EPS) Release 2. The EPS Release 2 project board will approve these positions and any changes while the project is active. Once the project is closed this process of approval will be passed to the appropriate body.

7. Smartcard Maintenance

The Registration Authority Sponsors and GP RA Agents will carry out basic Smartcard maintenance operations including unlocking Smartcards and renewing Smartcard certificates.

When users experience problems using their Smartcard that cannot be resolved by the Sponsor they will report it to the Cheshire ICT Servicedesk. The Servicedesk Analyst will investigate the problem and escalate to the Registration Authority Team if necessary. The Registration Authority Team will then contact the user to investigate the problem.

8. Smartcard Misuse and Incident Reporting

All Smartcard users are responsible for the safety, security and use of their own Smartcard as per the terms and conditions set out in the RA01 form. In particular Smartcard users must:

- Never share their Smartcard passcode
- Never allow another user to use their Smartcard
- Never leave their Smartcard unattended unless it is stored securely
- Only access patient information that they require to carry out their role

Failure to comply with these terms and conditions will be treated as serious misconduct and dealt with through the HR disciplinary procedure.

Any member of staff must report incidents where they feel there is a risk to patient health, confidentiality or their organisation's reputation. Incidents should be reported to the Sponsor and Registration Authority Manager and the local incident reporting procedure must also be completed immediately.

9. Certificate Expiry and Renewal

Smartcard certificates are valid for two years after which the smartcard will need to be renewed. If a user attempts to log in with their smartcard and there is less than thirty days before the certificates are due to expire, the Identity Agent will notify the user that the certificates are about to expire.

The user will be given the option to self-renew, which will only work if their desktop is enabled to use the Smartcard Management System (MyID). If a software fault prevents the

user from renewing their smartcard, then it is the user's responsibility to inform a sponsor or the CICT Servicedesk that their smartcard is due to expire.

The RA Manager will provide a smartcard certificate expiry reports to appropriate personnel on request.

10. Independent Sector Healthcare Providers and Local Authorities

Cheshire ICT Service will provide Registration Authority services to Independent Sector Healthcare Providers and Local Authorities within the geographical boundaries of NHS Western Cheshire Primary Care Trust, Central and Eastern Cheshire Primary Care Trust and Warrington Primary Care Trust. This will be agreed on a case by case basis adhering to Connecting for Health Registration Authorities Operational Guidance.

Registration Authority arrangements between Cheshire ICT Service and Independent Sector Healthcare Providers or Local Authorities will be governed by an inter-organisational agreement signed by both parties (see section 16).

The Sponsor role will be assigned to a member of staff within the Independent Sector Healthcare Providers, while the Registration Authority Agent role will be performed by Cheshire ICT Service Registration Authority Team.

The operational processes for Independent Sector and Local Authority organisations are outlined in section 4.2 of this document.

11. Registration Authority Equipment

- The Registration Authority Manager will be responsible for ensuring that adequate numbers of Smartcards and working Smartcard Printers are available to meet the needs of the service.
- All Registration Authority equipment will be subject to normal Cheshire ICT Service policies and procedures governing the organisations' assets.
- Smartcard Printers will be maintained by the supplier as per the national agreement.
- The Registration Authority Manager is responsible for carrying out and documenting an Equipment Needs Assessment every six months.

12. Registration Authority Forms

Registration Authority (RA) forms will be used as a paper based fall back to User Identity Manager.

- The Registration Authority Team will ensure that completed Registration Authority and EPS forms are kept secure and confidential at all times.
- Registration Authority forms will be stored in a secure location where they can be easily accessed when necessary by authorised staff.

13. Auditing

The management and use of Smartcards will be subject to internal and external audit to ensure local and national policies are being followed. An annual internal audit will be carried out by the Cheshire ICT Service Information Security Team. This information will be reported to the Information Governance Teams of the Cheshire ICT Service stakeholder organisations.

Auditing will look to confirm that:

- All Registration Authority documents are used and stored appropriately
- Smartcards are handled securely by users
- User Role Profile amendments are performed appropriately
- Access to NPfIT Applications are controlled and managed appropriately
- Unused Smartcards are stored safely and securely

To aid in the audit process the Registration Authority Team will keep local records of Registration Authority activity including:

- Details of lost or stolen Smartcards.
- Details of all Registration Authority Sponsors and GP RA Agents

14. Registration Authority Reporting

Registration Authority Reporting allows the Registration Authority Team to produce management reports on NCRS users. The Registration Authority Team will produce ad hoc reports on request for any organisation that it provides Registration Authority services to.

In addition to this the Registration Authority Manager will ensure that relevant Sponsors receive regular reports detailing live NCRS User Profiles for their organisation/practice/department/service. The Sponsor will be responsible for ensuring that any anomalies are reported to the Registration Authority Team, so that they can be investigated.

Registration Authority reports containing user details will only be made available to appropriate Registration Authority personnel. Where Registration Authority Reports are saved on computers access will be protected from non-Registration Authority users in keeping with current guidance on person identifiable data. Printed Registration Authority Reports will only be circulated between Registration Authority personnel, and will be handled and stored securely.

15. Cheshire ICT Servicedesk

All Registration Authority requests will be directed through the Cheshire ICT Servicedesk.

Telephone: 0844 800 9982
Email: servicedesk@cheshireict.nhs.uk

16. Reference Documents

The following documents can be found on the documents page of the Integrated Identity Management section of the Connecting for Health website.
http://nww.connectingforhealth.nhs.uk/iim/documents

- Registration Authorities Operational Process and Guidance
- National RBAC Database
- Registration Authority Forms (RA01-RA08)

17. Registration Authority Service Agreement for Independent Sector Healthcare Providers and Local Authorities

This Agreement is between **Cheshire ICT Service and …….....** **…….. .** It is intended to guide the inter-organisational governance arrangement between the Parties for the approval, issue, management, and monitoring of Smartcards to NHS Care Record Service users employed by ……., whilst ensuring compliance with all statutory requirements, policies and procedures; as well as Department of Health guidance.

With the introduction of the NHS Care Records Service applications, it is of paramount importance that patients of the NHS are confident that their medical records are being appropriately kept secure and confidential in line with the NHS Care Records Guarantee. To achieve this objective all NHS Care Records Service compliant applications require healthcare professionals/workers who require access, to be registered and issued with a unique identification log-in, known as a Smartcard, and have an appropriate access profile(s).

Cheshire ICT Service Responsibilities

The NHS RA Manager/RA Agent will:

1. Ensure that all NHS RA policies and procedures are adhered to in full.

2. Perform RA Management duties, such as providing routine and appropriate smartcards for ……. staff, where there is a clinical or administrative need to access records of NHS patients, and as described in the published guidelines.

3. Be responsible for providing introductory individual training to Sponsors with regard to their role in PIN management.

4. Be responsible for providing training and guidance material for the use of User Identity Manager

5. Be available to answer queries as required by the Sponsors.

6. Provide and notify 3rd Party Organisation Sponsors of any changes made to RA policies in line with the RA processes and guidelines.

7. Conduct periodic internal audits, if desired, to ensure compliance with NHS RA policies and procedures and reciprocally share the results with Information Governance Staff and 3rd Party Organisation Sponsors/Managers.

8. Provide, as requested, a list of current smartcard users to 3rd Party Organisation Sponsors/Managers.

9. Conduct appropriate card management as per published guidelines.

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3rd Party Organisation Sponsor Responsibilities:

1. The ..... Sponsor will identify administrative and clinical users requiring access to records of NHS patients, as described in the published guidelines. The 3rd Party Organisation sponsor will sponsor administration staff only. Clinical staff employed by the 3rd Party Organisation will be sponsored by the CCG Organisational Sponsor.

2. To use User Identity Manager to assign the appropriate level of access to each individual users

3. To use User Identity Manager to create and approve smartcard registration requests.

4. To inform Cheshire ICT Service immediately if a User loses their Smartcard or any other security breach relating to Smartcards occurs.

5. To ensure that user access is removed within a timely fashion when a user leaves the organisation.

6. To ensure all Cheshire ICT Service RA policies and procedures are adhered to in full.

7. To act as PIN manager for smartcards in the event of forgotten passcodes.

8. 3rd Party Organisation Sponsors may not sponsor other sponsors.

9. Ensure compliance with the Data Protection Act 1998, the NHS Confidentiality Code of Practice, Computer Misuse Act 1990.

Responsibilities of Users

1. To keep their smartcard safe and secure at all times
2. Devise and use passcodes known only to themselves for the function of the smartcard
3. Report any security breach they observe of smartcard policy or procedure to the 3rd Party Organisation Sponsor.

CSU Information Governance Manger

Signature	**Date**

Cheshire ICT Registration Authority Manager

Signature	**Date**

Third Party Organisation Representative

Signature	**Date**