

TRUST WIDE DOCUMENT

	<b>Policy and Procedure</b>
<b>DOCUMENT TITLE:</b>	Registration Authority Policy and Procedure
<b>DOCUMENT NUMBER:</b>	ELHT/F26 V1
<b>DOCUMENT REPLACES Which Version</b>	HR78 V1
<b>LEAD EXECUTIVE DIRECTOR DGM</b>	Director of HR and OD
<b>AUTHOR(S):</b> Note should <u>not</u> include names	RA Manager

<b>TARGET AUDIENCE:</b>	All Trust Personnel
<b>DOCUMENT PURPOSE:</b>	To ensure East Lancashire NHS Trust adhere to and comply with the HSCIC National Registration Authority Policy
<b>To be read in conjunction with (identify which internal documents)</b>	HSCIC Registration Authority Policy

<b>SUPPORTING REFERENCES</b>	<ul style="list-style-type: none"> <li>• Information Governance Toolkit</li> <li>• Data Protection Act 1998</li> <li>• Information Governance Policy</li> </ul>
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<b>CONSULTATION</b>		
	<b>Committee/Group</b>	<b>Date</b>
<b>Consultation</b>	Information Governance Steering Group (IGSC)	July 2017
<b>Approval Committee</b>	Information Governance Steering Group (IGSC)	July 2017
<b>Ratification date at Policy Council:</b>	March 2018	
<b>NEXT REVIEW DATE:</b>	August 2020	
<b>AMENDMENTS:</b>	Updated the version number and type to reflect changes in responsibility within the organisation	

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## 1. Introduction

- 1.1. The Registration Authority is the governance framework within which NHS organisations can register individuals as users of the NHS Care Records Service (CRS) and other IT services, ensuring maintenance of confidentiality and security of patient information. Having a common and rigorous approach to how users are registered and given access to the NHS CRS and other services is an integral part of the Trust's governance requirements.
- 1.2. The NHS Smartcard is the card issued to the user by the Registration Authority and contains an electronic chip that is used to access the NHS CRS and other spine-enabled applications, along with a PIN. The chip itself does not contain any personal information, providing only a secure link between the NHS CRS and the database holding the users information and access rights. The combination of Smartcard and PIN helps protect the security and confidentiality of patient information.
- 1.3. As more national applications and clinical systems are released in line with the Government's National Programme for Information Technology (NPfIT), the RA function and the NHS smartcard plays an increasingly vital role in the continued development of information security and patient care; Both of which constitute core aspects of the Trust's stated vision and values.
- 1.4. The process of gaining access to these National Applications, e.g. Choose & Book, Secondary User Services (SUS) and Summary Care Record, is carried out by the Registration Authority using an Integrated Identity Management (IIM) interface, which combines the benefits of the Electronic Staff Record (ESR) with the RA's system 'Care Identity Service' (CIS). The benefits of system integration are stated within this policy. The registration process is operated at a local level by the Trust's Registration Authority (RA) which is required to conform to the National Registration Policy and Practices identified below.
- 1.5. Unauthorised access, modification, transfer, disclosure, or deletion of computer held records are criminal offences under the Computer Misuse Act 1990. An offender is liable to a fine, five years' imprisonment, or both. Such offences will constitute gross misconduct and may result in summary dismissal. Unauthorised access, modification, transfer, disclosure, or deletion of manual records may be subject to disciplinary action as may misuse of the Trusts' E-mail and Internet services.
- 1.6. This policy describes procedures for the operation of the Registration Authority (RA) within the Trust.

## 2. Overview

For Healthcare Professionals to access HSCIC applications they need to be registered. The registration process for the National Programme has to meet the current Government requirements and will be applied nationally. All the HSCIC applications use a common security and confidentiality approach. This is based upon the NHS professional's organisation/s role/s, area/s of work and business function. The primary method by which users will be enabled to access an HSCIC application is via a Smartcard issued during the Registration Process. Once an applicant has been successfully registered they will have a User ID, pass-codes and Smartcard – which will permit their access to the appropriate application/s and information. The process of gaining access to the National Programme applications is called National Programme Registration. The Registration Process is operated at a local level by a Registration Authority who are required to conform to the National Registration Policy and Practices identified below.

This document describes procedures for the operation of the Registration Authority (RA) within East Lancashire Hospitals NHS Trust.

The use of the word staff in this document means, people who are directly employed by, or contracted to provide service to, or are part of an agreement with the East Lancashire Hospitals NHS Trust.

The East Lancashire Hospitals NHS Trust needs a Registration Authority to manage the distribution and use of Smartcards.

The East Lancashire Hospitals NHS Trust will comply fully with the latest published National Policies and Procedures identified in the following documents:

- Registration Authorities Setup and Operation (available from: <http://systems.digital.nhs.uk/rasmartcards>)
- Registration Policy and Practices for Level 3 Authentications (available from <http://systems.digital.nhs.uk/rasmartcards/docs/>)
- The NHS Confidentiality Code of Practice ([www.dh.gov.uk](http://www.dh.gov.uk))
- NCRS Acceptable Use Policy, Terms and Conditions (available from <http://systems.digital.nhs.uk/rasmartcards>)

The procedures covered in this document are the local support procedures necessary to support the National Policies and Procedures:

- Identification and Appointment of RA Team Members
- Registration of RA Manager
- Registration of RA Agents
- Registration of Sponsors
- Registration of HSCIC Application Users
- Management of HSCIC Application Users
- Management of RA/User Smartcards
- Management of RA/User PIN/Pass-codes
- Management of RA/User Profiles

### 3. Target

It is intended that this document is used by the following people:

- East Lancashire Hospitals NHS Trust Board Members.
- All users of the East Lancashire Hospitals NHS Trust RA Service.
- East Lancashire Hospitals NHS Trust Human Resources personnel.
- East Lancashire Hospitals NHS Trust IT Services personnel.
- East Lancashire Hospitals NHS Trust Confidentiality Specialists including Caldicott Guardians.

This document will be published within the East Lancashire Hospitals NHS Trust and made available to all HSCIC Application users.

### 4. RA Organisation

The Registration Authority (RA) is an official or committee within the East Lancashire Hospitals NHS Trust with appropriate organisational authority who are responsible for ensuring that all aspects of registration services and operations are performed in accordance with National Policies and procedures (See section 1). They are responsible for providing arrangements that will ensure tight control over the issue and maintenance of electronic Smartcards, whilst providing an efficient and responsive service that meets the needs of the users.

**The Registration Authority has the following responsibilities:-**

- Ensuring that the National Registration processes are adhered to in full as identified in NPfIT -NCR-DES-0294.02 Registration Policy and Practices for Level 3 Authentications, NPfIT -FNT-IMD-IME-0182.02 Registration Authorities Setup and Operation and this document
- Ensuring that the RA01, RA02 and RA03 forms are appropriately used
- Ensuring that any local processes developed to support the National Registration processes are adhered to in full
- Ensuring that there is sufficient availability of resource to operate the registration processes in a timely and efficient manner to meet their organisational responsibilities

- Ensuring that the RA team members are adequately trained and familiar with the local and national RA processes
- Ensuring that an indexed and secure audit trail is maintained of applicants registration information (RA01) and profile changes (RA02, RA03)
- All completed application forms and associated documents are kept secure in an area where the RA's and HR team have access, in line with HSC 1999/053 which stipulates the retention duration for HR type records.
- Ensure RA members are familiar with and understand Registration Policy and Practices for Level 3 Authentications NPfIT -NCR-DES-0294.02, NPfIT -FNT-IMD-IME-0182.02 Registration Authorities Setup and Operation and this document.
- Ensure Sponsors are familiar with and understand NPfIT -FNT-IMD-IME-0184.01 User Registration - Sponsor Briefing (available from <http://systems.digital.nhs.uk/rasmartcardsdocs/>)
- Notification of the creation and revocation of RA managers (including their e-mail address) by emailing the RA Lead AT the HEALTH AND SOCIAL CARE INFORMATION CENTRE ([katherine.tyte@hscic.gov.uk](mailto:katherine.tyte@hscic.gov.uk))
- Ensuring that there are sufficient Smartcards and Smartcard issuing and maintenance equipment for the organisation. Note: see NPfIT -FNT-IMD-IMPPROCP-0001.01RA Hardware Ordering Process
- Ensure sponsors identified via the Executive have the business function of "sponsor" associated with the appropriate organisation job profile/s.

All East Lancashire Hospitals NHS Trust RA Members will have sufficient training to carry out their RA tasks in accordance with National Policies and Procedures. They will be individuals capable of trust as they will be handling sensitive information covered by The Data Protection Act. They will be key players in ensuring the NHS Code of Confidentiality and NPfIT -FNT-TO-IG-0052.01 NCRS Acceptable Use Policy, Terms and Conditions (available from <http://systems.digital.nhs.uk/rasmartcards/>) is followed.

The East Lancashire Hospitals NHS Trust Registration Authority is made up of the following personnel:

- Registration Authority Managers
- Registration Agents

The services available will be:

- User Registration
- Role Profile maintenance
  - adding Role Profiles
  - changing Role Profiles
  - deactivating Role Profiles
- Revocation and cancelling of Smartcards
- User Suspension
- PIN/Pass-code resetting
- Smartcard renewal and exchange

The above services will be available during the East Lancashire Hospitals NHS Trust Registration Service Core hours, 09:00 to 17:00 Monday to Friday, not bank holidays.

#### **4.1. Incident Reporting**

Incidents may be reported by any member of staff where they feel that there is a risk to patient health, confidentiality or East Lancashire Hospitals NHS Trust reputation. Incidents should be reported, using the East Lancashire Hospitals NHS Trust Incident Procedure, to the RA Manager.

Examples of incidents are:

- Smartcard or application misuse.
- Smartcard theft.
- Non-compliance of local or national RA policy.
- Any unauthorised access of HSCIC applications.

- Any unauthorised alteration of patient data.

The RA manager will consider all incidents reported to them. Any incidents considered significant will be escalated to the East Lancashire Hospitals NHS Trust Board, HR and/or the East Lancashire Hospitals NHS Trust Caldicott Guardian depending on the nature of the incident. A major breach of security will also be reported by the RA manager to the LSP and the HSCIC to ensure any risks resulting from the event can be taken into account and mitigated against.

A significant incident is an isolated incident or a series of less significant incidents that could lead to a serious degradation of healthcare or information security. The East Lancashire Hospitals NHS Trust Board and Caldicott Guardian will consider incidents reported to them and decide whether East Lancashire Hospitals NHS Trust systems or working practices should be reviewed as a result.

Incidents involving breaches of security or demonstrate that a User may not be considered trustworthy should also be reported to HR and Caldicott Guardian by the RA Manager so that any disciplinary measures required may be taken. HR will decide which other members of staff need to be involved (e.g. line manager, IT Manager).

Incidents will be reported by using the designated RA Helpdesk on 01254 732341. In the event of failure or unavailability of applications this should be reported to the IT Services Helpdesk on 83135.

## **4.2. Registration Authority Manager**

The RA Manager is selected by the East Lancashire Hospitals NHS Trust Executive and is responsible for the set up and day to day running of the East Lancashire Hospitals NHS Trust RA service. The RA Manager must ensure that all RA procedures are carried out in accordance with local and national policy.

### **4.2.1. RA Manager Reporting**

RA Managers will report significant incidents to the East Lancashire Hospitals NHS Trust Board as per section 3.1 Incident Reporting.

### **4.2.2. Appointment of RA Managers**

The Board has identified the RA Manager/s for the East Lancashire Hospitals NHS Trust as follows.

Jamie O'Neill	82500 – opt 2	(01254 732500)
Claire McDonagh	82500 – opt 2	(01254 732500)

## **4.3. Registration Sponsors**

Sponsors are appointed and entrusted to act on behalf of the East Lancashire Hospitals NHS Trust Executive team in determining who should have what access and maintaining the appropriateness of that access.

They have two specific responsibilities:-

- Identification of the type of access to information a user's needs via an HSCIC application – the organisation they belong to and their Role Profile.
- Attendance at the face to face meeting if they are personally vouching for the identity of a user who they know to have worked for two or more continuous years in the East Lancashire Hospitals NHS Trust.

Sponsors are responsible for granting on behalf of the East Lancashire Hospitals NHS Trust, who can access what healthcare information. Sponsors will be held accountable by the East Lancashire Hospitals NHS Trust for their actions. Sponsors are responsible to the East Lancashire Hospitals NHS Trust Executive to ensure only appropriate access to HSCIC Applications is granted.

Sponsors will be identified by the East Lancashire Hospitals NHS Trust Executive, or the Caldicott Guardian as being suitable persons by virtue of their status and role. Sponsors will be registered by an RA Manager or Agent on behalf of the East Lancashire Hospitals NHS

Trust Executive in accordance with instructions given by the East Lancashire Hospitals NHS Trust Executive. Sponsors will be staff with sufficient seniority to understand and accept the responsibility required. Registration Sponsors are responsible to the RA Manager for the accuracy of the information on the RA01, RA02 and RA03 forms.

The RA Manager will publish and maintain the list of sponsors and it will be available in the Workforce Information office.

#### **4.4. Appointment of Registration Sponsors**

Sponsors will be selected from East Lancashire Hospitals NHS Trust staff. The East Lancashire Hospitals NHS Trust has approved the following process for appointing the Registration Sponsors:

Currently East Lancashire Hospitals NHS Trust sponsors will be:

- Business Managers
- Health Centre Building Managers
- Departmental Heads
- Team Leaders
- Medical Secretarial Supervisors

All Sponsors are required to provide documentary evidence to prove their identity. The RA Manager will keep sample Sponsor's signatures for comparison with Sponsor's signatures on RA forms. RA forms may be scanned and transmitted by e-mail and sent to RA Agents for processing. The original RA form must be sent to the RA within three working days. Registration Sponsors are responsible for making sure that National Programme application users are given the minimum appropriate level of access needed to perform their job.

The areas of responsibility with respect to HSCIC Application user access should be clearly defined for each Sponsor.

#### **4.5. Sponsor Reporting**

Registration Sponsors and Agents will report any RA related incidents, using the East Lancashire Hospitals NHS Trust incident reporting procedure to the RA Manager. Additionally Sponsors and RA Agents will report any operational difficulties especially where these have patient healthcare implications to the RA Manager. Under the following circumstances a report should be made to the Caldicott Guardian : Mrs. Rineke Schram, Medical Director, East Lancashire Hospitals NHS Trust.

#### **4.6. Registration Agents**

Registration Agents are responsible to the RA Manager for ensuring that the National and local processes are followed and for the accurate input of information on RA forms onto the HSCIC Care Identity Service RA Agents will usually be from HR or IT.

Registration Agents will ensure that all inter-Trust agreements are followed and adhered to. All incidents, misuses, anomalies and problems will be reported to the RA Manager

#### **RA Agents – RA Recruitment Team 82075**

#### **4.7. All Staff**

All Smartcard users must adhere to the regulations set out in the National Terms and Conditions document in regards to the registration process and Smartcard usage.

### **5. Smartcard Governance**

All Trust staff have a duty to keep patient and staff information secure and confidential. The Smartcard provides users with the level of access to healthcare information they require as part of their Healthcare role. All users must keep their Smartcard safe and use it appropriately. To summarise when using a smartcard users should;

- Always keep their Smartcard safe and secure



- Never tell anyone their smartcard PIN
- Never allow anyone else to use their Smartcard
- Never leave their Smartcard unattended
- Never leave their Smartcard in the card reader when not actively using it
- Immediately report its loss, theft or damage to the Registration Authority Team

Breach of the terms and conditions of issue and/or of Trust procedures relating to smartcard usage may lead to disciplinary action.

RA responsibilities should be managed as an organisation *Information Asset*, by the assigned *Information Asset Owner* (IAO), or equivalent. The IAO will further ensure that individuals assigned RA responsibilities, have sufficient skills and access to knowledge to perform their roles, that there are procedures to ensure all Smartcards and access profiles are issued appropriately and that RA equipment (hardware and software) and consumables meet current specifications, are adequately maintained, subject to business continuity and contingency planning needs, and are securely stored

Standard / Process / Issue	Method	By	Committee	Frequency
There are established business processes and procedures that satisfy the organisation's obligations as a Registration Authority	RA SOP Guidance	RA Manager	Steering Group	Ongoing
	-RA Quarterly	RA Manager	Steering Group	Quarterly
	-RA Intranet Info pages	RA Manager	Steering Group	Ongoing

The Registration Authority will continually promote the compliancy of smartcard use and improve the necessary processes and procedures through the measures stated in the tables above. Any breaches of security identified through the above measures will be investigated in accordance with the Trust's Disciplinary Policy.

## 6. Processes

We will ensure that processes supporting the identification, registration and management of staff will be integrated with other East Lancashire Hospitals NHS Trust processes as appropriate.

All our RA policies and procedures will be auditable by internal auditors as well as external auditors. Audits would typically cover:

- the issuance of Smartcards
- the management of Smartcards
- the profiles associated with users in relation to what they do
- the use of Smartcards
- the use of HSCIC applications
- identity management
- security of supplies and equipment

### 6.1. Starters

As part of normal induction processes new staff required to use HSCIC Applications will be:

- Introduced to the relevant Sponsor who will identify the appropriate role profile for the user and take them through the East Lancashire Hospitals NHS Trust RA processes required. This could be how to become registered or, if the User already holds a Smartcard issued by another East Lancashire Hospitals NHS Trust, adding the necessary Role Profile/s.

- Trained on the aspects of HSCIC Application use relevant to their role/s. (This guidance must be written as well as verbal)
- Trained on the National and East Lancashire Hospitals NHS Trust RA processes.

Where full registration is required; the Applicant will be required to bring suitable forms of identification with them.

Where staff are recruited to a role which requires access to National HSCIC Applications it is important that the following points are considered:

- checks on an applicant's ID are made during recruitment to ensure that RA Level 3 identification requirements can be met
- offers of employment are dependent on the applicant's ability to meet and continue to meet all requirements for HSCIC access
- induction processes include the issuing of Smartcards (where the applicant is not an existing Smartcard holder) and adding of the appropriate role profile(s)
- staff should be trained sufficiently prior to the use of Smartcards and/or HSCIC Applications
- staff must sign to acknowledge that they have read and understood the policies and procedures governing the use of Smartcards and HSCIC Applications (RA01 form)
- All HSCIC Application Users must have sufficient training to carry out their HSCIC Application tasks without risk.

All the above processes will be integrated into the standard employment processes of the East Lancashire Hospitals NHS Trust, as much as possible to prevent duplication.

## **6.2. Leavers**

When staff are leaving, the following points must be considered:

- All East Lancashire Hospitals NHS Trust role profiles in the HSCIC Care Identity Service pertaining to the employee must be deactivated as soon as is practical.
- If the User is transferring to another NHS related location e.g. GP practice, Acute Trust etc. and they can provide details/proof then the current registration details will be copied and sent to the new location – the user is allowed to retain the Smartcard but their East Lancashire Hospitals NHS Trust profile in this organisation is removed.
- Staff permanently leaving the NHS should have their certificate revoked and the Smartcard issued to them should be destroyed (Examples of permanently leaving would include retirement, leaving for employment in a non-NHS job or taking up full-time education etc.)
- The RA Manager must be notified by giving as much notice as possible by relevant sponsor or line manager.
- The required actions must be taken as soon after the staff member leaves as possible.
- The RA Manager will run a monthly leavers report and revoke Smartcard access to staff who are listed as leaving the Trust.

## **6.3. Contractors**

The East Lancashire Hospitals NHS Trust will ensure all contractors who need to use the HSCIC applications are bound to the Data Protection Act and The NHS Confidentiality Code of Practice ([www.dh.gov.uk](http://www.dh.gov.uk)). This will include the process to be taken in cases of a breach and liability issues.

## **7. Management and use of RA Equipment**

The RA Manager, on behalf of the East Lancashire Hospitals NHS Trust, will be responsible for ensuring that adequate numbers of Smartcards are available and maintaining the Smartcards throughout their useful life. The IT Manager will ensure that there is sufficient computer equipment to support all users of HSCIC applications (including those for registration). All RA equipment will be subject to policies and procedures governing the management and control of East Lancashire Hospitals NHS Trust Assets.

**Doc. Ref:**  
**(Equipment Management Policy ELHT/C63)**

## 8. Management of HSCIC Application Users

### 8.1. Registration Forms

The East Lancashire Hospitals NHS Trust will ensure they use the latest version of the RA forms as published on the <http://systems.digital.nhs.uk/rasmartcards/docs/> website and ensure it is up to date with the National forms.

All East Lancashire Hospitals NHS Trust RA Team members will receive Training on the RA forms and their use. Special training will be arranged whenever RA forms are changed significantly.

#### 6.1.1 RA01

The RA01 form is used to record the registration of new HSCIC Application Users and should be used as published on the <http://systems.digital.nhs.uk/rasmartcards/docs/>  
The RA01 is in *three* sections:

- Section 1 Applicant details – To be completed and signed by the applicant
- Section 2 Glossary
- Section 3 Applicant's initial privileges and confirmation the Sponsor did/didn't vouch for the users' identity – To be completed by the Sponsor (conformant to the Registration Policy and Practices for Level 3 Authentications) and RA Agent/Manager to record details of registration.
- Section 3 For RA & Sponsor use only

The RA01 form is held by the applicant until the RA Manager/Agent registers the applicant on the HSCIC Spine User Database. Once registration is completed the RA01 form is delivered securely to the Workforce Information office where the RA forms are logged and filed, to be available for RA Managers/Agents/Sponsors/auditors as necessary. RA forms should be transported in sealed opaque envelopes.

#### 6.1.2 RA02

The RA02 form is used to record changes made to an existing HSCIC Application User's Role Profile(s). This will be necessary whenever employee HSCIC Application related roles start or end in the East Lancashire Hospitals NHS Trust.

Whenever a change to a User's Role Profile is identified the relevant Sponsor must be requested to authorise the changes required. The following are examples of when Role Profile changes would be needed:

- A Medical Admissions Secretary changes departments
- A Senior Nurse covers a colleague's role as a Nursing Manager during a period of sick leave.
- An Administrator takes on an extra job in a different department.
- A Junior Doctor's assignment in a department comes to end.

Once the relevant Sponsor has authorised the change(s) the RA02 form shall be processed by the RA. Should there be any problems with the form these will be referred to the signing Sponsor.

Once RA has completed the changes on the RA02 form it will be delivered securely to the workforce information office where the RA forms are logged and filed, to be available for RA Managers/Agents/Sponsors/auditors as necessary. RA forms should be transported in sealed opaque envelopes.

#### 6.1.3 RA03

The RA03 is used to record revocations. Whenever it is necessary to revoke a certificate associated with a Smartcard a RA03 form must be completed and signed by the Sponsor. Sponsor should only do this when it has been confirmed by HR the user has left the organisation or in the case of disciplinary action, on the express request by HR. Once complete the RA03 should be sent to the RA team for action.

The RA team need to cross check revocations with HR to prior to making any changes to ensure they revoke the access of the correct user and be especially diligent. Smartcards should be retained by the East Lancashire Hospitals NHS Trust and then destroyed as soon as is practical after the staff member has finished.

Once RA has completed the changes on the RA03 form it will be delivered securely to the office where the RA forms are logged and filed, to be available for RA Managers/Agents/Sponsors/auditors as necessary. RA forms should be transported in sealed opaque envelopes.

#### **6.1.4 RA04**

This document is to be completed, where necessary, by a Sponsor to change a profile on a Fallback Smartcard for a specific user.

#### **6.1.5 RA05**

This document is to be completed when a user changes their name - it may be completed by the user and given to the RA when the users Smartcard is re-issued.

#### **6.1.6 RA06**

This document is designed to allow the Sponsor to apply to the Registration Authority for a Positions access profile to be changed. A Position change is where the Organisation, Job Role, Area of Work, Activity or Workgroup are added/removed to the Position.

#### **6.1.7 RA07**

This document is designed to allow the Sponsor to apply to the Registration Authority for a Templates access profile change for a Template. A Template change is where the Organisation, Job Role, Area of Work, Activity or Workgroup are added/removed to the Template.

### **8.2. Smartcards**

Smartcards should be treated with care and protected to prevent loss or damage.

#### **6.2.1 East Lancashire Hospitals NHS Trust name on Smartcards**

Organisation Names are no longer printed on the Smartcard.

#### **6.2.2 Lost, Stolen and Broken Smartcards**

Lost and damaged Smartcards should be reported to the RA Team as soon as is practicable by the member of staff whom the card belongs by contacting the RA Team on 01254 732075. Once notified that a Smartcard has been lost or damaged the RA based Agents will arrange to have the lost/damaged Smartcard revoked and replaced (see below) as soon as possible. In the case of loss or theft the RA Manager must be informed so that checks may be made to ensure that the Smartcard has not been misused.

When an issued Smartcard becomes unusable or it is lost or stolen the Smartcard certificate must be revoked, see section 6.2 Leavers and Revocation. Revocation renders the Smartcard useless.

As long as the Smartcard holder's identity can be verified at a face to face meeting a new Smartcard may be issued.

If there is any difficulty verifying the user's identity the user's Sponsor must be contacted and the users identity verified. It is vital that the Sponsor's identity can be relied upon when contacting them to verify the user's identity.

#### **6.2.3 PIN/Pass-code Unlocking/Changing**

Users who have forgotten their PIN/Pass-code or suspect that it may be known by another or who have been locked out of HSCIC Applications because of three failed login attempts; should report the problem to the RA Team as soon as is practicable by contacting the RA Recruitment Team on 01254 732075.

Once notified the RA based Agents will arrange to have the PIN/Pass-code changed with the user. This task must be carried out by a Registration Agent or Sponsor. The Smartcard holder must be present.

#### **6.2.4 Smartcard Misuse**

A staff member must report suspected Smartcard misuse in line with East Lancashire Hospitals NHS Trust incident reporting policy and procedure. Depending on the severity of the allegation an investigation may be required. If it is suspected that a Smartcard is being misused then it should be reported to HR who may request that the certificate associated with the Smartcard should be suspended or revoked as appropriate.

If Smartcard misuse by a East Lancashire Hospitals NHS Trust staff member is discovered the appropriate disciplinary measures must be taken. The RA Manager will consult with HR and the matter must proceed using East Lancashire Hospitals NHS Trust Disciplinary Processes.

### **8.3. Profiles**

What a user is able to access is based on the information in the profile.

Whenever there is a temporary and permanent change in the way a person works, a review of the person's HSCIC Application access must be carried out. If there are significant changes to the staff member's role the relevant Role Profile on the HSCIC Spine User Database must be requested via a suitable Sponsor. Examples of changes that would necessitate such changes are changes to a person's:

- Job Title
- Access requirements
- Department
- Site(s)
- Work Group

Where new roles are being added or roles are being changed the Registration Sponsor of the relevant work area will complete an RA02 form which is used to update the user's profile. When a particular role comes to an end the profile must be updated by deactivating the role as soon as is practical after the role has ceased.

Where the user is leaving the NHS please refer to section 6.2 Leavers and Revocation. New roles should be added to the User's HSCIC User Directory entry a short while (a maximum of three days) prior to the start of the new role so that the profile is available for use. (Also see Section 6.1 Registration Forms)

### **8.4. Leavers and Revocation**

During the leaving process HR will establish whether the User is leaving the NHS permanently (retirement, education or a non-NHS job) or joining another NHS organisation. Where the User is moving to another organisation HR will notify the RA Manager who will arrange for any Role Profiles associated with East Lancashire Hospitals NHS Trust to be deactivated.

There are occasions when it is necessary to deactivate a Smartcard by revoking the Smartcard certificate. Reasons for this include:

- The Smartcard is lost or stolen
- There has been some other security breach associated with the Smartcard or Smartcard certificate.
- The user is no longer employed by an NHS organisation

Revocation tasks can only be carried out by RA Team Members.

Where the revocation is needed due to a staff member leaving the NHS HR will inform the RA Manager accordingly so that the correct actions can be taken (Spine User Directory and/or CMS).

Where the revocation has been requested by HR because of security related events the RA Manager will authorise the appropriate action and inform the following staff as appropriate:

The HR Manager  
The relevant Sponsor(s)  
The RA User

Revocation renders the Smartcard useless.

Revocation can only be carried out by Registration Managers and Agents on the request of HR.

#### **8.5. Locums, Agency and Bank Personnel**

Temporary staff filling roles may need access to HSCIC records as part of their role. The following points should be considered:

- staff working as part of a team may not need a Smartcard to fill the role
- some temporary staff could already be enrolled and will only require a role profile added
- temporary staff who are Smartcard holders may not have sufficient training in the use of the particular HSCIC / NHS Digital Application needed to be accessed

#### **9. Local support processes for HSCIC Application users**

HSCIC Application Users who need support should contact the IT Helpdesk on 83135.

#### **10. Local Audit**

The management and use of Smartcards will be subject to internal and external audit to ensure that national and local policies are being followed. Specifically, Auditors will look to confirm that:

- Smartcards are handled securely by Users
- RA documents are used and stored appropriately
- Access to HSCIC Applications and Records is controlled appropriately
- Unused Smartcards are stored safely and appropriate records are kept
- PBAC role allocation and de-allocation is performed appropriately
- Random checking of PBAC roles with those requested by the sponsor

To aid audit the following records will be maintained:

- the number of Smartcards held
- details of Smartcards issued

#### **11. Comment/queries on the policy to:-**

Registration Authority Managers at:

Human Resources  
Park View Offices  
Royal Blackburn Hospital  
Haslingden Road  
Blackburn.  
Lancs  
BB2 3HH