



**Dorset
Clinical Commissioning Group**

NHS Dorset Clinical Commissioning Group

Local Registration Authority Policy and Procedures



Supporting people in Dorset to lead healthier lives

PREFACE

This policy sets out the local policy and procedures for the issue and control of Smartcards.

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Evidence Base References	Date
NHS Digital – Information Governance Toolkit	2018
Registration Authorities Setup and Operation (available from https://digital.nhs.uk/article/311/Registration-Authorities-and-Smartcards)	
Registration Policy and Practices for Level 3 Authentications (available from https://digital.nhs.uk/article/311/Registration-Authorities-and-Smartcards)	
The NHS Confidentiality Code of Practice (www.dh.gov.uk)	
NCRS Acceptable Use Policy, Terms and Conditions (available from https://digital.nhs.uk/article/311/Registration-Authorities-and-Smartcards)	
RA Process Guidance (available on NHS Digital website) https://digital.nhs.uk/article/311/Registration-Authorities-and-Smartcards	

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Registration Authority Policy and Processes

1. INTRODUCTION

- 1.1 This document sets out the local policy for issue and control of Smartcards for accessing National Computer Applications within the NHS Dorset Clinical Commissioning Group (CCG).
- 1.2 This document also describes the procedures for the operation of the Registration Authority (RA) within the NHS Dorset CCG.
- 1.3 These local processes and policy are in addition to the national policies and process which can be found on the NHS DIGITAL website.

2. PURPOSE

- 2.1 Healthcare professionals need to be registered with NHS DIGITAL in order to access NHS DIGITAL applications. The registration process for NHS DIGITAL has to meet the current government requirements and will be applied nationally.
- 2.2 All NHS DIGITAL applications use a common security and confidentiality approach which is based upon the NHS professional's organisation(s) role(s), area(s) of work and business function.
- 2.3 The primary method by which users are enabled to access an NHS DIGITAL application is via a Smartcard issued during the registration process. Once an applicant has been successfully registered, they will have a User ID, passcodes and Smartcard which will permit their access to the appropriate application(s) and information.
- 2.4 The process of gaining access to the NHS DIGITAL applications is called registration. The registration process is operated at a local level by a Registration Authority which is required to conform to the National Registration Policy and Practices.
- 2.5 It is of benefit to have both RA Sponsors and RA Agents who are part of General Practices and Pharmacies. In such cases, the General Practice and Pharmacy staff are responsible to their host, the CCG, for their RA roles (Sponsor or Agent).
- 2.6 The CCG has established a Registration Authority to manage the distribution and use of Smartcards, and the CCG (working with their general practices and pharmacies) will comply fully with the latest published National Policies and Procedures.
- 2.7 The policy and procedures covered in this document are necessary to support the national policies and procedures.

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3. SCOPE

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

- Senior General Practice staff;
- Senior Community Pharmacy staff
- All staff using the CCG RA Service;
- CCG Workforce Team;
- CCG/General Practice based IT Services personnel;
- CCG/General Practice Confidentiality specialists including Caldicott Guardians and Information Governance specialists;
- IT Support Service personnel (Healthcare Computing Limited), local CCG IT support staff).

3.1 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 NHS Dorset CCG.

3.2 This document is published on NHS Dorset CCG local intranet website <http://intranet.dorsetccg.nhs.uk/support/it-support/smartcards.htm> (old) and <https://nhsdorsetgp.sharepoint.com/sites/IT/SitePages/Smart-Card-Information.aspx> (new) and the NHS Dorset CCG Internet website <https://www.dorsetccg.nhs.uk/services/smartcard>. It is the responsibility of the Organisation's Management Team to bring this to the attention of relevant staff.

4. DUTIES/ RESPONSIBILITIES AND ACCOUNTABILITY

Registration Authority

4.1 The local Registration Authority operates from the NHS Dorset CCG, and has appropriate organisational authority and a combination of officers responsible for ensuring that all aspects of registration services and operations are performed in accordance with national policies and procedures. The RA is responsible for providing arrangements that ensure control over the issue and maintenance of electronic smartcards, whilst providing an efficient and responsive service that meets the needs of the users.

4.2 The CCG Registration Authority works to the national RA policies and procedures listed on the NHS DIGITAL website. The responsibilities of the RA function are set out in the national documentation, including the roles of the:

- Governing Body;
- RA Managers (CCG based);

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- RA Agents and Advanced RA Agents (CCG, General Practice and Pharmacy based);
- RA Sponsors (CCG, General Practice and Pharmacy based);
- RA Agent ID Checker

4.3 The services provided by the RA include:

- user registration;
- role profile maintenance;
- adding role profiles;
- changing role profiles;
- deactivating role profiles;
- assigning and de assigning 'positions' using the smartcard management software CIS (where these are defined);
- revocation and cancelling of Smartcards;
- user suspension;
- PIN resetting;
- changes to 'Shared Secrets', user defined security information;
- Smartcard renewal and exchange.
- Perform smartcard on site audits

4.4 The above services are available during the Registration Service core hours – 08.00 to 16.00 Monday to Friday, excluding bank holidays.

4.5 Contact details for the Registration Authority Service desk are:

- Telephone: 01305 368011
- Email: smartcard.support@dorsetccg.nhs.uk

4.6 Governing Body - Responsible Leads

Dr Phillip Richardson (Director – Systems Integration Directorate) for the NHS Dorset CCG board is the Senior Responsible Officer (SRO) for the RA function and reports to the board on RA activities.

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The Information Asset Owner (IAO)

Steve Howes, Registration Authority Manager (RAM). Upon request and at the end of financial year the RAM provides reports and data to Dr Phillip Richardson (SRO), the Information Governance Group (IGG) and the Audit and Quality Committee.

RA Agents, Sponsors and RA Managers

4.7 All NHS Dorset CCG RA Members are provided with sufficient training to carry out their RA tasks in accordance with national policies and procedures. These roles include the handling of sensitive information covered by the Data Protection Act 2018 the NHS Code of Confidentiality and the National Care Records Service (NCRS) Acceptable Use Policy and Terms and Conditions.

4.8 The staff employed as RA Managers, Lead Sponsor and the Responsible Lead for the Governing Body is documented on the NHS Dorset CCG intranet site:
<http://intranet.dorsetccg.nhs.uk/support/it-support/smartcards.htm>. And
<https://nhsdorsetgp.sharepoint.com/sites/IT/SitePages/Smart-Card-Information.aspx>

4.9 There are a number of detailed documents which are designed to help the CCG RA Agents, Sponsor, ID Checkers and RA Managers understand their responsibilities and perform their roles in a consistent way. All of these documents are provided in the files section of the Smartcard Team in Microsoft teams the link is below but is only accessible to members of the Smartcard Team for security purposes:

<https://teams.microsoft.com/#/files/General?threadId=19%3A75b1466467c74c8ea697540dd11528f0%40thread.skype&ctx=channel&context=Policies%2520%2526%2520Procedures&rootfolder=%252Fsites%252FSmartcardTeam%252FShared%2520Documents%252FGeneral%252FPolicies%2520%2526%2520Procedures>

These documents, where necessary, are also displayed on the Smartcard support intranet site to provide guidance to Practice and Pharmacy based RA staff.

4.10 These documents provide detailed processes for RA Managers, RA Agents and Sponsors including lists of daily, weekly and monthly tasks.

4.11 In addition to the national process guidelines, there are local registration policies and procedures which support (but do not contradict) the national policy and procedures:

- local procedure for dealing with misuse of cards, lost or stolen cards;
- local leavers and joiners procedure;
- local RA governance policy;
- local training policy;
- local policy on the safe storage arrangements for RA documentation, consumables and hardware.

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Information Governance Group

- 4.12 Governance of the local RA function will be undertaken by the CCG SID Directorate via the Senior Information Risk Owner (SIRO). The RA Manager will report to the SIRO in the following way:
- Update to the meetings when requested, with the following documentation:
 - * highlight report showing RA progress and any issues requiring action;
 - * report of each RA's activity on the Smartcard Management System;
 - * report on lost and stolen cards;
 - * local RA audit plan - this will be a project plan detailing number and type of audit; as a minimum, one annual audit of RA activity;
 - An annual report for the DSP Toolkit containing all the necessary information listed under the RA function section. This will be reported via the same process;
 - Any concerns over misuse of cards or any issues which may adversely affect Smartcard users or the data in systems will be reported using an exception report. Individual misuse issues will be reported to the IG Team at the time of the incident. Consideration will be made to include contacting the CCGs Counter Fraud Team and Security Team regarding the miss use of any Smartcard, contact details can be found within the CCG's Fraud and Security Polices.
- 4.13 The IG Group will ensure that the Governing Body are advised of any issues concerning the RA function.

All Staff

- 4.14 All NHS Dorset CCG 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 that they require as part of their healthcare role. All users must keep their Smartcard safe and use it appropriately.
- 4.15 All users must report suspected or actual breaches of Smartcard security according to the CCG Incident Reporting Procedures.
- 4.16 All users must adhere to the usage conditions stipulated in the Smartcard Terms and Conditions guidance. The terms and conditions can be viewed on the RA intranet pages. To summarise, when using a Smartcard users should:
- always keep their Smartcard safe and secure;
 - never tell anyone their Smartcard PIN;

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- 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 RA team.

4.17 All staff issued with a Smartcard have a responsibility to familiarise themselves and comply with these policy/procedures and with the Smartcard Terms and Conditions. Any breaches of this policy/procedures or the Smartcard Terms and Conditions will be investigated in line with the CCG disciplinary procedures.

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5. SAFE STORAGE OF DOCUMENTS, HARDWARE AND CONSUMABLES

- 5.1 RA responsibilities are managed as a CCG Information Asset and recorded on the Information Asset Register. The IAO ensures 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.
- 5.2 Both Vespasian and Canford RA teams have specified lockable cupboards to store documents and hardware. The key holders are the RA Team, RA Managers, and the spare key for emergencies is located with the local helpdesk.
- 5.3 Smartcards must not be left accessible and must be kept securely when not in use. It is the responsibility of all staff to ensure that their own Smartcards are secured when not in use.

6. MANAGEMENT AND USE OF REGISTRATION AUTHORITY EQUIPMENT

- 6.1 The RA Manager, on behalf of the CCG/Practice/Pharmacy, is responsible for ensuring that adequate numbers of Smartcards are available and maintaining the Smartcards throughout their useful life. The Head of IT (Infrastructure) will ensure that there is sufficient computer equipment to support all users of NHS DIGITAL applications (including those for registration).

7. TRAINING

- 7.1 Appropriate training will be given as follows:
- all staff that require RA Agent or Sponsor spine access must read the RAA briefing document (on intranet), complete the RAA or Sponsor briefing form which should then be sent to the Smartcard Support team (via email). They will then be contacted by the Smartcard team to ensure they have the appropriate knowledge. They should also complete the appropriate face to face training provided by Dorset CCG relevant to their position;
 - all Smartcard users will receive relevant guidance or training before accessing any local or national application for the first time. It is the local RA Agents responsibility to ensure that users are booked onto and receive such training.
- 7.2 Training courses for staff involved in RA procedures will be held at regular intervals.
- 7.3 'How to Guides' and briefing documents are available on the local intranet.
- 7.4 Further training on RA/Sponsorship procedures can be requested at any time by calling the Smartcard Support Team.

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8. MONITORING COMPLIANCE

8.1 The CCG has a responsibility to ensure that staff members and those working on behalf of the organisation that have been issued with an NHS Smartcard, comply with the terms and conditions of issue. Any breach of process will be reported under The CCG Conduct and Capability Policy which contains a disciplinary process. If found guilty this could result in the loss of employment, and potential criminal action involving the CCGs Counter Fraud and Security teams

Audit

8.2 The management and use of Smartcards is subject to internal and external audit to ensure that national and local policies are being followed. An audit plan is in place which sets out the audit schedule, including annual audits. Specifically, auditors will look to confirm that:

- Smartcards are handled securely by users in line with the NHS Smartcard Terms and Conditions;
- RA documents are used and stored appropriately/securely;
- access to NHS DIGITAL applications and records is controlled appropriately;
- unused Smartcards are stored safely and appropriate records are kept;
- Role Based Access Control allocation and de-allocation is performed appropriately according to the CCG processes for starters and leavers;
- random checking of RBAC roles with those requested by the sponsor.

8.3 To assist with the audit process, the following records are maintained:

- the number of Smartcards held;
- details of Smartcards issued.

Reporting

8.4 The RA will also provide additional regular reporting of Smartcard usage including:

- audit trails;
- alerts;
- regular reports to the CCG's Information Governance Group;
- regular reports for RA management.

8.5 The RA will continually promote Smartcard compliance and improve processes and procedures when required.

9. PROCEDURES

9.1 These procedures support the national RA policy and procedures.

Registration of Users

9.2 RA Agent processes supporting the identification, registration and management of staff are integrated with other CCG/Practice/Pharmacy processes, including recruitment procedures, starter and leaver procedures and the disciplinary policy.

9.3 Each Directorate/Practice/Pharmacy is responsible for advising the Smartcard Support Team when active Sponsors or Registration Agents leave in order that they can keep the list up to date.

9.4 Access to any RA documentation will only be provided following a request in writing. Information will only be released to those persons with a legitimate reason for accessing the information; if there is any doubt, the Caldicott Guardian will be consulted.

10. PROCESS FOR NEW STARTERS

CCG Recruitment

10.1 As part of the CCG recruitment process, a *New Contract Request Form RMT07* will be completed for all new staff recruited to the CCG. The line manager will indicate on this form whether or not a Smartcard will be required. The workforce team will then carry out the necessary pre-employment checks required by the organisation, in line with the CCG's Recruitment Procedures. This will ensure that the RA's Level 3 identification requirements can be met.

10.2 Offers of employment are dependent on the ability of the applicant to meet and continue to meet all requirements for NHS DIGITAL access.

New Card Issuance

10.3 As part of normal induction processes, new staff requiring access to NHS DIGITAL applications will be introduced to the relevant RA Sponsor (usually a Head of Department or Practice Manager), who will identify the appropriate role profile for the user and take them through the required CCG/Practice/Pharmacy RA processes.

10.4 This could be how to become registered or, if the user already holds a Smartcard issued by another organisation, adding the necessary role profile(s). Where full registration is required, the applicant will be required to bring suitable forms of identification with them.

10.5 The applicant will complete the "CIS – Request Create User" form and read the Smartcard Terms and Conditions accompanying the form. The form will then be sent to the RA Support Team (email smartcard.support@dorsetccg.nhs.uk), along with the necessary documentation for verifying identification.

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- 10.6 Once the form and ID have been checked, the RA Support Team will process the information on Care Identity System (CIS). This will then be completed and approved by the Smartcard Support Team. If the location, such as a Pharmacy or Practice, has their own RA Agent, the ID checks can be made locally. The RA Agent can then either enter the details directly into the Smartcard Management System CIS, or attach the CIS Form – Create User to an email and send to: smartcard.support@dorsetccg.nhs.uk.
- 10.7 For CCG staff, physical issue of Smartcards will be by direct handover from the Smartcard Support Team. The card will be printed and issued to the new user who will then be required to input their password.
- 10.8 The new user will then be required to login with the Smartcard and agree online (digitally) to the Smartcard Terms and Conditions, acknowledging that they have read and understood the policies and procedures governing the use of Smartcards and NHS DIGITAL applications.
- 10.9 Smartcards for Practice and Pharmacy staff may be sent (locked) by mail to the RA user at their place of work. The new user will be prompted to contact their RA Agent, Sponsor or System Administrator who will unlock their card and ask them to enter their password and agree to the Smartcard Terms and Conditions.
- 10.10 Staff issued with new cards containing an RA Agent or Sponsor function must be given their cards face to face at the Smartcard Support Team locations.

Secondments

- 10.11 There may be occasions where staff are employed by another organisation, but are seconded to work for the NHS Dorset Clinical Commissioning Group through partnership working. If the employee already holds a Smartcard and needs to continue using a Smartcard, the employee's new line manager should notify the Smartcard Support Team by attaching the CIS Form – Assign Position to an email, who will add a new profile to the card, as required. Once the employee returns to their initial organisation, the Smartcard Support Team should be notified using the same form and this position will be removed.
- 10.12 Where the seconded employee requires a Smartcard for their work with the CCG and does not already hold a card, the CCG process for new card issuance should be followed.

Training

- 10.13 New users will receive training on RA processes and how to use their Smartcard from their Line Manager/Practice Manager/Pharmacist/Store Manager/Smartcard Support Team.

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11. PROCESS FOR LEAVERS OR CHANGE OF ROLE

CCG Leavers and Joiners

- 11.1 NHS Dorset CCG workforce team will immediately advise the Smartcard Support Team by emailing smartcard.support@dorsetccg.nhs.uk. The user's profiles for the CCG will then be closed (or the user closed if they are leaving the NHS). This should be done within 24 hours of the leaving date.

Practice Leavers and Joiners

- 11.2 In a Practice, it is the responsibility of the Practice RA Agents to remove user profiles/positions for their Organisation Data Service (ODS), in CIS, within 24 hours in the event of a Smartcard user leaving the practice.
- 11.3 If an employee already has a Smartcard and requires access to a new practice, the Practice RA Agent should add this using CIS.

Pharmacy Leavers and Joiners

- 11.4 In the event of staff leaving, Pharmacies should either add/close the staff members profile within CIS for their ODS code or advise the Smartcard Support Team by completing the CIS Form – Assign/De-assign Position and then email this document attached to the smartcard.support@dorsetccg.nhs.uk. The user's profiles for ODS code will then be closed (or the user closed if they are leaving the NHS).
- 11.5 This process is shown on the Dorset CCG site: <http://www.dorsetccg.nhs.uk/aboutus/medicines-management/smartcards-for-pharmacists.htm> and is in the pharmacy briefing documents which RA Agents and RA Sponsors have to sign to say they have understood, prior to being given RA Agent and RA Sponsor rights.
- 11.6 Users with a Smartcard who require access to a different or additional location should complete the CIS Form – Assign Position, and then attach this in an email to: smartcard.support@dorsetccg.nhs.uk.

Pharmacy Change of Profile

- 11.7 If an individual changes their profile (e.g. name change) within the organisation and requires an update to their Smartcard, the RA Agent or Sponsor should either complete the changed online within CIS or complete the CIS Form – Modify User and email this to the Smartcard Support Team on: smartcard.support@dorsetccg.nhs.uk. The Support team will then authorise and ensure the changes are made.
- 11.8 Changes to a profile may require additional ID information to be checked. If the Pharmacy does not have an RA Agent, the user will need to attend a CCG location to have their ID checked (e.g. marriage certificate for name change).

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12. PROCESS FOR STOLEN, LOST AND MISUSE OF SMARTCARDS

- 12.1 Stolen, lost or misused cards must be reported to the Smartcard Support Desk immediately using either the direct telephone number: 01305 368011 or by sending an email to: smartcard.support@dorsetccg.nhs.uk.
- 12.2 If a card has been lost or stolen and the user has access to the Smartcard Management System, they will be advised to 'Remote Cancel Card'. If they do not have access, the Smartcard Support Team will do the 'Remote Cancel Card' for them. This should be done as soon as it is reported. The user should then use the normal process for requesting a new card, and the old card will be disabled within 24 hours.
- 12.3 The local RA team will record the incident and retain the initial email from the user for a period of 2 years.
- 12.4 If requests for new cards are received via the Smartcard Management System, the RA Support Team will ensure that the original card has been cancelled by the local RA Agent by checking the user's profile. This is done when the user confirms receipt of the new card by email. All cards are sent via mail and the user is advised that the card will be cancelled if they do not contact the Smartcard Support Desk to advise of safe receipt of the card.
- 12.5 If a card has been reported as misused, this should be reported in the same way; the team will then log the incident. If the incident is considered serious they will 'Remote Cancel Card'. The issue will then be reported to the Information Governance Team for appropriate action to be taken. Who may also decide to involve the Counter Fraud and security teams if deemed necessary.
- 12.6 If there is any difficulty verifying the user's identity, the user's Sponsor must be contacted and the user's identity verified. It is vital that the Sponsor's identity can be relied upon when contacting them to verify the user's identity.
- 12.7 This process is advertised on all email correspondence from the Smartcard Support Team and has also been sent out via email to all RA Agents. This procedure is also displayed on the Smartcard support intranet page and the RA Agent briefing document which must be signed and understood by all RA Agents.

13. PROCESS FOR INCIDENT REPORTING

- 13.1 All suspected or actual breaches of Smartcard security must be reported promptly in line with the CCG Incident Reporting Procedure. All staff are individually responsible for reporting security incidents.
- 13.2 A security breach leaves both the CCG and the individual liable to prosecution under the Data Protection Act 2018 and Computer Misuse Act 1990.
- 13.3 A breach of Smartcard security is defined as:

'any action or incident which has been caused by, or could result in, the wilful or accidental unauthorised access, disclosure, alteration, corruption or

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deletion of any data held on, or produced by, a computer which relates to a patient, a member of staff or the commercial activities of the CCG and its purchasers and suppliers’.

13.4 Examples of such incidents include:

- Smartcard or application misuse;
- Smartcard theft;
- non-compliance with CCG policy;
- unauthorised access of NHS CRS applications;
- unauthorised alteration of patient data.

13.5 The incident will be reviewed by the RA Manager and any significant incidents will be escalated to the relevant IG Team and Information Security Manager/Senior Practice staff/Caldicott Guardian for investigation and action. Senior management will be involved in serious cases.

13.6 A major breach of security will also be reported by the RA Manager to the local service provider and to NHS DIGITAL, to ensure any risks resulting from the event can be taken into account and mitigated against.

13.7 A significant incident is defined as:

‘an isolated incident or a series of less significant incidents that could lead to a serious degradation of healthcare or information security’.

13.8 A log of incidents is kept by the Information Governance Team and reviewed by the Information Governance Group to establish whether security measures and working practices should be reviewed as a result.

14. PASSWORD MANAGEMENT

14.1 User passwords must be kept confidential at all times. The following processes are followed to ensure password security:

- NHS Dorset CCG does not facilitate remote re-setting of passwords;
- all new cards are sent out locked. The user must then contact the local RA Agent using the National Care Records Service (NCRS) Smartcard management services options to reset their password. The user must be present to input their own password;
- all instances of locked Smartcards must be referred to a local RA Agent and unlocked using the method described above.
- Self-Service Smartcard unlock is now available via CIS. The smartcard user must register for this service to be undertaken and used only by the smartcard user.

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14.2 Upon renewal of certificate, the password process outlined above must still be followed.

Appendix A

Document Approval

Individual Approval			
If you are happy to approve this document, please sign and date it and forward to the chair of the committee/group where it will receive final approval.			
Name:	Steve Howes	Date :	24/02/2020
Signature :			
Committee Approval			
If the committee is happy to approve this document, please sign and date it and forward copies to the person with responsibility for disseminating and implementing the document and the person who is responsible for maintaining the organisation's database of approved documents.			
Name:		Date :	
Signature :			