

# **Registration Authorities: Governance Arrangements for NHS Organisations**

**Gateway Reference Number 6244**

<b>Document Type</b>	<b>Policy</b>
<b>Author</b>	<b>Department of Health</b>
<b>Published Date</b>	<b>6 April 2006</b>
<b>Primary Audience</b>	<b>Executive Management Team in PCT's, Acute Trusts, Foundation Trusts, SHA's and Special Authorities, Mental Health Trusts</b>
<b>Gateway reference</b>	<b>6244</b>
<b>Pages</b>	<b>8</b>
<b>Electronic only</b>	<b>Yes</b>
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## 1 Background

With the introduction of the NHS Care Records Service (NHS CRS) 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* (see [http://www.connectingforhealth.nhs.uk/all\\_images\\_and\\_docs/crbb/crs\\_guarantee\\_2.pdf](http://www.connectingforhealth.nhs.uk/all_images_and_docs/crbb/crs_guarantee_2.pdf)). To achieve this objective all NHS Care Records Service compliant applications require healthcare professionals/workers requiring access, to be registered and issued with a Smartcard and have appropriate access profile(s).

The Registration process consists of three distinct activities:

- 1) Registration of identity – a user is sponsored to be issued with a Smartcard; has their identity checked to eGif level 3 and a personal details record is created in the Spine User Directory (SUD); this part need only be performed once, by a Registration Authority Agent or Manager.
- 2) Choosing appropriate access to NHS CRS functionality/information (via their profile) and linking it to the SUD record; this may be changed as necessary (by each organisation); a profile requires a sponsor's approval and they are granted by a Registration Authority Agent or Manager.
- 3) Creating a card to link the user (Smartcard holder) to their SUD record and access profile(s) and hence allow access to NHS CRS.

The Registration process for the National Programme is required to meet the current Government eGif (authentication) requirements and these need to be applied nationally. This assures the identity of the individual applying for registration and access.

The Registration process is operated at a local level by a Registration Authority (RA). All Trusts and all NHS Authorities are required to conform to the National Registration Policy and Procedures identified. *Registration Policy and Practices for Level 3 Authentications - NPFIT-NCR-DES-0294.06 v3* or latest version.  
*Note:* All documents referenced in this paper are available on the RA web site: <http://nww.connectingforhealth.nhs.uk/implementation/registrationauthorities/>

All the NHS Care Records Service compliant applications use a common security and confidentiality approach. This is based upon the Healthcare professional's/worker's organisation(s), role(s), area(s) of work and activity(ies) (formerly business functions) – which make up their access profile.

Access profiles need to give staff access to the patient information and software functions that they need to perform their role within the organisation.

Healthcare professionals/workers will have their access profile approved by a Sponsor assigned by the local organisation's Executive Management Team.

## 2 Objectives and Audience

This document is aimed at the Board and Executive Management Team, providing a high level overview of Registration and assignment of profile(s) to users by the local Registration Authority. It identifies what actions need to be

taken by the Executive Management Team to set up and operate their local Registration Authority; and the national obligations placed upon all Registration Authorities.

*Note:* the Registration Processes identified in this document does not remove any obligations Trusts or NHS Authorities currently have to fulfil.

### **3 Reference and Standard Documents**

This document has been developed to assist the creation and operation of Registration Authorities. It does not supersede any of the requirements identified in *Registration Policy and Practices for Level 3 Authentications - NPFIT-NCR-DES-0294.06 v3* or latest version. This document and *Registration Authorities Operational Process and Guidance* replace the requirements in *Registration Authorities Setup and Operation Phase 1 Release 1 NPFIT-FNT-IMD-IME-0182.04*.

### **4 Responsibilities of NHS Organisations**

All NHS organisations are responsible for the registration of NHS CRS users whether their own staff or those of independent contractors, independent providers, voluntary organisation and other public bodies appropriate to that NHS organisation. They should do so within the policy and guidance frameworks of the Department of Health and Connecting for Health. These responsibilities in every NHS registration authority should be integrated into the host organisation's Information Governance Framework.

### **5 Information Governance Responsibilities**

It is recommended that the Board of the NHS organisation:

1. Ensure that the RA functions are embedded in the Information Governance Framework for the NHS organisation to ensure the best interests of patients are reflected in registration procedures;
2. Nominate a Board member to provide leadership at Board level for Registration and
3. Receive periodic reports from the Registration Authority.

It is recommended that that the Executive Management Team of the NHS organisation:

- a) Embeds in the Information Governance and Performance Management Framework, governance of their Registration Authority. To discharge these governance responsibilities it is recommended that senior organisation managers responsible for Risk, Human Resources, Professional leads, Information Technology and Caldicott Guardians are assigned. At least one or more members of the Executive Management Team must be directly involved in the governance of the Registration Authority. The Registration Authority needs to have at the heart of its thinking protecting patient's interests and the obligations placed on staff through the patient guarantee. Consideration also needs to be given to how the patient perspective is incorporated into this governance framework. The individuals/team providing this governance need to be familiar with this document and the obligations it contains;

- b) Reviews and approves, where appropriate, the assignment of the RA Manager(s) and Sponsor(s) to the Registration Authority. RA Manager assignments need to be notified to Health Authorities or in the case of Health Authorities NHS CFH clusters so that the RA Manager can be registered as such;
- c) Directs RA Managers and Sponsors to work within the Information Governance and Performance Management framework within the organisation and
- d) Reviews and approves, where appropriate, inter-organisational agreements, Fallback Smartcard distribution and usage policy, the use of Fallback Smartcards for testing during commissioning and any other local processes proposed by the Registration Authority Manager.

## **6 Role of Registration Authorities**

The role of the local Registration Authority is to ensure that individuals providing healthcare services to the NHS directly or indirectly have timely access to NHS Care Records Service applications in accordance with their healthcare role. It is the organisation's responsibility to ensure that all the requirements of Registration Authorities are met and maintained.

The RA, within the local governance structure, will ensure that all aspects of Registration Authority services and operations are performed in accordance with RA Policy and Procedure requirements identified in Registration Policy and Practices for Level 3 Authentication and Registration Authority Operational Process and Guidance documents. It is important that all members of the RA Team, Manager, Sponsors and Agents are aware of the confidential nature of some of the information captured during registration and preserve its confidentiality.

## **7 Registration Authority Governance**

The organisation's Registration Authority will:

1. Produce periodic reports to the Board;
2. Identify how RA services are to be delivered by the organisation (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. Identify to the Executive Management team for approval any proposed agreement with another organisation to provide RA services (this includes other NHS and non-NHS organisations);

4. Identify the appropriate number of organisational Sponsors, and define the process by which suitable Sponsor candidates will be identified for approval by the Executive Management Team. Sponsors must be trusted individuals who the Executive Management Team are confident will, where there is an operational need, assign appropriate access to functionality, as well as to the clinical and confidential data held within NHS Care Records Service applications. This may require the organisation to only permit Sponsors to perform this role within a restricted area e.g. Modern Matrons may only sponsor registrations for all clinical nursing/midwifery staff working within their ward or department;
5. Where the Executive Management team wishes to assign non-NHS staff as either a Sponsor or RA Agent, it will ensure that they can demonstrate a clear decision and approval making process, within the context of the information governance arrangements in the organisation. The information governance arrangements need to identify the basis for the full or partial empowerment of both Sponsor and RA Agents eg non-NHS RA Agents will only manage user profiles and will not perform registrations;
6. Develop the policy for the issue of Smartcards to NHS and non NHS users whom they are responsible for registering;
7. Ensure that the necessary support functions (Training, IT, HR and RA Support) are in place and are aligned with the needs of RA (i.e. out of hours arrangements, etc.);
8. Ensure that the national policies and procedures are considered when developing the local Information Governance framework i.e. *Registration Policy and Practices for Level 3 Authentication, Registration Authority Operational Process and Guidance* ;
9. Ensure a regular review of local policies and procedures e.g. HR Starters and Leavers, is undertaken and updates made, where necessary, to align them with Registration Authority requirements;
10. Establish or update an Incident/Risk Management process to local Registration Authority operation;
11. Where there are inter-organisational agreements, ensure that the organisations are able to meet their Registration Authority responsibilities. Typical instance of the need for inter-organisational agreements include;
  - a. Where some or all of the registration processes are delivered by a shared service facility.
  - b. Where a NHS organisation performs registration processes for non NHS organisations, this includes where appropriate, the assignment by the Executive Management team of non NHS Sponsors and Agents within these non NHS organisations.
12. Define the policy for identifying which temporary staff require access NHS CRS and their registration needs;
13. Define the policy for lost, stolen forgotten and damaged Smartcards requiring urgent replacement (via Fallback Smartcards) see appendix in *Registration Authority Operational Process and Guidance*;

14. Send notification of the creation and revocation of RA Managers (and their email address and contact telephone number) to [ramanagers\\_agents@cfh.nhs.uk](mailto:ramanagers_agents@cfh.nhs.uk) to ensure the mailing list is kept up to date permitting timely communication of policy and guidance. Note: RA Managers may also identify RA Agents to be included on the RA Managers distribution list.

## **8 Who should register whom, and with which organisation**

Registration Authorities will generally only grant Applicants with role profiles for the organisation the applicant is working in or where they can demonstrate a clear decision making process and approval, within the context of the information governance arrangements to assign the role profiles or as explicitly directed by the Registration SRO. (Further guidance on the assignment of access can be found in *Registration Authorities Operational Process and Guidance*).

Note the Electronic Prescription Service (EPS) release 1 provides no NHS CRS access and is covered by its own guidance see *Electronic Prescription Service registration policy* Gateway 5975 and *Registration of Community Pharmacy users for Release 1 of the Electronic Prescription Service* NPFIT-FNT-IMD-IME-0187.05.

### **8.1 Non-NHS Organisations**

Where NHS organisations are providing Registration services to non-NHS organisations they should notify the National Administrative Codes Service (NACS team - [datastandards@cfh.nhs.uk](mailto:datastandards@cfh.nhs.uk)) so an association can be made between the organisations. This link in the future will be required to permit the NHS organisation to act on behalf of the non-NHS organisation.

## **9 RA Manager Responsibilities**

The organisation's RA Manager(s) 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.

## **10 RA Agent Responsibilities**

The RA Agent(s) will be responsible for ensuring RA services are delivered in accordance with the policy and governance to users of RA services.

## **11 Sponsor Responsibilities**

The Sponsors will be responsible for approving, where appropriate the registration and profiles to be granted to users. Additionally, they may be responsible for the appropriate issue of Fallback Smartcards, Passcode resetting and vouching for the identity of users – all subject to the policy and governance framework.