



Lindsay McClure MRPharmS
Head of Information Services
[E-mail: Lindsay.McClure@psnc.org.uk](mailto:Lindsay.McClure@psnc.org.uk)

PCL(s): 010/08

4th February 2008

To: **Secretaries of Local Pharmaceutical Committees in England for action**

Dear Secretary,

EPS Release 1 Smartcard Certificate Renewal

Smartcards contain two digital certificates for the purpose of authentication. As a security measure, to support protecting against unauthorised access to patient information, these certificates must be renewed every two years.

Renewal of the certificates held on cards is the responsibility of local Registration Authorities (RA). It is essential that LPCs work closely with local RAs to ensure that the arrangements being put in place for the renewal of smartcard certificates are efficient and manageable. Please find below, the key points for discussion with local RAs. There is limited central guidance on this issue available to local RAs therefore in some cases; LPCs may be better informed than RAs. We are continuing to push the National Registration Authority to issue detailed guidance to local RAs. Information contained within this PCL(S) may be shared locally as appropriate.

Determining whether certificates on a smartard are due for renewal

Certificates can be renewed up to three months preceding the date of expiry. Pharmacists can find out when the certificate on their card is due for renewal by contacting their local Registration Authority. LPCs may wish to encourage local RA's to proactively contact pharmacists with information on the expiry date their certificates.

Some local RA's have provided guidance to pharmacists on finding out this information using the 'Gemplus' software installed on pharmacy systems, however **not** all pharmacy systems can provide this information on-screen. This is therefore not recommended as an option to promote locally.

A planned future enhancement to the system will enable users to be informed proactively on-screen if the certificates are due to expire within the next three months.

Arrangements for renewal

It is the responsibility of local Registration Authorities (RA) to put in place arrangements for renewing the certificates on smartcards. The card itself is re-used, it is only the certificates held on the card that need to be updated. Options that may arise in local discussion include:

- *Posting cards back for certificate renewal:* CFH recommends that cards posted back for

certificate renewal should first be locked, for example by entering an incorrect passcode three times before posting (however it is important to note that locked cards can only be unlocked by a sponsor or RA agent – so it may not be practical for the RA to post cards back to pharmacies. A remote unlock facility is expected to be available in pharmacies later in the year). The local RA may also ask that any cards put in the post are sent by recorded delivery. If the RA is uncomfortable with cards being posted, an alternative option would be for the RA to arrange for cards to be collected and delivered back to pharmacies.

- *Online Self-renewal of certificates:* Currently staff in a number of other areas of the NHS can self-renew their cards online at a site on the N3 network (an nww site). This is not yet possible in community pharmacies however Connecting for Health and pharmacy system suppliers are working to ensure that this is an option in the near future.
- *RA visits to Pharmacies:* To renew a card, the RA needs access to a specific website on the N3 network (nww site) and access to two smart card readers. The necessary site may not be accessible from all pharmacies, therefore this is unlikely to be a practical option at this point in time.
- *Renewing cards at a local GP Surgery:* In some areas where there is a good relationship between GPs and the PCT locally, RA's have suggested that pharmacists can arrange to meet the RA at a local GP surgery to have their cards updated rather than travel to a PCT Office. A GP surgery is likely to have access to the necessary website and 2 smart card readers.
- *Pharmacist visit to the PCT Office:* Some RAs may suggest this. This is likely to be a burdensome and costly option for the majority of pharmacists, for example locum cover may need to be arranged and transport costs incurred.
- *Renewing cards at PCT or joint PCT/LPC Events:* The RA needs access to a specific website to renew cards (nww site). It may be possible to renew cards at events held in appropriate premises, for example the PCT Office. An alternative option would be for cards to be collected at local meetings for certificate renewal with the PCT RA then arranging delivery back to the pharmacist.

If pharmacists do not renew the certificates on a smartcard before expiry, they will no longer be able to use their card to access the Electronic Prescription Service. In this situation, it will not be possible for a pharmacist to renew their card without having a face-to-face meeting with the Registration Authority.

Information the RA may request

We are aware some RAs have been asking pharmacists for additional information that may not have been provided when the individual's smartcard was first issued:

National Insurance Number (NIN): The NIN is shortly to become a mandatory field in the Spine User Directory which is the database that contains individual's user profiles for access to national systems such as the Electronic Prescription Service. The NIN is used to support registration authorities in identifying individuals on the smartcard registration system. The Department of Health has received confirmation from the Information Commissioner and the Department of Work and Pensions that the NIN number can be used for this purpose.

If individuals did not originally provide this information when applying for an EPS Release 1 smartcard, they will need to provide this information when renewing their registration or editing registration details. An RA can update an individual's profile with their NIN without the individual being present (i.e. without a face to face meeting).

Account Recovery Pass-code: The Account Recovery Pass-code is used by the RA to confirm the identity of a registered User. For example, if support is being provided to the user over the telephone, the RA could ask the user to provide, for example, the 1st, 5th and 8th characters from the pass-code to confirm an individual's identity. The pass-code is set by the user themselves during the registration meeting with the RA, a face-to-face meeting with the RA is therefore normally required to set this pass-code. At present, when using EPS Release 1, a pharmacist would not be disadvantaged by not having an account recovery pass-code setup but it will be helpful, in the longterm for pharmacists to ensure that the Account Recovery Passcode is set.

What Next? Moving pharmacists to the RA01 Form and Procedures

In Release 2 of the Electronic Prescription Service, community pharmacies will have access to a part of the NHS Care Records Service known as the Personal Demographics Services. As a consequence of this, community pharmacy staff will be required to adopt the same 'single card' access model and comply with the same security arrangements as other NHS staff accessing parts of the NHS Care Records Service.

To access EPS Release 2, all pharmacy staff that use the pharmacy system to support the dispensing of prescriptions will be required to complete **Form RA01** to obtain a smartcard and passcode with the appropriate access rights. It is anticipated that pharmacists who have already got a smartcard and passcode for EPS Release 1 will be able to upgrade their access rights without the need for another face-to-face meeting with their local RA.

Some local RA's have suggested that they may wish to transfer pharmacists over to the RA01 Terms and Conditions at the same time as renewing the EPS Release 1 cards that are approaching their expiry date. **We would not recommend this, until further guidance is issued by the National RA** for the following reasons:

- The RA01 Terms and Conditions are more stringent than the EPS01 Terms and Conditions. The EPS01 Terms and Conditions allowed pharmacists to share a 'session' with other pharmacy staff (i.e. shared access to the workstation while the pharmacist is logged in using their smartcard). This has been deemed appropriate for EPS Release 1 but not EPS Release 2. By signing Form RA01, an individual is agreeing not to allow anybody else to access a 'session' established with the NHS Care Records Service application. This level of security is not necessary for EPS Release 1 and may adversely impact on workflow, for example even where the pharmacy is operating EPS Release 1, the use of the card issued under RA01 cannot be shared. If no other dispensing staff have yet been issued with smartcards and passcodes, there will be no-one but the pharmacist able to access the Service.
- Also, there are still outstanding policy issues that will impact on how a PCT RA will register pharmacy staff to support access to Release 2 of the Service, in particular whether pharmacists will be registered linked to the premises they work in or the PCT area. Transferring pharmacists over to the RA01 Terms at this point in time may lead to a duplication in effort, for example if changes have to be made to an individual's registration settings for EPS Release 2 in light of the outcome of these policy discussions.

Some PCT RAs have opted to survey pharmacies at this point to identify how many staff members may need cards in future so that they can plan resources accordingly.

This may also be an opportunity for LPCs to start discussing with PCTs who will be appointed as sponsors to support issuing cards to pharmacy staff in Release 2. The appointment of sponsors is at the discretion of the local RA. It would be very beneficial if a permanent staff member in the pharmacy, for example a pharmacy manager or the independent contractor can be made a sponsor to support the registration of pharmacy staff and the resolution of ongoing problems such as locked cards.

EPS Release 1 Allowance

A pharmacy contractor is entitled to the EPS Release 1 ongoing allowance (£200/month) when they are in a position to operate the service if an appropriate prescription is presented or requested. A smart card is required to operate the service. If the certificates on the card expire, a contractor will not be able to use the Electronic Prescription Service therefore a PCT may suggest stopping a contractor's allowance.

LPCs may wish to discuss this concern with PCTs and to remind PCTs that they should act reasonably, and in good faith, and not use delays in the renewal process to delay payments.

We have asked the Department of Health to remind PCTs, once again, of the arrangements for reimbursing the EPS allowance – and to remind PCTs of the need to be reasonable.

Compensating contractors for costs involved in renewing cards

PSNC will be seeking to ensure that the additional workload associated with card renewal is measured so that additional costs can be recognised as an additional regulatory burden in the pharmacy contract funding arrangements.

Promoting Local Arrangements

It is important that pharmacists are aware that the certificates on their smartcards will expire. We have issued an alert in the latest issue of Community Pharmacy News and have posted a news item on our website. It would be very helpful to pharmacists if local arrangements could also be communicated for example through direct mailings from the PCT RA or communication from the LPC, for example via LPC Newsletters and/or through LPC Websites.

Please don't hesitate to get in contact if you require support on this issue.

Yours sincerely,

Lindsay McClure
Head of Information Services