



## Review Sheet

Last Reviewed  
17 Aug '20Last Amended  
17 Aug '20Next Planned Review in 12 months, or  
sooner as required.

Business impact



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this review

New Policy

Were changes made?

Yes

Summary:

This policy has been reviewed, with additional information included about Smartcards to meet CQC requirements as proof of ID, with evidence required that the ID photo was 'requested' at the time of recruitment, rather than at the time of Smartcard request. Further reading has been added and references have been reviewed and updated.

Relevant legislation:

- Health Professional Council legal framework
- The Care Act 2014
- Care Quality Commission (Registration) Regulations 2009
- Employment Rights Act 1996
- Equality Act 2010
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Health and Social Care Act 2008 (Registration and Regulated Activities) (Amendment) Regulations 2015
- Medical Act 1983
- Nursing and Midwifery Council (NMC) Legislation
- Protection of Freedoms Act 2012 (links to) The Protection of Freedoms Act 2012 (Disclosure and Barring Service Transfer of Functions) Order 2012
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018
- UK GDPR

Underpinning knowledge - What have we used to ensure that the policy is current:

- Author: Nursing and Midwifery Council, (2019), *How to search the register*. [Online] Available from: <https://www.nmc.org.uk/registration/search-the-register/how-to-use-search-the-register/> [Accessed: 17/8/2020]
- Author: NHS Employers, (2019), *Identity checks*. [Online] Available from: <https://www.nhsemployers.org/your-workforce/recruit/employment-checks/identity-checks> [Accessed: 17/8/2020]
- Author: CQC, (2017), *Nigel's surgery 41: SMARTcards*. [Online] Available from: <https://www.cqc.org.uk/guidance-providers/gps/nigels-surgery-41-smartcards> [Accessed: 17/8/2020]
- Author: CQC, (2020), *Regulation 19: Fit and proper persons employed*. [Online] Available from: <https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-19-fit-proper-persons-employed#legislation-links> [Accessed: 17/8/2020]
- Author: CQC, (2017), *Nigel's surgery 50: GP locums*. [Online] Available from: <https://www.cqc.org.uk/guidance-providers/gps/nigels-surgery-50-gp-locums> [Accessed: 17/8/2020]
- Author: NHS England, (2019), *Do primary care contractors have to use the NHS Identity?*. [Online] Available from: <https://www.england.nhs.uk/nhsidentity/faq/do-primary-care-contractors-have-to-use-the-nhs-identity/> [Accessed: 17/8/2020]



Suggested action:	<ul style="list-style-type: none"><li>• Encourage sharing the policy through the use of the QCS App</li><li>• Share 'Key Facts' with all staff</li><li>• Ensure relevant staff are aware of the content of the whole policy</li></ul>
Equality Impact Assessment:	QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.



## 1. Purpose

1.1 To determine that the information provided by an applicant in the recruitment and selection process:

- | Is genuine
- | Relates to a real person; and
- | Establishes that they own and are rightfully using that identity

1.2 To fulfil the obligation of Yewtree medical centre to use or employ only temporary staff whose identity can be verified which validates their fitness to perform the role.

1.3 For Yewtree medical centre staff members to obtain an NHS Smartcard following their appointment, based on the required identification standard being met by the individual with copies held on record by Yewtree medical centre.

1.4 To ensure that a form of identity badge, or other easy-to-read ID media, is worn by all members of the Practice Team and clearly visible to Patients and visitors, unless this presents a risk to their safety.

1.5 To support Yewtree medical centre in meeting the following Key Lines of Enquiry:

Key Question	Key Lines of Enquiry
EFFECTIVE	HE3: How does the service make sure that staff have the skills, knowledge and experience to deliver effective care, support and treatment?
SAFE	HS1: How do systems, processes and practices keep people safe and safeguarded from abuse?
WELL-LED	HW4: Are there clear responsibilities, roles and systems of accountability to support good governance and management?
WELL-LED	HW5: Are there clear and effective processes for managing risks, issues and performance?

1.6 To meet the legal requirements of the regulated activities that {Yewtree medical centre} is registered to provide:

- | Health Professional Council legal framework
- | The Care Act 2014
- | Care Quality Commission (Registration) Regulations 2009
- | Employment Rights Act 1996
- | Equality Act 2010
- | The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- | Health and Social Care Act 2008 (Registration and Regulated Activities) (Amendment) Regulations 2015
- | Medical Act 1983
- | Nursing and Midwifery Council (NMC) Legislation
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- | Safeguarding Vulnerable Groups Act 2006
- | Data Protection Act 2018
- | UK GDPR



## 2. Scope

**2.1** The following roles may be affected by this policy:

- | All staff
- | Volunteers

**2.2** The following Patients may be affected by this policy:

- | Patients

**2.3** The following stakeholders may be affected by this policy:

- | Commissioners



## 3. Objectives

**3.1** To minimise the risk of employing or engaging a person in any permanent or temporary employment or role who is:

- | An illegal worker
- | An individual impersonating another
- | Avoiding the detection of a criminal offence
- | An individual who has used illegal means to obtain genuine documents to gain employment

**3.2** For Yewtree medical centre staff members to obtain a Smartcard that enables them to access NHS electronic data in the performance of their employment duties and responsibilities.

**3.3** For the wearing of identity badges to promote the safety and security of Patients and to support good customer care, as staff identity can be verified in face-to-face interactions as well as in other communications (e.g. letters and emails, by announcement or individual signature) to help people feel more at ease in what they may experience as stressful situations.



## 4. Policy

**4.1** Yewtree medical centre will follow current [NHS Employers' guidance](#) on employment identity checks which provides all the resources necessary for safe, effective, reliable and thorough identity authentication for healthcare personnel.

NHS Employers has published temporary pre-employment check requirements for employers to follow during the COVID-19 pandemic.

**4.2** When applying for a Smartcard for a staff member for the first time, Yewtree medical centre will refer to the current NHS Employers' identity checks guidance in respect of the photographic and documentary identification required.

**4.3** All members of the Practice Team will wear or carry (according to their role and any health and safety risk assessment) authenticated identification issued by Yewtree medical centre, which will state:

- | The staff member's name; and
- | The staff member's job title or role

**4.4** All staff members will have their identity badge or other form of practice ID fully visible and not obscured by any layers of clothing when they are at work and, in particular, when in face-to-face contact with Patients.

**4.5** All staff members will announce their name at the beginning and, if necessary, during telephone contact and will sign off all forms of correspondence that is personal/individual and not generic with their own name and job title/role.

**4.6** A list of all staff members with their names and their job titles or roles will available on the website of Yewtree medical centre, and may be displayed in Yewtree medical centre, including their photograph. Staff members will carry their Smartcards in a holder on an official lanyard at all times and when not in use to prevent loss and for identification purposes, e.g. on home visits, if or when there is no other photographic identification available.

**4.7** All visitors should be expected and their details known to the person/people they are meeting at Yewtree medical centre.

Where they are a contractor or not known to anyone at Yewtree medical centre, their identity must be checked by a company ID badge and where this is not possible, the companies head office must be called to vouch for the individual. Any ID must not be copied or retained but note of ID seen may be noted in the visitors book.



## 5. Procedure

### 5.1 Locum GPs and Nurses

Yewtree medical centre must check that locums are fit for their role which forms part of their identity. Documentary evidence must be obtained from the individual or (provider agency/chambers) to confirm identity for any short or long-term locum GP or nurse, and must be kept on file. The following evidence is required:

#### Locum GP:

- | Proof of identity, including a recent photograph
- | Is a GP
- | Has medical indemnity
- | Is registered with the GMC
- | Has been revalidated in the last 5 years
- | Is on the Performers List

#### Locum Nurse:

- | Proof of identity, including a recent photograph
- | Is a nurse
- | Is NMC registered with a valid PIN number
- | Has been revalidated in the last 3 years
- | Has the training and qualifications required for the role
- | Has suitable indemnity arrangements in place for the role, if not already covered by the Clinical Negligence Scheme for General Practice (CNSGP)

### 5.2 NHS Smartcards

A Smartcard is printed with an NHS staff (including NHS independent contractors - i.e. general practice) member's name, photograph and unique user identity number. For staff members to obtain a Smartcard there must be an identity check, verified to [NHS Employers' identity check standards](#), which includes:

- | A mandatory face-to-face meeting
- | At least three forms of evidence (including photo and non-photo forms)
- | Proof of address

A copy of the Smartcard must be kept in the employee's file as proof of ID.

Where a new member of staff has not worked in the NHS before, and therefore applied for a Smartcard following appointment, Yewtree medical centre will ensure that the ID photo was 'requested' at the time of recruitment, rather than at the time of Smartcard request.

### 5.3 Recruitment Identification Checks

All successful applicants must first meet the [NHS Employers' identity check standards](#) in order for Yewtree medical centre to continue with the remainder of the job role-specific checks before the commencement of employment.

### 5.4 Identification Badges

Yewtree medical centre will create and issue an identification badge or other media that bears the Practice name and/or logo (to be worn at all times while at work or on duty) that visibly states, from a personal distance, the staff member's:

- | Name
- | Job title or role

### 5.5 Visitors - Healthcare professionals, contractors, delivery drivers, etc.

Anyone visiting Yewtree medical centre for meetings, to carry out healthcare sessions or to carry out works etc, which involves going past the reception desk/waiting room and into the main body of the Practice, must sign in at the reception desk.

They may be expected and their names already supplied (and on a list at reception), but their identity must be checked and confirmed, and the form of ID provided noted by the reception team at front of house. It is perfectly acceptable to check with the visitor's organisation if there is any doubt - even if this causes a short delay. In some cases it may be that a trusted member of the Practice Team can verify a visitor's



identity - and for this to be noted as the ID verification - if this avoids any potential delay or other issue.



## 6. Definitions

### 6.1 Locum

- | A locum GP or nurse works in the place of the usual GP or nurse when they are absent, or when a hospital or practice is short staffed. These professionals are still governed by their respective regulatory bodies, despite the transient or freelance nature of their positions

### 6.2 NHS Smartcard

- | Smartcards enable NHS healthcare and contractor staff to access clinical and personal information appropriate to their role. A Smartcard requires the user to have an individual passcode to give them secure and auditable access to national and local NHS Spine enabled health record systems

### 6.3 PIN

- | Every person on the Nursing and Midwifery Council (NMC) register is given a unique registration code called a PIN. You can search for a person on the register and get the fastest, most accurate results when searching by PIN

### 6.4 National Performers List

- | Accessible via the internet, the National Performers List service allows members of the public to check the registration status of performers (GPs, opticians and dentists). It provides prospective performers with guidance on the documents they will need to apply for inclusion on the list, along with the relevant contact details for the Performer Administration team

### 6.5 Indemnity

- | Doctors and nurses must make sure they have adequate and appropriate insurance or indemnity arrangements in place, covering the full scope of their medical or nursing practice in the UK. The cover they need depends on their circumstances and must be in place by the time they begin to practise
- | From 1 April 2019, NHS Resolution operates a new state indemnity scheme for general practice in England called the Clinical Negligence Scheme for General Practice (CNSGP). The scheme covers clinical negligence liabilities arising in general practice in relation to incidents that occurred on or after 1 April 2019. CNSGP provides fully comprehensive indemnity for all claims within its scope



## Key Facts - Professionals

Professionals providing this service should be aware of the following:

- | Identification badges are to be worn at all times so that Patients know the name and role of the person they are dealing with, for security and customer care purposes
- | Visitors must be expected by Yewtree medical centre and identification verified by company ID or via a phone call to the company's office. ID should not be retained or copied but ID type may be noted in the visitors book
- | Every member of staff - whatever their role or qualifications, or whether they are permanent or temporary - must have undergone a full identity check prior to employment that complies with NHS Employers standards
- | All staff members applying for a Smartcard must meet the NHS Employers identification standards and will usually have a face-to-face interview with an external NHS Smartcard Registration Authority agent before a card and individual access code will be issued
- | When dealing with Patients and other people, either on the telephone or in correspondence of any kind (e.g. email, letter or text message), staff members must provide their name and role. This provides continuity, openness and a degree of responsibility and accountability that enhances the external user's experience of Yewtree medical centre



## Key Facts - People affected by the service

People affected by this service should be aware of the following:

- 1 When you visit your practice, or you are visited at home, you should be able to see the name of the person you are speaking to or dealing with and what they do as their job from a visible badge or other ID. Ideally, this will carry their photo as well. It is your right to ask to see photographic identification if you are unsure about the person in front of you. Most people who work in general practice have NHS Smartcards which carry their photo, so you can always ask to see this
- 1 When you receive a call or other communication from Yewtree medical centre (unless it is an information circular or appointment reminder), the person communicating should always provide their name and job title. It is your right to ask for this and for the staff member to provide their name and their role
- 1 The identity, qualifications and employment history of people working in Yewtree medical centre will have been checked for your safety with subsequent (or ongoing) checks carried out in respect of doctors and nurses. The NHS has a set of strict identification standards that must be met for everyone. All Practice staff will also have undergone a criminal records check. This also applies to locum doctors and nurses and temporary, non-clinical staff members. If a Practice is inspected by the CQC this is almost certainly one of the elements the inspectors will examine



## Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

### **Clinical Negligence Scheme for General Practice**

<https://resolution.nhs.uk/services/claims-management/clinical-schemes/general-practice-indemnity/clinical-negligence-scheme-for-general-practice/>

### **GMC - GP Revalidation**

<https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation>

### **NMC - Nurse Revalidation**

<http://revalidation.nmc.org.uk/welcome-to-revalidation/index.html>

GAB20 - Visitors Policy and Procedure



## Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- | The wide understanding of the policy is enabled by proactive use of the QCS App
- | Yewtree medical centre can produce and reproduce ID badges and other ID media in-house, in order to keep ID resources up-to-date with the current staff complement (including temporary staff)
- | Everyone in Yewtree medical centre uses their name and role to sign off letters, emails and any other communications. Where the writer is not available full-time and a response is required or a query may be raised, another staff member's name is provided, or the times in the week when the writer is available are included
- | All administrative staff members are cleared and competent to check and record the ID and credentials of locum staff - especially GPs and nurses - who may be called in at short notice or during unsocial hours
- | Practice ID media carry a recognisable photo of the bearer and the same photo is used in the Practice and on the website of Yewtree medical centre to identify all staff members and their respective roles
- | All members of the Practice Team are universally comfortable about asking (or challenging if necessary) visitors to Yewtree medical centre for their ID, because they understand the importance of checking this for safety and security purposes - and there is no complacent or lax approach as a result of this
- | Where a new member of staff has not worked in the NHS before, and has therefore applied for a Smartcard following appointment, Yewtree medical centre can demonstrate that the 'requested' ID photo was carried out at the time of recruitment rather than at the time of Smartcard request



## Forms

Currently there is no form attached to this policy.