Introduction

1. In the course of implementing OHSC initial card distribution in line with the Operating Protocols currently accessible on the Dept of Health website www.doh.gov.uk/occupationalhealth, it is apparent that each trust works in its own distinctive way. This is largely dictated by the size of the trust, the scale of the task, and the location of HR/medical staffing departments, OH units and the doctors themselves.

2. HR/OH operators, and in some cases PG Centre managers, therefore need to identify the best local trust arrangements for the collection and/or distribution of OH smart cards and publicise their procedures accordingly.

3. Action required

Trusts have sought further guidance centrally on this task, and I have drawn up some possibilities for local consideration, together with a sample letter (attached) which can be amended according to local circumstances. In doing so, the central project team has taken on board the following important considerations:

- HR and OH data entry should be conducted as soon as possible after receiving the cards from the issuing point (usually the postgraduate deanery office), and that priority is given to those doctors who may shortly be rotating to new trusts. Bulk data entry is facilitated by means of using the pre-set default PIN;

- the default PIN on the card must exchanged for a doctor’s personally selected PIN at the earliest opportunity, to maintain the security of the data, especially confidential OH clearance data;

- all doctors have a professional responsibility in accordance with clinical governance requirements to maintain their card securely and to keep their OH data up to date. Their clinical tutors and supervisors should make every effort to ensure they are able to be released from clinical duties or training to collect their card during the period of their employment in that trust;

- any cards which can't, in exceptional cases, be passed to the doctor in their current employment should not be posted “blank” to their home address but should instead be returned to the deanery for onward transmission, preferably with a note of their next placement;

- doctors transferring from training posts to NHS non-training posts can continue to use their cards, and so these should be distributed to them.

Security and disclosure

4. The OHSC scheme relies on a balance between the accessibility of the data held on the card or the central database and the security of the system. GMC guidelines contained in the Department of Health’s “blue book” for OH staff emphasise that: “Patients and Staff have the right to expect that OH professionals will not disclose any personal information that they learn during the course of their professional duties, unless you give your permission”.

5. This means that the distribution method for getting smart cards to the doctors must take this requirement into account. It means that if a doctor comes to HR to collect their card they will not be able to access their full OH details on-screen because the HR operator will rightly not have access. The only way they can see the information entered on the card before they receive that card is by requesting a printed copy in advance from their OH unit, and making the necessary arrangements for the security of the printed copy. This disclosure conforms to the provisions of the Data Protection Act 1998. Otherwise they can call at the OH unit holding the card to check this information on-screen.

6. Suggested options for card distribution and PIN changing in trusts
• If HR, the doctor and OH are all on site A, the doctor should be asked to call to validate data and change their PIN at either department. Any subsequent HR amendments can only be done at HR, and likewise OH amendments only done in OH.

• If HR is on Site A, the doctor works on site A, and OH on Site B, it is probably best if the card is returned after initial data entry from OH to HR in Site A for validation, PIN change and card collection.

• If HR is on Site A, and the doctor and OH are both on Site B, it is probably best if the card is retained by OH at Site B for collection, and HR is notified and asked to send out a letter, amended to request validation/PIN change and card collection in the OH dept.

• If HR is on Site A, OH on Site B, and the doctor on Site C, the doctor should still be asked to collect their card at the site of their choice. If exceptionally this proves impossible during the training rotation, and with the doctor’s express approval, they should be sent their card at a safe address with a request to validate and secure their personal and confidential data and change their PIN at either Site A or Site B at the earliest opportunity.

In all cases above, operators in HR and OH should take care to arrange for action to be completed ahead of any rotational changes and staff movement out of the trust.

7. Sample letter

Trusts should consider using a variant on the sample letter attached, having regard to the circumstances outlined in Paragraph 6 above, and deleting options as appropriate. If sending the card make sure you have the latest safe address possible. If notifying to collect the card, an internal address should suffice.

Barbara Levy
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Department of Health NHS Employment Policy Branch

October 2003
Sample letter

Date ..........

Dear Doctor

NHS Occupational Health Smart Card

I am holding * / sending you * your smart card, which contains your confidential Occupational Health data as supplied on your pre-employment health questionnaire together with related personal details. The key aim of the card is to hold this clearance data on your fitness to practise on a single, secure card to speed up induction processes as you move through the NHS for training or career purposes.

At present the card information is deemed insecure as it still contains the original default PIN setting, although nobody outside of Occupational Health other than yourself is able to access the OH information. It is therefore in your personal interest to call in to

   your HR/Medical Staffing Department or your Occupational Health department [word as necessary], at [site addresses as necessary]

   to validate */ to collect your card and validate * your data and select your personal PIN as soon as possible before you move onto another NHS trust to continue your medical training or take up new clinical duties.

It is your professional responsibility to hold your card secure and to keep all information up to date during your medical employment within the NHS.

Please ring me on xxxxxxx or xxxxxxxx (OH)* to arrange a convenient appointment. This should take just a few minutes of your time. Your medical director is aware of the OHSC project and has been asked to make sure clinical staff comply with this request.

Signed....

Trust OHSC operator (HR /medical staffing)