minutes v1.0

NHS National Services Scotland

CHI Management Board (CHIMB) Meeting
15 April 2025 at 10am via Microsoft Teams

Present:

Dr Tim Allison, Director of Public Health and Policy, NHS Highland [**Chair**]

Mr Jonathan Cameron, Deputy Director - Digital Health and Care, SG

Ms Nicki Fairweather, NHS National Services Scotland, CHI National User Group Member

Mr Steven Flockhart, Director Digital & Security & SIRO, Digital & Security (DaS), NHS National Services Scotland (NSS)

Mr Scott Heald, Director for Data & Digital Innovation and Head of Profession for Statistics, PHS

Mr John Jones, Senior Service Manager, NHS National Services Scotland

Ms Ava (Wenyan) Kong, Lay member.

Mrs Anneli Lyon, Statistician - Head of NHS Central Register for Scotland (NHSCR), National Records of Scotland (NRS)

Mr Stuart McPhail, Digital Health & Care Directorate, Scottish Government - deputy for E Beratarbide

Mr Martin Morrison, Associate Director– Practitioner Services **[Vice Chair]**

Mr Jonathan Ogunbusola, Lay Member

Dr Lindsey Ross, Primary Care Representative

Mr Euan Urquhart, Senior Information Governance Specialist & Deputy Data Protection Officer, Information Governance & Assurance Team, NHS Education for Scotland

Prof Seshadri Vasan, Director Research & Development and Deputy Caldicott Guardian, NHS Grampian

Mr Kevin Whiteford, Health Records Development Manager, NHS Ayrshire & Arran

Mr Iain Young, National Operations Manager, Practitioner Services

In attendance:

Ms Jenna Stone, NHS National Services Scotland, Committee Secretary

Part attendance:

Mr Dave Watson, Data Architect, Digital Office for Scottish Local Government

Mr Mike Crockart, ScotAccount Service Manager, SG

Mr Richard Dobbie, Information Consultant, PHS

Ms Ruth Griffith, Policy Manager – Digital Health and Care, COSLA

Mr Doug Kidd, Compliance Officer, NHS Education for Scotland (NES) Technology Service

Ms Yvonne Longwill, Digital Identity Local Government and Sponsorship Lead, SG

Mr Andy Malyon, National Clinical Lead, Scan for Safety, SG

Mr Paul Selfridge, Business Analyst, SG

Apologies:

Dr Elena Beratarbide, Head of Information Assurance & Risk, Digital Health & Care Directorate, Scottish Government (SG)

Ms Dianne Urquhart, Health Records Manager, NHS Greater Glasgow & Clyde

Dr James Ward, Scottish Association of Medical Directors Representative, Scottish Ambulance Service

1. Welcome and Introductions (Dr Allison)

Dr Allison welcomed all to the CHIMB and welcomed new lay member Ava (Wenyan) Kong, and Nicki Fairweather, from NSS who is also the CHI National User Group representative.

Prof Vasan noted a standing Declaration of Interest as a member of the Moderna Respiratory Portfolio Advisory Board.

Several housekeeping matters were highlighted, and permission granted to record the meeting. The apologies above were noted. Assurance was provided by the Committee Secretary that the meeting was quorate.

2. Use of CHI in Digital Front Door (DFD) (J Waldheim Ross, D Kidd)

This was being piloted in Lanarkshire.
Mr Waldheim Ross ran through an illustrative example, noting key components such as identity validation, visibility of appointments, communications, and data held in the health & care record. Currently it was only basic data (Name, Date of Birth and Address), but the aim was to incorporate additional information such as email and telephone number.

There were known issues, which would be incorporated into the formal Application:

(i)   Where individuals wished or needed to change their CHI number
- There was a need to ensure members of the public were aware this could not be changed in the app by updating their information.

(ii)   Access Management – eg death or dormancy of the user
- Discussion on information governance guidance on timeframes (eg how long after death /how long an account was dormant before individuals were asked to refresh authentication details).
- It was noted that only 80% had access. ScotAccount were pursuing ways to improve the identification verification process (which was often more challenging for younger people)
- It was also noted that there were geographical border issues – eg in Lanarkshire where this was being piloted, there were potential issues if an individual was registered with a GP practice that sat within another health board which was closer to them.

(iii)   Challenges to find a match.
*   The team were still seeking a solution to "fuzzy matching" (where there were challenges to ensure all the criteria enabled an exact match) and the need to ensure CHI data of an induvial matched with their ScotAccount ID, where a call out to retrieve health data for an individual may be required.   There was discussion on the process of using the CHI number as an identifier, and potential issues for individuals to access their ScotAccount.
*   There was discussion on how to verify or vouch for an individual in order to verify their identity – as responsibility for this should not lie with a GP. Scottish Government were exploring options and acknowledged that the ScotAccount was used across the public sector.
*   It was acknowledged that matching was a separate issue to identity verification.

It was noted the Application would need to be brought to a future CHIMB meeting for Decision - potentially in July, but if there was insufficient time to prepare the Application by then, this could be deferred to the October CHIMB meeting.

Action
20250415:01   Digital Front Door Application to be brought to July or October CHIMB meeting.

3.   **CHI in Local Government – Progress Update (R Griffith, R Dobbie)**

The slides were requested to be shared

It was reported that CHI Local Government discovery funding had been approved, but not yet released.

Colleagues emphasised the need to ensure the Information Governance was correct, and there was also a need to consider mandatory standards in the Care Reform (Scotland) Bill, and to ensure that the CHI LG fits with the England and Wales Roadmap.

The report had been issued following the NSS Development Day; and a further report would be issued following a workshop with Information Governance Colleagues.

The CHI in FhIR/UK Core Proposal would be developed for the DHAC meeting in June. A roadmap of timings was outlined.

A further progress report (or possibly a Decision Paper) would be provided at a future meeting (either July or October – to be confirmed).

Action
20250415:02   CHI LG. A further update would be brought to July or October CHIMB meeting.

4. **ScotAccount : Update on development of a new National Digital Platform (NDP) Application Programming Interface (API) (M Crockart, Y Longwill, P Selfridge)**

There was an overall 81% success rate for verification, using Experian which focussed on adults to match Date of Birth and Address:

However, verification failure rates were much higher for younger people under 18 who may not have a mortgage, driving licences, or be on the electoral role etc.

It was also noted that there were issues for identity checks (eg fake IDs used for someone who had passed away)

It was agreed for a further update to be provided at the July CHIMB Meeting.

The slides were shared post-meeting.

Action
20250415:03 **Scot Account - A further update would be brought to July CHIMB meeting.**

5. **Update on finalising Scan for Safety DPIA (A Malyon / S McPhail)**

It was important that individuals with registered devices could be contacted in case of emergencies, especially if the device needed to be recalled.

There was discussion on private sector implants and how CHI information is accessed by private sector in relation to devices.

Advice provided by CLO indicated that this is not an issue if CHIMB was satisfied the access is proportionate – ie there is a very narrow parameterised integration – and there must be an exact match (no fuzzy matching). There was a discussion on the process of next steps in the event of failure to obtain an exact match. M Morrison noted this would require a back-office process through I Young's team.

There was discussion on the difference between cosmetic procedures and non-cosmetic procedures for implanted devices. It was noted that the volume of implanted devices for cosmetic procedures was substantially higher in the private sector.

Two Recommendations were agreed

- Recommendation 1 – once it had been determined if system to system access was required, proportionate access should be permitted, only in circumstances of an exact match, through the interface.
- Recommendation 2 – in consideration of the 3 options for monitoring and ensuring access is used appropriately, as an audit function, it was agreed that Option 1 was preferred – *"on a periodic basis, NSS Practitioner Services select a sample of audit trail records of CHI searches executed by approved private health care provider systems (this would be sourced from NES), and request the SfS team to confirm that these patients have a record in the SfS system (there may be a time delay between the search and the data being in the SfS system)".* If there were no discrepancies,

access could be approved. It was noted that the system could flag if the private sector were submitting searches without any patients being identified, which provided an audit assurance.

- Recommendation 4 - It was noted that CHI would add to any existing data sharing agreement with third party providers. M Morrison noted his colleagues were working to add a patch to existing data sharing agreements.
- Recommendation 3 - Seek information from NES on what security controls can be implemented on the FHIR interface to manage authorised access over the public internet. This recommendation was to be taken forward by M Morrison outside the meeting.

Action
20250415:04   M Morrison to take forward all four SfS recommendations.

6. **CHI Numbering Pool Extension (M Morrison)**

M Morrison noted that there was a need to increase the number of CHI numbers available, due to the custom and practice to use 01-01-YY when a Date of Birth is not known. The intention was to move away from the current format, to a different numbering system which would not contain Date of Birth or gender specific details.

There was a discussion on two options based on introduction of a different check digit (modulus 10 and modulus 11). It was noted that other systems may not be able to use the 11 digit system, and there were also algorithm challenges.

Due to a low level of responses received to the survey, the team would need to seek further responses, which would provide an opportunity for responders to indicate how changing the CHI numbering system would impact them.

Recommendation 1. It was agreed that option 1 was the preferred option (using modulus 10 check digit, in addition to a modulus 11 check digit), which would double the number of CHI numbers available.

Recommendation 2.   It was agreed that the target date by which the CHI number pool would be extended, and the date that any system that uses check digit validation must update their system would be 1 November 2025.

Recommendation 3 – M Morrison / I Young would instruct NSS Practitioner Services to raise the required change request with the CHI System Supplier.

Recommendation 4 - To agree a communications plan for all users of CHI Data. J Cameron offered to put this through DHAC to help strengthen the message and highlight the importance. It was agreed that wide communication was needed. Progress will be confirmed at the next CHIMB meeting.

Actions
20250415:05a   Recommendation 1. Preferred Option 1 agreed: to use modulus 10 check digit, in addition to a modulus 11 check digit, which should be in place by 1 November.
20250415:05b   Recommendation 2. Target date for the CHI number pool to be extended was agreed as 1 November 2025.

| 20250415:05c | Recommendation 3. M Morrison/I Young to instruct NSS Practitioner Services to raise the required change request with the CHI System Supplier. |
| 20250415:05d | Recommendation 4: communication plan progress to be confirmed at the next meeting |

7. National User Group update (K Whiteford)

K Whiteford noted there had been 2 meetings (January and March 2025). The performance of the app was good, the test environment had been rebuilt. Users were testing a new Child Health product and looking at a number of defects. The CHI database had been configured. Their next meeting would be on 21 May.

It was agreed for a further update at the next CHIMB meeting in July

20250415:06   National User Group update to be added to July CHIMB Meeting.

8. NES Quarterly Report (for information)

D Kidd noted no changes, and the report was noted for information.

9. New Applications – none

10. Homologation of Chair/Vice Chair Responses

(i)   23-02 National Laboratory Information Management System Laboratory Programme DPIA Approval

(ii)   25-01 Public Health Approach to Learning (PHAL) Dashboard.

The Members were content with the homologation.

11. CHI Related Governance Arrangements

(i)   Gender Issues

It was acknowledged that there was scope for considering a person's sex assignment at birth and a person's identified gender.

This would be discussed by J Cameron and the Data Board

Following discussion, and reference to the Supreme Court Ruling, it was acknowledged this was wider than CHI and needed to be connected with other areas. It was agreed this should be a substantive item on the July CHIMB Meeting agenda. The papers to be provided should focus on clinical benefits, safety and getting the priorities right for the population. T Allison would feedback to N Steedman

(ii)   Risk Management

Risk management was not considered separately and will be consider at future meetings.

(iii)   Agenda Planning

This would be brought forward to be discussed by E Beratarbide.

(iv)   Next CHIMB Chair

T Allison confirmed that Emilia Crighton would take on the Chair of CHIMB, and he would liaise with her prior to his retirement in June.

A Ferguson would liaise with E Crighton to confirm she could attend the future dates of the CHIMB in July and October

20250415:07   Gender. To be discussed at the July CHIMB meeting.
20250415:08   Agenda Planning to be added to the July CHIMB Meeting for E Beratarbide
20250415:09   CHIMB Secretariat to liaise with the new Chair E Crighton

12.   Minutes of the 21 January 2025 Meeting and Action Updates

The minutes from 21 January 2025 were approved without amendment. All actions from the last meeting had been completed or were on the agenda.

13.   Matters Arising (not on the agenda)

Items 14-17 for information

14.   Feedback from Public Benefit and Privacy Panel
15.   Feedback from Scottish Caldicott Guardian Forum
16.   Feedback from UK Council of Caldicott Guardians
17.   Feedback from NHSCR Stakeholder Reference Group

18.   Any Other Business

M Morrison gave thanks to T Allison for his tenure as Chair of CHIAG and CHIMB. T Allison thanked colleagues and acknowledged the support provided by A Ferguson as Committee Secretary.

19.   Date of Next Meeting

Tuesday 22 July 2025 (10-12pm) via Microsoft Teams. (Post meeting: The forward schedule of CHIMB meeting dates for the remainder of the year would be amended to align with the availability of the new Chair).