

minutes v1.0

National Committee
Services
Finance, Corporate Governance
and Legal Services
Gyle Square
1 South Gyle Crescent
Edinburgh
EH12 9EB



CHI Management Board (CHIMB) Meeting 17 July 2025 at 10am via Microsoft Teams

Present:

Dr Emilia Crighton, Director of Public Health, NHS Greater Glasgow & Clyde **[Chair]**

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

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

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

Dr Toni Jambozova, Principal Information Analyst. CHI Linkage and Indexing (CHILI), Public Health Scotland (PHS)

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

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

Ms Nicki Monteith, NHS National Services Scotland, CHI National User Group (NUG) Member

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

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 Iain Young, National Operations Manager, Practitioner Services

In attendance:

Ms Anne Ferguson, Committee Secretary, NSS

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

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 Caroline Ellis, Head of Data Acquisition, Engineering and Linkage, Scotland's Census 2031, NRS

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

Mr William Howes, Characteristics Team, Scotland's Census 2031, NRS

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

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

Mr Mike Reynolds, Product Owner, SG

Ms Bev Wayne, Programme Director, Digital and Security, (DaS), NHS National Services Scotland (NSS)

Mr Jonathon Wroth-Smith, Director of Census Statistics, NRS

Ms Lisa Young, Project Manager, DaS, NSS

Apologies:

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

Ms Ava (Wenyan) Kong, Lay Member.

Mr Jonathan Ogunbusola, Lay Member

Dr Lindsey Ross, Primary Care Representative

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

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 (E Crighton)

E Crighton welcomed all to the meeting, introductions were made and apologies noted.

2. NRS CHI Access Protocol Change (J Wroth-Smith, W Howes, C Ellis)

The CHIMB had initially been asked to approve a change to the NRS CHI Access Protocol. However, on further clarification from PHS it was apparent that a change to this protocol was not required. Instead, the CHIMB were asked to approve NRS access to CHI data for the following purposes:

- To enable the data to be used in the production of demographic statistics by combining administrative, survey and census data. These would be statistical products.
- To investigate whether characteristics estimates of the population, for example for ethnicity, can also be produced using administrative data.
- To improve the quality and accuracy of Scotland's Census 2031.

The CHIMB supported NRS access for these purposes and approval granted.

3. Use of CHI for Special Requirements (B Wayne, L Young)

A short presentation was given detailing a list of new data items relating to special characteristics that had been identified for central storage and use by the wider health and care services. The CHIMB discussed whether the CHI platform was a suitable repository to store the master patient index. The following points were noted:

- The data stored in CHI was held to fulfil the statutory obligation stated in the 1978 Scotland Act and GMS Regulations which was to maintain a list of patients. This was for administrative rather than clinical purposes. Extending the data held in CHI for clinical purposes was beyond the current scope of CHI and so it was recommended to seek legal advice in this regard if the CHI platform was deemed the correct central repository.
- Consideration also needed to be given to the technical architecture and management of the special characteristics data including an understanding of the full data lineage. Onward management of this data was important as data conflicts were inevitable.
- A decision about where this data was held was out with the remit of the CHIMB. This matter was therefore to be referred to the National Technical Design Authority chaired by J Cameron.

ACTION

250717:01 J Cameron and S Flockhart to assist B Wayne in producing a paper for the next National Technical Design Authority meeting in August to consider the implications of where the special characteristics data was mastered and maintained.

4. CHI in Local Government – Progress Update (R Griffith, D Watson, R Dobbie)

Funding had now been received from the Scottish Government for this work and a team mapped out to lead it. The first appointment made was for an Information Governance Lead starting on 18 August. The remaining team positions were about to be advertised and would be filled as soon as possible.

In the meantime, preparatory work was underway to mobilise the team. This included the development of a NDP API. A fuller update would be provided at the October meeting to ensure both timelines and actions were aligned with those of the CHIMB.

ACTION

250717:02 CHI in Local Government to be included on the October agenda

5. Gender Issues (E Crighton, M Morrison, I Young)

The CHIMB discussed the implications of the Supreme Court Ruling on interpretation of sex within the Equality Act 2020 and review of data statistics research on sex and gender report particularly recommendation 12. The options for recording sex/gender in CHI outlined in paper CHIMB/25/36 were considered to determine how best to comply with the law. The preferred option of the CHIMB was 'Scenario C – record sex and gender in separate data fields' as this was the most resilient option and thought future proofed to comply with future legislation changes.

It was agreed that a paper would be developed by M Morrison, I Young and E Beratarbide to:

- better understand the risks (particularly legal, clinical and technical risks) of separately recording sex and gender on connected NHS systems
- detail a transition plan

The importance of a co-ordinated approach to this work was noted. E Beratarbide agreed to consider whether assistance was required from other SG colleagues.

ACTION

250717:03 M Morrison, I Young and E Beratarbide to produce a paper for a future CHIMB meeting detailing the risks associated with separately recording sex and gender. A transition plan was also to be included.

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

A short presentation was given outlining the purpose of this work and progress made in developing a new API for verification purposes. Work in the test environment was proceeding well. Markers had been identified which indicated that records had been created at birth. This provided a high level of trust that it related to a real person and not a synthetic identity. Discussions had taken place and data elements of interest agreed. By the next CHIMB, information should be available on the success rates and approval sought as to whether this project could proceed on that basis.

ACTION

250717:04 ScotAccount to be discussed at the next CHIMB meeting in October.

7. Update on finalising Scan for Safety (SfS) Data Protection Impact Assessment (DPIA) (M Morrison, E Beratarbide, A Malyon)

The recommendations approved at the last meeting included development of a Data Sharing Agreement (DSA) between NHS Scotland and private healthcare providers covering CHI access. Details to be included were audit rights and assurance that access to CHI was appropriate. Since the last CHIMB meeting, Central Legal Office (CLO) meetings had taken place and the DPIA that existed between the SfS repository and Health Boards reviewed. CLO were developing the additional part of the DSA for third party providers. This was expected to be completed by September 2025.

The first application from a private healthcare provider was likely to be submitted in October or November through the usual CHI application process. If approved, a DSA specifically for third party commercial private sector access with additional obligations and scrutiny would be arranged.

8. CHI Numbering Pool Extension Update (M Morrison)

The CHIMB approved the Situation, Background, Assessment and Recommendation (SBAR) Report to implement a modulus 10 algorithm check digit at the last meeting when all modulus 11 algorithm check digits for a particular date had been used. A communication was sent to all Health Boards and users via the CHI NUG. A questionnaire was also subsequently issued seeking information about the approach for implementation of modulus 10 in national systems. 60% of the 27 responses received so far were going to do nothing. Of the remaining 40%, nearly all were to add modulus 10 validation rather than remove modulus 11 validation, but all noted issues in achieving the target date agreed of 1 November 2025. Numbers involved were small; there had only been six dates of birth which had run out of CHI numbers.

The CHIMB discussed whether the target date should be changed. The CHIMB was content to proceed with the original target date of 1 November as there would be no additional benefit achieved by its delay. Risks were to be managed through the NUG, and a record kept of systems that could not accept the new modulus 10 numbers from 1 November.

9. National User Group update (N Monteith)

The next CHI NUG meeting was on 23 July 2025.

The minutes from the previous meeting on 21 May had been circulated. Highlights from the discussion included the date of birth issue detailed in the item above and a way forward for the replacement of CHI Extensible Markup Language (XML). Members were invited to ask questions on the minutes circulated but none were raised.

10. NES Quarterly Report (D Kidd)

This was the first report that included third-party products using the NDP demographics service. When asked, members agreed that visibility of third-party products where NES was providing access to the NDP demographics service was useful so would continue in future reports. The Digital Front Door (DFD) CHI application was submitted and had been circulated for comment to members. This completed action 1 from the April meeting.

ACTION

250717:05 D Kidd to include third-party products using the NDP demographic service in future quarterly reports.

11. New Applications (E Crighton)

Although there were no new applications to consider at this meeting, members were reminded to submit responses for the DFD application by 28 July 2025.

ACTION

250717:06 CHIMB members to submit responses for the DFD application by 28 July 2025

12. Homologation of Chair/Vice Chair Responses (M Morrison)

An issue had arisen with the Laboratory Information Management System (LIMS) approval homologated at the last meeting. It had been identified during further discussion by the LIMS project team, that Amazon Web Services (AWS) had been omitted as a data processor from the original application. T Allison and M Morrison had also discussed the encryption keys with the applicant and established that the third-party software supplier rather than AWS decrypted the data. It was noted that there was no need for a revised application to be submitted to the CHIMB.

13. CHI Related Governance Arrangements

a. Risk Management (M Morrison)

Work was ongoing to provide the CHIMB with continued assurance that the hazards and risks identified from the Clinical Safety Case (CSC) carried out during the new CHI programme remained within an acceptable tolerance level or improvement action that had reduced the risk. The Practitioner Services' Medical Quality Assurance Manager had mapped these items from the CSC into a series of controls as part of the internal audit programme. An update was to be provided on these audit programmes at each CHIMB meeting going forward to provide the necessary assurance.

ACTION

250717:07 M Morrison to provide assurance using data from Practitioner Services' Internal Audits on the CSC hazards and risks identified for the new CHI programme at each meeting going forward

b. Agenda Planning/Format (E Beratarbide)

The CHIMB discussed how to make better use of the limited meeting time available. It was agreed to focus on strategic discussions and delegate operational aspects. E Beratarbide, M Morrison and E Crighton agreed to work on reformatting the agenda for future meetings to strengthen its ability to enable strategic discussions.

250717:08 E Beratarbide, M Morrison and E Crighton to reformat the agenda for future CHIMB meetings

14. Minutes of the 15 April 2025 Meeting and Action Updates

The minutes from 15 April 2025 were approved without amendment. All actions from the last meeting had been completed or were being progressed.

15. Matters Arising (not on the agenda)

There were no matters arising raised.

Items 16-19 for information

- 16. Feedback from Public Benefit and Privacy Panel**
- 17. Feedback from Scottish Caldicott Guardian Forum**
- 18. Feedback from UK Council of Caldicott Guardians**
- 19. Feedback from NHSCR Stakeholder Reference Group**

- 20. Any Other Business**

Chief Medical Officer (CMO) letter from 2011 (M Morrison) – It was noted that T Allison had requested an updated CMO letter detailing CHI governance arrangements, but it had not been forthcoming. J Cameron to discuss this matter with M Morrison out with the meeting and ensure the updating of this letter was prioritised within SG.

ACTION

250717:09 J Cameron to discuss the outdated CMO letter from 2011 detailing CHI governance arrangements with M Morrison and ensure an update was prioritised within SG

- 21. Date of Next Meeting**

Tuesday 21 October 2025 (10-12pm) via Microsoft Teams.