

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 21 October 2025 at 10am via Microsoft Teams

Present:

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

Mr John Jones, Senior Service Manager, NHS National Services Scotland (NSS)

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

Mr Stuart McPhail, Head of Information Assurance, Digital Health & Care, SG

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

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

Ms Eleanor Rideout, Information Governance Lead for Local Authorities

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 Anne Ferguson, Committee Secretary, NSS

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

Part attendance:

Dr Carmen Amador, Head of Data Linkage, National Records of Scotland

Ms Jo Bruce, Interim Chief Data Officer, Research Data Scotland

Mr Mike Crockart, ScotAccount Service Manager, SG

Mr Richard Dobbie, Information Consultant, PHS

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

Dr Toni Jambazova, Principal Information Analyst, CHI Linkage and Indexing (CHILI)

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

Ms Carole Morris, Head of Data and Modelling Services, Data and Digital Innovation, Public Health Scotland

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

Apologies:

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)

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

Mr Jonathan Ogunbusola, Lay Member

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 Apologies (E Crighton)

E Crighton welcomed all to the meeting particularly E Rideout attending for the first time. Introductions were made and apologies noted. No interests were declared.

2. Request to Update CHIMB-NRS Memorandum of Understanding [MoU] (C Morris, C Amador, J Bruce)

The CHIMB were asked to approve an update to the NRS-CHIMB MoU for the following reasons:

- Permit NRS to use CHI for proactive indexing of health datasets for ingestion into the Scottish National Safe Haven [NSH] (supported by processing agreements between NRS and the data controller)
- Acknowledge that NHS Scotland Data Controllers can approve onward data use via mechanisms such as the Researcher Access Service Approval Panel, not solely through Health and Social Care Public Benefit and Privacy Panel (HSC-PBPP)
- So that, data can be readily indexed and linkable in the NSH when researchers receive approval

Although the CHIMB needed to approve the mechanism to enable these changes, it wasn't responsible for research. It was therefore recommended that formal endorsement of this approach be obtained from the HSC-PBPP before approving changes to the MoU. A copy of the existing MoU together with the presentation slides were to be circulated for information.

There were no urgent linkage requests known at present, so it was decided to revisit approving the updated CHIMB-NRS MoU at the next meeting. This would give time for the HSC-PBPP to be fully briefed, and the proposal endorsed.

Actions

- 251021:01 C Morris to seek endorsement of proposed changes to the CHIMB-NRS MoU from HSC-PBPP to enable the CHIMB to approve the updated document at the next meeting**
- 251021:02 C Amador/A Ferguson to share the existing CHIMB-NRS MoU and presentation slides with members**
- 251021:03 A Ferguson to include 'Request to Update the CHIMB-NRS MoU' on the agenda for 13 January 2026 provided PBPP endorsement received**

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

A verbal update on the CHI in Local Government programme was provided by R Griffith and the following points noted:

- The recruitment of posts to support this programme was taking longer than expected although recruitment of the Programme Manager post was now underway
- EquipU which provided and maintained assistive technologies for vulnerable citizens across council partners in the NHS Greater Glasgow and Clyde area had approached the team about using CHI to speed up work processes. Discussions were ongoing and the approach used would be mirrored elsewhere.
- There was also work being done involving Aberdeen City Marmot sites to predict service development particularly around health inequalities.
- Opportunities had emerged from data sharing synergies around telecare and equipment. Similar information patterns had emerged which may be beneficial if carried forward into Digital Front Door.
- Eleanor Rideout would provide updates on the CHI in Local Government Programme at future CHIMB meetings

ACTION

- 251021:04 E Rideout to provide updates on the CHI in Local Government Programme at future CHIMB meetings**

4. ScotAccount and NSS Application Programming Interface (API) Proof of Concept (M Crockart, Y Longwill)

A written updated had been circulated prior to the meeting. The programme team were waiting on the API being delivered which was expected on 3 November. Y Longwill would provide future updates as M Crockart was moving on.

ACTION

- 251021:05 Y Longwill to provide an update on 'ScotAccount and NSS API Proof of Concept' at the January meeting**

5. Proposed PHS CHI Access Protocol Renewal (T Jambazova)

Key changes proposed to the PHS-CHI Access Protocol for 2025-2030 were outlined as follows:

- Structure and Language
 - Sections reorganised and new headings introduced to make the document easier to navigate and understand
 - Improved readability throughout the protocol
- Transparency
 - Added background context on key areas of PHS work and how CHI data supported these activities
 - New Section on PHS policy for reporting adverse events included
 - Visual diagram of CHI data flows expanded to provide a clearer, more detailed view of how CHI data was used across PHS products
- Roles and responsibilities
 - Expanded and distinguished roles and responsibilities, particularly differentiating the roles of PHS as data processors from the role of DaS in maintenance.
- Data Use Review
 - Data Use Section updated and revised to reflect current practice

The new structure was well received but the narrative of section 5.7 particularly 5.7.3 was to be revised to remove reference to work that did not involve PHS but took place between two NRS teams that was documented in the NHSCR CHI Access Protocol. A Lyon agreed to provide the necessary amendments and enable the PHS CHI Access protocol to be updated.

It was noted that Appendix 2 - Guidance on Communication with the CHIMB was blank. It was anticipated that this would be populated with information from the CHIMB Chair and/or Vice Chair. Alternatively, Appendix 2 could be removed if deemed unnecessary.

Action

- 251021:06 A Lyon to formally request a change to the wording of the PHS CHI Access Protocol under section 5.7 particularly 5.7.3 relating the Quarterly Extract for the NRS Population Spine. Signpost that this quarterly update was provided to NRS directly by NHSCR under the NHSCR CHI Access Protocol**
- 251021:07 T Jambazova to update the PHS CHI Access Protocol as per action 251021:06 above and submit it to the CHIMB Committee Secretary for circulation and approval by the CHIMB**

6. CHI Interface Strategy (M Morrison)

M Morrison explained that the CHI Programme Board had made a number of decisions about how data interfaced in future. CHI Extensible Markup Language (CHI-XML) and the Daily Broadcast relied on legacy technology and were broadcasting more information than required which did not comply with good

practice. The CHI Programme Board had therefore decided to migrate CHI-XML to Fast Healthcare Interoperability Resources (FHIR) by March 2026. A replacement for daily broadcast files was also to be implemented by the March 26 deadline.

The lack of progress system-wide to move from legacy interfaces now posed a risk to the ability of CHI to support other programmes, and hold and share new data, including, critically, a likely legal requirement to record and share data on gender separately from sex.

The CHI Management Board was asked for a decision on each of the points below:

- i) Consider extension of the end-of-life date for CHI-XML to allow work to be progressed both by the NES Technology Service but more generally by the NHS Scotland and other users integrated to CHI to plan migration from CHI-XML to FHIR – The CHIMB to agree an end-of-life date for CHI-XML in due course
- ii) Request that NES Technology Service developed a roadmap for the implementation of the read only and read/write FHIR service and present that to CHI Management Board at its next meeting in January 2026 - agreed
- iii) Request that NSS Digital & Security progress the options for Daily Broadcast File replacement to a conclusion with a proposal for a replacement to be decided at the CHI Management Board in January 2026 - agreed
- iv) Agree that if new data items were required to be shared on interfaces before the availability a DBF replacement, then these data items were to be made available only on CHI-XML as an interim solution. This approach recognised the risks and costs associated with changing the exiting Daily Broadcast Files - agreed
- v) That Scottish Government Digital Health and Care was to be asked to fund a programme which would move all legacy CHI interfaces and all legacy CHI interface users to the new strategic interfaces - agreed

Action

- 251021:08 The CHIMB to agree an end-of-life date for CHI-XML in due course**
- 251021:09 NES Technology Service to develop a roadmap for the implementation of the read only and read/write FHIR service and present that to the CHI Management Board at its next meeting in January 2026**
- 251021:10 NSS Digital & Security to progress the options for Daily Broadcast File replacement to a conclusion with a proposal for a replacement to be decided at the CHI Management Board in January 2026**
- 251021:11 Martin Morrison to ask Scottish Government Digital Health and Care to fund a programme which would move all legacy CHI interfaces and all legacy CHI interface users to the new strategic interfaces.**

7. High Level Plan for Implementing Separate Data Fields for Sex and Gender (M Morrison, I Young)

The CHIMB requested a paper at the last meeting outlining the risks associated with recording sex and gender separately as well as a transition plan. This paper was circulated prior to this meeting (CHIMB/25/40) and recommended a two-stage programme:

Part 1 – update CHI records to reflect sex at birth

Part 2 – add gender as a separate field

Practitioner Services was carrying out a review of the number of CHI that had been updated to reflect changes to gender. This work was due to conclude in November, after which information on the volume of work required would be available. The work involved to reverse CHI records to the birth sex and create a new gender field was not underestimated and extremely complex. The paper provided an early indication to Digital Health and Care that a funded discovery programme would be required to assess the impact and produce a business case for this to be achieved and comply with the Law. Further funding would be required to action the national programme of work.

This plan had both technical and clinical risks associated. However, decisions about future changes and/or the recording of patient sex/gender data on CHI could not be confirmed until the Equality and Human Rights Commission's updated Statutory Code of Practice was published in November 2025. Nevertheless, the CHIMB agreed to the decoupling of sex and gender elements in principle.

The process for requesting a gender change was still available to patients. M Morrison was therefore asked to seek advice from Central Legal Office about whether it should be switched off immediately.

Actions

- 251021:12 I Young to provide information on the volume of CHI that had been updated to reflect changes to gender once work concluded at the end of November.**
- 251021:13 M Morrison to ask SG Digital Health and Care Directorate to fund a discovery programme to assess the impact and produce a business case to comply with the Law.**
- 251021:14 The CHIMB to make decisions about future changes and/or the recording of patient sex/gender data on CHI following publication of the Equality and Human Rights Commission's updated Statutory Code of Practice expected in November 2025**
- 251021:15 M Morrison to seek advice from Central Legal Office about whether the process for requesting a gender change in CHI should be switched off immediately**

8. **Update on Modulus 10 Check Digit Implementation and Recommendation from CHI National Users Group (M Morrison)**

M Morrison reminded members that the CHIMB had agreed in April 2025 to the deployment of CHI numbers with Modulus 10 check digits from 1 November 2025. This date was reviewed by the CHIMB in July with no amendment at that time.

An up-to-date readiness assessment of systems to implement this change had been submitted for consideration. M Morrison on behalf of the CHI National Users Group asked the CHIMB to make decisions on each of the points below:

- i) Whether to move the implementation date from 1st November 2025.

The main concern was that Trakcare and its downstream systems had not completed the work necessary to enable use of CHI numbers with Modulus 10 check digits. A balance was required between service readiness and workarounds. As Trakcare was a critical clinical system there was a clinical risk if Trakcare and its downstream systems were not ready. It was therefore agreed to extend the implementation date.

- ii) If the implementation date was to be moved, then what new implementation date should be set?

It was essential that decisions taken by the CHIMB did not derail readiness. It was therefore decided to allow a short extension which would give Trakcare users more time to update systems whilst maintaining the momentum of completing the necessary work. The new implementation date for deployment of CHI numbers with Modulus 10-digit checks was agreed as 1 February 2026.

M Morrison was asked to provide a further systems readiness assessment for use of CHI numbers with Modulus 10 check digits for the extended date of 1 February 2026. Additionally, M Morrison was asked to assess the clinical risk and delivery of healthcare for those with no CHI.

- iii) If another approach should be taken to funding changes?

Boards with commercial suppliers had indicated difficulties in funding the system changes required to implement CHI numbers with Modulus 10 digit checks. The amount required was estimated at £300-400k. M Morrison was asked to escalate this issue to Jonathan Cameron and seek additional funding.

- iv) Specifically, in the TrakCare engagement, the CHI NUG asked if CHI Management Board would support a more national approach to managing change, led by NSS rather than each NHS Board engaging with TrakCare on a one-to-one basis.

Given the consequence of Trakcare on clinical care, the CHIMB recommended that a more direct approach should be taken in its management with NSS having a national co-ordinating role.

- v) What further communications and escalation is required in order that this change is given due priority by systems and organisations using CHI data.

It was agreed that M Morrison would draft a letter on behalf of the CHIMB Chair to eHealth Directors to highlight the importance of systems being ready to implement CHI Modulus 10 check digits by 1 February 2026

Actions

- 251021:16 M Morrison to assess the readiness of systems to use CHI numbers with Modulus 10 check digits by the extended date of 1 February 2026**
- 251021:17 M Morrison to assess the clinical risk and delivery of healthcare for those with no CHI**
- 251021:18 M Morrison to escalate to Jonathan Cameron the issue that boards with commercial suppliers were unable to fund the Modulus 10 change and seek additional funding**
- 251021:19 M Morrison to arrange for NSS to take a more direct approach to Trakcare management**
- 251021:20 M Morrison to draft a letter on behalf of the CHIMB Chair to eHealth Directors to highlight the importance of systems being ready to implement CHI modulus 10 check digits by 1 February 2026**

9. National User Group update (K Whiteford)

The minutes from the previous meetings on 23 July and 25 September were circulated in advance of the meeting. K Whiteford gave an overview of these discussions as well as that from an additional October meeting that primarily focussed on issues around Modulus 10. Key areas of discussion from the October meeting were –

- Agreement on a way forward for Trakcare and Simple Code
- Funding barriers
- Workarounds (unsustainable in the long term)
- Recommendation to ask the CHIMB for a delay in implementation of Modulus 10 from 1 November to allow systems to progress/align and thereby reduce reliance on workarounds
- Extension of the CHI-XML deadline
- Supreme Court Ruling

Members were invited to ask questions, but none were raised.

10. NES Quarterly Report (D Kidd)

There was no significant change in access or use of CHI in the last quarter or expected next quarter for NES managed and hosted applications. There were also no third-party applications going live through the FHIR interface.

For awareness, D Kidd explained that Digital Front Door had been rebranded MyCare.scot and was going live in December 2025. The initial roll-out was limited to dermatology patients within NHS Lanarkshire so no significant impact on the CHI service was expected. However, the First Minister had recently announced that MyCare.scot was to be available to all NHS Scotland patients from April 2026 which may have an impact. D Kidd agreed to work with M Morrison and I Young to ensure new CHI was not destabilised from a surge in activity following the launch of MyCare.scot. M Morrison highlighted that a risk had been added to the Practitioner Services Primary and Community Care risk register in this regard with initial mitigating actions documented. It was important to co-ordinate and manage both the impact on CHI and MyCare.scot user experience particularly in April 2026. A report on the impact on new CHI from additional CHI matching activity following the launch of MyCare.scot in December was requested for the January meeting.

ACTION

- 251021:21 NES Technology Service to work with NSS colleagues to ensure new CHI was not destabilised from a surge in activity following the launch of MyCare.Scot**
- 251021:22 Doug Kidd/Martin Morrison/ Iain Young to co-ordinate and manage the impact on CHI and MyCare.scot user experience particularly in April 2026**
- 251021:23 Doug Kidd/Martin Morrison to report on the impact on new CHI from additional CHI matching activity following the launch of MyCare.scot in NHS Lanarkshire in December at the January meeting**

11. New Applications (E Crighton)

There were no new applications to consider at this meeting.

12. Updated CHI Applications

i. Digital Front Door ref 25-02 (D Kidd)

The Digital Front Door (aka MyCare.scot) application had been updated with the process for handling CHI number changes using the NSS CHI broadcast service whilst maintaining the link between ScotAccount ID and the CHI number. This amendment addressed a query raised during the CHIMB review of the original application.

It was noted that NES was looking to develop a process usable by broader NES datasets and applications to handle CHI number changes. As NES did not currently have permission to use the broadcast file for this purpose, another application was being drafted which would be submitted for approval in due course.

13. CHI Related Governance Arrangements

i. CHI Audit and Assurance (M Morrison)

M Morrison provided some background to this item explaining that at the end of the new CHI programme, a Clinical Safety Case (CSC) was presented. This was accepted by and handed over to the CHIMB. There was a documented range of hazards within the CHI operating environment. The controls within the CSC were mapped to an internal control framework for audit within Practitioner Services. Going forward assurance reports would be provided to the CHIMB that the controls documented within the CSC were operating within tolerance levels.

The level of detail to be reported to the CHIMB going forward was discussed. It was agreed that a quarterly summary report would be sufficient detailing the red, amber and green status of controls audited together with the plan to mitigate any red controls.

ACTION

250717:07 M Morrison to provide a quarterly CHI Audit and Assurance Summary Report detailing the red, amber and green status of controls audited. A plan for mitigation of red controls was to be included.

14. Minutes of the 17 July 2025 Meeting and Action Updates

The minutes from 17 July 2025 were approved without amendment.

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

There was no other business discussed.

21. Date of Next Meeting

Tuesday 13 January 2026 (10-12pm) via Microsoft Teams.