Patient confidentiality, use of CHI and Counter-Fraud Services

Background
In 2013 the Chair of the Community Health Index Advisory Group met with NHS Counter Fraud Services (CFS) to discuss patient confidentiality and the use of CHI in its work.

CFS’ role is to provide NHS Scotland with a comprehensive counter fraud service through the prevention, detection and investigation of fraud and other irregularities against the health service. Working in partnership with all of the NHS in Scotland, its ultimate aim is to support and improve services, ensuring that money is deployed for the public good, in the effective delivery of frontline care.

NSS DPA Policy states:-
NSS uses patient and donor data for a variety of administrative, research and medical purposes. In addition, NSS needs to collect, process and keep a variety of sensitive and personal data about people in order to carry out its functions as a public authority and perform business operations in support of these. This includes data on employees, suppliers, contractors, donors, patients, clients/customers and others with whom it communicates. The aim of the policy is to help ensure that all such personal data is dealt with lawfully, properly and securely no matter how it is collected, recorded and used – whether on paper, on electronic devices such as a computer or laptop, or recorded in other ways. CFS comply with this policy at all times. For more information see https://nhsnss.org/services/counter-fraud/data-protection/

Use of CHI for entitlement
CHI guidance states that: ‘The CHI number has no role in entitlement to care, and is not used within NHS Scotland as evidence of an entitlement to NHS care. Its purpose is to positively identify an individual for NHS Scotland business purposes’. CFS do not use the CHI number for entitlement purposes, however, the CHI - can be used to positively identify a patient making a claim to be exempt from an NHS Charge. Patients will not be denied access to care as a result of a patient exemption NHS charge enquiry.

Sending out alerts regarding ‘suspicious’ use of services by individuals.
CFS deal with cases involving patients who potentially abuse the health service by making multiple and unnecessary visits to primary care contractors. It has been agreed with Board Caldicott Guardians that in cases of this nature the action shown below will be taken:-

- CFS will send an intelligence alert to Fraud Liaison Officers about an individual, copying it to the Board’s Caldicott Guardian.
- It will be the Caldicott Guardians’ responsibility to check that these are appropriate.
- The Caldicott Guardian of the host Board should also consider whether the advice of the child or adult protection lead should be sought as vulnerable individuals are at risk of exploitation.

Counter Fraud Services

18th December 2018