

FAO Laura Bradford, Assistant Coroner for East Sussex

[REDACTED]
**Coroner's Office (East Sussex),
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[REDACTED]
16th May 2024

Ref: Regulation 28 Report

Dear Ms Bradford,

We write in response to the Regulation 28 report, dated 22/03/2024 (the “**Report**”).

We were saddened to read of the death of Mr Finlayson and would like to take this opportunity to express our sincere condolences to his family.

We have undertaken an internal review of EMIS Web, focussing on the issues raised as areas of concern in the Report in relation to EMIS Web, namely a potential lack of interaction between clinical systems in prisons (predominantly SystemOne) and other clinical systems in community GP surgeries, and the evidence you heard that notes have to be printed and scanned on to SystemOne, with key information inputted manually, if an individual's GP practice uses a clinical system other than SystemOne.

This review was undertaken by our internal team, including a Product Manager, Clinical Safety Officer, and Clinical Director.

Transfer of Medical Records

In 2019, processes for transferring medical records from community GP practices to the relevant healthcare teams within prisons were aligned with [the NHS England specification for Primary Care Service – Medical and nursing for prisons](#) (latest PDF copy attached).

At this time, we understand that GP2GP (an interoperability function that enables electronic transfer of medical records between clinical systems, introduced by NHS Digital (now NHS England) in 2007) was not integrated into the prisons' clinical record systems, which meant that EMIS was unable to utilise GP2GP for medical record transfers. Therefore, EMIS advised sending printed medical records



via courier, in line with the process adopted by Primary Care Support England, who were responsible for moving medical records around the NHS.

With the implementation of GP2GP in prisons' clinical record systems in 2021, medical records could then be transferred electronically from the relevant community GP practice, utilising any system provider, to prisons via GP2GP. Prisons require a GP Organisation (ODS) code to use the GP2GP service, as the ODS code determines where the request is sent and where the medical record is received. Once a patient has registered to a prison's healthcare system, a 'GP2GP EHR Extract Request' is sent from the prison's clinical system to the patient's Community GP. The patient's community GP can use EMIS Web to prepare the record and send it as a 'GP2GP EHR Extract' message. Once the prison receives and reviews the medical record, it is marked as 'filed' and the record should be integrated into the prison's clinical system. The complete GP2GP process can be found in the GP registration digital guide here: www.digital.nhs.uk/services/guides/gp-registration.

EMIS are fully compliant, and have processes in place to remain compliant, with the latest versions of the NHS England GP2GP specification. Therefore, EMIS practices can receive medical record requests from prisons and return the requested information via the GP2GP process. EMIS practices also have the option to send printed medical records via courier when medical requests are not received from prisons via GP2GP (at the prison's discretion). In either scenario, EMIS would not have any control over whether the prison requests the medical records via the GP2GP process, or via a manual process.

Conclusion

We understand that the prisons and the clinical system providers involved have implemented the GP2GP process into prison systems since 2021, and as such, should a prison request medical records from a community GP practice utilising EMIS Web, there should be no reason why a transfer of medical records wouldn't complete in an appropriate and timely manner (if the correct process for utilising GP2GP is followed).

As detailed above, EMIS is compliant with NHS England GP2GP specifications, and we will continue to review our solutions to determine whether any performance improvements can be made. However, based on the information provided in the Report, and our subsequent review, we do not believe in this instance there are any software developments, beyond the existing functionality in the System, that are required to mitigate the specific risks raised in the Report.



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When needed, EMIS Web users have access to learning / training materials, including those materials regarding GP2GP, should they need to revisit how to prepare and send medical records to other healthcare facilities. Users are also able to contact EMIS support for any further guidance.

Thank you for bringing this to our attention, and we trust that the details outlined above assist. [REDACTED]

Kind regards,

[REDACTED]

[REDACTED]

Chief Medical Officer

