

## Corporate Administration

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**Date** 6 September 2021  
**Your Ref**  
**Our Ref** FOI 17180  
**Direct Line** Working remotely  
**Email** foi@ggc.scot.nhs.uk  
**Contact**

Dear Mr

**REQUEST FOR INFORMATION  
FREEDOM OF INFORMATION (SCOTLAND) ACT 2002  
ENVIRONMENTAL INFORMATION (SCOTLAND) REGULATIONS 2004**

Thank you for your request received on 9 August 2021 for the provision of information in relation to deaths from Covid-19.

We are treating your request under our procedures for responding to requests for information under the Freedom of Information (Scotland) Act 2002. The information that we are able to provide in response to your request is given below, underneath each of your questions.

**1. Please provide the total number of deaths that occurred within NHS Greater Glasgow & Clyde Health Board facilities, where COVID-19 (SARS-COV2 Coronavirus) was listed as a cause of death or recorded on the deceased's death certificate.**

**Can you please provide this information by date (including a total for 2020 and 2021) from February 2020 to today's date (7/8/2021) or the latest information available at the time of the response.**

**Can you also please provide this information in 5 year age group bands**

The information that we are able to provide in response to your request is provided in the attached spreadsheet called "17180 NHSGGC Covid deaths".

We would ask you to note the following important points regarding the information:

1. The information has been extracted from data provided by the National Records of Scotland (NRS). NHSGGC is not responsible for collation of information on the cause of death. All deaths within Scotland, regardless of where they occur, must have a medical certificate of cause of death completed by a registered medical practitioner, and a death must be registered within 8 days of the death occurring. Registration records are maintained by the National Records of Scotland (NRS) and it is therefore NRS which holds data on all deaths within Scotland, including details of the cause of death as specified on the medical certificate of cause of death.
2. NHSGGC does not allocate cause of death codes – this is undertaken by NRS. Cause of death codes are taken from the International Statistical Classification of Diseases and Related Health Problems (Tenth Revision) (ICD-10), and the codes are allocated by NRS computer software. The software produces the codes by analysing the textual information entered on the medical

certificate of the cause of death by the certifying doctor. This information is not generated by NHSGGC.

3. TrakCare is the patient management system which records admissions to NHSGGC facilities. This covers inpatient and day case admissions and data is collected within the SMR01 (Scottish Morbidity Record) dataset. All episodes of care, including where a death has occurred, are given a diagnostic code. However there is no recording of the cause of death on the SMR01 record. The Information Services Division (ISD) Data Dictionary states that:

***For patients who have died, the main condition is not necessarily the same as the condition recorded as the cause of death.***

It is therefore not possible to confirm that an ICD diagnosis code for an episode of care will correlate directly to the cause of a patient's death. NHSGGC therefore cannot provide an analysis of cause of death from SMR01 data held within NHSGGC systems.

4. There are serious concerns in relation to publishing differently derived or incomplete data, especially when NHSGGC is not the original source of the data being used to derive NHSGGC-only figures. Both the ONS and NRS have indicated there is an application of statistical skill and judgement to produce the high quality, assured data needed to inform decision-making. If this balance is incorrectly applied, then there is a risk of decisions being based on inaccurate data which is arguably not in the public interest. This will have an impact on public trust in official statistics in a time when accuracy of official statistics is more important to the public than ever before. NHSGGC is therefore unable to provide any guarantee that the information provided in this response will be consistent with outputs from other organisations, specifically National Records for Scotland who should be considered the primary source for analysis of deaths data.

Please note where there are small numbers these are presented as <5 to protect patient identification. This is due to the possibility that disclosure of actual figures would pose a risk that an individual or individuals could be identified from that information. DPA does not cover deceased individuals but does by extension cover their relatives, who might also be identified. To provide the small numbers would be contrary to, and would put NHSGGC in breach of, Data Protection principles. In assessing this, we have followed guidelines issued by NHS NSS Information Services Division. A key principle of the guidelines discourages presenting numbers which are less than 5.

We therefore decline to provide the actual figures on the basis that this is personal information. Section 38 of FOISA provides that information is exempt information if it constitutes personal information and that to disclose this information would contravene one or more of the data protection principles. The exemptions within FOISA that we have relied upon to withhold this information are section 38(1)(b) read in conjunction with section 38(2)(a)(i) of FOISA. This is an absolute exemption which means that if information is withheld under this exemption, we are not required to consider whether it is in the public interest to withhold it.

***2. Please provide the total number of deaths that occurred within NHS Greater Glasgow & Clyde Health Board facilities, where COVID-19 (SARS-COV2 Coronavirus) was listed as the sole cause of death by your hospitals or recorded on the deceased's death certificate.***

***Can you please provide this information by date (including a total for 2020 and 2021) from February 2020 to today's date (7/8/2021) or the latest information available at the time of the response.***

***Can you also please provide this information in 5 year age group bands***

***Please note this information has previously been provided by the other 13 NHS boards in Scotland and as such a precedent has already been set for it to be provided as a matter of public record.***

We are providing this information also in the attached spreadsheet. Again we refer you to the explanations provided in our response to your Question 1.

***3. Please provide the total number of deaths that occurred within NHS Greater Glasgow & Clyde Health Board facilities, where COVID-19 (SARS-COV2 Coronavirus) was listed as the cause of death and where the patient had a 'Do Not Resuscitate (DNR)' order placed on their file ahead of their death.***

***Can you please provide this information by date (including a total for 2020 and 2021) from February 2020 to today's date (7/8/2021) or the latest information available at the time of the response.***

There is no central database recording whether a DNR/DNAR CPR has been signed for a patient and these are recorded only in individual patients' case notes.

In order to provide this information it would require a review of individual patient histories. We estimate that the cost of providing this information would exceed the cost threshold set out in Fees Regulations (currently £600). Section 12 of FOISA provides that a public authority is not obliged to comply with a request where it calculates that the cost of complying would exceed this limit. On this occasion we are therefore unable to provide the information for this part of your request.

However it may be that a narrower or more defined request would allow us to provide some information within the cost limits, and I would therefore suggest that you make further contact in this respect, so that we can provide appropriate advice and assistance to identify what may be feasible.

For your information, we can tell you that DNR/DNAR CPR orders are signed by senior medical staff as the outcome of continuous dialogue and communication with patients, wherever possible, and family/carers, being involved in the decision making process as part of the person-centred conversations that we have, care and compassion being one of the key values of NHS GGC. This is in accordance with the Scottish Government policy to which we are providing a link:

<https://www.gov.scot/publications/decisions-cardiopulmonary-resuscitation-integrated-adult-policy/>

***4. Please provide the total number of deaths that occurred within NHS Greater Glasgow & Clyde Health Board facilities, where COVID-19 (SARS-COV2 Coronavirus) was listed as the cause of death and where the patient was already receiving End of Life Care within the hospital facilities, before they were tested positive for COVID-19***

***Can you please provide this information by date (including a total for 2020 and 2021) from February 2020 to today's date (7/8/2021) or the latest information available at the time of the response.***

Again, to identify this information would require a review of individual patient histories and we consider that the cost of providing this information would exempt it under Section 12 of FOISA as explained in our response to your Question 1.

***5. Please provide the total number of deaths that occurred within NHS Greater Glasgow & Clyde Health Board facilities, where COVID-19 (SARS-COV2 Coronavirus) was listed as a cause of death or recorded on the deceased's death certificate, where the patient caught COVID-19 whilst they were attending hospital or other GGC NHS facilities?***

***Can you please provide this information by date (including a total for 2020 and 2021) from February 2020 to today's date (7/8/2021) or the latest information available at the time of the response.***

***Can you also please provide this information in 5 year age group bands***

Once again, in order to identify this information would require a review of individual patient histories and we consider that the cost of providing this information would exempt it under Section 12 of FOISA as explained in our response to your Question 3.

For your information we are providing a link to the Public Health Scotland website which has information about hospital onset Covid-19 cases in Scotland:

<https://publichealthscotland.scot/publications/show-all-releases?id=20584>

This includes a further link to the report, "Hospital onset COVID-19 cases in Scotland Week ending 1 March 2020 to week ending 8 August 2021 (published 1 September 2021):

<https://publichealthscotland.scot/media/8914/2021-09-01-covid19-hospitalonset-week-31-2021-report-v01.pdf>

I hope that this is helpful. If you are not satisfied with our response to your request, you have a right to request a review of this decision within 40 working days of receiving this response. The attached note describes our review procedure. Your request for review must be in permanent form and should state:

- That you are asking for a review of this decision and
- Why you are unhappy with the response you have received.

If you wish us to carry out a review, please complete the form enclosed and return it to the Head of Corporate Governance and Administration, NHS Greater Glasgow & Clyde, Corporate HQ, JB Russell House, Gartnavel Royal Hospital, 1055 Great Western Road, Glasgow G12 0XH or by email to [foi@ggc.scot.nhs.uk](mailto:foi@ggc.scot.nhs.uk)

If following a review you remain dissatisfied with the outcome, you have the right to ask for advice, assistance or to make a formal appeal in writing to the Scottish Information Commissioner within six months of receiving the outcome of a review. The Commissioner can be contacted at: Kinburn Castle, Doubledykes Road, St Andrews, Fife, KY16 9DS or at [www.itspublicknowledge.info/Appeal](http://www.itspublicknowledge.info/Appeal)

If following appeal to the Scottish Information Commissioner you still remain dissatisfied with the outcome, you have a right of appeal to the Court of Session on a point of law against the decision of the Scottish Information Commissioner.

Should you require any clarification about this letter or the right to request a review please contact me at the details at the top of the first page of this letter.

Standard Enclosures:

FOI Requirement for Review document

Request for Review form