

Response ID ANON-TJ58-QRMG-2

Submitted to **Improving patient safety by bringing private healthcare and NHS information together into NHS systems**
Submitted on **2020-03-27 10:28:52**

About you

1. In what capacity are you responding to this consultation?

On behalf of an organisation

Other::

2. If applicable, please provide the name of your organisation:

Organisation:

The Royal College of Nursing

3. If applicable, please tell us what type of organisation you work for - please tick all that apply:

Professional body representing clinicians, Other – please specify below

Other::

Professional body and Trade Union

4. If your views are representing a group, please tell us which role types were consulted with prior to providing the response for this consultation - please tick all that apply:

Other – please specify below

Other::

Research and Evidence team

Private Healthcare Information Reporting Change Proposal

About the ADAPt Programme

5. Please provide any comments on the vision, aims and expected outcomes of the ADAPt Programme (Section 3):

The RCN supports the vision and aims for this programme. Bringing together private healthcare provider data and NHS patient data is essential for transparency and scrutiny. Ultimately this would allow for patient outcomes/safety and service quality to be assessed across settings. Further, health records/medical history should be completed for all patients irrespective of where they are accessing treatment. Professionals and patients would then be better equipped to make informed choices and decisions around care.

A single repository would also allow for whole population analysis, generating better insight into population usage of health services and health outcomes. Important to enable differentiation between services/sectors/settings to create a more developed picture.

Workforce data reporting should be included in the vision/aims of this programme to allow comprehensive assessment of staffing across NHS and non-NHS settings.

6. Please provide any comments on the guiding principles of the ADAPt Programme (Section 3):

The guiding principles are comprehensive and should provide reassurance to organisations that measures will be in place to minimise burden or impact on core business functions.

About this change proposal

7. Please provide any comments on implications or concerns relating to the organisational aspects of this change proposal, such as policy or business processes (Section 5):

This is outside of our scope of work, no comment to make.

8. Please provide any comments on implications or concerns relating to the technical aspects of this change proposal, such as changes to systems, data flows or standards (Section 5):

The RCN would encourage consistency in reporting systems between NHS and non-NHS providers which has been considered in the proposal.

The proposed data flows and standards would mitigate risk/identified issues.

9. Please provide any comments on implications or concerns relating to the financial costs or other burden aspects of this change proposal, such as costs for changes to systems or potential increase or reduction in burden (Section 5):

We welcome the reduced time and cost burden outlined in the proposal. Though given the current climate we would encourage an adaptation period as well as training opportunities, especially as many departments will have limited capacity.

10. Please provide any comments on implications or concerns relating to the data protection, privacy and confidentiality aspects of this change proposal, such as concerns over potential for unclear collection, processing or data sharing by NHS Digital (Section 5):

In the new single data source, differentiation between NHS and non-NHS providers data must be possible to allow for better quality analysis.

Issues relating to data protection, privacy and confidentiality are adequately addressed in the proposal.

About the future closer alignment of private healthcare and NHS funded data

11. Please provide any comments on the potential implications or barriers to future closer alignment of private healthcare data with systems and processes for NHS funded care (Section 6):

If ADAPt is successful, assuming minimal impact to organisations and staff, this opens possibilities for broader alignment of other data types across NHS and non-NHS provision such as workforce and vacancy data.

12. Do you have any further comments?:

Would need to encourage a range of providers to participate in the pilot phase to generate robust feedback across various settings.

We will treat all responses in the strictest confidence.

If you are happy for us to contact you to clarify your comments, please tick here and provide your email address below. :

Yes

Email:

Emily.Maynard@rcn.org.uk