NHS Digital 1 Trevelyan Square Boar Lane Leeds LS1 6AE



By email only: enquiries@nhsdigital.nhs.uk

25 March 2020

Dear Sirs

Acute Data Alignment Programme (ADAPt) - Private healthcare data reporting change

APIL welcomes the proposal that information about all private healthcare patient activity is reported to NHS Digital, alongside information about NHS funded patients, using "common data standards". We agree with NHS Digital that having a single repository of comparable information about NHS funded and private patients would make it easier to identify patient safety concerns, measure patient outcomes, and share information with a wider range of stakeholders involved in ensuring good quality and safe patient care.

The Paterson case highlighted how failing to share information between the NHS and the independent sector can put patients at the risk of harm where that consultant does not document or share accurate information in an appropriate way. From the independent inquiry into the issues raised by Paterson, it is clear that if there had been more sharing of data between healthcare providers, and generally more accessible data about consultants and their entire practice, the damage caused by Paterson could have been brought to an end sooner. Steps must be taken to avoid similar incidents in the future.

While we welcome the steps that NHS Digital is taking, we agree with the independent inquiry that it is not sufficient to simply collect and hold data from all sources. The data collected must be properly scrutinised and analysed if patterns are to be detected, and it is important that data is made accessible and displayed in an easily understandable format for the public. As the inquiry points out on numerous occasions throughout their report, there is a culture in the private healthcare system to avoid evidence that problems are systemic, and instead treating each issue/patient complaint in isolation. The data gathered from both the public and private sphere must be analysed properly, so that patterns of poor behaviour can be identified and acted on as soon as possible. There must also be transparency through the provision of information to the public.

We hope that our comments prove useful to you.

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Yours faithfully

Alice Taylor

Legal Policy Officer