



To All SBNS Members

9th July 2019

Dear Colleagues,

Re: Neurosurgical National Audit Programme – Update

In 2018 it became essential to migrate the Neurosurgical National Audit Programme to a more robust provider and this required us to reapply for access to patient data to NHS Digital through its digital access request service (DARS).

2018 was also the year in which the General Data Protection Regulations came into force in the UK with a considerable tightening up of data security for Data Controllers (the SBNS) and Data Processors (our new audit platform provider).

I am sure you will have heard of the very significant fines imposed recently for lapses in data security. These are imposed by the Information Commissioner's office and our work will be subject to the same laws as were imposed on Facebook and British Airways.

GDPR relates to personal data and healthcare data is one of the most sensitive categories of personal data.

The ICO expects state of the art cybersecurity and this has influenced our choice of provider.

Our application to DARS has been necessarily complex, involved and lengthy as access to data must satisfy the principles of the GDPR and those of data security outlined on the ICO website.

During our application there have been changes to the sensitivity of various data fields - in particular patient identifiable data. In the first instance we hope to have access to pseudonymised data which will allow our website to reopen.

NNAP is based on HES data from all trusts and surgeons. This data is has not been consented by individual patients. Accessing patient level data requires us to demonstrate a legal basis for owning non-consented patient data.

Demonstration of this legal basis requires application to the Confidentiality Advisory Group of the NHS Health Research Authority. This is part of a parallel application which hopefully will allow us to have patient identifiable data for the purposes of our outlier programme. When we get patient level data we will run the outlier program for 2018 for all trusts and surgeons. We have been preparing the website framework for this with our provider.

I am sure we will succeed in the end and would like to thank everyone for their patience regarding the absence of the website during this period. It is heartening to realise it has been of use.

Nick Phillips
Chairman of National Neurosurgical Audit Programme