Information standards for health and adult social care in England
BCS response

About this document:

The BCS Health and Care Executive is a committee of BCS members that covers all aspects of digital health and informatics. This committee has compiled the following response to a series of questions posed by the Department of Health and Social Care Consultation looking at Information Standards for health and social care in April 2024.

Preparing and publishing mandatory information standards:
Question 1

Do you think that, before preparing an information standard, the Secretary of State or NHS England should be required to obtain advice? (For example, from an advisory board or other persons)

- Yes
- No
- Don't know

Response:

- Yes

Question 2

Which of the following areas should be represented on such a board or included as other persons from whom advice is sought? (Select all that apply)

- Privately funded health and care providers
- Health and care providers that are funded in part publicly and in part privately
- IT suppliers
- Patient and public representatives
- Representatives of NHS England

- Other (please specify)

Response:

All those listed should be included and the following:

- Professional bodies: BCS, AphA, FEDIP
- Health Informatics Standards organisations: HL7 UK, INTEROPen, PRSB, BSI IST/35, IHE UK
- Research bodies: HDR UK, NIHR
- Medical devices community (suppliers, NHS organizations, professional engineering bodies such as IPEM and IET, MHRA) as medical devices need to exchange information and interoperate with health and care IT systems.
- Universities with health informatics departments
- Regulatory: NICE, CQC
- Royal Medical Colleges and other professional bodies for clinicians with IT committees
- CCIO Network, CIO Network, CNIO Network
- Health think tanks: King's Fund, Nuffield Trust, Health Foundation
- Social care/Local government: Socitm (Society of Information Technology Management), ADASS (Association of Directors of Adult Social Services), LGA (Local Government Association)
- Defence Medical Services
- Other UK nations

Question 3

In addition to seeking advice, which of the following do you think the Secretary of State or NHS England should consider before preparing an information standard? (Select all that apply)

- Capacity of the health or adult social care system to implement a new standard
- The need for alignment with open or international standards
- Impact on the provision of health or adult social care services
- Cost of implementation
- Impact on existing contracts
- Other (please specify)

Response:

All those listed should be included and the following:

- Patient safety
- Risks throughout the lifecycle of development, deployment, operation and deprecation
- Costs throughout the lifecycle for all stakeholders including health and care providers as well as central bodies
- Capacity of suppliers and relevant central bodies
- In addition to existence of open and international standards, their adoption or otherwise in the global market place
- Data quality and management
- Business cases
- Benefits of implementation

Question 4

In your opinion, which of the following should be included in an information standard when published? (Select all that apply)

- Name of the information standard
- Date on which it was published
- The fact that it must be complied with
- The consequences of failure to comply
- The fact that the Secretary of State may require a person to provide the Secretary of State with documents, records or other information for the purposes of monitoring the person's compliance with information standards
- Information on any guidance about implementation of the standard
- A list of changes to the information standard - for example, revisions over time
- The person who prepared the information standard and their contact details
- Any related information standards
- Information on the interval at which the information standard is to be reviewed
- Such other information as the decision maker considers appropriate
- Other (please specify)

Response:

All items listed should be included and the following:

- Scope of information standard clearly defined
- Plain English definition of the standard and its purpose
- Owner of the standard – responsible for development, implementation, maintenance, etc.
- Organisation which developed the standard and those organisations endorsing the standard
- Versioning and change control
- The technical specification
- Conformance criteria for all stakeholders including suppliers, care providers and, importantly, central bodies.
- Implementation guidance should be mandatory and in accordance with defined rules and regulations (see response to question 7).
- In addition all comments and feedback provided by stakeholders at each stage should be made publicly available together with issues and decisions made in response.

Question 5

What do you think would be an appropriate minimum interval for reviewing an information standard?

- No fixed interval - case by case decision
- Reviewed every 18 months
- Reviewed every 3 years
- Reviewed every 5 years
- Other (please specify)

Response:

No fixed interval - case by case decision

Question 6

Should the regulations specify that minimum interval?

- Yes
- No
- Don't know

Response:

Yes (the regulations should state that each standard must include a minimum interval for review).

Question 7

If you think that any other procedures should be followed in connection with the preparation and publication of information standards, please list them.

Response:

- Established standards development organizations (SDOs) all have rules and regulations (that are transparent and in the public domain) for
- the process of developing standards
- independently commenting on and assuring standards
- drafting and publishing standards
- In order to ensure consistency, acceptable quality and reduced costs, the same things are also needed for Information standards for health and adult social care.
- These are called Rules and regulations for information standards for health and adult social care in the responses to the questions that follow this one.

Revising information standards:
Question 8

In your opinion, which procedure should revisions to an information standard follow?

- Revisions should go through the full procedure
- Revisions should go through a 'light touch' procedure
- Only some revisions should go through the full procedure - for example, those that the decision maker considers significant and that are not made in discharge of a legal obligation
- Only some revisions should go through a 'light touch' procedure - for example, those that the decision maker considers significant and that are not made in discharge of a legal obligation
- Revisions should not go through any procedure
- Revisions should go through other procedures (please specify)

Response:

Revisions should go through other procedures.

Revisions to standards can range from small updates and corrections to major new releases so a proportionate approach is needed. The procedure for each revision should be determined on a case-by-case (and audited) basis using a process set out in the suggested Rules and regulations for information standards for health and adult social care (see response to previous question – number 7).

Clear change control and versioning is vital for all revisions, including communication of revisions.

Question 9

In your opinion, which steps should a 'light touch' procedure for revisions to an information standard include? (Select all that apply)

- Obtain advice, such as from an advisory board or other persons
- Consider capacity of the health or adult social care system to implement changes
- Consider alignment with open or international standards
- Consider impact on the provision of health or adult social care services
- Consider cost of implementation
- Consider impact on existing contracts
- Don't know
- Other (please specify)

Response:

Other:

All the items listed for this question and in response to question 3 should be considered. The procedure should be as stated in response to the previous question (question 8) using the suggested rules and regulations for information standards for health and adult social care.

Revoking information standards:
Question 10

In your opinion, which procedure should revoking (withdrawing) an information standard follow?

- Revocations should go through the full procedure, except those made in discharge of a legal obligation
- Revocations should go through a 'light touch' procedure, except those made in discharge of a legal obligation
- There is no need for revocations of information standards to go through any procedure
- Revocations, except those made in discharge of a legal obligation, should go through other procedures (please specify)

Response:

Revocations should go through other procedures:

The procedure for each revocation should be determined on a case-by-case (and audited) basis using a process set out in the suggested Rules and regulations for information standards for

health and adult social care (see response to question number 7).

Question 11

In your opinion, which steps should a 'light touch' procedure for revocations of an information standard include? (Select all that apply)

- Obtain advice, from an advisory board or other persons
- Consider capacity of the health or adult social care system to implement changes
- Consider alignment with open or international standards
- Consider impact on the provision of health or adult social care services
- Consider cost of implementation
- Consider impact on existing contracts
- Don't know
- Other (please specify)

Response:

Other:

All the items listed for this question and in response to question 3 should be considered as required by the process. The procedure for each revision should be determined on a case-by-case (and audited) basis using a process set out in the suggested Rules and regulations for information standards for health and adult social care (see response to question number 7)

Adopting information standards:
Question 12

In your opinion, what procedure should adopting information standards follow?

- Adopted information standards should go through the full procedure
- Adopted information standards should go through a 'light touch' procedure
- There is no need for adopted information standards to go through any procedure
- Adopted information standards should go through other procedures (please specify)

Response:

Adopted information standards should go through other procedures:

The procedure for each adopted information standard should be determined on a case-by-case (and audited) basis using a process set out in the suggested Rules and regulations for information standards for health and adult social care (see response to question number 7).

Question 13

In your opinion, which steps should a 'light touch' procedure for adopted

information standards include? (Select all that apply)

- Obtain advice from an advisory board or other persons
- Consider capacity of the health or adult social care system to implement changes
- Consider alignment with open or international standards
- Consider impact on the provision of health or adult social care services
- Consider cost of implementation
- Consider impact on existing contracts
- Don't know
- Other (please specify)

Response:

All the items listed for this question and in response to question 3 should be considered as required by the process. The procedure for each revision should be determined on a case-by-case (and audited) basis using a process set out in the suggested Rules and regulations for information standards for health and adult social care (see response to question number 7).

Question 14: Do you have any other feedback you'd like to share?

It is vital that all information standards documentation is easy to find and navigate. We endorse the approach taken for the NHS England standards directory.