

## **National Bowel Cancer Audit (NBOCA) Outlier Policy – Updated December 2024**

### **1. Introduction**

The policy sets out the actions that the National Bowel Cancer Audit (NBOCA) will take when data indicate that results for a NHS trust in England or a MDT in Wales deviate significantly from the expected value for outcomes published as part of the annual NBOCA State of the Nation Report. This is to support quality assurance and quality improvement.

A potential outlier is a result that is further from the national average (mean) than would usually occur by chance alone.

This policy applies to the National Bowel Cancer Audit (NBOCA) State of the Nation report, publication January 2025.

#### ***Updates to the outlier policy***

The NBOCA Outlier Policy is reviewed on an annual basis, aligned to [HQIP Outlier Guidance](#).

The NBOCA Outlier Policy was last updated December 2024.

Please direct any feedback or questions about this policy to [NBOCA@rcseng.ac.uk](mailto:NBOCA@rcseng.ac.uk)

### **2. Outlier Identification**

The [NBOCA Quality Improvement Plan](#) sets out ten performance indicators with local targets for NHS trusts in England and MDTs in Wales. The indicators aim to better understand the determinants of variation in the treatment of people with bowel cancer and the outcomes they experience.

The responses of confirmed outliers are published online at [NBOCA.org.uk](http://NBOCA.org.uk) at the same time as the publication of the annual State of the Nation report.

#### **2.1 Potential outliers at Trust/MDT level will be assessed on the following performance indicators:**

- a. 90-day mortality after major resection
- b. 30-day unplanned return to theatre after bowel cancer resection
- c. 30-day unplanned readmission after bowel cancer resection
- d. Severe acute toxicity during/after adjuvant chemotherapy for stage 3 colon cancer
- e. 18-month diverting unclosed ileostomy after anterior resection
- f. Two-year survival rate after bowel cancer resection

In order to make fair comparisons across trusts and MDTs, all performance indicators are risk-adjusted for age, sex, performance status, TNM stage (tumour, node, metastasis staging) and site of cancer.

Information on the rationale, calculation and interpretation of each performance indicator is available [here](#).

## 2.2 Data Quality Review Process

NBOCA produces quarterly reports, published at [NBOCA.org.uk](https://www.nboqa.org.uk). This is to support trusts and MDTs to review their data quality for each of the data items used for risk-adjustment (see 2.1).

## 2.3 Definitions

The term “Alarm” will be adopted.

### ***Definition of an Alarm:***

Greater than three standard deviations from the national average (mean).

### ***Definition of a potential outlier:***

- (i) Trusts/MDTs identified as an Alarm.
- (ii) Trusts/MDTs identified as greater than two standard deviations twice in three consecutive years for outcomes with a one-year reporting period i.e.:
  - 90-day mortality after major resection
  - 30-day unplanned return to theatre after bowel cancer resection
  - 30-day unplanned readmission after bowel cancer resection
  - Two-year survival rate after bowel cancer resection

For the period this policy relates to (people diagnosed between 1 April 2022 to 31 March 2023) **trusts/MDTs will be notified but will not be considered as potential outliers** in cases where data quality or data completeness prevents a conclusion being drawn about its outlier status. This is because NBOCA is using new sources of data for this reporting period.

### 3. Outlier Reporting Process and Timeframes

The following actions and timeframes will be implemented by NBOCA for trusts and MDTs identified as potential outliers (see Section 2).

Step	Action	Owner	Within working days
1	NBOCA Project Team to scrutinise data handling and analyses of Trusts/MDTs with potential outlier status: (a) Outlier status not confirmed - <i>document and close</i> (b) Potential outlier status confirmed - <i>go to step 2</i>	NBOCA Project Team	10
2	Trust/MDT Lead Clinician informed about potential outlier status and asked to identify any data errors or justifiable explanation(s). All relevant data and analyses made available to Lead Clinician.	NBOCA Project Team	5
3	Trust/MDT Lead Clinician to provide written response to NBOCA Project Team.	Trust/MDT Lead Clinician	25
4	NBOCA Project Team to review written response to determine whether: (a) Outlier status not confirmed - <i>document and close</i> (b) Outlier status confirmed - <i>go to step 5</i>	NBOCA Project Team	20
5	NBOCA Project Team send email to offer to discuss confirmed outlier status with Trust/MDT Lead Clinician by telephone, prior to sending written notification of confirmed outlier status to Trust/MDT CEO and copied to Trust/MDT Lead Clinician and Medical Director. All relevant data, statistical analyses and earlier response from Trust/MDT Lead Clinician made available to Trust/MDT Medical Director and CEO.	NBOCA Project Team	5
	<p><b>England</b> Outlier confirmation letter to also include details in step 7 below, and request that the Trust engage with their CQC local team. Provide NBOCA Outlier Policy to Trust. Notify the CQC, NHSE and HQIP, requesting confirmation of receipt. The CQC will provide NHSE with a quarterly report of all outliers notified to the CQC.</p> <p><b>Wales</b> Notify NHS Wales and HQIP to confirm MDT outlier status, requesting confirmation of receipt.</p>		

Step	Action		Owner	Within working days
6	<p><b>England</b></p> <p>Proceed to public disclosure of comparative information that identifies Trusts with outlier status.</p> <p>Trusts who have an outlier investigation, that they or others have performed, will be published as an addendum or footnote to the annual NBOCA State of the Nation Report. If no response received from the Trust, this will be documented on the applicable NBOCA webpage.</p>	<p><b>Wales</b></p> <p>Acknowledge receipt of the written notification confirming that a local investigation will be undertaken with independent assurance of the investigator's validity for outliers, copying in the Welsh Government.</p> <p>MDT CEO informed that the NBOCA will publish information of comparative performance which will identify Trusts/MDTs.</p>	<p><b>England:</b> NBOCA Project Team</p> <p><b>Wales:</b> MDT CEO</p>	<p><b>England:</b> NBOCA State of the Nation Report publication date: Jan 2025</p> <p><b>Wales:</b> 10</p>
7	<p><b>England</b></p> <p>The CQC advise that during their routine local engagement with Trusts, their inspectors will:</p> <ul style="list-style-type: none"> <li>- Encourage Trusts to identify any learning from their performance and provide the CQC with assurance that the Trust has used the learning to drive quality improvement</li> <li>- Ask the Trust how they are monitoring or plan to monitor their performance</li> <li>- Monitor progress against action plan if one is provided by the Trust.</li> </ul> <p>If an investigation has been conducted in the Trust into potential outlier status, it is required that the CQC and audit provider will be provided with the outcome and actions proposed.</p> <p>This would be published by the audit provider alongside the annual NBOCA State of the Nation report. If no response, NBOCA Project Team will publish this absence of response. The CQC are not prescriptive concerning any such investigation but there needs to be a degree of independence so that the validity of the findings is acceptable.</p>	<p><b>Wales</b></p> <p>The Welsh Government monitors the actions of organisations responding to outlier and takes further action as and when required. The Healthcare Inspectorate Wales (HIW) does not act as regulator and cannot take regulatory action in relation to NHS providers. However, HIW can request information on the action undertaken by organisations to ensure safe services are being delivered. The Welsh Government can share information with HIW where appropriate and advise on the robustness of plans in place to improve audit results and outcomes.</p> <p><b>Wales</b> N/A</p> <p><b>Wales</b> N/A</p>	<p><b>England:</b> CQC</p> <p><b>Wales:</b> Health Inspectorate Wales (HIW)</p> <p>Trust Medical Director</p> <p>NBOCA Project Team</p>	<p>Determined by CQC and HIW</p>
Step	Action		Owner	Within working days

8	<b>England</b> N/A	<b>Wales</b> If no acknowledgement received, NBOCA Project Team will send reminder letter to MDT CEO, copied to Welsh Government and HQIP. If not received within 15 working days, Welsh Government notified of non-compliance in consultation with HQIP.	NBOCA Project Team	<b>Wales: 15</b>
9	<b>England</b> N/A	<b>Wales</b> Public disclosure of comparative information that identifies MDT (e.g. alongside NBOCA State of the Nation Report in January 2025.	NBOCA Project Team	<b>Wales</b> NBOCA State of the Nation Report publication date: Jan 2025