

Digital Clinical Safety

Dr Becky Garrett
Clinical Safety Officer, Digital Governance Lead



What is Digital Clinical Safety?

'Digital clinical safety' refers to the avoidance of harm to patients and staff as a result of technologies manufactured, implemented and used in the health service. It is important across digital systems' lifecycles and is part of a culture of patient safety focused on learning from best practice and speaking up about emerging risks.



Improve the safety of Digital Technologies



Reduce Harm



Digital technologies to improve patient safety



Safety Standards



Information standards are the mechanism by which requirements are introduced that the NHS, it's commissioned services and IT system suppliers must conform.



DCB0129 and DCB0160 are Digital Clinical Safety Standards and compliance is mandated under the Health and Social Care Act 2012

DCB0129

Manufacturers of Health
IT Systems

Clinical Safety Officer

Understand processes

Undertake Risk Assessment

Complete Deliverables:
Clinical Risk Management Plan,
Hazard Log and Clinical Safety Case
Report

Post-deployment surveillance & ongoing review



DCB0160

Healthcare Organisation implementing Health IT Systems

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Deliverables

(Robust Body of Evidence)

Clinical Risk Management Plan	How are you going to compile your evidence?
Clinical Safety Case Report	What is your evidence?
Hazard Log (Hazard Workshop)	Hazards and mitigations



Digital Technology Assessment Criteria (DTAC)

Brings together legislation and best practice

Designed to be used by healthcare organisations to assess suppliers at the point of procurement

Sets out what is expected from suppliers to engage with the NHS and Social Care.



Table of contents

- A. Company information Non-assessed section
- B. Value proposition Non-assessed section
- C. Technical questions Assessed sections
 - C1 Clinical safety
 - C2 Data protection
 - C3 Technical security
 - C4 Interoperability criteria
- D. Key principles for success
 - D1 Usability and accessibility scored section

Supporting documentation



Table of contents

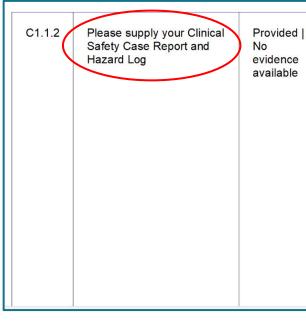
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Supporting documentation



Code	Question	Options	Supporting information	Scoring criteria
C1.1	Have you undertaken Clinical Risk Management activities for this product which comply with DCB0129?	Yes No	The DCB0129 standard applies to organisations that are responsible for the development and maintenance of health IT systems. A health IT system is defined as "product used to provide electronic information for health and social care purposes".	To pass, the developer is required to confirm that they have undertaken Clinical Risk Management activities in compliance with DCB0129.





Specifically, your DTAC submission should include:

- A summary of the product and its intended use
- A summary of clinical risk management activities
- A summary of hazards identified which you have been unable to mitigate to as low as it is reasonably practicable
- The clear identification of hazards which will require user or commissioner action to reach acceptable mitigation (for example, training and business process change)

It should not include the hazard log in the body of the document - this should be supplied separately. To pass, the developer is required to submit the Clinical Safety Case Report and Hazard Log that is compliant with the requirements set out in DCB0129. This should be commensurate with the scale and clinical functionality of the product and address the clinical risk management activities specified with the standard.

The Clinical Safety Case Report should present the arguments and supporting evidence that provides a compelling, comprehensible and valid case that a system is safe for a given application in a given environment at the defined point in the products lifecycle. It should provide the reader with a summary of all the relevant knowledge that has been acquired relating to the clinical risks associated with the product at that point in the life cycle:



Clinical Safety Process

System

People

Process



Clinical Safety Process

HAZARD VS RISK

A HAZARD is something that has the potential to harm you

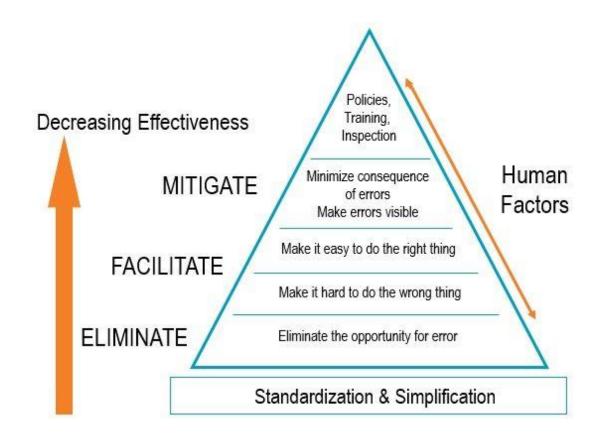


RISK is the likelihood of a hazard causing harm



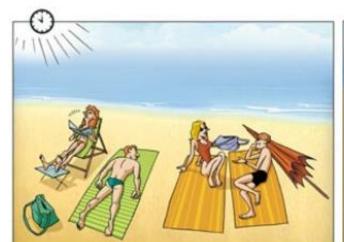


Clinical Safety Process





Mitigations





RISK = HAZARD x EXPOSURE

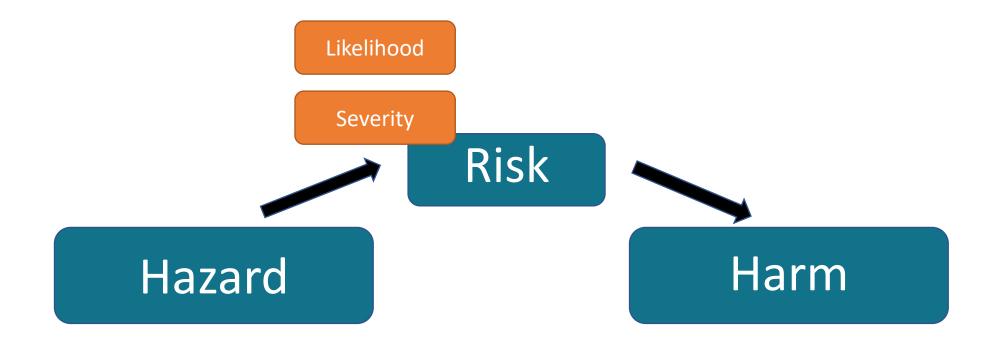


Hazard

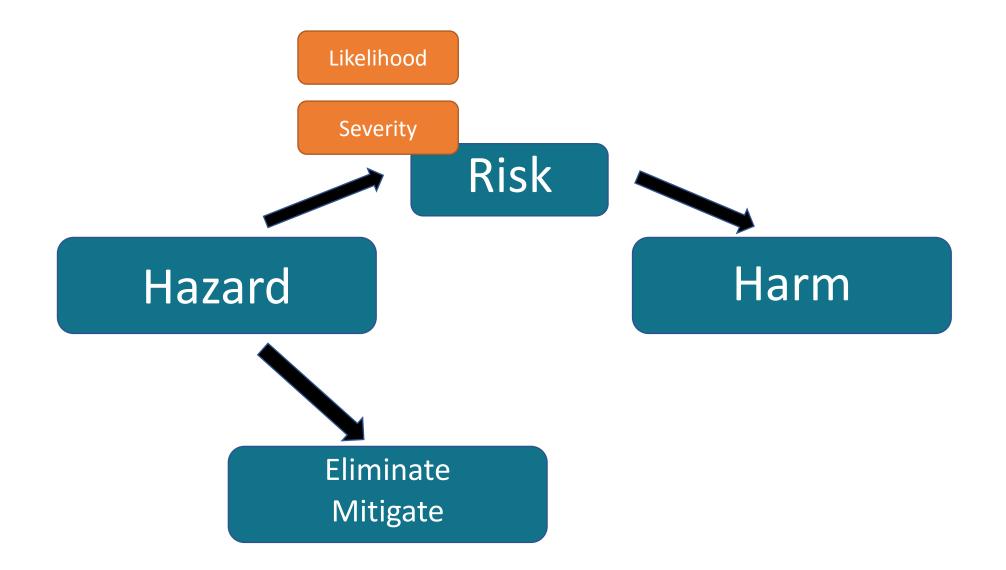




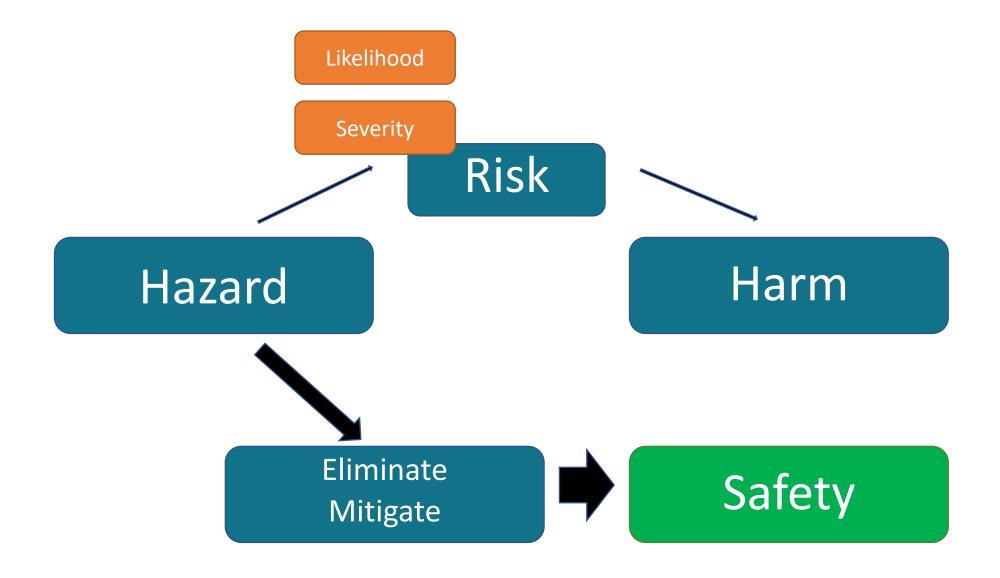




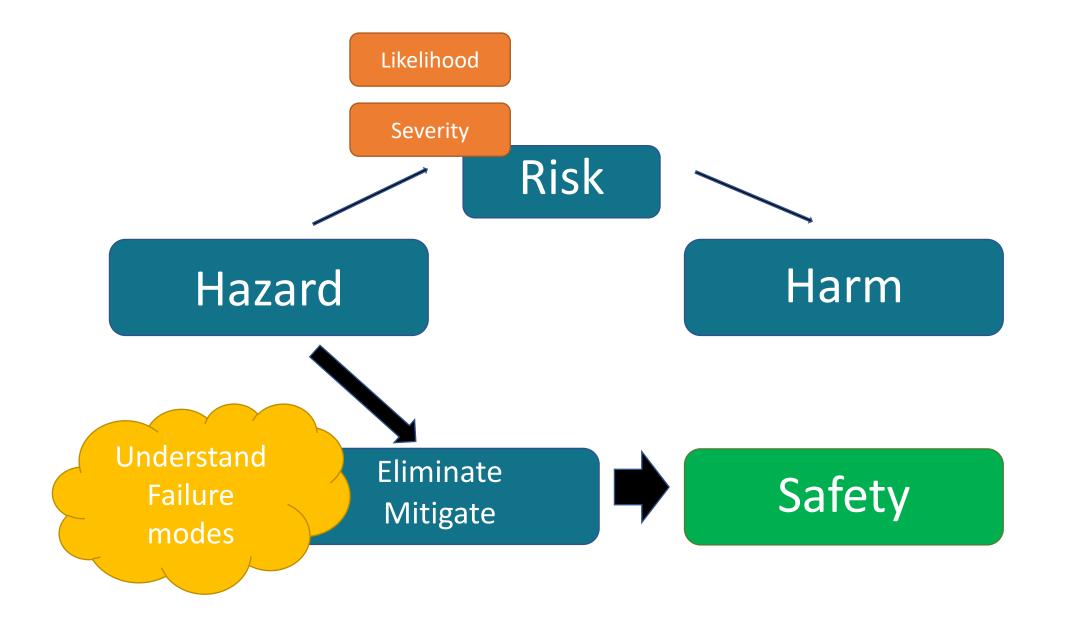












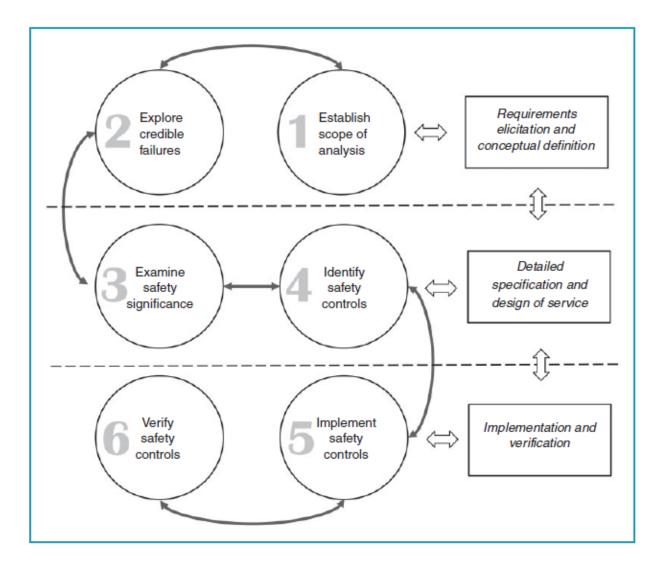
Failure Modes



Guideword	Interpretation	Guideword	Interpretation
Omission	Something missing when expected	Commission	Something present when not expected
Early	Something happening earlier than expected	Late	Something happening later than expected
Sequence	Something happening out of sequence (when it matters)	Value	Wrong value in a piece of information
Lapse	A person not doing something that they were sup- posed to	Slip	A person doing something wrong accidentally
Mistake	A person doing something wrong intentionally (unaware that it is wrong — i.e. not malicious)	Access	Someone or something have unintended access to resources or data
More	Unintended increment in the quantity of an attribute of a system element (N.B. needs description of the attribute and its scale)	Less	Unintended decrement in the quantity of an attribute of a system element (N.B. needs description of the attribute and its scale)
Overload	Overloading a system or person (can also be thought of as a specific case of 'more')	Other	Generic guideword to encourage free discussion about something going wrong but not covered by the suggested guidewords
Wrong	A generic guideword capturing something wrong happening in the system	Violation	



Overview





References

Slide 2, 3: https://transform.england.nhs.uk/key-tools-and-info/digital-clinical-safety-strategy/

Slide 4: Data Coordination Board (DCB) 0160: Clinical Risk Management: It's Application in the Deployment and Use of Health IT Systems [online] https://digital.nhs.uk/services/clinical-safety

Slide 4: Data Coordination Board (DCB) 0129: Clinical Risk Management: It's Application in the Manufacture of Health IT Systems [online]

https://digital.nhs.uk/services/clinical-safety

Slide 4:Health and Social Care Act 2012 – Section 250. [online]

https://www.legislation.gov.uk/ukpga/2012/7/section/250

Slide 7: https://digital.nhs.uk/services/clinical-safety

Slide 8-12: NHSx. Digital Technology Assessment Criteria for Health and Social Care (DTAC). 2021 [online] https://transform.england.nhs.uk/keytools-and-info/digital-technology-assessment-criteria-dtac/

Slide 15: Adapted Hierarchy of Controls

Slide 23, 24: Despotou G, Ryan M, Arvanitis TN, Rae AJ, White S, Kelly T, Jones RW. A framework for synthesis of safety justification for digitally enabled healthcare services. Digit Health. 2017 Apr

24;3:2055207617704271. doi: 10.1177/2055207617704271. PMID:

29942592; PMCID: PMC6001195.