



Burden Reduction Plan

Glossary of Terms

Term / Abbreviation	What it stands for
ALB	Arm's Length Body
DH	Department of Health
HSCIC	Health and Social Care Information Centre
MOU	Memorandum of Understanding
NHS	National Health Service

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1 Introduction

The primary purpose of the health and social care system is to improve outcomes for people who use its services. The new health and care system has been designed to give greater influence to citizens and service users.

Everyone involved in health, public health and social care needs access to accurate and timely information to carry out their duties. We also have a public duty to collaborate in the interests of good care and outcomes, and in the interests of efficiency and productivity. We must obtain that information efficiently, so that it is not at the expense of direct care to people who need the services. As far as possible, this will be done by ensuring the information is captured as part of the care-giving process, is recorded in standard ways, and is capable of being extracted automatically to remove the need for separate collection or reporting processes.

1.1 Purpose of the Burden Reduction Plan

Following the recommendations from the NHS Confederation in their report on reducing burdens in November 2013, a set of core principles (a concordat) governing the collection of data from NHS bodies, to secure a more collaborative and systematic approach to data collections across the health and social care system was put together and signed by DH and each ALB.

To further support and strengthen the BRP activity, George Freeman MP wrote to all ALB Chief Executive Officers requesting commitment to the development of a 2016/17 Burden Reduction Plan.

In summary the concordat for reducing burden asks DH and its ALBs to:

- collect data which is proportionate and with a clear business purpose
- not duplicate other data collections
- work through the HSCIC as the national base for all data
- review the need to collect the data regularly

This burden reduction plan has been put together to share wider the Human Tissue Authority's plans to minimise and reduce burden and to monitor successes.

1.2 About the Human Tissue Authority (HTA)

The HTA is a regulator set up in 2005 following events in the 1990s that revealed a culture in hospitals of removing and retaining human organs and tissue without consent. The legislation that established us not only addressed this issue but also updated and brought together other laws that relate to human tissue and organs.

We were created by Parliament as a non-departmental public body sponsored by the Department of Health, and are overseen by an Authority of lay and professional members.

We regulate organisations that remove, store and use human tissue and organs for research, medical treatment, post-mortem examination, education and training, and display in public. We also give approval for organ and bone marrow donations from living people.

1.3 Data Collections

The Human Tissue Authority's data collection information is available via the HSCIC's Central Register of Assessed Collections: [HTA Collections](#)

2 Minimising Burden

2.1 The Human Tissue Authority's burden reduction activities & plan

As an ALB, the Human Tissue Authority is committed to minimising burden and to the concordat recommendations which include:

Date	Concordat Requirement	Description of activity	Timescale/Progress
	<p>Only collect information from service providers where there is a clear business purpose which justifies the administrative burden required to provide the information</p>	<p>Of our nine existing data collections, three are a statutory requirement derived from EU legislation.</p> <p>We regulate across six diverse sectors, and the six additional collections are deemed to be the minimum necessary to give us sufficient information to ensure our regulation remains risk based, e.g. to provide information which helps determine the frequency and nature of inspections.</p> <p>Of these six, five are only collected every two years in order to keep burden to a minimum, and the other only requires information to be provided when an incident occurs.</p> <p>As such collections provide assurance without the need for a site visit; they are providing a reduction in the overall regulatory burden on establishments.</p>	<p>No new data collections planned for this business year.</p> <p>If there is any new data collection in future years, careful consideration will be given to justifying the administrative burden to provide the information. In doing so we will work closely with HSCIC/SCCI and their established processes.</p>

Date	Concordat Requirement	Description of activity	Timescale/Progress
	Work with the Health and Social Care Information Centre (HSCIC) as the national base for all information which is collected or extracted from local systems;	<p>The HTA has met with colleagues from HSCIC to develop the burden reduction plan, and attended burden reduction workshops.</p> <p>The HTA will work closely with HSCIC when designing new data collections to ensure that we are not duplicating any other existing data collections and that they are designed in a way to minimise burden on the service.</p>	
	Establish clear criteria which can be used to measure the administrative burden arising from each national request for information	<p>Burden will be estimated using the revised end to end burden methodology. This has been carried out for all existing collections.</p> <p>We will continue to work with HSCIC's BAAS to ensure revised burden estimate is updated on the BAAS Central Register of Collections.</p>	Update on burden estimates to be provided to HSCIC by 30 June 2016 for inclusion in the central register.
	Through the HSCIC, publish details of all the national collections and extractions, and the criteria that are used to justify each decision;	The HTA's data collection information is available via the HSCIC's Central Register of Assessed Collections.	Update on collections and justification to be provided to HSCIC by 30 June 2016 for inclusion in the central register.

Date	Concordat Requirement	Description of activity	Timescale/Progress
	Where appropriate, ensure that all aggregated and non-personal information that collected is made available for others to use, in the interests of transparency and avoiding duplication.	<p>Human application annual activity data is published by Eurocet (http://www.eurocet.org/).</p> <p>Other sector specific reports are published on the HTA's website. For example we recently published information on mortuary capacity and contingency based on compliance data collected in 2015.</p> <p>We also publish shared learning from the incident reports we receive in the post mortem sector.</p> <p>In this business year we will consider publication of shared learning documents based on incident reporting in other sectors that we regulate.</p>	Develop a plan for dissemination of shared learning from serious adverse event and reaction reporting in the human application and ODT sectors by December 2016.
	Agree with the HSCIC an annual MOU which sets out each organisation's commitment to an agreed reduction in data collections that are undertaken outside the national process managed by the HSCIC;	<p>The HTA's strategic objectives show we are committed to reducing regulatory burden where the risk to public confidence is lowest, and to making continuous improvements to our processes to minimise wasted or duplicated effort.</p> <p>The HTA has produced this burden reduction plan in partnership with HSCIC, and will continue to work with HSCIC as required.</p>	Burden reduction plan to be reviewed annually in conjunction with HSCIC.

Date	Concordat Requirement	Description of activity	Timescale/Progress
	<p>Making better use of technology to introduce more efficient ways of acquiring the information, especially by moving away from manual collections to automated extractions of data directly from local systems, and using existing data held nationally;</p>	<p>All existing data collections are via the HTA secure portal.</p> <p>The HTA has carried out a licensing and inspection review which has highlighted areas where technology (in particular the HTA portal) could make acquiring and disseminating information generally more efficient.</p> <p>In the first instance we will be using the portal to issue HTA licence documentation to eliminate the manual process, but we will continue to improve and streamline systems including the website and our front end Portal, which will also have benefits for our data collection activities.</p>	<p>Launch of portal certification project Q1 2016.</p> <p>Continuous improvement of data collection systems during 2016/17 business year.</p>
	<p>Ensuring that the collections and extractions are aligned with robust professional practice, such as NICE or other professional guidelines, and information standards;</p>	<p>All information is collected in line with relevant legislation and the requirements of the Security Policy Framework.</p> <p>We will contact HSCIC/SCCI to discuss any future collections to ensure that these are aligned with any applicable guidelines.</p>	<p>We will review our datasets and investigate the available standards and where appropriate plan how to incorporate these into our data collections – March 2017.</p>

Date	Concordat Requirement	Description of activity	Timescale/Progress
	Reducing and retiring those national requests for information that are no longer needed or justifiable	<p>As we only collect the minimum data necessary to perform our regulatory functions, we have not needed to retire any requests for information.</p> <p>Our collections will be kept under review, along with their frequency and nature, to ensure that we continue to only collect the minimum information necessary.</p> <p>During 2016/17 we will conduct a review and report on our requirements for compliance updates in the sectors we regulate under the Human Tissue Act.</p> <p>This year we intend to review our Information Governance policy to ensure it reflects our commitment to only collecting the minimum data necessary to perform our regulatory functions, the process for agreeing any new collections and arrangements for how we review existing collections. We will also publish our approach on our website.</p>	<p>Review and scope compliance updates for all sectors regulated under the HT Act – will include review of information collected to ensure it is still needed and justifiable – March 2017</p> <p>Review Information Governance Policy and publish approach on website – March 2017</p>
	Keep these arrangements under regular review and contribute to the HSCIC's annual report detailing their progress in reducing burden, with clear reference to the targets agreed in the MOU.	<p>The HTA completed its initial burden reduction plan in conjunction with HSCIC in September 2014.</p> <p>The HTA will continue to work closely with HSCIC and provide information upon request.</p>	

Date	Concordat Requirement	Description of activity	Timescale/Progress
	Work closely with the HSCIC on the three year review of existing data collections to make sure that collections are still necessary, are not being collected elsewhere, and are collected in the most efficient and least burdensome way possible	<p>The HTA has previously worked with BAAS to review and update our data existing collections.</p> <p>The HTA will continue to work closely with HSCIC/BAAS and other ALBs when reviewing existing data collections, particularly to ensure that the information we seek is not being collected elsewhere and is collected in the most efficient and least burdensome way possible.</p>	
	Work closely with the HSCIC when designing new data collections to ensure that they are not duplicating any other existing data collection and that they are designed in a way to minimise burden on the service	The HTA currently does not have plans for any new data collections, but will work closely with HSCIC on any future collections.	

Activities Undertaken

The HTA's overall goal is to maintain public confidence by ensuring that the removal, storage and use of human tissue and organs are undertaken safely and ethically, and with proper consent. We aim to deliver right-touch regulation targeting our resources where there is most likelihood of non-compliance and greatest risk to public confidence.

In line with the Government's Better Regulation agenda, we have strategic objectives to reduce regulatory burden where risks to public confidence are lowest, make it clearer how to achieve compliance with new and existing regulatory requirements and to make continuous improvements to our systems and processes to minimise wasted or duplicated effort.

In the last business year the HTA undertook a review of licensing and inspection processes across the organisation. This review has highlighted a number of areas where development could potentially reduce burden more generally across our regulatory activity, and implementation of these has been incorporated into our business plan for 2016/17 and

beyond. One example is the development of the HTA's portal to issue licence documentation, replacing the manual paper process. It is estimated that this will deliver approx. 350 hours per annum in capacity release for the HTA which can be redeployed in better ways, as well as reducing burden for our licensed establishments by reducing the end-to-end time taken to process licence applications and variations by a number of days. This business year we have also committed to revising our representations and appeals process to make it clearer, more transparent and less burdensome to challenge certain licensing decisions.

3 Next steps

The Human Tissue Authority has put together a plan to review collection requirements, processes and to consider areas where further reductions in burden could be made. This burden reduction plan will be reviewed by the Human Tissue Authority and the HSCIC on an annual basis.

4 Appendix A - The Department of Health (DH) Reducing Burden of National Request for Information: Concordat

The DH 'Reducing burden of national requests for information' concordat is available here:

<https://www.gov.uk/government/publications/reducing-burden-of-national-requests-for-information-concordat>