

REPORT OF A BREACH OF THE CODE OF PRACTICE FOR STATISTICS

1. Core Information [\[guidance\]](#)

Title and link to statistical output	Patients registered at a GP Practice
Name of producer organisation	NHS Digital
Name and contact details of person dealing with report	Steve Barber-Hayes, NHS Digital; Stephen.barber1@nhs.net
Link to published statement about the breach (if relevant)	
Date of breach report	12 th December 2019

2. Circumstances of breach [\[guidance\]](#)

Relevant principle(s) and practice(s)	Accidental or wrongful early release (Principle T3, Practices T3.3, T3.4, T3.6)
Date of occurrence of breach	12 th December 2019
<p>The Patients registered at a GP Practice December 2019 publication was originally scheduled to be published at 09:30 on the 12th December. It was moved to 09:30 on the 13th December, however, due to the general election. The publication was released early due to human error using the NHS Digital Content Management System (CMS). The publication was mistakenly published at 16:30 on 11th December. As no media coverage was apparent the decision was made to remove the page and republish at 09.30 on 13th December as planned.</p> <p>The process to produce the publication was being completed by a member of the team who hadn't completed the process before and was following a guidance document. Due to ambiguity in the guidance document and the lack of experience of the analyst, the option selected to send the publication for responsible statistician approval was incorrect. 'Publish (request)' was selected instead of 'Schedule publication (request)', which results in release once approved. The mistake was not seen by the approver and the publication was approved. The publication was therefore released before the planned release date.</p>	

3. Impact of the breach [\[guidance\]](#)

<p>The publication went live at 16:30 on 11th December and was removed at 13:15 on 12th December when this issue was discovered. The publication was live for approximately 21 hours on the publication page on the website but was not publicised anywhere else on the website.</p> <p>The download statistics for the publication show the publication was downloaded 89 times; see below for the breakdown. For context, the previous release of the publication received 1,560 downloads in a month. We are not aware of it being picked up in any media reporting or generating any political interest in advance of when it should have been published.</p> <p>As a result of this lack of media and political interest, the decision was made to withdraw the publication and re-release at the planned time. Had interest been generated, withdrawal could have been perceived to be political, and alternative options would have been considered.</p>

Given the above factors and the sensitivity of the timing we believe this is a medium impact breach.

Download	Total Events
gp-reg-pat-prac-all.csv	44
gp-reg-pat-prac-sing-age-regions.csv	12
gp-reg-pat-prac-map.csv	10
gp-reg-pat-prac-sing-age-female.csv	10
gp-reg-pat-prac-quin-age.csv	8
gp-reg-pat-prac-sing-age-male.csv	5

4. Corrective actions (taken or planned) to prevent re-occurrence [\[guidance\]](#)

The circumstances of the breach, and possible issue with our content management system has been raised with the appropriate teams at NHS Digital. We are evaluating a technical solution to prevent publications from being released early and to safeguard against human error; for example, ensuring no changes to planned publications can be implemented until the day of the publication.

The incident has also driven discussions to ensure we are implementing systems correctly and improving knowledge to avoid breaches in the future. All guidance in the Primary Care Domain has been updated with information on the Content Management System (CMS) and how to request approval for the publications.

The Primary Care Domain will work closely with the Statistical Governance team to ensure the issue is understood, and that the lessons learnt from the breach are captured and acted on to prevent re-occurrence across NHS Digital publications.

Guidance has been sent to the responsible statisticians to ensure they are checking the publication scheduling carefully when approving CMS updates. The Statistical Governance team has ensured all guidance and training material is up to date. This has been re-distributed to ensure that teams have current copies available.

NHS Digital will also review the situation of an inexperienced member of staff being given responsibility for preparing a publication with only ambiguous guidance provided.