

National Oesophago-Gastric Cancer Audit (NOGCA)

Outlier Policy

Updated January 2025

1. Introduction

This policy sets out the process that the National Oesophago-Gastric Cancer Audit (NOGCA) will implement when results for an NHS organisation (NHS Trust in England or a Local Health Board in Wales) deviate from the expected range of values for outcomes published in the annual NOGCA State of the Nation Report. This process is to support quality assurance and quality improvement.

This policy applies to data published in the National Oesophago-Gastric Cancer Audit (NOGCA) State of the Nation report, publication January 2025.

Updates to the outlier policy

The NOGCA Outlier Policy is reviewed on an annual basis, and is based on [HQIP's NCAPOP Outlier Guidance](#).

The NOGCA Outlier Policy was last updated January 2025.

Please direct any feedback or questions about this policy to OGcanceraudit@rcseng.ac.uk.

2. Key principles for outlier management

a) Performance indicators

NOGCA performance indicators are selected to provide a measure of the quality of care delivered by NHS healthcare providers (NHS Trusts or Local Health Boards) for people diagnosed with oesophageal or gastric (OG) cancer.

Details about the construction of indicators and the cohorts to which they apply are provided in a separate document of [NOGCA metrics](#).

This Outlier Policy (January 2025) applies to the following indicator:

- 90-day survival rate after surgery with curative intent (case-mix adjusted¹), among people diagnosed with oesophageal or gastric cancer April 2020-March 2023.

¹ To ensure that the comparison of outcomes across healthcare providers takes into account differences in the mix of patients treated by each Trust/LHB, we adjust results for measurable factors such as age, sex, cancer stage, and patient fitness.

b) Expected performance

The NOGCA defines the expected level of performance for each indicator in relation to the average value, separately for England and Wales. An expected range of performance for each indicator is defined using statistically defined control limits, which lie either side of the national average values.

The assessment of performance involves two sets of control limits. The first (inner) limit identifies whether an indicator value for a Trust/Local Health Board is more than two standard deviations from the national (expected) level; this might happen because of random variation every 1 in 20 occasions. The second (outer) limit identifies values that are more than three standard deviations from the national level; this might happen because of random variation every 1 in 500 occasions.

c) Data quality

Alongside the performance indicators, the NOGCA reports on the quality of data submitted by hospitals for each patient included in the Audit.

The NOGCA produces quarterly reports to support NHS organisations (currently England only) to review the completeness of data items that are used in producing the case-mix adjusted indicators. The accuracy and completeness of submitted patient data are the responsibility of the NHS organisations providing the care.

d) Outlier identification

There are two types of statistically defined outliers: “Alert” and “Alarm”

Definition of an Alarm:

Indicator value is more than three standard deviations from the national average.

Definition of an Alert:

Indicator value is more than two standard deviations but within three standard deviations of the national average. Trusts/Local Health Boards with indicator values identified as an Alert will have their data analysed further in a second step using an appropriate continuous monitoring technique such as a risk-adjusted CUSUM or EWMA chart². Trusts/Local Health Boards that are flagged by the continuous monitoring analysis will be classified as an Alarm.

Definition of a potential outlier:

- (i) Trusts/Local Health Boards with indicator values identified as an Alarm.
- (ii) Trusts/Local Health Boards with indicator values identified as an Alert and flagged as an Alarm in further continuous monitoring analysis.

The responses of confirmed outliers will be published online alongside the publication of the annual NOGCA State of the Nation report.

² See Cook et al *BMJ Qual Saf* 2011; 20: 469e474. doi:10.1136/bmjqs.2008.031831

3. Outlier Reporting Process and Timeframes

The following actions and timeframes will be implemented by the NOGCA for NHS organisations identified as potential outliers (see Section 2).

Step	Action	Owner	Within working days
1	For NHS Trusts/Local Health /Boards (LHBs) with a performance indicator identified as a potential outlier, the NOGCA Project Team to scrutinise data handling and analyses to determine whether: (a) Outlier status not confirmed - <i>document and close</i> (b) Potential outlier status confirmed - <i>go to step 2</i>	NOGCA Project Team	10
2	Trust/LHB 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 the Lead Clinician as required.	NOGCA Project Team	5
3	Trust/LHB Lead Clinician to provide written response to NOGCA Project Team.	Trust/Local Health Board Lead Clinician	25
4	NOGCA 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>	NOGCA Project Team	20
5	NOGCA Project Team to contact Trust/LHB Lead Clinician by telephone, prior to sending written notification of confirmed outlier status to Trust/LHB CEO and copied to Trust/LHB Lead Clinician and Medical Director. All relevant data, statistical analyses and earlier response from Trust/LHB Lead Clinician made available to Trust/LHB Medical Director and CEO.	NOGCA Project Team	5
	<table border="0"> <tr> <td style="vertical-align: top;"> <p>England</p> <p>Outlier confirmation letter to also include details in step 7 below, and request that the Trust engage with their CQC local team.</p> <p>Provide NOGCA Outlier Policy to Trust.</p> <p>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> </td> <td style="vertical-align: top;"> <p>Wales</p> <p>Notify NHS Wales and HQIP to confirm Local Health Board outlier status, requesting confirmation of receipt.</p> </td> </tr> </table>		
<p>England</p> <p>Outlier confirmation letter to also include details in step 7 below, and request that the Trust engage with their CQC local team.</p> <p>Provide NOGCA Outlier Policy to Trust.</p> <p>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>Wales</p> <p>Notify NHS Wales and HQIP to confirm Local Health Board outlier status, requesting confirmation of receipt.</p>		

6	<p>England</p> <p>Proceed to public disclosure of comparative information that identifies Trusts with outlier status.</p> <p>Trusts that have an outlier investigation, that they or others have performed, will have details of the investigation published as an addendum to the annual NOGCA State of the Nation Report. Publication in January 2025 will not be delayed whilst waiting for such investigation to be completed. This will be added if it subsequently becomes available.</p> <p>If no response received from the Trust, this will be documented on the applicable NOGCA webpage.</p>	<p>Wales</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>Local Health Board CEO informed that the NOGCA will publish information of comparative performance which will identify Trusts/LHBs.</p>	<p>England: NOGCA Project Team</p> <p>Wales: LHB CEO</p>	<p>England: NOGCA State of the Nation Report publication date: Jan 2025</p> <p>Wales: 10</p>
7	<p>England</p> <p>The CQC advise that during their routine local engagement with Trusts, their inspectors will:</p> <ul style="list-style-type: none"> - 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 - Ask the Trust how they are monitoring or plan to monitor their performance - Monitor progress against action plan if one is provided by the Trust. 	<p>Wales</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>England: CQC</p> <p>Wales: Health Inspectorate Wales (HIW)</p>	<p>Determined by CQC and HIW</p>
	<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>Wales N/A</p>	<p>Trust Medical Director</p>	
	<p>Investigation details published by the NOGCA, alongside the annual State of the Nation report. If no response, the NOGCA will publish this absence of response.</p>	<p>Wales N/A</p>	<p>NOGCA Project Team</p>	

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