


Scotland and Northern Ireland EQA Scheme in General Histopathology

EQAO05

CONFIDENTIALITY AND FEEDBACK TO PARTICIPANTS

ISO 17043:2010 ref	4.9, 4.10
LOCATION OF COPIES	Q-Pulse (Electronic Master) Master Copy held by Quality Manager Standard Operating Procedures – Scottish Pathology Network
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Review and Amendment History			
Date Reviewed / Amended	Version Replaces	Pages Changed	Details of review/Amendment
Feb 2021	1.9	3 Pages (Front, 2 & 4)	<u>Updated</u> : location of copies (front pg), scheme secretary email details (pg4). <u>Added</u> : Table of Contents (pg2).

Table of Contents

1	RATIONALE	3
2	CONFIDENTIALITY/DATA PROTECTION ACT/GENERAL DATA PROTECTION REGULATIONS (GDPR)	3
3	PRIVACT POLICY	3
3.1	WHAT WE COLLECT.....	4
3.2	WHAT WE DO WITH THE INFORMATION WE GATHER.....	4
4	SECURITY	4
5	CONTROLLING YOUR PERSONAL INFORMATION	4
6	FEEDBACK TO PARTICIPANTS	4

1 RATIONALE

To ensure confidentiality and provide information on the Data Protection Act and general Data Protection Regulations, along with timely and accurate feedback to participants.

2 CONFIDENTIALITY/DATA PROTECTION ACT/GENERAL DATA PROTECTION REGULATIONS (GDPR)

The Scheme Secretary receives and keeps a record of all communication and responses from participants in a manner which ensures confidentiality.

The system guarantees that the Scheme Administrator remains unaware of individuals and/or their performance. This is achieved by a confidential numeric code system generated by the Data Administrator. The Scheme Secretary has a list of EQA Scheme participants in paper form with a note of the numeric code for each participant. This paper record and the computer database represent the only link between the codes and the participants' name. The paper record is kept in a locked cabinet and is not made available to the Scheme Administrator, while the database is encrypted and password protected.

The Chairperson of the Management Committee communicates with participants when required on a personal basis by their code number only through the Scheme Secretary. Any confidential material from the Administrator is passed to the Scheme Secretary with only the relevant code number exposed, such that the communication is placed in an appropriately addressed envelope by the Scheme Secretary without the Secretary having to read the contents of the communication.

The link between participant names and code numbers may be divulged by the Scheme Secretary only under two circumstances:

1. In writing to a participant who requests a reminder of his/her code number. Code numbers must not be divulged by telephone.
2. In writing to the Chairman of the Histopathology/Cytopathology National Quality Assurance Advisory Panel of the Joint Working Group on Quality Assurance, in order to investigate appropriately a case of persistent substandard performance in the EQA Scheme under the terms of SOP **EQAO07**.

No EQA result may be divulged to any other authority without the written permission of the participant.

The following paragraph represents current guidance from the RCPATH EQA Steering Committee regarding the position with regard to confidentiality and the data protection act (issued May 2007).

'Under normal circumstances, the facts of your participation and detailed results will not be disclosed to a third party. If you wish the scheme to provide evidence of your participation and/or results to a third party of your choosing, this can be provided following your express written permission. Under the Freedom of Information Act we are not sure of whether we will be expected to disclose information of either participation or results but until legal precedence is established, we would plan not to do so.'

3 PRIVACY POLICY

A privacy policy was introduced in December 2018 to comply with new EU General Data Protection Regulation (GDPR) laws.

The General Histopathology EQA scheme is committed to ensuring that your privacy is protected. The Organisers of the scheme may change this policy if required by updating this document and any changes will be circulated by e-mail. This policy is effective from 1st January 2019.

3.1 What we collect

We may collect the following information:

- Name and job title
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Other information relevant to keeping the EQA records up to date.

3.2 What We Do With the Information We Gather

We require this information to operate the EQA Scheme, and in particular for the following reasons:

- Internal record keeping.
- To provide clear feedback and scoring for EQA Circulations.
- To provide personalised CPD certificates

We may periodically send other information which we think you may find interesting using the email address which you have provided. We may contact you by email, phone, or mail.

4 SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

5 CONTROLLING YOUR PERSONAL INFORMATION

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you, please email to: linda.mcdonald3@nhs.scot

If you believe that any information we are holding on you is incorrect or incomplete, please email us as soon as possible, at the above email address. We will promptly correct any information found to be incorrect.

6 FEEDBACK TO PARTICIPANTS

The Scheme Secretary emails or posts results to the participants, along with any general information which the Management Committee deems necessary.

A computer report, the provisional results sheet (see SOP **EQAO06**), is emailed to all participants in the circulation. This shows the marked response by each participant in the round by confidential code and allows each participant in the Scheme to see their own performance in each case as compared to that of the other participants. The report also allows participants to see the overall response to any particular case.

Thereafter the cases from the EQA circulation under consideration and results are presented, usually within two to three weeks, as part of the Caledonian Branch Meeting of the Association of Clinical Pathologists to which all participants are invited to attend.

Cases in which there is complete unanimity in respect of the diagnosis will not be subject to further consideration. The management committee will consider any suggested changes to provisional diagnoses and scoring but will retain the ultimate decision for final scoring of all diagnoses. Following this meeting, any amendments to the scoring of a case are implemented and a new results sheet containing the final agreed scores posted to all participants, along with CPD certificates within two weeks.

Each individual's sheet also contains a record of their past totals for each circulation. A letter from the Scheme Administrator and a copy of the minutes from the most recent participants meeting held within The Caledonian Branch of The Association of Clinical Pathologists are emailed to participants informing them of postage of final agreed results. A definitive results sheet is created as a permanent record of the circulation. In every circulation, each participant who falls within the 2.5% group at the lower end of the ranked scores is informed (see SOP **EQAO07**).

Prior to circulation deadline date all participants are given two reminders of this via email/phone calls. These reminders are recorded by the Scheme Secretary.