

# Qpoint Privacy Policy

[www.nhsqpoint.org.uk](http://www.nhsqpoint.org.uk)

In order to provide the full range of services, Qpoint sometimes need to collect information about you.

This Privacy Policy explains the following:

- what information Qpoint may collect about you;
- how Qpoint will use information collected about you;
- when Qpoint may use your details to contact you;
- how Qpoint protects your information;
- whether Qpoint will disclose your details to anyone else;
- your choices regarding the personal information you provide to Qpoint; and
- the use of cookies on the Qpoint website and how you can reject cookies.

Qpoint is committed to safeguarding personal information (PI). Whenever you provide PI, Qpoint are legally obliged to use your information in line with all laws concerning the protection of PI, including the Data Protection Act 2018. Q Point processes your PI to support the Trust's delivery of healthcare through the quality assurance of medical devices (Article 6 1e of the General Data Protection Regulation (GDPR)), or to deliver a service to which you have contracted (Article 61b of GDPR).

## **What personal information do Qpoint collect from the people that visit the Qpoint website?**

When registering for Qpoint services on the website, by telephone or email, you will be asked to provide your full name, email address, postal/work address, phone number,

profession, details relating to the point of care testing (POCT) devices you use and other details to help Qpoint provide you with the full range of services.

### **When do Qpoint collect information?**

Qpoint collect information from you when you register for any Qpoint Scheme, submit an enquiry or participate in Qpoint services. A record of any communications you have with Qpoint and all the results you submit to the Qpoint External Quality Assessment Scheme (EQAS) is maintained on the Qpoint database with your PI and will be retained for 10 years from last date of contact, then securely destroyed.

### **How does Qpoint use your information?**

Qpoint may use the information collected from you in the following ways:

- To improve the Qpoint website.
- To efficiently process your registration/enquiry/complaint.
- Evaluate the performance of your POCT device.
- Escalate matters of non-compliance/poor performance to relevant parties.
- To contact you with relevant information pertaining to your registration.
- To send periodic emails regarding your Qpoint registration.

The results you submit to the Qpoint EQAS are required for comparison to other users of the same device to assess how well your results agree. Qpoint keep a record of your communications in order to take appropriate follow up action as required to facilitate service delivery.

### **If you are a healthcare professional:**

Qpoint will have cause for concern if you fail to respond to repeat red light reports and improve your performance on the scheme, or continually fail to submit results. In such an event your personal details, record of your compliance on the Qpoint EQAS (how frequently you return a result) and what scores you achieve will be shared with the manufacturer of

your POCT device, the National Quality Assurance Advisory Panel (NQAAP) within the UK and with any third party to whom you are professionally accountable (e.g. Governance lead, Manager, Co-ordinator). If you are a healthcare professional that does not practice in the UK, the equivalent overseas bodies may be notified.

**If you are a home user:**

Whenever Qpoint have cause for concern, (for example, if you do not seem able to produce good quality results) your information and performance record may be shared with the manufacturer of your POCT device. This will enable the manufacturer to offer assistance should you require it.

**All registered Qpoint participants:**

The EQA results submitted from all Qpoint participants will be used anonymously within cohorts of device type to run statistical analyses and evaluations. These results will be made available within the Qpoint Annual Report and will enable both manufacturers and Qpoint to improve the quality of their products. They will also be used to aid development of professional standards and help assure clinical effectiveness of POCT devices.

In exceptional circumstances, a regulatory body may require EQA results to be supplied directly to the authority by Qpoint, if this occurs, affected participants will be notified in writing.

**How do Qpoint protect your information?**

The Qpoint website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to the site as safe as possible. It is also scanned regularly for Malware.

Your PI is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via

Secure Socket Layer (SSL) technology, with intrusion detection and a web application firewall.

All data relating to transactions are processed through SagePay, a PCI compliant company. This information is not held by Qpoint or DCSL Software Ltd.

### **Does Qpoint use 'cookies'?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognise your browser and capture and remember certain information. If you accept, Qpoint may use cookies to gather the following data:

- Internet Protocol (IP) address
- Date and time of site access
- Specific pages you visit

### **Why do Qpoint use cookies?**

This information is solely used to compile aggregate data about site traffic and site interaction to improve site experiences and tools in the future.

You may set your browser to notify you when you receive a cookie or to refuse receiving it. By changing your browser settings, you can also determine that your browser will not accept cookies from this website.

If you do not accept the cookies, it will not affect your online experience with Qpoint.

### **Third-party disclosure**

#### **If you are a healthcare professional sponsored by a manufacturer:**

Your name, contact details and device data can be accessed from the Qpoint database by the manufacturer of your POCT device, with whom Qpoint has a signed confidentiality agreement. This will enable the manufacturer to offer assistance if your Qpoint reports indicate that you may have a problem with your POCT device. Device data that you have

submitted to Qpoint may be shared with POCT device manufacturers to facilitate financial calculations or statistical analysis. This data is anonymous and is used by the manufacturers to audit their accounts and improve their products. Information will also be shared with your nominated, Qpoint co-ordinator. If Qpoint has any cause for concern with regard to the results you submit to the EQA Scheme or a failure to improve quality, Qpoint are also obliged to give your personal details and Qpoint data record to the National Quality Assurance Advisory Panel (NQAAP) within the UK (see “How do Qpoint use your information?”) and any third party to whom you are professionally accountable (e.g. Governance lead, Manager, Co-ordinator). If you are a healthcare professional that does not practice in the UK, the equivalent overseas bodies may be notified. Personal details and device data may be infrequently accessed by the United Kingdom Accreditation Service (UKAS) who are required to inspect and audit the Qpoint EQA Scheme, and the software developers (DCSL Software Ltd.) who service and support the database. Such employees have a duty to keep any information observed during the course of their work confidential. Your personal information will not be passed to any other third parties without obtaining your consent.

**If you are a home user:**

Your name, contact details and device data cannot be accessed from the Qpoint database by the manufacturer of your POCT device but if your Qpoint reports suggest that you require assistance, Qpoint may pass your information to the manufacturer of your device, with whom Qpoint has a signed confidentiality agreement. This will enable the manufacturer to offer assistance and assure the quality of your test results. Device data that you have submitted to Qpoint may be shared with POCT device manufacturers to facilitate financial calculations or statistical analysis. This data is anonymous and is used by the manufacturers to audit their accounts and improve their products. Personal details and device data may be infrequently accessed by the United Kingdom Accreditation Service (UKAS) who are required to inspect and audit the Qpoint EQA Scheme, and the software developers (DCSL Software Ltd) who service and support the database. Such employees have a duty to keep any information observed during the course of their work confidential.

Your personal information will not be passed to any other third parties without obtaining your consent.

### **Third-party link**

Qpoint do not include or offer third-party products or services on the website.

### **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles.

They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

Qpoint have not enabled Google AdSense but may do so in the future.

### **Qpoint agree to the following statements:**

- Users can visit the Qpoint site anonymously.
- Once this privacy policy is created, a link to it is added to our home page or as a minimum, on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can be easily found on the page specified above.
- If a data breach should occur, you will be notified via email/telephone or via the website as soon as possible.

### **Changes to the Privacy Policy:**

You will be notified of any Privacy Policy changes on the Privacy Policy Page

### **Changing your personal information:**

You can change your personal information at any point via:

- Email
- Telephone

- The account details page (once logged onto the website)
- The 'send us an email' function of the website

### **How does the Qpoint website handle Do Not Track signals?**

Qpoint does not utilise tracking cookies.

### **Does the Qpoint website allow third-party behavioural tracking?**

Qpoint does not utilise tracking cookies.

### **Email notifications**

Qpoint collect your email address in order to:

- Send information, respond to enquiries, and/or other requests or questions.
- Process registrations and to send information and updates pertaining to these registrations.

As such, Qpoint agree to the following:

- not to use false or misleading subjects or email addresses;
- identify messages in a reasonable way;
- include the physical address of the Qpoint site/headquarters;
- honour opt-out/unsubscribe requests swiftly; and
- allow users to unsubscribe by contacting Qpoint.

If, at any time you would like to unsubscribe from receiving future emails, you can email Qpoint at [office.qpoint@nhs.net](mailto:office.qpoint@nhs.net) to be promptly removed from email correspondence.

## Contacting Qpoint

If there are any questions regarding this privacy policy, you may contact Qpoint using the information below or contact the Trust's Data Protection Officer email: [information.governance@fhft.nhs.uk](mailto:information.governance@fhft.nhs.uk)

Qpoint Quality Laboratory  
Aldershot Centre for Health  
Hospital Hill  
Aldershot  
Hampshire  
GU11 1AY

**Email:** [office.qpoint.nhs.net](mailto:office.qpoint.nhs.net)

**Tel:** 01252 335396

**Web:** [www.nhsqpoint.org.uk](http://www.nhsqpoint.org.uk)

Qpoint March 2018