



Records Management Policy		Version 1.0	
Statement Prepared by:	Statement Approved by:	Date Next Review Due:	1/3/26
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1. Introduction

- 1.1 This Pharmacy Group is dependent on its records to operate efficiently and meet its statutory responsibilities. An effective records management system is critical in the provision of services to patients and to assist in the efficient running of the Pharmacy.
- 1.2 This policy will ensure that adequate records are maintained, managed and controlled effectively. This will support the confidentiality, integrity and availability of all information held and/or used by the Pharmacy.

2. Purpose

- 2.1 This policy and supporting procedures will define the way in which all records, including patient, personal and business records, will be managed throughout the Pharmacy.

3. Scope

- 3.1 This policy applies to all staff, including permanent, temporary, students/trainees, secondees, volunteers and contracted third parties, within the Pharmacy.

4. Aims and Objectives

- 4.1 This policy and its supporting procedures aim to ensure that:
 - **records are available when needed** - from which the Pharmacy is able to form a reconstruction of activities or events that have taken place;
 - **records can be accessed** – having a ‘File Structure’ enables the Pharmacy to operate efficiently with the introduction of a common file naming convention for manual and electronic records;



- **records can be interpreted** - the context of the record can be interpreted: who created or added to the record and when, and how the record is related to other records;
- **records can be trusted** – the record reliably represents the information that was actually used in the particular process, and its integrity and authenticity can be demonstrated;
- **records can be maintained through time** – the qualities of availability, accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, despite changes of format;
- **records are secure** - from unauthorised or inadvertent alteration or erasure. That access and disclosure are properly controlled to ensure appropriate levels of confidentiality and audit trails will track all use and changes. To ensure that records are held in a robust format which remains readable for as long as records are required;
- **records are retained and disposed of appropriately** – creating and maintaining an Information Asset Register, will identify the type of record, its classification and where it is located at all times and includes provision for appraisal of records. The retention and destruction of records will be managed in line with the current guidelines (see Reference section below); and
- **staff are trained** - so that all staff are made aware of their responsibilities for record creation and record management.

All Patient Medications Records PMR are maintained on the IT system; and can only be accessed via the personal username and password of individual staff members. This ensures any activity on the PMR is recorded to each individual.

PMR systems are located on computer hardware (PCs) in “Safe Haven” areas of a pharmacy branch (usually the Dispensary); physical access to premises is restricted, unless consent obtained by the Superintendent or Branch Manager, whereby there must be two persons present to access a branch, one being a registered keyholder to enter any areas where PMR systems are located.

5. Responsibilities

- 5.1 The Lead for Information Governance and IT Security (The Data Controller) has overall responsibility for records management within the Pharmacy, and the implementation of this policy and associated procedures, for manual and electronic records. They will ensure that appropriate mechanisms are in place to support service delivery and continuity.

5.2 The Data Controller will have particular responsibility for ensuring that the Pharmacy meets its legal responsibilities regarding the management of personal and business information and for reflecting patients' interests regarding the use of patient identifiable information. They are responsible for ensuring patient identifiable information is shared in an appropriate and secure manner.

5.3 The Data Controller, supported by the Data Protection Officer where appropriate, will raise staff awareness for good records management practice and promoting compliance with this policy in such a way as to ensure the easy, appropriate and timely retrieval of information.

5.4 All Pharmacy staff who create, receive and use records have records management responsibilities and must manage those records in keeping with this policy and associated procedures.

6. Policy Implementation and Monitoring

6.1 All staff will be made aware of the Policy and supporting procedures. Breach of this policy may lead to disciplinary action being taken. Depending on the circumstances this could range from remedial training to dismissal.

6.2 Monitoring compliance with this policy will be achieved by undertaking regular audits.

6.3 This policy will be reviewed annually and as and when there are any associated legislative changes.

7. References

7.1 Supporting Policies, Procedures and Guidelines

- Information Governance and IT Security Policy
- Data Protection, Confidentiality and Subject Access Procedure
- Freedom of Information Act and Environmental Information Regulations Procedure
- Incident Reporting Procedure
- Safe Haven Guidance
- Removal, Storage and Transportation of Patient Identifiable Information Guidance
- System Access Procedure
- Recommendations for safe storage of records
- System Back Up Procedure
- Disposal of IT Equipment and Media Procedure
- Business Continuity Plan



7.2 Legislation and Guidance

The Freedom of Information Act 2000

The Environmental Information Regulations 2004

The Data Protection Act 2018

UK GDPR

The Human Rights Act 1998

Public Records Act 1958

The Lord Chancellor's Code of Practice on the management of records issued under section 26 of the Freedom of Information Act 2000

The Caldicott Report 1997

DH - Code of Practice of Openness in the NHS

DH – Records Management: NHS Code of Practice (2006)

Welsh Health Circular (WHC) - For the Record - WHC (2000) 71