

SOP 25. Management of Access to Confidential Files

UPCHE REC SOP 25/03

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25.1. Policy Statement

Access to REC confidential files shall be regulated and limited to REC members and staff. Individuals or non-members with legitimate interest in these files (e.g. institutional authorities, regulatory agencies, sponsors) shall be allowed to access specific files with proper justification. Researchers/Investigators shall be allowed access only to their own protocol files upon request.

25.2. Objective

Proper management of confidential files in the REC aims to ensure protection of the intellectual property rights of researchers and simultaneously enhance the integrity of the REC.

25.3. Scope

This SOP includes procedures for accessing confidential files including document handling and distribution. This SOP begins with the receipt of the request to access and ends with the return of the documents to the protocol folder.

25.4. Workflow for Management of Access to Confidential Files (5 working days)

	ACTIVITY	PERSON RESPONSIBLE	TIMELINE*
1	Receipt of request for access to confidential files	Administrative Secretary	1
2	Approval of request for access and retrieval of documents	Member Secretary or Chair	2
3	Supervision of the use of retrieved document	Administrative Secretary	1
4	Return of the document to the files	Administrative Secretary	1

^{*}working days

25.5. Description of Procedure

25.5.1. Receipt of request for access to confidential files:

- The Administrative Secretary receives requests for access to confidential REC files and records all requests in the Log of Request for Copies of Documents (Form 40).
- b. The UPCHE REC considers the following as confidential:



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- i. Study protocols
- ii. Study protocol-related documents (case report forms, informed consent documents, diary forms, scientific documents, expert opinions or reviews)
- iii. Meeting Minutes
- iv. Decisions, action letters/notification of UPCHE REC decision, approval letters
- v. Study protocol-related communications
- vi. Membership files

25.5.2. Approval of request for access and retrieval of documents:

- a. The Chair or Member Secretary assesses the reason for the request and approves it if found legitimate and satisfactory.
- The Administrative Secretary asks the individual requesting access to the files to sign the confidentiality agreement and proceeds to retrieve the pertinent document.
- c. Non-members can access specific documents upon formal request and completion/signing of Form 41 [Confidentiality Agreement for Nonmembers]. The form requires the approval of the Chair.
- d. Regulatory authorities have access to UPCHE REC files provided it is within the mandate of the said authority, and upon reasonable notice to make the files available.
- e. All REC members and Administrative Secretary with a signed Form 2 [confidentiality agreement and conflict of interest disclosure] can have access to UPCHE REC confidential documents upon request.

25.5.3. Supervision of the use of retrieved document:

- a. The Administrative Secretary asks the user to sign the logbook and enforces the restriction to room-use of documents. For soft copies, the requested copies will be sent to the REC members via email.
- b. The Administrative Secretary makes only the exact number of copies requested.

25.5.4. Return of the document to the files:

- a. The Administrative Secretary returns the retrieved documents to the proper file. Physical files are kept in cabinets in the REC office with a lock and key.
- b. The Secretariat (Member Secretary and Administrative Secretary) hold the keys to the locks.
- c. On the other hand, electronic files are password-protected and are stored in a computer inside the REC office

25.6. Forms

For this SOP, the following form(s) were utilized:



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- Form 2: Confidentiality Agreement and Conflict of Interest Disclosure
- Form 40: Log of Request for Copies of Documents
- Form 41: Confidentiality Agreement for Non-Members

25.7. Document History

Version	Date	Authors	Main Change(s)
No.			
01		Maria Patricia V. Azanza, Ph.D. Joanne R. Bantang, Ph.D. Cecile Leah T. Bayaga, Ph.D. Kristyn T. Caragay Charla Rochella S. Saamong Mary Anne Ramos-Tumanan, Ph.D. Casiana Blanca J. Villarino, Ph.D. Fredelyn S. Gascon	First draft
02	04 December 2020	Maria Patricia V. Azanza, Ph.D Joanne R. Bantang, Ph.D. Cecile Leah T. Bayaga, Ph.D. Kristyn T. Caragay Charla Rochella S. Saamong Mary Anne Ramos-Tumanan, Ph.D. Casiana Blanca J. Villarino, Ph.D. Fredelyn S. Gascon	References: Removed the list of references from this SOP and collated all references used for the entire SOP into one section.
02	18 November 2022	Maria Patricia V. Azanza, Ph.D. Joanne R. Bantang, Ph.D. Cecile Leah T. Bayaga, Ph.D. Kristyn T. Caragay Marian Michelle D. Navales Mary Anne Ramos-Tumanan, Ph.D. Casiana Blanca J. Villarino, Ph.D. Fredelyn G. Tolete	Revised the SOP right header box to include a simplified SOP code and added date of approval
02	11 August 2023	Maria Patricia V. Azanza, Ph.D. Joanne R. Bantang, Ph.D. Cecile Leah T. Bayaga, Ph.D. Kristyn T. Caragay Ma. Leonora dL Francisco, Ph.D. Adelaida V. Mayo, Ph.D. Marian Michelle D. Navales Mary Anne Ramos-Tumanan, Ph.D. Casiana Blanca J. Villarino, Ph.D. Fredelyn G. Tolete	Added timeline (in working days) for each step in the Workflow Reformatted numbering of the sections to follow the SOP number (e.g., 3.1. Policy Statement) Changed from SOP 24 to SOP 25 after SOP on Review of Progress Report was added to the SOPs for post approval.
03	08 July 2024	See updated list of authors	Updated the list of authors to include all regular members following the change in membership of the UPCHE REC.