
Pharmacy Registration Board of Western Australia

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GUIDELINES FOR RECORD KEEPING

Context:

Section 46 of the *Pharmacy Act 2010 (WA)*

Cancellation and non-renewal of registration

(1) The Board must cancel or refuse to renew the registration of premises under this Division if —

- (a) the Board is not satisfied that the premises meet the requirements prescribed by the regulations for the minimum standards of fitness for the competent and safe practice of pharmacy;

Schedule 1 — Minimum standards of fitness for the competent and safe practice of pharmacy of the *Pharmacy Regulations 2010 (WA)* states -

Regulation 5 Records

The premises are to have a safe and secure location for the keeping of records made under regulation 16.

The manner by which this regulation is drafted, it is the *premises* and not the *Pharmacist having overall responsibility* that must “have a safe and secure location for the keeping of records made under regulation 16”.

Given the change of pharmacy practice (and commerce in general since 2010), the Pharmacy Registration Board of Western Australia (PRBWA) is aware that certain pharmacies hold their records in secure off-site premises and / or “in the cloud”.

Notwithstanding the possible breach of regulation 5, until the regulation can be updated to modern practice, the PRBWA will not take any active measures to review the breach where the pharmacy is using secure off-site premises or is storing its records “in the cloud” using best practices when storing digital information.

The PRBWA expects the following of a secure off-site premises:

- a secure, commercial storage company – preferably with experience with documentation relating to the healthcare industry;
- or
- a secured, alarmed off-site facility, that is only accessible by the pharmacist and the pharmacy staff.

The Pharmacist having overall responsibility must maintain information in respect of the secure destruction of records (actual and planned), and upon destruction, all traces of patient is removed from the record.

In respect of storing records electronically, the PRBWA expects the following:

Important Best Practices when Storing Digital Information:

- **Secure Storage**
 - **Physically** - secure your computer storing the data
 - **Update\Patch** - the computer operating system
 - **Antivirus Software** – install and update
 - **Firewall** - enable it
- **Cloud Computing**
 - use a reputable service provider and check guaranteed Service Level Agreements
- **Secure Access**
 - given only to staff that require it
- **Strong Passwords**
 - use a password manager and also change passwords regularly
- **Two-Factor Authentication**
 - to access the data, this makes sure that the data is secure even if your password is compromised
- **Backup**
 - **Regularly** - backup regularly to reduce data loss
 - **Off-Site** - to make sure that a loss of business site does not mean a loss of data
 - **Test Restores** - done regularly to ensure that the backups have worked
 - **Point in Time** - so you can restore data to how it looked at a certain period of time