

Standard Operating Procedure (SOP)

ESSENTIAL RESEARCH RECORDS

SETTING	Trust-wide
AUDIENCE	Research staff responsible for developing, using and maintaining essential research study records for research sponsored by UHBW.
ISSUE	To describe research study records to be maintained for UHBW sponsored studies to ensure compliance with applicable regulations.
QUERIES	Contact the Research & Development department on 0117 34 20233 or email research@uhbw.nhs.uk

Document History

SOP number	SOP 014	SOP Version	V2.5
Effective Date	28 APR 2026	Review Date	28 APR 2028

Version Number	Reason for change
Original V1.0	N/A
V1.1	Minor updates and clarifications. Inserted standard dissemination text at end of SOP.
V1.2	Minor updates and applied new SOP template
V2.0	Major updates to text about sponsor oversight, quality assurance and standards and minor updates elsewhere
V2.1	Minor updates and clarifications as part of biennial review
V2.2	Minor updates and clarifications as part of biennial review. Minor update to new Trust SOP template
V2.3	Departmental name change from Research & Innovation to Research & Development. Updated throughout SOP as a minor amendment.
V2.4	Clarification of what is meant by the TMF and the Sponsor Oversight File (previously referred to as sponsor TMF), other process clarifications, removal of text related to medical records at UHBW to be inserted into a separate SOP and other minor updates as part of biennial review.
V 2.5	Minor update to include updates to the Medicines for Human Use (Clinical Trial) Amendment Regulations (2025)

Review date	Version number	Version date	Effective date	Author/Reviewer	Authorised by
Original SOP	V1.0	19/OCT/15	03/NOV/15	Diana Benton	Diana Benton
NOV/2016	V1.1	25/NOV/16	20/DEC/16	Jess Bisset	Diana Benton
23/JAN2018	V1.2	23/JAN2018	22/FEB/2018	Katharine Wale	Jess Bisset
JUN/2018	V2.0	09/JUL/18	03/SEP/2018	Katharine Wale	Diana Benton
AUG/2020	V2.1	24/AUG/20	05/NOV/2020	Sandra Mulligan	Jess Bisset
OCT/2022	V2.2	12/DEC/2022	23/JAN/2023	Amelia Lowe Sandra Mulligan	Jess Bisset
FEB/2023	V2.3	15/FEB/2023	01/APR/2023	Lucy Riddolls	Elinor Griffiths
DEC/2024	V2.4	03/FEB/2025	04/MAR/2025	Jess Bisset	Elinor Griffiths
NOV/2025	V 2.5	22/APR/2026	28/APR/2026	Sandra Mulligan	Jess Bisset

1. Introduction

In accordance with the Medicines for Human Use (Clinical Trials) Regulations 2004, as amended by the Medicines for Human Use (Clinical Trials) (Amendment) Regulations 2025 and Good Clinical Practice (GCP), essential study records should be suitably maintained in order to manage the conduct of the research and to enable evaluation of the conduct of the trial, integrity of the trial data and compliance of the trial with GCP. Evaluation may be by audit, monitoring or inspection. The documentation should be stored such that the trial can be accurately reported, interpreted and verified, whilst protecting the confidentiality of the records of trial subjects.

2. Purpose

The purpose of this document is to describe essential trial documentation to be maintained in a Trial Master File. This SOP focuses on the requirements for a clinical trial of an investigational medicinal product (CTIMP), Clinical Investigation of a Medical Device (CIMD) and Advanced Therapy Investigational Medicinal Product (ATIMP). However, most elements will be applicable to all research conducted in the NHS, as part of GCP.

It is recognised that most external trials units will have their own processes for maintaining and archiving the TMF. If an external trials unit has a contract with UHBW which delegates the management of the TMF to the trials unit, UHBW will determine whether the trials unit's internal processes are compatible with the standards set out in this SOP. If acceptable, it may agree to the unit following its own processes and/or agreement will be sought on alternative processes to be followed, provided that the standards set out in this SOP are maintained. This will take place prior to the study opening to recruitment.

3. Scope

In Scope: Documentation for research sponsored by UHBW. Documentation for CTIMPs /CIMDs sponsored by other organisations where the minimum standards as described in this SOP are not met.

Out of scope: Documentation for research sponsored by organisations other than UHBW.

4. Responsibilities

- The sponsor is responsible for ensuring that a Trial Master File (TMF) is set up, maintained and archived. UHBW delegates sponsor responsibility to the CI (as specified in the Investigator Oversight SOP) for setting up and maintaining the TMF. For CTIMPs day-to-day management of the TMF is usually delegated to the trials unit managing the CTIMP/CIMD. This arrangement is documented in the Division of Responsibilities appended to the agreement between UHBW and the trials unit. For studies not managed by a trials unit (e.g. non-CTIMPs), the responsibility for the day-to-day management of the TMF can be delegated by the CI to a suitably trained member of the trial team.
- For CTIMPs/CIMD's responsibilities for specific tasks in setting up, maintaining and archiving the TMF are also identified in the sponsor's risk assessment, the Study Set up and Management Plan (SUMP) and in agreements with commercial suppliers.
- The Principal Investigator is responsible for ensuring that an Investigator Site File (ISF) is maintained at their site and archived at study completion. The PI retains ownership of the ISF.

5. Abbreviations and Definitions

Abbreviations	
ATIMP	Advanced Therapy Investigational Medicinal Product
CI	Chief Investigator
CIMD	Clinical Investigation of a Medical Device
CTIMP	Clinical Trial of an Investigational Medicinal Product
DMS	Document Management System
GCP	Good Clinical Practice
IMP	Investigational Medicinal Product
IRAS	Integrated Research Application System
ISF	Investigator Site File
PI	Principal Investigator
QA	Quality Assurance
SOP	Standard Operating Procedure
TMF	Trial Master File
UHBW	University Hospitals Bristol and Weston NHS Foundation Trust

Definitions	
Trial Master File	A TMF is the collection of documentation that allows the conduct of the clinical trial, the integrity of the trial data and the compliance of the trial with GCP to be evaluated. The Trial Master File may comprise of a sponsor oversight file and a master file held by the Chief Investigator or a trials unit (for CTIMPs /CIMDs). For the sake of clarity, this SOP distinguishes between 'TMF' (when referring to the entire TMF) and Sponsor Oversight File.
Investigator Site File	The ISF is the part of the TMF which is held at the site by the PI.
Sponsor Oversight File	The file held by the sponsor which provides all documentation relating to sponsor oversight

6.0 Procedure

6.1 Overview

6.1.1 Management arrangements

- The TMF should be established at the earliest stage possible during study set up.
- For UHBW sponsored CTIMPs, CIMDs, and some complex non-CTIMP studies, the overarching **management arrangements** of the TMF will be formally documented before the start of the study in a contract between the sponsor and the trials unit managing the study (where applicable). Further details on management arrangements, including locations of the TMF, use of paper or electronic format and arrangements for preparing the TMF for archiving will be agreed between the sponsor, the CI and the trials unit managing the study and documented in the Study Set Up and Management Plan (where applicable).

6.1.2 Sponsor oversight and monitoring of the TMF

- The findings of the sponsor's risk assessment of a research study will help determine whether a TMF review monitoring visit is required during the course of the study. If sponsor review is not required, the justification for this will be documented in the risk assessment (as applicable).
- Completion of *TMPL_016 Sponsor Close Out Checklist* and evidence of whether the trials unit has followed its own Quality Assurance (QA) processes for maintaining the TMF will help determine whether a sponsor TMF monitoring review and/or a sponsor study close out

monitoring review are required prior to archiving. TMPL_016 and the trials unit's QA processes for the TMF will also help to determine whether there are any records held by the sponsor which need to be transferred to the main TMF.

- Sponsor has regular oversight of essential records, signs off the IRAS application form and subsequent modifications. Any identified risks will be captured in the risk assessment (for CTIMPs/CIMDs) and within EDGE workflows for non-CTIMPs which will indicate any required monitoring activities.

6.1.3 Investigator Site File

- The records in the ISF are the TMF records held at site, which are under the responsibility and control of the PI.
- Any request for access to the ISF by the sponsor must be reasonable and may only be released with the PI or host site's permission.
- *TMPL_044 Investigator Site File Contents* lists the records that should be included in the ISF for CTIMPs/CIMDs and non-CTIMPs at each participating site. There will be duplicates of some records held in the ISF and the TMF. Where UHBW is a host site, the PI should use the sponsor's template (if required by the sponsor) or, if this is not mandatory or not available, should use UHBW's ISF template.
- The ISF should be filed in a location that is easily accessible to all members of the site research team and is held securely to maintain confidentiality of participants' records. The standards set out in section 7 specifically relate to the TMF but equally apply to the ISF.
- Source data held within the ISF such as consent forms, screening logs and patient drug accountability records must remain at site unless the participant has given explicit permission for the data to be made available to the sponsor or to other organisations.
- The TMF and the UHBW ISF should be held separately to reduce the risk of compromise to patient confidentiality. Where this is not feasible (e.g., UHBW sponsored non-CTIMPs managed by the clinical team) and has been agreed with the R&D Department, it may be permissible for the TMF and ISF to be maintained and held together.

6.1.4 E-TMF

- Records may be held on paper or electronically. The standards described in section 7 below apply equally to paper and electronic filing. It is acceptable to have an e-TMF, provided that it complies with the requirements for security and confidentiality, is readily accessible and mitigating action has been taken against the risk of obsolescence.
- The e-TMF must be validated to demonstrate it has the necessary functionality and that it is fit for purpose.
- There must be evidence of staff training in the use of the e-TMF.
- There must be a documented procedure in place for validating the transfer of records from paper TMF to e-TMF.
- Further information on electronic filing can be found in *GD_018 Essential Research Records*.

7. Standards

The TMF should comply with the following standards:

7.1 Completeness

- *TMPL_043 CTIMP Trial Master File Contents Index template* lists the **essential records** to be held in the TMF for UHBW sponsored CTIMPs. Depending on the type of CTIMP, some of the essential records listed in the template may not be required for a specific study (e.g., IMP shipping records where IMP is taken from hospital stock). N.B: The template also includes records such as confirmation of Capacity and Capability, greenlighting of sites, the trial database and database locking arrangements, that need to be retained as documentary

evidence of trial management and evaluation. The template is not an exhaustive list and any other records not listed in the template but necessary for trial management and evaluation should also be retained. *TMPL_043* is designed to be used for CTIMPs, but may be modified for use for non-CTIMP studies.

- The TMF should be '**inspection ready**' at all times. Records should therefore be regularly filed so that the TMF is always up-to-date.
- **Superseded versions** of records must be retained in the sponsor TMF and ISF to enable trial reconstruction. The ISF should include evidence of receipt and date of implementation. *TMPL_107* Version Control Log can be used to document this. The most recent and current version of records should be filed at the front of the relevant section of the TMF. Previous, superseded versions should be retained in the same section, crossed through and marked as superseded. For electronic records, a 'superseded' folder may be created for storing previous record versions.
- *TMPL_061 Modification log template for CTIMPs* should be completed to track modifications made throughout the study for UHBW sponsored CTIMPs. Alternatively, a trials unit may use its own modification log template, if agreed by UHBW as sponsor.
- Records which are relevant to more than one study and are held elsewhere in a **centralised system** must be retained for the full duration of the study archiving period. This includes staff training records and SOPs. The location of centralised records e.g. SOPs must be clearly stated in a file note within the relevant section of the TMF.
- There should be a complete record of individual **staff training and competencies** for the full duration of the study (i.e. evidence that the CI/PI and staff on the delegation log were appropriately trained and with the relevant experience at the time they were responsible for carrying out their duties). If training records, staff CVs and evidence of qualifications are held elsewhere, the location should be clearly stated in a file note within the relevant section of the TMF. If staff records are held centrally, steps should be taken to ensure that these are retained for the duration of the archiving period.

7.2 Accessibility

- Depending on the type of study and its level of complexity, it is acceptable for the TMF to be **dispersed** within and between departments and across organisations. For example, the trials unit may choose to keep separate folders for completed CRFs and for each participating site; the pharmacy department and other support departments at UHBW may hold a pharmacy TMF file and, if the study is managed through an external trials unit, it is likely that the main section of the TMF will be located within that organisation. The location of dispersed files should be clearly flagged in the main section of the TMF. *TMPL_043 Trial Master File Contents Index* template provides this facility.
- Consideration needs to be given to **ease of access** to the TMF. Staff who need access to the TMF should know where it is located and should be able to readily access the sections of the file which they need in order to carry out their delegated responsibilities.
- The requirement for accessibility equally applies to electronic filing. **Speed of access** to IT systems also needs to be considered, and the avoidance of any unnecessary delays to access in the event of an inspection.
- Further guidance on how to organise the TMF and facilitate ease of access, may be found in *GD_018 Essential Research Records*

7.3 Legibility

- All records should be clearly readable. Particular attention should be given to faint type, blurring at edges of records and unidentifiable signatories.

7.4 Security and Confidentiality

- The TMF should be held securely to protect it from loss or unauthorised access e.g. in a locked cabinet in a locked room within a swipe card protected area.

- There may be some parts of the TMF which should only be accessed by certain staff groups or access prohibited to certain individuals (e.g. for blinded studies). Consideration should therefore be given to, and arrangements put in place, for **controlled access** arrangements to the TMF. Consideration should also be given to who is permitted to add or to remove records from the TMF. The e-TMF should be protected from unauthorised changes and there should be documented processes for setting up user accounts, secure passwords for users and use of password protected files.
- The e-TMF should be regularly backed up and there should be a recovery plan in place for potential loss or destruction of data.

7.5 Traceability

- Any changes made to records should be traceable e.g. through use of version control and documented evidence of authorised changes to records. With regard to e-filing, this can be facilitated by use of audit trails so that it is clearly visible who has made changes and when the changes were made.

7.6 Quality assurance

- Evidence of quality control checks undertaken by the sponsor and the trials unit must be retained in the TMF or, if filed elsewhere, the location should be specified in the TMF. This includes annual EDGE study verification of UHBW sponsored CTIMPs, validation of records scanned into the e-TMF and TMF monitoring reviews. QA records produced by the sponsor which are to be filed in the TMF should be sent to the trials unit for filing contemporaneously.
- It is recommended that the study trials unit carries out a quality control check of the TMF at least annually. The sponsor may also conduct a TMF and, or, a site ISF monitoring review if the sponsor risk assessment and the sponsor monitoring plan identifies these as a need.
- Sponsor monitoring and oversight arrangements, as described at section 6.1.2, are part of the quality assurance arrangements of the r TMF.
- There should be periodic quality control checks of records scanned from paper to the e-TMF (as applicable); for further information on this topic, see *GD_018 Essential Research Records*

8.0 Preparing the TMF for archiving

- Refer to *SOP_015 Archiving of Research Records* on how to archive the TMF and the ISF.
- The TMF may comprise files which are dispersed across several departments and/or organisations (e.g. pharmacy files and records held by commercial suppliers). These should either be brought together as a single file or the location of dispersed files should be flagged in the main TMF.
- When the study is ready to be archived, both the sponsor and the organisation managing the TMF should check that it includes all necessary **evidence of sponsor oversight**. Sponsor oversight may include, but is not limited to, sponsor review and approval of records sponsor File Notes, monitoring conduct of the trial and maintenance of an SAE/breaches database. It is expected that most of this information would be contemporaneously filed in the TMF during study conduct, or that the location of records or held on centralised systems is flagged in the TMF as part of study set up.
- If the study is managed by an external trials unit, evidence of its **internal quality management controls** of the study should either be archived in the TMF or the location of this records clearly flagged in the TMF.

9.0 MHRA inspection

- The TMF should be readily available for inspection during the trial and for the duration of the specified archiving period.
- It may be necessary for the trial's unit managing the sponsor TMF to send documents to the sponsor to assist MHRA inspection. The trials unit should take steps to assure itself that the

records reviewed by the inspectors have not been changed during transfer. The MHRA therefore recommends that the trials unit should retain a copy of any material transferred to sponsor.

10.0 Dissemination and training in the SOP

Plan Elements	Plan Details
The Dissemination Lead is:	Research Operations Manager
Is this document: A – replacing the same titled, expired SOP, B – replacing an alternative SOP, C – a new SOP:	A – replacing the same titled, expired SOP
If answer above is B: Alternative documentation this SOP will replace (if applicable):	N/A
This document is to be disseminated to:	All applicable research staff (including R&D)
Method of dissemination:	<p>For major updates to the SOP dissemination will be:</p> <ol style="list-style-type: none"> 1. To Chief Investigators of UHBW Sponsored CTIMPs 2. Research unit leads across UHBW 3. Head of Research Governance at UoB (where SOP is applicable) <p>All updates (major and minor to the SOP) will be:</p> <ol style="list-style-type: none"> 1. Updated on the trust MyStaffApp 2. Updated on the R&D website 3. Cascaded in R&D communications
Is Training required:	All staff whose activities are subject to this SOP should ensure that they read and understand the content of the SOP. The personal training log of the individual (and the Investigator Site File/Trial Master File if required) should be completed to document that the content of this SOP has been read and understood as described in <i>SOP_007 Research Training UHBW</i>

REFERENCES

- GCP Inspectors Working Group of the European Medicines Agency - Reflection paper on GCP compliance in relation to trial master files (paper and/or electronic) for management, audit, and inspection of clinical trials
- ICH Good Clinical Practice (GCP) E6 (R3)
- The Medicines for Human Use (Clinical Trials) 2004
- [The Medicines for Human Use \(Clinical Trials\) \(Amendment\) Regulations 2025](#)
- MHRA - Good Clinical Practice (2012)

	<ul style="list-style-type: none"> • MHRA Position Statement and Guidance: Electronic health records – V1.0 16 Sept 2015 •
RELATED DOCUMENTS AND PAGES	<ul style="list-style-type: none"> • GD_018 Essential Research Records • SOP_007 Research Training UHBW • SOP_015 Archiving of Research Records • TMPL_016 Sponsor Close Out Checklist • TMPL_043 CTIMP Trial Master File Contents Index • TMPL_044 Investigator Site File Contents • TMPL_061 Modification log template for CTIMPs • TMPL_107 Version Control Log <p>These can be found on the R&D section of UHBW's website: http://www.uhbristol.nhs.uk/research-innovation/</p>
AUTHORISING BODY	Trust Research Group
SAFETY	N/A
QUERIES AND CONTACT	Contact the Research & Development department on 0117 34 20233 or email research@uhbw.nhs.uk
AUDIT REQUIREMENTS	Adherence to this SOP to be measured by outcome of any TMF/ISF monitoring of UHBW sponsored trials.