

Document and Paper Disposal Policy

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1 Introduction

1.1 Context

This policy is designed to ensure the retention, storage and disposal of paperwork in your pharmacy is managed in line with legal requirements and best practice guidance.

All pharmacy records should be complete, accurate and up-to-date and be organised in such a way as to allow for timely retrieval.

1.2 Purpose

The policy must be fully adhered to ensure:

- Paperwork that needs to be retained in the pharmacy is accurately catalogued and retained for the correct period of time (as required by legislation or best practice guidance).
- Paperwork that can be stored securely elsewhere is identified and organised correctly for easy retrieval (e.g. if an official from an external body requests to audit it).
- Paperwork for disposal is identified and managed correctly.

1.3 Scope

This policy relates to all paperwork in the pharmacy which may contain confidential, health or financial information (e.g. sales receipts, prescriptions).

This policy applies to all Allcare pharmacy staff.

1.4 Responsibilities

It is the ultimate responsibility of the supervising pharmacist to ensure that all staff are appropriately trained and this policy is implemented. Records of staff training must be maintained.

It is the responsibility of the supervising pharmacist to keep up to date on current guidelines to facilitate compliance with Regulation 12 of the Regulation of Retail Pharmacy Businesses Regulation 2008 (as amended) (S.I. 488 of 2008) PSI and all relevant Data Protection legislation, including the General Data Protection Regulation.

2 Procedure

2.1 Organising and Storing Paperwork

- Paperwork should be managed 'as you go' to ensure it is organised appropriately for easy retrieval.
- Dispensary bags should be used to separate and store the various types of paperwork associated with your pharmacy.
- Clearly label each bag with the exact paperwork it contains and the date to which it applies (see below)
- **Always include the date on which the paperwork can be sent for secure disposal**

- 1. Write Pharmacy name at the top of each bag/box**
- 2. Specify the type of paperwork enclosed**
- 3. Specify the month & year that the paperwork applies to**
- 4. Include the date from which the paperwork can be sent for secure disposal**
- 5. Seal the bag/box and store securely in the pharmacy/send for offsite storage as appropriate**

- At the end of each month seal up each bag and store securely within your pharmacy in an archive box for the required retention period (see section 3).
- Archive boxes/banker boxes must be used for paperwork storage in your pharmacy and for sending paperwork for off-site storage. These can be ordered from your stationary supplier.



- Different types of paperwork have different criteria for storage and retention. Please use the tables below to ensure that you are following the correct guidelines to manage your paperwork.
- It is important that data, including health data, is only retained for the period required. Paperwork that reaches its disposal date should be shredded or placed in a confidential waste bin. Shredding should not be allowed to accumulate.
- Allcare has a facility to store paperwork off site. Paperwork that can be stored off site (i.e. paperwork that cannot be destroyed but is not required to be kept on the pharmacy premises) must be arranged, labelled and boxed correctly before sending off for warehouse storage. *(You must follow the procedure outlined in Section 4 if you plan to send paperwork for off-site storage).*

3 Paperwork Storage Retention Requirements

Invoices						
Document Type	Storage Requirement	Required Storage Period in Pharmacy	Copy / Original must be sent to the Support Office with Monthly Paperwork	Must be sent to Support Office In the weekly mailing to Accounts Payable	Can be sent for offsite storage	Can be shredded once storage requirement in the pharmacy has expired
<i>Uniphar and United Drug Invoices</i>	Must be boxed monthly in line with instructions in Section 2.1 and kept in the pharmacy for 2 years	2 years* ¹ in pharmacy; total 6 years	No	N/A	Yes after 2 years	Only after 6 years
<i>Parallel Importers (e.g. PCO) and other wholesaler/ supplier invoices for medicinal products</i>	Must be boxed in line with instructions in 2.1 and kept in the pharmacy for 2 years	2 years in pharmacy; total 6 years	No	N/A	Yes after 2 years	Only after 6 years
<i>Controlled drugs to include Schedule 2 to Schedule 5</i>	Invoices and requisitions kept in pharmacy for 2 years. CD2 invoices should be kept separate to other invoices for easy retrieval	2 years in pharmacy; total 6 years	No	N/A	Yes after 2 years	Only after 6 years
<i>Veterinary Prescriptions, Registers and Invoices</i>	Must be kept in the pharmacy separate to other records	5 years in pharmacy; total 6 years	No	No	Yes after 5 years	Only after 6 years
<i>Exempt Medicinal Product / Unlicensed Medicine Invoices</i>	Must be kept in the pharmacy separate to other records	5 years in pharmacy (in hard copy or electronically)* ² total 6 years	No	No	Yes after 5 years	Only after 6 years

<i>Non Medicinal Product Invoices (e.g. direct suppliers) and other Proof of Deliveries</i>	Should be sent with your weekly paperwork mailing to Accounts Payable in the support office	Storage in Pharmacy not required	No	Yes	Yes, to be stored for 6 years	No
Prescriptions/ PSI / HSE Documents						
Document Type	Storage Requirement	Required Storage Period in Pharmacy	Copy / Original must be sent to the Support Office with Monthly Paperwork	Must be sent to Support Office In the weekly mailing to Accounts Payable	Can be boxed and collected by head office for storage	Can be shredded once storage requirement in the pharmacy has expired
<i>Exempt Medicinal Product / Unlicensed Medicine</i>	Must be retained in dedicated location/folder or scanned against entry on patient's PMR. Hard copies of prescriptions can be boxed in line with instructions in 2.3 and kept in the pharmacy. Keep separate to all other records.	5yrs hard copy or Electronically (scanned) * ²	N/A	N/A	No	Yes
<i>Veterinary Prescriptions & Register</i>	Must be retained in dedicated location/folder. Can be boxed in line with instructions in 2.3 and kept in the pharmacy. Keep separate to all other records.	5yrs	N/A	N/A	No	Yes
<i>All other prescriptions /prescription back-copies/ original CD's and copies of CD4 prescriptions /CD Register*⁶ / High-Tech prescriptions</i>	Must be retained in pharmacy. Can be boxed in line with instructions in 2.3 and kept in the pharmacy* ³	2yrs	N/A	N/A	No	Yes
<i>Emergency Medicine Administration records*⁵</i>	Must be retained in pharmacy. Can be boxed in line with instructions in 2.3 and kept in the pharmacy. Keep separate to all other records.	8 years	N/A	N/A	No	Yes

<i>Vaccination Records including Flu vaccine daily audit*⁶</i>	Must be retained in pharmacy. Can be boxed in line with instructions in 2.3 and kept in the pharmacy. Keep separate to all other records.	8 years	N/A	N/A	No	Yes
Document Type	Storage Requirement	Required Storage Period in Pharmacy	Copy / Original must be sent to the Support Office with Monthly Paperwork	Must be sent to Support Office In the weekly mailing to Accounts Payable	Can be boxed and collected by head office for storage	Can be shredded once storage requirement in the pharmacy has expired
<i>Printed Daily audits, *⁶ Pharmacist Duty Register*⁶ /Extemporaneous Record Sheets/ Patient & Care Home Delivery Logs/ Recalls/ Temperature Logs/ Health Service Records (excluding vaccination records)</i>	Must be boxed in line with instructions in 2.3 and kept in the pharmacy	2 years	N/A	N/A	No	Yes
<i>PCRS Itemised Claims Listing and Methadone Summary Listings</i>	Automatically being sent to support office. Any historic listings in pharmacy can be boxed up and sent for offsite storage.	No requirement to keep in pharmacy. Available in PDF format from PCRS website. Offsite storage required for 6 years for tax reasons.	No	No	Yes	Yes
<i>F45 (withholding tax certs)</i>	Should be sent with your weekly paperwork mailing to Accounts Payable in the support office	Not required	No	Yes	N/A	N/A

Cash Sheets / Monthly Paperwork

Document Type	Storage Requirement	Required Storage Period in Pharmacy	Copy / Original must be sent to the Support Office with Monthly Paperwork	Must be sent to Support Office In the weekly mailing to Accounts Payable	Can be boxed and collected by head office for storage	Can be shredded once storage requirement in the pharmacy has expired
<i>Cash in office sheet</i>	Send monthly to support Office	Not required	Yes, email is sufficient	N/A	N/A	N/A
<i>Till reads & Z reports, Petty Cahs Receipts</i>	Must be kept in the pharmacy for 12 weeks, thereafter can be sent to Greenogue for storage	12 wks in pharmacy 6yrs offsite (in Greenogue)	No	No	Yes	N/A

*1 Please consult individual wholesalers for the duration of online records: These invoices can be stored electronically in a secured file on your pharmacy computer.

*2 The record can be maintained as a daily printed computer record or in a separate register or folder. However you choose to keep the record, it must contain all the prescribed details and be available for inspectors to review at inspection. Please note that some of these details may not be automatically recorded on a computer-generated record. Pharmacists are reminded of their obligations to comply with the relevant obligations of what criteria MUST be recorded if capturing these records electronically. Reference European Communities (Animal Remedies) (No.2) Regulations 2007 (S.I. No. 786 of 2007) and [http://www.thepsi.ie/Libraries/Folder Pharmacy Practice Guidance/1 11 Guidelines on the Keeping of Records.sflb.ashx](http://www.thepsi.ie/Libraries/Folder_Pharmacy_Practice_Guidance/1_11_Guidelines_on_the_Keeping_of_Records.sflb.ashx)

*3 Scanned or Physical Copies of Schedule 4 Part 1 controlled drug repeatable prescriptions which are dispensed in part and any endorsements made can be stored electronically (i.e. scanned to the patient's PMR) or in paper form on the pharmacy premises for 2 years

*4) There is no requirement in pharmacy or medicines legislation to retain PCRS claim summary documents. Such documents are contractual and commercial in nature, and therefore outside the regulatory remit of PSI.

*5) All records relating to the supply and administration of a prescription-only medicine in an emergency must be kept for at least two years, from the date of administration, at the pharmacy premises concerned and be available for inspection. Furthermore, the records must be preserved by the pharmacy owner for at least eight years from the date of administration including if there is a transfer of pharmacy ownership.

*6) Must be stored on pharmacy premises for 2 years from date of last entry or date print out was signed by pharmacist on duty.

4 Offsite Storage Process



Where a pharmacy does not have adequate storage space, certain documents can be sent for storage to the designated off-site location (refer to guideline table above for items allowed to be stored off-site).

Paperwork is subject to audits and so MUST be organised as outlined above in Section 2. All contents must be clearly marked on the box using the template at the end of this policy, including the date from which the paperwork can be destroyed.

Any boxes sent off site which do not comply with this process will be returned immediately to the pharmacy.

4.1 Preparing Boxes for Off-site Storage

1. Ensure all paperwork is bagged and labelled as per guidance in Section 2
2. Put into Archive Box(es) and seal the lid (e.g. with brown tape)
3. Complete cover sheet(s) in full (one per box), put into a plastic poly pocket and attach securely to each box
4. Email mrowe@allcaresupport.ie requesting a collection, stating how many boxes need to be collected and detailing the contents
5. Collection will then be arranged from the pharmacy and the paperwork will be brought to the Uniphar Greenogue facility for storage.

Allcare Paperwork Storage Form

(This form must be attached to Archive boxes used for storage of pharmacy paperwork. If the box is being sent for off-site storage, please ensure the lid is sealed shut).

Pharmacy Name & Address:

Details of Paperwork Enclosed (including month/year)

- _____
- _____
- _____
- _____
- _____
- _____

Retain until (Month/Year):

____ / _____

(Once retention date has passed, shred / destroy with confidential paper waste)

I confirm that all enclosed paperwork has been correctly filed and labelled and will be stored as per Allcare policy **PM009 Document and Paper Disposal Policy**.

Pharmacist Signature: _____ Date: _____