

# Frequently Asked Questions: Patient Record Destruction

Correct storage and destruction of a patient's records is essential to maintaining patient confidentiality and to ensuring pharmacists maintain compliance with the *Personal Health Information Act* (PHIA). The following FAQ addresses some of the common issues College inspectors encounter regarding patient records.



## 1. How long are we required to keep patient records?

Records must be retained either electronically or in written form for at least 5 years.

## 2. I have a very small pharmacy. Am I required to store the records within my pharmacy?

The records do not have to be stored in the pharmacy if they are stored in a secure location *that is satisfactory to the Registrar of the College*. When transferring records to off-site storage, the pharmacy should direct correspondence to the College ([info@cphm.ca](mailto:info@cphm.ca)) and seek approval of the location of the off-site storage of records.

## 3. Am I required to keep documentation of transferring records to off-site storage?

The pharmacy must transfer the records securely and document the transfer on a permanent record. At the same time, the pharmacy must be able to produce any record within 72 hours of a request from the College.

## 4. Can I store pharmacy records in my home?

Pharmacy records cannot be stored at a residence. Pharmacy managers must ensure that the storage location has adequate security measures in place to protect the records from unauthorized access, theft, use or loss and they must obtain approval from the College for the storage site.

## 5. What are acceptable methods of record destruction?

Records can be destroyed using:

- A shredder
- A record destruction company such as Phoenix, Shred-It, or Iron Mountain.

## 6. What should I be aware of when delegating document destruction to a destruction company?

The pharmacy manager must ensure the destruction company is bonded and the service arrangement is compliant with PHIA.

**7.** What are my responsibilities under PHIA?

As trustees of personal health information, the pharmacist and pharmacy manager are responsible for the safety and security of patient records, even if the storage or destruction is contracted out to a third party. A third party that is retained by the pharmacy manager to dispose of records acts as an agent of the pharmacy. Therefore, the pharmacy manager must ensure their agent complies with PHIA.

**9.** Can I burn the records at my home in my fireplace or over a bonfire?

No because destroying records in this manner places the security and confidentiality of patient information at risk. The pharmacy manager is at risk of breaching PHIA in this situation, as there may be opportunity for others to view confidential patient information both in the transporting of the records and the possibility of incomplete incineration.

**8.** What information must be documented when destroying records?

When destroying records, you must document the following on a permanent record:

- Destruction date
- Prescription numbers

