Recommendations for the Retention of Pharmacy Records - prepared by the East of England NHS Senior Pharmacy Managers 2015



	Record	Unique record	Reason for keeping	Recommended minimum period	Derivation of recommendation and comments
RECORDS TH	AT PERTAIN TO ALL PHAF	RMACY	SETTINGS		
Clinical governance	Competency/training records	Yes	Reference	Duration of employment plus 2 yrs	Best practice, keep in personal portfolio.
	Clinical audit	Yes	Reference	5 yrs	Records Management – NHS code of Practice 2009.
	External quality control records	Yes	Audit	2 yrs	Records Management – NHS code of Practice 2009.
	Patient surveys	Yes	Audit	2 yrs	Records Management – NHS code of Practice 2009.
	Patient complaints	Yes	Audit	8 yrs	Records Management – NHS code of Practice 2009. Where a legal action has commenced, keep as advised by legal representative.
Clinical interventions	Minor clinical interventions	Yes	Audit	2 yrs	Best practice. Recommendation only applies for paper records. Two part form recommended, original to be added to the patient record, duplicate kept for 2 yrs. Entries made on an electronic database should be kept permanently.
	Significant clinical interventions	Yes	Audit	For 10 yrs after the death of the patient	Clinically significant interventions should be recorded directly in the patients notes/PMR. Electronic patient records must not be destroyed or deleted for the forseeable future.
Controlled drugs (CD)	CD register	Yes	Legal	2 yrs from date of last entry but if it contains records of destruction of CDs (including patient returns and out of date stock) then keep for 7 yrs	Misuse of Drugs Regulations 2001 A guide to good practice in the management of controlled drugs in primary care (England) v3.1, updated 1 Oct 2010. Safer management of controlled drugs: a guide to good practice in secondary care (England). Dept of Health, October 2007. Electronic CD register - see note 2. In Secure Environments Schedule 3 CDs are also recorded in CD registers (PSI IDTS 2010/45)
	Requisitions, orders, order books, delivery note or other record of receipt	No	Legal	2 yrs or 2 years from date of last entry for record books.	Misuse of Drugs Regulations 2001 states that all CD prescriptions should be kept for 2 yrs. Includes hospice requisitions, prison services & others not sent to NHSBSA. See note 3.
	Extemporaneous CD preparation worksheets	Yes	GMP	13 yrs	See note 3.
Equipment and	Cleaning logs	Yes	Reference	1 yr	Best practice.
premises	Validation of equipment & maintenance logs	Yes	GMP	For life of equipment	Best practice.
	Fridge temperature	Yes	GMP/GDP	1 yr or longer for sites holding a Wholes ale Dealers Licence	Refrigerator records to be kept for the life of any product stored therein – particularly vaccines. For sites subject to GDP inspection (licensed wholesale) records should be kept for 5 years as with other GDP records. SOPs detailing actions required in the event of fridge failure should also be available.

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Patient safety incidents	Dispensing error records/incidents & associated stats	Yes	Audit	1 yr plus current	Recommendations only apply to paper records, entries made on electronic databases should be kept permanently.
	Dispensing incidents – serious incidents resulting in disability or death	Yes	Legal	30 yrs	Records Management – NHS code of Practice 2009.
Recalls/drug alerts	Recall documentation	Yes	Audit	5 yrs	Recommendations from the Good Distribution Guide - especially for those with wholes ale dealers licence.
Responsible pharmacist	Responsible pharmacist records/log book	Yes	Legal	At least5 yrs	Can be in hard copy or electronic. Medicines (pharmacies/responsible pharmacist) Regulations 2008 (SI 2008/2789).
Superceded	Superceded SOPs	No	Reference	15 yrs	Best practice. As electronic record in perpetuity.
documents	Superceded Patient Group Directions (PGDs)	No	Reference	8 yrs for adult and 25 yrs for child (0-18 yrs) or for 8 yrs after a child's death	Best practice.
Stock handling	Picking tickets/delivery notes	Yes	Uncertain	3 months	A "reasonable" period of time - for verification of order only.
and transfer	Old order books	No	Audit	2 yrs	Current financial yr plus 1.
	Invoices	Yes	Legal	6 complete tax yrs	Limitation Act 1980. See note 4.
	Wholesale dealing records	Yes	GDP	5 yrs	EU Guide on Good Distribution Practice (part of the Orange Guide).
Waste medicines	Destruction of patients' own drugs (excluding controlled drugs)	Yes	Audit	6 months	Revised Duthie Report (2005) states that patient's own drugs are the property of the patient and should only be destroyed with the patient's permission. If medicines are removed from a patient's home during a domiciliary visit, record what is destroyed.
	Waste - Non-hazardous Transfer notes	Yes	Legal	2 yrs	Safe management of healthcare waste (version 2.0), Dept of Health & Environment Agency, 2012.
	Waste - hazardous Consignment notes	Yes	Legal	3 yrs	Safe management of healthcare waste (version 2.0), Dept of Health & Environment Agency, 2012.
HOSPITAL P	HARMACY SPECIFIC RECO	RDS (al	so applicable	e to Secure Environr	ments - see Note 8)
Clinical Trial	IMP batch production records	Yes	I GMP/GCP	5 yrs after end of the trial	Article 9 of Directive 2003/94/EC.
	Protocols	Yes	Reference	5 yrs after end of the trial	See note 1.
	Dispensing records	Yes	Reference	5 yrs after end of the trial	•
	Destruction records	Yes	GMP	5 yrs after end of the trial	The sponsor of the trial is responsible for the destruction of unused and/or returned trial material. Therefore any destruction must be authorized in writing and a dated destruction certificate supplied to the sponsor.
	Preparation or dispensing of ATMPs	Yes	Reference	30 yrs	ATMP = Advanced Therapeutic Medicinal Products.
	CD clinical trials information	Yes	GMP	5 yrs	This may be longer for some trials.
	Clinical drug trials or other studies outwith the Clinical Trials Directive	Yes	GCP / Against future claims	5 yrs after end of the trial	For example - metabolic studies, nutritional studies. Article 17 of Directive 2005/28/EC for Clinical trials, otherwise good practice.

	Record	Unique	Reason for	Recommended minimum	Derivation of recommendation and comments
		record	keeping	period	
Controlled Drugs	CD ward orders or requisitions	No	Legal	2 yrs	Misuse of Drugs Regulations 2001 states that all CD prescriptions should be kept for 2 yrs. Keep in original paper form or computerised form.
	Copy of signature for CD ward order or requisition	Yes	Validation	Duration of employment	Copy of signature of each authorized signatory should be available in the pharmacy department. Safer Management of Controlled Drugs – A guide to good practice in secondary care (England), Oct 2007.
	CD record book (ward/theatre based)	Yes	Audit	2 yrs from date of last entry but if it contains records of destruction of CDs (including patient returns and out of date stock) then keep for 7 yrs	Safer Management of Controlled Drugs – A guide to good practice in secondary care (England), Oct 2007. See note 2.
	Aseptic CD worksheets - adult paediatric	Yes Yes	GMP GMP	13 yrs 26 yrs	See note 3.
	CD clinical trials information	Yes	GMP	5 yrs	This may be longer for some trials.
	Destruction of patients' own CDs	Yes	Audit	7 yrs	Revised Duthie Report (2005) states that patient's own drugs are the property of the patient and should only be destroyed with the patient's permission.
	CD prescriptions (Both inpatient and outpatient)	Yes	Legal	2 yrs	Misuse of Drugs Regulations 2001 states that all CD prescriptions should be kept for 2 yrs. (Secure Environments see Note 9)
Medicines Information	Question asked, information search & answer	Yes	Reference and audit	8 yrs (25 yrs for child, obstetrics and mental health enquiries)	Recommendations applyto previous paper based enquiryforms. [UKMI National Standard for MI services, March 2009]. Electronic enquiry database (MIDatabank) should be kept permanently.
Miscellaneous	Doctors/nurses signatures	Yes	Reference	Duration of contract + 1	Destroy 1 yr after termination of employment (not referenced, best practice).
	Self administration records	No	Reference	Not required	Will be kept in nursing notes/main medical record.
	Superceded IV drug administration monographs	No	Reference	10 yrs	-
	MR documentation	Yes	Audit	2 yrs	As electronic record in perpetuity. See note 5.
	Drug & Therapeutics Committee agendas, letters, minutes, drug submissions, etc.	No	Reference	30 yrs	Dept of Health. Records Management: NHS Code of Practice, Part 2. Jan 2009.
Prescriptions	To take out (TTO) prescriptions	No	Audit	2 yrs	EPR will eventually hold all details - duplication of record held in notes, see note 5.
•	Out-patient prescriptions	No	Audit	2 yrs	EPR will eventually hold all details - duplication of record held in notes, see note 5.
	Private prescriptions	Yes	Audit	2 yrs	According to RPSGB ethics guide this is the minimum requirement. (Secure Environments see Note 8)
	Unlicensed medicines dispensing record	Yes	Legal	5 yrs	Requirement of Guidance Note 14. Permanent record of batch details kept.
	Parenteral nutrition (PN)	No	Audit	2 yrs	Original valid prescription should be kept in patient's notes.
	Chemotherapyprescriptions	No	Reference	2 yrs after last chemo treatment	EPR will eventually hold all details - duplication of record held in notes.

	Record	Unique	Reason for	Recommended minimum	Derivation of recommendation and comments
5		record	keeping	period	
Prescriptions cont.	Clinical drugs trials or other	Yes	GCP / Against	5 yrs after end of the trial	For example - metabolic studies, nutritional studies. Article 17 of Directive
	studies outwith the Clinical Trials		future claims		2005/28/EC for Clinical trials, otherwise good practice.
	Directive	Vaa	Deference	20.150	To allow full transphility of all blood products upo
	Immunoglobulins/blood products	Yes	Reference	30 yrs	To allow full traceability of all blood products use.
Purchase	Order & delivery notes	No	Audit/GDP	2 yrs or 5yrs	Current financial yr plus 1. See note 4. For Wholesaler Dealers EU Guide on Good
Orders	•				Distribution Practice requires retention of all records for 5yrs.
	Ward stock order sheets	Yes	Audit	2 yrs	Current financial yr plus 1.
	Ward pharmacy requests	No	Uncertain	1 yr	Record of what was requested by ward pharmacist - unlikely benefit after 12 mths
	Ad hoc forms (e.g. dispensing request forms to stores)	No	Uncertain	3 months	Reasonable period and current practice.
Stock Control	Stock check lists	Yes	Audit	1 yr plus current	As in HSC 1999/053.
Tankais -!	Any Ovality Control (CC)	l Var	LOMB		Mhishauguis the legger (Artisle 54/0) of Directive 0004/00)
Technical	Any Quality Control (QC)	Yes	GMP	5 yrs or 1 yr after expiry	Whichever is the longer, (Article 51(3) of Directive 2001/83).
services	documentation including			date of batch	
	certificates of analysis Environmental monitoring results	Yes	GMP	1 yr after expiry dates of	As electronic record in perpetuity.
	Environmentarmonitoring results	162	GIVIF	products	As electronic record in perpetuity.
	Validation/training of operators	Yes	GMP	Duration of employment	Keep in personal portfolios.
				+ 5 yrs after leaving	
	Paediatric products worksheets	Yes	GMP	At least5 yrs	Product liability extends to up to 28 yrs. See note 6.
	Chemotherapy/aseptic worksheets	Yes	GMP	5 yrs	Product liability extends this to 11 yrs after expiry.
	PN worksheets	No	GMP	5 yrs	Product liability extends this to 11 yrs after expiry.
	Resuscitation boxworksheet	Yes	GMP	1 yr after expiry of longest dated item	If sold or supplied across a legal boundary 5 yrs or 1 yr after expiry date of batch as per GMP.
	Batch production records	Yes	GMP	5 yrs	Product liability extends this to 11 yrs after expiry.
	Extemporaneous dispensing	Yes	Product	5 yrs	Product liability extends this to 11 yrs after expiry.
	records Raw material request; packaging	Vaa	liability GMP	At least5 yrs	Part of batch record, so product liability issues apply (extends to 11 yrs after
	and control forms	Yes	GIVIP	At least5 yis	expiry).
Unlicensed	Any unlicensed medicines (ULM)	Yes	Legal/Against	5 yrs	Not a specific requirement of Guidance note 14, it would be best practice to keep a
medicines	documentation		future claims		permanent batch specific record of the assessment of the ULM purchased.
COMMUNI	TY PHARMACY SPECIFIC RE	CORDS	S		
Dispensing	PMR	Yes	Legal	For 10 yrs after the death of the patient	Records Management – NHS code of Practice 2009. Electronic patient records must not be destroyed or deleted for the forseeable future.
	Private prescriptions	Yes	Legal	2 yrs	The Human Medicines Regulations 2012 (regulation 253 (5))
	POM register	No	Legal	2 yrs from last entry	The Human Medicines Regulations 2012 (regulation 253 (5))
	POM-V & POM-VPS records of	Yes	Legal	At least 5 yrs	Veterinary medicines regulations 2009 (SI 2297) Must keep all documents relating
	receipt and supply			1	to the transaction. Specific requirements for what information must be included.

	Record	Unique record	Reason for keeping	Recommended minimum period	Derivation of recommendation and comments
EPS2	Patient pharmacy nomination	Yes	Audit	6 mths after the last prescription the collected	Best practice. This also applies to patient authorisations for managed repeat systems.
Specials and unlicensed medicines	Extemporaneously prepared on the premises with internal quality control.	Yes	Legal	5 yrs	The Human Medicines Regulations 2012 (regulation 170). Product liability extends this to 11 yrs after expiry for adults and up to 28 yrs for children. See note 4.
	Extemporaneously prepared by another pharmacy/company with external quality control	No	Legal	5 yrs	The Human Medicines Regulations 2012 (regulation 170). Should have the certificate of conformity including the source of the product; to whom, and the date on which the product was sold or supplied; the prescriber's
	Unlicensed imports	No	Legal	5 yrs	details; the quantity of each sale or supply; the batch number of the product; details of any adverse reactions to the product sold or supplied. See note 4.
DDA / Equality Act	Record of assessment and outcome of patients needs in respect of medicines	Yes	Reference	Minimum 1 yr	Best practice Assessment should be repeated if patient circumstances change.
Public Health Campaigns	Evidence of participation in local public health campaigns	Yes	Reference	2 yrs	Where requested by the commissioner to do so, records should be kept to evidence compliance with Terms of service of Pharmacists – Schedule 4, part 2, para 18 (b) to regulation 11(1)(a)(i) of the National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013.
Advanced services	MUR records	Yes	Legal	2 yrs	Records can be kept in electronically or in hard copy. The Pharmaceutical Services (Advanced and Enhanced Services) (England) Directions 2013 require pharmacies to keep copies of the MUR consultation record for at least two years after the date on which the consultation to which the record relates is carried out (Direction 5(1)(I)).
	New medicine service forms	Yes	Legal	2 yrs	Records can be kept in electronically or in hard copy. The Pharmaceutical Services (Advanced and Enhanced Services) (England) Directions 2013 require pharmacies to keep copies of the NMS consultation records for at least two years after the date on which the service intervention is completed or discontinued (Direction 7(1)(n)).
	Stoma appliance customisation	Yes	Legal	12 months	Records can be kept in electronically or in hard copy. The Pharmaceutical Services (Advanced and Enhanced Services) (England) Directions 2013 require pharmacies to keep records of each stoma customisation for at least 12 months or such longer period as the commissioner may reasonably require (Direction 10(2)(d)).
	Appliance use review	Yes	Legal	12 months	Records can be kept in electronically or in hard copy. The Pharmaceutical Services (Advanced and Enhanced Services) (England) Directions 2013 require pharmacies to keep records of each AUR for at least 12 months or such longer period as the commissioner may reasonably require (Direction 12(5)(e)).

	Record	Unique	Reason for	Recommended minimum	Comments
		record	keeping	period	
Enhanced services, locally commissioned services or	Sexual Health service forms	Yes	Audit	For adults aged 18 and over: 10 yrs For a child: until the 25 th birthday or 10 yrs (whichever is longer)	Records Management – NHS code of Practice 2009 Clinical Standards Committee, Faculty of Sexual and Reproductive Healthcare (FSRH) of the Royal College of Obstetricians and Gynaecologists. NB The longest license period for a contraceptive device is 10 years.
private services See Note 7		No	Reference	Where individual patient records are kept by a sexual health team and a shorter minimum period for retaining records may be stated in the service level agreement.	The following police for a solling sophic do list to yours.
	Smoking cessation service	Yes	Audit	2 yrs	Records Management – NHS code of Practice 2009.
	Supply of Smoking cessation therapy (not via FP10) e.g. NRT	Yes	Audit	2 yrs	Records Management – NHS code of Practice 2009.
	Supply of Smoking cessation therapy via PGD	Yes	Audit	2 yrs	Records Management – NHS code of Practice 2009.
	Minor ailments service	Yes	Audit	2 yrs	Recommended best practice.
	Immunisation and vaccination records	Yes	Audit	Retain until the patient's 25th birthday or 26th if the young person was 17yrs old at conclusion of treatment. All others retain for 10 yrs after conclusion of treatment.	Records Management – NHS code of Practice 2009
	NHS health check	No*	Audit	2 yrs	Best practice *If the results are forwarded to the patients GP for inclusion on the clinical record
	NHS health check	Yes**	Audit	2 yrs	Best practice **Where results are not forwarded to the GP
	Substance misuse service forms	Yes	Audit	2 yrs	Recommended best practice
Invoices and consent forms	All payment claims, invoices and patient consent forms relating to any advanced or enhanced service	Yes	Audit	6 complete tax years	VAT regulations 2005 for invoices. Individual signed consent forms support the invoiced claim. NOTE: Enhanced service consent forms represent consent at the point in time the service is provided and are not proof of ongoing consent.
Other records	Any other records pertaining to individual patient care in community pharmacy, not covered elsewhere in this document.	Yes	Audit	2yrs	Best practice. This recommendation only applies for paper records, it is accepted that, where appropriate, records relating to patient care e.g. self care, signposting, telephone queries should be entered on the PMR, either directly or transferred from paper records. Entries made on the PMR should be kept permanently.

Where GMP	manufacturing practice; GDP = good distribution practice; GCP = good clinical practice; MR = medicines reconciliation; MUR = medicines use review is given as the reason for keeping the record, this would be legally enforceable for all unlicensed medicines and for any manufacturing of medicines under an MHRA reason for keeping other than 'legal' can be regarded as best practice.
Note 1	The sponsor of the trial is responsible under current legislation for keeping trial records. All clinical trial records should be retained for a longer (up to 15 years) if required by the applicable regulatory requirement(s) or if needed by the Sponsor as per Annex 1 to Directive 2001/83/EC and GCP requirements CPMP/ICH/135/95.
Note 2	Once electronic CD registers are in widespread use, the Government intends to require anyone required to keep secure copies of a CD register for up to 11 years. (Department of Health. Safer management of CDs: Changes to the record keeping requirements, guidance for England only. Last revised Febru ary 2008)
Note 3	Every requisition, order or private prescription on which a CD is supplied must be preserved by the pharmacy department for a minimum of 2 years from the date on which the last delivery under it was made. Although the mandatory period for keeping requisitions is 2 years, health care organizations may wish to store them for longer periods, as cases often come to court at a much later date. Future regulations may increase the period of time for the storage of records. (Department of Health/RPSGB, Safer management of controlled drugs – a guide to good practice in secondary care. (England) Oct 2007)
Note 4	Either delivery notes or invoices should be kept for 11 years as product liability records.
Note 5	EPR must not be destroyed or deleted for the foreseeable future. (Department of Health. Records Management: NHS Code of Practice, Part 2. Jan 2009)
Note 6	Consumer Protection Act 1987 allows patients to claim up to 10 years after a medicine has been administered (in paediatrics up to 28 years - maturity plus 10 years). If adequate records are available in the patient's notes, the records should only need to be kept for the period stated under the recommendation.
Note 7	For locally negotiated services, if the minimum retention period stated in the contractual arrangement of the service level a greement (SLA) exceeds the recommendations of this document contractors must adhere to the SLA.
Note 8	NHS England directly commissions healthcare in all residential Secure Environments (prisons, Immigration Removal Centres and Secure Training Centres). Prescriptions generated in these settings are therefore NHS prescriptions and not private prescriptions. The expectations for prescriptions and other record retention for these settings are in the main as for hospital settings. A wing or treatment room is considered equivalent to a hospital ward. (NPC 2009 A Guide to Good Practice in the Management of Controlled Drugs in Primary Care). The community pharmacy section of this document is relevant where Advanced services or additional enhanced services are commissioned.
Note 9	In addition to retaining the CD prescription a copy of the current CD prescription (i.e. Schedule 2 and 3) for a patient should be available on patient transfer to another secure setting. To achieve this either a scanned e-copy or a hard copy transferred with the patient is needed. This is essential for enabling continuity of supply on transfer until the prescription is reviewed. (PSI IDTS 2010/45) and Best Practice.

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