
RETENTION AND STORAGE OF RECORDS

Approved by: Administration	Effective Date: June 2, 2017	CPR-50
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POLICY

To ensure that the Lennox and Addington County General Hospital records are retained and stored in a reasonably secure manner and in accordance with legal requirements.

APPLICATION:

1. All records created, captured and managed within Lennox and Addington County General Hospital must be maintained in accordance with the applicable period set out in the Lennox and Addington County General Hospital Records Retention & Disposal Schedule set out in Appendix 1.
2. Retention periods are based on applicable legal statutes, professional regulations, generally accepted industry practices and established Lennox and Addington County General Hospital policies.
3. In the absence of any of the above, records are kept for as long as required by the purpose for which the information in the record was collected.
4. Records shall not be kept for any longer than set out in the Retention & Disposal Schedule or as consented to by the patient unless for the purposes of managing legal risks with the approval of the CEO or if the Hospital receives notice of a court action, investigation, assessment, inspection, inquest, access request or other inquiry prior to the record's destruction. All non-clinical records of an administrative nature that have not been addressed in the Schedule should be retained for a period of no more than two years.
5. Multiple copies of a single record should not be kept as such a practice increases the chances of unauthorized use and disclosure of confidential information, places an undue financial burden on the Hospital and results in an inefficient use of space.
6. During the retention period, records must be stored securely by providing adequate physical security, technological security and administrative controls to protect against unauthorized use and disclosure and the record being lost or stolen.
7. Physical controls may include but are not limited to locked filing cabinets, restricted office access and a manned reception area to control physical access to a records storage area.
8. Technological security may include but is not limited to intruder detection systems, password protecting documents and encryption. For more information, please refer to the Security of Personal Health Information Policy #PR5-40.
9. Administrative controls may include but are not limited to prohibiting anyone without an LACGH badge from the records storage area, appointment of a staff member with responsibility for your area's security, training on your security measures, confidentiality agreements for outside vendors and auditing of access to electronic records.

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10. The adequacy of any particular security measure is based on the sensitivity of the information and the risks to which it is exposed.
11. Any storage facilities used for long-term storage of records should have adequate security and climate-control standards. If the facilities of an outside agency are used, these requirements should be specified in the contract. Staff may access the Corporate Privacy Officer to ensure these requirements are appropriately addressed in any storage agreement.
12. All Lennox and Addington County General Hospital records stored electronically shall be subject to an automatic back-up for file recovery purposes to protect records from loss or damage.
13. All Lennox and Addington County General Hospital records shall be disposed of in accordance with the Disposal – Personal Health Information Policy #PR5-60. In respect of all disposed of Hospital Health Records, the names of the patients to whom the records relate and the date and manner of destruction shall be recorded.

DEFINITIONS:

A “record” is any information received and/or created in the course of Hospital operations, in any form or media, including written, printed, photographic or electronic form, but excluding computer programs and other mechanisms that produce a record.

An “official custodian” has been assigned to each type of record in this policy. This identifies the department, unit or individual that has responsibility for the storage and maintenance of documents and other materials in accordance with this policy.

NOTE: DO NOT DISPOSE OF CONFIDENTIAL MATERIAL IN THE BLUE ‘RECYCLING’ WASTE BASKETS.

REFERENCES:

Mount Sinai Hospital – Retention and Storage of Records Policy

OHA: Records Retention Toolkit. Guide to the Maintenance and Disposal of Hospital Records (Revised 2013)

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CORPORATE RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Articles of Incorporation	Corporations Act	Statutory - Permanent	Electronic and Hard Copy	N/A	No	Office of the CEO
Letters Patent	Corporations Act	Statutory - Permanent	Electronic and Hard Copy	N/A	No	Office of the CEO
Register of Directors	Corporations Act	Statutory - Permanent	Electronic	N/A	Yes	Office of the CEO
Register of Members	Corporations Act	Statutory - 10 Years	Electronic	N/A	Yes	Office of the CEO
Bylaws/Policies	Corporations Act	Statutory – Permanent	Electronic and Hard Copy	N/A	No	Office of the CEO
Annual Report / Annual Meetings Minutes	Corporations Act	Statutory - Permanent	Electronic and Hard Copy	N/A	No	Office of the CEO
Contracts / Legal Agreements	Limitations Act	Statutory - Permanent	Electronic and Hard Copy	N/A	No	Office of the CEO/ Finance/ Purchasing
Minutes of the Executive Committees: Board of Directors and Subcommittees, Medical Advisory Committee	Corporations Act	Statutory - Permanent	Electronic and Hard Copy	N/A	No	Office of the CEO
Insurance Policies	Limitations Act	Statutory – 15 Years	Hard Copy	Shred	No	Office of the CEO
Litigation Files		Recommended - 7 years	Hard Copy	Shred	Yes	Director of Quality
Credentials/ Medical Staff Files	Limitations Act	Statutory - Permanent	Electronic/ Hard Copy	N/A	Yes	Office of the CEO
Procurement Documentation	Broader Public Sector Procurement Directive	Statutory – 7 Years	Electronic Copy	Delete	No	Director of Quality
Fire Safety Tests & Inspections	Fire Code under the Fire Protection and Safety Act	Statutory - 2 Years	Electronic/ Hard Copy	Delete	No	Maintenance Supervisor
Elevator Log Book	Elevating Devices Regulation under the Technical	Statutory - 5 Years	Electronic/ Hard Copy	Delete	No	Maintenance Supervisor

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	Standards Act					
Engineering Drawings & Blueprints	n/a	15 Years (recommended)	Electronic/ Hard Copy	Delete	No	Maintenance Supervisor
Accreditation Materials (Preparation, reports, survey)	n/a	Accreditation Cycle Year +10 Years	Electronic/ Hard Copy	Delete/ Shred	Yes	Director of Quality
Patient Satisfaction Surveys	n/a	Recommend 5 years	Electronic	Delete	Yes	Director of Quality
Patient Incidents & Critical Incident Reviews		Stored since inception of RM Pro 2011-present	Electronic	N/A	Yes	RM Pro

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FINANCIAL RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Audited Financial Statements	Income Tax Act	Statutory - Permanent	Hard Copy	N/A	No	Finance
Annual Returns	Corporations Act	Statutory - Permanent	Hard Copy	N/A	No	Finance
General Journal	Corporations Act	Statutory – Permanent	Hard Copy	N/A	No	Finance
General Leger	Corporations Act	Statutory - Permanent	Hard Copy	N/A	No	Finance
Source Documents (records integral to creation of financial statements/ tax returns)	Income Tax Act	Recommended – 6 Years from the end of tax year to which they relate)	Hard Copy	Shred	No	Finance
Banking: bank reconciliation, bank deposit slips/ books, cancelled cheques, cheque registrar	Income Tax Act	Statutory – 7 Years	Hard Copy	Shred	Yes	Finance
Accounts Payable Distribution & Receipts	Income Tax Act	Statutory – 7 Years	Hard Copy	Shred	Yes	Finance
Grant Accounts	Income Tax Act	Statutory – 7 Years	Electronic and Hard Copy	?	?	Finance
Payroll: T4/T4A reports, time sheets, deduction register	Income Tax Act	Statutory – 7 Years	Electronic and Hard Copy	Delete Electronic/ Shred	Yes	Payroll
Patient Accounts: patient leger card, cash receipts, customer invoices, other billing invoices	Income Tax Act	Statutory – 7 Years	Electronic and Hard Copy	Delete Electronic/ Shred	Yes	Finance
Safekeeping Envelopes (patient)		7 years			Possibly	Inpatient ward clerk
Hospital Budget	Income Tax Act	Statutory – 7 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	No	Finance

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Capital Equipment: purchase orders & original documents	Income Tax Act	Life of Equipment	Electronic/ Hard Copy	Delete Electronic/ Shred	No	Finance
Purchasing: non-stock purchase requisitions, return goods requisition, repair & maintenance requisitions	Income Tax Act	Statutory – 7 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	No	Finance
Annual Inventory Reports	Corporations Act	Statutory – 3 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	No	Finance

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PERSONNEL RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Employment Record (attendance, correspondence, employee documents, CV, performance appraisals, vacation record)	Corporations Act/ Employment Standards Act	Statutory – 7 Years after last day worked	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Human Resources
Canada Pension Plan Contributions	Canada Pension Plan	Statutory – 6 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Payroll
Employees' Earnings Record Cards, EI Records	Employment Insurance Act	Statutory – 6 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Payroll
HOOPP Individual Contributions Record	Income Tax Act	Statutory – 7 Years	Electronic	Delete Electronic	Yes	Payroll
Income Tax/T4 Forms	Income Tax Act	Statutory – 7 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Payroll
Payroll Deduction Authorization Forms, union dues deduction sheets	Income Tax Act	Statutory – 7 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Payroll
EHT Records/ Billing Forms	Income Tax Act	Statutory – 7 Years	Hard Copy	Shred	Yes	Payroll
WSIB Invoices	Income Tax Act	Statutory – 7 Years	Hard Copy	Shred	Yes	Payroll
Payroll Journal Sheets, Time Cards/ Sheets	Income Tax Act	Statutory – 7 Years	Hard Copy	Shred	Yes	Payroll

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HEALTH RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Patient Register	Limitations Act	Statutory – 50 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Health Records
Patient Records	Public Hospitals Act	Statutory – 10 Years from last visit (or 10 years past patients' 18 th birthday) whichever is longest	Electronic/ Paper/ Microfiche	Delete Electronic/ Shred	Yes	Health Records
Diagnostic Images (excluding Mammograms)	Public Hospitals Act	Statutory – Adult (18+) at least 5 Years after image created. Children: at least 5 Years after patients' 18 th birthday	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Medical Imaging
Diagnostic Images (Mammograms)	Public Hospitals Act	Statutory – Adult (18+) at least 10 Years after image created. Children: at least 10 Years after patients' 18 th birthday	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Medical Imaging
Diagnostic Images (Echocardiograms)	Public Hospitals Act	10 Years (of note: we do not delete anything in PACS, therefore exceed standards.)	Electronic/ Hard Copy	N/A	Yes	Medical Imaging

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OCCUPATIONAL HEALTH & SAFETY RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Designated Substance Exposure Records	Limitations Act / Ministry of Labour	Statutory – 40 Years	Hard Copy	Shred	Yes	Occupational Health
Employers' Report of Injury/ Disease (Form 7)	WSIB	Statutory – Lifetime of Injured	Hard Copy	Shred	Yes	Occupational Health
Occupational Health & Safety Records	Limitations Act	Statutory – 10 Years	Hard Copy	Shred	Yes	Occupational Health
Material Safety Data Sheets	Limitations Act	Statutory – Date of Expiry +2 Years	Hard Copy	Recycle	No	Occupational Health
Minutes: Joint Occupational Health & Safety Committee	Limitations Act	Statutory – 7 Years	Electronic	Delete	No	Occupational Health
Inspection Reports from Ministry of Labour	Occupational Health & Safety Act	Statutory – 1 year or longer to ensure that 2 of the most recent reports are available – Recommend 10 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Director of Quality
JOHSC Workplace Inspection Reports	Occupational Health & Safety Act	Statutory – keep the most recent copy	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	JOHSC Admin Assistant
Accident/ Injury Incident Reports	Occupational Health & Safety Act	Statutory – 1 Year Recommended – 3 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Occupational Health

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EMPLOYEE HEALTH RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Medical Records - Employees	Occupational Health & Safety Act	Statutory – 10 years after employee terminates and lifetime retention if a work-related illness/ injury	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Occupational Health

WASTE MANAGEMENT RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
Annual Waste Audits Reduction Work Plans Source Separations Detection	Ministry of the Environment and Energy	Statutory – 2 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Operations & Maintenance Supervisor
Manifests	Ministry of the Environment and Energy	Statutory – 2 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Finance
Notices	Environment Canada – EIHW Reg. 45 (3)	Statutory – 3 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Operations & Maintenance Supervisor
Inspection Reports		Recommend 5 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Operations & Maintenance Supervisor

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PHARMACY RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
All Patient Medication Related Records (to ensure auditable/traceable to patient)	Ontario College of Pharmacists	10 Years	Electronic	Delete Electronic	Yes	Pharmacy
Equipment Certification & Maintenance	Ontario College of Pharmacists	10 Years	Hard Copy	Shred	No	Pharmacy
Dispensing Records: (i) Inpatient (pass meds) (ii) Floor stock (iii) Controlled drugs & targeted substance records (iv) Pre-packaging & compounding records (v) Inventory management records (vi) Pharmacy communication (vii) Chemotherapy preparation & dispensing worksheets	Ontario College of Pharmacists	10 Years	Hard Copy Electronic Electronic Hard Copy Electronic/ Hard Copy Electronic Hard Copy	Shred Delete Electronic Delete Electronic Shred Delete Electronic/ Shred Delete Electronic Shred	Yes No Yes No No Yes Yes	Pharmacy
Clinical Activities & Documentation	Ontario College of Pharmacists	10 Years	Electronic	Shred	No	Pharmacy
Quality Assurance Documentation (audits, inspections)	Ontario College of Pharmacists	10 Years	Electronic	Shred	No	Pharmacy

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LABORATORY RECORDS						
Record Category	Jurisdiction	Retention Period (Required)	Storage Media	Disposal	Contains Personal Information	Official Custodian
General Chemistry						
Accession Log Records	Institute for Quality Management	2 Years	Electronic	Delete Electronic	Yes	Laboratory
Maintenance/ Instrumentation Maintenance	Institute for Quality Management	Life of Analyzer +2 Years	Hard Copy	Recycle	No	Laboratory
Quality Control Records	Institute for Quality Management	Current year +2 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Laboratory
Hematology						
Abnormal Slides - Adult	Institute for Quality Management	10 Years	Hard Copy	Shred	Yes	Laboratory
Abnormal Slides - Child	Institute for Quality Management	10 Years past 18 th birthday	Hard Copy	Shred	Yes	Laboratory
Normal Slides	Institute for Quality Management	1 Week	Hard Copy	Shred	Yes	Laboratory
Clinical Pathology						
Patient Test Records	Institute for Quality Management	Indefinitely	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Laboratory
Blood Bank						
Donor & Recipient Records	Institute for Quality Management	Indefinitely	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Laboratory
Method Revisions	Institute for Quality Management	Indefinitely	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Laboratory
Records of employees signatures, initials ID codes, qualifications and training	Institute for Quality Management	10 Years after last day worked	Hard Copy	Shred	Yes	Laboratory
Quality Control Records	Institute for Quality Management	Current +5 Years	Electronic/ Hard Copy	Delete Electronic/	No	Laboratory

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				Recycle		
Records of Permanently Deferred Donors	Institute for Quality Management	Indefinitely	Hard Copy	Shred	Yes	Laboratory
Specimens from Donor Units & Recipients	Institute for Quality Management	7 Days Post-Transfusion	Hard Copy	Shred	Yes	Laboratory
Lookback/ Traceback	Institute for Quality Management	Indefinitely	Hard Copy	Recycle	No	Laboratory
Temperature Monitoring Records for Blood Products	Institute for Quality Management	Current +5 Years	Hard Copy	Shred	No	Laboratory
EQA/ Audits/ Complaints Results	Institute for Quality Management	Current +5 Years	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Laboratory
Issue Vouchers from Suppliers	Institute for Quality Management	Indefinitely	Hard Copy	Recycle	No	Laboratory
Transfusion History Record	Institute for Quality Management	Indefinitely	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Laboratory
Transfusion Reaction Record	Institute for Quality Management	Indefinitely	Electronic/ Hard Copy	Delete Electronic/ Shred	Yes	Laboratory
Information Related to Special Access Products	Institute for Quality Management	Indefinitely	Hard Copy	Recycle	No	Laboratory
Test Requisitions (downtime)		Indefinitely	Hard Copy	Shred	Yes	Laboratory
Laboratory - All						
Patient Test Reports - Clinical	Institute for Quality Management	Indefinitely	Electronic	Delete Electronic	Yes	Laboratory
Patient Test Reports – Clinical & Pathology	College of Physicians and Surgeons of Ontario	Health Record Retention Period	Hard Copy	Shred	Yes	Laboratory
Proficiency Test Records		7 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Laboratory
Calibration Records	Institute for Quality Management	Current +2 Years	Hard Copy	Recycle	No	Laboratory

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Instrument/ Equipment Preventative Maintenance Service Repair	Institute for Quality Management	Life of Instrument +2 Years	Hard Copy	Recycle	No	Laboratory
Records of Temperature Controlled Spaces, Heating and Cooling	Institute for Quality Management	In lab, 2 Years Other, Maintenance Dept.	Hard Copy	Recycle	No	Laboratory
Computer Quality Assurance Records		3 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Laboratory
Quality Control Records (Reports of Internal Audits & Records of Product Complaints)	Institute for Quality Management	Current +2 Years	Hard Copy	Recycle	No	Laboratory
Quality Assurance Records		7 Years	Electronic/ Hard Copy	Delete Electronic/ Recycle	No	Laboratory
Methodology Change – Normal Range Changes, Reporting Unit Changes	Institute for Quality Management	Indefinitely	Electronic	Delete Electronic	No	Laboratory
Minutes		Indefinitely	Electronic/Hard Copy	Delete Electronic/ Recycle	No	Laboratory