



DOCUMENTATION RETENTION

There is a legal requirement to retain records, as these are critical in demonstrating diligence, management control, and compliance. Specifically there are requirements by the PHAC/CFIA for records pertaining to:

Biohazardous Materials Use Certificate (BMUC) and Associated Records (inventory, user)

These records must be reviewed on an ongoing basis and kept up-to-date.

Training

As the goal of training is to teach/develop skills, knowledge and competency/compliance; a variety of approaches can be used depending upon your target audience.

A brief review of training as a tool leads one in recognizing that training extends well past the academic class room setting and the undergraduate training received. These include:

- In-class
- Online
- Drop-in
- Off-site
- Video
- Documentation: cheat sheets, SOPs, Guide, check boxes
- Poster
- PSDS/MSDS
- Practical
- Refresher

Where ever possible it is advisable to keep training records, this can be formally in a central database, or informally as individuals signing and dating the date they reviewed the SOP, or when they have received a practical or specific targeted training. The Office the Chief Risk Officer (OCRO) retains training records for courses they offer, but it is the PI's responsibility to retain training records for those attained in the lab.

Note: the PHAC has a variety of videos and presentation that are FREE, offer a quiz and issue a certificate that can be scanned and retained for your files. (Check [the PHAC's e-learning portal](#))

Inventory

All regulated material must be retained in an inventory record and this can vary from a very high level inventory associated with your BMUC to a more detailed one in your lab. The level of detail is depended upon the risk associated with the material and its' scientific and monetary value. But is the ability to



demonstrate inventory control that is critical. Abandonment of samples deep in the 80°C freezer is not acceptable, which can occur when personnel leave the lab.

Facilities

A number of records need to be retained associated with the construction (drawings, physical specifications, certification and commission; to the yearly maintenance and testing that occurs. While some records are retained at a corporate level (Faculty, Facilities) others should be retained at local level (department, lab).

Lab maintenance in older buildings can be a challenge both to keep in good shape as well as having them seen as priority to have the work conducted. The best approach is to ensure you keep the record requesting the work to be completed, inform that the work is required under the Canadian Biosafety Standard and follow-up.

Decontamination

All decontamination technologies must be verified at the prescribed frequency (i.e., every 6 operating days for autoclaves).

Inspections/Compliance Monitoring

All inspections and compliance monitoring activities must be documented and retained. An excellent approach for a PI to use to both educate, and determine the level of compliance in the lab, is to delegate someone in the lab to conduct their own inspection or audit; OCRO can provide the forms. In addition, OCRO will retain records of their own compliance monitoring activities; which are provided to the PI after the inspections or as required.

Accidents/Incident Reports and Investigations

Every opportunity should be taken to learn from every investigation, so a formal process is to be followed. The University of Ottawa uses an on-line reporting system that tracks incidents and which must be completed immediately upon acknowledgement of an incident.