anenta

The Anenta guide to managing waste in Pharmacies



Anenta understands the challenges that regulatory requirements place on pharmacies. Where pharmaceutical waste is concerned, this affects space utilisation, resource management and staff training.

So, to assist you with compliance and management of pharmaceutical waste, we have developed this simple guide, which is designed to help all healthcare locations and pharmacies manage their waste.

The guide also clarifies the collection service arrangements procured by your NHS Commissioner.

Overview

This guide covers the management of all relevant waste streams.

It outlines interactions with other waste streams and the impact that has on the proper management of waste.

It gives guidance on the need to manage waste that includes:



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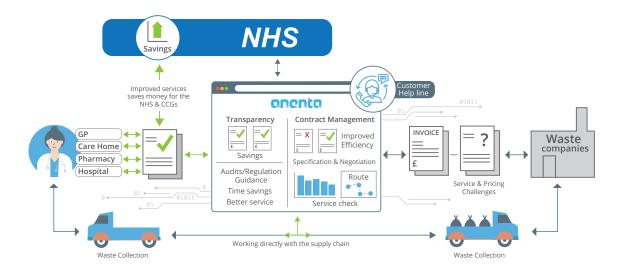


Who is Anenta?

If you are not already familiar with Anenta, we are the Managing Agent acting on behalf of NHSE&I. We ensure the proper and effective management of pharmaceutical waste.

We do not physically collect waste ourselves but instead manage the NHS commissioned contract relevant to your area, acting as the interface between you and your waste collection provider to ensure a high quality of service and value for money.

In short, we manage all aspects of pharmaceutical waste that your pharmacy generates; from operational management of your service queries, such as missed collections, to additional deliveries or frequency changes. All queries are logged and stored within your dedicated Anenta account.



Should you require additional information on our service please call **03301 222 143**To access your online account and log on please go to: https://vector.anenta.com

Your duties

All organisations responsible for producing healthcare waste, including primary care providers, GPs and pharmacies, have a duty to dispose of their waste appropriately and a Duty of Care to their staff in accordance with the Environmental Protection Act 1990.

This guide will give you the tools that you'll need to create and put into place an appropriate Waste Management Policy.

This will not only guide staff, but it will help to ensure that you are meeting your statutory obligations – including the completion of clinical waste pre-acceptance audits, without which hazardous waste, including healthcare items, cannot legally be removed from site.

This guide outlines:

- what you will need to consider/ understand
- who should do what?
- your responsibilities
- understanding and creating a successful Waste Management Policy.



Designated responsibility

To put a successful Waste
Management Policy in place, you will
need a designated, named individual
that has an understanding of waste
management and a responsibility for
this role. This individual should take
a lead and manage waste queries
from all staff, and should be the
named representative in your Waste
Management Policy.

What does your designated waste manager need to know?

Whoever takes responsibility for managing waste produced on site needs to have a clear understanding of the relevant guidance held within:

- HTM0701 Health Technical Memorandum
- Environmental Permitting
 Regulations 5.07 (this relates to pre-acceptance auditing).

They will also need a good knowledge of the site's Waste Management Policy.





Waste Management Policy

All healthcare settings need to have a Waste Management Policy. This is not an environmental statement. Instead, it is a policy that specifically states how the site manages its waste.

Successfully put into place, a good Waste Management Policy will:

- enable compliance with your regulatory duties
- create waste management efficiency
- · deliver appropriate segregation of waste
- ensure that all staff are appropriately trained in the waste types produced on site and how to dispose of them.





How do I create a fully compliant Waste Management Policy?

For guidance on putting an appropriate Waste Management Policy into place, you can either refer to the Health Technical Memorandum, or you can contact Anenta for advice.

Ideally, your Waste Management Policy should be one adopted centrally across your CCG/ ICS or one that has been developed nationally. Following this path will save you time.

As a guideline, your Waste Management Policy should detail:

- all waste types generated on site
- training delivered and in what format be that electronically, face-to-face, or through the provision of a procedure document.

Once produced, the Waste Management Policy needs to be:

- understood by all staff at all times
- available at induction and at all subsequent waste training session
- reviewed annually, in line with duty of care auditing.



Administrative compliance

To remain compliant with healthcare and clinical waste requirements:

- Hazardous Waste Consignment Notes (HWCN), concerning hazardous waste, need to be retained for a minimum of 3 years, and available to the Environment Agency should they request it
- Waste Transfer Notes (WTN), which concern non-hazardous waste including black bag waste, sanitary waste or recycling waste, need to be retained for a minimum of 2 years.

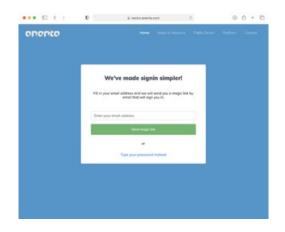
These documents can be stored as paper versions or electronically on your Anenta account, but must be filed and accessible for review in order that your healthcare setting complies with waste management regulations. This should be accessed via your Anenta account.

Segregation

Segregation of waste is critically important.

This is the process which ensures that waste is disposed of in the appropriate manner.

Waste items categorised as low risk should not be disposed of in highrisk waste collection receptacles. For example, recyclable items should not be placed in sharps containers. Content from these containers is incinerated, and cannot be recycled.





Your legal responsibilities

It is your legal responsibility to ensure that different types of waste are segregated and therefore disposed of correctly, in order that your pharmacy conforms with the Environmental Protection Act 1990, and any other related statutory instruments and guidance.

Training plays a key part in helping your organisation comply with this regulation.

This will help to ensure that your staff fully understand what waste is appropriate for which disposal type.

As part of this process, clear signage must be in place to enable all individuals to assess what waste should go into which container. This includes, for example, not placing food waste into a clinical waste bag.









External waste storage protocols

As a producer of healthcare and clinical waste, if waste is stored externally (including bags or containers housing domestic waste or recycling waste), it **must not** be accessible by the public.

All external waste containers must be lockable and kept locked at all times. Ideally, external waste containers should be held in a separate lockable waste compound.

Why is keeping bins locked important – even in a locked compound?

By keeping bins locked, you not only reduce the risk of waste being accessed by non-staff members, but you also enhance the likelihood that staff will put the appropriate waste in the correct container type externally. Staff who have to unlock a container are more likely dispose of the waste type correctly.

All of the above are assessed in a Duty of Care audit. The audit itself drives successful waste management. By conforming to all the above you will have created a successful Waste Management Policy by default.



Knowing your waste

Your commissioner (NHSE&I) has made provision for the disposal of particular waste types.

These waste types must be packaged correctly and securely for effective collection and disposal.

To assist you in understanding what should and should not be disposed of via these channels, we have outlined the breakdown of the waste types that are covered under your NHSE&I contract...

Patient returned medication - all forms

Pharmacies are obliged to accept unwanted medicines from patients. The pharmacy must segregate the waste appropriately to ensure they meet all requirements as set out in the Environmental Protection Act 1990 and associated statutory instruments.

In line with these rules, pharmacies must segregate non-hazardous medicines from hazardous medicines such as cytotoxic and cytostatic drugs. A sample list of these drugs is available within the documents section of your Anenta account.

For additional containment, please login to your Anenta account and make a request via a service ticket.





Disposal of unwanted stock

As indicated in the Essential Service 3 – Disposal of unwanted medicines Service Specification, a pharmacy can use the NHSE&I route to dispose of any unwanted and out-of-date stock. This must be segregated from Patient returns and labelled accordingly.

For additional containment, please login to your Anenta account and make a request via a service ticket.

Sharps waste / Orange bag / General and recycling / Sanitary

These waste types may not be disposed of under the NHSE&I contracts. NHSE&I waste contractors have been instructed not to accept sharps waste from pharmacies.

It is the pharmacy's responsibility to ensure they have adequate provision and suitable contracts in place to deal with waste generated from enhanced services such as Flu vaccinations.

For further details on this matter, please contact Anenta on 03301 222 143 or open a service ticket in your Anenta account.



Covid PPE Waste generated in Community Pharmacies

PPE waste generated in community pharmacy settings from a face-to-face consultation and/or interaction with a person who has been confirmed or is suspected to have COVID-19 should be double bagged, tied securely and kept separate from other waste for at least 72 hours before being disposed of as normal domestic residual waste.





Containers

NHSE&I has specified the container types that you are able to use for the disposal of non-hazardous or hazardous returned medicine or unwanted stock/waste; all UN approved packaging.

For sustainability reasons, and with specific regard to the issue of plastics usage nationally and globally, all containment supplied for non-hazardous waste will now be flat packed card containers. Cytotoxic and cytostatic medicine will need to be disposed of in the purple lidded hazardous plastic tubs. Below are sample images to give an idea of what to expect. The main point of note is the colour of the lid of the container or box. The body of the container can vary in colour.

Non-Hazardous medicines blue lid



Hazardous medicines purple lid



Hazardous Waste Consignment Notes and Waste Transfer Notes

Hazardous Waste Consignment Notes (HWCN)

HWCN's are a document requirement when transferring hazardous waste from one entity to another to ensure there is a traceability of the waste when moved from any premises.

This document must be kept for a minimum of 3 years and be signed by the consignee and the consignor.

As a result of Covid 19, the Environment Agency issued RPS C8 (Regulatory Position Statement) which allows for the consignor to forgo obtaining a signature due to social distancing purposes.

This will be updated in due course as the RPS is lifted. Further information is available through the link below:

social-distancing-when-signingand-handing-over-waste-transferand-consignment-notes-in-person

Anenta has received a large number of HWCNs which are being processed into each location's Anenta account, accessible by logging into https://vector.anenta.com/

Waste Transfer Notes (WTN)

WTN's are required for transferring non-hazardous waste, including patient returns and out-of-date pharmaceutical stock or commercial waste such as black bags and recycling. On behalf of NHSE&I, Anenta are only involved in the management of patient returns and out-of-date pharmaceutical stock with respect to the contracts procured.

RPS C8 is equally applicable to this waste type and we fully expect an update from the EA soon.

Anenta has advised all relevant waste contractors that we require an annual WTN - also known as a season ticket - covering all pharmacies serviced. This is completely legal and is being complied with in most cases.

As soon as these documents are issued, Anenta will load these to your Anenta account.







What is Vector?

Vector is Anenta's proprietary online waste management platform, which enables us to provide a bespoke service to you and other clients across the UK, managing collections from thousands of locations, every year.

Vector uses cutting-edge, real-time smart technology to enhance efficiencies. Handling everything from irregularities and overbilling, to aiding clients with complex waste and pre-acceptance audits, Vector brings clients, suppliers and other stakeholders to a single point of unified management with complete transparency.

How do I access Vector?

If you don't already have an account, you will need to complete the NHS registration form here.

Once registered, you will be given access to your Vector account. Simply click on the link sent to you in your email which will take you to the login page.

Using the email address submitted during registration as your username, click the 'send a magic link' button and a unique link will be emailed to you. This will take you directly into your Vector account. Magic links are used instead of a password and can only be sent to the registered email address on the account. This removes the need for password management and is highly secure.



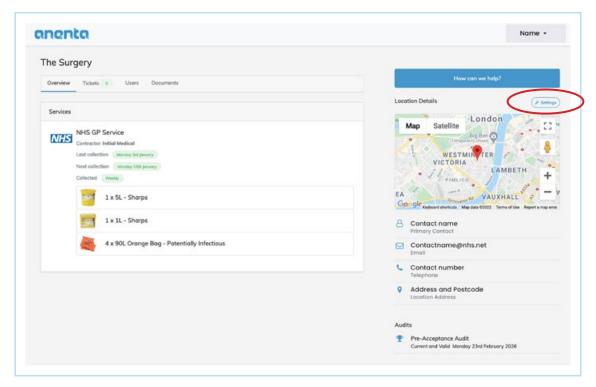
How do I use Vector?

Once your account has been set up and you have accessed it using the magic link, you will be able to see your home page with details of the waste types that Anenta manages on your behalf.

On your home page, you have the ability to amend your location details by clicking the blue **'Setting'** button ringed in red.

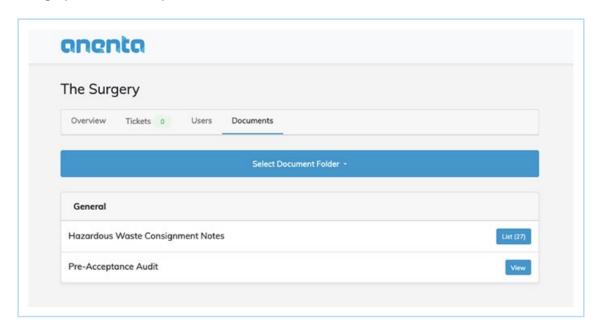
This sits below (the large blue **How can we help?** button).

The Overview section gives details about the items and quantities of waste collected including the last and next collection date as provided by the incumbent waste contractor. This section also details the collection frequency and relevant collection contractor name.

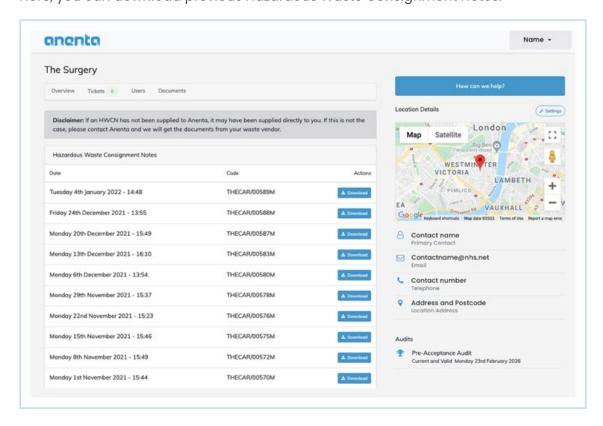


Within the documents section, you will find your compliance documentation and all collateral that relates to your waste management, of which this service guide is part.

By clicking on the Hazardous Waste Consignment Notes blue **'list'** button you will bring up details of all previous notes.



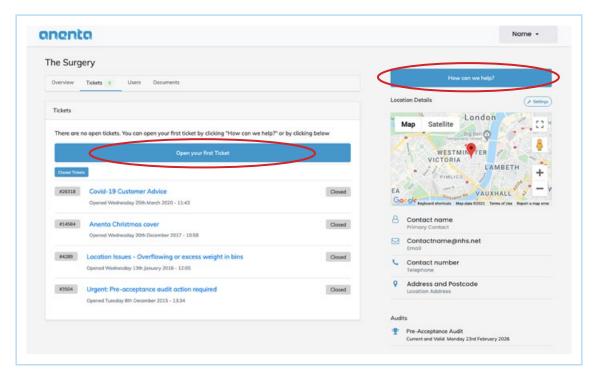
Here, you can download previous Hazardous Waste Consignment Notes.



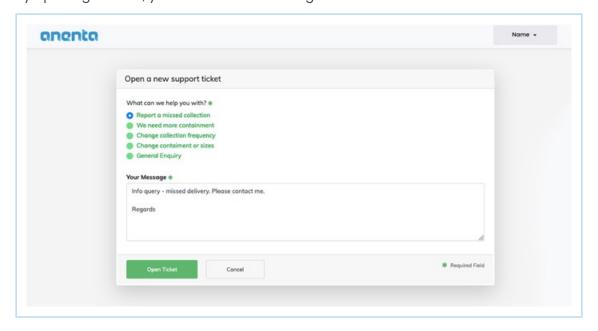
Opening tickets

You can open service tickets by clicking on the big blue 'How can we help' button on the right-hand side of the screen, or by using the long blue 'Open your first Ticket' bar. Vector tracks all requests and keeps an auditable trail for future reference.

Tickets that have been addressed are shown as closed.



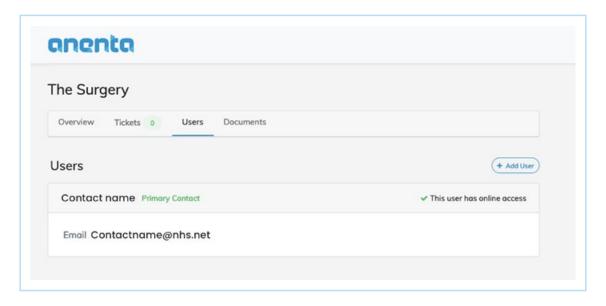
By opening a ticket, you will see the following screen:



Simply click on the relevant option and/or include a message that our team can follow up on your behalf.

Adding users

You have the option of adding users by clicking on the Users section in the toolbar. Simply click the 'add user' button and fill out the relevant details.



Further assistance?

For further guidance with your Anenta Vector Account in the pharmacy setting please contact Anenta on **03301222143** or open a service ticket in your Anenta account.





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