

Purpose

The purpose of this Document Retention Policy is to ensure that all productions maintain official records in accordance with the requirements of all applicable regulatory requirements and that official records no longer required are appropriately disposed of in a timely manner.

This policy provides guidelines for the retention of official documents as set forth by regulatory agencies and/or jurisdictions across the globe. It is also for the purpose of aiding production management in understanding their obligations in regard to retaining electronic and hard papered documents until deemed safe for deletion/disposal.

Policy

This policy represents the TWDC Risk Management Production Safety guidance to productions regarding the retention and disposal of records and the retention and disposal of electronic documents. The intent of this policy is that records should be retained only as long as necessary to meet legislative, fiscal, contractual, administrative, and operational requirements. Crew members and production management must ensure that documents for which they are responsible are accurate, complete, and are properly retained for the periods of time indicated in the policy, and then disposed of in accordance with this policy.

This policy adheres to the [Disney Corporate RIM](#) Departments record retention schedule. The appropriate region specific and country specific schedules are referenced (e.g., US, Canada, UK)

Covered Records

This policy applies to all records (referenced in the below table) generated during the course of a television or film production including but not limited to:

- Production Safety Program Orientation Introduction Acknowledgement (DPSO)
- Signed IIPP (PSG p A-1-1)
- Audits & Inspections (internal + external)
- Forms & Checklists
- Training Rosters / Toolbox Talks / Certifications
- Injury/Illness Records (if hardcopies were rec'd)
- Hazardous Waste records
- All pertinent safety documentation or written communications

Document Retention Policy



Category	RIMS #	Type of record	Location of Records	Retention Period	Region
Audits/Inspections	HS11	Internal safety audits, inspections and investigation of properties and operations (e.g., inspection checklists, SMS audits/inspections, production consultant audits/inspections, etc.)	SMS*	Resolution of Audit/ Inspection +6 yrs.	Global
Building Technical Standards & Specs	FAC02	Building technical standards and specifications that provide guidelines relating to building codes, design standards, etc. (e.g., engineering reports)	SMS (Move any that are in SharePoint into SMS)	Active +5	Global
Emergency Action Plan	HS17	Records of departmental plan to respond to facility or operational emergency (EAP).	SMS and Production Document Management System	Active +5 yrs	Global
Employee Exposure Records	HS10	Records related to employee exposure to toxic substances, bloodborne pathogens or harmful agents (e.g., employee notifications of hazardous situations, sampling/testing records related to employee exposure, etc.)	SMS SharePoint	Active +40 yrs	Global
Environmental Monitoring & Testing	ENV02	Monitoring of air, water, equipment for environmental concerns (e.g., asbestos, building sampling reports, indoor air, industrial hygiene monitoring, lead, water chemical analysis, water quality testing, etc.)	SMS	40 yrs	Global
Environmental Program Compliance Files	ENV03	Environmental plan and reports compliance filings (e.g., compliance statements, environmental plan, etc.)	SMS	6 yrs	Global
Environmental Site Assessments	ENV04	Reports that document the existing conditions of land purchased or sold or analyze the environmental impacts of proposed developments (e.g., Phase I, II, III Environmental Site Assessments)	SMS	Indefinite	Global
Equipment Maintenance Records	FAC04	Records that track maintenance of equipment (e.g., inspections, work orders, etc.)	Production Document Management System	Life of equipment	Global
Fire Department Operational Records	HS04	Records related to fire prevention operations (e.g., fire alarm system reports fire extinguisher inventory reports, fire inspection reports, fire life safety inspections, etc.)	SharePoint	Indefinite	Global
Fire Extinguisher Records	HS05	Records of fire extinguisher routine inspections and testing for equipment maintenance (e.g., fire extinguisher inspection logs, fire extinguisher test reports)	SMS SharePoint	Indefinite	Global
Hazardous Waste Manifest	ENV05	Records that track the movement of hazardous waste	SMS Clean Harbors	Indefinite	Global
Hot Work Permits	HS18	Records related to permits required for hot work operations.	SMS	1 yr	Global
Injury/Illness Records	HS12	US - Incident reports, investigations, OSHA logs, workers compensation documents, photos, etc.	SMS	<ul style="list-style-type: none"> • 30 yrs • 40 yrs 	Global Canada only

Document Retention Policy



Category	RIMS #	Type of record	Location of Records	Retention Period	Region
Incident/Illness Regulatory Tracking (CAL/OSHA 300 logs)	N/A US OSHA requirement	300, 300A, 301 incident reports	SMS SharePoint	5 yrs	US only
Incident Prevention Analysis	HS13	Analysis used to develop countermeasures to prevent safety incident recurrences (e.g., finding and action analysis, corrective action implementation evidence, etc.)	SMS	5 yrs	Global
Medical Records	HS02	Records related to employee medical condition and treatment including return to work, leave of absence and workers' compensation (e.g., audiometric testing, respiratory protection medical evaluations, employee treatment records, medical release, etc.)	SMS	<ul style="list-style-type: none"> Termination of employment + 30 yrs Termination of employment +10 Termination of employment +6 	US UK only Canada only
Permits	CMP18	Permits to operate equipment or registration/certifications (e.g., elevator/ escalator, overhead cranes, swimming pools, water discharge, pressurized air tanks, etc.)	Production Document Management System	Active +5 yrs	Global
Regulatory Agency Inquiries	HS07	Records of all communications and responses to inquiries received from government health & safety agencies (e.g., informal claims, inquiries, OSHA, EPA, DOT, etc.)	SMS	Indefinite	Global
Regulatory Inspections/Audits	HS15	Records of safety and environmental audits conducted by enforcement agency representatives (e.g., OSHA, EPA, DOT, etc.)	SMS SharePoint	Audit resolution +15 yrs	Global
Safety Data Sheets (SDS)	HS06	Records describing the hazardous substance, effects, safety precautions, antidotes and other specifically related information. (e.g., SDS).	Production Document Management System	Indefinite	Global
Safety Program Compliance Records	HS14	Checklists, certification records (e.g., forklift, aerial lift, etc.), compliance acknowledgements, safety management system records, etc.	SMS SharePoint	Active +10 yrs	Global
Training Records (Individual)	HS03	Records documenting individual employee attendance of training program health, safety and/or environmental training (e.g., training rosters, toolbox talks, certifications, production safety orientation acknowledgment, etc.)	Training database Production Document Management System Contract Services	Termination of employment +5 yrs	Global
Training Records (Group)	HS19	Records documenting group attendance at training sessions for health, safety and/or environmental training (e.g., attendance rosters, sign-in sheets, etc.)	Training database Production Document Management System Contract Services	10 yrs	Global
Training Curriculum & Course Materials	HS20	Training curriculum and course materials for health & safety and/or environmental training.	SharePoint	Active +10 yrs	Global

* Note: Production Safety's current Safety Management System (SMS) program used is Cority.