



Record Retention Programs

Product manufacturers produce many types of records during the design, manufacture, sale, and service of their products. Such records may include design calculations, hazard analyses, product prototypes, inspection reports, test reports, service manuals, customer complaints, meeting minutes, and correspondence. Not all records need to be maintained forever. Record retention programs are used to ensure that records that are no longer useful to the manufacturer are destroyed. This handout provides information for evaluating a record retention program for five key elements typically found in successful programs.

Record Inventory

- Is there a master inventory of all product safety-related records produced by the organization?
- Does this inventory address records in all media and formats, such as electronic documents or physical prototypes?
- Does this inventory identify who is responsible for creating the records, who is responsible for reviewing the records, and where the records are located?

Retention Schedule

- Is there an organized procedure for determining the length of time that each record should be maintained for business and legal reasons?
- Has a master retention schedule been created for each document in the record inventory?
- Does this retention schedule address all records, including reproductions?
- Has senior management approved this retention schedule?

Destruction Procedures

- Are there written procedures for destroying all records once their retention period has expired?
- Do the procedures include steps that should be taken to suspend destruction and to protect records that are subject to pending investigation, litigation, or audit?
- Are records systematically destroyed when permitted by the program?
- Are records maintained of all records that are destroyed?

Employee Training

- Are all employees trained on their responsibilities under the record retention program, as necessary?
- Are employees reminded regularly about the importance of following the program?

Program Control

- Is one person responsible for the operation of the program?
- Are documents maintained to support the development and implementation of the program?
- Is the program reviewed periodically to make sure that it is functioning as intended?
- Are proposed changes to the program reviewed and approved by senior management?



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