

The purpose of this document is to provide guidance on the retention and disposal of documents (including “personal data” under the General Data Protection Regulation 2016/679 (“GDPR”), and the Data Protection Act 2018 (subject to royal assent, the “DPA”)) (together the “Data Protection Laws”). “Documents” in this context means all documents held or controlled by us in any format or media that are located in the UK.

As a matter of law, our documents (including books, records and financial reports) must accurately reflect the underlying transactions and represent the true state of the business. They are an essential part of doing business correctly, honestly and openly and protect us, our customers and those we work with. We must ensure that the record keeping of our documents is accurate, that we store them safely and for the time periods prescribed by the law and that we do not destroy or alter any information or data that must be kept for litigation, an investigation or other legal reasons. Equally, we must not retain documentation where the limitation period has expired and there is no legal justification for retention.

The retention schedule sets out the recommended retention periods for Information Management records. The retention schedule is intended to enable users of this document to simply refer to the relevant type of document that they are interested in and then determine the relevant retention period from that schedule. If a document is not covered by any retention schedule, reference can be made to the items listed in the General Guidance section within the Records Management Policy in determining an appropriate retention period.

SBU/functions should refer to these retention schedules and the general guidance below in reviewing their current existing document retention and disposal practices.

The DPO within the SBU/function has the responsibility for establishing and implementing effective practices and procedures across it to give effect to this document.

Information Management documents

Record description	Retention period	Form in which to be kept	Reason and comments
Information management policies	Life of company	Any	Best practice.
Retention and disposal schedules	Life of company	Any	Best practice.
Information security policies	Life of company	Any	Best practice.
Guidelines and procedures on management, retention and disposal of documents	Life of company	Any	Best practice.
Disaster recovery plan	Each plan should be kept until new plan is implemented	Any	Best practice.
Information surveys and record audits	5 years	Any	Best practice.
System description manuals	Life of company	Any	Best practice.
System maintenance log	As long as any information kept on system still exists	Any	Best practice.
Quality control log in relation	As long as any information	Any	Best practice.

Record description	Retention period	Form in which to be kept	Reason and comments
to scanning	kept on the system still exists		
Details of documents and records transferred to storage (including on and off-site)	Until document/record is retrieved from storage and disposed of	Any	Best practice.
Lists or records of documents disposed	Life of company	Any	Best practice.
Records of tracking and location systems	Until system is superseded	Any	Best practice.
<p>Documents that relate to demonstrating to a software publisher proof of entitlement to use the software including the following:</p> <ul style="list-style-type: none"> • Software purchase agreements; • Framework or enterprise contracts for the purchase of software; • Software licences; • Maintenance and support contracts for the software; • Renewals of licences of the software; • Licences (or other documentation supplied by the software publisher) of upgraded versions of software; • Where software is purchased as a boxed set fully packaged product, all documentation (including the software vendor's terms and conditions, serial numbers, 	<p>For as long as the software (whether the original version or any revised version) is used in the SBU/Function <u>plus the longer of</u> the following periods:</p> <ul style="list-style-type: none"> • the period within which the contract with the software publisher allows the software publisher to conduct an audit as to proof of entitlement after the software has ceased to be used; and • 6 years after the software has ceased to be used 	Original	<p>Proof of entitlement to use software if Balfour Beatty/SBU/Function is audited by a software publisher.</p> <p>Note that the retention period still applies even if the original publisher of the software is taken over by someone else – if an audit is conducted by the new publisher, we will have to demonstrate to the new publisher proof of entitlement from the very start of usage of that software (i.e. from when it was acquired from the original software publisher).</p> <p>The key point to remember is that SBU/Functions need to demonstrate to the software publisher that there is no break in the “chain of entitlement” for as long as the software (whether in its original version or any upgraded version) is used.</p> <p>SBU/Functions should also refer to any Software Asset Management policy or guidelines published by Balfour Beatty Group IT</p>

Record description	Retention period	Form in which to be kept	Reason and comments
<p>licence certificates, CD cases, media (i.e. CD or floppy disk) that is included within that box;</p> <ul style="list-style-type: none"> • Where software is purchased as a boxed set and the serial number is printed on the box, the box itself; • Invoices re the purchase of the software (original or any update) or any subsequent maintenance or support; and • Contact details of the suppliers from whom the software (or any upgrades) is purchased. 			<p>from time to time and ensure that they retain proof of entitlement documentation in accordance with any such policy or guideline.</p>
<p>Notices provided (and/or, where applicable, consents obtained) in relation to the processing of personal data (including sensitive personal data)</p>	<p>For as long as data is processed and held in respect of a living individual and such retention of the data is necessary in respect of the purpose for which it was originally collected</p>	<p>Any</p>	<p>Statutory compliance¹.</p>
<p>Information, records or correspondence required under or for claims under the Building Safety Act 2022 (BSA), Fire Safety (England) Regulations 2022 or Defective Premises Act 1972 including without limitation prescribed information under BSA golden thread requirements</p>	<p>See retention schedule for Quality Assurance LGL-RM-0043j</p>	<p>Original hard copy and digital copy. Format to meet BSA 'golden thread' requirements once available.</p>	<p>the Building Safety Act 2022 (BSA), Fire Safety (England) Regulations 2022 and Defective Premises Act 1972 as amended.</p>

¹ Relevant provision is Article 5(1)(e) GDPR.