

# BBC Records Management Corporate Policy

## Why this policy matters

We rely on having reliable records of our activities and decisions to operate effectively and maintain public trust.

For this policy, a **'BBC record'** is defined as evidence of activities performed, events occurred, results achieved, decisions or statements made. Records are created or received by the BBC in routine transaction of its business or in pursuance of its legal and regulatory obligations. Records may be in any format e.g. digital and physical.

Managing records is important if they are to be used in the future as evidence of BBC activities, to help understand why decisions were made, and to provide information which helps inform future decision-making or to exploit our assets. The BBC is committed to safeguarding records that support the business and to comply with legal obligations.

Poor records management puts the BBC at risk of:

- Regulatory breaches, particularly around Freedom of Information and Data Protection obligations.
- Loss of critical business information needed for operations and decision-making.
- Damage to reputation if we cannot demonstrate why and how decisions were made.
- Increased costs from keeping unnecessary records or being unable to find information when needed.
- Legal vulnerability if we cannot produce required evidence.

## Who this policy applies to

This Policy applies to you if you work for, or represent, the BBC or one of its subsidiaries. This includes, but is not limited to:

- employees, full-time or part-time
- those on a fixed term or temporary contract
- freelancers, contractors or consultants
- volunteers or interns

## The essential things you must do or not do

These high-level essential mandatory requirements are the most important for you to understand and follow to meet the Policy objectives.

In addition to these, there are detailed requirements and best practices outlined in supporting procedures, guidance, and standards linked below. Read this information when you need to understand the detail.

If you have any concerns or conflicting priorities that prevent you following essential requirements, please discuss them with one of the people listed in the section under

‘Where to go for help and exceptions’. Without an approved exception, breaches may put the BBC at risk and may result in disciplinary action, up to and including dismissal, or termination of our relationship with you.

### **Creating or receiving records**

Good recordkeeping provides confidence in the validity, accuracy and accessibility of the information.

1. If you make significant business decisions or lead key activities, you must ensure that they are properly recorded.

Records we create may include policies, procedures, decisions, records of events, projects, contracts, employment and financial transactions, and all related correspondence.

Record adequate, but not excessive, information that accurately reflects the action, communication, or decision.

### **Security and storage**

Good security and storage of records protects them from loss, damage or unauthorised access while making them available when needed.

2. You must store **records** only in BBC systems and locations

Systems and storage facilities where records are kept must provide appropriate backup, disaster recovery and security controls to protect records.

### **Routine destruction of transitory records**

A transitory record refers to a type of document or data that is only temporarily needed and has little or no business value. Transitory records do not follow the Corporate Records Retention Schedule and may be disposed of when their immediate use has expired. Transitory records may be produced in the preparation of other records that supersede them; used as copies of convenience; or have no business value, e.g. personal communications.

Documents or data that are only temporarily needed and/or have little or no business value may be routinely destroyed, to minimise data protection and information security risk.

Examples of transitory records are:

- a. Draft/interim documents not circulated (when there is a final version)
- b. Emails with no future value
- c. Copies of convenience
- d. Duplicates
- e. Printouts (when electronic copy is the master copy)

- f. External reference material (when no longer required)
- g. Personal/ non-business documents

See the Email Rules for information on how email is processed at the BBC.

### **Retention and disposal of BBC Records**

Following the Corporate Records Retention Schedule helps us meet our regulatory obligations and maintain appropriate records of BBC activities.

#### **3. You must follow the BBC's Corporate Retention Schedule**

The Corporate Retention Schedule defines when to keep, archive or destroy BBC records based on legal and regulatory requirements, and also business operational needs.

**Note: Transitory records are not subject to the Corporate Records Retention Schedule.**

Where records have been identified as having long-term value to the BBC, you must deliver them to the BBC Archive.

Keeping records longer than necessary increases the risk of security breaches and the subsequent possible reputational damage.

Evidence should be kept of destruction decisions regarding BBC records.

You may read more about how long records must be retained for in the Corporate Records Retention Schedule.

#### **4. You must **not** destroy or delete records that are subject to a litigation hold. This includes transitory records.**

A litigation hold (sometimes also referred to as a 'legal hold' or a 'document preservation notice') from the Legal team overrides all record retention and disposal requirements. The BBC's legal team issue a litigation hold when litigation is pending or reasonably anticipated. This then ensures that all relevant information (both physical and electronic) is preserved.

For further guidance, about current legal holds contact the BBC Litigation Department.