



# GUIDE TO THE STANDARD FOR RETENTION OF PROJECT DOCUMENTATION

VERSION 2.0  
PUBLISHED FEBRUARY 17, 2021



**ENGINEERS &  
GEOSCIENTISTS**  
BRITISH COLUMBIA



# TABLE OF CONTENTS

<b>PREFACE</b>	<b>ii</b>
<b>ABBREVIATIONS</b>	<b>iii</b>
<b>DEFINITIONS</b>	<b>iv</b>
<b>VERSION HISTORY</b>	<b>vi</b>
<b>1.0 INTRODUCTION</b>	<b>1</b>
1.1 OVERVIEW	1
1.2 PURPOSE OF THIS GUIDE	1
1.3 ROLE OF ENGINEERS AND GEOSCIENTISTS BC	2
1.4 SCOPE	2
<b>2.0 REGULATORY FRAMEWORK</b>	<b>4</b>
<b>3.0 STANDARDS FOR PRACTICE</b>	<b>6</b>
3.1 WHAT IS THE PURPOSE OF RETAINING PROJECT RECORDS	6
3.2 WHAT DOCUMENTATION SHOULD BE RETAINED AS RECORDS AND WHEN	6
3.3 WHAT MAKES A GOOD PROFESSIONAL RECORD	7
3.4 HOW ARE TRUSTWORTHY DOCUMENTS CREATED AND MANAGED	8
3.5 WHAT SHOULD BE CONSIDERED	9
3.5.1 Creating Documents	9
3.5.2 Receiving Documents	9
3.5.3 Coding or File-Naming Documents	9
3.5.4 Revising Documents	9
3.5.5 Filing Documents	9
3.5.6 Issuing Documents	10
3.5.7 Archiving Records	11
3.5.8 Storing Records	11
3.5.9 Destroying Records	11
<b>4.0 REFERENCES AND RELATED DOCUMENTS</b>	<b>12</b>

# PREFACE

This *Guide to the Standard for Retention of Project Documentation* (the “Guide”) was developed by Engineers and Geoscientists BC to explain the standards of practice, conduct, and competence for Professional Registrants when creating, using, and retaining Records related to their professional practice.

This current revision was undertaken to provide clarity in guidance to Professional Registrants, in accordance with the scheme and requirements of the *Professional Governance Act* and Engineers and Geoscientists BC’s Bylaws.

This document outlines the appropriate standards of practice, conduct, and competence to be followed at the time it was prepared. However, this is a living document that is to be revised and updated as required in the future, to reflect the developing state of practice.

# ABBREVIATIONS

ABBREVIATION	TERM
BC	British Columbia
CADD	Computer-Aided Drafting and Design

# DEFINITIONS

The following definitions are specific to this Guide. These words and terms are capitalized throughout the document.

TERM	DEFINITION
<b>Act</b>	The <i>Professional Governance Act</i> , S.B.C. 2018, c. 47.
<b>Bylaws</b>	The Bylaws of Engineers and Geoscientists BC made under the <i>Act</i> .
<b>Document(s)</b>	Includes any physical or electronic Record, including but not limited to a report, certificate, memo, specification, drawing, map, or plan, that conveys a design, direction, estimate, calculation, opinion, interpretation, observation, model, or simulation that relates to the Regulated Practice.
<b>Documentation</b>	See the definition for “Record”.
<b>Engineers and Geoscientists BC</b>	The Association of Professional Engineers and Geoscientists of the Province of British Columbia, also operating as Engineers and Geoscientists BC.
<b>Firm</b>	As defined in the <i>Act</i> : “(a) a legal entity or combination of legal entities engaged in providing services in respect of a Regulated Practice, or (b) a ministry or agency of the government that the Lieutenant Governor in Council may prescribe by regulation, but does not include a legal entity or combination of legal entities that may be exempted from this Act by regulation of the Lieutenant Governor in Council.”
<b>Guide</b>	A guide to a program or regulatory topic, published by Engineers and Geoscientists BC. These include Guides to quality management standards that in accordance with the <i>Act</i> and Bylaws define professional obligations related to specific processes and explain the minimum standards of practice, conduct and competence expected from Professional Registrants and Firms.
<b>Professional Registrant</b>	A registrant of Engineers and Geoscientists BC who is registered in one of the following categories of registrants: (a) professional engineer; (b) professional geoscientist; (c) professional licensee engineering; (d) professional licensee geoscience; (e) life member prior to 1998; (f) honorary life member.
<b>Record (Documentation)</b>	Any Document that is evidence of Regulated Practice activities, events, or transactions, or is evidence that a Professional Registrant has met their professional and contractual obligations.

TERM	DEFINITION
<b>Records Management</b>	The systematic control of all Records, regardless of media, from creation to disposal.
<b>Regulated Practice</b>	As defined in the <i>Act</i> and the <i>Regulation</i> , the carrying on of a profession by a registrant of a regulatory body, which for the purposes of this Guide means the practice of professional engineering or the practice of professional geoscience.
<b><i>Regulation</i></b>	The <i>Engineers and Geoscientists Regulation</i> , OIC 2021/037.

# VERSION HISTORY

VERSION NUMBER	PUBLISHED DATE	DESCRIPTION OF CHANGES
2.0	February 17, 2021	Updated the content and terminology to conform with the <i>Professional Governance Act</i> and updated Bylaws; changed the main title to “Guide to the Standard for Retention of Project Documentation”; changed the document category from “quality management guidelines” to “quality management guides.”
1.3	January 9, 2018	Updated the format to align with the new Engineers and Geoscientists BC brand; minor editorial corrections.
1.2	October 7, 2013	Minor editorial corrections.
1.1	February 25, 2013	Minor editorial corrections.
1.0	May 2012	Initial version.



# 1.0 INTRODUCTION

## 1.1 OVERVIEW

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- 1.1.1 Engineers and Geoscientists BC is the regulatory and licensing body for the engineering and geoscience professions in British Columbia (BC). To protect the public, Engineers and Geoscientists BC establishes, monitors, and enforces standards for the qualifications and practice of Professional Registrants.
- 1.1.2 Engineers and Geoscientists BC provides practice resources to Professional Registrants to assist them in meeting their professional and ethical obligations under the *Act* and Bylaws. One category of these practice resources is Guides to quality management standards, which explain the standards of practice, conduct and competence for quality management in professional activities.
- 1.1.3 This *Guide to the Standard for Retention of Project Documentation* explains the standards of practice, conduct, and competence for Professional Registrants related to the retention of project Documentation. This Guide explains how Professional Registrants should create, use, and store evidence of engineering or geoscience-related activities, events, or transactions, or evidence that a Professional Registrant has met their professional and contractual obligations.
- 1.1.4 This current revision was undertaken to provide clarity in guidance to Professional Registrants, in accordance with the scheme and requirements of the *Act* and the current

Bylaws, and to assist Professional Registrants in upholding their professional obligations under the *Act* and Bylaws.

## 1.2 PURPOSE OF THIS GUIDE

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- 1.2.1 This document explains the standards of practice, conduct, and competence expected of Professional Registrants when creating, using, and retaining Records related to their professional practice. This Guide provides a common approach applicable to all Professional Registrants who create Records as part of their professional activities.
- 1.2.2 The specific objectives of this Guide are to:
1. describe the minimum standards for retention of project Records by Professional Registrants;
  2. assist Professional Registrants in establishing and maintaining a documented quality management procedure for retaining complete project Records that comply with the requirements of the Bylaws;
  3. explain what types of Documents constitute Records that must be retained;
  4. describe the qualities and procedures necessary to ensure that retained Records are useful and reliable;
  5. describe the procedures necessary for the creation, use, and retention of reliable Records; and

6. provide guidance on how to meet the quality management requirements under the *Act* and Bylaws when engaged in creating, using, and retaining Records in a Regulated Practice.

### 1.3 ROLE OF ENGINEERS AND GEOSCIENTISTS BC

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- 1.3.1 This Guide and the current revision was developed under the direction of Engineers and Geoscientists BC's Council and, prior to publication, underwent final legal and editorial reviews. This Guide forms part of Engineers and Geoscientists BC's continuing commitment to establishing and monitoring the quality of professional services that Professional Registrants provide to their clients and to the public.
- 1.3.2 Retention of project Documentation is a requirement that is critical for assisting Professional Registrants in fulfilling their professional obligations, including holding paramount the safety, health, and welfare of the public. Retention of project Documentation ensures that Professional Registrants are appropriately keeping Records of the professional engineering or professional geoscience work they are carrying out or delegating to a subordinate.

### 1.4 SCOPE

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- 1.4.1 Proper and appropriate retention of complete project Documentation is fundamental to upholding the *Act* and Bylaws, including the Code of Ethics in Schedule A of the Bylaws, which require that all Professional Registrants hold paramount the safety, health, and welfare of the public, including the protection of the environment, and the promotion of health and safety within the workplace.
- 1.4.2 As required by the Bylaws, Professional Registrants must meet the requirement for retention of complete project Documentation for all projects. The Documents and Records created by Professional Registrants are highly variable, depending on the circumstances and requirements of the work. As such, this Guide establishes the requirements for professional practice in broad terms. Professional practice in specific industries may require compliance with other legislative or regulatory requirements for the retention of Documents and Records. This Guide establishes the minimum expected of Professional Registrants.
- 1.4.3 This Guide is intended to assist Professional Registrants in establishing and maintaining a documented quality management procedure for retaining complete project Records that complies with the requirements of the *Act* and of the Bylaws by addressing the following:
  - which project Documents to retain as Records;
  - the roles and responsibilities for controlling and retaining project Records;
  - digital Record keeping;

- retention period(s); and
- considerations for effective Document control and retention.

- 1.4.4 For Professional Registrants employed by Firms, Documents and Records are generally the property of the Firms; therefore, the means by which Firms manage and retain Documents and Records are often established by the Firms themselves. Professional Registrants employed by Firms are not required to maintain a separate set of Documents and Records when the means and methods by which the Firms retain project Records are consistent with the intent of the Bylaws and this Guide. Engineers and Geoscientists BC recognizes that this may mean that Professional Registrants may lose access to professional engineering or professional geoscience Documents and Records when they leave Firms, or in the event of dissolution or bankruptcy of Firms.
- 1.4.5 Project Records in the context of this Guide include Documents related to any continuing Regulated Practice, which may not have a discrete start and end date, may result in or apply to a service or product, and may occur in any industry.
- 1.4.6 Terminology used within an industry may not match the terminology used in this Guide. However, the obligations of Professional Registrants in all industries remain the same: to ensure that the retention of Documents and Records meets the intent of the *Act*, Bylaws, and this Guide.

## 2.0 REGULATORY FRAMEWORK

2.1 Section 57(1) of the *Act*, Standards of conduct and competence, states that:

“Subject to subsections (2) and (3), the council of each regulatory body must make bylaws establishing the following:

- (a) standards of professional and ethical conduct for registrants, which standards may be different for different categories or subcategories of registrants;
- (b) standards of competence for registrants, which standards may be different for different categories or subcategories of registrants or different areas of practices;”

...

2.2 Section 7.3.2 of the Bylaws, Standard for Retention and Preservation of Complete Project Documentation, states that:

“(1) A Professional Registrant must establish, maintain, and follow documented procedures for the retention and preservation of complete project documentation related to the Regulated Practice engaged in by the Professional Registrant, which documentation is not limited to, but must include if they existed, physical and electronic versions of

- (a) correspondence,
- (b) investigations,

- (c) surveys,
- (d) reports,
- (e) data,
- (f) background information,
- (g) assessments,
- (h) designs,
- (i) specifications,
- (j) field reviews,
- (k) testing information,
- (l) models,
- (m) simulations,
- (n) quality assurance documentation,
- (o) drawings,
- (p) calculations and
- (q) copies of all Authenticated Documents.

...

- (3) Complete project documentation must be retained and preserved for at least 10 years after the later of the completion of the project or when the documentation is no longer used.

...

- (5) A Professional Registrant who is employed by or under contract with a Registrant Firm may satisfy their obligations pursuant to this section of the Bylaws with respect to any project documentation produced during the course of their

employment or contract with the Registrant Firm by

- (a) taking reasonable steps to confirm that
  - (i) the Registrant Firm has in place documented policies and procedures for the retention and preservation of all project documentation produced by the Professional Registrant during the course of or related to their employment or contract with the Registrant Firm, and
  - (ii) that the documented policies and procedures referred to in paragraph (a)(i) are in accordance with the requirements set out in subsections (2), (3), and (4), and
- (b) consistently adhering to the documented policies and procedures of the Registrant Firm with respect to retention and preservation of project documentation established pursuant to subsection (4)(a) during the course of the Professional Registrant's employment or contract with the Registrant Firm.

- (6) A Professional Registrant who ceases to be employed by or under contract with a Registrant Firm may continue to satisfy their obligation to retain and preserve complete project

documentation pursuant to subsection (3) by ensuring that

- (a) an agreement is in place with the Registrant Firm regarding the retention and preservation of all project documentation produced by the Professional Registrant during the course of their employment or contract with the Registrant Firm, and
- (b) the agreement referenced in paragraph (a) requires either the Professional Registrant or the Registrant Firm, or both, to retain and preserve all project documentation in accordance with the requirements in this section of the Bylaws.

2.3 This Guide is intended to assist Professional Registrants in understanding the minimum standard of practice and in fulfilling their professional obligations, in accordance with section 7.3.2 of the Bylaws. Failure to meet the requirements as set out in this Guide could be evidence of incompetence, negligence, unprofessional conduct, or breach of the Bylaws, and may lead to disciplinary proceedings by Engineers and Geoscientists BC.

# 3.0 STANDARDS FOR PRACTICE

## 3.1 WHAT IS THE PURPOSE OF RETAINING PROJECT RECORDS

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3.1.1 Retaining complete and easily retrievable project Records is critical to the professional practice of Professional Registrants. It allows for an orderly handoff from one project manager or other team member to another, even when the handoff is unexpected or on a short timeframe. It can make the difference between a well-run project that meets client objectives and professional standards, and one that does not. After the completion of the project or work, complete Records enable Professional Registrants to demonstrate that they have met the intent of section 7.3.2 of the Bylaws. The Records may also allow Professional Registrants to resolve issues, meet legal and regulatory requirements, document decision-making procedures, defend claims, facilitate undertaking future work, and/or make intellectual property readily retrievable for future solutions.

## 3.2 WHAT DOCUMENTATION SHOULD BE RETAINED AS RECORDS AND WHEN

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3.2.1 A Record is anything that contains information that needs to be kept as evidence of a decision or action, regardless of medium or form. The types of Documents generated vary widely across areas of Regulated Practice, so the question of

whether a Document should be retained as a Record is best answered by examining the purpose of the Document. Documents should be retained as Records if they are evidence of professional engineering or professional geoscience-related activities, events, or transactions, or are evidence that Professional Registrants have met their professional and contractual obligations.

3.2.2 Documents associated with a project often include items that are not relevant to the Regulated Practice, such as insignificant correspondence about lunches, appointment times, newsletters, advertisements, and social events that have no continuing value as Records. These Documents need not be retained as Records and may be discarded once they are no longer useful to Professional Registrants.

3.2.3 Records may be created and stored in various media. It is the function, not the form that determines whether a Document should be retained as a Record. Evidence of Regulated Practice activities, events, or transactions, or evidence that a Professional Registrant has met their professional and contractual obligations might be in:

- handwritten notes;
- voice mail;
- email; or
- files created by software used for
  - word processing,
  - spreadsheets,
  - Computer-Aided Drafting and Design (CADD), or
  - presentations.

- 3.2.4 Records may be in hard copy or digital format and may be stored in file cabinets or on hard drives, cloud storage, CDs, DVDs, and other digital media. To add an additional level of complexity, Records may even be created and stored on websites and in social media such as Twitter®, LinkedIn®, Facebook®, or a blog.
- 3.2.5 Records are retained based on the value of their content rather than the means or format by which they are created, stored, and distributed. Documents that are evidence of professional engineering or professional geoscience-related activities, events, or transactions, or are evidence that Professional Registrants have met their professional and contractual obligations, must be retained as Records for a minimum of 10 years after the end of the project or 10 years after a Document used in continuing work is no longer in use.
- 3.2.6 Statutory or regulatory requirements in a jurisdiction, such as the provincial *Limitation Act*, may mandate retention periods longer than 10 years. Business and contractual obligations must be considered and may also necessitate longer retention periods. Current and anticipated litigation, audits, government inspections, or other legal issues may require that the destruction of Documents be postponed, even after the 10-year retention period mandated by Engineers and Geoscientists BC in the Bylaws and this Guide has elapsed.
- 3.2.7 Conversely, clients may request that Professional Registrants surrender or destroy Documents or Records before the 10-year retention period mandated by Engineers of Geoscientists BC in the Bylaws and this Guide has elapsed. Professional Registrants should be aware that contractual terms do not supersede or eliminate their professional responsibility

to maintain Records for 10 years after the later of the completion of the project or when the Documentation is no longer used.

- 3.2.8 Professional Registrants should exercise professional judgment to ensure that the Records created and retained are appropriately complete given the nature of the work, the specifics of the situation, and any applicable Records retention program.

### 3.3 WHAT MAKES A GOOD PROFESSIONAL RECORD

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- 3.3.1 Documents being retained as Records may be used as evidence in court or administrative tribunals, including hearings of Engineers and Geoscientists BC's Discipline Committee. No matter what form or media the Documents are in, certain qualities make Documents reliable as evidence, and therefore good Records:
- **Authenticity** – being able to show, through security and access control, the origin of the Document and the identity of those who created and revised it
  - **Integrity** – being able to show that controls are in place to prevent the material content and meaning of the Document being changed after its creation or acceptance as a final version
  - **Accuracy** – being able to show that the Document is correct and factual
  - **Completeness** – being able to show that all parts of the original Document are intact
  - **Trustworthiness** – being able to demonstrate that the Document control and Records Management systems provide authentic, reliable, accurate, and complete Records

3.3.2 For ease of organization, Documents including emails should have easy references that are project-specific and related to the subject of the Document. The project name alone may not provide enough context for Document-retention purposes.

3.3.3 When Documents encompassed only hard-copy originals, it may have been simpler to provide Records that met the qualities listed in [section 3.3.1](#) of this Guide. However, these days with many or most Records being initiated and retained in digital formats, more consideration must be given to the procedures and systems for the control of Documents and Records to safeguard the qualities listed in [section 3.3.1](#) of this Guide.

## 3.4 HOW ARE TRUSTWORTHY DOCUMENTS CREATED AND MANAGED

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3.4.1 An effective program to manage Documents and Records must generally be in place before the start of the Regulated Practice activity, so that any Document created or received throughout the course of the project or work can be trusted as a Record. The retention of professional engineering and professional geoscience Documents should be an integral part of an overall Records Management program. An effective program will typically include a policy, processes or procedures, and training.

3.4.2 A policy for managing Documents and Records should include:

- definitions of what constitute Documents and Records;
- criteria for determining which Documents are considered Records and therefore must be retained;
- rules for how long Documents should be retained;
- descriptions of roles, responsibilities, and accountability for Documents and Records throughout their life cycles;
- rules to be followed throughout the life cycles of Documents and Records;
- references to any related processes and procedures; and
- rules related to confidentiality and security considerations.

3.4.3 Processes and procedures should be put in place to control Documents and Records through their life cycles, describing how they will be created, revised, received, coded or named, filed, issued, archived, stored, and destroyed.

3.4.4 Optional systems, such as applications that provide Document control and/or storage, may help facilitate effective Document and Records Management.

3.4.5 All users, especially the managers of Documents and Records, should be trained on the policies, procedures, and systems. This will improve the effectiveness of the overall program.



## 3.5 WHAT SHOULD BE CONSIDERED

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### 3.5.1 CREATING DOCUMENTS

- 3.5.1.1 To create Documents that may be relied upon as Records, consider using the following methods:
- develop and use standard templates and forms that list the names of the author(s) and identify the dates that Documents are created or revised, so the same required information is included in each Document; and
  - complete the Document properties or metadata associated with electronic files (which do not usually automatically appear), so information important to the Document and its audit trail is retained as part of the Document.

### 3.5.2 RECEIVING DOCUMENTS

- 3.5.2.1 When Documents were in hard copy format and arrived by traditional mail or courier, processes to code them, distribute them to those who needed to act on them, and file them could all be managed by one person or one position. Today, digital files are often received by everyone in a Firm. Each recipient must understand how to manage Documents they receive by:
- recording when, how and by whom the Document was received;
  - addressing the Document's contents and recording that action;
  - assessing whether the Document is considered a copy that may be kept for convenience as long as it is useful, or is a Record that must be retained; and
  - if the Document is a Record, how it should be retained.

### 3.5.3 CODING OR FILE-NAMING DOCUMENTS

- 3.5.3.1 Properly coding or labelling hard copies helps facilitate filing and retrieval of paper files in their appropriate folder in a file drawer.
- 3.5.3.2 Standard file-naming with appropriate components for electronic files can help identify where to file a Document and help retrieve it at a later date.

### 3.5.4 REVISING DOCUMENTS

- 3.5.4.1 An audit trail of revisions is necessary for a Record to be considered reliable and trustworthy. This can be accomplished by providing a revision history of who created, revised, and reviewed the Document, and when. This would apply to Documents such as reports, surveys, drawings, and other Documents that are revised and issued periodically or throughout the project or work. Metadata saved with electronic files can provide an audit trail for other types of Documents.

### 3.5.5 FILING DOCUMENTS

- 3.5.5.1 Standard File Structure
1. Creating a file structure that suits the type of work being undertaken, is simple to understand, and is standardized across the Professional Registrant's work will facilitate:
    - proper and correct filing of Documents;
    - consistency across the work;
    - efficient search and retrieval of Documents by those involved in the work and others who require them; and
    - smooth transition or transfer of files to new team members.

2. Engineers and Geoscientists BC recognizes that in some circumstances clients may impose file structures on projects that vary from those generally used by Professional Registrants.
3. Properly referencing hard copies of all Documents with the project or work name and number and filing them in chronological order will make Documents easier for others to retrieve. Using consistent file-naming formats that include project references for electronic files will allow for easier retrieval of electronic Documents.
4. Standard file structures and orderly filing will not make the transfer of responsibilities from one team member to another instantaneous. It will, however, allow a new person who may be unfamiliar with the project or work to readily retrieve the files, understand the decision-making, and assess the status of the project or work from a complete and orderly set of Records. That person may then begin to take over responsibilities with less risk of errors on important issues. The quality of Records should be such that another Professional Registrant referring to these files can fully recreate the requirements of the project or work, the professional engineering or professional geoscience processes that went into it, and the assumptions that led to the resulting product.

#### 3.5.5.2 Hard Copy versus Digital Filing

1. Documents may be filed and stored in hard copy format, digital format, or a combination of both. Engineers and Geoscientists BC will accept any of these options as satisfying the requirements of this Guide, as long as

Documents are shown to be present and can be readily retrieved by users.

2. If both formats are used, a cross-referencing system should be established so that users know which system contains the “originals” for each type of Document. A better solution may be to designate either the digital files or the hard copy files as the primary system containing the “original” versions of Documents. Professional Registrants must be confident that the designated or primary system includes a complete set of all Documents. This means ensuring that email Records related to a project are identified as such and filed in the primary project filing system. Documents in the non-designated or secondary system would be considered “convenience copies” that may be destroyed when no longer in use.
3. Preventing unauthorized access to files that contain personal or confidential information may assist Professional Registrants in meeting their obligations under privacy legislation and non-disclosure agreements.

### 3.5.6 ISSUING DOCUMENTS

- 3.5.6.1 Maintaining an audit trail indicating who received information and when will assist anyone picking up a new file and may make all the difference in being able to defend a claim. This can be accomplished by keeping a transmittal Record (form, email, or other) or using a system that prepares and logs transmittals.

### 3.5.7 ARCHIVING RECORDS

- 3.5.7.1 When archiving Records at the end of a project, or when the work they represent is no longer active, Professional Registrants must:
- be clear about what is and what is not a Record to retain;
  - cull files to remove Documents that have no continuing purpose or value and do not need to be retained;
  - group, label, and log project Records for easy search and retrieval; and
  - confirm that Records are trustworthy (authentic, reliable, correct, and complete; refer to [Section 3.3 What Makes a Good Professional Record](#) of this Guide for more information).

### 3.5.8 STORING RECORDS

- 3.5.8.1 Procedures for storing Records for the duration of their retention period must address:
- search and retrieval;
  - availability to those authorized to access them;
  - security and media that prevent Records from being altered;
  - environmental controls to preserve and prevent deterioration of the Records;
  - retaining older hardware and software to allow access to older media;
  - keeping a log of any lost or damaged Records; and
  - confidentiality and security requirements.

### 3.5.9 DESTROYING RECORDS

- 3.5.9.1 Before destroying Records:
- review and confirm that retention requirements have been met;
  - confirm that there is no longer any legal requirement prohibiting destruction; and
  - record what is destroyed and when.

# 4.0 REFERENCES AND RELATED DOCUMENTS

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