CONTROL OF RECORDS

1. GENERAL

1.1. Purpose

To establish the controls needed for identifying, archiving, storing and accessing the information contained in the various types of documents listed in this procedure.

1.2. Scope

This procedure applies to records and documents concerning the product and monitoring of the QMS. This procedure is based on the AS9100 standard which takes the regulatory requirements of PART/FAR, ISO 9001 into account. The method described in this procedure for controlling and retaining records applies to Safran Power Units San Diego and all approved sub-tier suppliers.

Section 3.0 lists the archiving rules for the various departments of the company, including documents that do not concern the product or the monitoring of the QMS. Each department must comply with the current regulations (for example, customs and legal requirements, etc.).

1.3. Definition

Digital Signature

Cryptographically generated data that identifies a document's signatory, with date and time. The result of which provides the services of original authentication, data integrity, and signer non-repudiation.

1.4. References

INS005 Safran USA Policy "Backup and Restore of Information"

GRP-0159 "Records and Archive Management"

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2. PROCEDURE

2.1. Identification

2.1.1. Records are uniquely numbered and are identifiable by recording characteristics such as:

- Customer Name/Number
- Product
- Report Number
- Date
- Serial Number
- Part Number
- Work Order Number
- Purchase Order Number

2.2. Types of Records to Retain and Archiving Periods

2.2.1. The examples listed in the following table are not to be considered a complete listing.

2.2.2. The periods indicated in the table below are minimum durations. Special customer requirements may apply through contracts or quality plans.

Type of record	Examples	Archiving period
Management review reports/records	Minutes of meetings, quality improvement plans, quality policy, evaluations	3 years [a]
Quality system documentation	Quality manual, work procedures and instructions, quality plans, internal audit schedules and NADCAP internal audit schedules	3 years [b]
Records of internal quality audits	Audit reports, corrective and preventive actions	7 years [a]
Commercial records	Contracts and contract amendments, subcontracting authorizations, approved offers, pricing, order forms	According to the contract

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Type of record	Examples	Archiving period
Design records and verifications	Design reference documents, Verification records, changes in design, justification for changes	Service life of the product + 3 years
Evaluation of subcontractors	Record of the evaluation, acceptable qualification of subcontractors, performance, changes in quality, verifications and follow-ups	5 years [a]
Documents that supply and demonstrate continuous identification and traceability of the product*	Traceability records, storage record, record of the identification of the serialization or batch numbers, record of suppliers, record of acceptance inspections	Service life of the product + 3 years
Records and data generated during the production phase *	Production order and records of performance testing.	Service life of the product + 3 years
Inspection and test records *	Sheets and records of inspections and tests, qualification records, record of first article inspections, delivery documentation	Service life of the product + 3 years
Control of records concerning inspection, measuring and testing equipment, including that which proves the conformity of a product *	Historical data on calibration / recalibration, approval records, calibration records, records on periodic inspection of tools, calibration certificate for standards, data sheets for measuring and testing equipment.	Service life of the product + 3 years
Non-conformity records *	All records such as: deviation/production authorizations, concession requests, records concerning the investigation and the analysis of the non-conformity data, with re-inspection	Service life of the product + 3 years

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Type of record	Examples	Archiving period
Corrective action records*	Corrective action reports, investigation data and reports on the causes of non-conformities, reports on the probability of non-conformities, records on the evaluation on the effectiveness of corrective actions	Service life of the product + 3 years
Personnel Records	Recruiting records, qualification validations, records of training, labor contract history, job description	1 year after employment stops
	Records of inspector stamps	YYY + 2 years
Records concerning the qualification of personnel *	List of qualified personnel , records concerning the qualification of personnel, including the detailed contents on their authorization	YYY + 2 years
Documents supporting the continuing airworthiness of the product *	Airworthiness release certificate	Service life of the product + 3 years
Documents supporting the maintaining of the airworthiness of the product Documentation concerning conformity *	Needs specifications, design data, concessions with limitations, product qualification/certification results, records of inspections of critical parts during the qualification/certification test, records of modifications, airworthiness directives, certification programmes and associated means, certifications	XXX + 3 years
Records concerning maintenance as well as all of the associated data needed to ensure continuing airworthiness for the product *	Repair solutions, technical publications (including successive revisions), records of the work performed, service bulletins, release documents concerning repair/maintenance, records of the names of maintenance personnel	XXX + 3 years

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Key:

a: starting on the date of issue or the recording of completion

b: starting on the date of cancellation/ deletion/replacement

XXX: when the product's type certificate has been withdrawn entirely and permanently or as agreed with the appropriate authority

YYY: until the person has ceased their work or their authorization is withdrawn

Records identified by « * » will be retained for 10 years from time of manufacture for all other parts except off-the-shelf / industry standard parts.

2.3. Archiving Conditions

2.3.1. Archiving conditions must be appropriate to the types of documents to be retained during the entire period defined in such a way that no alteration over time can occur and that the data remains legible during the entire archiving period specified.

2.3.2. Certain documents can be reproduced periodically such as computer files.

2.3.3. For long-term storage, it is permissible to retain only the listings in order to avoid creating discs, diskettes, etc. which could have difficulties being read for various reasons, (unless otherwise specified in the customer contract or purchase order)

2.3.4. Each department identifies their archive of documents/records and identification shall include: types of records/documents, date archived, archiving duration, method of classification (by document type, by system, by date and/or reference), and department ownership archiving conditions.

2.3.5. Electronic files requiring back-up should be stored on the shared server, which are backed up and archived nightly by IT in accordance with Safran USA Policy INS005. On a monthly basis, a full back-up tape is sent to third party off-site storage location for archive. The archival and retrieval of such tapes shall only be made by authorized individuals in order to protect the integrity and confidentiality of the data. The site shall maintain a current list of authorized individuals.

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2.4. Document Storage Methods

2.4.1. Storage

2.4.1.1. Records are stored as secured computer files or in designated filing cabinets to prevent deterioration and damage. Such records are easily accessible for use and are made available for review upon customer or audit request.

2.4.1.2. Hard copy records are stored where they are protected from physical deterioration, loss and damage due to environmental conditions.

2.4.1.3. Records must not be stored on personal storage drives or files and access to network drives are based on US person status and Program requirements.

2.4.2. Accessibility

The archiving conditions must allow for quick retrieval of the documents in order to respond within 24 hours to any requirement concerning information.

2.4.2.1. Each department that is responsible for data is also responsible for the archiving of its data, except for computer data which is the responsibility of the IT department.

2.4.2.2. The Maintenance department is responsible for availability and upkeep of the premises (locked premises, proper means of storage, fire safety and protection against the risks of various forms of destruction).

2.4.3. Document Elimination

2.4.3.1. At the end of the defined retention period for the archived document, the department that is responsible for the data will determine if the document is to be maintained in the archives or destroyed in accordance with established internal procedures, regulatory and customer requirements.

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2.4.3.2. When the documents are marked classified or secret, the destruction method must be in accordance with established procedures, legal guidelines and/or customer/regulatory requirements (shredding, for example). At a minimum, destruction should take place on Safran premises and not outsourced to a third party.

2.4.3.3. Documents scheduled for destruction that are stored offsite should first be brought back to Safran and destruction practices followed in accordance with internal procedures

2.4.3.4. Intellectual property, export controlled data and sensitive documents that are scheduled for destruction should be stored in locked recycle containers which are shredded by a third party on a monthly basis.

3. ARCHIVING PRACTICES

3.1. General Requirements

3.1.1. Each department (Sales & Contract Management, Customer Support, Production Flow Logistics & Management, Purchasing, Assembly/Tests, etc) is responsible for the management of its own archives.

3.1.2. Documents shall remain legible, readily identifiable and retrievable.

3.2. Operations

3.2.1. Documents are archived in paper format, or electronic for schedules and tool plans on a secure/controlled server.

3.2.2. Documents are archived in various locations assigned to the various departments.

3.2.3. The requirements for classifying documents differ according to the departments: by machine, year, supplier, reference.

3.2.4. Documents regarding tests of engines or equipment are maintained just after test by test technicians.

3.3. Purchasing

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3.3.1. The rules for archiving that apply are as follows:

Document family	Document title	Archiving rule
Call to tender and supplier choice	Supplier questionnaire (Opening request)	Supplier records– unlimited duration
	Qualification or withdrawal rate	Supplier records– unlimited duration
	Supplier evaluation questionnaire	Archived in a controlled server
	Supplier evaluation questionnaire, cont.	Archived in a controlled server
	RFI (pre-selection criteria)	In the joint archives.
	Sourcing tool (multi-criteria evaluation matrix)	In the joint archives
Contract	Contract review sheet before proposal to suppliers	In the joint archives
	Contract review sheet for signature	In the joint archives
	Contract	In the joint archives
	Confidentiality agreements	In the joint archives.
	Amendment to the confidentiality agreement	In the joint archives
Order	Purchase Order	1- Un-cleared Purchase Orders Supplier records at purchasing 2- Cleared Purchase Orders: year N and N+1: Supplier records at purchasing year N+2: at archives at purchasing From N+3 to N+10: in the joint archives
	Supplier receipt acknowledgement for a Purchase Order	With the Purchase Order either for: 1- Un-cleared Purchase Orders: Supplier records at purchasing 2- Cleared Purchase Orders: year N and N+1: Supplier dossier at purchasing year N+2: at archives at purchasing From N+3 to N+10: in the joint archives

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3.4. Quality Department

3.4.1. Documents are archived in paper format and electronically on a controlled/secure server.

3.4.2. Certain documents from the Special Processes and Quality Assurance department are stored on local premises. The other archived documents are grouped together by theme and then by year and stored by department.

3.4.3. Documents regarding assembly are stored by Quality inspectors just after the final inspection for each program.

3.5. Program and Technical Department

3.5.1. Documents are archived in paper format and electronically on a controlled/secure server. Nomenclatures are recorded in Lascom.

3.5.2. The principles for classifying documents differ according to the departments:

- by machine model and by date for the Technical Department.
- by year and by project for the technical markings
- by document type, by year or by reference for the other departments.

3.6. Each department is responsible for its archives, but access to the archive premises is controlled.

3.7. Repair

3.7.1. Commercial product records/documents are archived by the repair sales personnel.

3.7.2. Records/documents generated at receipt are archived by system by the operators who carry out identification upon receipt.

3.7.3. Inspection reports and penetrant method sheets are archived by the repair inspectors by system or by part reference

3.7.4. The remaining technical repair records and documentation is archived by the repair managers by customer.

3.8. General Services (Facilities)

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3.8.1. The rules for archiving documents concerning the Environment Management System are described in the related procedures.

3.9. HSE

3.9.1. Health, Safety and Environmental (HSE) Department

3.9.2. The archiving rules for HSE are defined in accordance with applicable regulatory/statutory requirements.

4. RESPONSIBILITY

4.1 The Quality Manager is responsible for the implementation and maintenance of this procedure.

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