



GELDARDS LLP - RETENTION SCHEDULE

Data protection retention schedule

Record Type	Retention Rule	Rationale
Accounts Payable (Purchase Orders, Purchase Invoices, Credit/Debit Notes, Goods Received Notes)	Financial Year Closed + 7 years	Statutory obligation to keep accounting records under the Companies Act 2006, Value Added Tax Act 1994, Value Added Tax Regulations 1995 and Finance Act 1998, SRA Accounts Rules 2011
Banking	Bank deposits, withdrawals, transfers, bank statements, balances, reconciliations = Financial Year Closed + 7 years Originals or copies of all authorities (other than cheques, for the withdrawal of money from a client account) & Paid cheques = Financial Year Closed + 2 years Paid cheques are retained by the Bank, = Financial year end +7 years	Statutory obligation to keep accounting records under the Companies Act 2006, Value Added Tax Act 1994, Value Added Tax Regulations 1995 and Finance Act 1998, SRA Accounts Rules 2011

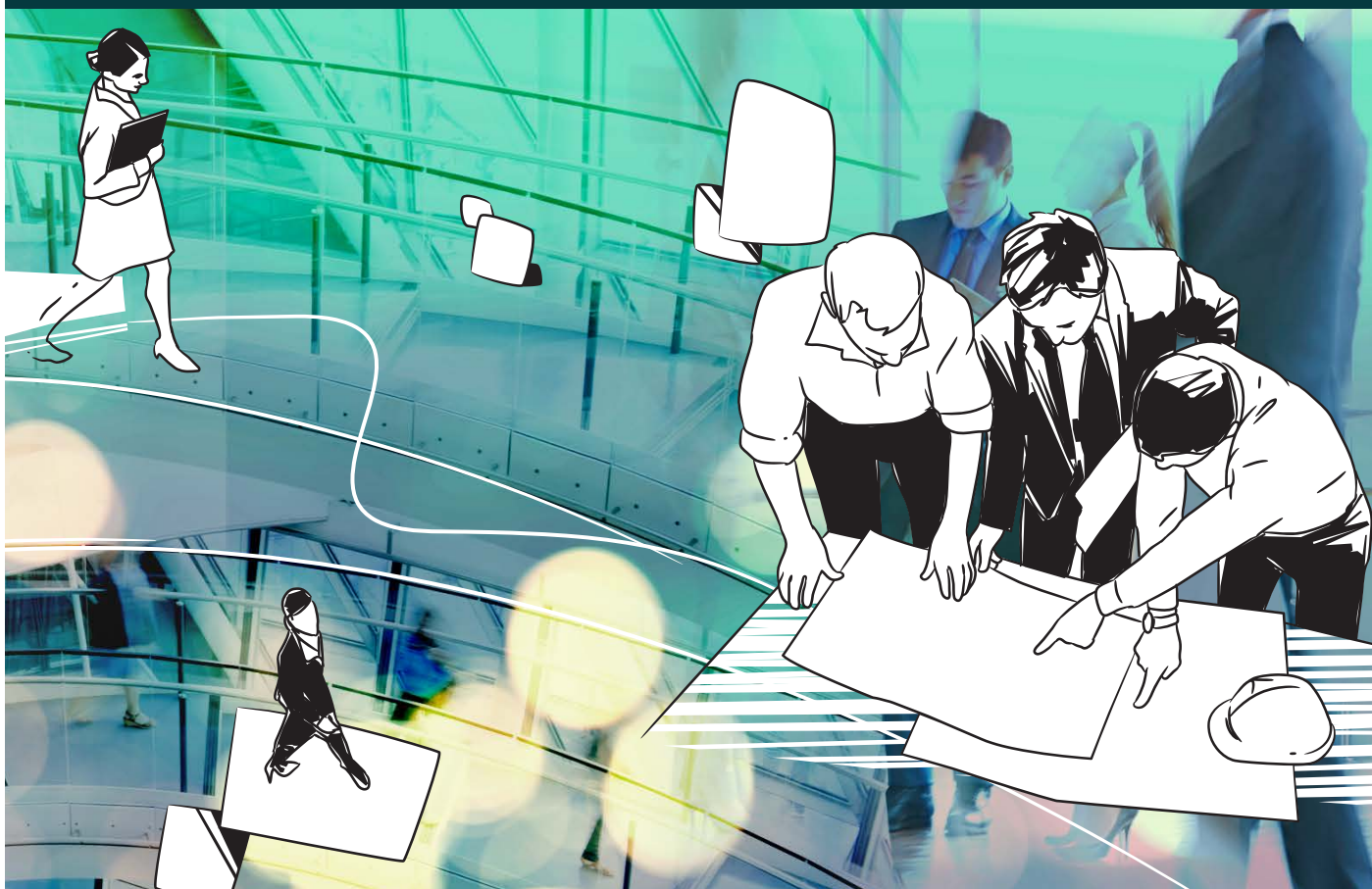
Record Type	Retention Rule	Rationale
	Client Care Files = File Closed + 3 years	
	Client General Files = File Closed + 6 years (15 years if includes property-related matters)	
	Establishment or administration of trusts, including probates creating a trust = Trust has ended + 7 years (with review date not more than 21 years ahead)	
Client & Matter Files (including: Client name and contact details (e.g. postal address, email address and telephone number(s)) Proof of identity Personal information provided (by the client or other Individuals whose personal information we obtain) that is relevant to the legal matter(s) the client has instructed us to advise upon. Such personal information may include special category personal information (including medical information). Client financial details (so far as relevant to their instructions) Copies of accounts forms	Grant of a lease or licence of property = Expiry of lease/licence/agreement + 7 years (with review date not more than 21 years ahead) Wills/LPA/EPA = Document date + shorter of 90 years or client's 100 th birthday Debt collection matters = File Closed + 6 years Abortive matters or no advice given = File Closed + 6 years All other matters = File Closed + 15 years Proof of ID files – 5 years from end of business relationship Original title deeds to freehold or long leasehold property, documents creating security over real property, share or other certificates over securities = Permanent Non-permanent Archive documents (where fixed or variable expiry dates) = 21 years then review if no fixed expiry date OR if fixed expiry date, Expiry + 7 years OR else 15 years for all other original documents	Based on their evidential value, aligning to time limits within the Limitation Act 1980.

Record Type	Retention Rule	Rationale
Client Matter Accounts and Time Recording data See also Matter and Client Files	Financial Year Closed + 7 years	Statutory obligation to keep accounting records under the Companies Act 2006, Value Added Tax Act 1994, Value Added Tax Regulations 1995 and Finance Act 1998, SRA Accounts Rules 2011
	Client Ledger accounts 6 years from date of last entry	
	For credit control purposes, collection and insolvency correspondence and case paperwork may need to be retained longer until the matter is resolved + 6 years	
	Credit card data must be deleted according to Payment Card Industry (PCI) standards and requirements Firm policy is not to record this data.	
Complaints (including personal information relating to any complaint, records and correspondence.)	End of Complaint / Settlement of Claim + 6 Years	Limitation Act 1980, c. 58, s. 5
Contracts and Agreements	Ordinary = Contract End + 6 years	Limitation Act 1980, c. 58, s. 5
	Deed = Contract End + 12 years	Limitation Act 1980, c. 58, s. 8
	Property Maintenance = Contract End + 15 years	Long stop for latent damage for actions relating to property, Limitation Act 1980, c. 58, s. 14B
Correspondence and Confirmations (Routine administrative correspondence and confirmations not related to projects, legal cases, contract or other important matters including: An individual's name and contact details (such as their telephone number or email address) and details of their enquiry/communication.	Current Year + 2 years	Reference

Record Type	Retention Rule	Rationale
Data Protection – Marketing Consents and individuals' information (including contact details, name of organisation and position, and delivery preferences) Requests for removal from marketing database	Kept until the individual withdraws consent	UK data protection law and rules relating to electronic direct marketing (i) require the retention of evidence of consent and (ii) permit the retention of contact details where consent to direct marketing has been provided by individuals ICO guidance recommends maintenance of a suppression list to evidence compliance with requests for removal from marketing database
Data Protection - Subject Access Requests and other requests for the exercise of data subject rights under data protection law	Conclusion of request + 6 year	Statutory limitation period
Data protection – internal record of data breaches/ notifications made to supervisory/regulatory bodies and/or data subjects	Records of data breaches – indefinitely pending clarification from the ICO Copies of notifications – 6 years	It is mandatory under the GDPR to keep a record of all data breaches. No guidance has yet been provided as to the retention period. Copies of records – retention period to align with the statutory limitation period.
Data protection – records relating to DPIAs/significant data protection decisions	Kept indefinitely as significant decisions must be kept under review	Such record keeping is a mandatory requirement of the GDPR
Email (All sent and received emails)	Retained and accessible for 15 years. Thereafter archived in the Firm's email archive system (Mimecast) but rendered inaccessible.	Based on their evidential value, aligning to time limits within the Limitation Act 1980.

Record Type	Retention Rule	Rationale
Expenses (including claims, authorisation and receipts, Travel and subsistence, Credit Card statements)	Financial Year Closed + 7 years	As part of financial audit trail
Accident records relating to Health & Safety (including records of any reportable injury, disease or dangerous occurrence under RIDDOR)	40 years	Protecting and evidencing the health and safety of both members of staff and the public, as recommended by the Health & Safety Executive.
Insurance - Claims (Correspondence, Court documents, Liability reports, Investigations, Medical reports, Photos, Quotes, Payments, Settlement documentation)	Claims = Settlement + 6 years Property-related = Settlement of Claim +15 years Incidents involving minor = Date of 18th Birthday + 3 years	Based on the standard limitation period for any legal action that may arise, treating insurance agreements as an ordinary contract under the Limitation Act 1980, c. 58, s. 5. 15 years long stop within the Limitation Act 1980 (c. 58, s. 14B) for latent damage for actions relating to property
Recruitment	Adverts = 10 years Authorisation = Vacancy Filled + 6 years Unsuccessful Applicants = filling of vacancy and notifying applicants + 12 months Successful Applicants = Transfer to Personnel file DBS (CRB) Checks = Recruitment decision + 6 months, then destroyed. Records documenting enquiries about vacancies and requests for application forms = Completion of recruitment process	Business need Evidence and limitation periods for legal action under the Equality Act 2010. The Home Office Code of Practice for Registered Persons and other recipients of Disclosure Information The Information Commissioner's Office, Employment Practices Code (data protection) A business need to retain details of unsuccessful applicants in case of a need to revisit the pool of original applicants at a future date e.g. if successful applicant fails probationary period, or another similar vacancy becomes available.

Record Type	Retention Rule	Rationale
Website (Technical information, including: Internet protocol address, Browser type and version, time zone setting and location, Browser plug in type and version, operating system and platform, Uniform Resource Locators ("URL"), Clickstream information to, through and from our website), form submissions, accessing other content (e.g. video content) and methods used to navigate away from the page	The retention period for this information is set out in our Cookies Policy which is available here: https://www.geldards.com/cookie-policy.aspx	Business need to monitor and analyse website usage in order to adapt and improve the web user's experience.
CCTV	Images are stored on a hard drive for 30 days for reference purposes. Where CCTV imagery is required in connection with a security incident, it is copied on to a disk and retained until the relevant incident has been dealt with (whether internally or externally by law enforcement agencies).	For security purposes.



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