

National Retention Policy for Local Authority Records 2023 - draft 8 approved by LGMA for use on 19th of July 2023

Functional Heading:		Information Technology		
Sub-Functions	Activities	Types of Documents	Retention Recommendation	Comments
Software Vendor management	Software design and implementation	Business requirements documentation; gap analysis; cost-benefit analysis; etc.	Retain for duration that software is being used by business units. Then when no longer operational or there is no longer any need to access historical data retained on that old system construct a high level description of the historical system and retain that description indefinitely. Then destroy all other records.	
	Software maintenance & support	Contracts for services; operating manuals; upgrades, etc.	Retain for duration that software is being used by business units. Then a further 7 years. Then destroy. Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	
	Request from Business Units for specific software package - determination on suitability by IT	Business requirements documentation; gap analysis; cost-benefit analysis; etc.	Retain until decision taken as to purchase and implement the specific software package. If decision is to purchase the those records are retained for the duration for which the software is in use. If decision is taken not to purchase specific software then retain for 2 years then destroy.	
	Issues and Updates	Contracts for services; operating manuals; upgrades, etc.	Retain for duration that software is being used by business units. Then a further 7 years. Then destroy. Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	

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	Procurement	Request for Tenders; marking schemes; competition records; tenders received; CE orders, contract, etc.	<p>a) Successful tender submissions including any pre-qualifying questionnaires - retain tender documentation supplied; tender competition documents; contract awards, Chief Exec orders, etc until contract covering supplies & services has been delivered in full + a further 7 years. Then offer to the archivist. Where no archivist then retain indefinitely</p> <p>(b) Unsuccessful tender submissions– retain for two years then destroy.</p>	
	Contracts	Contracts for services; correspondence, etc.	Retain for duration of the contract plus further 7 years. Then offer to the archivist. If no archivist see comment** Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Licences	Software License(s)	Retain the current license for its duration plus the lifetime of the next license if renewed. All previous historical licenses to be destroyed.	
Internal IT support	Network	Network Diagrams; IP Addresses; LAN; WiFi	Retain for duration that network is in operation. Then where the old network is redundant and no part of it is any longer (even as a fallback/failsafe) in use destroy after further two years. Where portions of the old network are still in use or retained as a duplicate/failsafe system retain those records for duration of their use.	
	Hardware	Requests; Orders; set ups	Retain for duration that hardware is in use. Then destroy after further 2 years.	

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	Purchase of hardware	POs, Invoices, contracts, etc.	Retain up to equipment is delivered plus a further 7 years. Then destroy subject to exceptions (i.e.) where a legal case arises following a contract dispute or where EU funding is involved (see comments).	<i>Exceptions being where (i) where a legal case has been initiated. In these instances records should be retained until the legal process has been exhausted; and (ii) where capital is provided from EU funds. There is an absolute legal requirement to retain all relevant documentation relating to EU funding for a minimum period of 3 yrs. after the closure of the Operational Programme under which the funding was provided and letter issued by EU Court of Auditors to that effect. EU funded schemes to be retained to comply with EU fund requirements (i.e.) Article 140 of REGULATION (EU) No 1303/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. For EU structural funds NB: as per Article 15(2) of EU Reg No 480/2014 The retention period for EU audit purposes is 30 yrs. EU retains the right to audit within that period. If audited a letter issued by the EU Court of auditors signifies the end of the audit process.</i>
	Security	Firewall; Security Systems;	Retain for duration that security arrangements are in operation. Then retain indefinitely in long term storage high level details of previous and historical security arrangements (but not archived).	
	Access & ID	Register of access rights issued to each staff member	Retain details of levels of access issued to each staff member for duration that the access is required for work purposes*. If software system doesn't already retain a historical record of who had access to which system at a given point in time retain outside of system a high level description of which staff member had access to systems and any restriction applying to them at a given point in time.	<i>* Personal data of employees may be collected and processed in these activities. This may include the personal data of staff who have left employment of the LA.</i>

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	Virtual Environment		Retain for duration that virtual environment is in operation. Then retain indefinitely in long term storage (but not archived)	
	Support to staff on specific software packages	Requests for assistance; issues logs and tracking IDs; correspondence between staff and Internal IT support.	Retain details of supports provided to staff on specific software packages for duration that software is being used by business units*. Then identify significant support issues (if any); anonymise the records and retain indefinitely (not in archive).	<i>* Personal data of employees may be collected and processed in these activities. This may include the personal data of staff who have left employment of the LA.</i>
	Wireless Area Network	WiFi Network Diagrams; access password;	Retain for duration that Wireless Area network is in operation. Then retain high level network details indefinitely in long term storage (but not archived).	
Intranet	Technical Install and Configuration	Metadata	Retain for duration that the Intranet is in use. Then retain indefinitely high level details of historical intranet in long term storage (but not archived).	
	Customisation	Correspondence with intranet software provider; agreements re localised changes to intranet software	Retain records of customisation/configuration carried out on bespoke intranet system for duration that intranet system is in use. Then retain indefinitely in long term storage (but not archived).	
	Design and Structure	Intranet Design documents; diagrams; and operating manuals	Retain for duration that intranet software is in use. When replaced retain high level details of superseded intranet indefinitely in long term storage (but not archived).	
	Reports	Usage; analysis of quantities of documents being stored; levels of activity; monitoring stats (e.g.) sharegate	Retain for duration that intranet software/system is in use. When system replaced destroy documents.	
	Wikis	Shortened Process Manual(s) for a specific operational function	Retain for duration for which Wiki is update. Then destroy superseded version.	
	Team Reviews	Reviews into usage by specific business teams/units	Retain for duration that intranet software/system is in use. When system replaced destroy documents.	

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	Metadata	Can be (i) metadata for specific document; (ii) metadata for the intranet software system	(i) Retained for duration that document is existence; (ii) Retain for duration that intranet software is in use. When replaced retain high level details of superseded intranet indefinitely in long term storage (but not archived).	
	System Audits	Monitoring of auditing reports detailing intranet usage	Retain for duration that intranet software/system is in use. When replaced retain high level details of superseded intranet indefinitely in long term storage (but not archived).	
	Issues & Updates	Staff requests; correspondence with staff; correspondence with intranet service provider; new functions design	Retain records of issues raised and solutions for duration that intranet system/software is in use. Then a further 7 years. Then destroy. Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	
Public Access IT support	Design and Implementation	Bespoke software for various service functions (e.g.) Planning; Motor Tax, etc. Operating manuals, etc	Retain for duration for which software system is in use plus 7 years. Then destroy. Exception being the need to retain a high level description of public facing software system used in the past along with details/specifications of its functionality. These should be offered to the archivist. Where no archivist see comment**	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Issues and Updates	Requests/notifications from members of the public; correspondence with members of the public; correspondence with public access service provider; new functions design	Retain records of issues raised for duration that intranet system/software is in use*. Then a further 7 years. Then destroy. Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	* <i>Personal data of employees may be collected and processed in these activities. This may include the personal data of staff who have left employment of the LA.</i>

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	Security	Firewall; Security Systems;	Retain for duration that security arrangements are in operation. Then retain indefinitely in long term storage high level details of previous and historical security arrangements (but not archived).	
Web Services	Web service design	Vsphere; backup architecture; switches; SAN	Retain for duration that web services is used by the LA or individual business units. Then when no longer operational construct a high level description of the historical web site and supporting architecture and retain that description indefinitely. Then destroy all other records.	
	Web services support	Requests for support; Correspondence; details of solutions/fixes applied, etc.	Retain details of supports provided to business units on specific supports provided for web pages for the duration that the specific web services design is being used by business units*. Then identify significant support issues (if any); anonymise the records and retain indefinitely (not in archive).	<i>* Personal data of employees may be collected and processed in these activities. This may include the personal data of staff who have left employment of the LA.</i>
Digital Storage	Standards: International; national and local	ISOs (see comments); Digital Preservation Coalition handbook;	Retain details of the standard being applied plus any locally adapted variations until it is superseded. Then offer to the archivist. If no archivist see comment**	ISO19165-1:2018 Preservation of digital data and metadata; ISO 14641-1:2018 Electronic document management; ISO 14721/OAIS Open Archival Information System; ISO 27040:2015 Information Technology – security techniques – storage security ** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>

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	Servers	Details of physical servers and/or cloud based server(s) being used	Retain for duration that servers are in operation. Then when servers are replaced and no part of the server (even as a fallback/failsafe) in use then destroy records of old servers after further two years. Exception being reports detailing a catastrophic server failure which caused data loss. These should be retained indefinitely.	
	Formats	(i) Investigation and reports on storage formats; (ii) metadata for formats in use; (iii) details of any bespoke formats used so as to facilitate future access	(i) Retain until decision taken as to purchase and implement the specific storage formats package. If decision is taken not to purchase a specific storage format then retain for 2 years then destroy. If decision is to purchase a specific storage format then those records (ii) & (iii) are retained indefinitely so as to facilitate access to records in older/bespoke format.	
	WebArchiving	Periodic snapshot/copies of Council's web sites	Take periodic snapshots/copies and offer to the archivist. Where no archivist then retain indefinitely **	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Obsolescence	Plans for obsolete software and hardware systems. Audit of users of older system due to become obsolete; Plans for transfer of records held on old system to new system	Retain records of plans to move to new system until older system has been successfully replaced. Retain records of plans indefinitely post migration	

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	Migration	Migration reports on moving data to new formats; Fixity and checksum reports	Retain records of migration until migration has been successfully achieved + 2 years. Then offer to the archivist. Where no archivist then retain indefinitely **	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Third Party Storage Agreements	Storage Agreements with 3rd Parties	Retain contract/agreement with 3rd party storage provider until contract/agreement expires or is superseded. Then retain for a further 7 years. Then destroy. Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	
	Checksums	Automated report system run to check data integrity/loss (outside pf migration)	Offer to the archivist. Where no archivist then retain indefinitely **	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Back ups	Incremental Daily backup's, Differential weekly and full monthly back ups.	Incremental daily back ups are over written weekly. Monthly backup's retained for 12 months. Then destroy.	
Geographic Information Systems	Technical Instructions	Instructions to system users on (e.g.) Data Mangement, location naming and numbering	Retain for duration for which software system is in use plus 7 years. Then destroy	

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	Projects; National; Regional & Local	GIS data map; records detailing when additional layers of data or data sets were added to the GIS map	GIS data maps are maintained indefinitely. Record detailing when additional layers were added to be retained indefinitely. Where functionality permits then a time specific snapshot of the GIS data map should be taken periodically and then offered to the archivist or permanently stored if no archivist**	GIS data is stored on the LA's GIS system in map format with layers. GIS data maps are not deleted but are constantly updated with new location data plus additional data layers added over time. Where the GIS format doesn't allow for time specific snapshots of a LA GIS system to be taken then a version/copy of GIS data map cleansed of all personal data and where no ability to make further changes to the data is permitted should be developed for making available for research by members of the public.
	National Procedures	Guidelines and instructions issued in relation boundary crossing GIS maps. National standards for data capture and data mapping	Retain for duration that documents are valid (i.e.) until superseded by newer versions. Then offer to the archivist. If no archivist then see comment**	
	User Groups	Meetings of GIS users group; local; regional or national	Retain for two years. Then destroy	
	Third Party GIS and/or mapping Data: Geo Directory; ESB; Bord Gáis; Irish Water; OSI	Agreements and Licences	Retain the current license for its duration plus the lifetime of the next license if renewed. All previous historical licenses to be destroyed.	
	Standards: International; national and local	ISO 19115-1:2014 Geographic Information – Metadata Part 1: Fundamentals ISO 19115-2:2019 Geographic Information – Metadata Part 2: Extensions for Acquisition and processing; European Standard in INSPIRE- EU Directive	Retain details of the standard being applied plus any locally adapted variations until it is superseded. Then offer to the archivist. If no archivist see comment**	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Third Party GIS and/or mapping Data: Configuration;	Strategy, National Mapping Agreements; Manuals	Retain for duration that documents are valid (i.e.) until superseded by newer versions. Then offer to the archivist. If no archivist then see comment**	

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National Broadband Plan	Service Level Agreement (SLA) with DoRCD	SLA	Retain the current SLA for its duration plus the lifetime of the next SLA if renewed. Then offer to the archivist. If no archivist then see comment**	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Correspondence and records of meetings with DoRCD; NBI; local Retail Service Provider (RSP) appointed by DoRCD and with representatives of community based or privatey owned Broadband connection point (BCP)		Retain for duraton for which the BCP project is operation plus any audit period required by the Govt department through which the European Investment bank funding was sought and provided.	NBP is EU funded so EU funded schemes should be retained to comply with EU fund requirements (i.e.) Article 140 of REGULATION (EU) No 1303/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. There is an absolute legal requirement to retain all relevant documentation relating to EU funding for a minimum period of 3 years after the closure of the Operational Programme under which the funding was provided and letter issued by EU Court of Auditors to that effect.
	Financial records relating to BCP operations	(i) Grants sought and paid for by DoRCD; (ii) Payments made by LA to the RSP on behalf of relevant BCPs	Retain for duration of the BCP project is in operation plus further 7 years. Then offer to the archivist. If no archivist see comment** Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>

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	BCP infrastructure & Hardware installation	BCP connection is point to point. Microwave Dish (Point to Point). Wireless Access Wi-Fi Antennas & associated control box.	Retain records of installation and support for the duration of the BCP project + 7 years. Then offer to the archivist.If no archivist see comment** Exception being where a legal case has been initiated on foot of a contract dispute. In these instances records should be retained until the legal process has been exhausted.	NBP is EU funded so EU funded schemes should be retained to comply with EU fund requirements (i.e.) Article 140 of REGULATION (EU) No 1303/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. There is an absolute legal requirement to retain all relevant documentation relating to EU funding for a minimum period of 3 years after the closure of the Operational Programme under which the funding was provided and letter issued by EU Court of Auditors to that effect.
Smart City	Smart Cities Forum	Meetings and correspondence with other Smart Cities	Retain for duration for which the Smart Cities project is in operation. Smart Cities projects are subject EU funding audit requirements (see comments). Then offer to archivist.If no archivist see comment**	National Planning Framework (NPF); Ireland 2040 Our Plan: Issues and Choices. Smart Cities are EU funded so EU funded schemes should be retained to comply with EU fund requirements (i.e.) Article 140 of REGULATION (EU) No 1303/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. There is an absolute legal requirement to retain all relevant documentation relating to EU funding for a minimum period of 3 years after the closure of the Operational Programme under which the funding was provided and letter issued by EU Court of Auditors to that effect.
	Smart Cities Projects/Initiatives undertaken by other Cities	Details of of projects and initiatives undertaken by Smart Cities	Retain for duration for which the Smart Cities project is in operation. Then offer to archivist. If no archivist see comment**	National Planning Framework (NPF); Ireland 2040 Our Plan: Issues and Choices ** In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.

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	Smart City project/initiatives undertaken locally	Details of of projects and initiatives undertaken by own Smart City team	Retain for duration for which the Smart Cities project is in operation. Then offer to archivist. If no archivist see comment**	National Planning Framework (NPF); Ireland 2040 Our Plan: Issues and Choices. ** In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.
Continuous Improvement	Workshops		Retain records of workshops held for 2 years. Then destroy	
	Toolkits		Retain for duration that toolkit is in use. When superseded or no longer used retain for a further 2 years then destroy.	
	Revision to Standard Operating Procedures		Retain newly revised SOP and superseded SOP until next revision. Old SOP then to be offered to archivist. Then offer to the archivist. If no archivist see comment**	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Projects	Continuous improvement projects carried out on hardware or software systems or on IT business processes	Retain project records for duration of project plus 2 years. Take a high level description of project(s) and offer to archivist. If no archivist see comment** Other records to be destroyed.	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>

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	Innovation Week	Presentations; handbooks, etc.	Retain records of Innovation week events for 2 years after end of calendar year in which annual event took place. Then destroy	
Data Officer	Open Data - Re-Use of Public Sector information. Publication of data held by LA	Each LA to appoint a Open Data Liaison Officer whose role will be to identify certain high value datasets which will be made available by public bodies and public undertakings free of charge, in machine readable format, be accessible via APIs, provided as a bulk download (where relevant) and be free to re-use by the public.	LA website to identify datasets that are available for download. Take periodic snapshots/copies and offer to the archivist. Where no archivist then retain indefinitely **	EU Directive 2019/1024 - Open Data and re-use of Public Sector Information, known as the Open Data Directive, transposed by Regulations SI 376/2021 ** In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records
	Re-use of Public sector information - request from public for data not already published	Records of requests received from members of the public and the records of the responses to request issued by the LA.	Retain copies of requests including records released for 5 years. Retain sufficient high level description of each request received and responded to. Then destroy all other documents including copies of docs released. Periodically offer high level list to archivist. If no archivist please see comment**	** <i>In the event of no archivist then the records should be retained indefinitely or until they can be appraised at a future date for their archival value by an archivist either employed directly or otherwise engaged by the Local Authority. The archivist either employed directly or otherwise engaged by the Local Authority is to notify senior manager/certifying officer in business section before taking any decision other than to permanently archive records.</i>
	Sharing of data with other Public Service Bodies	Correspondence with other public bodies; DGU; data sharing agreements	Retain high level record of data sets shared with other LAs and sectoral bodies. Retain any data sharing agreements (DSA) entered into with other Public Service Bodies for the duration of the data sharing. Retain older superseded DSAs along with current DSA.	Public Service Data Strategy; Data Sharing & Governance Act, 2019. Data Officers appointed in each LA to proactively identify predominantly non-personal datasets that can be and will be shared with other LAs and sectoral bodies. Records generated will be datasets themselves and where required due to the sharing of personal data a data sharing agreement will be drafted and put in place.

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	Transfer/sharing of data with other public bodies.	Technical requirements (e.g.) ISOs; digital object identifiers; encryption tools and standards; transfer mechanism and security measures	Retain technical specifications for the period for which technical solution is in place. Once technical solution supersedes retain a high level description indefinitely.	Public Service Data Strategy; EU Directive 2019/1024 - Open Data and re-use of Public Sector Information, known as the Open Data Directive, transposed by Regulations SI 376/2021
E-mail storage	Retention of e-mails related to business transactions	Individual e-mails held by staff members on their PC and portable devices.	E-mails related to specific transactions and business activities are subject to the retention periods recommended for those transactions and business activities and do not have a separate retention period.	E-mails that relate to specific transactions and business activities should be stored within the files for those transactions and activities rather than retained in a separate file. This will facilitate period cleansing of non-essential and non-work related e-mails. Each business unit is responsible for ensuring its staff adhere to the retention periods set out for business/transaction related e-mails. All the other revised record retention schedules will be revised to include the agreed e-mail retention recommendations and that email retention should be the responsibility of all business units and not just the ICT section.

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	E-mail retention on storage systems & back ups	E-mail storage systems and back ups.	Once e-mails related to specific business transactions have been stored and retained in the relevant file storage for that transacton/activity then unattached e-mails can be permanently deleted/destroyed from e-mail storage systems on an initially 7 year basis. This retention period will reduce to 3 years following the initial 7 year period. Please see comment****	LAs that use File Management/Business Enterprise Systems that support the transfer and storage of e-mails from Outlook to their system can adopt the retention recommendation listed here. However, for those LAs that do not use a File Management/Business Enterprise Systems that supports the transfer and storage of e-mails from Outlook and use a separate e-mail storage system, they should apply the recommended retention periods for each busines activity to the e-mails stored on that seperate storage system. ****It is recognised that there is a need for transitional period of 7 years so as to allow staff in business units to commence the identification of busienss related e-mails and seperation/deletion of no-business related e-mails. It is recognised that this will be labour intensive hence a phased approach of 6 + 1 years to begin with. The aim ultimately though is to reduce the retention period to 3 years after the 7 year transitional phase.