

Client Assets

Schedule 1 Record keeping requirements

Sch 1.1 G

The aim of the guidance in the following table is to give the reader a quick overall view of the relevant record keeping requirements.

Sch 1.2 G

It is not a complete statement of those requirements and should not be relied on as if it were.

Sch 1.3 G

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 1A.3.3 R	Allocation of the CASS oversight responsibilities in CASS 1A.3.1 R, of the CASS <i>operational oversight function</i> , or of the responsibilities in CASS 1A.3.1CR (2), as relevant	The <i>person</i> to whom the CASS oversight responsibilities have been allocated, subject to the provisions of CASS 1A.3.3 R, to whom the CASS <i>operational oversight function</i> has been allocated in accordance with CASS 1A.3.1A R, or to whom the responsibilities in CASS 1A.3.1CR (2) have been allocated	Upon allocation	5 years (from the date the record was made)
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Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 5.1.1 R (4)	Record of election of compliance with specified CASS rules	Record of compliance with specified CASS rules	Not specified	Not specified
CASS 5.2.3 R (2)	Holding <i>client money</i> as agent	The terms of the agreement	Not specified	Six years
CASS 5.4.4 R (2)	Adequacy of systems and controls	Written confirmation of adequate systems and controls from its auditor	Not specified	Not specified
CASS 5.5.84 R	<i>Client money</i> calculation	Whether the <i>firm</i> calculates its <i>client money</i> requirements according to CASS 5.5.84 R or CASS 5.5.84 R	Not specified	Not specified
CASS 5.5.84 R	Transactions and commitments for <i>client money</i>	Explanation of the <i>firm's</i> transactions and commitments for <i>client money</i>	Not specified	Three years
CASS 5.8.3 R (1)	Client's title to a <i>contract of insurance</i>	Identity of such <i>documents</i> and/or property and dates received and delivered to <i>client</i>	Not specified	Three years
CASS 6.1.6BR (3)	Written agreement regarding any arrangement relating to a <i>TTCA</i>	The agreement	When agreement made	From the date the agreement is entered into and until five years after the agreement is terminated
CASS 6.1.8AR(1) and (2)	<i>Client's</i> communication to <i>firm</i> of wish to terminate <i>TTCA</i>	<i>Client's</i> communication of wish to terminate <i>TTCA</i>	When communication made	Five years (from date of communication)

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 6.1.8AR (4)	<i>Firm's response to client's wish to terminate TTCA</i>	<i>Firm's response to client's wish to terminate TTCA</i>	When notification given	Five years (from date of communication)
CASS 6.1.12R(5)	<i>Firm's segregation of money as client money under this rule</i>	Description of <i>safe custody asset</i> in question, identity of relevant <i>client</i> , amount of <i>money</i> segregated	Maintain up to date	Not specified (see default provision CASS 6.6.7R)
CASS 6.1.12E R	<i>Client's agreement to firm's use of exemption in CASS 6.1.12 R</i>	<i>Client's written agreement</i>	At the time of <i>client's</i> agreement	During the time the <i>firm</i> makes use or intends to make use of the exemption in CASS 6.1.12 R in respect of that <i>client's safe custody assets</i>
CASS 6.1.16CR (3)	<i>A personal investment firm that temporarily holds a client's designated investments which is not in the course of MiFID business</i>	Client details and any actions taken by the firm		5 years (from the making of the record)
CASS 6.1.16K R	Client custody assets which the firm has arranged for another to hold or receive	Full details	On receipt	5 years
				[deleted]
CASS 6.2.15 R	<i>Safe custody assets divested by the firm under CASS 6.2.10 R</i>	Details of asset divested, relevant documentation and the <i>firm's</i> attempts to contact the <i>client</i> concerned	When asset divested	Indefinite
CASS 6.3.2AR (1)	Appropriateness of a <i>firm's</i> selection of a third party	Grounds upon which a <i>firm</i> satisfies itself as to the appropriateness of the <i>firm's</i> selection of a third party to hold <i>safe custody assets</i> belonging to <i>clients</i>	Date of the selection	5 years (from the date the <i>firm</i> ceases to use the third party to hold <i>safe custody assets</i> belonging to <i>clients</i>)
CASS 6.3.2AR (2)	A <i>firm's</i> periodic review into the selection and appointment of a	Date of review, actions taken by the <i>firm</i> in reviewing the selection and	On the date of the review	Five years (from the date the <i>firm</i> ceases to use the third

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
	third party under CASS 6.3.1 R	appointment of a third party under CASS 6.3.1 R, and grounds upon which the <i>firm</i> continues to be satisfied of appropriateness of its selection of that third party to hold <i>safe custody assets</i> belonging to <i>clients</i>		party to hold <i>safe custody assets</i> belonging to <i>clients</i>)
CASS 6.3.6AR(2)	Granting of security interests, liens or rights of set-off	Recording of the granting of security interests, liens or rights of set-off in the <i>firm's</i> books and records	On the <i>firm's</i> granting, or where the <i>firm</i> has been informed of the granting	Not specified (see default provision CASS 6.6.7R)
CASS 6.4.3 R	Details of <i>clients</i> and <i>safe custody assets</i> used for the <i>firm's</i> own account or the account of another <i>client</i> of the <i>firm</i>	Details of the <i>client</i> on whose instructions the use of the <i>safe custody assets</i> has been effected and the number of <i>safe custody assets</i> used belonging to each <i>client</i>	Maintain up to date records	Not specified (see default provision CASS 6.6.7R)
CASS 6.6.2 R	<i>Safe custody assets</i> held for each <i>client</i> and the <i>firm's</i> own <i>applicable assets</i>	All that is necessary to enable the <i>firm</i> to distinguish <i>safe custody assets</i> held for one <i>client</i> from <i>safe custody assets</i> held for any other <i>client</i> , and from the <i>firm's</i> own <i>applicable assets</i>	Maintain up to date records	Not specified (see default provision CASS 6.6.7R)
CASS 6.6.3 R	<i>Safe custody assets</i> held for <i>clients</i>	Accurate records which ensure their correspondence to the <i>safe custody assets</i> held for <i>clients</i>	Maintain up to date records	Not specified (see default provision CASS 6.6.7R)
CASS 6.5.2A R				[deleted]
CASS 6.5.3 R				[deleted]
CASS 6.6.4 R	<i>Client specific safe custody asset record</i>	<i>Client specific safe custody asset record</i>	Maintain up to date	Not specified (see default provision CASS 6.6.7R)
CASS 6.6.6R	<i>Client</i> agreements that in	A copy of every executed <i>client</i>	Not specified	Not specified (see default pro-

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
	clude a <i>firm's</i> right to use <i>safe custody assets</i> for its own account	agreement that includes a <i>firm's</i> right to use <i>safe custody assets</i> for its own account		vision CASS 6.6.7R)
CASS 6.6.7R	Default record keeping provisions for CASS 6	Refer to the rule concerned	Refer to the rule concerned	Five years from the later of: (1) the date it was created; and (2) if it has been modified since the date in (1), the date it was most recently modified
CASS 6.6.8 R	<i>Internal custody record checks, physical asset reconciliations and external custody reconciliations</i> carried out by the <i>firm</i> .	Date and actions the <i>firm</i> took when carrying out the relevant process; a list of the discrepancies the <i>firm</i> identified and the actions the <i>firm</i> took to resolve those discrepancies	Immediate	Not specified (see default provision CASS 6.6.7 R)
CASS 6.6.16 R	<i>Aggregate safe custody asset record</i>	All the <i>safe custody assets</i> the <i>firm</i> holds for its <i>clients</i> , including those deposited with third parties under CASS 6.3 and any <i>physical safe custody assets</i>	Maintain up to date if the <i>firm</i> wishes to use the <i>internal custody reconciliation method</i>	Not specified (see default provision CASS 6.6.7 R)
CASS 6.6.30 R	<i>Rolling stock method for physical asset reconciliations</i>	<i>Firm's</i> reasons for concluding that this method is adequately designed to mitigate risk of records being manipulated or falsified	Before using this method	Five years (from the date the <i>firm</i> ceases to use this method)
CASS 6.6.45 R	Frequency of the <i>firm's internal custody record checks, physical asset reconciliations and external custody reconciliations</i>	Sufficient to show and explain decision taken under CASS 6.6.44 R when determining frequency	Immediate	(1) Subject to (2), indefinitely. (2) For any decision which is superseded by a subsequent decision, five years from the subsequent

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
				decision (with (1) applying to the subsequent decision).
CASS 6.6.46R (2)	Review of frequency if the <i>firm's internal custody record checks, physical asset reconciliations</i> and <i>external custody reconciliations</i>	Date of each review and the actions the <i>firm</i> took in reviewing the frequency at which it conducts the relevant process	Immediate	Not specified (see default provision CASS 6.6.7 R)
CASS 6.6.54R (2)(a)	Actions taken by the <i>firm</i> to resolve <i>shortfall</i> under this rule	Actions taken, description of <i>shortfall</i> , identity of affected <i>client(s)</i> , applicable <i>assets</i> appropriated to cover the <i>shortfall</i> . Update when discrepancy resolved.	Maintain up to date	Not specified (see default provision CASS 6.6.7 R)
CASS 6.6.54R (2)(b)	Actions taken by the <i>firm</i> to resolve <i>shortfall</i> under this rule	Actions taken, description of <i>shortfall</i> , identity of affected <i>client(s)</i> , amount of <i>money</i> appropriated to cover the <i>shortfall</i> . Update when discrepancy resolved.	Maintain up to date	Not specified (see default provision CASS 6.6.7 R)
CASS 6.7.6R	Any <i>safe custody asset</i> disposed of in accordance with CASS 6.7.2R	(i) The <i>safe custody asset</i> that was disposed of; (ii) the value of the consideration received for the <i>safe custody asset</i> disposed of; (iii) the name and contact details of the <i>client</i> to whom the <i>safe custody asset</i> was allocated, according to the <i>firm's</i> records at the time of making the record; and (iv) efforts applied by the <i>firm</i> to determine the <i>client's</i> correct contact details	At the time of the disposal	Indefinite

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
		under CASS 6.7.4E(1)(a) or, if being relied on, for the purposes of CASS 6.2.10R(4).		
CASS 7.10.3R(3)	Record of election to comply with the <i>client money chapter</i>	Record of election to comply with the <i>client money chapter</i> , including the date from which the election is to be effective	Date of the election	5 years (from the date the <i>firm</i> ceases to use the election)
CASS 7.10.31 R	Record of election in relation to CASS 7.10.30R	Record of election in relation to CASS 7.10.30R	Date of election	Not specified (see default provision CASS 7.15.5R(3))
CASS 7.10.35 R	<i>Trustee firm's</i> election to comply, or to cease to comply, with specific CASS 7 provisions	Relevant provisions, date of election and of any decision to cease to comply	When election made or decision taken to cease to comply	5 years after ceasing to use the election
CASS 7.10.38 R	<i>Trustee firm's</i> election to comply, or to cease to comply, with specific CASS 7 provisions	Relevant provisions, date of election and of any decision to cease to comply	When election made or decision taken to cease to comply	5 years after ceasing to use the election
CASS 7.11.3R(3)	Written agreement regarding any arrangement relating to a <i>TTCA</i>	The agreement	When agreement made	From the date the agreement is entered into and until five years after the agreement is terminated
CASS 7.11.20R	<i>Client's</i> agreement to <i>firm's</i> use of exemption in CASS 7.11.14R	<i>Client's</i> written agreement	At the time of <i>client's</i> agreement	During the time the <i>firm</i> makes use or intends to make use of the exemption in CASS 7.11.14R in respect of that <i>client's</i> monies
CASS 7.11.24R	<i>Client's</i> agreement to <i>firm's</i> use of the delivery versus payment exemption in CASS 7.11.21R	<i>Client's</i> written agreement	At the time of <i>client's</i> agreement	During the time the <i>firm</i> makes use, or intends to make use, of the exemption in CASS 7.11.21R in respect of that <i>client's</i> monies
CASS 7.11.55 R	<i>Client money</i> paid to charity by the <i>firm</i> un-	Details of balances released, relevant docu-	When balance released	Indefinite

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
	der CASS 7.11.50R(4)	mentation and the <i>firm's</i> attempts to contact the <i>client</i> concerned		
CASS 7.11.57R(4)	<i>Client money</i> paid to charity by the <i>firm</i> under this rule	Records of all balances released from <i>client bank accounts</i> , including the information in CASS 7.11.55R(1)(a) and CASS 7.11.55R(1)(b)	When balance released	Not specified (see default provision CASS 7.15.5R(3))
CASS 7.13.14BR	The <i>firm's</i> written policy produced under CASS 7.13.14AR(1)(a) in respect of the <i>firm's</i> use of <i>client bank accounts</i> under CASS 7.13.13R(3A)(b), and subsequent versions of it	(i) For each of the <i>firm's</i> business lines, the maximum proportion of the <i>client money</i> held by the <i>firm</i> under CASS 7.13.3R(1) to (3) in respect of the business line that the <i>firm</i> considers would be appropriate to hold in such accounts; (ii) the <i>firm's</i> rationale for reaching its conclusion(s) under (i); and (iii) the means by which the <i>firm</i> will comply with CASS 7.13.14AR(2)(a), having regard to CASS 7.13.14CE.	On the date it creates the version of the policy	Five years after the earlier of: (1) the date on which the version of the policy was superseded; and (2) the date on which the <i>firm</i> ceased to use <i>client bank accounts</i> under CASS 7.13.13R(3A)(b).
CASS 7.13.25R(1)	Appropriateness of a <i>firm's</i> selection of a third party	Grounds upon which a <i>firm</i> satisfies itself as to the appropriateness of the <i>firm's</i> selection of a third party to hold <i>client money</i>	Date of the selection	5 years (from the <i>firm</i> ceases to use the third party to hold <i>client money</i>)
CASS 7.13.32R(3)	Physical receipts	Physical receipt of <i>money</i>	When the <i>firm</i> receives <i>client money</i> in the form of cash, a cheque or other payable order	Not specified (see default provision CASS 7.15.5R(3))

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 7.13.33R(3)	Future dated cheque	Receipt of <i>money</i>	When the <i>firm</i> receives <i>client money</i> in the form of a cheque that is dated with a future date	Not specified (see default provision CASS 7.15.5R(3))
CASS 7.13.55R	<i>Firm's</i> adoption of the alternative approach	Reasons for concluding that the normal approach would lead to greater risk to <i>client money</i> , adopting the alternative approach would not result in undue risk to <i>client money</i> , the alternative approach is appropriate for use by the particular business line, and the <i>firm</i> has adequate systems and controls	Before adopting alternative approach	Five years after it ceases to use the alternative approach in connection with that business line
CASS 7.4.19A R to CASS 7.4.19C R				[deleted]
CASS 7.15.2 R	<i>Client money</i> held for each client and the <i>firm's</i> own money	All that is necessary to enable the <i>firm</i> to distinguish <i>client money</i> held for one <i>client</i> from <i>client money</i> held for any other <i>client</i> , and from the <i>firm's</i> own money	Maintain up to date records	Five years (from the date the record was made)
CASS 7.15.3 R	<i>Client money</i> held for each <i>client</i>	Accurate records to ensure the correspondence between the records and accounts of the entitlement of each <i>client</i> for whom the <i>firm</i> holds <i>client money</i> with the records and accounts of the <i>client money</i> the <i>firm</i> holds in <i>client bank accounts</i> and <i>client transaction accounts</i>	Maintain up to date records	Five years (from the date the record was made)

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 7.15.5R(3)	Default record keeping provision for CASS 7	Refer to the rule concerned	Refer to the rule concerned	Five years from the later of: (1) the date it was created; and (2) if it has been modified since the date in (1), the date it was most recently modified
CASS 7.15.18R	Internal reconciliation of <i>client</i> money balances	The <i>firm's</i> reasons for concluding that the method of <i>internal client money reconciliation</i> it proposes to use meets the criteria at CASS 7.15.18R(1)(a)	Before the <i>firm</i> uses a <i>non-standard method of internal client money reconciliation</i> or materially changes its method	Not specified (see default provision CASS 7.15.5R(3))
CASS 7.18.10R(1)	<i>Acknowledgment letters</i>	Countersigned <i>acknowledgment letter</i>	From date of receipt	5 years from closure of last account to which the <i>acknowledgment letter</i> relates
CASS 7.18.10R(2)	<i>Acknowledgment letters</i>	Copy of <i>acknowledgment letter</i> sent to <i>authorised central counterparty</i> under CASS 7.8.3R (1)	From date <i>firm</i> sends the letter	5 years from closure of last account to which the <i>acknowledgment letter</i> relates
CASS 7.18.11R	<i>Acknowledgment letters</i>	Any other documentation or evidence the <i>firm</i> believes necessary to demonstrate compliance with CASS 7.8	None specified	None specified (see default provision CASS 7.6.4 R)
CASS 7.10.7ER	The election made under CASS 7.10.7AR	The election including the date from which the election is to be effective and, if the <i>firm</i> cancels the election, the date from which the election is to cease to be effective	At the time of the election and, if the <i>firm</i> cancels the election, at the time it is cancelled	Five years after ceasing to use the election
CASS 7.11.9R (2)	<i>Client's</i> communication to <i>firm</i> of wish to terminate TTCA	<i>Client's</i> communication of wish to terminate TTCA	When communication made	Five years (from date of communication)

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 7.11.9R (4)	<i>Firm's</i> response to <i>client's</i> wish to terminate TTCA	<i>Firm's</i> response to <i>client's</i> wish to terminate TTCA	When notification given	Five years (from date of notification)
CASS 7.11.20 R				[deleted]
CASS 7.11.24 R				[deleted]
CASS 7.13.25R (2)	<i>Firm's</i> periodic review into selection and appointment of third party under CASS 7.13.8 R.	Date of each review, actions the <i>firm</i> took in reviewing the selection and appointment of a third party under CASS 7.13.8 R, and the grounds upon which the <i>firm</i> continues to be satisfied of appropriateness of its selection of that third party to hold <i>client</i> money	Date of review	Five years (from date of review)
CASS 7.13.25R (3)	<i>Firm's</i> periodic review under CASS 7.13.22 R.	Fact of review, its considerations and conclusions	Date of review	Five years (from date of review)
CASS 7.13.36 R	Unallocated <i>client</i> money	Fact that the balance treated as unallocated <i>client</i> money	When <i>firm</i> is unable to immediately identify <i>money</i> as <i>client</i> money or its own <i>money</i> and it treats the balance as <i>client</i> money	Pending <i>firm's</i> allocation of the <i>client</i> money concerned to an individual <i>client</i>
CASS 7.13.50 R; CASS 7.13.51 R	Prudent segregation record	Details of <i>money</i> segregated under CASS 7.13.41 R required by these rules	Maintain up to date	Five years (after the <i>firm</i> ceases to retain <i>money</i> as <i>client</i> money under CASS 7.13.41 R)
CASS 7.13.66 R; CASS 7.13.67 R	<i>Alternative approach mandatory prudent segregation record</i>	Details of <i>money</i> segregated under CASS 7.13.65 R required by these rules	Maintain up to date	Five years (after the <i>firm</i> ceases to retain <i>money</i> as <i>client</i> money under CASS 7.13.65 R)
CASS 7.13.74 R; CASS 7.13.75 R	<i>Clearing arrangement mandatory prudent segregation record</i>	Details of <i>money</i> segregated under CASS 7.13.73R (3)(a) required by these rules	Maintain up to date	Five years (after the <i>firm</i> ceases to retain <i>money</i> as <i>client</i> money under CASS 7.13.73R (3)(a))

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CASS 7.15.5R (1)	Total amount of <i>client money</i> the <i>firm</i> should be holding for each <i>client</i>	Total amount of <i>client money</i> the <i>firm</i> should be holding for each <i>client</i>	Maintain up to date	Not specified (see default provision CASS 7.15.5R (3))
CASS 7.15.5R (2)	Transactions and commitments for <i>client money</i>	Sufficient to show and explain transactions and commitments	Maintain up to date	Not specified (see default provision CASS 7.15.5R (3))
CASS 7.15.7 R	<i>Internal client money reconciliations</i> and <i>external client money reconciliations</i> conducted carried out by the <i>firm</i>	Date, actions the <i>firm</i> took in carrying out the relevant process, and the outcome of its calculation of its <i>client money requirement</i> and <i>client money resource</i> Fact of each reconciliation and review of the <i>firm's</i> arrangements for complying with CASS 7.15.5 R to CASS 7.15.7 R	Immediate	Not specified (see default provision CASS 7.15.5R (3))
CASS 7.15.9 R	Receipts of client money	Appropriate to account for all receipts of <i>client money</i> in the form of cash, cheque or other payable order not yet deposited in a <i>client bank account</i>	Maintain up to date	Not specified (see default provision CASS 7.15.5R(3))
CASS 7.15.24 R	Frequency of the <i>firm's external client money reconciliations</i>	Sufficient to show and explain decision taken under CASS 7.15.23 R when determining frequency	Immediate	(1) Subject to (2), indefinitely. (2) For any decision which is superseded by a subsequent decision, five years from the subsequent decision (with (1) applying to the subsequent decision).
CASS 7.15.26R (2)	Review of frequency of the <i>firm's external client money reconciliations</i>	Date of each review and the actions the <i>firm</i> took in reviewing the frequency at which it carries out the <i>external</i>	Not specified	Not specified (see default provision CASS 7.15.5R (3))

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
		<i>client money reconciliations</i>		
CASS 7.19.6 R	For each <i>sub-pool</i> established by the <i>firm</i>	All the <i>client</i> beneficiaries of that <i>sub-pool</i>	From the date on which the <i>sub-pool</i> is created	Five years following the date on which <i>client money</i> was last held by the <i>firm</i> in relation to the <i>sub-pool</i> to which the record applied
CASS 7.19.7 R	For each <i>sub-pool</i> established by the <i>firm</i>	(a) The name of the <i>sub-pool</i> (b) The identity of the <i>net margined omnibus account</i> to which the <i>sub-pool</i> relates; (c) Each <i>client bank account</i> and each <i>client transaction account</i> maintained for the <i>sub-pool</i> ; (d) the applicable <i>sub-pool disclosure document</i> for the <i>sub-pool</i> .	Prior to the date on which the <i>firm</i> intends to receive or hold <i>client money</i> for that <i>sub-pool</i>	Five years following the date on which <i>client money</i> was last held by the <i>firm</i> in relation to the <i>sub-pool</i> to which the record applied
CASS 7.19.8 R	For each <i>sub-pool</i> established by the <i>firm</i>	A list of all the <i>sub-pools</i> the <i>firm</i> has created.	From the date on which the <i>sub-pool</i> is created	Five years following the date on which <i>client money</i> was last held by the <i>firm</i> in relation to the <i>sub-pool</i> to which the record applied
CASS 7.19.9 R	For each <i>sub-pool</i> established by the <i>firm</i>	A <i>sub-pool disclosure document</i>	At the time of establishing the relevant <i>sub-pool</i>	Five years following the date on which <i>client money</i> was last held by the <i>firm</i> in relation to the <i>sub-pool</i> to which the <i>sub-pool disclosure document</i> applied
CASS 7.19.13R (2)	For each <i>sub-pool</i> established by the <i>firm</i>	The name of each <i>client bank account</i> and each <i>client transaction account</i> maintained for the	From the date on which the <i>client bank account</i> and <i>client transaction account</i> is	5 years following the date on which <i>client money</i> was last held by the <i>firm</i> in relation to

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
		<i>sub-pool</i> , including a unique identifying reference	maintained for the <i>sub-pool</i>	the <i>sub-pool</i> to which the record applied
CASS 7A.2.6FR	Any balance under CASS 7A.2.6AR(1)(b)(i) or (ii) which has been applied towards any costs incurred in accordance with CASS 7.17.2R or towards any <i>shortfall</i> in the relevant notional <i>pool</i> in accordance with CASS 7A.2.6AR(1)(b) or (c) respectively	(i) The amount of the balance of <i>client money</i> ; (ii) the name and contact details of any <i>client</i> to whom that balance was allocated according to the <i>firm's</i> records at the time of making the record; and (iii) efforts applied by the <i>firm</i> to determine the <i>client's</i> correct contact details under CASS 7A.2.6CE(1)(a) or, if being relied on, for the purposes of CASS 7.11.50R(3).	Immediately before taking steps to apply the balance towards costs or a <i>shortfall</i> in accordance with CASS 7A.2.6AR(1)(b) or (c) respectively	Indefinite
CASS 7A.3.8R (3)	<i>Client money shortfall</i>	Each <i>client's</i> entitlement to <i>client money shortfall</i> at the failed bank	Maintain up to date records	Until <i>client</i> is repaid
CASS 7A.3.10R (3)	<i>Client money shortfall</i>	Each <i>client's</i> entitlement to <i>client money shortfall</i> at the failed bank	Maintain up to date records	Until <i>client</i> is repaid
CASS 7A.3.11R (3)	<i>Client money shortfall</i>	Each <i>client's</i> entitlement to <i>client money shortfall</i> at the failed bank	Maintain up to date records	Until <i>client</i> is repaid
CASS 7A.3.17R (3)	<i>Client money shortfall</i>	Each <i>client's</i> entitlement to <i>client money shortfall</i> at the failed intermediate broker, <i>settlement agent</i> or OTC counterparty	Maintain up to date records	Until <i>client</i> is repaid
CASS 8.3.1 R	Adequate records and internal controls in respect of the <i>firm's</i> use of <i>mandates</i> (see	Up to date list of <i>firm's mandates</i> and any conditions regarding the use of <i>mandates</i> , all transac-	Maintain current full details	One year after the <i>firm</i> ceases to have the <i>mandate</i> or, if the <i>mandate</i> was held in the

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
	CASS 8.3.2 R to CASS 8.3.2C R)	tions entered into, details of procedures and <i>internal controls</i> for giving and receiving of instructions under <i>mandates</i> , and important <i>client</i> documents held by the <i>firm</i> , and, in relation to non-written mandates, the further details required by CASS 8.3.2C R		course of or in connection with the <i>firm's MiFID business</i> , five years after the same date
CASS 10.1.3 R	A <i>firm's CASS resolution pack</i>	The documents to which CASS 10.2 and CASS 10.3 refer	From the date on which a <i>firm</i> becomes subject to CASS 10.1.3 R	None is specified
CASS 11.3.6 R	Allocation of CASS oversight function in CASS 11.3.1 R or CASS 11.3.2 R, or CASS <i>operational oversight function</i> in CASS 11.3.4 R	The <i>person</i> to whom (as applicable) the CASS oversight responsibilities have been allocated, or to whom the <i>CASS operational oversight function</i> has been allocated	Upon allocation	5 years (from the date the record was made)
CASS 11.7.6 R	Appropriateness of a CASS <i>large debt management firm's</i> selection of an <i>approved bank</i>	Grounds upon which a CASS <i>large debt management firm</i> satisfies itself as to the appropriateness of the <i>firm's</i> selection of an <i>approved bank</i> at which to hold <i>client money</i>	Date of the selection	5 years (from the date the <i>firm</i> ceases to use the <i>approved bank</i> to hold <i>client money</i>)
CASS 11.8.8 R	<i>Client bank account acknowledgement letters</i> sent in accordance with CASS 11.8.2 R	Each counter-signed <i>client bank account acknowledgement letters</i> received	On receipt of each letter	5 years (following closure of the last <i>client bank account</i> to which the letter relates)
CASS 11.8.9 R	Demonstration that a CASS <i>debt management firm</i> has complied with CASS 11.8.2 R to CASS 11.8.7 R	Evidence of such compliance	On compliance with the relevant provision	None specified

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 11.9.5 R	Money received from <i>clients</i> in the form of cash, cheques or other payable orders	Details of money received	On receipt	None specified
CASS 11.9.8 R (2)	Unidentified <i>client</i> money under CASS 11.9.8 R (2)	Details of unidentified <i>client</i> money held	Being unable to identify <i>money</i> as <i>client</i> money or its own <i>money</i> , and deciding it is reasonably prudent to so record	Until it performs the necessary steps to identify the <i>money</i> under CASS 11.9.8 R (1)
CASS 11.11.1 R	<i>Client</i> money held for each <i>client</i> and the CASS debt management firm's own money	All that is necessary to enable the CASS debt management firm to distinguish <i>client</i> money held for one <i>client</i> from <i>client</i> money held for any other <i>client</i> , and from the firm's own money	Maintain up-to-date records	None is specified
CASS 11.11.3 R	<i>Client</i> money held for each <i>client</i>	Accurate records to ensure the correspondence between the records and accounts of the entitlement of each <i>client</i> for whom the CASS debt management firm holds <i>client</i> money with the records and accounts of the <i>client</i> money the firm holds in <i>client</i> bank accounts	Maintain up-to-date records	None is specified
CASS 11.11.4 R	Payments made to, for or on behalf of clients by a CASS debt management firm and written and oral contact with <i>clients</i> and creditors	Details of payments made and of the written or oral contact	Maintain up-to-date records	None is specified

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
CASS 11.12.4 R	A CASS <i>debt management firm's</i> CASS 11 resolution pack	The documents to which CASS 11.12.3 R and CASS 11.12.4 R refer.	From the date on which a CASS <i>debt management firm</i> becomes subject to CASS 11.12.3 R	None is specified
CASS 11.13.12 R (3)	A CASS <i>large debt management firm's</i> record of each <i>client's</i> shortfall in the event of a <i>secondary pooling event</i>	Details of the shortfall	On the secondary pooling event occurring	None is specified
CASS 13.2.3R	Allocation of oversight function in CASS 13.2.3R	The person to whom the oversight function is allocated	Upon allocation	5 years (from the date the record was made)
CASS 13.5.8R	<i>Client bank account acknowledgement letters</i> sent in accordance with CASS 13.5.2R	Each counter-signed <i>client bank account acknowledgement letter</i> received	On receipt of each letter	5 years (following closure of the last client bank account to which the letter relates)
CASS 13.5.9R	Demonstration that the <i>firm</i> has complied with the requirements of CASS 13.5	Evidence of such compliance	On compliance with the relevant provision	None specified
CASS 13.6.5R	<i>Money</i> received from <i>customers</i> in the form of cash, cheques or other payable orders	Details of money received	On receipt	None specified
CASS 13.6.6R(2)	Unidentified <i>client money</i> under CASS 13.6.6R(2)	Details of unidentified <i>client money</i> held	Being unable to identify <i>money</i> as <i>client money</i> or its own <i>money</i> , and deciding it is reasonably prudent to so record	Until it performs the necessary steps to identify the <i>money</i> under CASS 13.6.6R(1)
CASS 13.10.1R(1)	<i>Client money</i> held for each <i>customer</i> and the <i>firm's</i> own <i>money</i>	All that is necessary to enable the <i>firm</i> to distinguish <i>client money</i> held for one <i>customer</i> from <i>client money</i> held for any other <i>customer</i> and from	Maintain up-to-date records	None specified

Handbook reference	Subject of record	Contents of record	When record must be made	Retention period
		the <i>firm's own money</i>		
CASS 13.10.3R	<i>Client money held for each customer</i>	Accurate records to ensure the correspondence between the records and accounts of the entitlement of each <i>customer</i> for whom the <i>firm</i> holds <i>client money</i> with the records and accounts of the <i>client money</i> the <i>firm</i> holds in <i>client bank accounts</i>	Maintain up-to-date records	None is specified
CASS 13.10.4R	Payments made to, for or on behalf of <i>customers</i> by the <i>firm</i>	Details of payments made	Maintain up-to-date records	None is specified
CASS 13.11.13R	A record of each <i>customer's</i> shortfall in the event of a <i>secondary pooling event</i>	Details of the shortfall	On the secondary pooling event occurring	None is specified