

SCHEDULE 2 – Appendix 14

Data Retention

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1 Overview

1.1.1 This document sets out the retention periods for Data processed by the Service Provider for the Congestion Charging Scheme and other Schemes. This is primarily focussed on Data that refers to individuals but also includes types of Data that do not comprise of Personal Data.

1.1.2 It is important to note that retention periods set out in this document reflect current requirements which may be subject to change.

1.1.3 In the event of a dispute, Data must be maintained for as long as necessary to support the dispute process. A dispute may include, but not be limited to:

- Representation;
- Appeal;
- Customer Complaint;
- a complaint to the Ombudsman; or
- any other court or legal proceedings.

2 Electronic Records

2.1 Images

Data Item	Retention Period	Description
#1 Image of capture event – Charge	48 hours.	All Images of Vehicles shall be deleted after forty eight (48) hours unless subject to other retention requirements detailed in this appendix.

Data Item	Retention Period	Description
<p>#2 Image of capture event for Vehicles registered for Account payment</p>	<p>24 hours following payment for Post Pay.</p> <p>24 hours following the statement date plus dispute representation period sixty (60) days for other Accounts.</p>	<p>Images that have been matched to an active Account shall be deleted within twenty four (2)4 hours of payment being made and the period for the Customer being able to dispute the Charge.</p> <p>If there is a disputed charge then all Images for the statement or Charge being questioned shall be retained until the dispute has been closed.</p> <p>For Post Pay Accounts the Customer will be deemed to have accepted a Charge if he/she makes payment. For other Accounts Customers will be deemed to have accepted the charge once the period for raising any representation following issue of a statement has expired.</p>
<p>#3 Image of capture event - Exempt</p>	<p>24 hours.</p>	<p>Images that have been matched to a VRM identified as Exempt from all Schemes in force at the time and point of capture.</p>
<p>#4 Image of capture event – Contraventions</p>	<p>13 Months.</p>	<p>Images retained to support a PCN shall be deleted thirteen (13) Months after closure of the PCN (e.g. Appeal, cancellation and TfL write-off).</p>
<p>#5 VoSI Images and associated audit Data</p>	<p>1 Month after VRM end date for VoSI entry.</p>	<p>VoSI Images, where there is no associated Penalty Charge, shall be deleted following one (1) Month after the end date of VoSI entry for a VRM.</p> <p>The maximum period for VoSI monitoring is six (6) Months. Retention shall be for a maximum of seven (7) Months.</p>

Data Item	Retention Period	Description
#6 Media from mobile patrol units	7 days	This information shall be retained as part of the ER and should be deleted seven (7) days from successful load of disk.
#7 Evidential Record Deletion Log	4 weeks	This information shall be retained for four (4) weeks from the creation of the log entry.
#8 ER audit trail	--	Once ER becomes Contravention Candidate any modification or activity shall be audited. (i.e. if record is viewed, PCN issued, printed etc.). This information should be retained in line with the Image retention policy (e.g. #4).
#9 NRS status log	2 weeks	
#10 SR Session Log	13 Months following PCN close	

2.2 Core IT System

Data Item	Retention Period	Description
DVLA Green List	As per DVLA supply	The Green List shall be retained until refreshed by later copy of the reference Data in line with the Data supply from the DVLA.
DVLA batch Data (from WEE batch / SFT)	1 Month	All DVLA responses shall be recorded against a Penalty Charge once it has been confirmed. However the process of confirmation can take up to one (1) Month depending on the response from the DVLA

Data Item	Retention Period	Description
Audit log of WEE online access to DVLA Data	24 Months	DVLA WEE access shall be retained for a period of twenty four (24) Months for audit purposes in line with DVLA requirements.
DVLA test Data	Only as long as necessary for Testing purposes	DVLA test Data

2.3 Enforcement

Data Item	Retention Period	Description
PCN Data Including specific Vehicle Data, Registered Keeper/Person Liable Data, incoming correspondence and outbound Fulfilment (including but not limited to Representations, Appeals, Statutory Declarations, Enquiries and Complaints, call recordings and PCN payment details relating to individual PCN)	6 + 1 years	This Data is required to enable any investigation into the PCN history and retrieval of relevant documents.
Statutory Declarations scanned correspondence image	6 + 1 years	This Data is required to enable any investigation into the PCN history and retrieval of relevant documents.

Representation & Appeals scanned correspondence image	6 + 1 years	This Data is required to enable any investigation into the PCN history and retrieval of relevant documents.
PE Data	Until no longer a PE	Once a Registered Keeper/Person Liable no longer meets the criteria of a PE the record should be removed. Only the record that the Registered Keeper/Person Liable was a PE shall be removed at this point – the source PCNs will not change and historical Data will not be retained to state that the Registered Keeper/Person Liable was formerly a PE.
Enforcement documents – Scan failures	33 Months	Scanned documents which are deemed unsuccessfully scanned shall be removed from short term storage and retained as per unscanned documents for a period of thirty three (33) Months.
Enforcement documents – Scanned	3 Months	Once document has been scanned the hard copy shall be retained for this period to ensure that the scanned copy is legible.

2.4 Customer Sales & Discounts

Data Item	Retention Period	Description
Customer Data – Standard Registered Customer	24 Months	Customer Data shall be deleted twenty four (24) Months following the end of the validity of the last Charge Payment. Following expiry of retention period, all remaining Customer Data will be deleted.
Customer Data – Incomplete and unused Standard Registered Customer	24 Months	Incomplete and unused Customer registrations and Customers with no Charge Payment activity shall be deleted twenty four (24) Months after the initial registration date.

Data Item	Retention Period	Description
Customer Data – Discounted Customer	40 Months	<p>Registered Discount Customer Data shall be deleted forty (40) Months from the date of award/rejection of the Discount (whether a first time, a renewal or inactive).</p> <p>For Blue Badge Discounts, this shall be forty (40) Months from each annual event – which may be a full registration (first time or renewal) or an affirmation (and to be retained whether the Discount is awarded or rejected, the same as the other Discounts).</p>
Customer Data – Incomplete Discounted Customer	40 Months	Incomplete Customer registrations shall be deleted forty (40) Months after the initial registration date.
Customer Data – Anonymous Customer	Varies	Anonymous Customers created when an interaction occurs (Enquiry, anonymous hardcopy Receipt request, Complaint). This Data should be deleted in line with the Data retention period of the associated transaction.
Charge Payments	24 Months	Charge Payment details shall be deleted twenty four (24) Months following the end of the validity of the Charge Payment.
General Customer scanned correspondence	12 Months	Scanned images produced from scanning an item of general correspondence (Enquiry or Complaint) shall be deleted twelve (12) Months from the date of resolution.

Data Item	Retention Period	Description
Scanned copies of Discount application forms & supporting Documentation	40 Months	<p>Registered Discount Customer Data shall be deleted forty (40) Months from the date of award/rejection of the Discount (whether a first time, a renewal or inactive).</p> <p>For Blue Badge Discounts, this shall be forty (40) Months from each annual event – which may be a full Registration (first time or renewal) or an affirmation (and to be retained whether the Discount is awarded or rejected, the same as the other Discounts).</p>
Subject Access Request Data	6 Months	SARs shall be deleted six (6) Months following closure of the SAR process or the rejection of a SAR.
Decommissioned TAG linked to VRM	12 Months	Once a Tag is returned due to it being faulty, the information linking it to the VRM shall be retained for twelve (12) Months, for historical purposes.
TAG linked to VRM with no activity	24 Months	The link is removed when the Customer has their Account removed.

2.5 Organisational Data

Data Item	Retention Period	Description
Additions of Vehicles to Organisation lists	60 days	VRM additions to the Organisation VRM list shall be deleted sixty (60) days after the VRM has been deleted from the System.
Additions of ad-hoc Vehicles to Organisation and all Vehicle usage	60 days	Ad-hoc VRM Charge Payment additions to the Organisation VRM list and usage shall be deleted sixty (60) days after the successful payment of the Monthly Account following the ad-hoc VRM Customer defined end date.
Removal of Vehicles from Organisation	60 days	Customer deletion requests from the Organisation VRM list shall be deleted sixty (60) days after the successful payment of the Monthly Account. Or 60 days after an Account is forcibly closed by TfL.
Organisational financial account Data	6+1 years	This detailed Organisational finance Data is required to support financial audit analysis as only summary Data is retained by the finance application.

Data Item	Retention Period	Description
Organisational Account Data	All Data should be retained for 13 Months following payment / write- off and summary Data be retained indefinitely regardless of closure reason	Organisational Data shall be retained for thirteen (13) Months following Account closure where Account closed has not been instigated by TfL (e.g. fraud).

Data Item	Retention Period	Description
Incomplete Organisational Account Data	All Data should be retained for 13 Months following payment / write-off and summary Data be retained indefinitely regardless of closure reason	Organisations who fail to complete Registration shall be removed thirteen (13) Months after the initial date of application.

Data Item	Retention Period	Description
Fraudulent activity on TfL closed Accounts	All Data should be retained for 13 Months following payment / write-off and summary Data be retained indefinitely regardless of closure reason	<p>Accounts which are forcibly closed by TfL due to fraudulent activity shall be retained indefinitely.</p> <p>Summary information only – Organisation operator name and a summary of the closing position. Note: this is actual fraudulent activity, and not just suspected.</p> <p>The contact details retained for this purpose shall be those of the Organisation not the individual employees. TfL also requires retention of the name and job title (but not contact details) of the person who was the applicable Relationship Manager at the time the Organisation Account was closed, as a point of reference.</p>

Data Item	Retention Period	Description
Outstanding debt on closed Accounts	All Data should be retained for 13 Months following payment / write-off and summary Data to be retained indefinitely regardless of closure reason	All Data, including financial and VRM usage should be retained thirteen (13) Months following payment or TfL write-off.
Organisation Fulfilment	13 Months.	Organisation Fulfilment shall be retained as long as the Organisation Account is open and active, once closed this Data shall be retained for a further thirteen (13) Months (e.g. Organisation statements, which can be viewed by the Organisation as long as the Account is open).

Data Item	Retention Period	Description
Correspondence including registration applications	13 Months	Organisation correspondence shall be retained as long as the Organisation Account is open and active, once closed this Data should be retained for a further thirteen (13) Months.

2.6 Finance (Accounting)

Data Item	Retention Period	Description
Current individual financial transactions	18 Months from transaction date.	This Data will be retained online within the System. A Monthly process shall archive this Data following the eighteen (18) Month period.
Archived individual financial transactions	6 + 1 years	This Data shall be retained off-line on tape to ensure that financial Data is retained for a total of six plus one (6+1) years.
Accounts detailed journals	6 + 1 years	This summary Data shall be retained for six plus one (6+1) years for audit purposes.
Chargebacks	6 + 1 years	This summary Data shall be retained for six plus one (6+1) years for audit purposes.

2.7 Management Information

Data Item	Retention Period	Description
Detailed MIS Data	24 Months	After twenty four (24) Months, the detailed MIS Data will be summarised. The MIS workgroups will define how this will work in practice for each Data category.
Summarised MIS Data	6+1 years	Data shall be retained for six plus one (6+1) years once transferred to MIS.

2.8 Miscellaneous

Data Item	Retention Period	Description
Fulfilment documents	13 Months	Unless otherwise specified Fulfilment documents shall be retained thirteen (13) Months from the date of creation.
Fulfilment XML for SPSL	12 Months	This shall be retained for twelve (12) Months from the date of creation.
Scanned Images	13 Months	Unless otherwise specified, scanned document images should be retained for thirteen (13) Months from the scan date.

2.9 System Operations

Data Item	Retention Period	Description
Call Centre call recordings	90 days	Contact Centre records

Audit of user password resets	12 Months	Audit of User password resets shall be retained for twelve (12) Months from creation.
User Audit log Data	12 Months	Sign-on and Sign-off, transactions shall be retained for twelve (12) Months from creation.
Security Log Data.	12 Months	Retained for twelve (12) Months from creation.
CCTV recordings of post opening and scanning	6 Months	Retained for six (6) Months following recording.
Backup Tapes	Overwritten at the end of an 8 week cycle	
Subject Access Request Data	6 Months	Following completion of a request.
Interface Log Data	24 Months	Following event.

3 Physical Records

This includes multimedia records ranging from hardcopy documents to System backup tapes.

3.1 Image

Data Item	Retention Period	Description
Changes in Image System components.	5 years	This is a hardcopy log of new releases of Hardware, underlying operating Systems or application Software components.

3.2 Enforcement

Data Item	Retention Period	Description
Enforcement documents - Unscanned	33 Months	
Enforcement documents – Scan failures	33 Months	Retained for thirty three (33) Months.
Enforcement documents – Scanned	3 Months	Scanned and retained for three (3) Months.
PCN related correspondence – Hard copies	30 Working Days	Secure and accessible storage required until destruction. Thirty (30) Working Days following receipt as long as successfully scanned. If not successfully scanned within thirty (30) Working Days, then hard copy must be retained until successfully scanned.

3.3 Customer Sales & Discounts

Data Item	Retention Period	Description
Discount application forms and evidence – Hard copy	30 days	Documents shall be retained for a period of thirty (30) days following the scan date.
Standard Registration forms and evidence – Hard copy	30 days	Documents shall be retained for a period of thirty (30) days following the scan date.

3.4 Organisation Data

Data Item	Retention Period	Description
Organisation set-up Documentation (e.g. Registration forms etc).	Rule driven	For the life of the Account until closure completed, and then for a further six (6) Months. For forced closure by TfL fifteen (15) Months.

3.5 Finance (accounting)

Data Item	Retention Period	Description
Payment related correspondence – hard copies	30 days	From scan date.
Accounts journals	6 + 1 years	From scan date.

3.6 Management Information

None

3.7 Miscellaneous

Data Item	Retention Period	Description
General correspondence – hard copy	30 days	General correspondence including Enquires and Complaints shall be retained for a thirty (30) days period once the document has been scanned.
Data from other agencies	7 days	This shall be retained for seven (7) days after being loaded/ applied to the system.

PMA documents	N/A	Retention of hardcopy PMA documents which are scanned into the system by the Service Provider are the responsibility of TfL and are not governed by this policy.
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3.8 System Operations

Data Item	Retention Period	Description
Backup Tapes	8 weeks	Overwritten at end of eight (8) week cycle.
Retail transaction log	365 days	Data relating to this information will not be needed in excess of one hundred and thirty (130) days and any Data which if over one hundred and seventy five (175) days old shall be purged from the System.
Blue Badge nominations	175 days	Blue Badge nominations shall be retained for one hundred and seventy five (175) days from nomination date.
IVR shopping basket	7 days	This table holds session information for all interaction over IVR which has been dropped out, and these records are not valid after a day.
Super NRS	6 Months	The Contravention Data and SNRS statistics shall be stored in separate tables for the SNRS process.