



# **Business Operations Agreement**

## **Schedule 2**

### **Appendix 11 – Data Retention and Information/Record Disposal**

**TfL\_scp\_000555**

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## 1 Overview

This document sets out the data retention periods for Data processed and the disposal of records and information by the Service Provider for the Congestion Charging Scheme, including Low Emission Zone (LEZ). This is primarily focussed on Data that refers to individuals but also includes types of Data that do not comprise of Personal Data.

Records disposal is to aid with:

- Reducing multiple sets of identical records and Data.
- Removing obsolete or inaccurate information.
- Improving business processes.
- Meeting legislative compliance standards in record keeping.
- Creating corporate rules for records disposal as part of new system implementation.

This appendix should be reviewed annually to ensure its continuing applicability to the unit's records. Any changes made to the schedule should be referred to TfL's Information Governance Team within General Counsel for approval

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

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.

### 1.1 Disposal of records

Records should be either destroyed when their business, regulatory or reference value has expired.

## 1.2 Responsibility for managing records disposal

Responsibility for overseeing and monitoring the appropriate disposal of the unit's records (in all formats) in accordance with the provisions of this document should be allocated to an Authorised Users as agreed with TfL

## 2 Electronic Records

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
<b>2.1 Images</b>				
1- Image capture of event – charge payment	All Images of Vehicles shall be deleted after forty eight (48) hours unless subject to other retention requirements detailed in this appendix.		Forty eight (48 h)ours	This period is smallest that allows business process to complete.
52 – Image of capture event for Vehicles registered for Auto Pay Service	Images that have been matched to an active Auto Pay Service shall be deleted within twenty four (24) hours of payment being made and the period for the Customer being able to dispute the Charge.  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.		Twenty four (24) hours following the statement date plus dispute representation period sixty (60) days for the Auto Pay Services.	This period is smallest that allows business process to complete.  This is required as customers have up to 60 days to challenge a CC Autopay charge or Fleet Autopay Charge.
3 – Image of capture event – Exempt	Images that have been matched to a VRM identified as Exempt from the Scheme at the time and point of capture.		Twenty four (24) hours.	This period is smallest that allows business process to complete.

4 – Image of capture event – Contraventions	Images retained to support a PCN shall be deleted from the permanent evidence store thirteen (13) Months after closure of the PCN (e.g. Appeal, cancellation and TfL write-off).		Thirteen (13) Months.	This period is smallest that allows business process to complete. This retention period is required as PCNs can be challenged following cancellation, payment or write off. Retaining the evidence allows TfL to counter any challenges following cancellation, payment or write off.
5- VoSI Images and associated audit Data	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. The maximum period for VoSI monitoring is six (6) Months. Retention shall be for a maximum of seven (7) Months.		One (1) Month after VRM end date for VoSI entry.	This period is smallest that allows business process to complete. This retention period is directly associated with the VOSI functionality and allows for the VOSI customer (primarily the Police) to review the information and determine whether or not the image is required.
7- Evidential Record Deletion Log	This information shall be retained for four (4) weeks from the creation of the log entry.		Four (4) weeks	This period is smallest that allows business process to complete.
8- Evidential Record 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).		--	This period is smallest that allows business process to complete.
9- SR Session Log	Data to be retained for thirteen (13) Months within Core IT following PCN closure.		Thirteen (13) Months following PCN close	This period is smallest that allows business process to complete..

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
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<b>2.2 Vehicle Data</b>				
10 - Exempt Vehicle List	The Exempt Vehicle List shall be deleted twenty four (24) months following the end of the date that the list refers to.		Twenty four (24) Months	New
11 – Vehicle Data	All vehicle data 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 vehicle data provider		One (1) Month	This period is the shortest that allows for Business process to complete as the process of confirmation can take up to four (4) Months depending on the response from the vehicle data provider
12- Audit log of access to DVLA vehicle data	Vehicle Data access shall be retained for a period of twenty four (24) Months for audit purposes in line with Vehicle Data provider's requirements.		Twenty four (24) Months	Data Owner requirements
13 –Test Data	Test Data		Only as long as necessary for Testing purposes	Regulatory – DPA

<b>ID # - Data Item</b>	<b>Description</b>	<b>Statutory retention requirement or code of practice retention</b>	<b>TfL Retention Period</b>	<b>Reason for Retention</b>
<b>2.3 Customer Data</b>				
14 – Account Data	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		Twenty four (24) Months	This period is the shortest that allows for Business Process to complete/Financial

	remaining Customer Data will be deleted.			Regulations
15 - Discount Service	Discount Service Data shall be deleted forty (40) Months from the date of expiry of the Discount. For Discount rejections the Discount Service Data shall be deleted forty (40) Months from the date of rejection of the Discount.		Forty (40) Months	New
16 – Customer Record Data	Customer Record Data shall be deleted forty (40) Months after the Customer Record creation date.		Forty (40) Months	New
17 - Anonymous Record Data	Anonymous Records are created when an interaction occurs that has insufficient Customer data to create either a Customer Record or an Account. This Data should be deleted in line with the Data retention period of the associated transaction.		Varies	New
18 - Charge Payments	Charge Payment details shall be deleted twenty four (24) Months following the end of the validity of the Charge Payment.		Twenty four (24) Months	Regulatory (Financial)
19 - General Customer scanned correspondence	Scanned images produced from scanning an item of correspondence shall be deleted twenty four (24) Months from the date of resolution.		Twenty four (24) Months	This is shortest period that allows for the business process (appeals) to complete.
20 - Discount Registration forms & supporting Documentation	Discount Service Data shall be deleted forty (40) Months from the date of expiry of the Discount. For Discount rejections the Discount Service Data shall be deleted forty (40) Months from the date of rejection of the		Forty 40 (Months	This is shortest period that allows for the business process (appeals) to complete.

	Discount.			
21 – Account/Service Amendments	All Account and Service amendments shall be retained for one hundred and seventy five (175) days from the date of the amendment.		One hundred and seventy five (175) days	New
22 – Subject Access Request Data	SARs shall be deleted twelve (12) Months following closure of the SAR process or the rejection of a SAR.		Twelve (12) Months	This is shortest period that allows for the business process (appeals) to complete and allows for the resolution of complaints to the Information Commissioner
23 - Scanned Images	Unless otherwise specified, scanned document images should be retained for twenty four (24) Months from the scan date.		Twenty four (24) Months	This is shortest period to allow for appeals etc. To occur.
24 - Fulfilment documents	Unless otherwise specified Fulfilment documents shall be retained for twenty four (24) Months from the date of creation.		Twenty four (24) Months	This is shortest period to allow for appeals etc. To occur
25 - Fulfilment XML for SPSL	This shall be retained for twenty four (24) Months from the date of creation.		Twenty four (24) Months	New

<b>ID # - Data Item</b>	<b>Description</b>	<b>Statutory retention requirement or code of practice retention</b>	<b>TfL Retention Period</b>	<b>Reason for Retention</b>
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<b>2.4 Auto Pay Data – CC Auto Pay and Fleet Auto Pay</b>				
26 – Additions of Vehicles to the Auto Pay Service	VRMs added to the Auto Pay Service shall be deleted sixty (60) days after the VRM has been removed from the Auto Pay Service.		Sixty (60) days	This is shortest period that allows for the business processes around vehicles on accounts to complete
27 – additions of ad-hoc Vehicles to Fleet Auto Pay	Ad-hoc VRMs added to the Fleet Auto Pay Service Charge shall be deleted sixty (60) days after the successful payment of the Statement on which the ad-hoc VRM is detailed.		Sixty (60) days	This is shortest period that allows for the business processes around vehicles on accounts to complete
28 - Vehicle Usage on the Auto Pay Service	Vehicle usage on an Auto Pay Service shall be deleted sixty (60) days after the successful payment of the Statement on which the vehicle usage is detailed.		Sixty (60) days	New
29 – Removal of Vehicles from the Auto Pay Service	Where a vehicle(s) is removed from the Auto pay Service the vehicle(s) shall be deleted sixty (60) days after the successful payment of the Statement. Or 60 days after an Auto Pay Service is forcibly closed by TfL.		Sixty (60) days	This is shortest period that allows for the business processes around accounts to complete
30 – Auto Pay financial account Data	The detailed Auto Pay finance Data is required to support the financial audit analysis, as only summary Data is retained by the finance application.		Six plus one (6+1) years	Regulatory (Financial)
31 – Auto Pay Service Data	All Data should be retained for thirteen (13) Months following the Auto Pay Service closure (payment/write off) where the Service closure has not been instigated by TfL (e.g. fraud) All summary Data should be retained indefinitely regardless of the closure reason		Thirteen (13) Months	This is shortest period that allows for the business processes around vehicles on accounts to complete

32 – Incomplete Auto Pay Service Data	Incomplete Registrations for the Auto Pay Service shall be removed thirteen (13) Months after the initial date of application.		Thirteen (13) Months	This is shortest period that allows for the business processes around vehicles on accounts to complete
33 – Fraudulent activity on the Auto Pay Service	For Fleet Auto Pay payment accounts that have been closed in the last 13 months, and CC auto Pay payment accounts that have been closed in the last 2 years with a status change reason of 17, 18 or 19 (Closed with debt) a Customer Dispute will be created for the customer and the VRMs associated to the Payment Account. The dispute for Fleet Auto Pay will last for 13 months after the payment account closure date, and the dispute for CC Auto Pay will last for 28 months after the closure date.		Thirteen (13) Months	Financial Regulations
34 – Outstanding debt on an Auto Pay Service	All Data, including financial and VRM usage should be retained thirteen (13) Months following payment or TfL write-off.		Thirteen (13) Months	Financial Regulations
35 – Auto Pay Statements	All Auto Pay Statements shall be retained as long as the Auto Pay Service is open and active. Once closed the Statement Data shall be retained for a further thirteen (13) Months.		Thirteen (13) Months.	New
36 – Auto Pay Correspondence	All Auto Pay correspondence shall be retained as long as the Auto Pay Service is open and active. Once closed the 10orrespondence shall be retained for a further thirteen (13) Months.		Thirteen (13) Months	Financial Regulations

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
<b>2.5 Finance (Accounting)</b>				
37 - Current individual financial transactions	This Data will be retained online within the System. A Monthly process shall archive this Data following the eighteen (18) Month period.		Eighteen (18) Months from transaction date.	Financial Regulations
38 - Archived individual financial transactions	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.		Six plus one (6 + 1) years	Financial Regulations
39 - Accounts detailed journals	This summary Data shall be retained for six plus one (6+1) years for audit purposes.		Six plus one (6 + 1) years	Financial Regulations
40 - Chargebacks	This summary Data shall be retained for six plus one (6+1) years for audit purposes.		Six plus one (6 + 1) years	Financial Regulations

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
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<b>2.6 Management Information</b>				
41 – Financial MIS Data	Data shall be retained for six plus one (6+1) years once transferred to MIS.		Six plus one (6+1) years	Financial Regulations
42 – All Other MIS Data	Data shall be retained for three plus one (3+1) years once transferred to MIS. After this period the Data shall only be retained if the equivalent data in the Service Systems is still retained. The Data shall be purged no less than once a Month or as otherwise agreed with TfL.		Three plus one (3+1) years	New

<b>ID # - Data Item</b>	<b>Description</b>	<b>Statutory retention requirement or code of practice retention</b>	<b>TfL Retention Period</b>	<b>Reason for Retention</b>
<b>2.7 Miscellaneous</b>				
43 – Call Centre call recordings	All call recordings shall be retained for ninety (90) days following the date of the call recording.		Ninety (90) days	This is shortest period to allow retrieval of records where a transaction may be queried either as part of the PCN process or for dealing with appeals regarding business transactions
44 – Audit of user password resets	Audit of User password resets shall be retained for twelve (12) Months from creation.		Twelve (12) Months	This is the shortest period required to ensure that system security is maintained
45 – IVR	This table holds session information for all interactions via the IVR. IVR drop outs can be deleted the same day.		Seven (7) days	New

46 – User Audit log Data	Sign-on and Sign-off, transactions shall be retained for twelve (12) Months from creation.		Twelve (12) Months	This is shortest period to allow retrieval of records where a transaction may be queried either as part of the PCN process or for dealing with appeals regarding business transactions
47 – Security Log Data.	Retained for twelve (12) Months from creation.		Twelve (12) Months	New
48 – CCTV recordings of post opening and scanning	Retained for six (6) Months following recording.		Six (6) Months	This is shortest period to allow retrieval of records where a transaction may be queried either as part of the PCN process or for dealing with appeals regarding business transactions
49 – CCTV recordings of the operation	Retained for six (6) Months following recording.		Six (6) Months	New
50 – Backup Tapes	Back up tapes are to be overwritten at the end of an eight (8) week cycle.			This is the shortest period to allow system recovery in the event of a system failure.
51 – Interface Log Data	All interface log data shall be retained for twenty four (24) Months following the event.		Twenty four (24) Months	Required for system audit purposes
52 - System Audit Log	Audit of any system audit logs relating to PCI DSS shall be retained for twelve (12) Months from creation.	N/A	Twelve (12) months	Required for PCI DSS system audit purposes.

### 3 Physical Records

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

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
<b>3.1 Image</b>				
52 - Changes in Image System components.	This is a hardcopy log of new releases of Hardware, underlying operating Systems or application Software components		Five (5) years	New

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
<b>3.2 Customer Sales &amp; Discounts</b>				
53 - Discount application forms and evidence – Hard copy	Documents shall be retained for a period of thirty (30) days following the scan date.		Thirty (30) days	This is to allow for disputes etc
54 - General Correspondence – Hard copy	Documents shall be retained for a period of thirty (30) days following the scan date.		Thirty (30) days	New

ID # - Data Item	Description	Statutory retention requirement or code of practice retention	TfL Retention Period	Reason for Retention
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<b>3.3 Auto Pay Data</b>				
55 - Discount application forms and evidence – Hard copy	Documents shall be retained for a period of thirty (30) days following the scan date.		Thirty (30) days	New

<b>ID # - Data Item</b>	<b>Description</b>	<b>Statutory retention requirement or code of practice retention</b>	<b>TfL Retention Period</b>	<b>Reason for Retention</b>
<b>3.4 Finance (accounting)</b>				
56 - Payment related correspondence – hard copies	From scan date.		Thirty (30) days	This is to allow for disputes etc
57 - Accounts journals	From scan date.		Six plus one (6 + 1) years	Financial Regulations

<b>ID # - Data Item</b>	<b>Description</b>	<b>Statutory retention requirement or code of practice retention</b>	<b>TfL Retention Period</b>	<b>Reason for Retention</b>
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<b>3.5 Miscellaneous</b>				
58 - Data from other agencies	This shall be retained for seven (7) days after being loaded/ applied to the system.		Seven (7) days	This is to allow for disputes etc

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