



Enforcement Operations

Schedule 2

Appendix 24 –

Data Retention and Information/Record Disposal

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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. 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 document does not replicate any information listed in the TfL corporate [Information and Records Disposal Schedule](#); the latter should be used in conjunction with this schedule.

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.

Any hard copy records which have to be kept for a period of time before destruction (e.g. longer than 1 year after the last action) should be transferred to the [Records Custody Service](#).

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 advice	TfL Retention Period	Reason for Retention
2.1 Images				
#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.	N/A	48 hours	This period is smallest that allows business process to complete.
#2 Image of capture event for vehicles registered for account payment	<p>Images that have been matched to an active Account shall be deleted within twenty four (24) 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>	N/A	24 hours post statement date for all matched / longer for disputed accounts (60 days)	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 all Schemes in force at the time and point of capture.	N/A	24-hours	This period is smallest that allows business process to complete.
#4 Image of capture contraventions	Images retained to support a PCN in Notice Processing Service System shall be deleted thirteen (13) Months after closure of the PCN (e.g. Appeal, cancellation and TfL write-off).	N/A	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 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).	N/A	Deleted in line with Evidential Record removal	This period is smallest that allows business process to complete. See ID4 for business justification.

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.2 Notice Processing Service System				
#6 DVLA batch Data (from WEE batch / SFT)	All DVLA responses shall be recorded against a Penalty Charge once it has been confirmed. However the process of confirmation can take up to four (4) Months depending on the response from the DVLA.	N/A	4 months	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 DVLA
#7 DVLA test Data	DVLA test data; the period the data is required to be retained will be agreed between The Service Provider and TfL at the time of testing.	N/A	6 months	Regulatory

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.3 Enforcement				
#8 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)	This Data is required in the Notice Processing Service System to enable any investigation into the PCN history and retrieval of relevant documents. PCN data in Notice Processing Service System will be deleted 7 years after the closure of the PCN.	N/A	7 years (6 +1)	This period is the shortest that allows for appeals etc to be processed.
#9 Statutory Declarations scanned correspondence image	This Data is required to enable any investigation into the PCN history and retrieval of relevant documents.	N/A	7 years (6 +1)	This period is the shortest that allows for appeals etc to be processed.
#10 Representation & Appeals scanned correspondence image	This Data is required to enable any investigation into the PCN history and retrieval of relevant documents.	N/A	7 years (6 +1)	This period is the shortest that allows for appeals etc to be processed.
#11 Enforcement documents - Scan failures	Scanned documents which are deemed unsuccessfully scanned shall be removed from short term storage and retained as per unscanned documents for a period of three (3) Months.	N/A	3 months	Required to be retained to support the collection of the PCN and/or for dealing with any challenges/appeals that may result in relation to a PCN.
#12 Enforcement documents - Scanned	Once document has been scanned the hard copy shall be retained for this period to ensure that the scanned copy is legible.	N/A	3 months	Shortest period to ensure that the scanned copy is legible
#13 Dispensation application form	Dispensation application form which is dated from date the dispensation ended	N/A	2 years	Use to support processing representation

#14 Dispensation data including all contents of the application form and further correspondence from the customer.		N/A	7 (6+1) years	
#15 Unallocated correspondence (not able to allocated to a PCN record)	All unallocated correspondence from the date of item being worked (closed)	N/A	2 years	
#16 TE Contravention - still images	The contravention footage taken contains still images which should be aligned to the DTES retention Policy	N/A	In accordance to the DTES Retention Policy. Please refer to the appropriate document for further details.	Use to support future queries from the customer.

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.4 Customer Sales & Discounts				
#17 Subject Access Request Data	Subject access requests for personal data under the Data Protection Act 1998. SARs shall be deleted twelve (12) Months following closure of the SAR process or the rejection of a SAR.	N/A	Twelve (12) Months	Consistent with TfL Corporate retention period for subject access requests and allows for the resolution of complaints to the Information Commissioner
#18 Service Request Data	Closed Service Requests will be removed from XOps 12 months after their last update date.	N/A	12 Months	Shortest period required for auditing of Service Request
#19 Interaction Record Data	Interaction Records will be removed from XOps 12 months after their creation date.	N/A	12 Months	Shortest period required for reporting purposes.

#20 Print Partner Data	The Print Partner will remove all electronic data it holds 10 days after it was printed for a period of 3 months after which the retention period will reduce to 48 hours. This includes all data they receive from the Notice Processing Service System, as well as all data they send to the customer (and back to the LRUC systems).	N/A	10 Days	Shortest period required for process to allow for auditing of customer correspondence.
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Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.5 Finance & Accounting				
#21 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 (from the transaction date). In Notice Processing Service System, financial transactions will not be removed while there is an effective customer dispute. In XOps, financial transactions will only be removed once they are cleared.	N/A	7 Years (6+1)	<p>Financial Regulations. Some statutes, which may bear on retention periods for documents of various departments and agencies, are:</p> <ul style="list-style-type: none"> • Civil Evidence Act 1995 • Value Added Tax Act 1994 • Companies Acts 1985 and 1989 • Consumer Protection Act 1987 • Financial Services Act 1986 • Limitation Act 1980 <p>This is not an exhaustive list of all Statutes which may have a bearing on the retention of financial records. See legislation.gov.uk for all UK legislation.</p>

#22 Archived individual financial transactions	This Data shall be retained off-line on disk to ensure that financial Data is retained for a total of six plus one (6+1) years.	N/A	7 Years (6+1)	As per #21 above
#23 Accounts detailed journals	The Financial Data within the Service Providers financial system shall be retained for six plus one (6+1) years for audit purposes.	N/A	7 Years (6+1)	As per #21 above.
#24 Chargebacks	The Financial Data within the Service Providers financial system shall be retained for six plus one (6+1) years for audit purposes.	N/A	7 Years (6+1)	As per #21 above.

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.6 Management Information Systems (MIS)				
#25 MIS Data	<p>Financial MIS Data (such as PCN payments, refunds, bad debtors etc) shall be retained for six plus one (6+1) years once transferred to MIS.</p> <p>All other MIS Data (such as warning notices, PCN events, customer data, representations/appeals/statutory declarations, dispensations etc) shall be retained for three plus one (3+1) years once transferred to MIS.</p> <p>After this period the Data shall only be retained if the equivalent Data is still retained in either the Notice Processing Service System(s) or the Operational IT System(s).</p> <p>The Data shall be deleted no less than once a month or as otherwise agreed with TfL.</p>	N/A	7 Years (6+1) and (3+1) years once transferred to MIS.	As per #21 above

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.7 Miscellaneous				
#26 Scanned Images	Unless otherwise specified, scanned document images should be retained for 7 (6+1) years from the scan date.	N/A	7 Years (6+1)	This is shortest period to allow for appeals etc. to occur.
#27 Dispute Data	All disputes will be retained on Notice Processing Service System(s) until they expire. Customer disputes expire 7 years from the date raised	N/A	7 Years (6+1)	Records held for shortest period until dispute expires.

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
2.8 System Operations				
#28 Call Centre call recordings	Contact Centre records	N/A	90 Days from date of recording (unless identified as being relevant to an ongoing investigation)	This is shortest period to allow retrieval of records where a transaction may be queried either as part of the PCN process or form dealing with appeals regarding business transactions. Consistent with retention period in TfL corporate retention schedule
#29 Audit of user password resets	Audit of User password resets shall be retained for thirteen (13) Months from creation.	N/A	13 months	This is the shortest period required to ensure that system security is maintained
#30 User Audit log Data	Sign-on and Sign-off, transactions shall be retained for thirteen (13) Months from creation.	N/A	13 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
#31 User Access into Secure Areas Log Data.	The retention period as defined in the Premises Rules	N/A	Premises Rules	This is the shortest period required to ensure that system security is maintained
#32 Scan Partner CCTV recordings of post opening and scanning.	Retained for three (3) Months following recording.	N/A	3 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
#33 Backup Tapes		N/A	8 weeks	This is the shortest period to allow system recovery in the event of a system failure.
# 34 Subject Access Request Data	SARs shall be deleted twelve (12) Months following closure of the SAR process or the rejection of a SAR.	N/A	Twelve (12) Months	Consistent with TfL Corporate retention period for subject access requests and allows for the resolution of complaints to the Information

				Commissioner
# 35 Interface Log Data	Audit data of messages captured at the Notice Processing Service System boundary will be retained for a period of 13 months following the event.	N/A	13 months	Required for system audit purposes
# 36 Drop Box Audit Log	Recordings of all administration data and executables to and from the Notice Processing Service Systems and Applications.	N/A	30 days	Required for system audit purposes
# 37 Personal Information Audit Log	Audit of access to Personal Information data shall be retained for thirteen (13) Months from creation.	N/A	13 months	Required for system audit purposes
# 38 System Administrator Audit Log	Audit of any administrator audit logs shall be retained for thirteen (13) Months from creation.	N/A	13 months	Required for system audit purposes
# 39 System Audit Log	Audit of any system audit logs relating to PCI DSS shall be retained for twelve (12) Months from creation.	N/A	12 months	Required for PCI DSS system audit purposes.

3 Physical Records

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
3.1 Enforcement				
#40 Enforcement documents - Unscanned	Refers to CDs / DVDs which cannot physically be scanned. Retained for thirty three (33) Months.	N/A	33 months	Required to be retained to support the collection of the PCN and/or for dealing with any challenges/appeals that may result in relation to a PCN.
#41 Enforcement documents - Scan failures	Refers to CDs / DVDs which can not physically be scanned. Retained for thirty three (33) Months.	N/A	33 months	Required to be retained to support the collection of the PCN and/or for dealing with any challenges/appeals that may result in relation to a PCN.
#42 Scan Partner Enforcement documents - Scanned	Scanned and retained for three (3) Months.	N/A	3 months	Shortest period to ensure that scanned copy is legible
#43 Scan Partner PCN related correspondence - Hard copies	Secure and accessible storage required until destruction. Three (3) Months following receipt as long as successfully scanned. If not successfully scanned within three (3) months, then hard copy must be retained until successfully scanned. Requirement only applies to incoming post.	N/A	3 months	Shortest period to ensure that scanned copy is legible

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
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3.2 Miscellaneous				
#44 Scan Partner General correspondence - hard copy	General correspondence including Enquires and Complaints shall be retained for a thirty (30) days period once the document has been scanned.	N/A	30 days	This is to allow for disputes etc
#45 Data from other agencies	To be securely disposed off once the items have been successfully scanned into the System, such as DVLA, PATAS data.	N/A	In accordance to section 2.3 above.	This is to allow for disputes etc.
#46 PMA documents (TfL Responsibility)	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.	N/A	TfL estate and responsibility	NA - Not part of LRUC system

Data Item	Description	Statutory retention requirement or code of practice retention advice	TfL Retention Period	Reason for Retention
3.3 System Operations				
#47 Backup Tapes	Overwritten at end of eight (8) week cycle.	N/A	8 weeks	To allow for investigations etc.