

**Greater London Authority (GLA)  
Road User Charging Appeal Service**

**Appendix 2 –  
Data Retention and Information/Record  
Disposal  
Statement of Requirements**

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## **1 Overview**

This Appendix sets out the Data Retention Periods for Data processed and the disposal of records and information by the Service Provider for the Appeals Service under this contract. This is primarily focused 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 shall be reviewed annually to ensure its continuing applicability to the Appeal Service records. Any changes made to the schedule should be referred to GLA 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:

- Appeal including any review or cost claim
- Customer Complaint;
- a complaint to an Ombudsman; or
- any other court or legal proceedings.

### **1.1 Disposal of records**

Records shall be 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) shall be securely retained.

### **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 shall be allocated to an Authorised User as agreed with GLA.

## 2 Electronic Records

Data Item	Description	Statutory retention requirement or code of practice retention advice	GLA Retention Period	Reason for Retention
<b>2.1 Correspondence</b>				
2.1.1 Appeals scanned correspondence image	This Data is required to enable any investigation into the Appeal / PCN history and retrieval of relevant documents.	N/A	Eighteen (18) months from the date of the last action on case.	This period is the shortest that allows for Appeals etc to be processed.
2.1.2 Appeal 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	Six (6) months from date of last action on case.	Required to be retained to support any queries or issues arising in dealing with any challenges/Appeals
2.1.3 Appeal 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	Immediately after the images has been verified as scanned.	Shortest period to ensure that the scanned copy is legible
2.1.4 Unallocated correspondence	All unallocated correspondence from the date of	N/A	Eighteen (18) months from the	Required to be retained to support any queries or

(not able to allocated to an Appeal or related PCN record)	item being worked (closed)		date of the last action on case.	issues arising in dealing with any challenges/Appeals
2.1.5 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 GLA retention period for subject access requests and allows for the resolution of complaints to the Information Commissioner
<b>2.2 Management Information Systems (MIS)</b>				
2.2.1 MIS Data	All MIS Data shall be retained in line with the Appeals case retention period.  The Data shall be deleted no less than once a Month or as otherwise agreed with GLA.	N/A	<ul style="list-style-type: none"> <li>• All MIS Reports produced shall be retained indefinitely</li> <li>• Daily Reports Eighteen (18) Months</li> </ul>	Required to be retained to support any queries or issues arising
<b>2.3 Miscellaneous</b>				
2.3.1 Scanned Images	Unless otherwise specified, scanned document images should be retained for 7 (6+1) years from the scan date.	N/A	Eighteen (18) months from the date of the last action on case.	This period is the shortest that allows for Appeals etc to be processed.

2.3.2 Dispute Data	All disputes will be retained on the Appeal Service System(s) until they expire. Customer disputes expire 7 years from the date raised.	N/A	Eighteen (18) months from the date of the last action on case.	Records held for shortest period until dispute expires.
<b>2.4 System Operations</b>				
2.4.1 Call Centre Call Recordings	Contact Centre records	N/A	Three (3) months 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 Appeal process or from dealing with appeals regarding business transactions. Consistent with GLA retention period
2.4.2 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 GLA retention period for SARs and allows for the resolution of complaints to the Information Commissioner
2.4.3 All system data and audit logs	Audit data captured by the Appeal Service System(s) including: <ul style="list-style-type: none"> <li>• Transaction Messages</li> <li>• Recordings of all administrative data and</li> </ul>	N/A	Eighteen (18) months.	Required for system audit purposes

	<p>executables (to and from)</p> <ul style="list-style-type: none"> <li>• access to Personal Information data</li> <li>• System Audit logs</li> <li>• Administrator Audit logs</li> </ul>			
<b>2.5 Enforcement</b>				
2.5.1 Appeal documents - Unscanned	Refers to CDs / DVDs which cannot physically be scanned. Retained for thirty three (33) Months.	N/A	Six (6) months from the date of last action on the case.	Required to be retained to support the decision making and evidence requirements and/or for dealing with any challenges/ subsequent appeals that may result
2.5.2 Appeal documents - Scan failures	Refers to CDs / DVDs which can not physically be scanned. Retained for thirty three (33) Months.	N/A	Six (6) months from the date of last action on the case.	Required to be retained to support the decision making and evidence requirements and/or for dealing with any challenges/ subsequent appeals that may result
2.5.3 Scan Partner Appeal documents - Scanned	Scanned and retained for three (3) Months.	N/A	Immediately after the images has been verified as scanned.	Shortest period to ensure that scanned copy is legible
2.5.4 Scan Partner Appeal related correspondence - Hard copies	Secure and accessible storage required until destruction. Three (3)	N/A	Immediately after the images has been verified as scanned.	Shortest period to ensure that scanned copy is legible

	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.			
<b>2.6 Miscellaneous</b>				
2.6.1 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	Immediately after the images has been verified as scanned.	This is to allow for disputes etc
2.6.2 Data from other agencies	Such as TEC, DVLA, TfL etc where relevant. is to be securely disposed of.	N/A	<ul style="list-style-type: none"> <li>• Data immediately after the images has been verified as scanned.</li> <li>• When part of an Appeals case, to be retained In accordance with section 2.3.1 above</li> </ul>	This is to allow for disputes etc.