

SCHEDULE E: ANALYTICS, REPORTING, ARCHIVE AND METADATA ACCESS CONTROL SCHEDULE

VERSION 1.1 - EFFECTIVE FROM [.]

Introduction

This **Analytics, Reporting, Archive and Metadata Access Control Schedule** is a schedule to our agreement with you.

It sets out:

- the **switching metadata** we will collect, process and analyse from your use of the **hub**;
- what, how and to whom we will report; and
- the controls we have in place to restrict access to **switching metadata** and the reports we derive from its analysis.

This schedule does not deal with our handling of **personal data**. Information on how we:

- process **personal data** on your behalf as a **data processor** can be found in the **Data Protection Schedule**; and
- process **your business contact** personal data as a **data controller** can be found in our **Privacy Policy**.

What switching metadata will we collect, process and analyse?

*What do we collect? Audit Trail of actions in **hub***

Every action in the **hub** is logged as part of our **hub's** audit trail. The audit trail data will be kept for all actions performed by the **hub** post office or one of the associated portals, such as the administration portal. All actions will be sequenced, timestamped, and stored securely to prevent tampering or unauthorised access. All logging will be stored in a centralised location and capable of free text searching.

*What do we store? **Hub** Archive*

After a **switching message** has been sent through the **hub** and delivery to the recipient has been confirmed, the different elements of the **switching message** (other than the **switching message** content which will be deleted) will be stored in our **hub** archive in accordance with the deletion /archiving policy set out below:

- **switching metadata** (GRCP/LRCP IP, message type, etc)
 - deletion 24 months after generation
- invoices and billing information
 - deletion after 7 years (tax and legal requirement to retain)

We do not store, archive or otherwise retain any **switching message** content.

What do we analyse? Use of **switching metadata** for our analysis and reporting

We will not access or process the **personal data** in the **switching message** content for any analysis or reporting.

The data in the **switching message** envelope contains no personal data and this will be used as **switching metadata** for our analysis and reporting.

What, how and to whom will we report?

You will be able to access your own **switching metadata** and run **your** own reports using our self-service portal.

We will provide reports to Ofcom ~~in accordance with our legal obligations set out in the annex to this schedule, see page 3-5.~~

We will generate and use reports of the following purposes:

- Customer service
- Generating invoices
- Understanding hub usage patterns, performance and security
- Analysing the health of the switching process
- Reporting to industry of anonymised statistics

What access controls do we have to protect access to switching metadata and derived reports?

We will keep **switching metadata** and derived analysis and reports confidential and secure as set out in our **Security Policy**.

To protect the commercial sensitivity of this information, **we** have put in place the following access controls for **switching metadata** and derived analysis and reports:

- Access is barred to all TOTSCo constituency directors and their alternates.
- Access is restricted to those TOTSCo employees and contractors that need to know this information.

Annex – Ofcom reports

We will provide the following reports to Ofcom:

Area	What (monthly reporting)	Possible technical approach to measure this	Priority (1-3)
Setup	(1) Users: How many and which CPs have onboarded to use the Hub (list of companies and brands)	Number and list of residential CPs (company and brand) registered as Hub users.	1-High
Hub and messaging health indicators	(2) Total use: How much is the Hub being used (reported by time period)	Total messages received.	1-High
	(3) Uptime/downtime: Is the Hub sufficiently resilient/available for CPs and are there reasons given for significant periods of downtime	% Availability/ downtime of Hub.	1-High
	(4) Message flow: Are all CPs correctly receiving messages from other providers via the Hub	Count of message delivery failures logged by intended recipient CP of message. This is intended to give a view on number of messages of any type which could not be delivered to a particular CP (i.e., they did not make themselves available to receive).	3-Low
OTS process health indicators	(5) Successful switches: How many switches have successfully reached the stage of GP requesting the LP to cease the contract/service	Count of Residential Switch Order Trigger messages (GP requests and LP confirmations). We understand that this does not necessarily indicate a fully successful switch.	1-High
	(6) Match requests (GP): How many matching requests have been sent by each GP	Count of Residential Match Request messages by CP	1-High
	(7) Successful matches/match failures (LP): What percentage of matching requests received by LP were successful (i.e., are any LPs misusing the system to make switching more difficult)? [What percentage of matching failures were sent and can we indicate how many of each failure reason there were if feasible]	Count of Residential Match Request Confirmation as % of sum of Count of Residential Switch Request Confirmation and Count of Residential Switch Request Failure, all by CP.	1-High
	(8) Successful matches/match failures (GP): What percentage of matching requests sent by GP were	Count of Residential Match Request Confirmation received and Count of residential Switch Request Failure as %	1-High

	successful or failures [and the reasons for these if feasible] (i.e., are any GPs misusing the system to ‘guess’ customer details)	of Count of Residential Switch Order. All by CP.	
	(9) Switch orders by CP: Is each CP using OTS for residential switching as required (i.e., how many switches are they doing via the Hub)	Count of Residential Switch Order messages sent by each CP.	2-Medium
	(10) Cancellations: Are there any problems in the customer switching journey with any GP after the order is placed (e.g., how many switches were cancelled by each GP by customer request)	Residential Switch Order Cancellations sent as % of Residential Switch Orders for each GP.	2-Medium
	(11) Monitoring Hub use by GP: In addition to the specific points noted above, it would be helpful to have a broad indication that each GP is using the Hub appropriately by monitoring overall use of the Hub by message type.	Gaining Provider messages: Number of each of the following messages sent by each CP: <ul style="list-style-type: none"> ● Residential Match Request (<i>match request</i>) ● Residential Switch Order (<i>order placed</i>) ● Residential Switch Order Update (<i>changes to installation date etc</i>) ● Residential Switch Order Trigger (<i>request to cease LP service</i>) ● Residential Switch Order Cancellation (<i>customer requests to cancel order in progress</i>). 	3-Low
	(12) Monitoring Hub use by LP: In addition to the specific points noted above, it would be helpful to have a broad indication that each LP is using the Hub appropriately by monitoring overall use of the hub by message type.	Losing Provider messages: Number of each of the following messages sent by each CP: <ul style="list-style-type: none"> ● Residential Switch Match Request Confirmation (<i>successful match response</i>) ● Residential Switch Match Request Failure (<i>no match</i>) 	3-Low

		<p><i>found or invalid Switch Order)</i></p> <ul style="list-style-type: none"> ● Residential Switch Order Confirmation <i>(successful response to switch order)</i> ● Residential Switch Order Failure <i>(unsuccessful response to switch order)</i> ● Residential Switch Order Update Confirmation ● Residential Switch Order Update Failure ● Residential Switch Order Trigger Confirmation <i>(confirms services will be ceased)</i> ● Residential Switch Order Trigger Failure <i>(problem ceasing services as requested)</i> ● Residential Switch Order Cancellation Confirmation <i>(switch order successfully cancelled)</i> ● Residential Switch Order Cancellation Failure <i>(switch order cancellation unsuccessful).</i>
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