Abbots Bromley School

32A DATA PROTECTION POLICY

Policies in School	**32A Data Protection Policy**
ISI	Part 6, Provision of Information
NMS (April 15)	
Author Led	Principal
Date of Review	May 2018
Next Review	Summer 2019
Comment	1 year Review
Website	Yes

Abbots Bromley School ('the School') is required to keep and process certain information about its students, parents and staff members in accordance with its legal obligations under data protection legislation.

The School may, from time to time, be required to share personal information about its students or staff with other organisations, mainly other schools and educational bodies, the Department for Education, the Local Authority and potentially children's services.

This policy is in place to ensure all staff and members of the School Council are aware of their responsibilities and outlines how the school complies with the following core principles current data protection legislation. This policy complies with the requirements set out in the GDPR.

Legal framework

1.1 This policy has due regard to legislation, including, but not limited to the following:

- The General Data Protection Regulation (GDPR)
- The Data Protection Act 1998
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998

1.2. This policy will also have regard to the following guidance from the Information Commissioner's Office.

- 'Overview of the General Data Protection Regulation'
- 'Preparing for the General Data Protection Regulation'

2. Applicable data

2.1. For the purpose of this policy, **personal data** refers to information that relates to an identifiable, living individual, including information. The GDPR applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria.

2.2. **Sensitive personal data** is referred to in the GDPR as 'special categories of personal data', which are broadly the same as those in the Data Protection Act (DPA) 1998. These specifically include the processing of genetic data, biometric data and data concerning health matters.

3**. Principles**

3.1. In accordance with the requirements outlined in the GDPR, personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up-to-date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3.2. The GDPR also requires that "the controller shall be responsible for, and able to demonstrate, compliance with the principles".

4. Accountability

4.1. Abbots Bromley School implements appropriate technical and organisational measures to ensure that data is processed in line with the principles set out in the GDPR.

4.2. The school provides comprehensive, clear and transparent privacy policies.

4.3. Records of activities relating to higher risk processing are maintained, such as the processing of special categories data or that in relation to criminal convictions and offences.

4.4. Internal records of processing activities will include the following:

- Name and details of the organisation
- Purposes of the processing
- Description of the categories of individuals and personal data Retention schedules
- Categories of recipients of personal data
- Description of technical and organisational security measures
- Details of transfers to third countries, including documentation of the transfer mechanism safeguards in place

4.5. The school will implement measures that meet the principles of data protection by design and data protection by default, such as:

- Data minimisation
- Transparency.
- Allowing individuals to monitor processing.
- Continuously evaluating security features.

4.6. Data protection impact assessments will be used, where appropriate.

5. Lawful processing

5.1. The legal basis for processing data will be identified and documented prior to data being processed.

5.2. Under the GDPR, data will be lawfully processed under the following conditions:

- The consent of the data subject has been obtained. Processing is necessary for:
- Compliance with a legal obligation.
- The performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- For the performance of a contract with the data subject or to take steps to enter into a contract.
- Protecting the vital interests of a data subject or another person.
- For the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject. (This condition is not available to processing undertaken by the School in the performance of its tasks).

5.3 Processing is necessary for:

- Carrying out obligations under employment.
- Protecting the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent.

- The establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity.
- Reasons of substantial public interest which is proportionate to the aim pursued and which contains appropriate safeguards.
- The purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services or a contract with a health professional.

6. Consent

6.1. Consent must be a positive indication. It cannot be inferred from silence, inactivity or pre-ticked boxes.

6.2. Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual's wishes.

6.3. Where consent is given, a record will be kept documenting how and when consent was given.

6.4. The school ensures that consent mechanisms meet the standards of the GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data must be found, or the processing must cease.

6.5. Consent accepted under the Data Protection Act will be reviewed to ensure it meets the standards of the GDPR; however, acceptable consent obtained under the DPA will not be reobtained.

6.6. Consent can be withdrawn by the individual at any time.

6.7. The consent of parents will be sought prior to the processing of their data, except where the processing is related to preventative or counselling services offered directly to a child.

7. The right to be informed

7.1. The privacy notice supplied to individuals in regards to the processing of their personal data will be written in clear, plain language which is concise, transparent, easily accessible and free of charge.

7.2. If services are offered directly to a child, the school will ensure that the privacy notice is written in a clear, plain manner that the child will understand.

7.3. In relation to data obtained both directly from the data subject and not obtained directly from the data subject, the rationale will be communicated to the data subject.

7.4. Where data is obtained directly from the data subject, information regarding whether the provision of personal data is part of a statutory or contractual requirement, as well as any possible consequences of failing to provide the personal data, will be provided.

7.5. Where data is not obtained directly from the data subject, information regarding the categories of personal data that the school holds, the source that the personal data originates from and whether it came from publicly accessible sources, will be provided.

7.6. For data obtained directly from the data subject, this information will be supplied at the time the data is obtained.

7.7. In relation to data that is not obtained directly from the data subject, this information will be supplied:
- Within one month of having obtained the data.
- If disclosure to another recipient is envisaged, at the latest, before the data is disclosed.

- If the data is used to communicate with the individual, at the latest, when the first communication takes place.

8. The right of access

8.1. Individuals have the right to obtain confirmation that their data is being processed.

8.2. Individuals have the right to submit a Subject Access Request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing.

8.3. The school will verify the identity of the person making the request before any information is supplied.

8.4. A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to comply with requests for further copies of the same information.

8.5. Where a SAR has been made electronically, the information will be provided in a commonly used electronic format.

8.6. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged.

8.7. All fees will be based on the administrative cost of providing the information.

8.8. All requests will be responded to without delay and at the latest, within one month of receipt.

8.9. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension, and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

8.10. Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

8.11. In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to.

9. The right to rectification

9.1. Individuals are entitled to have any inaccurate or incomplete personal data rectified.

9.2. Where the personal data in question has been disclosed to third parties, the school will inform them of the rectification where possible.

9.3. Where appropriate, the school will inform the individual about the third parties that the data has been disclosed to.

9.4. Requests for rectification will be responded to within one month; this will be extended by two months where the request for rectification is complex.

9.5. Where no action is being taken in response to a request for rectification, the school will explain the reason for this to the individual, and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

10. The right to erasure

10.1. Individuals hold the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

10.2. Individuals have the right to erasure in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws their consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data is required to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child.

10.3. The school has the right to refuse a request for erasure where the personal data is being processed for the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes
- The exercise or defence of legal claims

10.4. As a child may not fully understand the risks involved in the processing of data when consent is obtained, special attention will be given to existing situations where a child has given consent to processing and they later request erasure of the data, regardless of age at the time of the request.

10.5. Where personal data has been disclosed to third parties, they will be informed about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so.

10.6. Where personal data has been made public within an online environment, the school will inform other organisations who process the personal data to erase links to and copies of the personal data in question.

11. The right to restrict processing

11.1. Individuals have the right to block or suppress the school's processing of personal data.

11.2. In the event that processing is restricted, the school will store the personal data, but not further process it, guaranteeing that just enough information about the individual has been retained to ensure that the restriction is respected in future.

11.3. The school will restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, processing will be restricted until the school has verified the accuracy of the data
- Where an individual has objected to the processing and the school is considering whether their legitimate grounds override those of the individual
- Where processing is unlawful and the individual opposes erasure and requests restriction instead
- Where the school no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim

11.4. If the personal data in question has been disclosed to third parties, the school will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

11.5. The school will inform individuals when a restriction on processing has been lifted

12. The right to data portability

12.1. Individuals have the right to obtain and reuse their personal data for their own purposes across different services.

12.2. Personal data can be easily moved, copied or transferred from one IT environment to another in a safe and secure manner, without hindrance to usability.

12.3. The right to data portability only applies in the following cases:

- To personal data that an individual has provided to a controller
- Where the processing is based on the individual's consent or for the performance of a contract
- When processing is carried out by automated means

12.4. Personal data will be provided in a structured, commonly used and machine-readable form.

12.5. The school will provide the information free of charge.

12.6. Where feasible, data will be transmitted directly to another organisation at the request of the individual.

12.7. The school is not required to adopt or maintain processing systems which are technically compatible with other organisations.

12.8. In the event that the personal data concerns more than one individual, the school will consider whether providing the information would prejudice the rights of any other individual.

12.9. The school will respond to any requests for portability within one month.

12.10. Where the request is complex, or a number of requests have been received, the timeframe can be extended by two months, ensuring that the individual is informed of the extension and the reasoning behind it within one month of the receipt of the request.

12.11. Where no action is being taken in response to a request, the school will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

13. The right to object

13.1. The school will inform individuals of their right to object at the first point of communication, and this information will be outlined in the privacy notice and explicitly brought to the attention of the data subject, ensuring that it is presented clearly and separately from any other information.

13.2. Individuals have the right to object to the following:

- Processing based on legitimate interests or the performance of a task in the public interest
- Direct marketing
- Processing for purposes of scientific or historical research and statistics.

13.3. Where personal data is processed for the performance of a legal task or legitimate interests:
An individual's grounds for objecting must relate to his or her particular situation.
The school will stop processing the individual's personal data unless the processing is for the establishment, exercise or defence of legal claims, or, where the school can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.

13.4. Where personal data is processed for direct marketing purposes:
The school will stop processing personal data for direct marketing purposes as soon as an objection is received.
The school cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.

13.5. Where personal data is processed for research purposes:

- The individual must have grounds relating to their particular situation in order to exercise their right to object.
- Where the processing of personal data is necessary for the performance of a public interest task, the school is not required to comply with an objection to the processing of the data.

13.6 Where the processing activity is outlined above, but is carried out online, the school will offer a method for individuals to object online.

14. Automated decision making and profiling

14.1. Individuals have the right not to be subject to a decision when:

- It is based on automated processing, e.g. profiling.
- It produces a legal effect or a similarly significant effect on the individual.

14.2. The school will take steps to ensure that individuals are able to express their point of view, and obtain an explanation of the decision and appeal it.

14.3. When automatically processing personal data for profiling purposes, the school will ensure that the appropriate safeguards are in place, including:

- Ensuring processing is fair and transparent by providing meaningful information about the logic involved, as well as the significance and the predicted impact.
- Using appropriate mathematical or statistical procedures.
- Implementing appropriate technical and organisational measures to enable inaccuracies to be corrected and minimise the risk of errors.
- Securing personal data in a way that is proportionate to the risk to the interests and rights of the individual and prevents discriminatory effects.

14.4. Automated decisions must not concern a child or be based on the processing of sensitive data, unless:

- The school has the explicit consent of the individual.
- The processing is necessary for reasons of substantial public interest on the basis of Union/Member State law.

15. Privacy by design and privacy impact statements

15.1. The school will act in accordance with the GDPR by adopting a privacy by design approach and implementing technical and organisational measures which demonstrate how the school has considered and integrated data protection into processing activities.

15.2. Data protection impact assessments (DPIAs) will be used to identify the most effective method of complying with the school's data protection obligations and meeting individuals' expectations of privacy.

15.3. DPIAs will allow the school to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school's reputation which might otherwise occur.

15.4. A DPIA will be carried out when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals.

15.5. A DPIA will be used for more than one project, where necessary.

15.6. High risk processing includes, but is not limited to, the following:

- Systematic and extensive processing activities, such as profiling
- Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- The use of CCTV.

15.7. The school will ensure that all DPIAs include the following information:

- A description of the processing operations and the purposes
- An assessment of the necessity and proportionality of the processing in relation to the purpose
- An outline of the risks to individuals
- The measures implemented in order to address risk

15.8. Where a DPIA indicates high risk data processing, the school will consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

16. Data Breaches

16.1.The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

16.2. The Principal and Bursar will ensure that all staff members are made aware of, and understand, what constitutes a data breach as part of their CPD training.

16.3. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed.

16.4. All notifiable breaches will be reported to the relevant supervisory authority within 72 hours of the school becoming aware of it.

16.5. The risk of the breach having a detrimental effect on the individual, and the need to notify the relevant supervisory authority, will be assessed on a case-by-case basis.

16.6. In the event that a breach is likely to result in a high risk to the rights and freedoms of an individual, the school will notify those concerned directly.

16.7. A 'high risk' breach means that the threshold for notifying the individual is higher than that for notifying the relevant supervisory authority.

16.8. In the event that a breach is sufficiently serious, the public will be notified without undue delay.

16.9. Effective and robust breach detection, investigation and internal reporting procedures are in place at the school, which facilitate decision-making in relation to whether the relevant supervisory authority or the public need to be notified.

16.10. Within a breach notification, the following information will be outlined:

- The nature of the personal data breach, including the categories and approximate number of individuals and records concerned
- The name and contact details of the DPO
- An explanation of the likely consequences of the personal data breach
- A description of the proposed measures to be taken to deal with the personal data breach
- Where appropriate, a description of the measures taken to mitigate any possible adverse effects

16.11. Failure to report a breach when required to do so may result in a fine, as well as a fine for the breach itself.

17. Data security

17.1. Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access.

17.2. Confidential paper records will not be left unattended or in clear view anywhere with general access.

17.3. User accounts are password-protected and data is stored on a network drive that is regularly backed up off-site.

17.4. Where data is saved on removable storage or a portable device, the device will be kept in a locked filing cabinet, drawer or safe when not in use.

17.5. Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted. Such information is accessible securely via Office 365.

17.6. All electronic devices are password-protected to protect the information on the device in case of theft.

17.7. Staff and members of the School Council will not use their personal laptops or computers for school purposes unless they are password-protected.

17.8. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

17.9. Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient.

17.10. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

17.11. When sending confidential information, staff will always check that the recipient is correct before sending.

17.12. Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

17.13. Before sharing data, all staff members will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

17.14. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

17.15. The physical security of the school's buildings and storage systems, and access to them, is reviewed on a termly basis. If an increased risk in vandalism/burglary/theft is identified, extra measures to secure data storage will be put in place.

17.16. Abbots Bromley School takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.

17.17. The Bursar is responsible for continuity and recovery measures are in place to ensure the security of protected data.

18. Photography

18.1. The school understands that recording images of identifiable individual constitutes as processing personal information, so it is done in line with data protection principles.

18.2. The school will always indicate its intentions for taking photographs of students and will retrieve permission before publishing them.

18.3. If the school wishes to use images/video footage of students in a publication, such as the school website, prospectus, or recordings of school plays, permission will be sought for the particular usage from the parent of the student.

18.4. Images captured by individuals for recreational/personal purposes, and videos made by parents for family use, are exempt from the GDPR.

19. Data Retention

19.1. Data will not be kept for longer than is necessary (see Appendix A)

19.2. Unrequired data will be deleted as soon as practicable.

19.3. Some educational records relating to former students or employees of the school may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts.

19.4. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

19.5 Further details can be found in the School's Data Retention Policy.

20. DBS Data

20.1. All data provided by the DBS will be handled in line with data protection legislation; this includes electronic communication.

20.2. Data provided by the DBS will never be duplicated.

20.3. Any third parties who access DBS information will be made aware of the data protection legislation, as well as their responsibilities as a data handler.

Appendix A: Data Protection Retention Period

Type of record	Retention period
SCHOOL-SPECIFIC RECORDS	
• Registration documents of School	Permanent
• Attendance Register	6 years from last date of entry, then archive.
• Minutes of Governors' meetings	6 years from date of meeting
• Annual curriculum	From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)
INDIVIDUAL PUPIL RECORDS NB – this will generally be personal data	
Admissions: application forms, assessments, records of decisions	25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision).
Examination results (external or internal)	7 years from pupil leaving school
Pupil file including:	
• Pupil reports	ALL: 25 years from date of birth (subject where relevant to safeguarding considerations).
• Pupil performance records	
• Pupil medical records	Up to the age of 25 or 26 if treatment after 17. Any material which may be relevant to potential claims should be kept for up to 30 years.
• Special educational needs records (to be risk assessed individually)	Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)
INDIVIDUAL PARENT RECORDS	
Contact details for parents and other next of kin ie emergency contact details	Duration of pupil's time in school (potential to keep beyond if notified accordingly of change of lawful basis for processing personal data.
SAFEGUARDING NB – please read notice at the top of this note	
Policies and procedures	Keep a permanent record of historic policies
DBS disclosure certificates (if held)	No longer than 6 months from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself.
Accident / Incident reporting	Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available.
Child Protection files	If a referral has been made / social care have been involved or child has been subject of a multiagency plan – indefinitely. If low level concerns, with no multi-agency act – apply applicable school low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely)
ACCOUNTING RECORDS	
Accounting records (normally taken to mean records which enable a company's accurate financial position to be ascertained & which give a true and fair view of the company's financial state)	Minimum – 3 years for private UK companies (except where still necessary for tax returns) Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place Internationally: can be up to 20 years depending on local

	legal/accountancy requirements
Tax returns	Minimum – 6 years
VAT returns	Minimum – 6 years
Budget and internal financial reports	Minimum – 3 years
CONTRACTS AND AGREEMENTS Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments) Deeds (or contracts under seal)	Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later Minimum – 13 years from completion of contractual obligation or term of agreement
INTELLECTUAL PROPERTY RECORDS Formal documents of title (trade mark or registered design certificates; patent or utility model certificates) Assignments of intellectual property to or from the school IP / IT agreements (including software licences and ancillary agreements eg maintenance; storage; development; coexistence agreements; consents)	Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years. As above in relation to contracts (7 years) or, where applicable, deeds (13 years). Minimum – 7 years from completion of contractual obligation concerned or term of agreement
EMPLOYEE / PERSONNEL RECORDS NB this will almost certainly be personal data Single Central Record of employees Contracts of employment Employee appraisals or reviews Staff personnel file Payroll, salary, maternity pay records Pension or other benefit schedule records Job application and interview/rejection records (unsuccessful applicants) Immigration records Health records relating to employees	 Keep a permanent record of all mandatory checks that have been undertaken (not certificate) 7 years from effective date of end of contract Duration of employment plus minimum of 7 years As above, but do not delete any information which may be relevant to historic safeguarding claims. Minimum – 6 years Possibly permanent, depending on nature of scheme Minimum 3 months but no more than 1 year Minimum – 4 years 7 years from end of contract of employment
INSURANCE RECORDS Insurance policies (will vary – private, public, professional indemnity) Correspondence related to claims/renewals/ notification re: insurance	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim. Minimum – 7 years
ENVIRONMENTAL AND HEALTH RECORDS Maintenance logs Accidents to children Accident at work records (staff) Staff use of hazardous substances	 10 years from date of last entry 25 years from birth (unless safeguarding incident) Minimum – 4 years from date of accident, but review case-by-case where possible Minimum – 7 years from end of date of use
Risk assessments (carried out in respect of above) Data protection records documenting processing activity, data breaches.	7 years from completion of relevant project, Incident, event or activity. No limit, as long as up to date and relevant 9as long as no personal data held)