

AoC

DfES

LSC

HSE

SHEFE

Safety, Health & Environment in Further Education

Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR)

- Links:**
- a. www.riddor.gov.uk
 - b. www.safelearner.info
 - c. Accident & Incident Management System (AIMS)
 - d. SHEFE Accident Investigation Guide
 - e. RIDDOR – abridged

Guidance author: Jonathan Kerr
 Health and Safety Advisor
 Sir John Deane's College
 Northwich, Cheshire, CW9 8AF
 Tel: 01606 46011 Fax: 01606 353939

Feedback to: Jonathan Kerr kerr.j@sjd.ac.uk

Guidance content:	Page
Subject introduction and overview	2/3
Types of accidents/incidents	3/4
Clarification of reporting requirements	4/5
Instruction/training	6
Case law example	6
Further reading	6
Appendices:	
A. Aide-memoir for RIDDOR reportable incidents	7/8
B. HSE reporting guide and record details required	9
C. What constitutes reportable Injury, Disease or Dangerous Occurrence	10/11
D. Example Accident Reporting policy	12/13
E. RIDDOR Quality Statements Check List	14

1. Introduction and overview of the subject:

- 1.1 The following guidance is designed to inform college employers and employees of the actions required to meet current legislation in respect of the reporting of injuries, diseases and dangerous occurrences arising out of or in connection with work i.e. work covered by the Health and Safety at Work etc. Act 1974. The guide also includes the Learning and Skills Council's (LSC) contractual reporting requirements, applicable to all LSC funded organisations.
- 1.2 Employers, the self-employed and persons in control of premises have statutory duties to report certain accidents and incidents under Regulations 3, 4 and 5 of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). For colleges in the Further Education sector all such reports are to be made to the Health and Safety Executive (HSE), without delay or within 10 days, subject to the type of incident being reported - see section 2 below and the reporting aide-memoir at **Appendix A**.
- 1.3 Employers must make and maintain appropriate records of all RIDDOR reportable incidents. They must also record accidents resulting in harm to employees at work in accordance with the Social Security (Claims and Payments) Regulations 1979 and the Social Security Administration Act 1992. Systems available for record keeping include:
- HSE Report Forms F2508 and F2508A;
 - Statutory Accident Book (2003 version);
 - Accident and Incident Management System (AIMS), developed by the AoC;
 - Learner Incident Management System (LIMS), developed by the LSC;
 - Internal record keeping systems, computer or paper based, as may be introduced by colleges.

Records made under RIDDOR must be maintained for at least 3 years and all are subject to the requirements of the Data Protection Act 1998.

- 1.4 Incident records help identify trends and indicate where and how risks arise. They also help determine the adequacy of existing health and safety arrangements and employee understanding. Should an incident lead to civil or criminal action in law, it will be necessary to produce the appropriate records at an early stage. The record details to be maintained under RIDDOR are listed in **Appendix B** to this guide.
- 1.5 Employees and learners should report, as soon as possible and in accordance with college procedures, any work or learning-related accident (including violence), dangerous occurrences or the diagnosis of a disease arising out of or in connection with work. Management should ensure this is clearly communicated during induction programmes and reinforce the requirement via some other suitably accessible reference medium e.g. workplace policy or procedure, student handbook etc.
- 1.6 Notwithstanding any statutory or other requirement, it is vital that all significant incidents are communicated to management promptly in order that appropriate action may be taken. This may include action to prevent further harm, preservation of the accident scene, witness identification, reporting to the appropriate authorities and formal investigation.

1.7 Accident reports are to be treated as confidential, in accordance with the requirements of the DPA 1998, and are only to be made available to those entitled to see them. In this respect, the following may, normally, have access to relevant reports:

- a. the person completing and/or handling the report in the first instance;
- b. the Line Manager with responsibility for the person harmed or for the premises, plant, equipment, process, work method etc. that caused the harm;
- c. the nominated competent person, normally the Health and Safety Advisor;
- d. the employer i.e. Board of Governors/ Senior Management Team;
- e. the enforcing authority i.e. the Health and Safety Executive;
- f. the Law Courts and legal representatives, in accordance with existing rules and procedures.

2. Types of accident or incident:

2.1 Accidents and incidents are generally classified as follows:

- **Trivial or minor accidents** - a cut or nipped finger, a bruise from banging into something. Unless such injuries also fall into one of the categories below, they are **not** RIDDOR reportable, but they should be communicated to an appropriate person, recorded in the workplace Accident Book and, so far as reasonably practicable (SFARP), action taken to eliminate or minimize any further risks of harm;
- **Over three day injuries** – these are incidents that do not amount to major injury accidents (see below) but are connected with work and include acts of physical violence. If, as a consequence of such an incident, an employee, or self-employed person working on the premises, suffers an injury and is thereby unable to work **or** is unable to do their full range of duties for more than 3 consecutive days, the matter must be reported, within 10 days, to the enforcing authority.

Note: The day of the accident does not count in the three-day calculation but rest days and/or weekends, which may fall within the 3 days, do. For example: If an accident occurs on a Thursday, Friday would be day 1 and Sunday would be day 3, even if the person did not work Saturdays or Sundays. If the person was not fit for work the following Monday, day 4, the accident is an over three day incident and becomes RIDDOR reportable.

These incidents, and those that follow, must be reported to the enforcing authority (and to the LSC if a learner is harmed), appropriately recorded, investigated and, SFARP, action taken to eliminate or minimise the risks of further harm.

- **Major injury accidents** – e.g. broken leg, amputation, dislocation of the shoulder etc. See **Appendix C** below for a detailed list of what constitutes ‘major injury’. All major injuries, including those arising from acts of physical violence, to employees at work, or self-employed persons working on the premises, are RIDDOR reportable.
- **Fatality** - the death of **any** person, whether or not at work, must be reported, without delay, to the enforcing authority if the death results from an incident, including physical violence, arising out of or in connection with work. This includes a death occurring some time after, but within 1 year of, the incident.

- **Work-related disease** – e.g. work-related upper limb disorders, occupational asthma or dermatitis etc. The disease is only reportable if the employer is notified, in writing, by the sufferer's doctor and the disease is listed in Schedule 3, Part 1, column 1 of RIDDOR and the affected employee's current job involves a corresponding work activity specified in column 2 of that Schedule. It is not intended to recreate the details of Schedule 3 in this guide as it would be more appropriate to refer directly to the Schedule in the Approved Code of Practice. However, some of the more common diseases are listed at **Appendix C** below. Applicable diseases must be reported without delay.
- **Dangerous Occurrence** e.g. collapse of scaffold, fire stopping plant for more than 24 hours etc. See **Appendix C** below for a detailed list of RIDDOR reportable dangerous occurrences. Such incidents must be reported without delay.

3. Clarification on reporting requirements

- 3.1 All workplace accidents are to be reported, at one level or another, dependant upon the nature and/or severity of the harm sustained. An entry in the Accident Book may be sufficient in minor cases. However, where a person is: subjected to violence, unable to work or undertake their full range of duties for more than 3 days, taken to hospital for treatment, diagnosed with a work-related disease or seriously injured or killed, the matter must also be reported to the appropriate enforcing authority. For the purpose of reporting, the HSE has established a national Incident Contact Centre (ICC), the details of which are at the top left of **Appendix A** below.
- 3.2 RIDDOR reportable incidents involving learners, arising out of any LSC funded learning programme, including work placements, are to be reported to the Local LSC Office, or to the National Office if the former cannot be contacted. The initial report should be made by telephone followed up, within 10 working days, by a completed Learner Incident Record (LIR).
- 3.4 **Injury caused by Acts of Violence:** Acts of physical violence are to be reported in the same way as over 3 day, major or fatal accidents. Psychological reactions to violence are not reportable. Thus, if an employee is off sick for four days with a sprain, as a result of coping with a violent person at work, this will need to be reported to the HSE. If the employee was not physically harmed but was off work because of stress brought on by the incident, it would not be reportable.
- 3.5 **Death within a Year of an Accident:** If an injury, arising out of or in connection with work, leads to an employee's death within a year of the accident, it is reportable as soon as the information becomes known. If the death occurs more than 1 year after the accident/incident, it is not reportable.
- 3.6 **Dangerous Occurrences and Prescribed Diseases of Employment:** For a clearer understanding of which dangerous occurrences and diseases come under RIDDOR, refer to the **Appendix C** below, or to the Approved Code of Practice.
- 3.7 **Arising out of or in Connection with Work:** This phrase is crucial in deciding whether or not an accident or dangerous occurrence is reportable under RIDDOR:
- 3.7.1 For employees it means the person was, at the material time, carrying out the duties for which he/she was employed and was injured as a consequence of an unsafe act or unsafe

condition in the manner of conducting the work, of the plant or substance used at work and/or the condition of the premises.

- 3.7.2 For non-employees such as visitors or students, it means that their injuries are attributable to the work organisation (e.g. by a teacher), or any plant, equipment or substance or the condition of the premises. Reportable examples: A visitor slips on a wet floor, is injured and is taken to hospital. During teaching, a student is overcome and rendered unconscious by fume from a process.
- 3.8 **Contractors:** The injured person's own employer has the legal duty to report employee accidents to the appropriate authority. However, if the contractor is self-employed, the person in control of the premises, or part of the premises, where the incident occurred must make the report. In all cases the institution (college) must ensure cooperation and the sharing of information between the parties i.e. check the main contractor or injured person's employer knows about the accident. If any doubt arises, the college should report the incident to the enforcing authority.
- 3.9 **Accidents on Educational Visits and Work Experience Placements:** Accidents to students or staff whilst taking part in off-site activities need to be reported in the same way as if they occurred on college premises, notwithstanding the fact that those in charge of the premises visited, or the work placement provider, has the legal duty to report accidents arising out of or in connection with their undertakings. Depending upon the location and type of establishment being visited, staff should assist the provider complete their Accident Book, if requested to do so.
- 3.10 **Accident Report Book:** Statutory 'Accident Books' (2003 version) are published by The Stationery Office (TSO), ISBN 0 11 703164X, and are available from TSO outlets and accredited agencies. College employers are required to make an accident book available for use by employees, students, visitors and self-employed contractors in order that they may report any accident they may have on site. The record may also be made by someone acting on behalf of the injured person. The accident book is a requirement under the Social Security (Claims and Payments) Regulations 1979 in case of a claim for industrial injury benefit.
- 3.11 The law requires that employees tell their employer, as soon as practicably possible, the details of any accident arising out of or in connection with work. This must be done whatever the cause or seriousness of the accident and includes acts of violence. The Accident Book may be used for this purpose and by doing so the employee will protect their right to benefit and help ensure a safer workplace.
- 3.12 **College Accident Record Systems:** Many colleges develop their own reporting systems and accident etc. report forms in order to obtain more detail than the Statutory Accident Book requires. Such systems may also include space for action taken to prevent further harm and outcomes of any subsequent investigation. Where such systems are used, institutions should ensure they are handled in accordance with the Data Protection Act and that adequate information, instruction and training is given to employees in respect of their use.
- 3.13 **Accident Investigation:** Accident investigation is a vital response to accidents and incidents that cause or could have caused harm or ill health. Accident investigation is the subject of separate guidance, a link to which is provided at the top of this guide.

4. Instruction/ Training:

- 4.1 Colleges should ensure that appropriate instruction/training is provided for all staff and students. This may be achieved through induction programmes, periodic refresher training, written policy and procedures, staff and student handbooks etc. Others who may also be affected (e.g. temporary workers, visitors and contractors etc) should receive instruction appropriate to their needs. This may be achieved through induction programmes, briefings, included in site rules or printed on visitor's passes etc.

5. Case law – example:

Woking Borough Council v BHS plc - 1994

Woking Borough Council prosecuted BHS plc for failing to report an accident involving a customer under RIDDOR. The Magistrates' Court held that it was not necessary for accidents to members of the public to be reported in this way and the case was dismissed. Woking B.C. appealed and the court ruled that as Regulation 3 of RIDDOR refers to 'any person', the duty to report an accident extends to visitors, customers and other invitees to the premises in addition to employees, the self-employed and those undergoing training for employment. The case was remitted to the justices. This makes clear that RIDDOR cannot be confined, in its application, to those who are employed, but that reference to 'any person' must be interpreted literally.

6. Policy example:

See appendix D.

7. Risk assessment – example:

Not applicable for this subject

8. Safe system of work – example:

Not applicable for this subject

9. Quality Statements Checklist:

See appendix E.

10. Further reading:

- a. The Management of Health and Safety at Work Approved Code of Practice L21 2000 ISBN 0 7176 2488 9.
- b. A Guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 L73 2000 ISBN 0 7176 2431 5.
- c. RIDDOR explained HSE 31(rev1) 1999 HSE Books.
- d. Reporting of school accidents EDIS 1 1997.
- e. LSC web-based guidance for incidents involving Learners.

Aide-Memoir for reporting incidents and accidents**Appendix A****Health and Safety Executive (HSE)**

Telephone: 0845 300 9923 (Out of Hours 0151 9229235)

Internet: www.riddor.gov.uk

Facsimile: 0845 300 9924

Post: Incident Contact Centre (ICC)
Caerphilly Business Park
Caerphilly CF83 3GG**National Learning and Skills Council (LSC) Office**

Telephone: 0845 019 4170 (for National Learner H&S Advisor)

Internet: www.safelearner.info (for further details)e-mail: jill.joyce@lsc.gov.ukPost: LSC National office (WBL Team)
Cheylesmore House, Quinton Road
Coventry, CV1 2WT

Type of incident	Responsible person	When to report	Report to	How to report
Any Minor accident arising out of or in connection with work, involving employees, learners or visitors to the premises. See also below:	a. The person involved or b. Person acting on behalf of the injured person i.e. Line Manager, teacher etc.	As soon as possible.	The employer via Line Manager, Reception or H&S Advisor if appropriate. Learners and visitors should report to the person in charge of the activity or to Reception.	a. Verbally and b. Record the details in the appropriate College Accident Book.
Over 3 Day Accidents arising out of or in connection with work, including acts of violence.	a. Employer or person in control of the premises. The actual function of reporting may be undertaken by the employer's nominee e.g. Senior Manager, H&S Advisor or HR personnel.	As soon as practicable but within 10 days.	a. The enforcing authority (HSE) and, if a learner b. The Local LSC Office	a. Telephone or e-mail the ICC or use Form 2508 and fax', e-mail or post. b. Report by telephone then fax, e-mail or post LIR and copy of the F2508 to LLSC.
Taken from site to a hospital for treatment - non employee i.e. learner or visitor, following an accident arising out of or in connection with work.	a. Person in control of the premises i.e. Senior Manager, Duty Officer etc. or other nominated, available person e.g. H&S Advisor.	Without delay i.e. forthwith by the quickest practicable means e.g. telephone.	a. The enforcing authority (HSE) and, if a learner b. The Local LSC Office	a. Telephone or e-mail the ICC. Follow up with F2508 if necessary. b. Report by telephone then fax, e-mail or post LIR and copy of the F2508 to LLSC.

Continued on next page:

Continued:**Appendix A cont'**

Type of incident	Responsible person	When to report	Report to	How to report
Death or Major Injury arising out of or in connection with work, including acts of violence. See appendix C.	a. Employer or person in charge of the premises	Without delay i.e. forthwith by the quickest practicable means e.g. telephone.	a. The enforcing authority (HSE) and, if a learner b. The Local LSC Office	a. Telephone or e-mail the ICC or use Form 2508 and fax', e-mail or post. b. Report by telephone then fax, e-mail or post LIR and copy of the F2508 to LLSC.
Dangerous Occurrence arising out of or in connection with work. See appendix C.	Employer or person in charge of the premises	Without delay i.e. forthwith by the quickest practicable means e.g. telephone.	a. The enforcing authority (HSE) and, if a learner b. The Local LSC Office	a. As above. b. As above.
Work-related Disease See appendix C.	Employer - as soon as the disease is notified by a Medical Practitioner	Without delay i.e. forthwith by the quickest practicable means e.g. telephone.	a. The enforcing authority (HSE) and, if a learner b. The Local LSC Office	a. As above b. As above but use Form F2508 <u>A</u> .

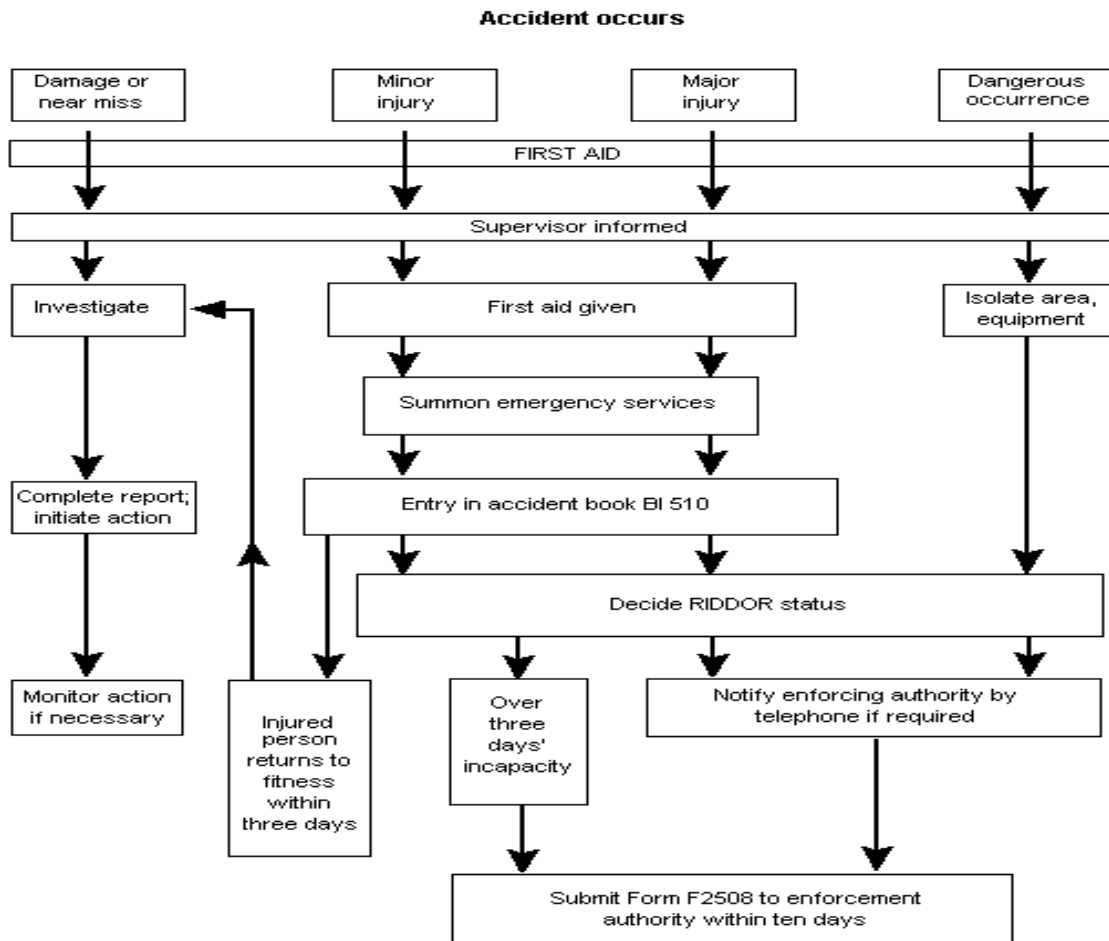
Local Learning and Skills Council (LLSC) Office**Telephone:****E-mail:****Facsimile:****Postal****address:****Note:**

- a. To telephone the HSE outside working hours (Mon to Fri, 8:30am to 5pm), use the Out of Hours number above.
- b. If unable to reach your Local LSC Office you may report incidents, especially fatalities or serious injuries, to the National Office. Contact details above.

This aide-memoir may be distributed internally once the details of the Local LSC Office has been added to the box above. First copy and paste the two pages to your own computer system and adapt as required.

Appendix B

HSE Accident Reporting Aide-memoir

**B1. The Record information required for reportable accidents and dangerous occurrences:**

- the date and time of the injury/incident;
- the nature of the injury/incident;
- the place where the injury/incident occurred;
- a brief description of the circumstances;
- personal details of the person(s) harmed, including full names, addresses and occupations.

B2. The Record information required for specified diseases:

- Date of diagnosis;
- Name and occupation of the person involved;
- Name and nature of the disease;
- Date and method of reporting the incident to the enforcing authority.

Appendix C**Clarification of what constitutes a Major Injury, Dangerous Occurrence or Occupational Disease for the purposes of RIDDOR****C1. Major Injuries:**

1. Any fracture (other than to the fingers, thumbs or toes).
2. Any amputation.
3. Dislocation of the shoulder, hip, knee or spine.
4. Loss of sight (whether temporary or permanent).
5. A chemical or hot metal burn to the eye, or any penetrating injury to the eye.
6. Any injury resulting from an electric shock or electrical burn (including any electrical burn caused by arcing or arcing products) leading to unconsciousness or requiring resuscitation or admission to hospital for more than 24 hours.
7. Any other injury:
 - leading to hypothermia, heat-induced illness or to unconsciousness;
 - requiring resuscitation; or
 - requiring admission to hospital for more than 24 hours.
8. Loss of consciousness caused by asphyxia or by exposure to a harmful substance or biological agent.
9. Either of the following conditions which result from the absorption of any substance by inhalation, ingestion or through the skin:
 - acute illness requiring medical treatment, or
 - loss of consciousness.
10. Acute illness which requires medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.

C2. Dangerous Occurrences:

1. The collapse or overturning of any lifting equipment (lifts, hoist, crane, access cradles, fork lift trucks, excavator, pile driver or rig over 7 meters high), or failure of any load bearing part.
2. The failure of any pressure system, e.g. boilers, compressors, autoclaves, vacuum vessels.
3. The failure of any load bearing part of a freight container while moving a container.
4. Accidental contact with overhead electric lines over 200v or causes a discharge from such a line by coming into close proximity with it.
5. Electrical short circuit or overload causing fire or explosion which results in the stoppage of the plant for more than 24 hours or which had the potential to cause death.
6. Accidental ignition of explosives.

7. The escape, or potential escape, of biological agents likely to cause severe disease in humans.
8. The malfunction of radiation generators.
9. The malfunction of breathing apparatus during or immediately before use.
10. Any incident relating to diving operations which could have put divers at risk.
11. Scaffolding collapse.
12. Train collisions.
13. Dangerous incidents at wells (other than water).
14. Dangerous incidents involving pipelines or their works.
15. Dangerous incidents involving fairground equipment.
16. Dangerous incidents involving dangerous substances carried by road.
17. Accidental collapse of buildings or structures.
18. Explosion or fire closing the premises for more than 24 hours.
19. Escape of substances which may harm health.
20. Escape of flammable substances.

C3. Occupational Diseases

There are over 45 diseases listed in Schedule 3 of RIDDOR. To be reportable to the HSE there must be a link between the disease and the nature of work a person does which exposes him or her to a higher than normal risk of contracting the disease. To warrant notification, the diagnosis of the disease must be made by a medical practitioner. If a potential case arises, reference to the ACoP or HSE website is recommended and advice sought from an Occupational Health Unit. Occupational diseases which may be encountered are summarised below:

1. Conditions due to physical agents and the physical demands of work e.g. limb disorders caused by repetitive movements, constrained posture or vibration.
2. Infections due to biological agents e.g. hepatitis, legionellosis, leptospirosis, lymes disease, tetanus, Q fever, tuberculosis.
3. Poisonings from particular substances or their compounds.
4. Specific illnesses related to particular industrial processes.
5. Respiratory diseases related to dusts etc, e.g. mesothelioma from handling asbestos, cancer from hardwood dust.
6. Occupational dermatitis.
7. Occupational asthma from work involving exposure to particular agent e.g. soldering flux, wood dust and others.

Appendix D**Policy – example:****Accident and Incident Reporting Policy**

1. It is college policy to report all work-related accidents, diseases and dangerous occurrences to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). We will also record injuries in the Accident Book, as required by the Social Security (Claims and Payments) Regulations (as amended).
2. The enforcing authority for this institution in respect of RIDDOR is the Health and Safety Executive.
3. The college will also report RIDDOR reportable accidents and incidents involving learners on Learning and Skills Council (LSC) funded training courses, including work placement, to the appropriate Local LSC Office, in accordance with the Learner Incident Management System (LIMS).
4. The person responsible for reporting incidents to the HSE and LLSC is the Health and Safety Advisor or, in his/her absence, a Senior Manager or other person acting explicitly on their behalf.
5. Accidents and incidents that are reportable to the enforcing authority may also be reported to the college employer's liability insurer.
6. Employees and learners must report all injuries to their manager, supervisor, teacher or to the college reception without delay, but after treatment if so required. The recipient of the report is then to ensure that significant incidents are communicated, without undue delay, to Senior Management and/or the Health and Safety Advisor.
7. An Accident Book will be kept at Reception for use by staff, learners, self-employed contractors and visitors etc. who may be harmed whilst on our premises. The Accident Book must be fully completed and forms handled in accordance with the requirements of the Data Protection Act.
8. If, because of their injury, employees or others are incapable of making an immediate entry, the entry may be made by someone acting on their behalf e.g. their manager, supervisor, teacher, first-aider or Receptionist.
9. Following any significant accident or dangerous occurrence, the person responsible for the area or activity when the incident occurred is to:
 - ensure injured persons receive appropriate medical attention;
 - if an injury is of a serious nature or if there is any doubt, the injured person should be sent to the nearest hospital for treatment;
 - take reasonable action to prevent similar occurrences;
 - report the incident to management in accordance with current instructions;
 - complete, without delay, an accident report and submit to management;
 - assist with any follow-up investigation.

10. Following any significant accident, the nominated, competent person (e.g. Health and Safety Advisor) should take witness statements and retain any other evidence related to the accident, such as work equipment, containers (with contents listed), inspection and test logs, risk assessments, safe systems of work, photographs etc.
11. The responsible person (Senior Manager or Health and Safety Advisor) will notify the enforcing authority, and the LLSC when appropriate, of reportable incidents in accordance with RIDDOR and LIMS.
12. The Health and Safety Advisor will maintain centralised records of all reportable incidents, in an approved manner, for a minimum of 3 years. Access to such records is to be controlled in accordance with the requirements of the Data Protection Act. The Accident and Incident Management System (AIMS), developed by the Association of Colleges, is approved for college use.
13. Detailed reporting procedures are to be available to all staff on the college Intranet and in hard copy format at Reception and other appropriate locations for ease of reference.

Appendix E

RIDDOR CHECK LIST

	Quality Statements to be assessed	Yes/No
1	An appropriate policy and procedures for accident etc. reporting have been documented and communicated to all staff and others who may be affected.	
2	The policy and procedures are readily available to all who may need to refer them and are reviewed regularly and updated as and when appropriate.	
3	All staff, students and others as appropriate, have received adequate training/instruction in respect of accident etc. reporting.	
4	Those with specific duties for ensuring reporting to the HSE and LLSC are competent and are identified in the policy or other appropriate medium i.e. job description.	
5	The LSC Learner Incident Management System has been integrated with college accident etc. reporting procedures.	
6	Accident statistics are recorded through the use of an approved system, i.e. the AoC Accident and Incident Management System, and are regularly reviewed by Senior Management.	
7	Accident Books are readily available for use by staff, students, sub-contractors and visitors.	
8	F2508, F2508A and LIR forms are readily available for those who need to use them.	
9	All RIDDOR reportable incidents are reported to the HSE without delay and, when required, followed up by F2508/F2508A as applicable.	
10	All RIDDOR reportable incidents involving learners are reported, in accordance with LIMS, to the Local LSC office.	
11	Accident Books are checked regularly and completed accident forms are handed to the responsible person.	
12	All accident etc. records are handled in accordance with the requirements of the Data Protection Act and retained for 3 years.	
13	Spare	
14	Spare	

If the answer to any of the above statements is, "No", list below the action required:

Action required	By whom?	By when?

Audit undertaken by:.....on: / / 200 .