

## CAPEL PARISH CONICL – DATA AUDIT REPORT

Date Completed: (date)

Clerk/Responsible Officer:

Reviewed by: Full Council (date)

### OVERVIEW

This data audit sets out how Capel Parish Council processes personal data in the course of its duties and functions. It is designed to ensure compliance with

### DATA INVENTORY TABLE

| Date Category               | What Personal Data?                        | What It Relates To               | Purpose                             | Lawful Basis                  |
|-----------------------------|--|----------------------------------|-------------------------------------|-------------------------------|
| Council Minutes and Agendas | Names, roles, public comments              | Councillors, public              | Governance, public records          | Legal Obligation              |
| Planning Comments           | Name, address, comment content             | Residents                        | Responding to planning applications | Public Task                   |
| Hall Hire                   | Name, contact details, payment information | Hirers                           | Booking and invoice                 | Contract                      |
| Allotment Tenancy           | Name, contact details, payment information | Tenants/plot holders             | Invoice                             | Contract                      |
| Burial Ground               | Name, contact details, payment information | Immediate family, relatives      | Invoice and data entry              | Contract                      |
| Staff Records               | Name, address, payroll data, appraisals    | Employees                        | Employment                          | Legal Obligation and Contract |
| Email Enquiries             | Name, contact information, content         | General public                   | Responding to queries               | Legitimate interest           |
| Finance                     | Name, payment details                      | Staff, residents and contractors | To make and receive payments        | Legitimate interest           |

## DATA PROCESSORS (EXTERNAL PARTIES)

| Processor                              | Purpose   | Data Shared                                   | DPA in Place? (Data Processing Agreement)   | Other info  |
|--|---|---|---|---|
| Payroll Provider – Roberts Payroll     | Monthly payroll                                 | Employee details                              | Yes and in place until terminated   |   |
| HMRC                                   | Statutory reporting                             | Employees pay, tax and Employers NIC          | No PDA required. The Council shares employee data with HMRC for payroll, tax and pension purposes. HMRC acts as a data controller under relevant UK tax legislation. Article 6(1)(c) – Legal obligation   |   |
| Website host                           | Council website                                 | Public documents                              | Yes and in place until terminated<br><a href="https://www.Capel-pc.gov.uk">https://www.Capel-pc.gov.uk</a>  |   |
| Email Provider (Outlook/Microsoft)     | Communication                                   | Emails  | <a href="https://www.capel-pc.gov.uk">https://www.capel-pc.gov.uk</a>   |   |
| External Auditors – PKF Littlejohn LLP | Financial audit                                 | Invoices, pay, contacts                       | Data shared with the appointed external auditor (PKF Littlejohn LLP) as part of statutory audit requirements under the Local Audit and Accountability Act 2014. PKF Littlejohn acts as an independent data controller. PKF Littlejohn publishes their own privacy notice. | <a href="https://www.pkf.l.com/data-protection-privacy-notice/">https://www.pkf.l.com/data-protection-privacy-notice/</a> |
| Internal Auditor – Mulberry LAS        | Internal audit of council governance, financial | Includes access to payroll, personnel details | Yes, and in place until March 2026  |   |
| Mole Valley District Council           | Governance, planning, assistance with queries   | Contact details – names, addresses, emails    | Yes, and in place until terminated  |   |
| Surrey County Council                  | Assistance with resident queries                | Contact details – names, addresses, emails    | <a href="https://www.curreycc.gov.uk/council-and-democracy/your-privacy/corporate-private-notice">https://www.curreycc.gov.uk/council-and-democracy/your-privacy/corporate-private-notice</a>   |   |

|   |                 |  |  |  |
|---|-----------------|--|--|--|
| NatWest, National Savings and Investments | Council banking | Account names, numbers, councillors and staff identity documents and personal identification details | Banks act as data controllers, deciding how and why they process personal data (e.g. Identity checks, account management). The Council provides necessary personal data (e.g. signatory details) for the bank's lawful purposes, not under the Council's instruction. Therefore, under UK GDPR, no Data Processing Agreement is required. The council will share only necessary data, keep a record of what is shared and why and use banks with appropriate data protection measures. |  |
|---|-----------------|--|--|--|

## SECURITY MEASURES

- Daily backups
- Paper files stored in locked cabinet
- Anti-virus and firewall protection
- Limited access to personal data internally

## DATA SUBJECT RIGHTS

Capel Parish Council recognises and facilitates individuals' rights under UK GDPR including:

- Right to access
- Right to rectification
- Right to erasure (where applicable)
- Right to data portability (where applicable)
- Right to object
- Right to lodge a complaint with the ICO

Data subject requests should be made in writing to the Clerk and will be responded to within one month.

## NEXT STEPS AND RECOMMENDATIONS

- Review consent procedure (especially mailing list)
- Annual data protection training for staff and councillors
- Endure all third-party processors have up-to-date agreements
- Conduct DPIAs (Data Protection Impact Assessments)<sup>1</sup> for any new high-risk processing
- Maintain an incident log for data breaches

## SUPPORTING DOCUMENTS

- Completed Data Audit Template
- Privacy Notice (Public)
- Data Protection Policy
- Document Retention Policy
- Consent Form (if applicable)
- Data Breach Procedure
- Data Protection Impact Assessment template

**The UK GDPR and Data Protection Act 2018, promote transparency and support accountability.**

| How its Collected                    | How its Stored                              | Retention Period                        | Shared With   |
|--------------------------------------|---|---|---|
| Directly at meetings or submissions  | Website, secure cloud storage and hard copy | Indefinite (archive)                    | Public via website                                      |
| Email and/or post                    | Secure cloud and hard copy                  | 6 years                                 | MVDC and/or SCC Planning                                |
| Hall hire information                | Secure cloud and hard copy                  | 6 years (financial)                     | N/A   |
| Email and/or post                    | Locked office and secure cloud storage      | Until unsubscribed or completed project | MVDC and/or SCC   |
| Directly from staff                  | Locked file and secure cloud storage        | 6 years post-employment                 | Payroll provider, HMRC, Auditor                         |
| Email                                | Secure cloud storage/email server           | 1 year                                  | Councillor, MVDC and SCC if necessary to resolve query  |
| Directly from person or via the bank | Secure cloud storage, hard copy             | Until no longer needed or 6 years       | Councillors for authorisation and monitoring. Auditors. |

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<sup>1</sup> A Data Protection Impact Assessment is a process that helps you assess, manage, and minimise the privacy risks associated with any processing of personal data that's likely to result in a "high risk" to people's rights and freedoms.