

CAPEL PARISH CONCL – 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 https://www.Capel-pc.gov.uk	
Email Provider (Outlook/Microsoft)	Communication	Emails	https://www.capel-pc.gov.uk	
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.	https://www.pkf.l.com/data-protection-privacy-notice/
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	https://www.curreycc.gov.uk/council-and-democracy/your-privacy/corporate-private-notice	

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.	
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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)¹ 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)
- Date 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.

¹ 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.