

Date Completed: 20 March 2026

Clerk/Responsible Officer: Gaynor White

Reviewed By: Full Council 23 March 2026

1. Overview

This data audit sets out how Worplesdon Parish Council processes personal data in the course of its duties and functions. It is designed to ensure compliance with the UK GDPR and Data Protection Act 2018, promote transparency, and support accountability.

2. Data Inventory Table

Data Category	What Personal Data?	Who It Relates To	Purpose	Lawful Basis	How It's Collected	How It's Stored	Retention Period	Shared With
Council Minutes & Agendas	Names, roles, public comments	Councillors, public	Governance, public record	Legal Obligation	Directly at meetings or submissions	Website, Secure cloud storage and hard copy	Indefinite (archival)	Public via website
Planning Comments	Name, address, comment content	Residents	Responding to planning applications	Public Task	Email/post	Secure cloud storage, hard copy	6 years	GBC Planning
Staff Records	Name, address, payroll data, appraisals	Employees	Employment	Legal Obligation & Contract	Directly from staff	Secure cloud storage, locked file	6 years post-employment	Payroll provider, HMRC, Auditor
Staff Records	Medical information	Employees	Employment, H&S	Special category	Directly from staff, medical practitioners and HR Consultants	Secure cloud storage, locked file	7 years post-employment	Payroll provider, HR Consultants
Email Enquiries	Name, contact info, content	General public	Responding to queries	Public Task	Email	Secure cloud storage/email server	1 year	Councillors, GBC and SCC if necessary to resolve query
Phone Enquiries	Name, contact info, content	General public	Responding to queries and the reporting of H&S issues	Public Task	Verbally	Paper copy	21 years (paper copy only for H&S issues in locked cupboard)	HSE, police, insurer if necessary
Electoral Roll	Name, address	Residents of the Parish	Public record	Public Task	Email [Egress]	Secure cloud storage	1 year	Not shared.
Council Chamber hire, land/open spaces hire, events, grass cutting-post licences	Name, address	Residents and hirers	Booking and invoices	Contract	Hire form/email/letter	Secure cloud storage/locked cupboard	6 years	Not shared.
Contracts	Name, address, bank details	Contractors	Service provision	Contract	Tender, contract	Secure cloud storage/locked cupboard	6 years after completion of contract	Not shared.
Finance	Name, Payment details	Staff, residents and contractors	To make and receive payments	Public Task	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
Event Photos	Name	Staff, residents and event attendees	To promote parish council activities	Legitimate Interest	Clearly at events (Parish Council official photographer)	Website, cloud, hard copy (on occasion)	Until no longer needed	Public

3. Data Processors (External Parties)

Processor	Purpose	Data Shared	DPA in Place? (Data Processing Agreement)	Other info
Payroll Provider - Mulberry Local Authority Services Ltd	Monthly payroll	Employee, tax details, pension details	Yes, and in place until terminated	
HMRC	Statutory reporting	Employee pay/tax	No DPA 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 - Welland Creative	Council website	Public documents	Yes, and in place until terminated.	
Domain name hosts - X-Net	Domain name (.gov.uk)	DNS records	Yes, and in place until terminated.	
Email Provider (e.g. Outlook/Microsoft)	Communication	Emails	https://www.microsoft.com/licensing/docs/view/microsoft-products-and-services-data-protection-addendum-dpa?utm_source=chatgpt.com	

External Auditors - PKF Littlejohn LLP	Financial audit	Invoices, pay, contracts	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 (see neighbouring cell).	https://www.pkf-l.com/data-protection-privacy-notice/
Internal Auditor - Mulberry LAS	Internal audit of council governance, financial systems, and compliance,	Including access to payroll, personnel, and payment records	Yes, and in place until 31 March 2027.	
Cloudy IT	Computer backup and support	All electronic information	Yes, and in place until terminated.	
Guildford Borough Council	Governance, planning, assistance with queries	Contact details - names, addresses, emails	dpo@guildford.gov.uk	https://guildford.gov.uk/article/21431/The-Data-Protection-Team
Breakthrough Communications	GDPR/FOI/SARS	Contact details - names, addresses, emails	hello@breakthroughcomms.co.uk	
Surrey County Council	Assistance with residents' queries	Contact details - names, addresses, emails	DPO@surreycc.gov.uk	https://www.surreycc.gov.uk/council-and-democracy/your-privacy/corporate-privacy-notice
Scribe	Council Accounting System	Contact details - names, addresses, emails, telephone numbers, bank details	privacy@scribeaccounts.com	https://www.scribeaccounts.com/privacy-policy
LGPS (Local Government Pension Scheme)	Monthly pension payments	Employee details	DPO@surreycc.gov.uk	https://www.surreycc.gov.uk/council-and-democracy/your-privacy/corporate-privacy-notice
Cambridge Building Society, Co-operative Bank, Metro, Nationwide, Skipton, Unity Trust Bank	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.	

4. Security Measures

Password-protected cloud storage and email accounts

Daily backups

Paper files stored in locked cabinet/locked room

Anti-virus and firewall protection

Limited access to personal data internally

Annual review of IT and data handling procedures

5. Data Subject Rights

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

Right to access

Right to rectification

Right to erasure (where applicable)

Right to restrict processing

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.

6. Next Steps & Recommendations

Annual data protection training for staff and councillors

Ensure all third-party processors have up-to-date agreements

Conduct DPIAs for any new high-risk processing

Maintain an incident log for data breaches

7. Supporting Documents

Prepared

Completed Data Audit Template

Privacy Notice (Public)

Data Protection Policy

Document Retention Scheme

Consent form (if applicable)

Data Breach Procedure

Data Processor Agreements (or confirmations)

Data Protection Impact Assessment template

Approved by Full Council Date 23 March 2026

To be reviewed 01 March 2027