# West Itchenor Parish Council – Data Audit Report

**Date Completed:** 1 November 2025
**Clerk/Responsible Officer:** Carol Smith
**Reviewed By:** Full Council **10 November 2025**

## 1. Overview

**This data audit sets out how West Itchenor 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 |
| **Email Enquiries** | Name, contact info, content | General public | Responding to queries | Legitimate Interest | Email | secure cloud storage/email server | 1 year | Councillors, GBC and SCC if necessary to resolve query |
| **Newsletter Mailing List** | Name, email address | Residents | Community engagement | Consent | Online signup | Mailpoet (or similar) | Until unsubscribed | Mailpoet (data processor) |
| **Finance** | Name, Payment details | Staff, residents and contractors | To make and receive payments | Legitimate Interest | 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 |

## 3. Data Processors (External Parties)

| Processor | Purpose | Data Shared | DPA in Place? (Data Processing Agreement) | Other info |
|---|---|---|---|---|
| Payroll Provider - DCK Payroll | Monthly payroll | Employee 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 - Parish Council Websites | Council website | Public documents | Yes and in place until terminated | |

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|---|---|---|---|---|
| Email Provider (e.g. Outlook/Microsoft) | Communication | Emails | https://westitchenorparish.gov.uk/wp-content/uploads/2025/11/MicrosoftProductandServicesDPAWWEnglishApril2025CR.pdf | |
| External Auditors - MooreLLP | Financial audit | Invoices, pay, contracts | Data shared with the appointed external auditor (Moore LLP) as part of statutory audit requirements under the Local Audit and Accountability Act 2014. Moore LLP acts as an independent data controller. Moore LLP publishes their own privacy notice | |
| Internal Auditor - Mulberry LAS | Internal audit of council governance, financial | Including access to payroll, personnel, and | Yes and in place until terminated | |
| Chichester District Council | Governance, planning, assistance with queries | Contact details - names, addresses, emails | Yes and in place until terminated | |
| West Sussex County Council | Assistance with resident queries | Contact details - names, addresses, emails | https://www.westsussex.gov.uk/about-the-council/information-and-data/data-protection/privacy-notices/ | |
| Easy PC Accounts | For Accounts and bookings | Contact details - names, addresses, emails, telephone numbers | Yes and in place until terminated | |
| Barclays 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. | |
| Docusign | | | | |

## 4. Security Measures

Password-protected cloud storage and email accounts

Weekly backups

Paper files stored in locked storage room

Anti-virus and firewall protection

Limited access to personal data internally

Annual review of IT and data handling procedures

## 5. Data Subject Rights

West Itchenor 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

- [x] Review consent procedures (esp. mailing lists)
- [x] Annual data protection training for staff and councillors
- [x] 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

- [x] Completed Data Audit Template
- [x] Privacy Notice (Public)
- [x] Data Protection Policy
- [x] Document Retention Scheme
- [x] Consent form (if applicable)
- [x] Data Breach Procedure
- [x] Data Processor Agreements (or confirmations)
- [x] Data Protection Impact Assessment template

| **Approved by Full Council** | **Date** |
|---|---|
| **To be reviewed** | Nov-26 |