

## West Horsley Parish Council – Data Audit Report

Clerk/Responsible Officer  
Adopted:  
Next Review:

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Full Council 17 February 2026  
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### 1. Overview

This data audit sets out how West Horsley 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   |
|--------------------------------------|---|----------------------------------|-------------------------------------|-----------------------------|--------------------------------------|---|-----------------------------------|---|
| <b>Council Minutes &amp; Agendas</b> | 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  |
| <b>Planning Comments</b>             | Name, address, comment content          | Residents                        | Responding to planning applications | Public Task                 | Email/post                           | Secure cloud storage, hard copy               | 6 years                           | GBC Planning  |
| <b>Tennis Court Hire</b>             | Name, contact details                   | Hirers                           | Booking and invoicing               | Consent                     | Online signup, email                 | Hallmaster secure cloud storage, email server | Until unsubscribed                | Hallmaster (data processor)                               |
| <b>Staff Records</b>                 | Name, address, payroll data, appraisals | Employees                        | Employment                          | Legal Obligation & Contract | Directly from staff                  | Secure cloud storage                          | 6 years post-employment           | Surrey Community Action (payroll provider), HMRC, Auditor |
| <b>Email Enquiries</b>               | 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    |
| <b>Newsletter Mailing List</b>       | Name, email address                     | Residents                        | Community engagement                | Consent                     | Online signup                        | Mailchimp (or similar)                        | Until unsubscribed                | Mailchimp (data processor)                                |
| <b>CCTV</b>                          | Video footage, no sound                 | Visitors to council property     | Security and safety                 | Legitimate Interest         | CCTV system                          | DVR   | Max 30 days unless incident       | Designated cllr/staff Police (if required)                |
| <b>Finance</b>                       | 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 - Surrey Community Action | 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 - Vision ICT                  | Council website     | Public documents | Yes and in place until terminated   |            |

|  |  |  |  |   |
|--|--|--|--|---|
| Email Provider and data backup - Microsoft | Communication and computer backup  | Emails   | <a href="#">Microsoft Customer Agreement</a>   |   |
| Mailchimp                                  | E-Bulletins  | Subscriber emails  | <a href="#">Mailchimp Data Processing Addendum</a>   |   |
| Mailbird                                   | Newsletter   | Postal mailing list (addresses only)   | <a href="#">Mailbird Data Protection Policy</a>  |   |
| 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 below)   | <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 systems, and compliance, | Including access to payroll, personnel, and payment records  | Yes and in place until March 2026  |   |
| Guildford Borough Council                  | Governance, planning, assistance with queries                            | Contact details - names, addresses, emails   | dpo@guildford.gov.uk Yes and in place until terminated   |   |
| Surrey County Council                      | Assistance with resident queries   | Contact details - names, addresses, emails   | <a href="https://www.surreycc.gov.uk/council-and-democracy/your-privacy/corporate-privacy-notice">https://www.surreycc.gov.uk/council-and-democracy/your-privacy/corporate-privacy-notice</a>  |   |
| Rialtas                                    | For Accounts   | Contact details - names, addresses, emails, telephone numbers  | Yes and in place until terminated  | <a href="https://rialtas.co.uk/privacy-statement-and-data-protection/">https://rialtas.co.uk/privacy-statement-and-data-protection/</a> |
| Lloyds Bank, Skipton Building Society      | 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
- Regular backups to external hard drives
- Archived 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**

West Horsley 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**

- Review consent procedures (esp. mailing lists)
- 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**

- Completed Data Audit Template
- Privacy Notice
- Data Protection Policy
- Model Publication Scheme FOI
- CCTV Policy
- Document Retention Scheme
- Data Processor Agreements (or confirmations)