

## **BURTON & WINKTON PARISH COUNCIL**

### **DATA AUDIT & INFORMATION ASSET REVIEW**

**For Clerk and Council Members**

**(Adopted June 2026)**



#### **1. Purpose of the Data Audit**

This Data Audit identifies all categories of information held by Burton & Winkton Parish Council, the lawful basis for processing, storage locations, access controls, retention periods, and associated risks. It supports compliance with:

- UK GDPR
- Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Act 1972
- Transparency Code 2015
- Local Audit and Accountability Act 2014

The audit informs the Council's **Information Asset Register**, **Privacy Notices**, **Retention Policy**, and **Data Protection Impact Assessments (DPIAs)** where required.

#### **2. Roles and Responsibilities**

- **Data Controller:** Burton & Winkton Parish Council
- **Data Protection Lead:** Parish Clerk
- **Information Asset Owners:** Clerk (primary), Chair (governance oversight)
- **Data Processors:**
  - Payroll provider (if applicable)
  - Website administrator
  - Email/IT service providers
  - Contractors engaged for council business

Councillors access data only where necessary for decision-making and casework.

### 3. Summary of Information Assets

#### A. Governance & Administration

Asset	Description	Lawful Basis	Storage	Access	Retention
Council Minutes & Agendas	Records of meetings, decisions, attendance	Public Task	Clerk laptop, Website, OneDrive	Clerk, Councillors, Public	Permanent
Policies & Procedures	Standing Orders, Financial Regs, Risk Assessments	Public Task	Clerk laptop, Website	Clerk, Councillors	Until superseded
Correspondence	Emails, letters, enquiries	Public Task / Legitimate Interest	Clerk email, Council email accounts	Clerk, relevant Councillors	2 years unless required longer

#### B. Finance & Audit

Asset	Description	Lawful Basis	Storage	Access	Retention
Financial Accounts	Receipts, payments, bank statements	Legal Obligation	Clerk laptop, OneDrive	Clerk, Internal/External Auditor	7 years
Payroll Records	Salaries, HMRC submissions	Legal Obligation	Secure digital folder	Clerk, Payroll provider	7 years
CIL Records	Receipts, spending, monitoring reports	Legal Obligation	Clerk laptop, Website	Clerk, Councillors, Public	6 years
Grants	Applications, approvals, monitoring	Public Task	Clerk laptop	Clerk, Councillors	6 years

### C. Staffing

Asset	Description	Lawful Basis	Storage	Access	Retention
Employee Records	Contracts, appraisals, training	Contract / Legal Obligation	Secure digital folder	Clerk, Chair (limited)	6 years after employment ends
Recruitment	Applications, interview notes	Legitimate Interest	Clerk laptop	Clerk	6 months (unsuccessful)

### D. Councillor Information

Asset	Description	Lawful Basis	Storage	Access	Retention
Register of Interests	DPI forms	Legal Obligation	Website, Clerk laptop	Clerk, Councillors, Public	Duration of term + 1 year
Contact Details	Email, phone (where provided)	Public Task / Consent	Clerk laptop	Clerk, Councillors	Duration of term

### E. Community & Casework Data

	Description	Lawful Basis	Storage	Access	Retention
Parishioner Correspondence	Complaints, enquiries, planning comments	Public Task	Clerk email	Clerk, relevant Councillors	2 years
Event Management Data	Stallholder forms, insurance, risk assessments	Contract / Public Task	Clerk laptop	Clerk, Event Leads	Minimum of 3 years
Hal/Facility Bookings (if applicable)	Contact details, invoices	Contract	Clerk laptop	Clerk	6 years

## F. Website & Communications

Asset	Description	Lawful Basis	Storage	Access	Retention
Website Content	Minutes, policies, transparency data	Public Task	Website CMS	Clerk, Web Admin	Permanent
Mailing Lists	Newsletters, event updates	Consent	Secure mailing platform	Clerk	Until consent withdrawn

## 4. Data Storage & Security Controls

- **Devices:** Clerk laptop (password-protected, encrypted)
- **Cloud Storage:** OneDrive (Microsoft 365)
- **Email:** Council-issued email accounts
- **Backups:** Automated cloud backup
- **Physical Records:** Minimal; stored securely if held
- **Access Controls:**
  - Clerk: full access
  - Councillors: restricted to governance and casework
  - Public: only published data

## 5. Data Sharing

Data may be shared with:

- Internal and External Auditors
- HMRC
- Payroll provider
- Insurers
- Contractors (where necessary)
- Members of the public (FOI/EIR requests)

All sharing is governed by **lawful basis, data minimisation, and confidentiality requirements.**

## 6. Data Retention Overview

- **Financial records:** 7 years
- **Governance documents:** Permanent
- **Correspondence:** 2 years
- **Staff records:** 6 years after employment ends
- **Event documentation:** minimum of 3 years
- **Planning comments:** Duration of application + 1 year
- **Councillor records:** Duration of term + 1 year

## 7. Risks Identified

Risk	Likelihood	Impact	Mitigation
Loss of data	Low	High	Cloud backup, encryption
Unauthorised access	Low	High	Password protection, limited access
Incorrect retention	Medium	Medium	Retention schedule, Clerk oversight
Data breach via email	Medium	High	Use of council email only, training
Website publishing errors	Low	Medium	Clerk review before upload

## 8. Recommendations

- Maintain annual review of this Data Audit.
- Ensure all Councillors use **official council email accounts**.
- Continue to publish transparency data quarterly.
- Review and update Privacy Notices annually.
- Provide refresher GDPR training for Councillors each year.

## 9. Approval & Review

This Data Audit will be reviewed annually or sooner if required by legislative change or operational need.

**Reviewed by:** Parish Clerk

**Adopted by:** Burton & Winkton Parish Council 16.06.26

**Next Review:** June 2027

Adopted 16.06.26 (KH)