

Rooksdown Parish Council – Data Audit Report

Date Completed: January 2026

Reviewed By: Full Council 26/01

1. Overview

This data audit sets out how RPC processes personal data in the course of its duties and functions. It is designed to ensure compliance with the UK GDPR and

2. Data Inventory Table

Data Category	What Personal Data?	Who It Relates To	Purpose	Lawful Basis
Council Minutes & Agendas	Names, roles, public comments	Councillors, public	Governance, public record	Legal Obligation
Planning Comments	Name, address, comment content	Residents	Responding to planning applications	Statutory Consultee
Allotment holders	Name, contact details, payment info	Allotment tenants	Invoicing and record keeping	Legal Obligation & Contract
Employee Records	Name, address, payroll data, appraisals	Employees	Employment	Legal Obligation & Contract
Email Enquiries from residents	Name, contact info, content	General public	Responding to queries	Legitimate Interest
Finance/Invoices/Payments	Name, Payment details	Staff, residents and contractors	To make and receive payments	Legal obligation

3. Data Processors (External Parties)

Processor	Purpose	Data Shared	DPA in Place? (Data Processing Agreement)	Other info
Payroll Provider - DM 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	
Website Host - Aubergine	Council website	Public documents	Yes and in place until terminated	
Email Provider - microsoft	Communication	Emails	https://www.microsoft.com/licensing/terms/product/PrivacyandSecurity	
External Auditors - BDO	Financial audit	Invoices, pay, contracts	Data shared with the appointed external auditor (BDO LLP) as part of statutory audit requirements under the Local Audit and Accountability Act 2014.	https://www.bdo.co
Internal Auditor - Mulberry LAS	Internal audit of council governance, financial	Including access to payroll, personnel, and	Yes and in place until March 2028	
Cloudy IT	Computer backup and support	All electronic information	Yes and in place until terminated	
BDBC	Governance, planning, assistance with queries	Contact details - names, addresses, emails	General Data Protection Regulation	
HCC	Assistance with resident queries	Contact details - names, addresses, emails	Hampshire County Council General Privacy Notice About the Council H	
Rialtas	For Accounts and bookings	Contact details - names, addresses, emails, telephone numbers	Yes and in place until terminated	https://rialtas.co.uk/privacy-statement-and-data-protection/

Unity 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

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

Rooksdown 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.

and Data Protection Act 2018, promote transparency, and support accountability.

How It's Collected	How It's Stored	Retention Period	Shared With
Directly at meetings or submissions	Website, Secure cloud storage and hard copy	Indefinite (archival)	Public via website
Email/BDDC planning portal	Secure cloud storage	6 years	HDC Planning
Email	Secure cloud storage	6 years (financial)	No
Directly from staff	Secure cloud storage, locked file	6 years post-employment	Payroll provider, HMRC, Auditor
Email	secure cloud storage/email server	1 year	Councillors, BDBC and HCC 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

