



## Horningsham Parish Council Data Audit

### Glossary of Terms

"Personal Data" is any information about a living person which can identify them. This is not just someone's name and address but any information which can identify them (directly or indirectly). For example, a phone number or email address is personal data. Any other contact information or a person's employment history, or credit history are all personal data.

"Data controller" is the person within the organisation who determines the how and what of data processing.

"Data processor" is the person that processes the data on behalf of the controller.

"Data subject" is the person about whom personal data is processed.

"Processing" personal data means storing or deleting any personal data on a computer, database or some manual files (e.g. HR, or invoices with contractor payment details).

The word 'processing' also covers selecting a name for a mailing list or reading it off a screen during a call. It includes transferring and altering data. Indeed, practically anything done to personal data constitutes processing.

"Sensitive personal data or special categories of personal data" are any of the following types of personal data about a data subject: racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical or mental health or condition; sexual life or orientation; genetic data; and biometric data.

### **LAWFUL BASIS FOR PROCESSING AND STORING DATA:**

The lawful basis for processing and storing data are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

Legal obligation: the processing is necessary for you to comply with the law.

Vital interests: processing is necessary to protect someone's life.

Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

Legitimate interests: processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

## **COMMUNICATING PERSONAL DATA**

a) What type of personal data does the Parish Council keep?

Councillors - name, address, telephone number, email address and photograph.

Employees - name, address, telephone number, email address, payroll and personal information and bank details.

Suppliers - name, email address, telephone number and bank account details.

Residents of the Parish - name and address (copy of electoral register securely stored).

Email contacts & General correspondence received – name, email address, telephone number and postal address

b) Where does the Parish Council get the personal data from?

Councillors - provided by the Parish Councillors themselves.

Employees - provided by the employee themselves and HMRC for PAYE and NI information.

Suppliers - provided by the supplier themselves.

Residents of the Parish - provided by Wiltshire Council – copy of Electoral Register (held securely)

Email contacts & General correspondence received - provided by the e-mail/correspondence sender.

c) Why does the Parish Council collect or process the data – what does the council do with the personal data?

Councillors – contact details, update of web site. Lawful basis for data collection/process - Contract

Employees – contact details, employment law, HMRC requirements and payroll processing. Lawful basis for data collection/process – Contract/Legal Obligation

Suppliers – contact details and payment of invoices by bank transfer. Lawful basis for data collection/process - Contract

Residents of the Parish – contact details and reference. Lawful basis for data collection/process – Data Sharing Agreement – responsibility of ADC to set up as they supply the data.

Email contacts & General correspondence received – replies to emails, contact councillors, employees, suppliers and other relevant contacts. Lawful basis for data collection/process – Legitimate interests

d) Who does the council disclose personal data to?

Councillors - Posted on the Parish Council web site, detailed in the minutes of the Parish Council meetings and held by The Wiltshire and Swindon History Centre

Employees – Posted on the Parish Council web site, detailed in the minutes of the Parish Council meetings , tax and NI information disclosed to HMRC

Suppliers – Parish Councillors and employees.

Residents of the Parish – Employee (only used by the Parish Clerk for reference purposes)

Email contacts & General correspondence received – employees and Councillors

e) Do the Parish Council meeting minutes contain personal data?

Names of Parish Councillors, Parish Clerk, and potentially any other attendees of the meeting.

f) Does the Parish Council ever send personal data overseas and if so where to and to which organisation? This might include overseas companies providing database or email services.

No

g) Does the council collect any sensitive personal data?

No

h) If so for what reason?

Not applicable

## **SUPPLIERS, COMPANIES, AND OTHER ORGANISATIONS THE COUNCIL CONTRACTS WITH**

About individuals or representatives of organisations which supply us with services such as for council repairs, or with whom we are in contact

- i. Who does the council keep personal data about?

Suppliers and Contractors

- ii. b) What type of personal data does the council keep?

Name, telephone number, email address and bank details for payment of invoices by bank transfer.

- iii. c) Where does the council get the data from?

Provided by the supplier themselves.

- i. d) Why does the council collect or process the data?

Contact details and for payment of invoices by bank transfer.

## **GENERAL QUESTIONS ABOUT PERSONAL DATA**

How does the Parish Council store the personal data collected?

- a) One Parish Council owned laptop, secure cloud storage provided by Cloudy IT and Councillors and Employees own personal computers, tablets and mobile phones.

- b) Does the council take any steps to prevent unauthorised use of or access to personal data or against accidental loss, destruction or damage? If so, what?

The laptop is only used by the Parish Clerk and is password protected; therefore unauthorised use or access risk is very low. Cloud storage is secure and can only be accessed with a password.

- c) How does the council manage access to data?

Restricted number of authorised users, password controls.

- d) What is the process involved in giving access to staff or councillors?

The laptop is only accessed/used by one person - Parish Clerk. Councillors have access to the secure cloud storage via passwords

**Do any procedures exist for e.g. correcting, deleting, restricting, personal data? If so, please provide details.**

Data is only corrected, deleted by the Parish Clerk. Any changes are usually only made due to changes supplied by the data subject.

Who has access to / is provided with the personal data (internally and externally)?

Parish Clerk and parish Councillors.

b) Is there an authorisation procedure for accessing personal data? If so, please provide details.

No due to the very restricted access to data.

9. Does the council provide a copy of all existing privacy notices?

Yes – Privacy notices have been adopted.

10. As far as the council is aware, has any personal data which was gathered for one purpose been used for another purpose (e.g. communicating council news?) If so, please provide details.

No

11. Does the council have any policies, processes or procedures to check the accuracy of personal data?

No - the data held is very limited and is mainly retained for contractual and legal obligations.

12. a) In the event of a data security breach occurring, does the council have in place processes or procedures to be followed?

Yes - Data Security Breach policy has been adopted.

b) What are these?

See Data Security Breach policy.

13. a) If someone asks for a copy of personal data that the council holds about them, i.e. they make a 'subject access request,' is there a procedure for handling such a request?

Yes – Subject Access Request Procedure has been adopted.

b) Is this procedure contained in a written document?

Yes – See Subject Access Request Procedure

14. Does the council have an internal record of the consents which the council has relied upon for processing activities?

Consent form

15. a) Are cookies used on our Parish Council website?

Yes. The cookie banner will only be displayed when the website is using features that use cookies e.g. Google Maps. Consents are requested for Google Maps, YouTube video, Store, Website Translator and IONOS analytics.

b) Does the council provide information about the cookies used and why they are used?

Pop up message when users visit the site for the first time: *This site uses third-party website tracking technologies to provide and continually improve our services, and to display advertisements according to users' interests. I agree and may revoke or change my consent at any time with effect for the future.*

c) Does the council keep a record of the consents provided by users to the cookies?

No, the site does not request consent for the use of these cookies. In general, sites do not record specific users' consent. They either make people aware that the site uses cookies (and so by using the site they consent), or they ask before setting any cookies. To the user, these two approaches look fairly similar. Users can use the site without cookies if they can make the appropriate settings in their browser.

d) Does the council allow individuals to refuse to give consent?

No, apart from it is possible for users who do not want to accept our cookies from making settings in their browser to this effect

16. Does the council have website privacy notices and privacy policies?

Yes <https://www.horningshamparishcouncil.gov.uk/privacy-policy/>

17. a) What data protection training do staff and councillors receive?

Internal ongoing training only.

b) What does the training involve?

In house training carried out by the Clerk and Parish Councillors.

Does anyone in the council have responsibility for reviewing personal data for relevance, accuracy and keeping it up to date?

Yes - Parish Clerk

b) If so, how regularly are these activities carried out?

Ongoing process

19. a) What does the council do about archiving, retention or deletion of personal data?

See [Documents Retention and Disposal Policy](#) adopted 25<sup>th</sup> September 2025.

b) How long is personal data kept before being destroyed or archived?

See [Documents Retention and Disposal Policy](#)

c) Who authorises destruction and archiving?

Parish Clerk in line with the Documents Retention and Disposal Policy

## **MONITORING**

Please identify any monitoring of the following systems that takes place. 'Monitoring' includes all monitoring of systems including intercepting, blocking, recording or otherwise accessing systems whether on a full-time or occasional basis. The systems are:

(i) computer networks and connections

The Parish Council only has one computer connection – Clerks home

The Clerks connection is not public as it is within the Clerks residence.

(ii) CCTV and access control systems

Not applicable

(iii) communications systems (e.g. intercom, public address systems, radios, walkie-talkies)

Not applicable

(iv) remote access systems (security systems)

Not applicable

(v) email

All employees and Councillors have .gov.uk email addresses that can be monitored and cancelled/removed by the domain hosting company.

(vi) telephones, voicemail, mobile phone records

Not applicable

b) Does the council have notices, policies or procedures relevant to this monitoring?

Not applicable

## Horningsham Parish Council Data Map

<b>Purpose of Processing</b>	<b>Categories of personal data</b>	<b>Categories of recipients (sharing)</b>	<b>Categories of processors</b>	<b>Retention schedule</b>	<b>Article 6 lawful basis for processing personal data</b>	<b>Article 9 condition for processing special category data</b>
Minutes	Identity, contact information	N/A	Cloud storage provider: Cloudy IT  Website provider IONOS	Indefinite	Legal obligation	N/A
Accounts	Identity, contact information, bank details	HMRC	Cloud storage provider: Cloudy IT	Indefinite	Legal obligation	N/A
Correspondence and Casework	Identity, contact information, special category data	N/A	Cloud storage provider: Cloudy IT	Records kept for as long as they are needed for reference or accountability purposes, to comply with regulatory requirements or to protect legal and other rights and interests.	Public task	Substantial public interest conditions

Payroll	Identity, contact information, bank details	HMRC	Cloud storage provider: Cloudy IT	12 years	Legal obligation	N/A
HR Files	Identity, contact information	N/A	Cloud storage provider: Cloudy IT	7 years post-employment	Contract	Employment, social security and social protection

Date of policy	9 <sup>th</sup> January 2026
Date approved	16 <sup>th</sup> April 2026 Minute 13/2026
To be reviewed	April 2027