Hambledon Parish Council – Data Audit Report

Date Completed: March 2026
Clerk: Catherine Russell
Reviewed By: Full Council April 2026

1. Overview

This data audit sets out how Hambledon 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	WBC 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
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

3. Data Processors (External Parties)

Processor	Purpose	Data Shared	DPA in Place? (Data Processing Agreement)	Other info
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	Council website	Public documents	Privacy Policy - Hambledon Village Web Site	
Email Provider (LCN)	Communication	Emails	Privacy Policy - Hambledon Village Web Site	
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	https://www.pkf-l.com/data-protection-privacy-notice/

Internal Auditor	Internal audit of council governance, financial	Including access to payroll, personnel,	tbc
Waverley Borough Council	Governance, planning,	Contact details -	Main Council Privacy Notice | Waverley Borough
Surrey County Council	Assistance with resident	Contact details -	https://www.surreycc.gov.uk/council-and-
Lloyds 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.

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

Hambledon 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. Supporting Documents Prepared

Data Protection Policy
Document Retention and Disposal Schedule

Approved by Full Council	Date
To be reviewed	September 2027