

Chiddingstone Parish Council – Data Audit Report

Date Completed: 28th September 2026
Clerk/Responsible Officer: Louise Kleinschmidt
Reviewed By: Full Council **14th October 2026**

1. Overview

This data audit sets out how Chiddingstone 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	SDC 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	HMRC, Auditor
Email Enquiries	Name, contact info, content	General public	Responding to queries	Legitimate Interest	Email	secure cloud storage/email server	Chair & Clerk 5 years, Councillors 1 year	Councillors 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 monitoring. Auditors

3. Data Processors (External Parties)

Processor	Purpose	Data Shared	DPA in Place? (Data Processing Agreement)	Other info
HMRC - In House	Statutory reporting	Employee pay/tax	Clerk/RFO 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	Vision ICT Privacy Notice	
Email Provider - Vision ICT	Communication	Emails	Vision ICT Privacy Notice	

External Auditors - Mazars LLP	Financial audit	Invoices, pay, contracts	Data shared with the appointed external auditor (Mazars) as part of statutory audit requirements under the Local Audit and Accountability Act 2014. Mazars acts as an independent data controller and publishes their own privacy notice.	
Internal Auditor - Mulberry LAS	Internal audit of council governance, financial	Including access to payroll, personnel,	Mulberry LAS Privacy Notice	
Sevenoaks District Council	Governance, planning, assistance with queries	Contact details - names, addresses, emails	SDC Data Privacy Notice	
Kent County Council	Assistance with resident queries	Contact details - names, addresses, emails	KCC Data Privacy Notices	
Unity Trust Bank Current and Instant Access Accounts	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	Signature of legal documents	Contact details - names, addresses, emails	Docusign Data Privacy Notice	

4. Security Measures

Password-protected cloud storage and email accounts
 Daily backups
 Anti-virus and firewall protection
 Limited access to personal data internally
 Annual review of IT and data handling procedures

5. Data Subject Rights

Chiddingstone 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
- Regular data protection training for staff and councillors
- All third-party processors to have up-to-date agreements
- Maintain an incident log for data breaches

Approved by Full Council	Date
To be reviewed	Oct-26