



DATA AUDIT 2026/27

Prepared by: The Clerk

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This Scheme was subsequently reviewed, and approved without amendment by the Parish Council on:

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1 Introduction and Scope

1.1 The purpose of a data audit is to identify the data that the Parish Council processes, identify the purpose and lawful basis for the processing, and record of who has access to the data.

1.2 It is an important stage in assessing whether there are any risks associated with the Parish Council's data processing activities and ensuring compliance with the Data Protection Act 2018, Data Use and Access Act 2025 and UK GDPR.

2 Lawfulness of Processing

2.1 The lawful bases for processing are set out in Article 6 paragraph 1 of the UK GDPR legislation. At least one of these must apply whenever you process personal data:

- a) **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- b) **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.
- c) **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- d) **Vital interests:** the processing is necessary to protect someone's life.
- e) **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.
- f) **Legitimate interests:** the 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. (This cannot apply if you are a public authority processing data to perform your official tasks.)

2.2 The table below confirms the legative basis of the Parish Council processing personal data that it holds.

ADMINISTRATION & GOVERNANCE							
Subject	Purpose of Processing	Categories of Personal Data	How Information is Held	Joint Controllers	Categories of Individuals	Lawful Basis for Processing	Shared With/Accesses
Employees	To administer employment, recruitment, payroll, pensions, performance management, statutory reporting, training, leave & sickness management, time recording, HR and compliance with employment law and health and safety legislation / monitoring. Administration of employee salaries, statutory deductions, and pension contributions. Data is provided directly by employees and job applicants, and Occupational Health providers (where applicable), and HMRC, pension providers and other statutory bodies.	Name, postal address, email address, telephone number, dates of birth, national insurance number, employment history, education, skills, knowledge and qualifications in accordance with job application. Salary and bank details. Employment contracts, performance (appraisal) records, discipline/ grievance record, next of Kin details, attendance and leave records. Sickness and medical information (where required for statutory or employment purposes). Equal opportunities monitoring data (where collected). Health information necessary for statutory sick pay, health and safety, risk assessments, and occupational health referrals. Images published	Electronic & Hard Format	The Parish Town Council is the Data Controller, other than when a consultant is used to recruit new members of staff who acts as Data Processors under contract.	Current employees. Former employees - where records retention is required). Job applications (unsuccessful applicants for a period of 6 months after end of recruitment process.)	Article 6(1)(b) Article 6(1)(c) Article 6(1)(e) Article 6(1)(a) – publication of images	Councillors HMRC Pensions Provider External professional HR Advisors Health & Safety Executive (e.g. Riddor incident)

		on the council's website or for publicity purposes.					
Councillors	To support elected members in performing their democratic duties — such as receiving meeting documents, meeting statutory responsibilities, engaging with residents, serving on work parties, and adhering to transparency and governance standards. Additionally, this processing aids in publishing information required by the Localism Act 2011 and the Transparency Code.	Name, home address, email address (council & personal), telephone number(s), declaration of interests, register of interests, attendance records, voting at meetings, images published on the council's website or for publicity purposes.	Electronic and hard format.	The Parish Council is the Data Controller.	Elected and co opted members of the Parish Council.	Article 6(1)(c) Article 6(1)(e) Article 6(1)(a)	Public (Except where non-disclosure is agreed)
Volunteers	To Coordinate and manage volunteers for Parish Council projects, activities and initiatives; share relevant information; ensure health, safety, and safeguarding compliance; and keep records of participation. Volunteers provide data directly, or parents/guardians do so for those under 18 when needed.	Names and email address, Telephone numbers, Emergency contact details (where collected). Information for risk assessments and safeguarding (if applicable). Parent/guardian contact details for volunteers under 18 .	Electronic and hard format.	The Parish Council is the Data Controller.	Parish residents and other Volunteers including under 18's participating in supervised activities with the Council.	Article 6(1)(e) Article 6(1)(a) – Consent for publication of Images	Parish Clerk

Audit and Governance	To receive and inspect the Councils arrangements for audit and governance forming part of the Annual Governance & Accountability Return (AGAR) which includes an Annual Governance Statement and Accounting Statements.	Names and signatures of the Clerk, RFO and Chair of Council	Electronic and hard format.	The Parish Council is the Data Controller.	Members of the Public	Article 6(1)(c)	Public Councillors Parish Clerk
Correspondence	To facilitate Parish Council communications and business, including responding to enquiries, sharing information, requesting actions, and fulfilling statutory or public duties.	Names, postal addresses, email addresses, telephone numbers and social media.	Electronic	N/A	Members of the public Contractors and service providers Organisational representatives	Article 6(1)(e) Article 6(1)(c) Article 6(1)(a)	Parish Clerk
Complaints Handling/Code of Conduct Complaints	To administer complaints from residents, carry out investigations, liaise with Monitoring Officer (for councillor conduct complaints), and maintain records.	Names and contact details, details relating to the nature of the complaint, evidence, report outcomes and response/s.	Electronic	The Monitoring Officer would be an independent data controller for Code of Conduct Complaints.	Complainants Individuals complained about Witnesses	Article 6(1)(e) Article 6(1)(c)	Parish Clerk Monitoring Officer
Freedom of Information Requests and Subject Access Requests	To process legislative information requests, respond within legal deadlines, and maintain records for audit and legal compliance.	Name, contact details, identity documents (for SARs only) and the request.	Electronic	The Parish Council is the Data Controller.	Members of the public and Legal representatives submitting requests	Article 6(1)(c)	Parish Clerk

Statutory Consultations, Neighbourhood Planning and Other Legislative Consultations	To receive representations as part of formal consultations, publish responses as mandated by law, summarise key issues, and submit relevant materials.	Names, postal address, email address and subject matter representations submitted.	Electronic	Planning Authority statutory planning functions. Neighbourhood planning consultants serve as Data Processors under contract, handling consultation responses and preparing reports for the Parish Council.	Residents Businesses Statutory consultees. Other stakeholders participating in consultations.	Article 6(1)(c) Article 6(1)(e)	Parish Clerk Councillors Neighbourhood planning consultants
Planning Applications	The Parish Council is a statutory consultee for planning applications.	Names and contact details of planning applicants, agents, planning authority officer details, responses, decisions and reports.	Electronic	The Parish Council is a Data Controller as part of its consultee function.	Officers and Councillor's, Planning applicants and agents. Members of the public submitting comments or speaking at Council meetings.	Article 6(1)(c)	Parish Clerk Public (Planning Authority portal and Parish Council web site for responses). Councillors
Minutes	To maintain an accurate record of Parish Council decisions, discussions, and resolutions — including consultants or similar attending	Names of consultants who participate (where recorded).	Electronic and hard format.	The Parish Council is the Data Controller.	Members of the public, Councillors and Officers in attendance at the meeting.	Article 6(1)(e)	Public Councillors and Parish Clerk

	meetings. Minutes must comply with the Transparency Code for Smaller Authorities and the Local Government Act 1972.						
Contractors, Suppliers and Service Providers	The procurement of goods and services, management of contracts, invoicing and payments, evidence of Procurement Act and Financial regulations compliance, and maintain audit records.	Name of company / representative, business contact details including email address and telephone number Bank account information (for payments). Contract particulars.	Electronic	N/A	Contractors, consultants, Sole traders and other goods and service providers.	Article 6(1)(b) Article 6(1)(c)	Parish Clerk Councillors
Insurance Claims	To manage reported incidents, notify insurers, review claims, liaise with claimants, and retain records for statutory periods.	Names and contact details, incident details, injury details, witness information, Photographs/ videography and correspondence between parties and insurers.	Electronic	Parish Council insurance Provider acts as an independent controller.	Claimant including legal representative witness/es, and insurers.	Article 6(1)(c) Article 6(1)(e)	Parish Clerk
Information Sharing with Principal Council / Other Local Authorities	The Parish Council collaborates with principal authorities to fulfil statutory and public duties. This involves addressing resident enquiries, reporting issues, managing Highways matters, participating in planning, handling safeguarding referrals, sharing information on	Personal details of residents, address, details of enquiry, complaint or other including associated correspondence, images/video if shared in relation to matter.	Electronic	Each Council acts as an independent Data Controller for the information it receives and processes.	Members of the public, volunteers or contractors where relevant.	Article 6(1)(e) Article 6(1)(c) notices). Article 6(1)(a)	Parish Clerk Councillors

	public realm, environmental health, elections, community safety, and responding to statutory consultations.						
IT contractor: Technical support, licensing, security, data Storage, and Email Hosting.	To provide secure and effective IT Services for the Parish Council.	Officer and Councillor names, job titles and contact details, email content and metadata, stored data (technical support only), backup files.	Electronic	The Parish Council is the Data Controller. IT service provider, Microsoft and website support contractors act as Data Processors under contract.	Councillors, employees. Correspondence or documents from members of the public, Contractors and organisations.	Article 6(1)(c) Article 6(1)(e) Article 6(1)(b)	Parish Clerk IT Contractor
Website Analytics, Cookies and Server Logs	To maintain the secure and effective operation of the Parish Council's website, monitor performance, analyse usage to improve accessibility and user experience and ensure system security.	IP addresses, device and browser information, web page/site analytics.	Electronic	The Parish Council is the Data Controller for information collected via its website. The website hosting provider acts as a Data Processor for server logs and security functions.	Visitors to the website , members of the public submitting contact forms and users accessing online documents or information.	Article 6(1)(e) Article 6(1)(c) Article 6(1)(a)	Parish Clerk Web site Contractor / hosting provider
Socia Media	To share Parish Council updates, promote activities, engage with	Username/profile names, comments and messages,	Electronic	The Parish Council and the social	Members of the public engaging with Council	Article 6(1)(e) Article	Parish Clerk

	residents, answer enquiries, publish consultations, and moderate comments including replying to messages, handling comments, and reporting inappropriate content.	images or video included in posts, tags or comments		media platforms are Joint Controllers for data visible on the Council's page / platform	social media messaging or commenting, and councillors / officers appearing in posts.	6(1)(a) Article 6(1)(f)	
Community Consultations and Surveys	To collect and analyse feedback and insight from parish residents and stakeholders to guide Parish Council decisions, planning, strategy, policy, services, projects, and consultations. This includes issuing surveys, gathering responses, analysing data, reporting results, and retaining records for governance, audit, and funding.	Names (where provided voluntarily), postal address or postcode (for geographic verification), email address or telephone number (only if supplied for follow-up contact), written comments, opinions or qualitative feedback, demographic or contextual information (only if voluntarily given).	Electronic & hard format	The Parish Council is the sole Data Controller for consultation and survey data it collects. SurveyMonkey operates as a Data Processor under contract.	Parish residents / members of the public, businesses and organisations and stakeholders.	Article 6(1)(e) Article 6(1)(a)	Parish Clerk Councillors Public – Results / reports
Newsletters	To provide updates about the work of Sidlesham Parish Council, including the latest news, important announcements.	Name, email address, company (optional) and preferred format.	Electronic	N/A	N/A	Article 6(1)(a)	Parish Clerk
Media	To issue media information, statements, public notices (Notice of	Names of journalists, editors or media contacts, email addresses, telephone numbers,			Media representatives.	Article 6(1)(a)	

	election) and other authorised communications on behalf of the Parish Council to local, regional and national media outlets.	organisation details and subsequent correspondence received.					
FINANCIAL							
Subject	Purpose of Processing	Categories of Personal Data	How Information is Held	Joint Controllers	Categories of Individuals	Lawful Basis for Processing	Shared with/Accesses
Procurement, Tenders and Request for Quotations	To obtain quotations, evaluate tenders, appoint suppliers, manage public procurement obligations, and retain records for audit and transparency.	Names of bidders, business contact details, email addresses and phone numbers, quotations, pricing and tender submission documentation, insurance, health and safety documentation etc.	Electronic	N/A The Parish Council is the Data Controller.	Contractors, suppliers and service providers	Article 6(1)(b) Article 6(1)(c)	Parish Clerk Councillors Public – contracts register – web site Successful tendering contractor is published on Find a Tender
Financial Administration and Banking Records	To administer the Parish Council's financial operations, including payments, invoices, receipts, purchase orders, budget monitoring, audit trails, bank reconciliation, financial reporting, and compliance with	Names of payees, suppliers, and recipients, Bank account details, payment references and transaction data, invoices, receipts and remittance advice, email addresses and contact details, authorisations Audit trail information (signatures,	Electric & Hard Format	N/A. The Parish Council is the Data Controller. Banks act as independent Data Controllers for own	Officers and councillors with financial authorisation Contractors and suppliers Grant recipients Residents receiving	Article 6(1)(c) Article 6(1)(e)	Parish Clerk/RFO Councillors Public – AGAR / Payment approvals etc.

	statutory financial regulations.	approvals, user access logs).		processing. The Parish Council uses financial software (Scribe) for accounting and financial administration therefore Scribe is a Data Processor under contract.	refunds or payments		
Donations	To administer the Parish Council's Donations including assessing applications, determining eligibility, contacting applicants for further information, processing payments, and publishing required transparency information.	Name of applicant (individual or lead organisational contact), Postal address, Email address, Telephone number, Position and authorisation within organisation, Bank account details for Payment, Information about the organisation.	Electronic	N/A The Parish Council is the sole Data Controller.	Authorised contact for organisation	Article 6(1)(b) Article 6(1)(c) Article 6(1)(e) Article 6(1)(a)	Parish Clerk/RFO Councillors

COUNCIL SERVICES

Subject	Purpose of Processing	Categories of Personal Data	How Information is Held	Joint Controllers	Categories of Individuals	Lawful Basis for Processing	Shared with/Access
SMRG	To manage and maintain Sidlesham Memorial Recreational Ground, Management Agreement with trustees for Sidlesham Community	Name, address, email address, telephone number/s, contractor details, and payment details/ records	Electronic & Hard Copy	The Parish Council is the Data Controller.	Football Clubs, users of the Hall, contractors and trustees.	Article 6(1)(b) Article 6(1)(c) Article 6(1)(e)	Parish Clerk Councillors

	Association, invoicing, payments, inspections, health & safety, Football Clubs and correspondence.						
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