Whixall Parish Council

GDPR INFORMATION AUDIT

This Document is designed to:

1. Identify the data held and/or received by Whixall Parish Council.
2. Identify potential risks regarding Data breaches.
3. Provide the basis for self-assessment of compliance with GDPR legislation.
4. Identify actions required to be compliant or mitigate risk.

Lawful Basis for Holding Data

Consent	The data subject has given clear consent or their personal data to be processed for a specific purpose.
Contract	Data processing is necessary for a contract held with the individual or because they have asked you to take specific steps before entering into a contract.
Legal Obligation	Data processing is necessary for you to comply with the law.
Vital Interest	Data processing is necessary to protect someone's life.
Public Interest / 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 Interest	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.)

SUBJECT	Nature / purpose of processing	Type of Data / where is it from	Format held and how long data held	Who is the Data Subject	Lawful Basis for holding data	Risks and security controls in place
Staff						
Staff personal details	Payroll / HR Functions	Employment contracts Leave/ sickness records Grievance/ discipline Records Accident/ injury record Pension PAYE Bank Details Job applications (successful Unsuccessful	Hard Copy. Electronic files	Staf,f anyone who has previously applied for employment	Contract / Public Task/ Legal Obligation	**Risk** Emails being forwarded to wrong email address **Security Controls** No hard copies. Password protection. Computer records encrypted protected Information retained as per document retention policy Staff Trained in Data Protection Data only shared with HMRC, pension provider submitted using password protected software. Staff consent form distributed May 2018.
Ex staff	In case of claim	Contact details	Hard copy electronic files as per retention policy		Contract / Legal Obilgation	**Risk** - Staff passing on details to councillors outside bodies for non-staffing related matters. **Security Controls** No hard copies held. Laptop password protected. Information retained as per document retention policy Staff Trained in Data Protection
Councillors						
Personal Contact Details	Democracy/ HR	Emails, addresses bank details supplied by councillors	Hard Copy. Electronic files	Councillor	Public Task	Contact info a statutory requirement to publicise. **Risk** - Staff passing on details to people and organisations outside of the council **Security Controls**

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						No hard copies held. Laptop password protected. Information retained as per document retention policy Staff Trained in Data Protection Consent form and privacy policy provided to all councillors May 2018
Declarations of interest	Democracy	Signed form	Hard copy	Councillor	Public Task	No hard copies held. Laptop password protected.
Registers of interest	Democracy	Signed form	Hard copy	Councillor and partner	Legislative requirement	No hard copies held. Laptop password protected.
Contractors / Suppliers						
Contractors / Suppliers	Dealing with contractors requesting quotes	Contact details Invoices Orders Quotes Bank Details Insurance References	Electronic / Paper Removed as per retention policy r	Contractors / suppliers	Public task	**Risk** Passing on contact details to those outside the organisation or using it for another purpose **Security** Addresses not be passed on containing personal data without first seeking the consent.
Residents						
Electoral Roll	In order to identify electors for voting in annual parish meetings	Names of electors and their addresses, marital status From principal authority	Electronic	Parish residents	Legal obligation	**Risk** - Staff passing on details to public, councillors, outside bodies The list should not be photocopied or reproduced in any form. However, anyone can view the list (and indeed write the whole thing down if they so choose) **Security** No hard copies held. Laptop password protected.
Previous Subject Access Request information	Democracy	Name and contact information of requestor	Hard copy / electronic Removed as per retention policy	Complainant	Legal Obligation/ Public task	**Risk** - Staff passing on details to public, councillors, outside bodies choose) **Security** No hard copies held. Laptop password protected. Council email provides details of privacy notice

SUBJECT	Nature / purpose of processing	Type of Data / where is it from	Format held and how long data held	Who is the Data Subject	Lawful Basis for holding data	Risks and security controls in place
Complaints	Democracy	Name and contact information of complainant	Hard copy / electronic Removed as per retention policy	Complainant	Legal Obligation/ Public task	**Risk** - Staff passing on details to public, councillors, outside bodies **Security** No hard copies held. Laptop password protected. Council email provides details of privacy notice
Emails	Dealing with business related matters/ Public enquiries/		electronic			**Risk** Passing on contact details provided for the sole purpose of addressing a particular issue to those outside the organisation or using it for another purpose. ***Security*** Staff trained in data handling in that Emails should not be passed on containing personal data without first seeking the consent of the sender. No hard copies held. Laptop password protected. Council email provides details of privacy notice
Previous FOI requests	Democracy	Name and contact information of requestor	Hard copy / electronic Removed as per retention policy	FOI requestor	Legal Obligation/ Public task	**Risk** - Staff passing on details to public, councillors, outside bodies **Security** No hard copies held. Laptop password protected.
Community Groups						
Grant applicants	Grant applications	Application forms	Paper copies, destroyed as per data retention policy	Applicants for grants	Public task	**Risk** - Staff and councillors passing on details to public, outside bodies **Security** No hard copies held. Laptop password protected.
Planning Applications						
	Consultations on planning applications	Name and contact information of applicants	On website (direct feed from Shropshire	Applicant	Legal Obligation as consultee on planning applications Public task	No hard copies retained. All information is stored on Shropshire Council Planning Portal.

SUBJECT	Nature / purpose of processing	Type of Data / where is it from	Format held and how long data held	Who is the Data Subject	Lawful Basis for holding data	Risks and security controls in place
		received from planning register	Council's planning portal)			
Property						
	Leases/ Licences Service Level Agreements	Name and contact information of licensee/ leaseholder	Hard Copy held indefinitely or as per data retention	Leaseholder / licensee	contract	**Risk** Passing on contact details to those outside the organisation or using it for another purpose **Security** Addresses not be passed on containing personal data without first seeking the consent. Hard copies held in locked cabinet
Local Connection						
Applicants	Verification as per local connection policy	Supplied by Housing Association – details required for verification	Until applicant verified. Destroyed as per data retention policy	Applicant for a property which requires a local connection	Public task	**Risk** Passing on contact details to those outside the organisation or using it for another purpose **Security** No hard copies kept. Computer is password protected.

Additional Notes:

1. Electronic data is regularly backed up a memory stick to mitigate the risk of a catastrophic failure and the loss of operationally information.
2. The Council does not knowingly collect any overly sensitive data such as children's or vulnerable adults' records, undertake covert surveillance or data that if a breach was to occur is likely to result in serious injury; nor does it seek to use personal data it receives for commercial gain (e.g. to sell another service).

Review Frequency	Annual
Reviewed	May 2025
Next Review	May 2026