

Stretton Parish Council Data Audit

(For Assertion 10 – AGAR Annual Governance Statement)

Financial Year Covered: 2026/27

Date of Audit: 12th February 2026

Conducted By: Amanda Smith - Clerk

Approved By Council (Minute Ref): 2526-166 March 2026

1 Personal Data Inventory Register

Ref	Data Category	Description of Data	Data Subjects	Purpose of Processing	Lawful Basis (UK GDPR)	Storage Location	Format	Accessed By	Shared With	Retention Period	Security Measures
1	Staff Payroll	Names, NI numbers, salary	Employees	Payroll processing	Legal obligation	Payroll cloud server, clerk filing cabinet	Digital and paper	Clerk, Payroll Provider	HMRC	6 years	Password protected, encrypted backup
2	Councillor Contact Details	Names, emails, phone numbers	Councillors	Governance communications	Public task	Council email system	Digital	Clerk	Website (emails)	While in office	Domain-controlled email
3	Public	Names, emails, addresses, telephone numbers	General public	Contact on issues	Consent	Laptop and meeting attendance book	Digital and Paper	Clerk	Noone	While issue remains Until book full	Clerk passworded laptop Clerk filing cabinet

2 Data Flow & Storage Mapping

For each system used:

System/Platform	Provider	What Data Is Held	Where Is It Hosted	Is There a Contract?	Backup Method	Risk Level (Low/Med/High)
Council Email	Microsoft 365	Councillor & resident emails	UK/EU Cloud	Yes	Cloud backup	Low
Website	Parish Website Provider	Public documents, contact forms	UK	Yes	Provider managed	Medium

3 Lawful Basis Register (UK GDPR)

Confirm lawful basis for each processing activity:

- Public Task
 - Legal Obligation
 - Contract
 - Consent
 - Legitimate Interest
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4 Third-Party Data Sharing Register

Third Party	Purpose of Sharing	Data Shared	Contract in Place?	Data Processing Agreement?	Risk Rating
Payroll Provider	Process salaries	Staff payroll data	Yes	Yes	Low

5 Retention & Disposal Review

Data Type	Retention Period	Disposal Method	Last Reviewed
Financial Records	6 years	Secure deletion	March 2026
Staff Files	6 years post-employment	Shredded/deleted	March 2026
General Public Information	Until issue resolved	Secure deletion / shredded	March 2026

6 Security & Governance Checklist

Email & Domain Control

- Council uses a council-owned domain (.gov.uk or .org.uk)
- No councillors use personal email for council business

Devices & Access

- Devices password protected
- Anti-virus software active
- Access restricted to authorised users
- Backup process documented

Policies in Place

- Data Protection Policy
- IT & Acceptable Use Policy
- Data Retention Policy
- Privacy Notice published
- Data Breach Procedure

7 Training & Awareness

Person/Role	Training Completed	Date	Evidence Held
Clerk	Data Protection Training	Feb 2026	Certificate
Councillors	GDPR Briefing	Mar 2026	Minutes

8 Risk Assessment Summary

Identify key risks and mitigation:

Risk	Impact	Likelihood	Mitigation	Review Date
Use of personal email	Data breach	Medium	Enforce council domain use	Quarterly

10 Annual Review Declaration

This Data Audit has been reviewed and the Council confirms it understands what personal data it holds, why it holds it, and how it is protected in accordance with UK GDPR and the Data Protection Act 2018.

Signed:

Clerk/RFO: A Smith

Chair: E Pritchard

Date Approved: 3rd March 2026