

Rusper Parish Council – Data Audit Report

Date Completed: 27th November 2025
Clerk/Responsible Officer: Lisa Wilcock
Reviewed By: Full Council May 2026

1. Overview

This data audit sets out how Rusper 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	GBC 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, WSALC if necessary to resolve query
Mailing Lists or Surveys via website	Name, email address	Residents	Community engagement	Consent	Online signup	MailerLite (or similar)	Until unsubscribed	MailerLite (data processor)
CCTV (if applicable)	Video footage	Visitors to council property	Security	Legitimate Interest	CCTV system	DVR	Max 30 days unless incident	Police (if required)
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
Payroll Provider - Mulberry and Co	Monthly payroll	Employee details	Yes and in place until terminated	
HMRC - Mulberry and Co	Statutory reporting	Employee pay/tax	No DPA required. Mulberry and Co 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 - Hugofox	Council website	Public documents	Yes and in place until terminated	
Email Provider (e.g. Outlook/Microsoft)	Communication	Emails	Microsoft Products Addendum	
External Auditors - Moores LLP	Financial audit	Invoices, pay, contracts	Data shared with the appointed external auditor (Moores) as part of statutory audit requirements under the Local Audit and Accountability Act 2014. Moores acts as an independent data controller. Moores publishes their own privacy notice.	Moore Privacy Notice
Internal Auditor - Mulberry LAS	Internal audit of council governance, financial	Including access to payroll, personnel, and	Yes and in place until March 2026	
Horsham District Council	Governance, planning, assistance with queries	Contact details - names, addresses, emails	HDC Data Privacy Notice	
West Sussex County Council	Assistance with resident queries	Contact details - names, addresses, emails	WSCC Data Privacy Notices	
Scribe Accounts	For Accounts and bookings	Contact details - names, addresses, emails, telephone numbers	Yes and in place until terminated	Scribe Accounts Privacy Notice

Unity Bank and Nationwide	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				

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

Rusper 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 (esp. mailing lists)
- ☒ Annual data protection training for staff and councillors
- ☒ Ensure all third-party processors have up-to-date agreements
- ☐ Conduct DPIAs for any new high-risk processing
- ☐ Maintain an incident log for data breaches

7. Supporting Documents Prepared

- ☒ Completed Data Audit Template
- ☒ Privacy Notice (Public)
- ☒ Data Protection Policy
- ☒ Document Retention Scheme
- ☒ Consent form (if applicable)
- ☒ Data Breach Procedure
- ☒ Data Processor Agreements (or confirmations)
- ☒ Data Protection Impact Assessment template

Approved by Full Council	Date
To be reviewed	May-27