

# Comberton Parish Council – Data Audit for Assertion 10

Date:

07-Apr-26

## 1. Overview

This data audit sets out how Comberton Parish Council processes personal data in the course of its duties and functions and should be read in conjunction with its Data Protection and Document Retention Policy. It is designed to ensure compliance with the UK GDPR and Data Protection Act 2018, promote transparency, and support accountability.

## 2. Data Inventory

| Data Category                                 | What Personal Data                                   | Purpose                      | Lawful Basis                | How is it collected                  | How is it stored   | Retention Period   | Shared with   |
|---|--|------------------------------|-----------------------------|--------------------------------------|--|--|---|
| <b>Personnel - staff</b>                      |  |                              |                             |                                      |  |  |   |
| Employment (contract, pension, CV, appraisal) | Name, address, contact details, employment history   | Employment                   | Legal Obligation & Contract | Directly from staff                  | Digitally (Microshade), hard copy,                           | 6 years post-employment  | Councillors in HR working group                       |
| CVs and applications                          | Name, address, contact details, employment history   | Recruitment                  | Public task                 | Directly from applicants             | OneDrive, Clerk's laptop, Microshade                         | 6 months after notifying unsuccessful applicants                               | Councillors in HR working group                       |
| Employment (payment of salaries)              | NI number, bank details                              | Payment of salaries          | Legal Obligation            | Directly from staff                  | Digitally and hard copy                                      | For duration of employment   | HMRC, payroll provider, PC bank signatories           |
| <b>Councillors</b>                            |  |                              |                             |                                      |  |  |   |
| Personal details                              | Contact details                                      | Legal requirement            | Public task                 | Directly from councillors            | Digitally and hard copy                                      | While councillor is in office  | n/a   |
| Register of interests                         | Pecuniary and other interests of parish councillors  | Legal requirement            | Public task                 | Directly from councillors            | Digitally and hard copy                                      | While councillor is in office  | Public via SCDC website                               |
| <b>Members of the public</b>                  |  |                              |                             |                                      |  |  |   |
| Electoral Register                            | Names, addresses                                     | Reference                    | Public task                 | Email from SCDC                      | Digitally  | Current year   | not shared  |
| Enquiries                                     | Name, contact info, content                          | Responding to queries        | Legitimate Interest         | Email, letter or telephone call      | Digitally  | 6 months   | Staff or councillors as required                      |
| Grant applications                            | Contact details, relevant details about organisation | To consider grants           | Public task                 | Grant applications                   | Digitally  | If awarded, up to 7 years for auditing purposes. If not granted, up to 1 year. | Councillors   |
| <b>Meetings</b>                               |  |                              |                             |                                      |  |  |   |
| Council Minutes & Agendas                     | Names, roles, public comments (not named)            | Governance, public record    | Legal Obligation            | Directly at meetings or submissions  | Digitally and hard copy; archives at Cambridgeshire Archives | Indefinite in archive  | Public via website, noticeboards and through Archives |
| <b>Contractors/Procurement</b>                |  |                              |                             |                                      |  |  |   |
| Invoices                                      | Name, Payment details                                | To make and receive payments | Financial puposes           | Directly from person or via the bank | Digitally, SCRIBE, hard copy                                 | 6 years  | PC bank signatories; auditors                         |

|   |                           |                                     |                  |                          |                         |  |     |
|---|---------------------------|-------------------------------------|------------------|--------------------------|-------------------------|--|-----|
| Contractors providing services to the Council | Contact details; contract | Legal requirement                   | Legal obligation | Directly from contractor | Digitally and hard copy | Life of contract and up to 7 years for auditing purposes | n/a |
| <b>Emails</b>                                 |                           |                                     |                  |                          |                         |  |     |
| Staff and councillor emails                   | Names, emails             | Communication                       | Public task      | Email                    | Digitally               | 6 months or longer if required                           | n/a |
| <b>Insurance</b>                              |                           |                                     |                  |                          |                         |  |     |
| Insurance documents                           | Insurance schedule        | Cover the PC for insurance purposes | Legal obligation | Insurance provider       | Digitally and hard copy | Until superceded by new paperwork                        | n/a |

### 3. Data Processors (External Parties)

| Processor  | Purpose                         | Data shared  | DPO/Privacy Policy in place at organisation  | Link |
|------------|---------------------------------|--|--|------|
| HMRC       | Statutory payroll reporting     | Employee pay/tax   | No DPA required. The Council shares employee data with HMRC for payroll, tax and pension purposes. HMRC acts as a data controller under relevant UK tax legislation.   |      |
| Unity Bank | Council current account 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. |      |

|                                       |   |   |   |   |
|---------------------------------------|---|---|---|---|
| NEST Pension                          | Pension provider  | Employee pension contribution/NI number                       | Yes   | <a href="https://www.nestpensions.org.uk/schemeweb/nest/nestcorporation/privacy-policy.html">https://www.nestpensions.org.uk/schemeweb/nest/nestcorporation/privacy-policy.html</a>   |
| External Auditors - PKF Littlejohn    | Financial audit   | Invoices, pay, contracts                                      | Data shared with the appointed external auditor as part of statutory audit requirements under the Local Audit and Accountability Act 2014. PKF Littlejohn acts as an independent data controller and publishes their own privacy notice | <a href="https://www.pkf-l.com/data-protection-privacy-notice/">https://www.pkf-l.com/data-protection-privacy-notice/</a>   |
| Internal Auditor - LGS                | Internal audit of council governance, financial systems, and compliance | Including access to payroll, personnel, and payment records   | Yes; no personal data retained; copy of privacy policy held by Clerk  |   |
| South Cambridgeshire District Council | Governance, planning, assistance with queries                           | Contact details - names, addresses, emails                    | Local Authority DPO   | <a href="https://www.scambs.gov.uk/about-your-council/data-and-information/customer-privacy-notice">https://www.scambs.gov.uk/about-your-council/data-and-information/customer-privacy-notice</a>   |
| Cambridgeshire County Council         | Assistance with resident queries  | Contact details - names, addresses, emails                    | Local Authority DPO   | <a href="https://www.cambridgeshire.gov.uk/council/data-protection-and-foi/information-and-data-sharing/privacy-statement/privacy-notice">https://www.cambridgeshire.gov.uk/council/data-protection-and-foi/information-and-data-sharing/privacy-statement/privacy-notice</a> |
| SCRIBE                                | For Accounts and bookings   | Contact details - names, addresses, emails, telephone numbers | Yes   | <a href="https://www.scribeaccounts.com/privacy-policy">https://www.scribeaccounts.com/privacy-policy</a>   |

#### 4. Security Measures in place

- Password-protected email accounts
- Paper files stored in locked PC cupboard in further locked premises
- Anti-virus and firewall protection provided via Avast
- Limited access to personal data internally

IT Policy and Data Protection/Document Retention policies in place and reviewed regularly

Information on Data protection included in Induction session for all new Councillors

Data Protection training regularly offered to Cllrs and Staff

Review completed of third-party (external) data processors privacy policies

## **5. Data Subject Rights**

Comberton Parish Council recognises and facilitates individuals' rights under UK GDPR, as listed in the Data Protection Policy 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