



PANGBOURNE PARISH COUNCIL

DATA AUDIT / DATA MAP

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 that processing, and record 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: Article 6.(1)(a)** the individual has given clear consent for you to process their personal data for a specific purpose.
- b) **Contract: Article 6.(1)(b)** 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: Article 6.(1)(c)** the processing is necessary for you to comply with the law (not including contractual obligations).
- d) **Vital interests: Article 6.(1)(d)** the processing is necessary to protect someone's life.
- e) **Public task: Article 6.(1)(e)** 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: Article 6.(1)(f)** 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.)

| Name and contact details | | Controller | | Data Protection Officer (if applicable) | |
|--------------------------|--|------------|--|---|--|
| Name | Pangbourne Parish Clerk | | | Name | Data Controller: Pangbourne Parish Council Data Officer: Exempt under Data Protection Act 2018 – Section 7 & Schedule 1 |
| Address | PARISH OFFICE, VILLAGE HALL, STATION RD, RG87AN | | | | |
| Email | CLERK@PANGBOURNE-PC.GOV.UK | | | | |
| Telephone | 0118 9841118 | | | | |

| Article 30 Record of Processing Activities | | | | | | | | Privacy Notices | Data Protection Act 2018 - Special Category or Criminal Conviction and Offence data |
|---|---|---|---|--|--|--|--|---|---|
| Business function | Purpose of processing | What personal information (data) is collected? | Shared with/ Access | Categories of individuals | How information is held | Retention schedule (if possible) | General description of technical and organisational security measures (if possible) | Article 9 condition for processing special category data | GDPR Article 6 lawful basis for processing |
| Allotment: register / tenancy agreements/ waiting list. | To manage and maintain allotment plots , tenancy agreements, invoicing, payments, waiting lists, inspections, and correspondence with Tenants . | Name, address , email address, telephone number/ s, plot number and payment details/ records | The Parish Council is the Data Controller. | Allotment tenants Applicants on the waiting list | Electronic and Hardcopy. | Indefinitely (plans) / 7 years for Financial Docs or while valid+7 years for plot agreements | Password protected access to council electronic devices / software. Physical documents stored in restricted access office. | Normally no special category data. Exception: if someone provides medical information as part of an adjustment request → Health data (Article 9) Likely Article 9 condition (if health appears): Employment/social protection (Art. 9(2)(b)) if relating to service provision; or Substantial public interest – equality of opportunity / reasonable adjustments (Sch.1 DPA 2018) | Contract |
| Accident records: forms | H&S compliance | Name / Address/ Telephone number/ email address/ health information | Council Network /Excel/Word/ physical document storage | Residents , MOP , Hirers, Open Space users | Electronic and Hardcopy. | 3 years min | Password protected access to council electronic devices / software. Physical documents stored in restricted access office. | YES – commonly contain special category data Health data (injuries, medical treatment) Possibly race/ethnicity if incident reporting form captures it Article 9 condition: Health & social care (Art. 9(2)(h)), or Legal claims (Art. 9(2)(f)). or Substantial public interest – H&S obligations (Sch.1 para. 1 & 2 DPA 2018) | Legal obligation |
| Accounts/ finance records /banking: Invoices, account details including names and addresses | 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 statutory financia | 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, approvals, user access logs) | N/A. The Parish Council is the Data Controller. Banks act as independent Data Controllers for own processing. The Parish Council uses financial software (Rialtas) for accounting and financial administration therefore Rialtas is a Data Processor under contract | Officers and councillors with financial authorisation Contractors and suppliers Grant recipients Residents receiving refunds or payments | Electronic and Hardcopy. Some Published | 7 years | Password protected access to council electronic devices / software. | No special category data | Contract / Legal obligation/ Public Task |
| 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 | N/a The Parish Council is the Data Controller | Public , Staff, contractors, hirers etc | Electronic and Hardcopy. Some Published | 7 years | Password protected access to council electronic devices / software. | No special category data | Public Task / Legal Obligation |

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| Agendas & Minutes | To maintain an accurate record of Parish Council and Committee decisions, discussions, and resolutions—including consultants or similar attending meetings. Minutes must comply with the Transparency Code for Smaller Authorities and the Local Government Act 1972. | Names of those who participate (where recorded). No names are recorded in minutes | N/A The Parish Council is the Data Controller. | Residents, MOP, Staff, Cllrs, Partners, Contractors | Electronic and hard format. Published | Permanent Record-Indefinitely | "No naming Conventions" observed in Minutes Password protected access to council electronic devices / software. | May include special category data if: A person's health, political views, religious beliefs or union membership are mentioned. Normally they do not but can. Article 9 condition: Substantial public interest – democratic transparency Legal claims (if relevant) | Public Task / Legal Obligation |
| Cemetery Records : Plot/memorial ownership records, applicant details | To perform our duties as a Burial Authority and maintain accurate and detailed records | Name / Address/ Telephone number/ email address/ relationship to deceased | Parish Council is the Data Controller as the Burial Authority, however in order to perform its duties it shares information with Funeral Directors, Stone Masons, Berkshire Records Office, local churches and families | Information about the deceased and living including family members, friends, bereaved, family historians, funeral partners, stone masons, gravediggers | Hardcopy Registers, Correspondence, Electronic Records | Permanent Record-Indefinitely | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No special category data | Legal Obligation / Public task |
| CCTV footage | To protect and secure public spaces and parish property within the village and deter anti-social behaviour | Images | The Parish Council is the Data Controller. Also shared with other local authorities/law enforcement. Zip Vision software provider joint data controller | Anyone | Electronic | Approx. 30 days unless there required longer for evidence | Password protected. Strictly limited access to software | Normally NOT special category data Exception: If CCTV captures health data (e.g., collapse or injury) if used for law enforcement purposes Article 9 condition (if applicable): Substantial public interest – crime prevention Legal claims (evidence) | Legal Obligation and Public Task |
| Cllrs: Declaration / register of interests and hospitality, correspondence, representatives on outside bodies | To support elected members in performing their democratic duties – such as receiving meeting documents, meeting statutory responsibilities, engaging with residents, serving on committees, 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. | N/A The Parish Council is the Data Controller. | Elected and co-opted members of the Parish Council. | Electronic and hard format. | Term of Office for ROI and AOO. Chairman and Vice Chairman AOO kept as record | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | YES – special category data CAN appear Examples: Membership of political parties → Political opinions (special category) Membership of trade unions → special category Hospitality relating to religious groups → may imply religion Article 9 condition: Substantial public interest – democratic engagement (Sch.1 DPA 2018) | Legal obligation |

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| 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 complaint, evidence, report outcomes and response/s. | Parish Council and /or The Monitoring Officer would be an independent data controller for Code of Conduct Complaints | Complainants Individuals complained about Witnesses | Electronic | As long as relevant or 7 years | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special category data | Public Task Legal Obligation |
| Contacts | To perform daily functions of the Council | Name / Address/ Telephone number/ email address | Clerk Councillors Staff | Members of Public, Residents, Contractors, Partners | Electronic, Phone | Until there is no longer an administrative requirement | Protected Phones and Office Devices | No Special category data | Public Task |
| 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 provided) | The Parish Council is the sole Data Controller for consultation and survey data it collects. SurveyMonkey or google forms operates as a Data Processor under contract. | Parish residents / members of the public, businesses and organisations and stakeholders | Electronic | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special category data | Public Task Legal Obligation Consent |
| 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 | N/a | Contractors, consultants, Sole traders and other goods and service providers. | Electronic | While valid and subject to admin requirement | Protected Phones and Office Devices | No Special category data | Public Task |
| Correspondence in: Emails /letters / notes of phone calls | Management | Name / Address/ Telephone number/ email address | Council Network | Residents, MOP, Reps of other bodies | Electronic /hardcopy | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office. | Potentially special category data depending on what the individual discloses. Typical types you may receive unsolicited: Health (e.g., disability issues, medical circumstances) Religion or political views (if complaint relates to discrimination) Article 9 condition (if applicable): Substantial public interest – democratic engagement / statutory functions Legal claims Employment/social protection (if staff matter) | Public Task |

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| Electoral Register | Management /Legal requirement | Name / Address | authorised users and purposes only | All residents of parish registered | 1 Electronic Copy held | While valid | Password protected access to council electronic devices / software. This file is further restricted with access only available to the Clerk | No special category data | Public Task Legal Obligation |
| Events: Invitees' details and contact lists | Management | Name / Address/ Telephone number/ email address | Event partnership agencies in some circumstances | Residents , MOP , Hirers, Open Space users | Council Network / physical document storage | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | Usually no special category data. Exception: Dietary requirements revealing religion (e.g., kosher/halal) Accessibility requests → health data Article 9 condition: Explicit consent or Substantial public interest – equality of opportunity | Public Task |
| Employment: Recruitment and HR documents. Staff & Volunteer records, payroll & pensions | 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. Payroll is processed by Moorepay as a Data Processor on behalf of the Parish Council. 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 on the council's website or for publicity purposes. | Payroll provider Councillors – Staffing Committee HMRC Pensions Provider External profession al HR Advisors Health & Safety Executive (e.g. Riddor incident) | Current employees. Former employees - where records retention is required). Job applications (unsuccessful applicants for a period of 6 months after end of recruitment process.) | Electronic and Paper | Recruitment Records: Unsuccessful applicants 6 months from the date of decision. Employees/ volunteers: Keep on personnel file for duration of employment, then: 7 years after employment ends Pension records: 7 years after employment. Training records 7 years after date. Safe guarding records: 75 years or until age of 100. | Password protected access to council electronic devices / software. Physical documents stored in restricted access office. Electronic access only available to the Clerk | YES – contains special category data Health (sickness forms, OH reports) Trade union membership (deductions) Ethnicity or religion (if equality monitoring collected) Article 9 condition: Employment/social protection (Art. 9(2)(b)) Health & social care (Art. 9(2)(h)) Substantial public interest – equality monitoring (Sch.1) | Contract/ Legal obligation |
| Facility Hire/ Tenants: Tenancy, services and hiring agreements. Invoices | Management / legal requirement | Name / Address/ Telephone number/ email address/bank details | The Parish Council is the Data Controller .Hall hire agreements bookings are also made through a third party site, Hallmaster who also acts as the Data Controller | Residents , MOP , Hirers, Open Space users, sports agreements | N/A | 3 years / Invoices 7 years | Password protected access to council electronic devices / software. Physical documents stored in restricted access office. | Normally no special category data. Exception: Requests for accessibility adjustments → Health data Article 9 condition: Substantial public interest – equality of opportunity | Contract |

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| 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 | N/A The Parish Council is the Data Controller. | Members of the public and Legal representatives submitting requests | Electronic | Only as long as necessary to perform the SAR request and FOI request | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special Category Data unless safeguarding | Legal Obligation |
| Grant applications: Forms & supporting evidence | To administer the Parish Council's Community Grants scheme, including assessing applications, determining eligibility and compliance with the Grants Policy, contacting applicants for further information, issuing grant agreements, processing payments, monitoring project delivery, 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 grant Payment , information about the organisation and proposed initiative together with costs. | N/A The Parish Council is the sole Data Controller. | Residents, Businesses , Community Groups, Contractors | Electronic | 7 years if successful or as long as relevant | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | Usually no special category data. Exception: Dietary requirements revealing religion (e.g., kosher/halal) Accessibility requests → health data Article 9 condition: Explicit consent or Substantial public interest – equality of opportunity | Public Task |
| 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 public realm, environmental health, elections, community safety, and responding to statutory consultations. | Personal details of residents , address , details of enquiry, complaint or other including associated correspondence , images/video if shared in relation to matter | N/A The Parish Council is the sole Data Controller. WBC also a date controller for anything passed to them | Each Council acts as an independent Data Controller for the information it receives and processes. | Electronic | As long as relevant | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special Category Data unless safeguarding | Public Task /Legal Obligation |
| 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. | Council Network /Excel/Word/ physical document storage | Residents and Members of the Public , anyone involved | Eledronic + Hardcopy | Until there is no longer an administrative requirement- any financial records 7 years and any other claims as long as necessary if health etc | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special Category Data unless safeguarding | Legal Obligation /Public Task |
| 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 | Parish Council is the Data Controller . It Contractor also responsible for the data it handles | The Parish Council is the Data Controller. IT service provider, Microsoft and website support contractors act as Data Processors under contract. Clerk IT Contractor | Electronic | As long as relevant | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special Category Data unless safeguarding | Legal Obligation /Public Task |

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| 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. | 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 u sers accessing online documents or information | Electronic | As long as relevant | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No Special Category Data unless safeguarding | Public Task Legal Obligation Consent |
| Official Requests/Complaints: emails / letter requests including FO/SAR | Management/ legal requirement | Name / Address/ Telephone number/ email address | Other local authorities/law enforcement | | District Council | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | Possible special category data, depending on content: Health (common) Race, religion, political opinions (if relevant to complaint) Article 9 condition: Legal claims (complaints escalated to disputes) Substantial public interest (public authority functions) | Public Task / Legal obligation |
| 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. | The Parish Council is a Data Controller as part of its consultee function Council Staff Public (Planning Authority portal and Parish Council web site for responses) | Officers and Councillor's, Planning applicants and agents. Members of the public submitting comments or speaking at Council meetings | Electronic and some published | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No special category data | Public Task |
| Photographs / Videos of individuals | Management / archive/ publicity | Images | Officers | Residents , MOP, Staff, Clrs, Partners, Contractors | Published in some circumstances / Other local authorities/law enforcement | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | Usually NOT special category data unless capturing: Religious symbols Trade union activity Political demonstrations Health conditions (visible disabilities) Article 9 condition: Substantial public interest – democratic/public functions Explicit consent for optional promotional photos | Public task / legitimate interest/ Consent |

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| Social Media | To share Parish Council updates, promote activities, engage with residents, answer enquiries, publish consultations, and moderate comments including replying to messages, handling comments, and reporting inappropriate content. | Usernames/profile names , comments and messages , images or video included in posts, tags or comments | The Parish Council and the social media platforms are Joint Controllers for data visible on the Council's page / platform | Members of the public engaging with Council social media messaging or commenting , and councillors / officers appearing in posts | Electronic published | Until removed | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No special category data expected. | Public task Legal Obligation Consent |
| Supplier & Contractor Information: Quotes /invoices/ insurance docs | Management / Legal requirement | Name / Address/ Telephone number/ email address/ Bank details | n/a | | n/a | 7 years / Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No special category data expected. | Contract |
| Voicemail messages/ notes of phone calls | Management | Name / Address/ Telephone number/ email address/ | PPC is the Data Controller | Any Caller | Electronic or Hardcopy | Until there is no longer an administrative requirement | Physical documents stored in restricted access office – destroyed// deleted once actioned | No special category data | Public Task / Legal obligation |
| 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 . | N/a The Parish Council is the Data Controller Shared with Council Staff | Any individual volunteering to assist the Parish Council or resident who regularly supports the Council | Electronic and hard format. | Until there is no longer an administrative requirement | Password protected access to council electronic devices / software. Physical documents stored in restricted access office | No special category data | Public Task |