

Alton Town Council – Data Audit Report

Date Completed: 25th February 2026

Clerk/Responsible Financial Officer: Tom Horwood

Reviewed By: Hayley Carter, Deputy Clerk **25th February 2026**, Full Council **4th March 2026**

1. Overview

This audit sets out how the Council processes personal data in the course. 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, staff, 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	EHDC Planning portal
Hall and Open Spaces Hire Records	Name, contact details, payment info	Hirers / Events organisers	Booking and invoicing	Contract	Hire form/email	Secure cloud storage	7 years (financial)	No
Volunteers	Name, contact details including addresses, emails and telephone numbers, health details	Volunteers	To allow contact with and safety of volunteers	Consent	Online / email	On server	Until they cease to be a volunteer	No
Staff Records	Name, address, payroll data, appraisals	Employees	Employment	Legal Obligation & Contract	Directly from staff	Secure cloud storage, locked file	7 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, EHDC and HCC if necessary to resolve query
Altonian / King's Pond / Neighbourhood Plan Mailing Lists	Name, email address	Residents	Community engagement	Consent	Online signup or email	Mailchimp (or similar)	Until unsubscribed	Mailchimp (data processor)
Surveys	Name, email address	Residents	Community engagement	Consent	Online	Survey Monkey / Mailchimp	Until unsubscribed	Survey Monkey / Mailchimp

Walking Festival	Name, email address, contact number, emergency contact details	Residents	To allow them to take part in the walks	Consent	Online through Bookwhen	Bookwhen / name and contact number downloaded onto secure server	Until unsubscribed	Bookwhen / name and contact number also shared with walk leaders
CCTV (if applicable)	Video footage	Visitors to council property	Security	Legitimate Interest	CCTV system	CCTV provider	Max 30 days unless incident	Police (if required)
Deeds and Leases	Name, address, contact number, email	Tenants	Occupying buildings / land	Legal Obligation & Contract	Email or hard copy	Secure cloud storage, locked file	Indefinitely	Appropriate body such as Land Registry, Auditor, HMRC, EHDC, HCC
Invitations to Tender / Quotations	Name, position in company, email address, contact number	Contractors / bidders	To identify best price / award work	Legal Obligation & Contract / Consent	Email or hard copy	Secure cloud storage, locked file	7 years (financial) or end of warranty	Auditor
Finance	Name, Payment details	Staff, residents and contractors	To make and receive payments	Legitimate Interest	Directly from person	Secure cloud storage, hard copy	Until no longer needed or 7 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 - Livepay	Monthly payroll	Employee details	Yes and in place until terminated	
HMRC	Statutory 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. Article 6(1)(c) – Legal obligation	
Hampshire Pension Services	Employee pensions	Employee details and payroll information	Yes and in place until terminated	
Website Host - Vision ICT	Council website	Public documents	Yes and in place until terminated	
Email Provider (e.g. Outlook/Microsoft)	Communication	Emails	Yes, MicrosoftProductandServicesDPAWWEnglishApril2025CR.pdf	
Mailchimp	Newsletters	Subscriber emails	Yes	

External Auditors - BDO	Financial audit	Invoices, pay, contracts	Data shared with the appointed external auditor (BDO) as part of statutory audit requirements under the Local Audit and Accountability Act 2014. BDO acts as an independent data controller. BDO publishes their own privacy notice	
Internal Auditor - Mulberry LAS	Internal audit of council governance, financial systems, and compliance,	All financial info including access to payroll, personnel, and payment records	Yes and in place until March 2026	
Chalvington	Computer backup and support	All electronic information	Yes and in place until terminated	
East Hampshire District Council	Governance, planning, assistance with queries	Contact details - names, addresses, emails	Yes, see their website for their privacy notices	
Hampshire County Council	Assistance with resident queries	Contact details - names, addresses, emails	Yes, see their website for their privacy notices	
Rialtas	For Accounts and bookings	Contact details - names, addresses, emails, telephone numbers	Yes and in place until terminated	https://rialtas.co.uk/privacy-statement-and-data-protection/
CCLA, Lloyds, Sum Up and Unity Bank	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.	

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

Alton Town 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	March 2027