

Horseheath Parish Council

Data Map – Assertion 10 (Digital and Data Compliance)

This Data Map is prepared to demonstrate Horseheath Parish Council’s compliance with Assertion 10 of the Annual Governance and Accountability Return (AGAR) 2025/26, relating to digital and data governance. It outlines the categories of personal data processed by the Council, their purpose, lawful basis, and the measures in place to protect and manage that data in accordance with the UK GDPR and Data Protection Act 2018.

| Category of Data | Purpose of Processing | Lawful Basis (UK GDPR) | Data Subjects | Where Data Is Held / Stored | Access & Sharing | Retention Period | Security Measures |
|---|--|--------------------------------|----------------------------------|--|--|---|--|
| Councillor contact details (names, addresses, emails, declarations) | To enable lawful council business, publish contact details and manage declarations of interest | Public Task / Legal Obligation | Elected and co-opted councillors | Council’s secure drive, official council email system, website (public contact details only) | Clerk, councillors, Monitoring Officer (interests) | As long as individual holds office + 1 year | Password-protected storage, .gov.uk email, limited access. |
| Employee records (contracts, payroll, appraisals, leave) | Employment administration and legal obligations | Contract / Legal Obligation | Clerk, employees | Encrypted cloud storage, payroll system, HMRC online account | Clerk, payroll provider, HMRC | 6 years after employment ends | Encryption, 2FA, secure deletion |

Horseheath Parish Council

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| Resident correspondence (emails, letters, online forms) | To respond to queries, service requests, or complaints | Public Task / Consent | Residents, service users | Clerk’s council email, contact form system | Clerk, relevant Councillor | 2 years (or until resolved) | Council domain email only, antivirus, restricted access |
| Supplier & contractor data (invoices, bank details, contracts) | To manage payments and procurement | Contract / Legal Obligation | Contractors, suppliers | Accounting software, Council’s secure drive, official council email system | Clerk, RFO, internal & external auditors | 7 years (financial records) | Password protection, restricted drive access |
| Financial records (budgets, payments, receipts, audits) | Financial management and statutory reporting | Legal Obligation | Clerk, RFO, councillors | Accounting system, council network | Clerk, RFO, auditors, HMRC | 7 years | Encrypted backups, limited access |
| Website content & accessibility logs | To provide public information and meet accessibility duties | Public Task / Legal Obligation | Members of the public | Council website | Clerk, web administrator | Ongoing | Accessibility compliance checks, secure hosting |
| Meeting minutes, agendas, recordings | Statutory record of council business | Public Task / Legal Obligation | Councillors, residents, officers | Website (public copies), secure drive | Clerk, councillors, public (published versions) | Permanent | Version control, backups, redaction of personal data |

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|---|---|------------------|-----------------------------------|---|--|---|-------------------------------|
| Planning and consultation responses | To respond to statutory consultations | Public Task | Residents, developers, consultees | Clerk’s drive, email | Clerk, councillors, planning authority | 2 years | Secure network storage |
| Trust fund / charity data (if sole trustee) | Manage assets and fulfil trustee duties | Legal Obligation | Trustees, beneficiaries | Clerk’s records, accounting system | Clerk, trustees, auditors | 7 years (financial), permanent (assets) | Secure storage, backups |
| Data protection requests (SARs, FOIs) | To comply with information rights | Legal Obligation | Residents, data subjects | Council’s secure drive, official council email system | Clerk, councillors (if required) | 3 years | Secure log, restricted access |

Supporting Governance Measures

To fully comply with Assertion 10, Weston Colville Parish Council maintains the following governance measures:

- Data Protection Policy (UK GDPR / DPA 2018)
- Privacy Notice
- Records Retention Policy
- IT & Email Use Policy (requiring council-owned domain e.g. @westoncolville-pc.gov.uk)
- Website Accessibility Statement (WCAG 2.2 AA)
- Data Breach Procedure

- Freedom of Information & Publication Scheme
- Training log (data protection awareness for clerk and councillors)