

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

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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

Miscellaneous reports, meetings	Position paper/notes from an Officer's meeting	Public Task	Councillors, officers	Website (public copies), secure drive	Clerk, councillors, public (published versions)	Permanent	Version control, backups, redaction of personal data
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, Horseheath 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. @horseheath-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)