

Bexhill-on-Sea Town Council – Data Audit Report

Date Completed: 2nd March 2026

Deputy Clerk/Responsible Officer: Michelle Webber

Reviewed By: Finance and Audit Committee - 11th March 2026

1. Overview

This data audit sets out how Bexhill-on-Sea Council processes personal data in the course of its duties and functions. 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, 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 | GBC Planning |
| Allotment Hire Records | Name, contact details, payment info | Hirers | Agreement and invoicing | Contract | Hire form/email | Secure cloud storage | 6 years (financial) | No |
| Annual Grant Applications | Name, contact details including addresses, emails and telephone numbers | Residents and general public, community groups | To apply for a grant for a community organisation in the Bexhill area. | Consent | Email/post | locked office & secure cloud storage | Until decision is resolved at FAC plus 3 years. | Councillors for consideration. |
| Staff Records | Name, address, payroll data, appraisals | Employees | Employment | Legal Obligation & Contract | Directly from staff | Secure cloud storage, locked file | 6 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, GBC and SCC if necessary to resolve query |
| CCTV (if applicable) | Video footage | Visitors to council property | Security | Legitimate Interest | CCTV system | DVR | Max 30 days unless incident | Police (if required) |
| Finance | Name, Payment details | Staff, residents and contractors | To make and receive payments | Legitimate Interest | Directly from person or via the bank | Secure cloud storage, hard copy | Until no longer needed or 6 years | Councillors for authorisation and monitoring. Auditors |
| Mayor's Diary | Name, email address and venue address | General public, residents, Community groups | To book the Town Mayor to make an appearance at an event. | Legitimate Interest | Email/post | Hard copy in locked cabinet/secure cloud storage | 1 year | The Mayor, Deputy Mayor, Town Clerk and Civic admin |
| Window Booking Form | Name, contact number, email address. | community groups | To book a slot in The Hub window to promote their group/organisation. | Consent | paper form or email | Hard copy in locked cabinet/secure cloud storage | 1 year | N/A |

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|--------------------------------------|--------------------------------------|------------------|---|---------|---|--|------------------------|-----------------------------|
| Applications forms for events | Name, contact number, email address. | community groups | To book a stall at a council event | Consent | paper form or email | Hard copy in locked cabinet/secure cloud storage | Until no longer needed | N/A |
| Hub Log | Name, contact number, email address. | General public | simple information enquiry usually for 3rd party (ESCC/RDC), which consent is requested for data to be passed on. | Consent | email, paper form or in person at the hub | secure cloud storage | Until no longer needed | ESCC,RDC, Highways, Police. |

3. Data Processors (External Parties)

| Processor | Purpose | Data Shared | DPA in Place? (Data Processing Agreement) | Other info |
|--|---|---|--|---|
| Payroll Provider - Local Payroll Company | 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 | |
| East Sussex Pension Fund | Monthly payroll | Employee details, pay | Yes and in place until terminated | |
| Website Host - HugoFox and Zonkey | Council website | Public documents | Yes and in place until terminated. https://eastsussexpensionfund.org/about-the-scheme/gdpr/ | |
| Email Provider (e.g. Outlook/Microsoft) | Communication | Emails | Yes and in place until terminated. | |
| External Auditors - PKF Littlejohn LLP | Financial audit | Invoices, pay, contracts | Data shared with the appointed external auditor (PKF Littlejohn LLP) as part of statutory audit requirements under the Local Audit and Accountability Act 2014. PKF Littlejohn acts as an independent data controller. PKF Littlejohn publishes their own privacy notice (see below) | https://www.pkf-l.com/data-protection-privacy-notice/ |
| Internal Auditor - Mulberry LAS | Internal audit of council governance, financial | Including access to payroll, personnel, | Yes and in place until March 2027 | |
| Waveney IT | Computer backup and support | All electronic information | Yes and in place until terminated | |
| Rother District Council | Governance, planning, assistance with queries | Contact details - names, addresses, emails | dpo@eastsussex.gov.uk | |
| East Sussex County Council | Assistance with resident queries | Contact details - names, addresses, emails | Privacy Policy – Rother District Council | |
| 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/ |

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|----------------------------------|-----------------|--|---|--|
| Lloyds Bank, CCLA 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. | |
| DocuSign | | | | |

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

Bexhill-on-Sea 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

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| Approved by Finance and Audit Date | |
| To be reviewed | Mar-27 |