

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

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.
Civic Award Nominations	Name, contact, email address, address	Organisations and residents	To nomination a group or individual for a Civic Award annually.	Consent	email or paper form	Hard copy in locked cabinet/secure cloud storage	1 year	Councillors for consideration.

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-littlejohn.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/
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

Approved by Finance and Audit Date	
DATE ADOPTED	
Date REVIEWED	Mar-27