

1. What Personal Data Do We Hold?			2. Lawful basis for holding personal data				3. Consent	4. Sharing Personal Data	5. Our internal processes					6. Action Needed
To whom or what does it relate?	What Data is it?	Including Sensitive Data?	What is it for?	Why do we have it?	Are we legally obliged to hold this data?	Lawful basis for processing: Legal contract/contractual necessity Legal obligation Public task/public interest Vital interest Consent	If the lawful basis for processing is consent - has consent been freely given and obtained?	With whom do we share this data? LIST THEM ALL	Who is responsible for keeping it?	How often is it checked?	How long do we keep it?	Where is it held?	Protection?	Action needed
Staff														
	Employment contracts	Yes	HR	Employment	No	Contract	n/a	External Professional Advisers; councillors as required as confidential information (e.g. Staffing Committee)	Clerk	On appointment	Duration of Employment plus 6 years	Electronic; personnel file	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Timesheets	No	HR	Employment	No	Contract	n/a	External Professional Advisers; councillors as required as confidential information (e.g. Staffing Committee)	Clerk	As required	current + last financial year	Electronic, personnel file, current timesheets file	Password protected PC/network; personnel file in locked cabinet/safe; current timesheets on open shelf in office	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Leave/sickness record	Yes	HR	Employment	No	Contract	n/a	External Professional Advisers; HMRC; payroll; councillors as required as confidential information (e.g. Staffing Committee/Complaints and Grievance Sub-Committee)	Clerk	As required	current + last financial year	Electronic, personnel file, recorded in timesheets	Password protected PC/network; personnel file in locked cabinet/safe; current timesheets on open shelf in office	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Discipline/Grievance record	Yes	HR	Employment	No	Contract	n/a	External Professional Advisers; councillors as required as confidential information (e.g. Staffing Committee/Complaints and Grievance Sub-Committee)	Clerk	As required	duration of employment	Electronic; personnel file	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Next of Kin details	Yes	HR	Employment	No	Contract	n/a	Named councillors in case of emergencies	Clerk	As required	duration of employment	Electronic; personnel file	Password protected PC/network; paper file in locked cabinet/safe	Named Cllrs - review how they hold data
	Accident/Injury record	Possibly - nature of accident/injury	HR	H&S	Yes	Legal obligation	n/a	External Professional Advisers; councillors as required; government agencies e.g. Health & Safety Executive	Clerk	As required	doc retention policy	Open shelf		
	Pension details	Yes	HR	Legislative requirement	Yes	Legal obligation Contract	n/a	External Professional Advisers; HMRC; pension provider; payroll/bookkeeper	Clerk	As required	duration of employment	Electronic, paper file, separate records held by payroll/bookkeeper	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy, confirm arrangements with payroll/bookkeeper
	PAYE	No	HR	Legislative requirement	Yes	Legal obligation; contract	n/a	External Professional Advisers; HMRC; payroll/bookkeeper	Clerk	As required	duration of employment	Electronic, paper file, separate records held by payroll/bookkeeper	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy, confirm arrangements with payroll/bookkeeper
	Telephone numbers and home address	No	HR	Employment	No	Contract	n/a	External Professional Advisers; HMRC	Clerk	As required	duration of employment	Electronic, paper file	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Bank details	No	HR	To pay staff salaries	No	Contract	n/a	Bank	All staff	As required	duration of employment	Bank (electronic)	Password protected access to bank; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Job applications (unsuccessful applicants)	Yes	HR	Employment	No	Contract	n/a	Councillors as required as confidential information (Staffing Committee)	Clerk	On application	until appointment made + 3 months	Paper file	Locked cabinet/safe	review files held and destroy in accordance with retention policy
	Job applications/references (successful applicants)	Yes	HR	Employment	No	Contract	n/a	Councillors as required as confidential information (e.g. Staffing Committee)	Clerk	On appointment	duration of employment	Paper file	Locked cabinet/safe	review files held and destroy in accordance with retention policy

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	Staff Appraisals	Yes	HR	Employment	No	Contract	n/a	Councillors as required as confidential information (e.g. line manager)	Clerk	As required	duration of employment	Electronic, paper file	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
	Health & safety monitoring	Yes	HR	Employment	No	Legal obligation	n/a	External professional advisors; councillors as required as confidential information (e.g. line manager, Staffing Committee); Health & Safety Executive	Clerk	Annually	duration of employment + 40 years	Electronic, paper file	Password protected PC/network; paper file in locked cabinet/safe	Individual file encryption; encrypted back-up; review files held and destroy in accordance with retention policy
Councillors	Declarations of Interest	Yes	Democracy	Legislative requirement	Yes	Legal obligation	n/a	Public	All Staff	At election; annually; when updated by councillors	term of office	Electronic, paper files; website	n/a	
	Telephone numbers and addresses	No	Council admin	To carry out Council functions	No	Public task	n/a	Public EXCEPT where Councillor requests non-disclosure	All staff	At election	term of office	Electronic, paper files, website (except where Councillor has requested non-disclosure)	n/a	Redact from public circulation lists/emails
	Council email Addresses	No	Council admin	To carry out Council functions	No	Public task	n/a	Public	All staff	At election	term of office	Electronic, paper files, website	n/a	
	Personal email addresses	No	Council admin	Councillor has declined Council email address To carry out Council functions	No	Public task	n/a	Public EXCEPT where Councillor requests non-disclosure	All staff	At election	term of office	Electronic, paper files	n/a	Redact from public circulation lists/emails where Councillor requests non-disclosure
	Attendance at meetings record	No	Council admin	To carry out Council functions	No	Public task	n/a	Public	All staff	Annually	term of office	Electronic, paper files	n/a	
	Party membership	Yes	Council admin	Process election results	No	Public task	n/a	Public	All staff	At election	term of office	Electronic, paper, website	n/a	
Contractors/Suppliers														
	Contact details	No	Business	Contact	No	Contract	n/a	Councillors as required; external professional advisers	All staff	When appointed	2 years from last contract	Electronic, paper files	n/a	review files held and destroy in accordance with retention policy
	Invoices	No	Business	Payment	No	Contract	n/a	Public Inspection on audit; bookkeeper	All staff	On payment	doc retention policy	Electronic, paper files	n/a	review files held and destroy in accordance with retention policy
	Purchase orders	No	Business	Purchasing	No	Contract	n/a		All staff	On raising	doc retention policy	Electronic, paper files	n/a	review files held and destroy in accordance with retention policy
	Quotations	No	Business	Purchasing	No	Contract	Yes	Public inspection on audit; councillors as required; public - in agenda packs where Council/Committee considers quotations	All staff; councillors who receive the data	On raising	doc retention policy	Electronic, paper files	n/a	review files held and destroy in accordance with retention policy
	Bank Account details	No	Business	Payment	No	Contract	Yes	Bank	All staff	On payment	doc retention policy	Bank, electronic, paper files	n/a	review files held and destroy in accordance with retention policy
	Insurance	No	Business	Contract	No	Contract	Yes	External professional advisers	All staff	On appointment	doc retention policy	Electronic, paper files	n/a	review files held and destroy in accordance with retention policy
	References and qualifying information	No	Business	Contract	No	Contract	Yes	Councillors as required; external professional advisers	All staff; councillors who receive the data	On appointment	doc retention policy	Electronic, paper files	n/a	review files held and destroy in accordance with retention policy
Members of the public														
	Names and contact information - specific enquiries to the Council/casework	Sometimes	Communication	Provided by members of the public. To process enquiry/casework	No	Public task/consent	Yes	With consent - staff and councillors as required and third parties Without consent - nobody	All staff; councillors who receive the data	On receipt	doc retention policy	Electronic, paper file, councillors' records	Redaction of personal data from electronic files and before circulation/copying of paper files	review files held and destroy in accordance with retention policy
	Freedom of Information requests	Sometimes	Communication	To process request	Yes	Legal obligation	n/a	External Professional Advisers	Clerk	On receipt	doc retention policy	Electronic, paper file	Password protected PC/network; paper file in locked cabinet/safe	review files held and destroy in accordance with retention policy
	Electoral Register	No	Council admin	To identify electors at Annual Town Meeting	No	Public task	n/a	Public Document required by law, which we choose to hold.	All staff	On receipt	1 year	Electronic	n/a	

Horsforth Town Council - Data Audit

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	Members of public co-opted onto Council Committees/other groups - names and contact details	No	Council admin	To carry out Council functions	No	Consent	See Action needed	Names become public knowledge Other data - councillors and third parties provided consent given; without consent - nobody	All staff; councillors who receive the data	On receipt	For duration of membership	Electronic, paper files	Redaction of personal data from electronic files and before circulation/copying of paper files	Obtain consents needed; review files held and destroy in accordance with retention policy
	The Heart of Horsforth Awards Scheme nominator names and contact details	No	Council admin	To carry out Council functions	No	Consent	See Action needed	Names - Councillors as required (e.g.- Community and Environment Committee); person nominated for the award if successful. Contact details - confidential	All staff; councillors who receive the data	On receipt	doc retention policy	Electronic, paper files	Contact details redacted from electronic copies and before circulation/copying of paper files	review files held and destroy in accordance with retention policy; revise nomination form to include consent request
	The Heart of Horsforth Awards Scheme - nominee names and contact details; information relating to their achievements and life	Sometimes	Council admin	To carry out Council functions	No	Public task/ consent Note: parental consent needed for young achievers	See Action needed	Names and some information on their achievements become public knowledge Contact details - confidential	All staff	On receipt	doc retention policy	Electronic, paper files	Contact details redacted from electronic copies and before circulation/copying of paper files	review files held and destroy in accordance with retention policy; ask for consent/parental consent at time of notifying of successful nomination
	Consultation responses - names and contact information	No	Democracy	To carry out Council functions - where public consultation is required	No	Legal obligation/Public task	n/a	Statutory bodies as required	All staff	On receipt	final outcome + 1 year	Electronic, paper files	Contact details redacted from electronic copies and before circulation/copying of paper files	review files held and destroy in accordance with retention policy; consultation documents to include consent questions
	Public attendance register at meetings	No	Council admin	Council record	No	Public task	n/a	Nobody without consent	All staff	On receipt	doc retention policy	Paper file	Locked cupboard	
Community Organisations														
	Community List - names and contact information	No	Public info	To provide public information; to process the list	No	Consent	Yes	Public	All staff	Annually	Whilst included on Community List	Electronic, paper file	n/a	review files held and destroy in accordance with retention policy
	Grant/Sponsorship Application Forms - names and contact details; bank details	Sometimes	Council admin	Service to Community; to process applications	No	Consent	See Action needed	Names become public knowledge; other data is confidential	All staff	On receipt	doc retention policy	Electronic, paper file	Contact details redacted from electronic copies and before circulation/copying of paper files	review files held and destroy in accordance with retention policy; revise application form to include consent request
Invitation Lists														
	Names and contact information	No	Civic events	Invitations (e.g. Civic Service, Christmas Switch-On event)	No	Public task	n/a	Nobody without consent	All staff	Annually	Ongoing	Electronic, paper file	Password protected PC/network; paper file in locked cabinet/safe	review information held and destroy in accordance with retention policy
Planning & Licensing														
	Applications, comments, decisions and appeals	No	Planning & licensin	Council function - to comment on planning & licensing matters	No	Public task	n/a	Public information - available on Leeds City Council Planning Portal	All staff	On receipt	1 year	Personal data is not held but is accessible via hyperlinks to the Leeds City Council Planning Portal; hyperlinks held electronically	n/a	
General Contacts														
	Name and Email Addresses (business/organisation)	No	Contact	To facilitate communications in order to carry out Council functions	Yes	Privacy Notice	n/a	All staff/councillors as required	All staff	As required	Ongoing	Electronic, paper files	Password protected PC/network; paper file in locked cabinet/safe	
Council Profile	Large Town Council													
	Councillors: 22													
	Staff: 1 Clerk Full -time; 1 admin assistant part-time													
	Electorate: 15,380													
	Precept 2023/2024: £126,035													
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