Redruth Town Council
Data Audit Policy

Updated October 2026

Document Controls	
Owner:	Data Protection Officer
Reviewed by:	Full Council

Date	**Initials**	**Revisions made**
October 2026	Chairman – Redruth Town Council	FINAL

If you have any queries or suggested amendments to this document, please contact the Owner named above. Please archive all historic versions of this notice for audit

1 Introduction & Scope

1.1 The purpose of a data audit is to identify the data that the Town Council processes, identify the purpose and lawful basis for that processing, and record who has access to the data.

1.2 It is an important stage in assessing whether there are any risks associated with the Town Council's data processing activities and ensuring compliance with the Data Protection Act 2018, Data Use and Access Act 2025 and UK GDPR.

2 Lawfulness of Processing

2.1 The lawful bases for processing are set out in Article 6 paragraph 1 of the UK GDPR legislation. At least one of these must apply whenever you process personal data:

a) **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

b) **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

c) **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

d) **Vital interests:** the processing is necessary to protect someone's life.

e) **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

f) **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

2.2 The table below confirms the legative basis of the Town Council processing personal data that it holds.

ADMINISTRATION & GOVERNANCE							
Subject	**Purpose of processing**	**Categories of Personal Data**	**How information is held**	**Joint Controllers**	**Categories of Individuals**	**Lawful basis for processing**	**Shared with/ Access**
Employees	To administer employment, recruitment, payroll, pensions, performance management, statutory reporting, training, leave & sickness management, time recording, HR and compliance with employment law and health and safety legislation/ monitoring. Administration of employee salaries, statutory deductions, payroll and pension contributions. Data is provided	Name, postal address, email address, telephone number, dates of birth, national insurance number, employment history, education, skills, knowledge and qualifications in accordance with job application. Salary and bank details. Employment contracts, performance (appraisal) records, discipline/grievance record, next of Kin details, attendance and leave records. Sickness and medical	Electronic	N/A The Town Council is the Data Controller	Current employees. Former employees - where records retention is required). Job applications (unsuccessful applicants for a period of 6 months after end of recruitment process.)	Article 6(1)(b) Article 6(1)(c) Article 6(1)(e) Article 6(1)(a) - publication of images	Staff HMRC Pensions Provider External Professional HR Advisors Health & Safety Executive (e.g. Riddor incident)

	directly by employees and job applicants, and Occupational Health providers (where applicable), and HMRC, pension providers and other statutory bodies. Occupational Health providers (where applicable), and HMRC, pension providers and other statutory bodies.	information (where required for statutory or employment purposes). Equal opportunities monitoring data (where collected). Health information necessary for statutory sick pay, health and safety, risk assessments, and occupational health referrals. Images published on the council's website or for publicity purposes.					
Councillors	To support elected members in performing their democratic duties- such as receiving meeting documents, meeting statutory responsibilities, engaging with residents, serving	Name, home address, email address (council & personal), telephone number(s), declaration of interests, register of interests, copies of DBS certificates,	Electronic and hard format.	N/A The Town Council is the Data Controller.	Elected and co-opted members of the Town Council.	Article 6(1)(c) Article 6(1)(e) Article 6(1)(a)	Public (Except where non-disclosure is agreed)

	on committees, and adhering to transparency and governance standards. Additionally, this processing aids in publishing information required by the Localism Act 2011 and the Transparency Code.	signed statements of assurance, attendance records, voting at meetings, images published on the council's website or for publicity purposes.					
Volunteers	To Coordinate and manage volunteers for Town Council projects, activities and initiatives; share relevant information; ensure health, safety, and safeguarding compliance; and keep records of participation. Volunteers provide data directly, or parents/guardians do so for those	Names and email address, Telephone numbers, Emergency contact details (where collected). Information for risk assessments and safeguarding (if applicable). Parent/guardian contact details for volunteers under 18.	Electronic and hard format.	N/A The Town Council is the Data Controller.	Parish residents and other Volunteers including under 18's participating in supervised activities with the Council.	Article 6(1)(e) Article 6(1)(a) - Consent for publication of Images	Council Staff

	under 18 when needed.						
Audit and Governance	To receive and inspect the Councils arrangements for audit and governance forming part of the Annual Governance & Accountability Return (AGAR) which includes an Annual Governance Statement and Accounting Statements.	Names and signatures of the Clerk, RFO/DTC and Chair of Council	Electronic and hard format	N/A The Town Council is the Data Controller.	Members of the public	Article 6(1)(c)	Public Councillors Council Staff
Correspondence	To facilitate Town Council communications and business, including responding to enquiries, sharing information, requesting actions, and fulfilling statutory or public duties.	Names, postal addresses, email addresses, telephone numbers and social media.	Electronic	N/A	Members of the public Contractors and service providers Organisational representatives	Article 6(1)(e) Article 6(1)(c) Article 6(1)(a)	Council Staff

Complaints Handling/ Code of Conduct Complaints	To administer complaints from residents, carry out investigations, liaise with Monitoring Officer at Cornwall Council (for councillor conduct complaints), and maintain records.	Names and contact details, details relating to the nature of complaint, evidence, report outcomes and response/s.	Electronic	The Monitoring Officer would be an independent data controller for Code of Conduct Complaints	Complainants Individuals complained about Witnesses	Article 6(1)(e) Article 6(1)(c)	Town Clerk Complaints Handling/Code of Conduct Complaints
Freedom of Information Requests and Subject Access Requests	To process legislative information requests, respond within legal deadlines, and maintain records for audit and legal compliance.	Name, contact details, identity documents (for SARs only) and the request	Electronic	N/A The Town Council is the Data Controller.	Members of the public and Legal representatives submitting requests	Article 6(1)(c)	Town Clerk
Statutory Consultations - Neighbourhood Planning and Other Legislative Consultations	To receive representations as part of formal consultations, publish responses as mandated by law, summarise key issues, and submit relevant materials.	Names, postal address, email address and subject matter representations submitted	Electronic	Planning Authority - statutory planning functions. Neighbourhood planning consultants serve as Data Processors under contract, handling consultation	Residents Businesses Statutory consultees Other stakeholders participating in consultations	Article 6(1)(c) Article 6(1)(e)	Staff Councillors Neighbourhood planning consultants

				responses and preparing reports for the Town Council.			
Planning Applications	The Town Council is a statutory consultee for planning applications	Names and contact details of planning applicants, agents, planning authority officer details, responses, decisions and reports.	Electronic	The Town Council is a Data Controller as part of its consultee function.	Officers and Councillors Planning applicants and agents. Members of the public submitting comments or speaking at Council meetings	Article 6(1)(c)	Council Staff Public (Planning Authority portal and Town Council web site for responses) Councillors
Minutes	To maintain an accurate record of Town Council and Committee decisions, discussions, and resolutions- including consultants or similar attending meetings. Minutes must comply with the Transparency	Names of consultants who participate (where recorded).	Electronic and hard format.	N/A The Town Council is the Data Controller.	Members of the public, Councillors and Officers in attendance at the meeting.	Article 6(1)(e)	Public Councillors and Council staff

	Code for Smaller Authorities and the Local Government Act 1972.						
Contractors, Suppliers and Service Providers	The procurement of goods and services, management of contracts, invoicing and payments, evidence of Procurement Act and Financial regulations compliance, and maintain audit records.	Name of company/ representative, business contact details including email address and telephone number Bank account information (for payments). Contract particulars	Electronic	N/A	Contractors, consultants, Sole traders and other goods and service providers.	Article 6(1)(b) Article 6(1)(c)	Council staff (Authorising Officers) Councillors
Insurance Claims	To manage reported incidents, notify insurers, review claims, liaise with claimants, and retain records for statutory periods.	Names and contact details, incident details, injury details, witness information, Photographs/ videography and correspondence between parties and insurers.	Electronic	Town Council insurance Provider acts as an independent controller.	Claimant including legal representatives, witness/es, and insurers.	Article 6(1)(c) Article 6(1)(e)	Town Clerk Deputy Town Clerk
Information Sharing with Principal	The Town Council collaborates with	Personal details of residents, address, details of enquiry,	Electronic	Each Council acts as an	Members of the public, volunteers or	Article 6(1)(e)	Town Clerk Councillors

Council/ Other Local Authorities	principal authorities to fulfil statutory and public duties. This involves addressing resident enquiries, reporting issues, managing Highways matters, participating in planning, handling safeguarding referrals, sharing information on public realm, environmental health, elections, community safety, and responding to statutory consultations. Also the CCTV monitoring service with its own data sharing agreement in place.	complaint or other including associated correspondence, images/video if shared in relation to matter		independent Data Controller for the information it receives and processes.	contractors where relevant	Article 6(1)(c) notices). Article 6(1)(a)	

IT contractor: Technical support, licensing, security, data Storage, and Email Hosting.	To provide secure and effective IT Services for the Town Council.	Officer and Councillor names, job titles and contact details, email content and metadata, stored data (technical support only), backup files	Electronic	The Town Council is the Data Controller. IT service provider, Microsoft and website support contractors act as Data Processors under contract.	Councillors, Staff. Correspondence or documents from members of the public, Contractors and organisations.	Article 6(1)(c) Article 6(1)(e) Article 6(1)(b)	Town Clerk Deputy Town Clerk IT Contractor
Website Analytics, Cookies and Server Logs	To maintain the secure and effective operation of the Town Council's website, monitor performance, analyse usage to improve accessibility and user experience and ensure system security.	IP addresses, device and browser information, web page/site analytics.	Electronic	The Town Council is the Data Controller for information collected via its website. The website hosting provider acts as a Data Processor for server logs and security functions.	Visitors to the websites, members of the public submitting contact forms and users accessing online documents or information	Article 6(1)(e) Article 6(1)(c Article 6(1)(a))	Town Clerk Web site Contractor / hosting provider
Social Media	To share Town Council updates,	Usernames/profile names, comments	Electronic	The Town Council and	Members of the public engaging	Article 6(1)(e)	Council Staff

	promote activities, engage with residents, answer enquiries, publish consultations, and moderate comments including replying to messages, handling comments, and reporting inappropriate content.	and messages, images or video included in posts, tags or comments		the social media platforms are Joint Controllers for data visible on the Council's page/ platform	with Council social media messaging or commenting, and councillors/ officers appearing in posts	Article 6(1)(a) Article 6(1)(f)	Communications Manager
Community Consultations and Surveys	To collect and analyse feedback and insight from parish residents and stakeholders to guide Town Council decisions, planning, strategy, policy, services, projects, and consultations. This includes issuing surveys, gathering responses, analysing data,	Names (where provided voluntarily), postal address or postcode (for geographic verification), email address or telephone number (only if supplied for follow-up contact), written comments, opinions or qualitative feedback, demographic or contextual information (only if voluntarily	Electronic	The Town Council is the sole Data Controller for consultation and survey data it collects. Qualtrics operates as a Data Processor under contract.	Parish residents/ members of the public, businesses and organisations and stakeholders	Article 6(1)(e) Article 6(1)(a)	Council Staff – Community Liaison Manager Councillors Public - Results/ reports

	reporting results, and retaining records for governance, audit, and funding.	given)					
Newsletters	To provide updates about the work of Redruth Town Council, including the latest news, important announcements, and agendas for upcoming council meetings to those that have opted to receive. N.B: Individuals may opt out at any time.	Name, email address, company (optional) and preferred format	Electronic	N/A Email distribution Via Mailchimp acting as a Data Processor under contract.	Residents, local organisations and other individuals opting to receive Town Council updates.	Article 6(1)(a)	Council Staff
Media	To issue media information, statements, public notices (Notice of election) and other authorised communications on behalf of the Town Council to	Names of Journalists, editors or media contacts, email addresses, telephone numbers, organisation details and subsequent correspondence	Electronic	N/A	Journalists, Editors, Press officers, other Media representatives	Article 6(1)(e) Article 6(1)(a)	Council Staff – Communications Manager Councillors

	local, regional and national media outlets.	received.					

FINANCIAL							
Subject	**Purpose of processing**	**Categories of Personal Data**	**How information is held**	**Joint Controllers**	**Categories of Individuals**	**Lawful basis for processing**	**Shared with/ Access**
Procurement, Tenders and Request for Quotations	To obtain quotations, Evaluate tenders, appoint suppliers, manage public procurement obligations, and retain records for audit and transparency.	Names of bidders, business contact details, email addresses and phone numbers, quotations, pricing and tender submission documentation, insurance, health and safety documentation etc.	Electronic	N/A The Town Council is the Data Controller.	Contractors, suppliers and service providers	Article 6(1)(b) Article 6(1)(c)	Town Clerk RFO/Deputy Town Clerk Councillors Public - contracts register - web site Successful tendering contractor is published on Find a Tender
Financial Administration and Banking Records	To administer the Town Council's financial operations, including	Names of payees, suppliers, and recipients, Bank account details, payment	Electronic	N/A. The Town Council is the Data Controller.	Officers and councillors with financial authorisation	Article 6(1)(c) Article 6(1)(e)	Council Officers Councillors

	payments, invoices, receipts, purchase orders, budget monitoring, audit trails, bank reconciliation, financial reporting, and compliance with statutory financial regulations.	references and transaction data, invoices, receipts and remittance advice, email addresses and contact details, authorisations Audit trail information (signatures, approvals, user access logs)		Banks act as independent Data Controllers for own processing. The Town Council uses financial software (Xero) for accounting and financial administration therefore Xero is a Data Processor under contract	Contractors and suppliers Grant recipients Residents receiving refunds or payments		Public - AGAR/ Payment approvals etc.
Grant Applications	To administer the Town Council's Community Grants scheme, including assessing applications, determining eligibility and compliance with the Grants Policy, contacting	Name of applicant (individual or lead organisational contact), Postal address, Email address, Telephone number, Position and authorisation within organisation,	Electronic	N/A The Town Council is the sole Data Controller.	Authorised contact for organisation submitting the grant application.	Article 6(1)(b) Article 6(1)(c) Article 6(1)(e) Article 6(1)(a)	Council Staff RFO/Deputy Town Clerk Councillors

	applicants for further information, issuing grant agreements, processing payments, monitoring project delivery, and publishing required transparency information.	Bank account details for grant Payment, Information about the organisation and proposed initiative together with costs.					

COUNCIL SERVICES							
Subject	**Purpose of processing**	**Categories of Personal Data**	**How information is held**	**Joint Controllers**	**Categories of Individuals**	**Lawful basis for processing**	**Shared with/ Access**
Allotments	To manage and maintain allotment plots, tenancy agreements, invoicing, payments, waiting lists, inspections, and correspondence with Tenants.	Name, address, email address, telephone number /s, plot number and payment details/ records	Electronic	The Town Council is the Data Controller.	Allotment tenants Applicants on the waiting list	Article 6(1)(b) Article 6(1)(c) Article 6(1)(e)	Council staff