

**Wheatley Hill Parish Council
Data Audit Policy and Annual Audit Plan**

1. Purpose of This Policy

Wheatley Hill Parish Council carries out regular data audits to ensure that all personal information is handled lawfully, securely, and consistently. Our aim is to identify and resolve data-handling issues, ensure compliance with data retention and disposal requirements, maintain consistent standards, and demonstrate accountability.

2. Scope of the Audit

The audit covers all information held or processed by the Council, including digital files, emails, paper records, and data shared with third parties.

3. Roles and Responsibilities

The Parish Clerk/DPO leads the audits, maintains a data register, and ensures compliance.

Employees and Councillors support audit activities and follow procedures.

4. Audit Frequency

Full Data Audit: Annually

Financial Audit (AGAR): Annually (April)

Targeted Audits: As required

Retention and Disposal Review: Annually

Administrative Checks: Every 3–6 months

Training and Awareness Review: As needed

5. Audit Areas

Data Mapping, Security, Retention & Disposal, Data Sharing & Third Parties, Training & Awareness, Findings & Actions.

6. Reporting

Audit reports summarise findings, risks, and recommendations and are submitted to Council.

7. Sign-Off

Internal Auditor (AGAR) and Parish Clerk / DPO confirm completion and monitoring.

8. Annual Audit Plan

Audit Type	Frequency	Responsible	Notes / Output
Full Data Audit	Annually	Parish Clerk/DPO	Comprehensive review of all data, retention, and security. Report to Council.

Financial Audit (AGAR)	Annually (April)	Internal Auditor Clerk/DPO	Review of financial and related records. Issues tracked by Clerk / DPO.
Targeted Audit	As identified	Parish Clerk/DPO	Focus on high-risk or new systems. Recommendations issued.
Retention & Disposal Check	Annually	Parish Clerk/DPO	Ensures data is kept or deleted according to retention schedule.
Admin Checks	Every 3–6 months	Admin Staff	Spot-checks of emails and routine records. Issues reported to Clerk/DPO.
Training & Awareness Review	As needed	Parish Clerk/DPO	Ensure councillors and staff are GDPR aware.
Data Sharing / Third-Party Review	Annually or as needed	Parish Clerk/DPO	Review contracts, agreements, and DPIAs.
Risk Review	Mid-year & Year-end	Parish Clerk/DPO	Update risk register with audit findings and track progress.

9. Policy Review

Reviewed annually.

Quick Audit Checklist

Audit Type: Full/Targeted/Retention

1. Data Mapping: Identify data held, purpose, ownership, and storage location.
Examples: resident contact details, employee records, Councillor information, minutes, complaints.
2. Security: Passwords and access controls, locked storage for paper records, backup arrangements.
3. Retention & Disposal: Confirm timely and secure deletion of outdated data.
Examples: employee files (6 years), invoices (12 years),
4. Data Sharing/Third Parties: Ensure agreements exist and contractors follow GDPR.

5. Training & Awareness: Confirm employees, Councillors, and volunteers understand responsibilities. Schedule refresher training if required.

6. Findings & Actions: Record issues, assign actions and deadlines.