



Mablethorpe & Sutton Town Council

Data Audit

2025/26

Legislation

The purpose of a data audit is to find out what data Mablethorpe & Sutton Town Council processes, what is it used for, where it is located and who has access to it.

It is an important step in assessing whether there are any risks in the type of processing the Council carries out and operates within the:

- Data Protection Act 2018
- Data Use and Access Act 2025

What is a Data Audit?

Retention of information 'just in case' it could be useful doesn't mean it's necessary or proportionate to hold on to it. The Town Councils benefits by giving its records two annual 'spring cleans' (February and August) and we delete or destroy old data sets that have built up over the past and during the present administration periods.

Where staff or Member changes take place, a formal handover processes are in place to ensure staff moving on hand over relevant data to new staff and they delete or destroy the rest

When elected Member changes take place (i.e., every 4 years following an ordinary election- or at a subsequent by-election) outdated email accounts and records are deleted and information contained within is destroyed.

Parish & Town Councils may struggle with knowing how to share data appropriately with services they provide, and untrained staff and elected Members may worry about potential conflicts between different pieces of legislation and aren't sure whether to publish residents' names in council minutes, or how to redact them. Mablethorpe & Sutton Town Council recognises this and as such staff and Member training is encouraged and it follows the principles in the ICO's 'Six steps to Data Sharing in Local Councils' available at:

[www.efaidnbmnnnibpcajpcglclefindmkaj/https://ico.org.uk/media2/migrated/2615580/parish-councils-six-steps-fact-sheet.pdf](https://ico.org.uk/media2/migrated/2615580/parish-councils-six-steps-fact-sheet.pdf)

Document	Personal detail(s) held	Purpose	How information is held	Legal Basis	Length of time to be held	Shared with / Access	Purpose for sharing
Allotments – Sutton on Sea							
Tenant details	Contact details (tenancy agreements)	Contractual - Allotments Act	Electronically / Hard Copy	Allotments Act 1908.	Up to 7 years after plot vacated for audit purposes	Not shared externally. Staff access only	n/a
Waiting list	Contact details	Prospective tenant(s)	Electronically / Hard Copy	Customer request	Until plot allocated or request to be removed	Not shared externally. Staff access only	n/a
Burial Records							
Exclusive Rights of Burial (EROB)	Contact details of family members	Retain in case of issues (headstone / burial)	Electronically / Hard Copy	Cemeteries Clauses Act 1847. Local Authorities Cemeteries Order Act 1977.	Indefinitely	Not shared externally. Staff access only	n/a
Burials and cremations	Details of residency, DOB, Place & Date of Death, Next of kin	Accurate record keeping	Electronically / Hard Copy	As above	Indefinitely	Not shared. Staff access only	n/a
CCTV Images and Data							
Images and Data	Images	Crime & the prevention of.	Electronically	Crime & Disorder Act 1998 (s.17).	As necessary.	Not shared. ELDC may share with police / crime agencies.	n/a
Contractors & Procurement							
Contractors providing goods or services	Contact details, tender notices, contracts between both parties.	Contractual	Electronically / Hard Copy	Local Government Act (LGA) 1972. Procurement Act 2023.	Life of the contract and up to 7 years for auditing purposes	Not shared externally. Staff access only	n/a

Document	Personal detail(s) held	Purpose	How information is held	Legal Basis	Length of time to be held	Shared with / Access	Purpose for sharing
Invoices	Goods & services received and supplied	Financial records. AGAR & Audit	Electronically. Hard copy.	LGA 1972. Account and Audit Act 2015. Procurement Act 2023.	Up to 7 years for auditing purposes	Not shared externally. Available for public review upon request.	Account and Audit Act 2015.
Payments for goods and services	Bank Details. Remittance Advices.	Payment of invoices	Electronically. Hard copy.	Contractual. LGA 1972. Account and Audit Act 2015. Procurement Act 2023.	Whilst providing services and up to one year after end of contract (7 years for VAT).	Not shared externally. Staff access only.	Account and Audit Act 2015.
Correspondence (General)							
Correspondence from the public (excluding email)	Personal details (i.e., name, address, contact number)	To respond to correspondence	Electronically. Hard copy.	Public request	Up to 6 months or destroyed once matter(s) are satisfactorily dealt with.	Staff / elected Members (as necessary)	To assist and aid electorate.
Planning Applications	Personal details (i.e., name, address, contact number)	To respond to planning application submissions	Electronically	Statutory Consultee. Town & Country Planning Act 1990.	Until town council has submitted corporate response	Staff, Cllrs and public. Information publicly available elsewhere (ELDC website)	Planning process.

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Councillors							
Application (co-option)	Contact details and written application	Reference	Electronically. Hard copy.	Public request	For 3 months or until vacancy filled	Not shared externally. Staff access only.	n/a
Contact information	Individual Cllr contact information	Reference – for public contact (details redacted when requested)	Electronically. Hard copy. Website. Noticeboards.	Public request	Updated and amended as changes dictate. Retained for up to 1 year after leaving	Public via website and noticeboards	Public contact information.
Declaration of Interest forms (DPI)	Pecuniary and Non-Pecuniary Interests of all Cllrs	Legal Requirement	Electronically. Hard copy. Website.	Legal requirement – Localism Act 2012	Whilst individuals remain an elected Member	M&STC website. ELDC website.	Public Information.
Emails							
Staff and Cllr using gov.uk email addresses	Names Email addresses Personal information	Information receiving and sharing. Communication between staff, Cllrs, Statutory bodies, contractors and the public.	Electronically.	Contractual. Public request	Up to 6 months (some emails may be kept longer if legally necessary)	Town Council. External bodies (upon receipt of legitimate request).	Usually n/a. Legal use only
Insurance							
Insurance policy, certificates and associated documents	Insurance schedule(s).	To evidence sufficient and mandatory insurance cover for council activities and services.	Electronically. Hard copy.	Employers' Liability (Compulsory Insurance) Act 1969.	Indefinitely.	Certificates published on websites and noticeboards. May be shared with statutory agencies / Authorities.	Legal requirement. Contractual.

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Market Traders							
Details of weekly and specialist market traders.	Individual traders' contact information	Contractual. Reference. Legal requirement.	Electronically. Hard copy.	Part III, Food Act 1984.	7 years after expiry of agreement or lease	Necessary documents shared with other agencies Authorities.	Legal requirement. Contractual.
Meetings and Administration							
Agendas and Minutes.	Agenda and Minutes pertaining to meetings	Legal requirement. Record of minutes.	Electronically. Hard copy. Website.	Local Government Act 1972.	Indefinitely	Electronically. (TC PC's). Website. Hard copies are retained in office. Signed copies (minutes) retained in fireproof cabinets.	Public information. Openness & transparency.
Members of the public							
Electoral Register.	Names and addresses	Reference.	Electronic copy only. Only to be accessed for legitimate reasons.	Electoral Registration and Administration Act 2013	Current year only (until new or updated register is issued by ELDC).	Not shared – ELDC share the document	n/a
Enquiries from Members of the Public	Contact details / query / complaint	To request information, pass on information or make statement / complaint	Electronic (emails). Hard copy (letters).	Local Government Acts 1972 / 1986 / 1988. Local Gov (Electronic Communications) Order 2015.	Various – dependent on query / complaint.	Not shared externally. Staff / Cllr access only.	Usually n/a. May be shared under FOI. redacted as necessary to comply with legislation.

Document	Personal detail(s) held	Purpose	How information is held	Legal Basis	Length of time to be held	Shared with / Access	Purpose for sharing
Members of the public continued							
Grant Applications	Contact details	Reference.	Electronically. Hard copy			Not shared externally. Staff / Cllr access only	
Beach Hut Bookings	Contact details	Reference. Contractual.	Electronically.	Local Government Act 1972 / 1986 / 1988. Local Government (Electronic Communications) Order 2015.	7 Years	Not shared externally. Staff access only. Internal Auditor (sample only).	Usually n/a. VAT requirement. Account and Audit Act 2015.
Personnel (Staff)							
Employment documents (e.g. contract, appraisal, pension etc.)	Contact details. NI number Personal details. Employment history. Qualifications.	Managing employment of employees	Electronically. Hard copy.	Employment Rights Act 1996	6 years after employment has ceased	Not shared externally.	n/a
Job applications	Contact details. NI number Personal details. Employment history. Qualifications.	Recruitment	Electronically. Hard copy.	Equality Act 2010. Data Protection Law	6 months after vacancy filled after notifying unsuccessful applicants.	Not shared.	n/a
Document	Personal detail(s) held	Purpose	How information is held	Legal Basis	Length of time to be held	Shared with / Access	Purpose for sharing

Payment of salaries	Personal details	Payment of salaries	Electronically	National Joint Councils (NJC)Contract of employment.	Contractual	Not usually shared. Senior officer salaries published on website	Usually n/a. Local Government Transparency Code 2015.
Tenants							
Details of Town Council tenants (concessions).	Contact Details and lease agreements	Legal requirement.	Electronically. Hard Copy.	Landlord and Tenant Act 1954.	15 years after expiry of agreement / lease	Not shared. Staff access only.	n/a

This policy will be reviewed annually or as legislation dictates or best practice determines.