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## **MELTHAM TOWN COUNCIL DATA AUDIT**

**DATE AUDITED: 26<sup>TH</sup> FEBRUARY 2026**

**APPROVED AT FULL COUNCIL: 23<sup>RD</sup> MARCH 2026, MIN REF: 25/223, item 10.1**

**DATE OF NEXT REVIEW: FEBRUARY 2027**

Meltham Town Council processes personal data for the following reasons:

1. Staff administration
2. Council / Councillor administration
3. Provision of services (allotments)
4. Grants administration
5. Provision of information
6. Dealing with general enquires
7. Monitoring / Crime Prevention
8. Contracting with suppliers, companies and other organisations

Storage locations:

- Office filing cabinet
- Office
- Archive records in storage room
- Emails, spreadsheets and other documents on laptop
- Cloud storage (Office 365)

WHY	WHO	WHAT			WHEN				WHERE	
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to	
STAFF ADMIN	Current and former staff members	<b>Personal details</b>								
		Name	Individual		Appointment	As required	Staff records retained for 6 years after termination unless ongoing litigation	Employment / limitation law	HMRC Pension provider Bank	
		Address / Telephone numbers	Individual	Contact / Legal obligation	Appointment	As required				
		Email address(es)	Individual		Appointment	As required				
		Date of birth	Individual		Appointment	As required				
		<b>Financial details</b>								
		Bank account number and sort code	Individual	Contact / Legal obligation	Appointment	As required	Staff records retained for 6 years after termination unless ongoing litigation	Employment / limitation law	HMRC Pension provider Bank	
		<b>Payroll and salary details</b>								
		NI number Tax codes Salary	Individual	Contact / Legal obligation	Appointment	As required	Staff records retained for 6 years after termination unless ongoing litigation	Employment / limitation law	HMRC Pension provider	
		Tax and NI payments	Individual		Appointment	As required				
		Pension information	Individual		Appointment	As required				
		<b>Employment details</b>								
		Contract of employment	Individual / third party	Contract	Appointment	As required	Staff records retained for 6 years after termination unless ongoing litigation	Employment / limitation law	Potential future employers (references) Tribunals	
		Training records/CPD	Individual / third party	Public task	At the time	As required				
Annual leave history	Individual / third party	Contract	At the time	As required						
Records of disciplinary or grievance processes	Individual / third party	Contract	At the time	As required						
Records of sickness absence and	Individual / third party	Contract	At the time	As required						

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
		reasons (health information)							
		Accident records	Individual / third party	Public task / Legal obligation	At the time	As required	3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21).	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)(SI 1995/3163) as amended, and Limitation Act 1980	Health & Safety Executive Courts
		Criminal convictions/offences	Individual / third party	Contract	Pre-appointment	As required	Staff records retained for 6 years after termination unless ongoing litigation	Employment / limitation law	
		<b>Job application details</b>							
		Employment status	Individual / third party	Contract	Pre-appointment	Never			
		Previous employment history and salaries	Individual / third party	Contract	Pre-appointment	Never			
		Education and training	Individual / third party	Contract	Pre-appointment	Never	Staff records retained for 6 years after termination unless ongoing litigation	Employment / limitation law	
		References, sickness absence	Individual / third party	Contract	Pre-appointment	Never			
		Criminal convictions/offences	Individual / third party	Contract	Pre-appointment	Never			
Records of interviews and/or assessments / interview panel records	Individual / third party	Contract	Pre-appointment	Never					
				Pre-appointment					

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
	Emergency contact	Name Address / Telephone numbers	Third party	Vital interests	Appointment	As required / reviewed at least annually	Until staff leaves	No business requirement	
	Previous applicants and potential applicants	<b>Personal details</b> Name Address / Telephone numbers Email address(es) Date of birth	Individual Individual Individual Individual	Public task Public task Public task Public task	Application / enquiry Application / enquiry Application / enquiry Application / enquiry	As required As required As required As required	Records of unsuccessful applicants and enquiries about a vacancy will be kept for 1 year	Good practice - based on time limits in various discrimination acts	
		<b>Job application details</b> Employment status Previous employment history and salaries Education and training References, sickness absence Criminal convictions/offences Records of interviews and/or assessments / interview panel records	Individual / third party Individual / third party Individual / third party Individual / third party Individual / third party Individual / third party	Public task Public task Public task Public task Public task Public task	Pre-appointment Pre-appointment Pre-appointment Pre-appointment Pre-appointment Pre-appointment	Never Never Never Never Never Never	Records of unsuccessful applicants and enquiries about a vacancy will be kept for 1 year	Good practice - based on time limits in various discrimination acts	

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
COUNCIL / CLLR ADMIN	Current town councillors & their spouses	<b>Personal details -</b> Name	Individual / third party						Published publicly
		Address / telephone numbers	Individual / third party	Public task / legal obligation	On appointment / election	As required	Until end of term of office	Best practice	
		Email address(es)	Individual / third party						
		Date of birth,	Individual / third party						Banks
		<b>Financial details -</b> Bank account number and sort code	Individual	Public task	As required - e.g. for bank mandates	As required	Until there is no longer an administrative requirement	Best practice	Banks
		<b>Register of interests</b> Information on property owned, business interests, membership of trade unions and outside bodies	Individual	Legal obligation (Localism Act 2011)	On appointment / election	As required	6 years	Limitation law	Published on the website Monitoring Officer
		<b>Photographs</b>	Individual / third party	Consent	Various	As required	Until there is no longer an administrative requirement	Best practice	Published on website Newsletters Press releases
		<b>Attendance, voting records and contributions to meetings</b>	Third party (Clerk)	Legal obligation (LGA 1972 Sch12 Para 40)	Various	N/A	Permanently (when recorded in council minutes).  Otherwise - until there is no longer an administrative requirement.	Legal obligation  Best practice	Council minutes published on the website  Legal requirement to have a hard copy minute book that the public can inspect (LGA 1972)
		<b>Expenses claims</b>	Individual / third party	Public task	Various	N/A	6 years	Limitation law	
<b>Records of complaints and or standards issues</b>	Individual / third party	Public task	Various	N/A	6 years	Limitation law	Monitoring Officer		
<b>Councillor correspondence,</b>	Individual / third party	Public task	Various	N/A	Until there is no longer an administrative requirement	Best practice			

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
		including resignation letters							
	Family and friends of councillors	<b>Personal details -</b> Name	Individual / third party	Consent	Various	As required	Until there is no longer an administrative requirement	Best practice	
		Address / telephone numbers	Individual / third party	Consent					
	Email address(es)	Individual / third party	Consent						
		<b>Photographs</b>	Individual / third party	Consent	Various	As required	Until there is no longer an administrative requirement	Best practice	Newsletters / website updates
	Councillor candidates & potential cooptees	<b>Personal details -</b> Name	Individual	Public task / legal obligation	On enquiry, expression of interest, registration as candidate	As required	Until there is no longer an administrative requirement	Best practice	Monitoring Officer Courts
		Address / telephone numbers	Individual						
		Email address(es)	Individual						
		Date of birth	Individual						
		<b>Personal / social / work history</b>	Individual	Public task / legal obligation	On enquiry, expression of interest, registration as candidate	As required	Until there is no longer an administrative requirement	Best practice	Monitoring Officer Courts
		<b>Legal declaration of qualification to hold public office as a local councillor</b>							
		Age Bankruptcy information Criminal convictions Disqualifications	Individual	Public task / legal obligation	On enquiry, expression of interest, registration as candidate	As required	Until there is no longer an administrative requirement	Best practice	Monitoring Officer Courts

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
	Members of the public and representatives of organisations attending council meetings or who have requested an item for a council agenda	<b>Personal details -</b> Name Address / telephone numbers Email address(es)	Individual Individual Individual	Public task Public task Public task	On enquiry	As required	Permanently (if recorded in Council minutes)  Otherwise - until there is no longer an administrative requirement	Legal requirement  Best practice	Minutes are published on the website
	Residents attending civic services or events (including: Civic Sunday, Over 70s gift giving etc.)	<b>Personal details -</b> Name Address Email addresses(es)	Individual Individual Individual	Public task Public task Public task	At event	N/A	Until there is no longer an administrative requirement	Best practice	
		<b>Personal / social / work history</b>  e.g. life experience, community activities	Individual / third party	Consent	At event / on nomination	N/A	Until there is no longer an administrative requirement	Best practice	Website Newsletter Press releases
		<b>Photographs</b>	Individual / third party	Consent	At event / on nomination	N/A	Until there is no longer an administrative requirement	Best practice	Website Newsletter Press releases
	Householders and agents listed on planning applications	<b>Personal details -</b> Name Address	Third party (Kirklees Council)	Public task The Town and Country Planning (Development Management Procedure) (England) Order 2015, allows for personal data	In preparing agenda	N/A	Permanently (if recorded in Council minutes)  Otherwise - until there is no longer an administrative requirement	Legal requirement  Best practice	Kirklees Council National Park Authority Minutes published on website

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
				(e.g. addresses) to be published.					
PROVISION OF SERVICES	Residents receiving or on a waiting list for services	Personal details - name, address, telephone numbers, email address(es)	Individual	Public task / contract	On enquiry	As required	Until there is no longer an administrative requirement	Best practice	
		Financial details - bank account number and sort code	Individual	Public task / contract	On payment (if by cheque)	N/A	Retained only for the time taken to process payment	No business need to retain for longer	
GRANT APPLICATION	Representatives of organisations applying for a grant from the town council	Personal details - name, address, telephone numbers, email address(es)	Individual	Public task / contract  Consent (re: press releases and additional publicity)	On application	As required	Permanently if recorded in Council minutes  Otherwise, until there is no longer an administrative requirement	Best practice	Council minutes are published on the website.
GENERAL ENQUIRIES	Residents	Personal details - name, address, telephone numbers, email address(es)	Individual / Third party (Cllrs)	Public task	On enquiry	As required	Until there is no longer an administrative requirement	Best practice	Any disclosure would be subject to explicit consent
		Correspondence - letters, complaints, compliments	Individual / Third party (Cllrs)	Public task	On enquiry	As required	Until there is no longer an administrative requirement	Best practice	
		Lifestyle, social circumstances, education and employment details Potentially including sensitive personal data	Individual / Third party (Cllrs)	Public task	On enquiry	As required	Until there is no longer an administrative requirement	Best practice	
		Financial details	Individual / Third party (Cllrs)	Public task	On enquiry	As required	Until there is no longer an administrative requirement	Best practice	

WHY	WHO	WHAT			WHEN				WHERE
		Type	Source	Legal basis	Originally	Updated	Retention period	Determined by	Who the personal data is potentially disclosed to
<b>MONITORING / CRIME PREVENTION</b>	Individuals	<b>CCTV Footage</b>	Third party contractor	Public task (Local Government and Rating Act 1997 S31)	When captured	Never	<b>CURRENTLY NOT APPLICABLE AS THE COUNCIL DOESN'T HAVE A CCTV PROVISION AT PRESENT</b>	CCTV code of practice and Surveillance Code of Practice	Police
<b>CONTRACTORS</b>	Contractors	<b>Personal details</b> - name, address, telephone numbers, email address(es)	Individual	Contract	Via tender processes On entering into contract or agreement	As required	2 years (unsuccessful tenders) 12 years (contracts/agreements)	Limitation law	Residents Council minutes Website
		<b>Financial details</b> - bank account number and sort code	Individual	Contract					