Dalton Town Council – Data Audit Policy & Annual Audit Plan

Linked Policy: Data Protection Policy
Approval Date: ………………………………..
Review Date: …………………………………
Responsible Officer: Town Clerk / Data Protection Officer

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1. Purpose

The purpose of this Data Audit Policy is to ensure Dalton Town Council regularly reviews and monitors its handling of personal data in line with the UK GDPR, Data Protection Act 2018, and the Council's Data Protection Policy.

The audit aims to:

- Identify and mitigate data protection risks.
- Ensure compliance with the Retention of Documents Policy.
- Verify that data handling practices are consistently applied across the Council.
- Support accountability and transparency to residents, staff, and councillors.

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2. Scope

This policy applies to all personal and sensitive data processed by Dalton Town Council, including:

- Digital records (Council software, emails, shared drives)
- Physical/paper records (meeting minutes, correspondence, forms)
- Data shared with third parties (contractors, service providers)
- Data collected from residents, staff, volunteers, and councillors

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3. Roles & Responsibilities

- **Town Clerk / Data Protection Officer (DPO):**
  Responsible for planning, executing, and reporting audits, maintaining the data register, and ensuring compliance with this policy.
- **Staff / Councillors:**
  Support the audit process by providing access to records, following retention schedules, and implementing audit recommendations.

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4. Audit Types & Frequency

Audit Type	Description	Frequency	Responsible Officer
Full Data Audit	Comprehensive review of all personal data, including data mapping, retention compliance, and security controls	Annually	Town Clerk / DPO
Targeted Audit	Focused review on high-risk areas or new systems	Quarterly / As needed	Town Clerk / DPO
Retention Compliance Check	Verify data is retained and disposed of according to Retention of Documents Policy	Annually	Town Clerk / DPO

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5. Audit Activities

Each audit should include:

1. **Data Mapping:** Confirm all personal data is recorded in the Data Register, with purposes, legal basis, retention periods, and owners.
2. **Security Review:** Check access controls, encryption, physical security, and identify vulnerabilities.
3. **Retention & Disposal:** Ensure compliance with retention schedules; confirm secure deletion of outdated data.
4. **Data Sharing / Third Parties:** Review agreements, contracts, and DPIAs where applicable.
5. **Training & Awareness Check:** Ensure all staff and councillors are aware of data handling responsibilities.
6. **Record Findings:** Document all audit results, risks, and actions required.

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6. Reporting & Actions

- Audit reports will include findings, risk assessments, and recommended actions.
- Reports will be submitted to the Council or relevant Committee for review.

- Actions will be assigned with deadlines and monitored for completion.
- Audit results feed into the Risk Register and governance reports.

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7. Annual Data Audit Plan

Month	Audit Activity	Description	Responsible Officer	Deliverables
January	Audit Planning	Review prior audit, update checklist, confirm annual schedule	Town Clerk / DPO	Audit plan & key dates
February	Data Mapping	Verify Data Register is accurate	Town Clerk / DPO	Updated data register
March	Security & Access Review	Review digital/physical security controls	Town Clerk / DPO	Security review report
April	Retention & Disposal Review	Audit retention compliance, ensure secure deletion	Town Clerk / DPO	Retention audit report
May	Targeted Audit	Review new systems/processes	Town Clerk / DPO	Recommendations for new processes
June	Data Sharing / Third Parties	Review third-party data sharing agreements & DPIAs	Town Clerk / DPO	Updated data sharing register
July	Training & Awareness	Verify staff/councillor training & compliance	Town Clerk / DPO	Training report & schedule refresher
August	Mid-Year Risk Review	Update Risk Register with audit findings	Town Clerk / DPO	Mid-year risk summary
September	Targeted High-Risk Audit	Review sensitive data areas (financial, HR, resident complaints)	Town Clerk / DPO	Findings & actions
October	Data Breach Preparedness	Review Data Breach Policy & incident readiness	Town Clerk / DPO	Preparedness report

Month	Audit Activity	Description	Responsible Officer	Deliverables
November	Pre-Year-End Full Audit	Comprehensive review of all data & retention compliance	Town Clerk / DPO	Pre-year-end audit report
December	Reporting & Action Plan	Produce formal report, submit to Council, set next year’s audit plan	Town Clerk / DPO	Final report & next year schedule

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8. Review & Update

- This Data Audit Policy & Annual Plan will be **reviewed annually** or after significant changes to data processing, systems, or legislation.
- Updates must be approved by the Council and communicated to staff and councillors.