

Little Harrowden Parish Council - Data Map / Record of Processing Activities (ROPA)

Adopted by Little Harrowden Parish Council on 9th September 2026

Review: September 2029, or earlier if processing activities, systems, suppliers, legislation, guidance or Council policies materially change.

Signed Dated

Council contact details	Data protection contact details
Clerk: Sylvia Tilaks Mulberry Cottage, 15 Main Road, Grendon, NN7 1JW 07942 292479 clerk@littlearrowdenparishcouncil.gov.uk https://littlearrowdenparishcouncil.gov.uk/	Data Controller: Little Harrowden Parish Council Operational Data Protection Officer: Clerk, Sylvia Tilaks Appointed external DPO service: Northamptonshire County Association of Local Councils (NCALC) Role: independent DPO support and direct reporting/escalation where required ICO: https://ico.org.uk/

Governance and policy framework

This data map supports the Council's accountability and records-of-processing obligations and must be read with the Little Harrowden Parish Council Data Protection Policy, Privacy Policy, Data Breach Policy, Records Retention Policy, GDPR Security Compliance Checklist, Complaints and Compliments Policy, Abusive, Persistent or Vexatious Demands and Complaints Policy, Subject Access Request Procedure, Publication Scheme, IT/Email arrangements and relevant Health and Safety records. It reflects the UK GDPR and Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, together with the Freedom of Information Act 2000, Environmental Information Regulations 2004, Privacy and Electronic Communications Regulations 2003, Local Government Act 1972, Local Audit and Accountability Act 2014, Accounts and Audit Regulations 2015, Transparency Code for Smaller Authorities 2015 and other legislation applying to the specific processing activity. The map is a living record and must be reviewed when processing, systems, suppliers, policies or legislation materially change.

Data protection responsibilities: The Clerk acts as the Council's operational Data Protection Officer and manages day-to-day UK GDPR/data protection compliance, rights requests and personal data breach matters on behalf of the Council. NCALC is the Council's formally appointed external DPO service, providing independent support and advice and a route for direct reporting or escalation where appropriate. The Council remains the Data Controller and retains overall accountability for compliance.

Data map

COLUMN A Information type	COLUMN B What personal information is collected?	COLUMN C Category of individual	COLUMN D Where does the data go?	COLUMN E Where/how is data stored?	COLUMN F Security measures	COLUMN G Why do you need the data? / Processing purpose	COLUMN H Lawful basis for processing	COLUMN I How long is the data retained?	COLUMN J Data shared with third parties?
Incoming email / website enquiry	Name, email address, and any information provided; may include address/phone or special category data depending on enquiry	Residents, councillors, employees, contractors, volunteers, organisations	Clerk; relevant councillor or full Council where necessary	Council email, secure cloud/hard drive; hard copy only where necessary	Password/access controls; MFA (multi factor authentication) where available; restricted access; secure storage	Respond to enquiries and conduct Council business	Art 6(1)(e) public task and/or 6(1)(c) legal obligation; 6(1)(b) contract where relevant	Delete when resolved and no longer required; substantive correspondence follows relevant Records Retention Policy category	Relevant public authority, contractor, adviser or councillor only where necessary/lawful

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Telephone calls / messages	Name, telephone number and information supplied	Residents, councillors, employees, contractors, volunteers	Clerk/intended recipient	Temporary note, phone/device, or follow-up email	Device access controls; notes securely destroyed after action	Respond to enquiries / operational administration	Art 6(1)(e)/(c); 6(1)(b) where contractual	Until actioned unless incorporated into substantive record	Normally no; relevant recipient where necessary
Resident correspondence / letters	Name, address, contact details and content of correspondence	Residents / members of public	Clerk; Council/councillors where required	Secure cloud/hard drive/email; locked filing where hard copy retained	Restricted access; password protection; locked storage	Council administration, casework, statutory functions and decision-making	Art 6(1)(e) public task and/or 6(1)(c) legal obligation	Delete when matter resolved and no longer required; substantive records follow relevant category	NNC, police, contractors, advisers or other bodies where necessary and lawful
Council meeting papers / public participation	Names, correspondence and information relevant to Council business; special category data avoided unless necessary	Residents, councillors, employees, third parties	Clerk, Council; public only where publication is lawful	Council systems; agenda/minute files; website where published	Redaction/data minimisation before publication; secure source records	Open government, lawful decision-making, meeting administration	Art 6(1)(c) legal obligation and 6(1)(e) public task	Agenda supporting records per Records Retention Policy; minutes permanent	Public via website where required; councillors; external bodies as necessary
Minutes and formal resolutions	Names/roles and information necessary to record Council decisions	Councillors, officers, residents/ other attendees where relevant	Council and public	Council archive, cloud/hard drive, website; permanent archive	Published version checked/redacted as required; secure archive	Statutory record of proceedings and transparency	Art 6(1)(c) legal obligation / 6(1)(e) public task	Permanent / indefinite	Public; archives/records office where applicable
Acceptance of office / councillor administrative records	Name, signature, address/contact information where required	Councillors	Clerk; monitoring/electoral authority where applicable	Secure hard copy and/or Council cloud/hard drive	Restricted access; locked storage/password controls	Statutory councillor administration	Art 6(1)(c) legal obligation	Term of office and thereafter only as required by law/Records Retention Policy	NNC Monitoring Officer/Electoral Services where required
Register of interests / declarations	Name, interests and addresses/details required by law	Councillors	Clerk, NNC Monitoring Officer, public website as required	Council files; NNC systems; website	Publication limited to statutory requirements; sensitive address protections where applicable	Standards and statutory transparency	Art 6(1)(c) legal obligation; Localism Act 2011	For term of office and statutory publication/retention period	NNC Monitoring Officer; public

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Electronic service of summons/agendas	Name, official/personal email and consent/notification records where required	Councillors	Clerk	Council email/cloud/hard drive	Password controls; restricted access	Meeting administration and lawful service of documents	Art 6(1)(c) legal obligation / 6(1)(e) public task	Term of office plus any period required to evidence service	No, except IT/email provider
Councillor contact/security compliance records	Contact details; signed GDPR Security Compliance Checklist	Councillors	Clerk	Secure Council cloud/hard drive; locked filing if paper	Restricted access; password/locked storage	Accountability, information security and governance	Art 6(1)(e) public task / 6(1)(c) legal obligation	Duration of membership, then per Records Retention Policy	Normally no; external adviser/auditor if necessary
Planning consultation records	Applicant/agent names, site/address and representations/correspondence	Applicants, agents, residents	Clerk, Council, NNC Planning; public record where lawful	Council email/cloud/hard drive; meeting records; website where published	Redaction/data minimisation; restricted source records	Statutory consultee role and local planning representations	Art 6(1)(e) public task / 6(1)(c) legal obligation	Formal Council representations retained as corporate record; supporting personal correspondence per Records Retention Policy	NNC Planning; public where part of statutory record
Neighbourhood Plan/community consultations	Names/contact details where supplied; survey responses; organisation/business details; demographic data only where necessary	Residents, businesses, community organisations	Clerk, Council/working group; planning consultant/NNC where relevant	Council survey/email/cloud systems; hard copy where used	Data minimisation; access controls; anonymise aggregate results wherever possible	Plan-making, consultation and evidence gathering	Art 6(1)(e) public task; 6(1)(c) where statutory; consent only for optional communications	Identifiable raw responses only as long as necessary; anonymised evidence may be retained longer/permanently	Consultants/NNC where necessary; anonymised publication
Event photographs / publicity	Images; names/captions where used	Residents, volunteers, councillors, visitors, children where appropriate	Website/social media/newsletter/archive	Council devices/cloud/website/social media	Consent/notice where appropriate; extra care for children; restricted originals	Community engagement, record of Council activities and publicity	Art 6(1)(e) public task where appropriate; consent Art 6(1)(a) where relied upon	For stated purpose; review periodically; archive only where justified	Website/social media providers; public
Newsletter / mailing list	Name, email address and/or postal address	Residents and subscribers	Clerk / mailing platform if used	Council email/cloud or mailing platform	Access controls; unsubscribe/withdrawal process	Send requested Council news/updates	Consent Art 6(1)(a), or public task where communication is necessary and proportionate	Until unsubscribe/consent withdrawn or list no longer used	Email/mailing service provider where used

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Website visitors / cookies / analytics	IP address, browser/device data, cookie identifiers and usage data where collected	Website visitors	Website platform/analytics service; Council receives analytics where enabled	Parish Online / website service infrastructure	Platform security; consent controls for non-essential analytics	Operate, secure and improve Council website	Strictly necessary processing: Art 6 basis as applicable; non-essential cookies/analytics: PECR consent and UK GDPR consent where applicable	According to Privacy Policy/platform cookie retention settings	Parish Online/Local Authority Technology CIC and relevant service providers
Contractor/supplier records	Name, business contact details, address, bank/payment details, insurance/qualification information	Contractors, suppliers, sole traders, company contacts	Clerk, Council, bank, insurer/advisers where required	Council email/cloud/hard drive; locked files where paper	Restricted access; secure payment controls	Procurement, contract management, insurance and asset maintenance	Art 6(1)(b) contract; 6(1)(c) legal obligation; 6(1)(e) public task	Contracts normally 6 years after end; deeds/sealed contracts 12 years; other records per Records Retention Policy	Bank, insurer, auditor, HMRC, advisers, relevant authority where required
Invoices / payments / receipts	Names, addresses, contact and bank/payment details where personal data is present	Suppliers, contractors, grant recipients, employee	Clerk/RFO, authorised councillors, bank, auditor, HMRC	Accounting system, bank, secure cloud/hard drive; locked files where paper	Restricted access; banking controls; password/MFA where available	Financial administration, audit, tax/VAT and public accountability	Art 6(1)(c) legal obligation; 6(1)(e) public task; 6(1)(b) contract	6 years	Bank, auditor, HMRC, payroll/accounting provider as applicable
Bank mandate / signatory records	Name, signature, contact details and bank-required identity data	Councillors / Clerk	Bank; Clerk/RFO	Bank systems; secure Council records	Restricted access; bank security/MFA	Operate Council bank account and authorise payments	Art 6(1)(b) contract / 6(1)(e) public task	Until signatory changed, then only as long as required for audit/legal purposes	Bank
Grant applications made by the Council	Named contacts, signatures, contact details, project information	Clerk, councillors, community contacts	Grant provider; Council	Council cloud/email/hard drive; provider system	Access controls; data minimisation	Obtain external funding for Council projects	Art 6(1)(e) public task; 6(1)(b) where grant terms form contract	Per Records Retention Policy / grant conditions, normally 6 years after completion where financially material	Grant provider, funder/auditor

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Grant applications received by the Council	Applicant/contact names, addresses, email/phone, bank/payment details and supporting information	Residents, community groups, organisations	Clerk/RFO, Council	Secure Council cloud/email/hard drive; locked paper files	Restricted access; redact published papers	Assess and administer grants	Art 6(1)(e) public task; 6(1)(c) where applicable	Normally 6 years where payment made; unsuccessful applications only as long as necessary/per Records Retention Policy	Council/auditor/bank; public only to extent lawful
Clerk employment contract / personnel file	Name, address, contact details, employment terms, emergency contact and relevant HR records	Employee	Clerk; Chair/authorised councillors; payroll/HR adviser as necessary	Secure cloud/hard drive and locked paper records	Strictly restricted access; password/locked storage	Employment administration and legal obligations	Art 6(1)(b) contract; 6(1)(c) legal obligation; Art 9 condition where special category data is necessary	Essential records up to 6 years after employment ends; review/delete unnecessary material sooner	Payroll provider, HMRC, pension provider, HR/legal adviser as necessary
Payroll / PAYE / pension	Name, address, NI number, date of birth, salary, tax, bank and pension information	Employee	Payroll provider, HMRC, bank, pension provider; Clerk/RFO	Payroll/provider systems; Council secure records	Access controls; processor contract; encryption/MFA where available	Pay employee, tax, NI, pension and statutory reporting	Art 6(1)(b) contract / 6(1)(c) legal obligation; Art 9 where applicable	6 years after end of relevant tax year	Payroll provider, HMRC, bank, pension provider
Appraisals / training / leave records	Name, performance/training information, leave and related employment data	Employee	Clerk; Chair/authorised councillors; training provider where booked	Secure Council systems; provider systems for training	Restricted access; data minimisation	Employment management, training and statutory duties	Art 6(1)(b)/(c); Art 9 where health data is processed	Review during employment; essential records retained per Records Retention Policy, up to 6 years after employment ends where justified	Training provider; HR/legal adviser where necessary
Complaints and compliments	Name/contact details, complaint/compliment content, evidence, correspondence; may include special category data	Complainants, residents, councillors, staff, third parties	Clerk; Complaints Committee/ Council where required; Chair for Clerk complaints	Secure Council email/cloud/hard drive; locked files where paper	Need-to-know access; confidentiality; redaction; secure storage	Investigate and respond to complaints; record compliments/service improvement	Art 6(1)(e) public task / 6(1)(c) legal obligation; Art 9 condition where special category data is necessary	Substantive complaints normally 6 years after closure; compliments delete/anonymise when no longer needed, per Records Retention Policy	ICO for data protection complaints; NNC Monitoring Officer for councillor conduct; legal/insurance advisers where necessary

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Abusive, persistent or vexatious case records	Name/contact details, correspondence history, behaviour records, restrictions and decisions	Complainants / correspondents	Clerk; Chair/Vice-Chair/Council as provided by policy; legal adviser/police where necessary	Restricted Council systems; locked paper files	Strict need-to-know access; confidentiality; documented review	Protect staff/councillors, manage Council resources and proportionate communications	Art 6(1)(e) public task / 6(1)(c) legal obligation; legal claims condition where relevant	Duration of restriction plus 3 years after closure, subject to review/legal hold	Police/legal adviser/insurer only where necessary; statutory request bodies as applicable
Freedom of Information / EIR requests	Requester name/contact details, request, correspondence, information located and response	Requesters and third parties named in records	Clerk; Council/adviser where necessary	Council email/cloud/hard drive; disclosure log where maintained	Restricted case file; redaction before disclosure	Comply with FOIA 2000 / EIR 2004 and manage repeated/vexatious/manifently unreasonable requests lawfully	Art 6(1)(c) legal obligation / 6(1)(e) public task	Normally 3 years after closure unless underlying record has longer retention	ICO where complaint/appeal; public body/third party consultation where necessary
Subject Access / other data protection rights requests	Name/contact details, identity evidence where necessary, request, search results, correspondence and decision	Data subjects and third parties named in records	Clerk as operational Data Protection Officer; NCALC as the Council's appointed external DPO service where support, advice or direct reporting/escalation is required	Restricted Council email/cloud/hard drive; secure transfer for response	Strict access controls; secure identity checks and disclosure	Comply with UK GDPR/DPA 2018 rights requests	Art 6(1)(c) legal obligation	Normally 3 years after closure, subject to legal hold	ICO and/or NCALC DPO service where necessary
Personal data breach records	Names/contact details where relevant, facts of breach, affected data/people, risk assessment, notifications, remedial actions	Affected individuals, staff/councillors, third parties	Clerk; Chair/Vice-Chair/Council where policy requires; NCALC DPO service for support/direct reporting as appropriate; ICO where notification is required	Restricted breach log and supporting records	Strict need-to-know access; secure storage; incident containment	Meet UK GDPR breach accountability/notification duties and prevent recurrence	Art 6(1)(c) legal obligation / 6(1)(e) public task	6 years after closure, subject to legal hold/Records Retention Policy	ICO, affected individuals, NCALC DPO service, processor/adviser/insurer where necessary

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Accident / incident / near-miss records	Name, contact details, incident facts, injury/health information, witness details	Employees, councillors, volunteers, contractors, public	Clerk; Council where appropriate; insurer/HSE if reportable	Restricted Council records; accident record system/hard copy	Confidential health data; restricted access; secure storage	Health and safety, investigation, insurance and statutory reporting	Art 6(1)(c) legal obligation / 6(1)(e); Art 9 employment/social protection or legal claims as applicable	Minimum 3 years; longer where claim/legal hold/insurance requirement applies	Insurer, HSE/RIDDOR, emergency services/legal adviser where necessary
Volunteer/event sign-in and risk assessment acknowledgements	Name, signature/attendance, contact details where needed, emergency information if collected, confirmation risk assessment/conditions read	Volunteers / event helpers	Clerk/event organiser; insurer/emergency services if incident occurs	Event-specific sign-in sheet; secure Council records after event	Only necessary data collected; secure storage; access limited to organiser/Clerk	Volunteer coordination, attendance, health and safety and evidence of briefing	Art 6(1)(e) public task / 6(1)(c) H&S legal obligation; vital interests only in emergency	Normally 3 years after event; longer if incident/claim/legal hold	Insurer/emergency services where necessary
Community Speedwatch volunteer records	Name/contact details, training/registration and attendance details	Volunteers / councillors	Council coordinator; Northamptonshire Police/PFCC scheme as required	Council secure records and police/scheme systems	Access controls; scheme rules; minimum necessary local copies	Administer Community Speedwatch safely and in accordance with police scheme	Art 6(1)(e) public task; 6(1)(c) where applicable	For duration of participation plus period required by scheme/Records Retention Policy	Northamptonshire Police/PFCC and training provider
Community Speedwatch vehicle observations	Vehicle registration, speed/time/location and other details required by police scheme; no keeper data unless supplied by police	Drivers/registered keepers indirectly	Northamptonshire Police/PFCC via scheme; Council coordinator only to extent required	Scheme forms/system; avoid unnecessary local retention	Scheme access controls; prompt transfer; restricted local access	Road safety evidence under police-managed scheme	Public task basis as defined by scheme/police; Council processes only under scheme instructions	Retain locally only for period required by police scheme; then securely delete	Northamptonshire Police/PFCC
Asset/play area/MUGA/Lower Meadow inspection and defect reports	Inspector/contractor/resident name and contact details where included; photographs may incidentally identify people	Councillors, contractors, residents, members of public	Clerk, Council, contractor/insurer where necessary	Council cloud/hard drive/email; inspection reports	Secure storage; minimise incidental personal data	Maintain Council land/assets and demonstrate inspection/maintenance history	Art 6(1)(e) public task / 6(1)(c) legal obligation where H&S applies	Normally 6 years; longer where incident/claim/legal hold; permanent asset records as appropriate	RoSPA/inspection contractor, insurer, maintenance contractor, legal adviser as necessary

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Village Hall custodian trustee records	Names/contact details of trustees/committee members, correspondence and legal/title documentation	Councillors, Village Hall trustees/committee, professional advisers	Clerk/Council; Village Hall Trust; solicitor/HM Land Registry where required	Council secure records; legal files	Restricted access to non-public information	Discharge custodian trustee/land ownership responsibilities	Art 6(1)(e) public task / 6(1)(c) legal obligation; contract where professional services used	Legal/title/trust records permanent or as required; routine correspondence per Records Retention Policy	Village Hall Trust, solicitor, HM Land Registry, Charity Commission where applicable
Insurance claims / legal matters	Names/contact details, incident/evidence, financial and health information where relevant	Residents, employees, councillors, volunteers, contractors	Clerk, Council, insurer, solicitor/claims handler	Restricted Council and insurer/legal systems	Strict need-to-know access; secure transfer	Defend/bring legal claims and manage insurance	Art 6(1)(c)/(e); Art 9 legal claims condition where special category data	6 years after closure or longer where insurer/legal hold requires	Insurer, solicitor, court/tribunal, relevant authority
Records of consent	Name/contact details, consent wording, date/method and withdrawal record	Residents, subscribers, volunteers, individuals appearing in publicity	Clerk	Council systems; evidence linked to relevant activity	Restricted access; record version/date	Demonstrate valid consent where consent is lawful basis	Art 6(1)(a) consent	For duration of processing relying on consent and thereafter only as long as necessary to demonstrate compliance	Service provider where consent relates to that service
Emergency plan contacts	Name, role, telephone/email and relevant availability information	Councillors, volunteers, residents, organisations	Clerk, Council/emergency planning leads; emergency services where needed	Council secure emergency plan/contact list	Restricted circulation; version control; remove outdated contacts	Community resilience and emergency response	Art 6(1)(e) public task; 6(1)(d) vital interests in an actual emergency where applicable	While current/required ; review regularly and delete superseded personal contacts	Emergency services/NNC/partner organisations where necessary

Notes and exclusions

1. VAS units: speed/time/count data is not treated as personal data where the unit does not capture registration numbers, images or other identifiers. If configuration changes to capture identifying information, the data map and Privacy Policy must be reviewed before processing starts.
2. Council assets such as streetlights, planters, seats, the MUGA, play equipment, playing field and Lower Meadow are not themselves personal data. Personal data arises only where inspection, maintenance, complaint, incident, contractor or volunteer records identify individuals.
3. Little Harrowden Parish Council has no allotments; all allotment-related rows in the Grendon map have therefore been removed.
4. The Council is custodian trustee of the Village Hall; day-to-day Village Hall management is undertaken by the Village Hall Trust. The Council maps only the personal data it processes in its own custodian-trustee/corporate capacity.

5. Where a processor handles personal data on the Council's behalf, an appropriate written data-processing contract or equivalent contractual terms must be in place. International transfers, if any, must be documented together with the applicable safeguard.
6. If a record falls within more than one category, the longest applicable lawful retention period applies. Records subject to an active complaint, investigation, audit, insurance claim, statutory request or legal proceedings must not be destroyed until the hold is released.