

STAVERTON PARISH COUNCIL

Assertion 10 – Digital and Data Governance Compliance 2025 to 2026

Assertion 10 of the Annual Governance and Accountability Return (AGAR) is a new requirement for English local councils, effective from the 2025/26 financial year, that formalizes digital and data compliance. It requires councils to have an IT policy, use a council-owned domain for official email, ensure their website meets WCAG 2.2 AA accessibility standards, and comply with data protection legislation like the UK GDPR. This replaces previous, implied requirements under Assertion 3 to give digital governance and data protection requirements their own standalone section

1. Email and Communication Systems

- All official correspondence uses a Council domain email address (e.g.org.uk).
- Email systems are monitored, backed up, and secured with appropriate IT controls.
- Email policies exist and are regularly reviewed.
- Councillors' official communications follow GDPR principles and Council communication policy.

Staverton Parish Council adopted Council domain email addresses several years ago and employs Simply IT to regularly monitor and host these addresses. Every new councillor, clerk or editor of newsletter to be issued with the (.org.uk) email address. Data protection officer and clerk to attend training sessions as appropriate. Data protection officer to remind and update Councillors regarding GDPR issues and communications policy at the end of each parish council meeting as necessary.

Compliance:

Date	Subject	Attendees
2018	.org.uk email addresses adopted	Councillors & Clerk
2025	.org.uk email address adopted	Councillor Jon Miller
11.5.26 AGM	.org.uk email address to be issued to new editor – and cancel email address for existing Newsletter Editor who has now resigned.	

2. Website Accessibility and Information

- The Council's website complies with Web Content Accessibility Guidelines (WCAG) 2.2 AA standards.
- An up-to-date Accessibility Statement is published on the website.
- Website content is reviewed for accessibility compliance (alt text for images, correct document formats, appropriate colour contrast, etc.).
- Website content is kept up to date, including agendas, minutes, policies, and financial information as required by the Transparency Code.
- Publication of Council information aligns with the ICO Model Publication Scheme.

Staverton Parish Council employs Spotted Media to ensure that all security is up to date, and the accessibility guidelines are compliant. An up-to-date Accessibility Statement is published on the website. To be reviewed regularly.

Agendas, minutes, policies and financial information is published as required by the Transparency Code.

Publication aligns with the ICO Model Publication Scheme. This is adopted and published.

Compliance:

Date	Subject	Attendees
2024	Website: Spotted Media took over the hosting of the website and updated all security.	Parish Council members
2025	Accessibility statement reviewed	Councillors & clerk
11.5.26	AGM – Agreed to purchase a new website this financial year. Awaiting the start of a new Editor of the Newsletter.	All Cllrs and the Clerk

3. Data Protection Compliance (UK GDPR & DPA 2018)

- A Data Protection Policy is adopted and reviewed annually.
- A Data Protection Officer or designated responsible officer is appointed.
- A record of processing activities is maintained.
- Data Protection Impact Assessments (DPIAs) are conducted for relevant projects.
- Procedures exist for Subject Access Requests (SARs) and are compliant with statutory timelines.
- Secure storage and disposal protocols for personal data are in place.

A Data Protection Policy with all the compliant guidelines has been adopted and is reviewed annually by Data Protection Officer. Cllr Kevin Lamb has been appointed as the Data Protection Officer. A record of processing activities is maintained and reviewed annually. Data Protection Impact Assessments are conducted and one particular incident regarding email addresses for residents was discussed and training issued by the Data Protection Officer. Procedures exist for Subject Access Requests and is published on the website. – See Guidelines for ICO Model Publication Scheme.

Secure storage and disposal protocols are published on the website. – See Freedom of Information Policy.

***At the end of this document is a list of all Data Protection Guidelines, Policies and Risk Assessment reviewed by the Data Protection Officer and the Clerk. This list to be continuously reviewed and added to where necessary and fully accessible to the public.**

Compliance:

Date	Subject	Attendees
2018	NALC Training session	DATA Protection Officer & Clerk
2024	Training Session by DATA PO on email privacy issues following a near breach	All councillors and clerk
May 26	FOI Protocol and Data Protection guidelines	Reviewed by DPO
11.5.26 AGM	Training session at the end of the AGM by DPO on Resignations of Councillors and WhatsApp guidelines. Resignations of Clerk and Editor guidelines to follow.	All councillors and clerk
14.5.26 Complaint no. 002	Complaint – No breach as no person identified. All guidelines carried out, reports taken, DPO contacted ICO for self assessment.	All councillors and clerk notified. Originally contacted the editor of the newsletter.

	Email sent to the complainant 14.5.26 All within 72 hours as required.	

4. Freedom of Information (FOI) Compliance

- An FOI Policy is adopted and publicly available.
- The Council has adopted the ICO Model Publication Scheme.
- A clear procedure exists for handling FOI requests.
- The Council responds to FOI requests within statutory deadlines (20 working days for FOI, 40 working days for EIR where applicable).
- A Disclosure Log is maintained and accessible on the website.

An FOI Policy is adopted and published on the website.

The Council has adopted the ICO Model Publication Scheme which demonstrates a clear procedure for handling FOI requests within all statutory deadlines as stated.

A disclosure log is maintained and accessible/published at the end of the document.

Compliance:

Date	Subject	Attendees
Jul 2019	ICO Model Publication Scheme adopted and Freedom of Information Guidelines published	All parish councillors and clerk
May 2026	Reviewed by DPO under Assertion 10 new guidelines at meeting 11 th May 2026	All parish councillors and clerk

5. IT and Cybersecurity Governance

- IT policies and acceptable use guidelines are in place for councillors, staff, and volunteers.
- Antivirus, firewall, and software update protocols are in place and regularly reviewed.
- Backups of digital records are performed regularly and securely stored.
- Cybersecurity training is provided to all relevant parties.

IT policies and acceptable use guidelines are in place for councillors, staff and volunteers.

All new members are asked to sign guidelines to confirm they have read and understood them. Antivirus, firewall and software (Malwarebytes and Avast software in place) Simply IT in charge of software security and backups are performed regularly.

Cyber security training is offered to all relevant parties.

Compliance:

Date	Subject	Attendees
March 26	IT Policy adopted at parish council meeting 16 March 26	All parish councillors and parish clerk
2026	All annual software subscriptions for Malwarebytes and Avast renewed.	Parish council computer
11.5.26 AGM	Cyber security training to be laid on by the parish council	All parish councillors, the editor and the parish clerk

6. Record-Keeping and Audit Trail

- All key decisions, agendas, and minutes are published in line with Transparency Code requirements.
- A document retention policy is adopted and implemented.
- Records of FOI, SAR, and other information governance requests are maintained.
- An internal audit trail exists to confirm compliance with data protection and FOI obligations.

All key decisions, agendas and minutes are published in line with the Transparency Code requirements. A document retention policy is adopted, reviewed and published.

Records of FOI, SAR and other information governance requests are maintained.

An internal audit trail exists with evidence to comply with data protection and FOI obligations.

Compliance:

Date	Subject	Attendees
2026	Agendas, Minutes and key decisions published as per Transparency Code	All council members2026
2026	Document retention policy reviewed at May 11 th meeting of the parish council	All parish council members
11.5.26 AGM	DATA PO to add training to each parish council meeting and Clerk & DATA PO to attend an updated training session in 2026/27	DATA PO and clerk
13.5.26	Clerk removed all unnecessary reference to named persons in the online files.	Clerk

7. Training and Awareness

- All councillors and staff receive regular training on FOI, GDPR, and website accessibility obligations.
- Training records are maintained.

The Chair of the Parish Council, the Data Protection Officer and the Clerk attended a training course in 2018 as preparation for the GDPR and it covered all the necessary obligations. In 2025 the Data Protection Officer held a training session for all parish councillors and the clerk concerning email addresses from outside sources and sharing of information. The Data Protection Officer regularly points out issues to be aware of in most of our meetings.

Compliance:

Date	Subject	Attendees
2018	NALC DATA protection course	Data PO & Clerk
2025	Training session on data protection of emails	All council members
2026	Review of all data protection documents at meeting of 11 th May 2026	All council members

8. Annual Review

- A formal review of Assertion 10 compliance is conducted annually before approving the AGAR.
- Any issues identified are addressed and recorded.

An annual review will be held at the AGM to be held on 11th May 26 before approving the AGAR. All issues identified will be addressed and recorded.

Compliance:

Date	Subject	Attendees
11 May 26	Annual review and discussion of compliance with Assertion 10 with further training for councillors and the clerk	All council members and the clerk
11.5.26 AGM	All Assertion 10 documents to be published and reviewed annually or sooner if necessary And documented at a parish council meeting. DPO to work with the clerk to ensure compliance.	All council members and the clerk
14.5.26	Clerk updating Assertion 10 Compliance LOG And publishing on website	Clerk to publish on website

DATA PROTECTION GUIDELINES, POLICIES AND RISK ASSESSMENTS

Held and reviewed annually by Data Protection Officer & the Clerk

1. Privacy Statement and Protection of Personal Information.
2. Processor Guidelines
3. Councillor/Controller Guidelines
4. General Data Protection Regulations – Guidelines
5. When a Councillor Resigns – Guidelines and Declaration
6. WhatsApp – Data Protection Policy
7. Risk Assessment
8. GDPR General Data Protection Regulation
9. Model Publication Scheme – Guide to Information
10. SCRIBE software – Digital Data Processing Agreement and Compliance Record