

Meeting Type: Full Council	Agenda Item: 12
Date of Meeting: 8 th July 2026	
OAKHAM TOWN COUNCIL	
Report Author: Samantha Haywood, Locum Clerk/RFO	Purpose: Decision
Title: Assertion 10	
<p>1. Purpose of the Report</p> <p>To seek approval to adhere to Assertion 10 – Data Mapping Register, website accessible, GDPR training, I.T. and Data Management Policy.</p> <p>2. Background</p> <p>New Assertion10 was introduced last year - Digital and Data Compliance rules:</p> <ul style="list-style-type: none"> • Assertion 10 is a new statement covering digital, data and information governance for “smaller authorities” (i.e., parish & town councils) and is distinct from the previous broader Assertion 3 (which dealt with “compliance with laws, regulations and proper practices”). • It applies for the financial year commencing on or after 1 April 2025 (i.e. for AGAR returns for 2025/26 year onward) though councils were encouraged to prepare earlier. <p><u>Key Requirements under Assertion 10</u></p> <p>To answer “Yes” to Assertion 10 the Council must have taken actions in areas of digital/datum compliance. Key focus points are:</p> <p><u>Website legal & accessibility compliance.</u></p> <ul style="list-style-type: none"> • Any website of the council must meet the Web Content Accessibility Guidelines (WCAG) 2.2 AA standard. • The website must publish required documentation under the Freedom of Information Act 2000, the Transparency Code for Smaller Authorities, etc <p><u>Email & domain requirements</u></p> <ul style="list-style-type: none"> • The Council must use a generic email account on a domain owned/controlled by the council, e.g. clerk@abcparishcouncil.gov.uk or clerk@abctowncouncil.org.uk rather than a free service like Gmail or Outlook. • The domain should ideally be a “.gov.uk” or “.org.uk” which the authority controls. Free personal email services no longer meet the requirement. <p>Council meet this requirement as all officers and members have a .gov email address.</p> <p><u>I.T. policy / digital governance policy</u></p> <ul style="list-style-type: none"> • Council must have a formally adopted I.T. / digital policy: covering acceptable use of council-owned devices, email, data access, password management, storage/sharing of data, end-of-role procedures, etc. • The policy should cover all council business done electronically, including by councillors, officers, volunteers, and contractors. 	

Data protection / information governance

- The council must comply with the Data Protection Act 2018 and UK GDPR, as applicable, and be able to show that it processes personal data lawfully, fairly, and securely.
- The council needs to understand what personal data it holds, how it is used, who has access, how it is shared, how long it is kept, when it is disposed of, what security protections are in place, etc.

Ongoing compliance and evidence

- It's not sufficient simply to have a policy; the council must be able to evidence that the policy & practices are operating, e.g., training for councillors/staff, reviews of data processes, risk assessments, audits of digital systems.
- The changes should already be being implemented ahead of the AGAR submission so issues can be addressed in advance.

What this means in practice – examples

- A town council must ensure its email addresses are on a council-domain (not free personal accounts). If they are still using @gmail.com or @outlook.com they will fail this element.
- The website must publish all required documents (minutes, AGAR, policies etc) and be accessible to people with disabilities (WCAG 2.2 AA) and have an accessibility statement.
- The council should adopt an I.T. policy at a full council meeting (recorded in the minutes) that addresses digital/data matters, and review it annually as standard good practice.
- The council must know what personal data it holds (e.g., for allotment holders, councillors, volunteers), have procedures for secure handling and disposal, and ensure access controls and backups are appropriate.

Why has this been introduced?

- The increase in digital operations (emails, websites, cloud storage, social media) by parish/town councils means there are greater data risks (lost access, GDPR breaches, cyber-attack, FOI issues).
- The new assertion clarifies and elevates the expectations around digital/data compliance rather than leaving it buried under broader assertions.
- It aims to improve transparency, governance and accountability in local councils.

Next steps for a Town Council

- Check: Does your council have a council-owned domain and generic email addresses? If not, move to that as a priority. **OTC have a .gov website and email addresses so are compliant.**
- Review the website: Is it accessible (WCAG 2.2 AA)? Does it publish all required documentation? **All documents are now being published on the website – the only thing I need to do is publish the expenditure over £500 which I will do shortly. The website developer has advised:**

"We are unable to provide an unqualified confirmation that the Oakham Town Council website is fully compliant with WCAG 2.2 Level AA.

The website is built on a compliant WordPress platform and incorporates appropriate accessibility features within its underlying design and structure. The content management system is password-protected, and a comprehensive security suite is provided through our hosting platform.

However, accessibility compliance relates not only to the website platform itself, but also to all content published on it. This includes page content, headings, links, images and alternative text, as well as all uploaded documents, such as PDFs and Word files.

As the Council manages and publishes its own website content, we do not have direct control over everything added to the site and are therefore unable to certify that the website, in its entirety, currently meets every WCAG 2.2 Level AA requirement.

Formal confirmation of compliance would require an audit covering all of the website's published content and documents.

We can therefore confirm that the website platform includes appropriate accessibility and security provisions, but we cannot confirm full WCAG 2.2 AA compliance without such an audit."

I have ran the site through two accessibility checkers:

- 1) PageSpeed Insights – this shows accessibility of 66/100. Problems are image elements to not have {alt} attributes, links to not have a discernible name, background and foreground colours do not have sufficient contrast, touch targets do not have sufficient size or spacing, heading elements are not in sequentially-descending order.
- 2) Wave – this shows a score of 4/10. Problems are 2 missing alt text, 1 empty button, 1 empty link, 5 broken ARIA menu, 17 contrast errors, and 41 alerts.

Some of these are quick to fix but some are not so this will take time to sort.

- Draft or review your I.T./digital policy and formally adopt it at a meeting. I could not find a policy so have drafted one and added it to the agenda for Council consideration.
 - Conduct a data audit: what personal data do you hold, how is it stored and disposed of? Data Mapping Register added to this agenda for Council consideration.
 - Provide training or awareness for councillors and staff on data protection, secure email/devices, digital practices. Councillors and officers to consider attending an appropriate course. The online courses are all much of a muchness and none seem to be specific to local government. Options:
 - SLCC £30 + Vat per person
 - LRALC £35 + Vat per person
 - Highspeed Training £26 + VAT per person
 - SLCC £38.50 + VAT per person
- I would recommend Highspeed as they are always professional, good courses, and are the cheapest.
- Keep records of your actions and reviews so you can respond "Yes" confidently to Assertion 10 when completing the AGAR. Records are being kept and included within minutes. The external auditor has been informed that Council are not currently compliant but it has been added to this agenda for Council consideration.

3. Legal and Governance Considerations

Assertion 10 is now an audit requirement.

Motions:

That Full Council:

- 1) Note the new Assertion 10 rules and regulations.
- 2) Adopt an I.T. and Data Management Policy (see separate policy).
- 3) Adopt a Data Mapping Register document (see separate document).
- 4) Note that a requirement of Assertion 10 is to ensure that the website is accessible to a high standard (WCAG 2.2 AA) and that the website provider has confirmed that they will be reviewing all sites later in the year ahead of the audit and will make any necessary changes.
- 5) Consider and decide upon online GDPR training for all Officers and Members who require it.

For completion by the office

<i>In Budget</i> <input type="checkbox"/>	<i>Spend Authorised</i> <input type="checkbox"/>	<i>Budget Header:</i>			<i>Amount:</i>
<i>Estimates</i> <input type="checkbox"/>	<i>Quotes</i> <input type="checkbox"/>	<i>Emergency Spend</i> <input type="checkbox"/>	<i>Sole supplier</i> <input type="checkbox"/>	<i>Specialist</i> <input type="checkbox"/>	
<i>P.O</i> <input type="checkbox"/>	<i>Invoice Checked</i> <input type="checkbox"/>	<i>Reason for spend:</i>			
<i>Legal Power: Local Government Act 1972</i> <i>amend as necessary</i>		<i>Contract Finders</i> <input type="checkbox"/>	Supplier:		