

Proposal to the Parish Council:
Adoption Policies in line with the new assertion 10.
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Report to Council: Policy Adoption in Line with Updated Practitioners' Guide and Assertion 10

Background:

The Joint Panel on Accountability and Governance has released an updated Practitioners' Guide for 2024-2025, including a new **Assertion 10**. This assertion strengthens the council's duty to ensure proper arrangements are in place for the management of personal data, security of IT systems, and overall information governance.

To ensure compliance with the new requirements, the council is advised to formally adopt the following key policies:

IT Policy Establishes rules and standards for the use of the council's computer systems, ensuring data security, software compliance, and resilience against cyber threats.

Bring Your Own Device (BYOD) Policy Sets out the conditions under which councillors and staff may use personal devices for council business, addressing security risks and data protection requirements.

Email, Contact and Privacy Policy Clarifies how the council manages contact information and email communication, ensuring compliance with the UK GDPR and good practice in personal data handling.

Freedom of Information (FOI) Policy Outlines how the council meets its legal obligations under the Freedom of Information Act 2000, including response procedures and publication schemes.

Internal Control Policy Provides a framework for ensuring proper financial and administrative controls, risk management, and assurance in line with Assertion 2 and Assertion 10.

Assertion 10

Assertion 10 – Digital and Data Compliance (Assertion 10 added to clarify data compliance, previously covered under Assertion 3). **Note: Assertion 10 will not appear on the AGAR until 2025-2026.**

To warrant a positive response to this assertion, the authority needs to have taken the following actions:

1.47 Email management – Every authority must have a generic email account hosted on an authority owned domain, for example clerk@abcparishcouncil.gov.uk or clrek@abcparishcouncil.org.uk rather than abcparishclerk@gmail.com or abcparishclerk@outlook.com for example.

1.48 All smaller authorities (excluding parish meetings) must meet legal requirements for all existing websites regardless of what domain is being used.

1.49 All websites must meet the Web Content Accessibility Guidelines 2.2 AA and the Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018 (where applicable).

1.50 All websites must include published documents as specified in the Freedom of Information Act 2000 and the Transparency Code for smaller authorities (where applicable).

1.51 All smaller authorities, including parish meetings, must follow both the General Data Protection Regulation (GDPR) 2016 and the Data Protection ACT (DPA) 2018.

1.52 All smaller authorities, including parish meetings, must process personal data with care and in line with the principles of data protection.

1.53 The DPA 2018 supplements the GDPR and classifies an authority as both a Data Controller and a Data Processor.

1.54 All smaller authorities (excluding parish meetings) must also have an IT policy. This explains how everyone – clerks, members, and other staff – should conduct authority business in a secure and legal way when using IT equipment and software. This relates to the use of authority-owned and personal equipment.

Practitioners Guide 2025 - <https://www.nalc.gov.uk/resource/practitioners-guide-2025.html>

Further Measures:

A full GDPR audit was undertaken during the August recess to assess current practice, identify gaps, and make recommendations for improvement. The audit covered data handling, record retention, subject access requests, and training needs.

Recommendation: That the Council:

- Approves the five draft policies listed above.
- Notes that a GDPR audit was conducted in August 2025.