

Navigating Assertion 10

Digital and Data Compliance

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Assertion 10 Compliance & understanding the Practitioners Guide.

Domain Names, Emails, GDPR, Websites & IT Policies

For parish & town clerks



What we'll cover

Updates to SAPP 2025 (formerly JPAG) Practitioners Guide - What the new governance requirement actually means to councils:

- **New Email & domain name requirements** and best practice
- Ensuring **website accessibility compliance** with the **new WCAG2.2AA rules**
- **UK GDPR** and data protection responsibilities
- **IT policies and Assertion 10 explained:** – and how it all fits in together – creating the digital and data scope and purpose.



What's it all about?

2025 edition of the *Practitioners' Guide* (Assertion 10: Digital and Data Compliance) states:

All smaller authorities, by AGAR 2025/2026, must have:

- A council-owned domain based official email address that's generic (**and cease using free email**)
- A website that continues to meet accessibility regulations
- An IT policy
- And a reinforcement of compliance with UK GDPR and DPA responsibilities.



Assertion 10 - Digital and data compliance

WHY? (added to clarify data compliance, previously covered under Assertion 3)

Assertion 10 will appear on the **AGAR 2025-26** By then, 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 **clerk@abcparishcouncil.org.uk**

Not abcparishclerk@gmail.com or **abcparishcouncil@outlook.com**



Councillors & other staff email addresses.

Strangely, Assertion 10 doesn't talk about Councillors and other staff email address compliance – just the clerk/officer.

- ✓ **Best practice is for all council to have matching email:**
Cllr.bobsmith@abcparishcouncil.gov.uk
- ✓ **Free email services are permitted currently but NOT personal:**
cllrbobsmith@gmail.com – OK
- ✗ **BUT NOT** bigbobsmith1968@yahoo.co.uk = GDPR risk/loss of email data/comms



Why is that important?

- The **Council does not own** those free platforms or domain (Gmail, Yahoo, Hotmail etc)
- The **data** contained in it is **not really yours**
- The Council has **no legal rights** over it
- Getting **access without the logins** is impossible
- Creates a **GDPR exposures with FOI & SAR issues**
- **No authenticity of message** – anyone can set up a free email address!



The domain - Your address on the internet

It's **your website address** you use in a web browser, like Google Chrome and Safari for people to see your web pages and information – agendas, minutes, AGAR, news etc

AND

Your email address – the address that people use to send you an email.



LEIGHTON - LINSLADE
TOWN COUNCIL

Your Council

Our Office:

The White House
Hockliffe Street, Leighton Buzzard
Bedfordshire, LU7 1HD

Call us on:

General enquiries: 01525 631920

Email us at:

info@leightonlinslade-tc.gov.uk

Welcome to Leighton-Linslade Town Council
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WE WOULD LOVE YOUR FEEDBACK

We would love to hear what you think of the About Us page. Please provide your feedback. You could be in for a change.



.gov.uk

It's the ultimate official domain for a Council.

- Elevated level of security
- Improves compliance
- Improves GDPR – and FOI & SAR situations
- Added benefits and security services
- More professional
- Improved authenticity of message
- Can only be used managed by authorised organisations for added security & governance

.org.uk

It's an acceptable UK-based domain for a Council.

- Elevated level of security above free emails
- Helps with compliance
- Improves GDPR – and FOI & SAR situations
- Requires less scrutiny so = less official than .gov.uk

You *can* also use .com, .co.uk or other council-owned domain suffix but they are not within the UK jurisdiction managed by Nominet.

Domains - recap

- Stop using free email (Gmail/Hotmail/Yahoo etc)
- Use a **council-owned domain** for your official **email** for the council & website
- Get your **.gov.uk domain for best practice**
- Other council-owned domains are currently acceptable, but website and email should match
- Make sure you set enough in the **budget/precept planning for these services**
- Make sure the **domain name is registered to the council** – not an individual.



Website Accessibility Compliance - update

- Regulations for all public sector bodies, incl parish & town councils' websites must meet WCAG2.1AA standard since 2020
Regulations rose to WCAG2.2AA in October 2024
- You **must have a compliant website**
- Regardless of the domain type, SAPP '25 & Public Sector Website laws require compliance
- You **must have an up to date and relevant Accessibility Statement**
- **Risks?** Challenged by vexatious MOP, audit failure, withdrawal of your .gov.uk domain



Website Accessibility tips

- Ensure the website & the content you upload is accessible
- Define your Accessibility Statement and include the things you know are not accessible – 3rd party documents, content older than 2018
- Avoid using 'accessibility plugins' to achieve compliance – they aren't enough
- Have a checking process – use the free browser checker Wave by WEBAIM to check as you go
- Make sure any forms are web page forms, not documents
- Consider commissioning an accessibility audit to understand your position
- Consider commissioning a purpose-built website from council website experts, Aubergine, that's .gov.uk-ready and fully compliant from £499 + VAT



Website Accessibility tips

- ✓ Avoid using tables where possible
- ✓ Add ALT text for images
- ✓ Avoid embedding text on images
 - events need the salient info on the web page
- ✓ High Contrast
- ✓ Use structured headings (H1, H2, H3..)
- ✓ Make documents accessible before uploading
- ✓ Forms need to be web forms, not PDFs
- ✓ Use descriptive link text (not 'click here'!)
- ✓ Avoid pasting URLs on the page
- ✓ Avoid overly styled text formatting
- ✓ Avoid 'accessibility plugins'
- ✓ Avoid scans where possible (3rd party documents/AGAR/ROI excluded)
- ✓ Have a regular checking process
- ✓ Revisit your accessibility statement

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IT Policies & Assertion 10

- What Assertion 10 requires in relation to IT policies
- What the Practitioners' Guide says an IT policy must do
- What “securely and legally” means in practice
- How email and domains link back to the IT policy



Assertion 10: IT Policy

Requirements

- “All smaller authorities (excluding parish meetings) must also have an IT policy.”
- The IT policy must explain how authority business is conducted
- Applies to **clerks, members and other staff**
- Covers **authority-owned and personal equipment**



Practitioners' Guide: Purpose of an IT Policy

- ▶ **Prevents misunderstandings** when using IT equipment
- ▶ Ensures there are **no excuses** for unsafe or insecure behaviour
- ▶ Sets **clear expectations** for everyone in the authority
- ▶ Templates must be **personalised** to reflect how the council actually works



“Securely and Legally”: What That Means in Practice

What an IT Policy Must Explain

- ▶ **“How everyone should conduct authority business in a secure and legal way”**
- ▶ What is expected when using **passwords and user accounts**
- ▶ How **personal and council devices** may be used
- ▶ Rules for **remote working and mobile access**
- ▶ How incidents, mistakes or concerns are **reported**



IT Policies, Domains, Email & Data Protection

- ▶ **IT Policy** sets the rules for how council business is done
- ▶ **Authority-owned domains** establish ownership and control
- ▶ **Authority-owned email** keeps communications in a managed environment
- ▶ **Data Protection compliance** depends on all three working together

“Secure and legal use of IT underpins GDPR, FOI and SAR obligations.”

