

Assertion 10 – Annual Meeting AGAR Compliance (AGENDA ITEM 10)

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 A 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.

Assertion 10 is to be formally adopted at the 18th May 2026 Annual Meeting of the parish council and to be incorporated into the 2025/2026 AGAR.

	Criteria and requirements of compliance:	Evidence / Link:	Date of adoption:	Review date / Comments:
1.0	Email and Communication Systems		18 May 2026	May 2027
a)	All official correspondence uses a Council domain email address (e.g., @xxxxx-pc.gov.uk).	https://wroughton.gov.uk/meet-the-councillors/ The parish council subscribes to Vision ICT and Flotek who ensure out council email addresses are part of an official government/public-sector domain (e.g., name@department.gov.uk). ☑ Is supported by technical email security measures (TLS, DMARC, SPF, DKIM).	“	
b)	Email systems are monitored, backed up, and secured with appropriate IT controls.	IT and Digital Use Policy still to be adopted post 18 th May. Emails are also backed up via Flotek Group, the parish councils IT, Cloud Based provider. https://wroughton.gov.uk/general-council-information/	“	
c)	Email policies exist and are regularly reviewed.	IT and Digital Use Policy still to be adopted post 18 th May. https://wroughton.gov.uk/general-council-information/	“	
d)	Councillors’ official communications follow GDPR principles and Council communication policy.	The parish council has adopted both a Communications Policy, a Data Protection and Information Security Policy	“	

		and also a GDPR statement. (3 New versions adopted on 18 th May) https://wroughton.gov.uk/general-council-information/		
2.0	Website Accessibility and Info		18 May 2026	May 2027
a)	The Council's website complies with Web Content Accessibility Guidelines (WCAG) 2.2 AA standards.	https://wroughton.gov.uk/accessibility/ When visiting the parish council website users are prompted to check accessibility criteria etc. Font size and colour scale.	"	
b)	An up-to-date Accessibility Statement is published on the website.	https://wroughton.gov.uk/website-accessibility-statement/ New updated version to be adopted on 18 th May 2026.	"	
c)	Website content is reviewed for accessibility compliance (alt text for images, correct document formats, appropriate colour contrast, etc.).	Yes, reviewed by the parish council annually also reviewed by Clearwater our external website provider. Link to the policy will be uploaded post 18 th May 2026. To support accessibility, our website includes the UserWay Accessibility Widget , which is located on the right side of each page.	"	
d)	Website content is kept up to date, including agendas, minutes, policies, and financial information as required by the Transparency Code.	Yes, link here: https://wroughton.gov.uk/agendas-minutes/ All councillors also issued with a copy of the Good Councillors Guide. https://www.nalc.gov.uk/resource/nalc-publishes-an-updated-edition-of-the-good-councillor-s-guide.html	"	
e)	Publication of Council information aligns with the ICO Model Publication Scheme.	https://wroughton.gov.uk/general-council-information/ the parish council has a FOI policy, and a new version will be adopted on 18 th May 2026.	"	
3.0	Data Protection Compliance (UK GDPR & DPA 20185)		18 May 2026	May 2027
a)	A Data Protection Policy is adopted and reviewed annually.	https://wroughton.gov.uk/general-council-information/ New updated version to be adopted on 18 th May 2026.	"	

b)	A Data Protection Officer or designated responsible officer is appointed.	Yes – the Clerk is the Data Protection Officer as adopted by the Data Protection and Information Security Policy – current version https://wroughton.gov.uk/general-council-information/ to be renewed at 18 th May 2026.	“	
c)	A record of processing activities is maintained.	Ref Data Protection Policy https://wroughton.gov.uk/general-council-information/ to be renewed at 18 th May 2026. Refer to Privacy Notice also to be renewed 18 th May 2026.	“	
d)	Data Protection Impact Assessments (DPIAs) are conducted for relevant projects.	Ref Data Protection Policy https://wroughton.gov.uk/general-council-information/ to be renewed at 18 th May 2026.	“	
e)	Procedures exist for Subject Access Requests (SARs) and are compliant with statutory timelines.	Ref Data Protection Policy https://wroughton.gov.uk/general-council-information/ to be renewed at 18 th May 2026.	“	
f)	Secure storage and disposal protocols for personal data are in place.	Ref Data Protection Policy https://wroughton.gov.uk/general-council-information/ to be renewed at 18 th May 2026. Also see the Records Management Policy – again updated on 18 th May 2022	“	
4.0	Freedom of Information Act (FOI) Compliance		18 May 2026	May 2027
a)	An FOI Policy is adopted and publicly available.	https://wroughton.gov.uk/general-council-information/ Ref to the Freedom of Information Act Policy - be renewed at 18 th May 2026.	“	
b)	The Council has adopted the ICO Model Publication Scheme.	https://wroughton.gov.uk/general-council-information/ the parish council has a FOI policy, and a new version will be adopted on 18 th May 2026.	June 2026	
c)	A clear procedure exists for handling FOI requests.	https://ico.org.uk/media2/for-organisations/documents/1153/model-publication-scheme.pdf - this version requires adoption by the	“	

		parish council. Not yet done, will need to be actioned in June.		
d)	The Council responds to FOI requests within statutory deadlines (20 working days for FOI, 40 working days for EIR where applicable).	https://wroughton.gov.uk/general-council-information/ the parish council has a FOI policy, and a new version will be adopted on 18 th May 2026.	“	
e)	A Disclosure Log is maintained and accessible on the website.	NA currently May 2026	Incomplete	Pending info as currently no disclosures to log – should this still be listed on web?
5.0	IT and Cybersecurity Governance		18 May 2026	May 2027
a)	IT policies and acceptable use guidelines are in place for councillors, staff, and volunteers.	https://wroughton.gov.uk/general-council-information/ Ref to the IT and Digital Use Policy a new version will be adopted on 18 th May 2026.	“	
b)	Antivirus, firewall, and software update protocols are in place and regularly reviewed.	Yes – subscribe to Flotek for the IT support and security, also they advise and when updates are live	“	
c)	Backups of digital records are performed regularly and securely stored.	Yes, USB drive back ups of Payroll and OMEGA accounting are all carried out. USB drives are then kept in the parish office safe.	“	
d)	Cybersecurity training is provided to all relevant parties.	Yes – via Flotek (Previously Microshade) via monthly subscription to parish council software hosting. New annual training due for 2026/2027.	Needs renewing	
6.0	Record Keeping and Audit Trail		18 May 2026	May 2027
a)	All key decisions, agendas, and minutes are published in line with Transparency Code requirements.	Yes https://wroughton.gov.uk/meetings/		
b)	A document retention policy is adopted and implemented.	https://wroughton.gov.uk/general-council-information/ to be renewed at 18 th May 2026. Also see the Records Management Policy – again updated on 18 th May 20226		

c)	Records of FOI, SAR, and other information governance requests are maintained.	To evidence – currently not applicable	TBC	
d)	An internal audit trail exists to confirm compliance with data protection and FOI obligations	To evidence – Still to do	TBC	
7.0	Training and Awareness		18 May 2026	May 2027
a)	All councillors and staff receive regular training on FOI, GDPR, and website accessibility obligations.	New annual training due for 2026/2027.		
b)	Training records are maintained.	Yes – Internal Training matrix saved in shared drive. Cloud based and so backed up.		
8.0	Annual Review		18 May 2026	May 2027
a)	A formal review of Assertion 10 compliance is conducted annually before approving the AGAR.	This is the first review of Assertion 10 – 2025/2026 Financial Year.		
b)	Any issues identified are addressed and recorded.	Yes		