

Meeting Report

Agenda Item: 25/779 – Assertion 10

The Smaller Authorities' Proper Practices Panel (SAPPP) released the updated 2025 edition of the Practitioners' Guide, offering essential updates to support local councils and smaller authorities in managing governance and financial duties with greater clarity.

In addition to confirming councils must follow existing compliance (GDPR & DPA for security and privacy, FOI & Transparency Code for document publishing), the 2025 edition of the Practitioners' Guide states that all small authorities must comply to a new Assertion (Assertion 10: Digital and Data Compliance).

Assertion 10 is a new requirement introduced for local councils starting from the 2025/26 financial year as part of the Annual Governance and Accountability Return (AGAR). It focuses on digital and data compliance, requiring councils to demonstrate their governance frameworks for digital presence, data protection practices, and IT management.

Key requirements include:

1) Ensuring a generic email account hosted on an authority-owned domain.

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

**2) Meeting Website Accessibility Compliance (WCAG 2.2. AA)
Accessibility Standards for Websites**

Website Accessibility Compliance

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).

- Regulations for all public sector bodies, incl. parish & town councils' websites must meet WCAG2.1AA standards, which have been in place since 2020
- Regulations rose to WCAG2.2AA in October 2024 with revisions in 2025
- The council must have a compliant website
- Regardless of the domain type, SAPPP '25 & Public Sector Website laws require compliance
- The council must have an up to date and relevant Accessibility Statement
- .gov.uk domains must be used and not used in a non-compliant way

3). **Maintaining an IT policy that covers the secure use of digital devices.**

(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.

As local authorities shift more of their operations online—emailing agendas, sharing sensitive documents, updating websites, and even engaging on social media—having clear digital protocols has become essential.

A formal IT policy provides a simple, central document outlining how digital tools and information should be managed securely and professionally.

4). **Confirming compliance with UK GDPR and the Data Protection Act 2018. This assertion aims to enhance transparency and accountability in how councils manage personal data and digital communications.**

In essence, more focus is being placed on the way smaller authorities handle and manage data through proper practices as outlined in the NEW I.T. and Data Compliance Policy.

5). Action Taken

The Council are already covered for items 1 and 2 of the aforementioned, due to having email accounts which are already hosted on an authority owned account, are in line with the .gov.uk rules, including the website domain.

The website privacy notice and expected standards are currently up to date and are regularly maintained by the Clerk and website provider, Parish Council Websites.

Please review **Appendix A** for the current and most up to date Accessibility Statement on our website. The link to view it online is here:

[Accessibility Statement – Naseby Parish Council](#)

Please review **Appendix B** for the current and most up to date Privacy Notice/Policy, which again, is regularly reviewed and updated by the Clerk and Parish Council Websites. The link to view it online is here:

The only items which are new and required to ensure the council are fully compliant with the new Assertion 10 is the IT and Data Compliance Policy, which has been created in line with regulations and is to be reviewed and approved by Council at its October meeting.

The Clerk will ensure that all practices are adhered to in accordance with these new measures and all items are maintained in preparation for the current financial year's audit taking place in April 2026, and for all future audits moving forward.

Appendix A: Accessibility Statement for Naseby Parish Council

This accessibility statement applies to <https://nasebyparishcouncil.gov.uk>. This website is run by Naseby Parish Council.

The Council are committed to ensuring digital accessibility for all users, including those with disabilities. This statement outlines our efforts to meet the requirements of **Assertion 10** under the 2025 Practitioners' Guide for smaller authorities and want as many people as possible to be able to use this website. For example, that means you should be able to:

- change colours, contrast levels and fonts
- zoom in up to 300% without the text spilling off the screen
- navigate most of the website using just a keyboard
- navigate most of the website using speech recognition software
- listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

To assist with website accessibility, Naseby Parish Council has installed the [UserWay Accessibility Widget](#).

Located at the bottom left of the website, this widget offers a broad selection of functions that users can mix and match to meet their individual accessibility needs. Each of the functions can be turned on or off or set at an interim value. Furthermore, settings for each user are automatically saved (via a cookie) for future site visits. The functions include, but are not limited to:

- **Keyboard Navigation:** Navigate most of the website using just a keyboard.
- **Read Page:** Listen to most of the website.
- **Contrast:** Change contrast levels. Choose from the following: normal contrast, invert colours, dark contrast, light contrast and desaturate.
- **Highlight Links**
- **Bigger Text:** Choose from four increasing font sizes without the text spilling off the screen.
- **Text Spacing:** Modify line spacing for improved readability for dyslexic and visually impaired users.
- **Stop Animations**
- **Legible Fonts**
- **Reading Guide:** Converts the cursor into a high contrast horizontal reading guide. Focuses and guides the eyes to reduce eye strain for users who are visually impaired, dyslexic and users with Presbyopia.

- **Tooltips:** Shows alternative text and aria labels for on-screen elements with a simple mouse hover. Tooltips are prominent, high contrast and easy to read for low vision users with accessibility needs.

We've also made the website text as simple as possible to understand.

[AbilityNet](#) has advice on making your device easier to use if you have a disability.

How accessible this website is

We know some parts of this website are not fully accessible:

- **Non-Accessible Content:** Some older documents including PDF's may not yet meet accessibility standards and are not fully accessible with screen reader software. The Council will provide accessible alternatives upon request.

Review and Updates: This statement was last reviewed on **27 September 2025** and will be updated annually or as needed.

Feedback and contact information

What to do if you cannot access parts of this website

If you need information on this website in a different format:

- email parish.clerk@nasebyparishcouncil.gov.uk
- call 07471 134931

We strive to respond to all inquiries within 15 working days.

Reporting accessibility problems with this website

We're always looking to improve the accessibility of this website. If you find any problems not listed on this page or think we're not meeting accessibility requirements, contact:

- The Parish Clerk, Josie Flavell via email at paish.clerk@nasebyparishcouncil.gov.uk
 - Call the Parish Clerk, Mrs Josie Flavell on 07471 134931
 - Via our contact form; <https://nasebyparishcouncil.gov.uk/contact-us>
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Enforcement procedure

The Equality and Human Rights Commission (EHRC) is responsible for enforcing the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the 'accessibility regulations'). If you're not happy with how we respond to your complaint, [contact the Equality Advisory and Support Service \(EASS\)](#).

Contacting us by phone or visiting us in person

Find out how to contact us: <https://nasebyparishcouncil.gov.uk/contact-us>

Technical information about this website's accessibility

Naseby Parish Council is committed to making its website accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Compliance Status

This website is partially compliant with the [Web Content Accessibility Guidelines version 2.1](#) AA standard due to the non-compliances listed below.

- Older PDF files such as Meeting Minutes and Agendas published before 23rd September 2018.
- Scanned documents such as Conclusion of Audit or documents that may include a signature.
- Videos
- Content produced by third parties or using third party software.

Third party software includes but is not limited to:

- *Google Maps*
The Google Maps that are embedded on a number of pages throughout the website are not accessible for screen readers. The pages on which these maps appear include the Contact page. The maps do not meet WCAG 2.1 success criterion 1.1.1 (non-text content). However, to reduce the impact of these maps being inaccessible to some readers, we have provided a written address for each event venue location on the individual event pages.
- *Google reCAPTCHA*
The reCAPTCHA anti-spam software used for the online forms on the Contact page does not meet WCAG 2.1 success criterion 2.4.6 (headings and labels). Users who are unable to use these online forms are encouraged to contact the Parish Clerk, Mrs Josie Flavell, parish.clerk@nasebyparishcouncil.gov.uk outlining the subject-matter of their query, and the Clerk can forward their query on to the appropriate person.

Disproportionate Burden

Nothing is cited as being a disproportionate burden

Content that's not within the scope of the accessibility regulations.

PDFs and other documents

Many of our older PDFs and Word documents do not meet accessibility standards - for example, they may not be structured so they're accessible to a screen reader. This does not meet:

- WCAG 2.1 success criterion 4.1.2 (name, role value).
- WCAG 2.0 success criterion 2.4.5 Multiple Ways
- WCAG 2.0 success criterion 2.4.8 Location

The accessibility regulations [do not require us to fix PDFs or other documents published before 23 September 2018](#) if they're not essential to providing our services. For example, we do not plan to fix documents such as agendas, minutes and financial documents prior to 2018.

The Council are required, by law, to upload a number of documents that have been approved and signed (the end of year audit for example), this is done by scanning the document and uploading as a PDF filetype. The very nature of a scanned document is not accessible and often OCR conversion of the document is not perfect. This will be reviewed, likely in 2025 to see if technology or regulations have changed.

Any new PDFs or Word documents the Council publish will aim to meet accessibility standards, unless these documents are in a format which cannot be made accessible easily. If you are unable to access any document on this website due to its format, please contact the Clerk via the methods mentioned above.

What we're doing to improve accessibility

We will be running regular accessibility checks and ensure that new content added to the website meets accessibility requirements where possible.

Preparation of this accessibility statement

This statement was prepared on 125th September 2025.

This website was last tested on 25th September 2025. The test was carried out via Naseby Parish Council (self-evaluation) on representative pages following the Government accessibility checklist and using the [Wave Accessibility Evaluation Tool](#).

We focused on the most popular website pages to test, including the homepage and the meetings documents page.

Appendix B: Privacy Policy/Notice (Website)

Data Privacy Policy

Naseby Parish Council is committed to keeping your personal data safe and secure. As part of this commitment, we've updated our Privacy Policy to meet the high standards of the new European data protection law, known as the General Data Protection Regulation (GDPR) 2018.

This Privacy Policy sets out how we collect, use, store and protect your personal data. Our Privacy Policy also sets out clear information about your rights in relation to your personal data. Naseby Parish Council is the Data Controller for personal data about individuals.

1.0 Key Definitions

Data processing: Data processing is any activity that involves the use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties.

Personal data: Personal data is any information identifying a data subject (a living person to whom the data relates). It includes information relating to a data subject that can be identified (directly or indirectly) from that data alone or in combination with other identifiers Naseby Parish Council possesses or can reasonably access. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

2.0 How we process your personal information

We do not trade personal data for commercial purposes and will only disclose it if required by law, if it is necessary to arrange a service you have asked us for, or if it is with your consent. We will not use your information for automated decision making or profiling. Naseby Parish Council uses providers (processors) based in the European Economic Area to process associate data.

3.0 Information you give to us

This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, email or otherwise. It includes information you provide when you:

- Use our website
- Order any services or products offered by us or register for our promotional events
- Register to receive downloadable information, newsletters or other information
- Send us a request to contact you or when you report a problem with our product or services

The information you give us may include your name, position, address & post code, email address and phone number.

We will use this information to:

- send you information you have requested
- process orders for products and services
- inform our marketing and sales activities
- provide you with news and information which we think may be of interest to you and with information about our products and services

If you no longer wish us to use your data in this way, please let us know by clicking the unsubscribe button on our communications page or emailing us on parish.clerk@nasebyparishcouncil.gov.uk

4.0 Information we collect about you

With regard to each of your visits to our website we will automatically collect the following information:

Information about your visit, including items you viewed or searched for; page response times; length of visits to certain pages.

We will use this information:

- to administer our site so that it works well when you visit (we may also ask you for your opinion to help us do that) and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer
- to allow you to participate in interactive features of our services, when you choose to do so as part of our efforts to keep our site secure

5.0 Information we receive from other sources

This is the information we receive about you:

From our third party service providers (including, for example, sub-contractors in technical and delivery services, search information providers).

6.0 Legal basis for processing your information

We process your personal information lawfully and fairly in accordance with data protection laws. We may process your personal information where we are:

- performing our business functions and activities generally
- providing services to you
- in receipt of your consent to our processing of your personal information
- presented with a legal obligation to do so or we have a legitimate interest to do so, for

example on a business sale or for fraud prevention purposes

7.0 Sharing your information

We may disclose your personal information to third parties, including:

- Our professional advisers and services providers with whom we work collaboratively to bring you services and information you have requested. In all circumstances this will be made clear at the time of collecting your data.
- If Naseby Parish Council or substantially all of its assets are acquired by a third party, in which case personal data held by us about you will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation or in order to enforce or apply our Terms & Conditions. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

8.0 Where we store your personal data

All email information you provide to us is stored in our databases on a secure server located within the EEA (European Economic Area).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9.0 Retention of your personal data

We will only keep your personal data within the time-frames allowed by law and for so long as is necessary to comply with our legal obligations.

10.0 Your rights under the GDPR

10.1 Access to personal information

Individuals who are the subject of personal data held by Naseby Parish Council are entitled to:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations

If an individual contacts the company requesting this information, this is called a subject access request or SAR. Subject access requests from individuals should be made by email, addressed to parish.clerk@nasebyparishcouncil.gov.uk

We will respond to Subject Access Requests within one month as is the requirement under GDPR. We will always verify the identity of anyone making a subject access request before handing over any information.

10.2 Correcting personal information

Individuals may ask us to correct any personal information about them that is inaccurate, incomplete or out of date.

10.3 Deletion of personal information

Individuals have the right to ask us to delete personal information about them where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and that consent has been withdrawn
- You have validly objected to our use of their personal information
- Our use of your personal information is contrary to law or our other legal obligations

10.4 Objecting to how we may use personal information

Individuals have the right at any time to require us to stop using their personal information for direct marketing purposes.

10.5 Restricting how we may use personal information

In some cases, individuals may ask us to restrict how we use their personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold or assessing the validity of any objection made by an individual to our use of their information. The right might also apply where there is no longer a basis for using an individual's personal information, but they don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with the individual's consent, for legal claims or where there are other public interest grounds to do so.

10.6 Withdrawing consent to using personal information

Where we use personal information with individual consent the individual may withdraw that consent at any time and we will stop using that personal information for the purpose(s) for which consent was given.

For queries as to whether the GDPR applies to the processing of your personal information or, if the GDPR does apply, and you wish to exercise any of these rights then please contact us. Please use the Contact information on our website.

11.0 Changes to our privacy policy

We keep this privacy policy under regular review and will place any updates on this website. This policy was updated in September 2025 to show that we are adhering to the General Data Protection Regulation (GDPR), which came into force in May 2018.

12.0 Complaints

We seek to resolve directly all complaints about how we handle personal information. Please review our Complaints Policy using the below link to find out how to make a complaint. <https://nasebyparishcouncil.gov.uk/parish-council/policies-and-procedures>

However, you also have the right to lodge a complaint with the ICO (Information Commissioner's Office) who are the regulators of data protection laws in the UK. They can be contacted via their website <https://ico.org.uk/make-a-complaint/>.