

HOLBROOK PARISH COUNCIL

PRACTITIONERS' GUIDE ASSERTION 10 – DIGITAL COMPLIANCE

What is SAPP (Practitioners' Guide) – [Small Authorities' Proper Practice Panel](#) (previously JPAG, Joint Panel on Accountability and Governance).

What is the Practitioners' Guide – It supports the preparation of the Annual Governance and Accountability Return (AGAR) and provides best practice that all councils should follow.

What is Assertion 10 – A new assertion on the AGAR whereby the Council must state whether it has followed digital and data compliance during the current financial year.

When did Assertion 10 come into force – It came into force on 1 April 2025 and is part of the AGAR for the financial year ending March 2026.

Holbrook Parish Council has taken various steps to ensure that they are compliant with the statements below, the Clerk has attended training courses and Councillors have been kept informed of developments, such as the Audit report of the Council's website and the adoption of an IT Policy.

Is Holbrook Parish Council currently compliant with Assertion 10?

What	How	Compliant
Data protection and security	Using authority-owned email accounts.	
Accountability and transparency	Using authority-owned email accounts.	
Consistency, trust and professionalism	Using authority-owned email accounts.	
Ease of data gathering for Data Subject Access or Freedom of Information requests.	Using authority-owned email accounts.	
IT Policy which covers use of emails.	Having a clear IT Policy	
Website	Authority-owned website.	
Website accessibility	At a minimum the website must include an accessibility statement which explains why some or all the website is not compliant. This can be carried out if it would place a disproportionate financial burden on the council to update the website.	
Data Protection	Registered with the ICO as a data controller.	
Freedom of Information	Publication scheme.	
Transparency Code*	Publishing all documents and financial information required.	

[The Transparency Code for Smaller Authorities is mandatory for Councils with a turnover of less than £25,000. However, it is still best practice to adhere to the code if the Council has a turnover of between £25,000 and £200,000 (i.e. Holbrook PC). Councils with turnover above £200,000, must adhere to the Local Government Transparency Code 2015.]

Holbrook Parish Council migrated in December 2023 ago to .gov domain website and email addresses

Why use a .gov domain/email – It enhances credibility, security, and professional management. It increases trust, credibility and public recognition. There are improved levels of security with Government-level protection (which is important during a time when there have been increased cyber security incidents). Whilst [council name] is the bottom tier of local government, it is still a government body. It is likely that at some point in the future a .gov domain will become mandatory.

What will happen if the Council doesn't update the website domain/emails and thus answers 'No' to Assertion 10 – There will be an 'except for matters' raised on the external audit. Copies of minutes and any agreed plan showing corrective action to be taken to address these matters will be requested at the following years audit. If further action is not carried out to allow a 'Yes' response on the following years audit, a further 'except for matters' will be raised. This could lead to increased scrutiny by the external auditor of the Councils finances and practices. Whilst this would not be a problem, per se, it will increase the Clerks workload and could lead to additional expenditure.

All external audit reports are published, which means the public may question why the Council is not ensuring it is compliant with Assertion 10. Members of the public could raise this as an issue with the auditor during the public inspection period. This could result in further expenditure for the Council as the auditor undertakes increased scrutiny of the accounts and proper practice. This in turn would increase the workload of the Clerk.

Training: All councillors are encouraged to undertake regular training on GDPR. The ICO (Information Commissioner's Office) have free online training on the following link:

[Training videos | ICO](#)

Training is also available from SALC and NALC – see the training bulletins which are emailed to councillors regularly. If Councillors would like to access any of the SALC or NALC course, please let the clerk know.