



# FARNHAM TOWN COUNCIL

## D Annex 1

### Report

#### Assertion 10: Digital and data compliance

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**Date: 9/02/2026**

**Report on Farnham's Compliance with Assertion 10 – Digital and Data Compliance  
(Practitioners' Guide 2025 Edition – Assertion applicable from AGAR 2025/26)**

#### 1. Introduction

This report confirms how Farnham Town Council complies with Assertion 10: Digital and Data Compliance, as set out in the 2025 edition of *Governance and Accountability for Smaller Authorities in England*.

Assertion 10 consolidates and clarifies requirements relating to digital governance, website compliance, accessibility, data protection, and information security. The Council has reviewed its arrangements against the specific actions listed at paragraphs 1.47 to 1.54 of the Guide and confirms full compliance.

#### 2. Email Management (Paragraph 1.47)

Farnham Town Council operates generic email accounts hosted on an authority-owned domain (farnham.gov.uk). These accounts are used for all official council business and includes role-based addresses (eg [town.clerk@farnham.gov.uk](mailto:town.clerk@farnham.gov.uk)) as well as individual named emails (eg [firstname.surname@farnham.gov.uk](mailto:firstname.surname@farnham.gov.uk) for staff and councillors rather than individuals using their own personal emails for council business

This approach:

- Ensures continuity and resilience
- Supports transparency and audit trails
- Reduces data protection and security risks
- Meets the Practitioners' Guide requirement to avoid third-party consumer email services for official correspondence

#### 3. Website Legal Compliance (Paragraph 1.48)

The Council maintains an official website (farnham.gov.uk) that meets all legal requirements applicable to smaller authorities. The website is actively maintained and reviewed to ensure ongoing compliance with statutory publication duties and good governance practice.

#### 4. Website Accessibility (Paragraph 1.49)

Farnham Town Council's new website was designed and is maintained to comply with:

- Web Content Accessibility Guidelines (WCAG) 2.2 at AA standard, and
- The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018

An accessibility statement is published, and reasonable steps are taken to ensure that:

- Content is perceivable, operable, understandable, and robust
- Documents are provided in accessible formats where required
- Requests for alternative formats are responded to appropriately

#### 5. Publication of Statutory Information (Paragraph 1.50)

The Council publishes all documentation required under:

- The Freedom of Information Act 2000, and
- The Transparency Code for Smaller Authorities (where applicable)

This includes, but is not limited to:

- Agendas, minutes, and meeting papers
- Financial information, budgets, and accounts
- Policies and governance documents
- Contact details and councillor information

Publication is timely, accurate, and accessible to the public and is checked by the Council's Internal Auditor annually.

#### 6. Data Protection Compliance (Paragraphs 1.51–1.53)

Farnham Town Council fully complies with:

- The UK General Data Protection Regulation (GDPR) 2016, and
- The Data Protection Act 2018

The Council recognises its role as both:

- A Data Controller, and
- A Data Processor, as defined by the DPA 2018.

The Council processes personal data lawfully, fairly, and transparently, in line with the six data protection principles, ensuring that personal data is:

- Used only for legitimate purposes
- Adequate, relevant, and limited
- Accurate and up to date
- Stored securely
- Retained only for as long as necessary

Appropriate policies, privacy notices, and procedures are in place to support compliance.

#### 7. IT Policy and Secure Use of Technology (Paragraph 1.54)

Farnham Town Council has an adopted IT Policy which applies to:

- Councillors
- The Clerk
- Other officers and contracted staff

The policy sets out clear expectations for:

- Secure and lawful use of IT systems
- Use of authority-owned and personal devices for council business

- Password management, data security, and information handling
- Cyber security awareness and good practice

This ensures that council business is conducted securely, legally, and consistently. The policy is due for review in 2026.

#### 8. Conclusion

Based on the arrangements outlined above, Farnham Town Council confirms that it meets all requirements of Assertion 10 – Digital and Data Compliance as defined in the 2025 edition of the Practitioners' Guide.

The Council has appropriate systems, policies, and practices in place to ensure lawful digital operation, accessibility, transparency, and robust data protection, and is therefore able to give a positive assurance in respect of this assertion for the 2025/26 AGAR.

#### **Recommendation:**

**Farnham Town Council confirms it meets the requirements of Assertion 10 for the 2025/26 financial year.**