

# St Paul Malmesbury Without Parish Council

## Report #05.5

### Digital and Data Compliance

#### 1. Purpose of the report

- 1.1 To request Council to discuss the implications of these requirements and to agree the adoption of an IT policy, a Freedom of Information publication scheme, a website compliance statement and a revised Data Protection Policy.

#### 2. Background

- 2.1 The Clerk has identified a requirement on the Council to adopt these documents. While representing best practice in themselves, they would also enable compliance with AGS Assertion 10 as part of the upcoming AGAR procedures. While there is some overlap with our existing GDPR policies and statements there are significant additional elements. Draft documents, and Assertion 10 itself, have been circulated with this report. These documents are believed to cover the necessary areas, although a speedy review is recommended as improved versions could be possible.
- 2.2 The IT policy will have the greatest impact on Cllrs. The elements that apply to the clerk's use of council provided devices and formal storage of records is already complied with and is relatively straightforward. However, the implications for Cllrs need to be understood and followed. For most Cllrs this will require a change of practice. The key change would be that all must adopt the use of a council email address for council business (Cllr Briggs already uses this). Such addresses are linked to the website and provided by the host. The council needs to decide whether to adopt the recommended .gov address format or that currently used by Cllr Briggs and the clerk. It is recognised that these changes would take time to implement.
- 2.3 Additionally the adoption of an IT policy is a timely reminder of good practice when using personal devices for council business. Use of strong passwords and regular housekeeping on both emails and documents is essential and should be undertaken regularly by all councillors. The clerk is the holder of council records, essential emails and confidential information that does need to be stored.
- 2.4 The updated accessibility compliance requirements for our website are stated as met by our provider. The clerk is investigating the impact on the council's own uploaded documentation, and particularly on other items that the council uploads for information to residents, such as notifications from Wiltshire Council. The AGS requirement permits declarations of compliance that acknowledge that there are some more difficult areas which are being addressed. This has been added by the Clerk to the website and future work will be undertaken to further improve the accessibility of the council's website.
- 2.5 The proposed Freedom of Information publication scheme circulated is based on the Information Commissioners model scheme and should therefore be compliant.
- 2.6 This Council's General Privacy Policy appears to contain the required information for the Data Protection Policy referred to in Assertion 10 and has been revised and retitled. The website provider has uploaded a separate Privacy Statement onto the website.

#### 3. Options

- 3.1 To do nothing

- 3.2 to adopt some, but not all of the policies, statements and schemes
- 3.3 to request amendments
- 3,4 to agree to the adoption of all documents required under AGS Assertion 10

#### 4 Financial Implications

- 4.1 The only financial implication would be the need to achieve access to two more email addresses from our website hosts than are currently included in the council's contract. This would potentially increase the cost of webhosting from £13 to £26 per month: an additional £156 per year.

#### 5. Recommendation

- 5.1 It seems clear that anything other than 3.4 would render the Council non-compliant, It is therefore strongly recommended that the council adopt the proposed new and revised policies, statement and publication scheme and agree to move to the use of specific council email addresses by all councillors.

Cllr Deborah Clogg  
May 2026