



TODMORDEN TOWN COUNCIL

Report To	Full Council
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Date	18 th February 2026
Subject	Assertion 10 Compliance

Purpose of Report

1. To brief Members on the newly introduced AGAR Assertion 10, to set out the Council's current position against its requirements, and to seek endorsement of a phased approach to achieving full compliance.

Background

2. AGAR Assertion 10 is a new audit requirement which confirms that a council has met its digital and data compliance obligations during the financial year. The assertion is based on four key pillars:
 - A website that meets current statutory requirements, including WCAG 2.2 AA accessibility standards
 - Domain-based email accounts for councillors and staff
 - Ongoing compliance with data protection and GDPR requirements
 - Appropriate IT and information governance policies in place

Current Position

3. Officers have reviewed the Council's position against Assertion 10 and can confirm that the Council is fully compliant with three of the four pillars, namely:
 - Domain-based email provision
 - GDPR and data protection compliance
 - IT and information governance policie
4. The remaining area of challenge relates to website accessibility, specifically compliance with WCAG 2.2 AA. As a result, officers do not consider that the Council will be in a position to confidently confirm full compliance with Assertion 10 for the current audit year.

Implications of Non-Compliance

5. Where a council is not fully compliant with one or more elements of Assertion 10, it would not be appropriate to confirm that assertion in full within the AGAR.
6. This does not constitute a failure of governance, provided that the Council:
 - Is aware of the issue
 - Has formally acknowledged it
 - Has a clear and proportionate plan in place to address it

Proposed Approach

7. Officers propose a phased and proportionate approach to addressing website accessibility, with the aim of achieving full compliance with AGAR Assertion 10 by 31 March 2027. Key elements of this approach include:
 - Prioritising governance assurance actions, including an up-to-date Accessibility Statement which is appended to this report for Member approval.
 - Progressively addressing website accessibility issues where possible in-house
 - Working towards WCAG 2.2 AA compliance in advance of the 2027 deadline wherever practicable

Financial

8. At this stage, it is not clear whether all required accessibility improvements can be delivered in-house. There may be future financial implications if specialist professional support or technical redevelopment is required. Should this be the case, officers will report back to Members with further detail and seek approval as appropriate.
9. No immediate financial decision is required at this stage.

Recommendation

10. That Full Council to endorse the proposed phased approach to achieving full compliance with AGAR Assertion 10 by 31st March 2027, and notes that Officers will report back to Members as work progresses and as further information becomes available as recommended by the Resources Committee

Policy Implications:

N/A

Climate Change:

N/A

Impact Equality Assessment

N/A

Supporting Papers:

Appendix 1: Revised Accessibility Statement

Further Information, Please Contact: N Pugh or N Crewe

Appendix 1:

Accessibility Statement

Todmorden Town Council wants 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)

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 is this website?

- most older PDF documents are not fully accessible to screen reader software
- some documents after September 2018 may not be accessible as they were received as scans or jpeg files

What to do if you can't access parts of this website

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

- email: admin@todmorden-tc.gov.uk
- call: 07923257878

We'll consider your request and get back to you in 14 days.

Reporting accessibility problems with this website

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

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).

Technical information about this website's accessibility

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

This website is fully compliant with the Web Content Accessibility Guidelines (WCAG) version 2.1 AA standard. However, it currently is not fully compliant with the updated WCAG 2.2AA standards.

Elements of the website which fall short of WCAG 2.2AA include:

- Pages which feature read more/click here links
- Images on the website pages that don't have an alternative text option, so the information on them isn't available to people using a screen reader
- Low contrast colours and text on some pages

Todmorden Town Council are committed to achieving full compliance with the new Web Content Accessibility Guidelines Version 2.2AA Standard.

The Council look to achieve this by:

- Auditing the website using software such as the WebAIM system, to identify areas which need to be edited
- Making a clear and proportionate plan to work to, to achieve compliance by 31st March 2027, in advance where practicable
- Ensuring all future additions to the website conform to WCAG 2.2AA

Accessibility statement prepared on 4th February 2026.

Adopted 18th February 2026