

### **Explanation of 'No' to assertion 10**

Coveney Parish Council answered “No” to Assertion 10 in Section 1 of the Annual Governance and Accountability Return (AGAR) because the Council identified that some data protection policies, procedures, and records required under UK GDPR and related governance guidance were not fully in place during the financial year ended 31 March 2026.

During the Council’s review of governance arrangements, it was identified that the Council did not yet have a complete Record of Processing Activities (ROPA), formal Subject Access Request (SAR) procedures and registers, or a documented data breach recording process. In addition, further GDPR training was considered necessary for both the Clerk and councillors to ensure continued compliance and awareness.

In the interests of transparency and proper governance, the Council considered it appropriate to record a “No” response rather than provide assurance that all requirements had been fully met.

The Council is committed to strengthening its governance and data protection arrangements and has agreed the following action plan.

#### **Action Plan**

1. Prepare and adopt a comprehensive Record of Processing Activities (ROPA) covering all Council data processing activities.
2. Establish formal Subject Access Request procedures and maintain a SAR register.
3. Introduce a formal personal data breach procedure and breach recording register.
4. Review and update all GDPR and data protection policies to ensure compliance with current legislation and guidance.
5. Arrange GDPR and data protection training for the Clerk and all councillors.
6. Introduce a regular review schedule for policies, procedures, and compliance records.

The Council expects these actions to be completed during the current financial year and will continue to review and strengthen its governance arrangements accordingly.