

Internal Audit Report for Brundish Parish Council for the period ending 31 March 2024

Clerk	Amanda Austin
RFO (if different)	Carl King
Chairperson	Neil Parsons
Precept	£4,259.00
Income	£13,263.56
Expenditure	£13,977.19
General reserves	£4,317.61
Earmarked reserves	£9,659.58
Audit type	Annual
Auditor name	Julie Lawes

Introduction

The primary objective of internal audit is to review, appraise and report upon the adequacy of internal control systems operating throughout the council. To achieve this SALC adopt a predominantly systems-based approach to audit.

The council's internal control system comprises the whole network of systems established within the council to provide reasonable assurance that the council's objectives will be achieved, with reference to:

- the effectiveness of operations
- the economic and efficient use of resources
- compliance with applicable policies, procedures, laws, and regulations
- the safeguarding of assets and interests from losses of all kinds, including those arising from fraud, irregularity, and corruption

- the integrity and reliability of information, accounts, and data

Methodology

When conducting the audit, the internal auditor may:

- conduct a selective assessment of compliance with relevant procedures and controls expected to be in operation during the financial year in order to be able to complete the Annual Internal Audit Report 2023/24 of the Annual Governance and Accountability Return (AGAR)
- review the reliability and integrity of financial information and the means used to identify, measure, classify and report such information
- review the means of safeguarding assets and, as appropriate, verify the existence of such assets
- appraise the economy and efficiency with which resources are employed, identify opportunities to improve performance and recommend solutions to problems
- review the established systems to ensure compliance with those policies, procedures, laws, and regulations which could have a significant impact on operations, and determine whether the council complies
- review the operations and activities to ascertain whether results are consistent with objectives and whether they are being conducted as planned

Section 1 – proper bookkeeping		
The internal auditor will look at the methods and processes used to manage the council’s accounts and in particular that it provides clear data for reporting and monitoring purposes. This includes checking information is accurate, kept up to date, referenced and verified.		
Evidence		<i>Internal auditor commentary</i>
<i>Is the ledger maintained and up to date?</i>	YES	The council uses an excel spreadsheet to form the basis of its accounts. All transactions are well referenced and provide an effective tool for the basis of the council’s internal controls.
<i>Is the ledger on the correct basis in relation to the gross income/expenditure?</i> (under Proper Practices, Councils are required to work on an Income & Expenditure basis when their gross income, or gross expenditure, exceeds £200,000 for 3 consecutive years)	YES	Accounts are conducted on a receipts and payments basis.
<i>Is the cash book up to date and regularly verified?</i>	YES	This provides good evidence to support the council’s underlying statements.
<i>Is the arithmetic correct?</i>	YES	A number of spot checks were carried out and the functionality of the cashbook was found to be in order. COMMENT: Council has incorrectly included four payments from 2024/2025 within its accounting records. £72.00; £1,566.72; £9.98; £148.50 – all dated 2 nd April 2024. This has resulted in an incorrect year end figure being stated for expenditure of £13,977.19 The correct balance should be recorded as £15,774.39.
Additional comments:		
Section 2 – Financial Regulation and Standing Orders		

The internal auditor will check the date the Council conducted its annual review of both Standing Orders and Financial Regulations and in particular check if these are based on NALC'S latest model which include legislative changes.		
Evidence		Internal auditor commentary
Have Standing Orders been adopted, up to date and reviewed annually?	YES	<p>The Standing Orders, as seen on the Parish Council's website, were reviewed at a meeting held 20th March 2024.</p> <p>Council's Standing Orders, are based on the latest model published by the National Association of Local Councils (2018) and contain the provisions of the Model Councillor Code of Conduct as adopted by the Council. The Standing Orders are compliant with legislation and have been adapted (where they are not statutory requirements) to ensure that they are relevant to the Parish Council.</p> <p>RECOMMENDATION: At the next annual review, Council might wish to also review the Procurement Thresholds amendments (SI 2022/139) of the Public Contracts (Amendment) Regulations 2022 which came into force on 21st December 2022 and make the changes to the contract value limits from £25,000 to £30,000 for non-central government authorities. The contract value limits are to be calculated inclusive of VAT (effective from 1st January 2022).</p>
Are Financial Regulations up to date and reviewed annually?	YES	<p>Financial Regulations, as seen on the Council's website, were reviewed at a meeting held 20th March 2024.</p> <p>Financial Regulations are based on the NALC Model Financial Regulations 2019 with provisions included as outlined under LTN 87 - Procurement – March 2022.</p> <p>RECOMMENDATION: NALC has released new Financial Regulations for 2024 which council should look to adopt at its next review.</p>
Has the Council properly tailored the Financial Regulations?	YES	The Council's Financial Regulations have been tailored to the Parish Council.
Has the Council appointed a Responsible Financial Officer (RFO)? ¹	YES	In accordance with Section 151 of the Local Government Act 1972(d) (financial administration), the Council has appointed a person (the Vice-

¹ Section 151 Local Government Act 1972 (d)

		Chairman) to be responsible for the administration of the financial affairs of the relevant authority as confirmed in Section 1.8 of the Financial Regulations.
<i>Additional comments:</i>		

Section 3 – Payment controls		
<p>The internal auditor will specifically check bank reconciliation including credit/debit cards and management approval processes and evidence that internal Financial Regulations (FO) are being followed. The internal auditor will examine how regular payments are managed and specifically seek evidence that these have been brought back to the Council for verification purposes especially where the actual payment made differs from the amount previously agreed. VAT should be clearly identified including evidence that claims have been correctly managed. The internal auditor will check if the Council has a clear understanding on eligibility in relation to the General Power of Competence and that s.137 has been correctly applied and managed.</p>		
Evidence		<i>Internal auditor commentary</i>
Is there supporting paperwork for payments with appropriate authorisation?	YES	A selection of random payments were cross checked against the cash book, bank statement and invoices and all were found to be authorised in accordance with Proper Practices.
Where applicable, are internet banking transactions properly recorded and approved?	YES	Internet banking is operated in accordance with the Council's own Financial Risk Assessment and is used for the settlement of the Council's expenditure.
Is VAT correctly identified, recorded, and claimed within time limits?	YES	VAT income of £568.76 was recorded as received 27 th April 2023 within the minutes of the council meeting held 24 th May 2023. VAT is clearly recorded in the cashbook, detailing a year end figure for the period under review of £1,970.58.
Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ²	N/A	Council has not adopted the General Power of Competence.
Are payments under s.137 ³ separately recorded, minuted and is there evidence of direct benefit to electorate?	Partly Met	Council recorded making payments under s137 powers in donations equalling a total value of £300 but has recorded these under the description of 'other'.

² Localism Act

³ Section 137 of the Local Government Act 1972 ("the 1972 Act") enables local councils to spend a limited amount of money for purposes for which they have no other specific statutory expenditure. The basic power is for a local council to spend money (subject to the statutory limit – of £9.93 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

		RECOMMENDATION: It is recommended council clearly identify these payments under the correct description of s137 enabling council to budget appropriately and ensure they are within the statutory expenditure limits.
Where applicable, are payments of interest and principal sums in respect of loans paid in accordance with agreements?	N/A	Council has no loans
Additional comments:		

Section 4 – Risk management		
The internal auditor will expect to find evidence of the management of risks from identification of what those are for each individual Council through to how these will be managed and the controls in place to mitigate these and that these have been approved by the Council.		
Evidence		Internal auditor commentary
<i>Is there evidence of risk assessment documentation?</i>	YES	The Financial Risk & Management Assessment documentation as reviewed provides details of the risks associated with the functioning of a smaller authority and the measures that the Council will undertake to mitigate such risks. The Risk Register for the year under review was considered and adopted by full Council at its meeting of 20 th March 2023.
<i>Is there evidence that risks are being identified and managed?</i>	YES	Council has evidenced that it has taken steps to identify and manage financial risks.
<i>Does the Council have appropriate and adequate insurance cover in place for employment, public liability and fidelity guarantee and has been reviewed on an annual basis?</i>	YES	Council has insurance in place under a specialist policy for local councils with Hiscox Insurance which shows core cover for the following: Public/Products Liability £10m; Employers Liability £10m and Fidelity Guarantee of £150k.

<i>Evidence that internal controls are documented and regularly reviewed⁴</i>	YES	Council reviewed its statement of internal controls as documented on the website dated 20 th March 2024.
<i>Evidence that a review of the effectiveness of internal audit was conducted during the year, including consideration of the independence and competence of the internal auditor prior to their appointment⁵</i>	YES	Council reviewed the scope and effectiveness of its internal audit arrangements within its statement of internal controls.
Additional comments:		

⁴ Accounts and Audit Regulations

⁵ Practitioners Guide

Section 5 – Budgetary controls		
The internal auditor will seek verification that budgets are properly prepared, agreed and monitored. In particular they will look for evidence of good practice in that the key stages of the budgetary process have been followed		
Evidence		Internal auditor commentary
<i>Verify that budget has been properly prepared and agreed</i>	YES	The budget for the year 2023/2024 was approved at the Council meeting of 7 th December 2022. COMMENT: It is noted within its minutes, that council set its precept before agreeing its budget for 2023/2024 at which an additional £500 was requested to be added. Council should approve its budget prior to setting the precept to ensure an adequate amount is approved.
<i>Verify that the precept amount has been agreed in full Council and clearly minuted</i>	YES	The precept was set at £4,259 for 2023/2024, as confirmed at the above meeting, with the paperwork demonstrating that this was a 3% increase over that set the previous year. RECOMMENDATION: Council should record within the minutes the value of the precept being set. As detailed above, the budget should be agreed prior to the precept being set.
<i>Regular reporting of expenditure and variances from budget</i>	YES	Council notes regular reviews of the budget against expenditure and income.
<i>Reserves held – general and earmarked⁶</i>	YES	The Council, as at year-end, had General Reserves of £4,317.61 and Earmarked Reserves of £9,659.58.
Additional comments:		

⁶ In accordance with proper practices, the generally accepted minimum level of a Smaller Authority’s General Reserve is that this should be maintained at between three (3) and twelve (12) months of Net Revenue Expenditure

Section 6 – income controls		
The internal auditor will seek evidence to ensure income is correct managed – recorded, banked, and reported and test mechanisms used to achieve this.		
Evidence		Internal auditor commentary
<i>Is income properly recorded and promptly banked?</i>	YES	Income is recorded in accordance with Council's Financial Regulations.
<i>Is income reported to full council?</i>	YES	In accordance with the Council's Standing Orders, income received is reported to full Council.
<i>Does the precept recorded agree to the Council Tax Authority's notification?</i>	YES	Council received precept in the sum of £4,259 from Mid-Suffolk District Council. Evidence was provided showing a full audit trail from Precept being discussed and approved to being served on the Charging Authority to remittance advice showing the Precept to be paid and receipt of same in the Council's Bank Account.
<i>If appropriate, are CIL reporting schedules in accordance with the Regulations?⁷</i>	YES	Council reported the following:
<i>Is CIL income reported to the council?</i>	YES	£4,189.93 Starting Balance £8,345.80 Income £7,933.33 Expenditure £4,602.40 End balance
<i>Does unspent CIL income form part of earmarked reserves?</i>	YES	CIL income is reported to council and recorded within the council minutes. The income forms part of the earmarked reserves.
<i>Has an annual report been produced?</i>	YES	The report has been produced and was published on the council website.

⁷ Community Infrastructure Levy Regulations 2010

<i>Has it been published on the authority's website?</i>	YES	
<i>Additional comments:</i>		

Section 7 – petty cash		
The Internal Auditor will seek evidence that the Council has followed its own policies, procedures, and verification processes and that these are up to date.		
Evidence		Internal auditor commentary
<i>Is petty cash in operation?</i>	N/A	Council does not operate a petty cash system.
<i>If appropriate, is there an adequate control system in place?</i>	N/A	
Additional comments:		

Section 8 – Payroll controls		
The Internal Auditor will check salaries were approved in accordance with PAYE, NI, Pension and that there is a clear understanding that the clerk is not self-employed. The Internal Auditor will also review how payroll is managed including evidence of approval of payslips.		
Evidence		Internal auditor commentary
<i>Do all employees have contracts of employment?</i>	YES	Council had 1 employee on its payroll at the period end of 31 st March 2024. Employment contracts were not reviewed during the internal audit but the Clerk to the Council has confirmed that a Contract of Employment is in place.
<i>Has the Council approved salary paid?</i>	YES	All salary payments are presented to the Council for approval and payments made in accordance with Council's own Financial Regulations. No employee is paid the national minimum wage.
<i>Minimum wage paid?</i>	N/A	
<i>Are arrangements in place for authorising of the payroll and payments to the council? Does this include a verification process for agreeing rates of pay to be applied?</i>	YES	The payroll function is operated in accordance with HM Revenue and Customs guidelines. There are suitable payroll arrangements in place which ensures the accuracy and legitimacy of payments of salaries and wages, and associated liabilities and as such the Council has complied with its duties under employment legislation.
<i>Do salary payments include deductions for PAYE/NIC? Is PAYE/NIC paid promptly to HMRC?</i>	YES	The payroll function for the year under review is operated in accordance with HM Revenue and Customs guidelines and outsourced to Suffolk Association of Local Councils. Cross-checks were completed on three payments and found to be in order.

<i>Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation?⁸</i>	YES	In the previous internal audit review, it was noted the last re-declaration to the Pension Regulator was completed December 2021. COMMENT: A re-declaration is to be made every three years, so will be due to be carried out December 2024.
<i>Have pension re-declaration duties been carried out</i>	YES	As above
<i>Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?</i>	YES	There is a satisfactory expense system in place and all staff expenses claimed are approved in accordance with Council's Financial Regulations.
Additional comments:		

⁸ The Pension Regulator – [website click here](#)

Section 9 – Asset control		
The Internal Audit will be seeking to establish if there is a list of assets in accordance with proper practices including the date of acquisition, location, and value. This extends to checking policies (with evidence of review) and that the Council has applied the documented approach in practice. The Internal Auditor will check not only valuation processes but the existence of reserve budgets for depreciation and adequacy of insurance. A clear audit trail should be available when items are purchased including minutes to evidence approval.		
Evidence		Internal auditor commentary
<i>Does the Council maintain a register of material assets it owns and manage this in accordance with proper practices?⁹</i>	YES	The Asset Register reflects those items listed under insurance and within the Parish Council's remit for maintenance and ownership. It is noted that the declared value for all assets at year-end is £12,423. The value of assets is included in the Asset Register. No records of deeds, articles, land registry title number documents were viewed at the time of audit.
<i>Is the value of the assets included? (Note value for insurance purposes may differ)</i>	YES	
<i>Are records of deeds, articles, land registry title number available?</i>	N/A	
<i>Are copies of licences or leases available for assets sited at third party property?</i>	N/A	The council did not advise of any assets sited at third party locations with leases or licences.
<i>Is the asset register up to date and reviewed annually?</i>	YES	The Asset Register details annual reviews. COMMENT: It is noted the Asset Register documenting the year end figure for 2023/2024 is yet to be signed off by council within its meeting.

⁹ Practitioners Guide

<i>Cross checking of insurance cover</i>	YES	Council has adequate cover. COMMENT: Council should document that at renewal / annually, the insurance covers all assets under the council remit.
<i>Additional comments:</i>		

Section 10 – bank reconciliation		
The internal auditor will seek to establish that the Council understands and can evidence good practice and internal control mechanisms in relation to bank reconciliation.		
Evidence		Internal auditor commentary
<i>Is bank reconciliation regularly completed and reconciled with the cash book and cover every account?</i>	YES	Bank reconciliations are completed on a regular basis and reconcile with the cash sheets.
<i>Do bank balances agree with bank statements?</i>	YES	Bank balances agree with period end statements and, as at year end 31 st March 2024 the balance across the council's accounts stood at £15,774.39. RECOMMENDATION: Council has included 4 payments from the accounting period 2024/2025 within its Annual Return figure.
<i>Is there regular reporting of bank balances at Council meetings?</i>	YES	Balances across the Council's accounts are reported at each meeting of council.

Section 11 – year end procedures		
Evidence		<i>Internal auditor commentary</i>
<i>Are appropriate accounting procedures used?</i>	YES	Accounts are produced on a receipts and payments basis and all found to be in order.
<i>Financial trail from records to presented accounts</i>	YES	There is a full audit trail from records to presented accounts.
<i>Has the appropriate end of year AGAR¹⁰ documents been completed?</i>	YES	As Council is a smaller authority with gross income and expenditure not exceeding £25,000 it has completed Form 2 of the AGAR. COMMENT: The AGAR recommends that council ‘should’ receive the Internal Report prior to signing off councils’ statement and accounts.
<i>Did the Council meet the exemption criteria and correctly declared itself exempt?</i>	YES	As the Council was a smaller authority with a gross income and expenditure not exceeding £25,000 for the period under review, it was able to certify itself as an exempt authority which was confirmed at a meeting of the Council 24 th May 2023.
<i>During the period in question did the small authority demonstrate that it correctly provided for the exercise of public right as required by the Accounts and Audit Regulations 2015?</i>	Partly Met	During the review of the publication requirements of the Accounts and Audit Regulations 2015, it is noted that, for the year 2022-2023, the RFO had set the dates for the inspection of the Council’s accounts and associated documents as 25 th May 2023 to 17 th July 2023 with the date of the notice being 24 th May 2023. COMMENT: The notice as published on the council website details the start date as Thursday 25 th May <u>August</u> 2023 with the end date of Monday 17 th July 2023. It is a requirement that the inspection period must be 30 working days inclusive and must include the first 10 working days of July. The notice details 35 working days (not including bank holidays).

¹⁰ Annual Governance & Accountability Return (AGAR)

<p><i>Have the publication requirements been met in accordance with the Regulations?¹¹</i></p>	<p>YES</p>	<p>The Council has complied with the requirements of the Regulations for smaller authorities with income and expenditure not exceeding £25,000 and published the following on a public website:</p> <ul style="list-style-type: none"> • Certificate of Exemption • Annual Internal Audit Report 2022/23 • Section 1 – Annual Governance Statement 2022/23 • Section 2 – Accounting Statements 2022/23 • Analysis of variances • Bank reconciliation • Notice of the period for the exercise of public rights and other information required by Regulation 15 (2), Accounts and Audit Regulations 2015.
<p><i>Additional comments:</i></p>		

¹¹ Accounts and Audit Regulations 2015

Section 12 – internal audit		
The internal auditor will revisit weaknesses and recommendations previously identified to see if these have been addressed. They will also check if any changes introduced require further verification to ensure effectiveness of the corrective action taken.		
Evidence		<i>Internal auditor commentary</i>
<i>Has the Council considered the previous internal audit report?</i>	YES	Council recorded its receipt at the meeting held 11 th October 2023.
<i>Has appropriate action been taken regarding the recommendations raised?</i>	NO	Council is still to: <ul style="list-style-type: none"> • Record s137 payments within its cashbook • Ensure it sets correct dates for the exercise of public rights • Record the appointment of the internal auditor • Ensure the first item at the Annual Parish Council meeting is the election of Chairman – in accordance with its own Standing Orders
<i>Has the Council confirmed the appointment of an internal auditor?</i>	NO	There is no evidence to record the appointment of the internal auditor.
Additional comments:		

Section 13 – external audit for the period under review		
The internal auditor will revisit the external audit so that previous weaknesses and recommendations can be considered.		
Evidence		<i>Internal auditor commentary</i>
<i>Has the Council considered the previous external audit report?¹²</i>	<i>N/A</i>	Council was exempt from a limited assurance review.
<i>Has appropriate action been taken regarding the comments raised?</i>	<i>N/A</i>	
Additional comments:		

¹² Regulation 20 Accounts and Audit Regulations 2015 – *following completion of an audit the Council should note that it is the Council as a whole (i.e., All members) and not a committee that should receive and consider the audit letter (including Annual Return and Certificate) from the local auditor as soon as reasonably practicable and the minutes should reflect that these have been received.*

Section 14 – additional information		
The internal auditor will look for additional evidence of good record keeping, compliance with data protection regulations, freedom of information and website accessibility regulations.		
Evidence		<i>Internal auditor commentary</i>
<i>Was the annual meeting held in accordance with legislation?</i> ¹³	<i>Partly Met</i>	Council held its Annual Meeting of the Parish Council at which the Chair and other Officers were elected on 24 th May 2023. RECOMMENDATION: The first item on the agenda, before anything else, should be the election of the Chairman in accordance with councils own Standing Orders Section 5.
<i>Is there evidence that Minutes are administered in accordance with legislation?</i> ¹⁴	<i>YES</i>	Council is aware that that under LGA 1972 schedule 12, paragraphs 41(1) and 44 the draft minutes of a meeting should be formally approved (with any necessary amendments) at the next meeting. At each meeting, the Chair is given formal approval to sign the minutes.
<i>Is there a list of members' interests held?</i>	<i>YES</i>	Evidence was seen on the Mid-Suffolk District Council website for the Register of Interests for Parish Councillors.
<i>Does the Council have any Trustee responsibilities and if so, are these clearly identified in a Trust Document?</i>	<i>N/A</i>	Council does not have any Trustee Responsibilities.
<i>Has the Transparency Code been correctly applied, and information published in accordance with current legislation?</i>	<i>YES</i>	To ensure compliance with the requirements of the Transparency Code for smaller authorities (turnover not exceeding £25,000), Council is aware that the following should be published on a public website not later than 1 July: Internal Audit Report List of Councillors and Responsibilities Items of Expenditure Above £100 including recoverable and non-recoverable VAT End of Year Accounts

¹³ The Local Government Act 1972 Schedule 12, paragraph 7 (2) and Schedule 15 (2)

¹⁴ Public Bodies (Admission to Meetings) Act 1960, Local Government Act 1972, and the Localism Act 2011

		Annual Governance Statement Asset Register and that Agendas of Meetings; Associated Papers and Minutes should be published in accordance with the prescribed timescales as set out in the Transparency code for smaller authorities – December 2014.
<i>Has the Council registered with the Information Commissioner's Office (ICO)?¹⁵</i>	YES	The Council is correctly registered with the Information Commissioner's Office (ICO) as a Data Controller in accordance with the Data Protection Legislation. Reference: ZB395917 Expiry: 25 th September 2024
<i>Is the Council compliant with the General Data Protection Regulation requirements?</i>	YES	Council has taken active steps to ensure compliancy with the GDPR requirements and has adopted policies that provides clear responsibilities and obligations of the Council in respect of the collecting, using and protecting of personal information in accordance with the provisions of the GDPR.
<i>Has the Council published a website accessibility statement on their website in line with Regulations?¹⁶</i>	YES	Council has a website accessibility statement detailing the technical information of the website along with the methods used for testing the website; the steps being taken to improve accessibility and how the site is being improved to ensure that content meets the WCAG 2.1 Standard under Regulation 8 of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.
<i>Does the council have official email addresses for correspondence?¹⁷</i>	YES	The clerk to the council has an official email address for correspondence.
<i>Is there evidence that electronic files are backed up?</i>	Not confirmed	Details were not provided of how council backs up its electronic files.
<i>Do terms of reference exist for all committees and is there evidence these are regularly reviewed?</i>	N/A	Council does not operate with a committee system.
Additional comments:		

¹⁵ Data Protection Act 2018

¹⁶ Website Accessibility Regulations 2018

¹⁷ Practitioners Guide

SALC Internal Audit Report template (v.8)
Last reviewed: 24th April 2024

Signed: ***J. Lawes***

Date of Internal Audit Visit: N/A

Date of Internal Audit Report: 12th July 2024

On behalf of Suffolk Association of Local Councils