

Internal Audit Report for Glemsford Parish Council for the year ending 31st March 2021

Clerk	Deborah George
RFO (if different)	
Chairperson	Stephen Plumb
Precept	£99364
Income	£176572
Expenditure	£196507
General reserves	£93281
Earmarked reserves	£86504
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:

- carry out 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 2020/21 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 carried out 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 their accounting system. It provides data for analysis allowing the RFO to produce clear financial management reports detailing receipts and payments and ensures that the financial transactions of the council are accurately recorded.
<i>Is the cash book up to date and regularly verified?</i>	YES	Accounts are listed on a month to month basis which does provide a clear summary of receipts and payments. Comment: To enable a clearer system of analysis and review, it would be more practical for all months to be provided on one spreadsheet with a running total.
<i>Is the arithmetic correct?</i>	YES	Accounting records were spot checked. They are well maintained and clearly identify expenditure and income at any given point.
Additional comments:		

Section 2 – Financial Regulation and Standing Orders		
The internal auditor will check the date the Council carried out 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		<i>Internal auditor commentary</i>
Have Standing Orders been adopted, up to date and reviewed annually?	YES	At a meeting on 10 th November 2020 the council carried out an annual review of its Standing Orders, these are available to view on the council's website and are based on the Model Standing Orders produced by NALC in 2018.
Are Financial Regulations up to date and reviewed annually?	YES	Financial Regulations were reviewed and agreed at a council meeting held 09 th February 2021. These are available to view on the council's website and are based on the NALC Model Financial Regulations 2019.
Has the Council properly tailored the Financial Regulations?	YES	The Financial Regulations have been tailored to the council.
Has the Council appointed a Responsible Financial Officer (RFO)? ¹	YES	At a council meeting held 09 th February 2021 in accordance with Section 151 of the Local Government Act 1972 (D) (Financial Administration), the council appointed the clerk as the Responsible Financial Officer in accordance with the councils adopted Financial Regulations (1.8).
<i>Additional comments:</i>		

¹ Section 151 Local Government Act 1972 (d)

Section 3 – Payment controls		
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.		
Evidence		<i>Internal auditor commentary</i>
Is there supporting paperwork for payments with appropriate authorisation?	YES	A selection of expenditure items was made, and cross checked against the cash book, invoices and bank statements. A list of payments is presented to councillors ensure formal approval of expenditure and this is correctly minuted. This demonstrates good practice in that there are measures in place that help safeguard public money.
Where applicable, are internet banking transactions properly recorded and approved?	YES	There is clear evidence of good practice – payments are approved by two councillors against invoices and identified if online payments or cheque payment and authorisation is then completed demonstrating the council is working in line with its own Financial Regulations. A schedule of both due and retrospective regular payments is submitted to the council for approval at each meeting.
Is VAT correctly identified, recorded and claimed within time limits?	YES	VAT is clearly identified in the end of month accounts and the claim for the period under review in the sum of £3,328.53 dated 15 th December 2020 and £17,798.36 on 12 th February 2021 accurately evidences VAT being correctly claimed within the time limits.
Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ²	N/A	The council is not eligible to use the General Power of Competence

² Localism Act

Are payments under s.137 ³ separately recorded, minuted and is there evidence of direct benefit to electorate?	YES	Payments for the year under review total £1,120 and are in accordance with statutory limits. The council clearly understands s137 and uses the power appropriately.
Where applicable, are payments of interest and principal sums in respect of loans paid in accordance with agreements?	N/A	The council has no such 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 Risk Assessment and Financial Risk Assessment documents were considered for the period under review at the meeting of the council on 9 th March 2021 and covers in general terms the matters which would prevent a smaller relevant body from functioning. The document details high, medium and low risks to the council and shows clear and concise consideration has been taken to enable good decision making.
<i>Is there evidence that risks are being identified and managed?</i>	YES	There is evidence that the council has taken action to identify and assess all risks and has considered what actions or decisions it needs to take during the year in order to avoid any consequences and has multiple risk assessment documents focusing on specific risks.
<i>Does the Council have appropriate and adequate insurance cover in place for employment, public liability</i>	YES	Council has insurance in place with BHIB Limited which shows core cover of the following: Public Liability £10m; Public / Products Liability £10m and Fidelity Guarantee £250k.

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 £8.12 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

<i>and fidelity guarantee and has been reviewed on an annual basis?</i>		<p>The level of Fidelity Guarantee recommended guidelines advises that cover should be at least the sum of the year-end balances plus 50% of the precept / grants.</p> <p>Full council reviewed its adequacy of insurance cover (including fidelity cover) at a meeting held 09th February 2021.</p> <p>A separate Village Hall Policy was reviewed by full council at a meeting held 08th September 2020 which also detailed the following: Public Liability £10m; Public / Products Liability £2.5m/£1m and Fidelity Guarantee £250k.</p>
<i>Evidence that internal controls are documented and regularly reviewed⁴</i>	YES	<p>At a full council meeting on 9th February 2021 it was evidenced that the council reviewed and agreed the Statement of Internal Control in accordance with the Accounts and Audit Regulations 2015. This clearly demonstrates public finances are adequately protected and managed and evidence necessary steps have been taken to mitigate any risks identified. Documentation to support control procedures adopted by the council for payments helps protect the RFO and fulfils an internal control objective.</p>
<i>Evidence that a review of the effectiveness of internal audit has been carried out during the year⁵</i>	YES	<p>The effectiveness of internal audit was agreed at a meeting on 12th January 2021. By reviewing the terms of reference and effectiveness for internal audit the council has followed guidance and demonstrates that it recognises that the function of the internal audit is to test and report to the authority on whether its system of internal control is adequate as required within the Governance and Accountability Guide.</p>
<p>Additional comments: In accordance with proper practices the council has demonstrated it has taken steps to manage key risks in a way it can justify to a level which is tolerable by transferring the risks and taking out insurance.</p>		

⁴ Accounts and Audit Regulations

⁵ Governance and Accountability 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 2020/2021 was approved by full council at a meeting on 12 th November 2019 following a meeting of the Finance Working Group on 05 th November 2019
<i>Verify that the precept amount has been agreed in full Council and clearly minuted</i>	YES	The precept was set at £97,512 and formally approved at a meeting of full council on 12 th November 2019.
<i>Regular reporting of expenditure and variances from budget</i>	YES	In accordance with the Internal Control statement and the councils own Standing Orders the council receives a monthly updated expenditure report alongside bank statements detailing spend versus budget.
<i>Reserves held – general and earmarked⁶</i>	YES	The councils final accounts show general reserves in the sum of £93,281 with earmarked reserves in the sum of £96,504. Proper practice states that it is regarded as acceptable for a councils general (non-earmarked revenue) reserves to be equal to 3 to 12 months of net revenue expenditure. There is no upper limit for earmarked reserves, but they should be held for genuine and intended purposes and their level subject to regular review and justification (at least annually). This was reviewed by the Finance Working Group at a meeting held on 5 th January 2021 where it was recommended future additional costs in relation to the proposed village hall extension be taken from general reserves, these proposed amounts should be allocated under earmarked reserves. Comment: General Reserves are currently higher than that which is advised. Council should note guidance as issued under the Practitioners Guide which states that an authority needs to have regards to the need to

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

	put in place a General Reserve Policy and review the level and purpose of all general and earmarked reserves at least annually.
<i>Additional comments:</i> Budget: The council shows good practice by following the recommended key stages as to the budgetary process to be followed for the year.	

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 Several items were cross checked against the cash book and bank statement and found to be in order. In accordance with proper practices the Responsible Financial Officer ensures that accounting records contain day to day entries of all sums of money and that income received is properly accounted for.
<i>Is income reported to full council?</i>	YES Income received is reported to full council within the end of month accounts spreadsheet and the Finance Reports. Comment: For transparency and a clear record of income the council should record income alongside the expenditure within their minutes.
<i>Does the precept recorded agree to the Council Tax Authority's notification?</i>	YES The council received a precept of £97,512 during the year under review in April and September.
<i>If appropriate, are CIL reporting schedules in accordance with the Regulations?⁷</i>	YES CIL funds for the year under review show a published Expenditure Report for 2019/2020 with an overall balance of £18,814.37 which was published on the council's website.
<i>Is CIL income reported to the council?</i>	YES Funds received in the year under review included a payment in April 2020 of £244.28 and October 2020 £3,158.28.
<i>Does unspent CIL income form part of earmarked reserves?</i>	YES CIL income is detailed within the end of month accounts and Finance Reports which are viewed by council.
<i>Has an annual report been produced?</i>	YES In accordance with the Regulations the proportion of CIL funds received have been specifically allocated within the earmarked reserves. Council has complied with its duty to produce an annual report that details the amount of CIL funds received and spent. The annual report for the year ending 31 st March 2020 showing income received and retained balances was verified by the internal auditor and the council understands that it
<i>Has it been published on the authority's website?</i>	YES

⁷ Community Infrastructure Levy Regulations 2010

		should comply with its duty to upload the annual report onto its website by 31 st December.
Additional comments:		

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	The 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		
<p>The Internal Auditor will check salaries are approved in accordance with PAYE, NI, Pension and that there is a clear understanding that the clerk is not self-employed. If the Clerk was recruited after 1st April 201, evidence will be required to show compliance with the new requirements for the statement of employment, Induction, probation periods and training requirements. The Internal Auditor will also review how payroll is managed including evidence of approval of payslips.</p>		
Evidence		Internal auditor commentary
<i>Do all employees have contracts of employment?</i>	N/A	Employment contracts were not reviewed during the internal audit. In accordance with Proper Practices, the council has ensured that the remuneration payable to all employees has been approved in advance by the council.
<i>Has the Council approved salary paid?</i>	YES	
<i>Minimum wage paid?</i>	NO	
<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 & 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	In accordance with proper practices, PAYE taxes and employee and employer National Insurance contributions (NIC) are calculated and recorded. Deductions are paid to HM Revenue and Customs.
<i>Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation?⁸</i>	YES	Council is aware of its responsibilities under the legislation for workplace pensions. It was reported at the previous audit that all staff are enrolled in the LGPS scheme and there is evidence to support this.
<i>Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?</i>	YES	Any additional costs / expenses incurred by the clerk are reported to full council.
<p>Additional comments: Council should note the changes in the Practitioners Guide for 2020 on the treatment of what can be included as employment expenses within the Annual Governance and Accountability Guide 2020. If applicable, any working from home payments are not to be included within Staff Costs and should be allocated within All Other Payments on the AGAR.</p>		

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 lists items under insurance that fall within the councils remit for maintenance and ownership. It is noted the declared value for all assets at year end (31 st March 2021) is £886,282 and is correctly entered in Section 2, Box 9 of the 2020/2021 AGAR.
<i>Are 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>	NO	
<i>Is the asset register up to date and reviewed annually?</i>	YES	The Asset Register was reviewed and signed off by the council at its meeting on 9 th February 2021 confirming it covers assets within the ownership or responsibility of the council.
<i>Cross checking of insurance cover</i>	YES	The Asset List and adequacy of insurance cover was agreed by full council at a meeting held 09 th February 2021.
Additional comments: Council should be mindful of the guidance in Governance and Accountability for Smaller Authorities for England (March 2019) regarding valuation of assets and ensured that where the acquisition value of the asset at the time of first recording is used, that method of valuation has been applied consistently and if / where amended it will need to publish and provide explanations in changes in value to any previously recorded assets.		

⁹ Governance and Accountability for Smaller Authorities in England – March 2019

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 monthly basis and reconcile with the cash sheets. There are consistent monthly reports of bank balances within the detailed financial reports submitted to councillors for each meeting.
<i>Do bank balances agree with bank statements?</i>	YES	Bank balances agree with the period end statements and, as at year end (31 st March) for the period under review the balance across the council's accounts stood at £255,013.43 which agreed with the figure detailed in Section 2 Box 7 of the AGAR.
<i>Is there regular reporting of bank balances at Council meetings?</i>	YES	Financial reports are submitted to council monthly. The council is aware that in accordance with proper practices, the bank reconciliation is a key tool or management as it assists with the regular monitoring of cash flows and therefore aids decision making. Comment: Whilst there is clear evidence to the internal auditor that regular bank reconciliations are being carried out this should be recorded in the minutes to demonstrate the council is working in accordance with proper practices.

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 expenditure basis and all are found to be in order.
<i>Financial trail from records to presented accounts</i>	YES	The end of year accounts and supporting documentation were well presented for the internal auditor to review.
<i>Has the appropriate end of year AGAR¹⁰ documents been completed?</i>	YES	Section 1 The Annual Governance Statement and Section 2 The Accounting Statement have been completed.
<i>Did the Council meet the exemption criteria and correctly declared itself exempt?</i>	N/A	
<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>	NO	The internal auditor was able to find details of the arrangements for the Exercise of Public Rights for the period under review on the public website used by the council. Comment: It was noted by the External Auditor that the smaller authority did not comply with Regulation 15 of the Accounts and Audit Regulations 2015 as amended by SI 2020/404 the Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 as it failed to make proper provision during the year 2020/21 for the exercise of public rights, since the period for the exercise of public rights was less than 30 consecutive working days in length. As a result, the smaller authority must answer ‘No’ to Assertion 4 of the Annual Governance Statement for 2020/21 and ensure that it makes proper provision for the exercise of public rights during 2021/22.
<i>Have the publication requirements been met in accordance with the Regulations?¹¹</i>	YES	The council has complied with the requirements of the Accounts and Audit Regulations 2015 for smaller authorities with an income and expenditure

¹⁰ Annual Governance & Accountability Return (AGAR)

¹¹ Accounts and Audit Regulations 2015

	exceeding £25,000 but not exceeding £6.5 million for the year ending 31 st March 2020 and published the following on their public website: Section 1 – Annual Governance Statement of the AGAR Section 2 – Annual Accounting Statements of the AGAR Section 3 – External Audit Report and Certificate (<i>Accounts and Audit Regulations 2015</i>)
Additional comments:	

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 previous internal audit report been considered by the Council?</i>	YES	The Internal Audit was discussed by full council at a meeting held 14 th July 2020.
<i>Has appropriate action been taken regarding the recommendations raised?</i>	YES	Appropriate action has been taken throughout the year for the items raised in the previous internal audit.
<i>Has the Council confirmed the appointment of an internal auditor?</i>	YES	SALC was appointed to act as the council's internal auditor at a meeting of the council on 13 th October 2020 for the period under review.
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 taken into account.		
Evidence		<i>Internal auditor commentary</i>
<i>Has the previous external audit report been considered by the Council?</i> ¹²	YES	The Limited Assurance Review for the period ending 31 st March 2020 was presented to full council at its meeting on 09 th February 2021. Council resolved to agree the External Audit report in accordance with Regulation 20 Accounts and Audit Regulations 2015.
<i>Has appropriate action been taken regarding the comments raised?</i>	YES	The External Audit report detailed that the smaller authority did not comply with Regulation 15 of the Accounts and Audit Regulations 2015 as it failed to make proper provision during the year 2020/21 for the exercise of public rights, since the period for the exercise of public rights was less than 30 consecutive working days. The Annual Governance Statement for 2020/21 has been completed accordingly answering ‘No’ to Assertion 4. There were no other matters raised.
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 (ie. 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 some 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>(note to auditor- emergency Regulations as a result of the COVID-19 pandemic)</i> ^{f14}	N/A	For the period in question, as a result of the COVID-19 pandemic the council chose not to hold an Annual Meeting of the Parish Council.
<i>Is there evidence that Minutes are administered in accordance with legislation?</i> ¹⁵	N/A	Not seen as virtual audit so unable to confirm that the minutes are signed and dated on approval. Full council minutes available on the council’s website clearly document the minutes and the approval of the previous month’s minutes.
<i>Is there a list of members’ interests held?</i>	YES	Evidence was seen on the Babergh District Council website of the Register of Interests for current Parish Councillors. Comment: Council is reminded that whilst the Monitoring Officer of the council must arrange for the Parish Councils Register of Members Interests to be available for inspection on the BDC website, where the Parish Council has its own website, its Register of Members Interests must also be published on that site. (Openness and Transparency on personal interests – A guide for councillors – August 2012)
<i>Does the Council have any Trustee responsibilities and if so are these clearly identified in a Trust Document?</i>	N/A	
<i>Has the Transparency Code been correctly applied and information published in accordance with current legislation?</i>	YES	Councils with income over £25,000 but under £200,000 will be expected (but are not legally required to do so) to follow the Local Government Transparency Code 2015.

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

¹⁴ The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020

¹⁵ Public Bodies (Admission to Meetings) Act 1960, Local Government Act 1972 and the Localism Act 2011

<i>Has the Council registered with the Information Commissioner's Office (ICO)?¹⁶</i>	YES	The council is correctly registered with the IO as a Data Controller in accordance with legislation. Reference: ZA072956 Expiry Date: 28 th August 2021
<i>Is the Council compliant with the General Data Protection Regulation requirements?</i>	YES	The council has taken steps to ensure compliancy. Documents detailed on the council's website. These are reviewed and amended as necessary on an annual basis, most recently agreed by full council at a meeting held 09 th March 2021.
<i>Has the Council published a website accessibility statement on their website in line with Regulations?¹⁷</i>	NO	A Website Accessibility Statement has not been published on the website.
<i>Is there evidence that electronic files are backed up?</i>	N/A	Not seen as virtual audit
Additional comments:		

Signed: J. Lawes

Date of Internal Audit Visit:

Date of Internal Audit Report: 21/05/2021

On behalf of Suffolk Association of Local Councils

¹⁶ Data Protection Act 2018

¹⁷ Website Accessibility Regulations 2018