Internal Audit Report for Palgrave Parish Council for the year ending 31st March 2022

Clerk	Caroline Emeny
RFO (if different)	As above
Chairperson	Mr N Weston
Precept	£16,000.00
Income	£34,602.26
Expenditure	£21,121.59
General reserves	£17,013.88
Earmarked reserves	£40,876.35
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

Last reviewed: 7th April 2022

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 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 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		Internal auditor commentary		
Is the ledger maintained and up to date? YES		The council uses a computerised basis to form their accounting system detailing receipts and payments ensuring that the financial transactions of the Parish Council are accurately recorded.		
verified?		The cash book provides good evidence to support the council's underlying statements. Regular reports are generated and circulated to councillors detailing expenditure and income and the accounts reconciled to the bank statements showing good internal control.		
Is the arithmetic correct?	YES	The accounts were spot checked and were all found to be correct.		

Additional comments: For further transparency and scrutiny, the RFO, in accordance with best practice, has referenced all payments and receipts with a description as to the expenditure and income being incurred to ensure the integrity of data being input and processed.

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	At a meeting on 10 th June 2021 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 which take into account changes in legislation from those produced in 2013
Are Financial Regulations up to date and reviewed annually?	YES	Financial Regulations were reviewed and agreed at a council meeting held 10 th June 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	In accordance with Section 151 of the Local Government Act 1972(d) (financial administration), at a meeting held 10 th June 2021, the council approved the clerk to be the Responsible Financial Officer as per the council's own Financial Regulations (1.8) which state that the Clerk is the RFO.

Additional comments: In accordance with proper practices, council has ensured that its Standing Orders and Financial Regulations are regularly reviewed and fit for purpose.

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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		Internal auditor commentary
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. A schedule of regular payments was approved at a meeting held 5 th May 2021. 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	The RFO issues a list of the payments to be made which is detailed within the minutes with two councillors signing the schedule of payments as authorisation. An Internet Banking Statement was approved by full council at a meeting held 10 th June 2021.
Is VAT correctly identified, recorded, and claimed within time limits?	YES	VAT is clearly identified in the cash book with a claim of £1,057.14 received 11 th October 2021. The year-end total 31 st March 2022 recorded in the final accounts totals £1,499.94.
Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ²	N/A	The council has not adopted 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	In the final accounts it is detailed the allocation for s137 payments is £8.41 per elector which is 751 giving a total allowance of £6,315.91 with a total amount of £350.00 presented within the 2021/2022 accounts.
Where applicable, are payments of interest and	N/A	The council has no loans.
principal sums in respect of loans paid in accordance		
with agreements?		
Additional comments: In accordance with Financial Regulations F.G. council has ancured that having received the schedule of annual due		

Additional comments: In accordance with Financial Regulations 5.6, council has ensured that having received the schedule of annual due payments which arise on a regular basis, a list of such payments incurred is approved by full council.

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
Is there evidence of risk assessment documentation?	YES	The Risk Assessment document was approved at the meeting of the council held 14 th April 2022 and prior to that 11 th March 2021. Comment: The Risk Assessment document falls slightly outside of the year under review, but it is clear the council is normally very diligent in maintaining their records.
Is there evidence that risks are being identified and managed?	YES	The council has taken steps to identify, assess and record the risks associated with its actions and decisions that could have financial or reputational consequences.
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?	YES	Council has insurance in place under a Came & Company Policy which shows core cover for the following: Public/Products Liability: £10m; Business Interruption £10k; Employers Liability £10m; Fidelity Guarantee £150k.

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 £8.41 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

Evidence that internal controls are documented and regularly reviewed ⁴	YES	At a meeting held 10 th June 2021 council recorded that other quotes had been received but it had been agreed to remain with their current insurers securing a new 3 year deal. The level of Fidelity Guarantee meets the recommended guidelines which provides that the cover should be at least the sum of the year-end balances plus 50% of the precept/grants. At a full council meeting on 14 th April 2022, and prior to that 11 th March 2021, it was evidenced that the council reviewed the Internal Control Check and Statement of Internal Control in accordance with the Accounts and Audit Regulations 2015. This was were approved and signed off by the Chairman and the Clerk. 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. These are published on the council's website. Comment: The Internal Control document falls slightly outside of the year under review, but it is clear the council is normally very diligent in maintaining their records.
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 appointment ⁵	YES	The effectiveness of the internal audit was covered by full Council within the Internal Control documents at a meeting held 14 th April 2022 and prior to that 11 th March 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 internal audit is to test and report to the authority on whether its system of internal control is adequate. Comment: The effectiveness of the internal audit review falls slightly outside of the year under review, but it is clear the council is normally very diligent in maintaining their records.

⁴ Accounts and Audit Regulations ⁵ Practitioners Guide

Additional comments:

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
Verify that budget has been properly prepared and agreed	YES	The budget for 2021/2022 was agreed and set at a meeting of full council on 14 th January 2021 with an expected expenditure of £19,825.00 and income of £17,684.00
Verify that the precept amount has been agreed in full Council and clearly minuted	YES	The precept for 2021/2022 was set at £16,000 and formally approved at a meeting of full council on 14th January 2021.
Regular reporting of expenditure and variances from budget	YES	Reporting of expenditure v budget is conducted on a regular basis.
Reserves held – general and earmarked ⁶	YES	The councils accounts show a general reserve of £17,013.88 and an earmarked reserve of £40,876.35. Council should be aware of the guidance as issued by Proper Practices which states that it is regarded as acceptable for a council's general (non-earmarked revenue) reserves to be equal to 3 to 12 months of Net Revenue Expenditure and should ensure that the level of general reserves adopted is in accordance with its General Reserve Policy. 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).

Additional comments: Budget: Council shows good practice by following the recommended key stages as to the budgetary process to be followed for the year:

- decide the form and level of detail of the budget;
- review the current year budget and spending;
- determine the cost of spending plans; assess levels of income;
- bring together spending and income plans;
- provide for contingencies and consider the need for reserves;

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

- approve the budget;
 confirm the precept or rates and special levies; and
 review progress against the budget regularly throughout 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			
Is income properly recorded and promptly banked?	YES	Income is recorded in accordance with Council's Financial Regulations. A number of income items were cross checked against the cash book and bank statements and found to be in order.			
Is income reported to full council?	YES	Income is reported to full council and recorded within the minutes.			
Does the precept recorded agree to the Council Tax Authority's notification?	YES	The receipt of the precept to the value of £16,000 was recorded in two separate payments in April and September with the additional grant of £284.00 received in April 2021.			
If appropriate, are CIL reporting schedules in Accordance with the Regulations?		The council received two CIL payments throughout the financial year, £11,092.87 4th May 2021 and £5,460.04 14th October 2021 with expenditure of £2,310.00 leaving a remaining balance of £35,876.35 in accordance with the report approved by full council at a meeting held 14th April 2022.			
			Has an annual report been produced?	YES	
			Has it been published on the authority's website?	YES	

Additional comments: CIL Reporting: Council is aware of the requirement to ensure that it complies with its duty to produce an annual CIL report for each financial year and that such a report is uploaded onto its website.

⁷ Community Infrastructure Levy Regulations 2010

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
Is petty cash in operation?	N/A	The council does not operate a petty cash system.
If appropriate, is there an adequate control system in place?		

Additional comments:

Last reviewed: 7th April 2022

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. 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.

Evidence		Internal auditor commentary
Do all employees have contracts of employment?	N/A	Employment contracts were not reviewed during the internal audit which was carried out remotely.
Has the Council approved salary paid?	YES	Minutes evidence the approval of the clerk's salary and the increase in the
Minimum wage paid?	NO	SCP pay scales.
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?	YES	The payroll function is operated in accordance with HM Revenue and Custom 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 legislation.
Do salary payments include deductions for PAYE/NIC? Is PAYE/NIC paid promptly to HMRC?	YES	The payroll function for the year under review is operated in accordance with HM Revenue and Customs guidelines. Deductions paid to HM Revenue and Customs during the year under review were made in accordance with timescales as set out in the regulations
Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation? ⁸	YES	Council completed its re-declaration of compliance 1 st July 2019. Comment: This is to be completed on a three year basis, with the next redeclaration due 1 st July 2022.
Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?	YES	Council approves all expenses as and when occurred.

Additional comments: 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 legislation.

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
Does the Council maintain a register of material assets it owns and manage this in accordance with proper practices?9	YES	The Asset Register was reviewed and updated at a meeting of full council held 10 th June 2021 and reflects those items listed under insurance and within the parish council's remit for maintenance and ownership.
Is the value of the assets included? (Note value for insurance purposes may differ)	YES	
Are records of deeds, articles, land registry title number available?	N/A	
Is the asset register up to date and reviewed annually?	YES	The Asset Register details regular reviews with full council discussing at a meeting held 10 th June 2021.
Cross checking of insurance cover	YES	At a meeting of council held 10 th June 2021 it was recorded that new quotes were received by other Insurers which would have included a review of the assets to ensure these were covered within the insurance.
Additional comments:		

⁹ Practitioners Guide

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
Is bank reconciliation regularly completed and reconciled with the cash book and cover every account?	YES	Bank Reconciliations are conducted on a regular basis with a councillor approving the accounts. Evidence was provided that this was minuted at full council meetings.
Do bank balances agree with bank statements?	YES	Bank balances agree with period end statements and, as at year end 31st March 2022 the balance across the council's accounts stood at £57,890.23.
Is there regular reporting of bank balances at Council meetings?	YES	Account balances are recorded on a monthly basis within the Financial Report / Bank Reconciliations at full council meetings.

Additional comments: In accordance with Proper Practices, council has implemented a system whereby a councillor carries out a review of the Council's banking internal control by formally signing off the bank reconciliation. This is not only good practice but also is a safeguard for the RFO and fulfils one of the authority's internal control objectives

Section 11 – year end procedures		
Evidence		Internal auditor commentary
Are appropriate accounting procedures used?	YES	The accounts are produced on receipts and expenditure basis.
Financial trail from records to presented accounts	YES	There is a clear financial trail from budgeting, invoice, authorisation, payment and banking.
Has the appropriate end of year AGAR ¹⁰ documents been completed?	YES	As Council is a smaller authority with gross income and expenditure exceeding £25,000 it will be required to complete Part 3 of the AGAR.
Did the Council meet the exemption criteria and correctly declared itself exempt?	N/A	
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?	YES	The dates for the exercise of public rights were set as 14 th June 2021 to 23 rd July 2021 which included the mandatory first 10 working days of July. This was documented in the councils' minutes then evidenced on the council's website with the notice publicised.
Have the publication requirements been met in accordance with the Regulations?	YES	The Council has complied with the requirements of the Accounts and Audit Regulations 2015 for smaller authorities with income and expenditure exceeding £25,000 but not exceeding £6.5 million for the year ending 31 March 2021 and published the following on a public website: Internal Audit Report of the AGAR Section 1 – Annual Governance Statement of the AGAR Section 2 – Annual Accounting Statements of the AGAR Section 3 – External Audit Report and Certificate. Notice of the period for the exercise of public rights The Notice of the conclusion of audit should also be published on the website.

Additional comments:

¹⁰ Annual Governance & Accountability Return (AGAR)

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		Internal auditor commentary
Has the Council considered the previous internal audit report?	YES	The Internal Audit Report was considered by full council at a meeting held 4 th May 2021 at which it was agreed the Clerk / RFO was to produce an action plan for any recommendations.
Has appropriate action been taken regarding the recommendations raised?	YES	One action point was highlighted within the Financial Regulations. Council has since reviewed their regulations.
Has the Council confirmed the appointment of an internal auditor?	YES	The council confirmed the appointment of the Internal Auditor for the period under review at a meeting held 10 th March 2022.
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		Internal auditor commentary	
Has the Council considered the previous external audit report? ¹¹	YES	This was noted and recorded at a meeting of full council held 8 th September 2021.	
Has appropriate action been taken regarding the comments raised?	YES	No issues were raised within the external report.	
Additional comments:	•	•	

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¹¹ 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		Internal auditor commentary
Was the annual meeting held in accordance with legislation? 12 (Note to auditor- emergency Regulations because of the COVID-19 pandemic) 13	YES	The Annual Parish Council Meeting was held 4 th May 2021 with its first item on the agenda the election of the Chairman and signing of the Declaration of Acceptance of Office as specified in the councils Standing Orders.
Is there evidence that Minutes are administered in accordance with legislation? 14	YES	Council has a page numbering system with minutes signed and dated as a true record of the meeting held.
Is there a list of members' interests held?	YES	A link is provided on the Parish Councils website to the District Authority's website of the Register of Interests for current Parish Councillors. Council is reminded that whilst the monitoring officer of the District Council must arrange for the parish council's register of members' interests to be available, where the parish council has its own website, its register of members' interests must also be published on that website. (Openness and transparency on personal interests - A guide for councillors – August 2012)
Does the Council have any Trustee responsibilities and if so, are these clearly identified in a Trust Document?	N/A	
Has the Transparency Code been correctly applied, and information published in accordance with current legislation?	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 (turnover exceeding £200,000).
Has the Council registered with the Information Commissioner's Office (ICO)? ¹⁵	YES	The Council is registered with the ICO as a data controller. Registration Certificate ZA189657 expiry date 20 th June 2022.
Is the Council compliant with the General Data Protection Regulation requirements?	YES	The council has taken steps to ensure compliancy with multiple policies and procedures documented on the website ensuring the council, staff and

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

¹³ The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020

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

¹⁵ Data Protection Act 2018

Last reviewed: 7th April 2022

Has the Council published a website accessibility statement on their website in line with Regulations? ¹⁶ Does the council have official email addresses for correspondence? ¹⁷	YES Partly Met	parishioners' data is protected and that they are aware of the steps to be taken should there be a need. The council has published a Website Accessibility Statement which was tested on 12 th August 2020 by Community Action Suffolk. Clerk and Councillor email addresses are that of gmail accounts and whilst the clerks' email is clearly linked to the Palgrave Parish Council, the Chairmans does not appear to be and may well be independent to a personal account, although these may be set up for council purposes only. Recommendation: Council should consider using a secure e-mail system with a gov.uk address which is owned by the parish council (section 5.16 of the Practitioners' Guide to Proper Practices – March 2021) rather than relying on the use of personal e-mail addresses that can change regularly. This reduces the risk of correspondence going astray or being delayed. Unable to confirm due to virtual audit.
Is there evidence that electronic files are backed up?	N/A	Unable to confirm due to virtual audit.
Do terms of reference exist for all committees and is there evidence these are regularly reviewed? Additional comments:	YES	Terms of Reference for Committees are provided on the councils' website. It is detailed these were last reviewed 11 th March 2021.

Signed: J.Lawes

Date of Internal Audit Visit: N/A Date of Internal Audit Report: 05th May 2022

On behalf of Suffolk Association of Local Councils

¹⁶ Website Accessibility Regulations 2018

¹⁷ Practitioners Guide