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Our Ref: MARK/UPP001

Mrs C Price
Upper Beeding Parish Council
3 Hyde Square
Upper Beeding
West Sussex
BN44 3JE

Date 29th April 2020

Dear Celia

Re: Upper Beeding Parish Council
Internal Audit Year Ended 31st March 2020

Following completion of our interim internal audit on the 8th November 2019 and final audit on 29th April 2020 we enclose our report for your kind attention and presentation to the council. The audit was conducted in accordance with current practices and guidelines and testing was risk based. Whilst we have not tested all transactions, our samples have where appropriate covered the entire year to date. Where appropriate **recommendations for future action are shown in bold text and summarised in the table at the end of the report.**

Due to the COVID-19 restrictions in place at the time of the final audit, this was carried out remotely, and I would like to thank Celia for ensuring all of the requested information was sent through in a timely fashion to allow this process to be completed.

The Accounts and Audit Regulations 2015 require smaller authorities, each financial year, to conduct a review of the effectiveness of the system of internal control and prepare an annual governance statement in accordance with proper practices in relation to accounts. The internal audit reports should therefore be made available to all members to support and inform them when they considering the authority's approval of the annual governance statement.

Interim Audit – Summary Findings

At the interim visit we reviewed and performed tests on the following areas:

- Review of the Financial Regulations and Standing Orders
- Review of the risk assessments
- Review of the budgeting process
- Proper bookkeeping – review of the use of the accounts package
- Review of salaries
- Review of fixed asset register

It is our opinion that the systems and internal procedures at Upper Beeding Parish Council are well established and followed. The Clerk is experienced and ensures the council follows best practice regulations and has overseen changes to the internal procedures as regulations and technologies have changed to maintain compliance. It is

apparent that a large amount of work has carried out to implement the recommendations of previous internal audit reports, and the Clerk is to be commended for this.

It is clear the council takes governance, policies and procedures very seriously and I am pleased to report that overall, the systems and procedures you have in place are fit for purpose. I would like to thank Celia for her assistance, and whilst my report may contain recommendations to change these are not indicative of any significant failings, but rather are pointers to improving upon an already well-ordered system.

Final Audit – Summary Finding

At the final visit we reviewed and performed tests on the following areas:

- Review of annual accounts and AGAR
- Review of bank reconciliation
- Review of income
- Review of salaries
- Review of information for external auditor

I am of the opinion that the annual accounts and AGAR are ready to be signed off by council and the external auditor and that the AGAR is a true and fair reflection of the financial transactions of the council for the year ended 31st March 2020. Accordingly, I have signed off the AGAR.

A. BOOKS OF ACCOUNT (INTERIM AUDIT)

The council continues to use RBS for recording the day to day transactions of the council. This is a tried and tested industry specific package and I make no recommendation to change. There are approximately 10 transactions per week on average. The system is used regularly to report on and record the financial transactions of the council.

Regular financial reporting is produced for council meetings, and my audit testing showed that supporting documentation could be easily located from records. I make no recommendation to change in this system.

The council is not VAT registered. The last reclaim was for the period ending 30 September 2019. The council is up to date with its postings.

Overall, I have the impression that the accounting systems are well ordered and routinely maintained.

I am of the opinion that the control assertion of “Appropriate accounting records have been properly kept throughout the financial year” has been met.

B. FINANCIAL REGULATIONS, GOVERNANCE AND PAYMENTS (INTERIM AND FINAL AUDIT)

Interim Audit

Check the publication and minuting of the prior year audited AGAR and notice of conclusion of audit

The 2018/19 external auditors report was not qualified. This was reported to council at the November 2019 meeting and has been posted to the council website.

Confirm by sample testing that councillors sign statutory office forms

I confirmed by sample testing that councillors sign “Acceptance of Office” forms and Register of Members Interests, in line with regulations. It was noted that although most Councillors have agreed to receive communications electronically, they have not formally signed an acceptance to do so. It is recommended this is completed using the following wording ‘As per schedule 12 of the Local Government Act 1972, I give my consent to receive communication by electronic means.’

Confirm that the council is compliant with the relevant transparency code

I note that the council is not required by law to follow the 2015 Local Government Transparency Code. All councils are encouraged to follow the code to provide greater transparency for the public and to reduce the potential of Freedom of Information (FOI) requests. A review of the web site shows that the council has established a data transparency tab, and information is easily accessible via this to meet the principles of the code.

Confirm that the council is compliant with the GDPR

The council is aware of GDPR and has undergone training. It was noted the council has common email addresses internally and for councillors. This is recommended because it gives a natural segregation between personal and councillor business, so it is clear beyond doubt in what capacity a councillor is acting, gives control to the council, adds a degree of professionalism and in the event of a FOI request limits access to personal computers. The council has appointed an external Data Protection Officer (DPO), although the council has decided the required GDPR and Data Protection policies will be produced by a councillor, who has experience in this area. These are not yet in existence, and **I recommend these are implemented as soon as possible to comply with the regulations**. Further checks will be conducted at the year-end audit.

Confirm that the council meets regularly throughout the year

The council has the following committees:

- Full Council - meets monthly (except August)
- Finance – meets quarterly
- Sports & Leisure - meets every two months
- Amenities - meets every two months
- Planning - meets every two weeks
- Staffing – been set up but is yet to meet

Check that agendas for meetings are published giving 3 clear days' notice

The Clerk was able to demonstrate that at least 3 clear days' notice is given on both web site and hard copy agendas. Whilst we have not tested every single committee and council meeting there was no evidence of non-compliance in giving three clear days' notice of the meeting. It was noted that the supporting documentation referred to in the agendas is also posted to the website.

Check the draft minutes of the last meeting(s) are on the council's website

Draft minutes are typically published within a week of the meeting, and subsequently replaced by approved versions. Draft minutes are clearly marked as such.

Confirm that the Parish Council's Standing Orders have been reviewed within the last 12 months

The Standing Orders are based on the NALC model (2018 version) and were last reviewed and adopted by council in March 2019.

Confirm that the Parish Council has adopted and recently reviewed Financial Regulations

The Financial Regulations are based on the NALC model (2019 version) and were last reviewed and adopted by council in October 2019. The regulations being based on the NALC model contain provisions for the approval of spending, setting of budgets, reconciliation of the bank and reporting to council.

Check that the council's Financial Regulations are being routinely followed

Financial regulation 2.2 deals with bank reconciliations. The council is performing regular bank reconciliations, and this is minuted at council meetings in accordance with regulations.

Financial regulation 4 deals with budgetary control and authority to spend. Approval levels are currently set as below:

- Council - for all items over £5,000
- A duly delegated committee of the council – for all items over £1,000
- The Clerk – for any items below £1,000

Financial Regulation 5 deals with authorisation of payments. From sample checking, minutes show authorisation of payments lists in accordance with regulations and invoices are signed by a councillor.

Financial regulation 6 deals with making payments. The council makes payments predominately by BACS, with occasional cheque payments. There is a natural segregation of duties between the person inputting and the person releasing payments. Cheques must be signed by two individuals. There are six individuals are authorised to sign cheques.

Financial regulation 7 deals with approval and authorisation of salaries, the minutes and files show evidence of authorisation of changes and of wages generally.

Confirm all section 137 expenditure meets the guidelines and does not exceed the annual per elector limit of £8.12 per elector

The council has the General Power of Competence (GPC) and has no section 137 expenditure.

Confirm that checks of the accounts are made by a councillor

The system noted above details internal review takes place. I am under no doubt that council properly approves expenditure.

I am of the opinion the council is following its own regulations and that any changes to financial regulations are to be considered minor and not indicative of errors in the system.

Final Audit

It was noted that the council now has a Privacy Policy on its website, and I am pleased to see the council has reacted positively to recommendations made in the interim audit report. I am of the opinion that the control assertion “This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for” has been met.

C. RISK MANAGEMENT AND INSURANCE (INTERIM AND FINAL AUDIT)

Interim Audit

The council has a comprehensive risk assessment that covers financial, operational and health and safety risks. This was last reviewed and adopted in June 2019.

I have confirmed that the council has a valid insurance certificate. The council reviews its insurance requirements as part of the renewal process. The council has Public Liability and Employers’ Liability cover of £10million and a Fidelity Guarantee cover of £150,000. **I would recommend the Fidelity Guarantee level is reviewed to ensure it covers the maximum balance held at any point during the year.**

Final Audit

I am of the opinion that the control objective of “This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these” has been met.

D. BUDGET, PRECEPT AND RESERVES (INTERIM AND FINAL AUDIT)

Interim Audit

I confirmed that the 2020-21 budget and precept setting process has started, with each committee having reviewed their own budget (including a three-year budget plan) through a thorough planning exercise initiated by the Clerk.

The intention is to agree the final budget at the December 2019 council meeting and the precept at the January 2020 council meeting.

This represents substantial progress for the council and the development of the three-year budget plan will support the council's future objectives.

As at the interim audit date, the council had spent £82,071 against an expenditure budget of £202,025, suggesting that the budget was appropriately set and adhered to during the year.

The council holds limited reserves, which has been highlighted in previous internal audit reports. Within the budget setting process, there are plans to add £10,000 per year to the general reserve in each of the next three years in addition to creating new specific earmarked reserves.

Final Audit

At year-end, the council had £100,000 in earmarked reserves and a further £9,767 in general reserve.

The earmarked reserves include a total of £98,000 for the cemetery, a joint project between three parish councils where Upper Beeding Parish Council control the finances. Each year, any surplus/deficit for the cemetery is intended to add/subtract from cemetery earmarked reserve, and it is clear this has not happened for several years, leading to a misstatement of the council's reserves position.

The issue with the cemetery earmarked reserve has been raised by the Clerk and discussions are ongoing to find a permanent solution to avoid future confusion.

General guidance recommends an appropriate level of general reserve as 50% of precept, adjusted for local conditions. The level of general reserve held is significantly lower than normally expected and the council should consider options for addressing this to avoid a situation where the council faces a cashflow problem.

I am of the opinion that the control objective of "The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate" has been met.

E. INCOME (INTERIM AND FINAL AUDIT)

Interim Audit

Other than the precept, the council receives income from:

- Allotments
- Sports Facilities hire
- CIL / s.106

Both parts of the precept have been received and verified to the bank statement.

Final Audit

I am of the opinion that the control objective of "Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for" has been met.

F. PETTY CASH (INTERIM AUDIT)

The council no petty cash.

G. PAYROLL (INTERIM AND FINAL AUDIT)

Interim Audit

Payroll is processed externally by a third party, with payments being made by the external company through the BACS bureau. All staff members have signed contract of employment. Salaries are currently paid two months in arrears, and it is recommended that council review this. Checks of the PAYE and NI deductions will be completed at year-end. There are no councillor allowances apart from the Chairman's allowance.

Final Audit

A review of the accounting records made available remotely confirms the total salary costs as accurately recorded on the AGAR. Detailed checking of PAYE and NI deductions was not possible, and this will be checked at the next audit.

I am of the opinion that salaries are correctly stated on the AGAR and that the control objective of "Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied" has been met.

H. ASSETS AND INVESTMENTS (INTERIM AND FINAL AUDIT)

Interim Audit

The Clerk is in the process of developing a more thorough asset register and this will be reviewed at the year-end audit.

Final Audit

The Clerk has developed an asset register since the interim audit, detailing asset details, location, date of acquisition, condition and insurance values alongside the asset value itself. The total on the asset register was checked and found to match that entered on the AGAR for 2019-20.

I am of the opinion that the control objective of "Asset and investments registers were complete and accurate and properly maintained" has been met.

I. BANK AND CASH (INTERIM AND FINAL AUDIT)

Interim Audit

At the interim audit date, the council had a reconciled bank position as at the end of September 2019 which has been signed in accordance with Financial Regulations and was reported to council. I have reviewed the reconciliation and there were no errors.

Final Audit

At the year-end audit date, the council had a reconciled bank position across all three of its accounts. There were unrepresented items totalling £3,500 on the main current account as at 31 March 2020.

I am of the opinion that bank and cash balances are properly shown on the AGAR and that the control objective of "Periodic and year-end bank account reconciliations were properly carried out" has been met.

J. YEAR END ACCOUNTS (FINAL AUDIT)

The year-end accounts have been correctly prepared on the income and expenditure basis, and the AGAR correctly casts and cross casts.

The explanation of variances has been completed with sufficient detail and explanations provided for variances in excess of 15% for boxes 2, 7 and 8. At the time of the year-end audit, the AGAR figures presented for checking were as below:

| AGAR Box Number | | 2018/19 | 2019/20 | Auditor Notes |
|-----------------|--|---------|---------|---|
| 1 | Balances brought forward | 90,829 | 70,222 | Correctly carried over from box 7 2018/19 |
| 2 | Precept or rates and levies | 137,500 | 174,075 | Confirmed against precept amount received |
| 3 | Total other receipts | 53,443 | 60,210 | Confirmed against accounting records |
| 4 | Staff costs | 61,741 | 66,131 | Confirmed against accounting records |
| 5 | Loan interest/capital repayments | 0 | 0 | Council has no borrowing |
| 6 | All other payments | 149,809 | 128,609 | Confirmed against accounting records |
| 7 | Balances carried forward | 70,222 | 109,767 | Total correctly equals (1+2+3) – (4+5+6) |
| 8 | Total value of cash and short-term investments | 68,600 | 104,993 | Confirmed against RBS reconciliation |
| 9 | Total fixed assets plus long term investments and assets | 709,445 | 725,738 | Total matches asset register |
| 10 | Total borrowings | 0 | 0 | Council has no borrowing |

I am satisfied that the control objective “Accounting statements prepared during the year were prepared on the correct accounting basis, agreed to the cash book, supported by an adequate audit trail from underlying records” has been met.

K. TRUSTEESHIP (INTERIM AUDIT)

The council has no trusts.

L: EXERCISE OF PUBLIC RIGHTS - INSPECTION OF ACCOUNTS (FINAL AUDIT)

Due to the Covid 19 outbreak, the statutory deadlines have been changed as follows:

The publication date for final, audited, accounts will move from the 30 September to 30 November 2020 for all local authority bodies. To give local authorities more flexibility, the requirement for the public inspection period to include the first 10 working days of July has been removed. Instead, local authorities must commence the public inspection period on or before the first working day of September 2020.

This means that draft accounts must be approved by 31 August 2020 at the latest. However, they may be approved earlier, and we would encourage councils to do so wherever possible, to help manage overall pressure on audit firms towards the end of the year.

Authorities must publish the dates of their public inspection period, and given the removal of the common inspection period and extension of the overall deadlines for this year, it is recommended that all authorities provide public notice on their websites when the public inspection period would usually commence, explaining why they are departing from normal practice for 2019/20 accounts.

The regulations implementing these measures were laid on 7 April and are due to come into force on 30 April 2020.

The relevant dates as set by Upper Beeding Parish Council are set out in the table below.

| Inspection - Key date | 2018/19 Actual | 2019-20 Proposed |
|--|----------------|------------------|
| Accounts approved at full council | 18 June 2019 | To be confirmed |
| Date Inspection Notice Issued | 19 June 2019 | 3 June 2020 |
| Inspection period begins | 20 June 2019 | 4 June 2020 |
| Inspection period ends | 31 July 2019 | 15 July 2020 |
| Correct length | Yes | Yes |
| Common period included? | Yes | Yes |
| Summary of rights document on website? | Yes | Yes |

I am satisfied the requirements of this control objective were met for 2018-19, and assertion 4 on the annual governance statement can therefore be signed off by the council.

Should you have any queries please do not hesitate to contact me.

Kind regards

Yours sincerely

A Beams

Andy Beams