



## MULBERRY & CO

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Our Ref: MARK/UPP001

Mrs C Price  
Upper Beeding Parish Council  
The Gladys Bevan Hall  
Church Lane  
Upper Beeding  
West Sussex  
BN44 3HP

21 October 2020

Dear Celia

**Re: Upper Beeding Parish Council**  
**Internal Audit Year Ended 31<sup>st</sup> March 2021**

### **Executive Summary**

Following completion of our interim internal audit on 21 October 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. The council was provided a list of items in the plan to prepare in advance and from this we selected further items to sample. 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 tables at the end of the report.**

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

- Review of the accounting system and financial reporting package
- Review of the Financial Regulations and Standing Orders
- Review of the risk assessments and insurance
- Review of the budgeting process
- Review of salaries
- Review of fixed asset register

Our sample testing did not uncover any errors or misstatements that require reporting to the external auditor, nor did we identify any significant weaknesses in the internal controls such that public money would be put at risk.

The Clerk is very experienced, and it is clear the council takes governance, policies and procedures very seriously. 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.

It is therefore our opinion that the systems and internal procedures at Upper Beeding Parish Council are well established and followed.

**Regulation**

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. In addition to this, a smaller authority is required by Regulation 5(1) of the Accounts and Audit Regulations 2015 to “undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.”

Internal auditing is an independent, objective assurance activity designed to improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The purpose of internal audit is to review and report to the authority on whether its systems of financial and other internal controls over its activities and operating procedures are adequate and effective.

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.

**Independence and competence**

Your audit was conducted by Andy Beams of Mulberry & Co. We confirm we are independent from the management of the financial controls and procedures of the council and neither the internal auditor or the firm have any conflicts of interest with the audit client, nor do they provide any management or financial assistance to the client.

Your auditor has over 30 years’ experience in the financial sector with the last 10 years specialising in local government.

**Engagement letter**

An engagement letter was issued in September 2020 covering the 2020/21 internal audit assignment. Copies of this document are available on request.

**Planning and inherent risk assessment**

The scope and plan of works including fee structure was issued to the council in September 2020 under separate cover. Copies of this document are available on request. In summary, our work will address each of the internal control objectives as stated on the Annual Internal Audit Report of the Annual Governance and Accountability Return (AGAR).

- There have been no instances of breaches of regulations in the past
- The client uses an industry approved financial reporting package
- The client regularly carries out reconciliations and documents these
- There is regular reporting to council
- The management team are experienced and informed
- Records are neatly maintained and referenced
- The client is aware of current regulations and practices
- There has been no instance of high staff turnover

It is my opinion that the inherent risk of error or misstatement is low, and the controls of the council can be relied upon and as such substantive testing of individual transactions is not required. Testing to be carried out will be “walk through testing” on sample data to encompass the period of the council year under review.

**A. BOOKS OF ACCOUNT (INTERIM AUDIT)*****Internal audit requirement***

*Appropriate accounting records have been properly kept throughout the financial year.*

The council continues to use RBS as a day to day accounting package. This is a tried and tested industry specific package and I make no recommendation to change. The system is used regularly to report on and record the financial transactions of the council.

The council is not VAT registered. VAT reclaims are completed on a quarterly basis. The last VAT reclaim was for the period to the end of September 2020 and showed a refund position of £1,741.44 which is yet to be received to the bank account. I confirmed receipt of the previous refund amount through the council's bank account. The council is up to date with its postings.

Overall, I have the impression that the accounting systems are well ordered and routinely maintained and as such I make no recommendation to change.

At the interim audit date, 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)*****Internal audit requirement***

*This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.*

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

Due to the extended deadlines for this year, the external auditors report and notice of conclusion of audit for 2019/20 have not yet been returned by the external auditor. On review of the council's website, it is clear this is routinely published upon receipt and the item had been included for discussion on the September council agenda but deferred due to non-receipt.

*Confirm by sample testing that councillors sign statutory office forms*

I confirmed by sample testing that councillors sign "Acceptance of Office" forms, agreement to receive electronic communications and the web site shows the Register of Disclosable Pecuniary Interests for each councillor alongside their contact information.

*Confirm that the council is compliant with the relevant transparency code*

The council has a new website under development, which will be fully compliant with Accessibility legislation. A review of the website shows that the council is following the code through the publication of all the required information in a clear and transparent way.

*Confirm that the council is compliant with GDPR*

The council is fully aware of GDPR and has undergone training. It was noted the council has established common email addresses for all councillors. This is recommended because it gives a natural segregation between work and personal lives, making it clear beyond doubt in what capacity a councillor is acting. In addition to this it 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) and has a Privacy Notice on the home page of its website and has a Data Protection Policy which was last reviewed and updated in March 2020. It is clear the council takes its responsibilities seriously and has made every effort to comply with the legislation.

***Confirm that the council meets regularly throughout the year***

In addition to full council, the council has four committees for Finance, Community, Facilities and Staffing each with terms of reference. There is also a working group set up with regard to the newsletter. A diary of meetings is available on the council website.

***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 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 is noted that the non-confidential supporting documentation referred to in the agendas is included as a hyper-linked in the agenda itself. This is an excellent way of providing full transparency for residents, and easy access to required information.

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

Draft minutes are routinely uploaded to the council website and clearly marked as draft. These are subsequently replaced by final versions once approved. Arrangements have been put in place during the period of remote meetings for signatures to be obtained on final minutes.

***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. They were last reviewed and adopted by council on 20 October 2020 [minute ref C: 1020:10]. The regulations made under The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 were adopted by council in May 2020 [minute ref C: 0520:13].

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

Financial regulations are based on the NALC model. They were last reviewed and adopted by council on 20 October 2020 [minute ref C: 1020:11]. The regulations contain provisions for the approval of spending, setting of budgets, reconciliation of the bank and reporting to council. There have been minor amendments made to the model to reflect local procedures.

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

The council is performing a monthly bank reconciliation for each account. These are reported to council and a review of the minutes confirms this action is being reported.

I reviewed the most recent bank reconciliations. There were no errors identified for any of the samples provided and these were signed in accordance with Financial Regulation.

The council has thresholds in place at which authorisations to spend must be obtained 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

It was noted that the emergency authorisation level for the Clerk is £1,000. There is also provision for up to £2,000 with the additional authorisation of any two councillors.

Council receive payment listings, detailed and summarised income and expenditure reports along with a summary from the Chairman of the Finance Committee and evidence of this is recorded in the minutes of the meetings. A This is in accordance with Financial Regulations.

I checked a sample of payments randomly chosen from the list presented to the October council meeting. Copies of invoices were provided along with the online banking payment list, and these were confirmed to the amounts authorised.

*Confirm all section 137 expenditure meets the guidelines and does not exceed the annual per elector limit of £8.32 per elector.*

The council has the General Power of Competence (GPC) and the thresholds do not apply.

*Confirm that checks of the accounts are made by a councillor.*

The system noted above details internal review takes place at councillor, committee and council level. I am under no doubt that council properly approves expenditure.

At the interim audit date, 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 no indicative of errors in the system. I am therefore 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 AUDIT)**

#### **Internal audit requirement**

*This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.*

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. Due to the cancellation of meeting during the pandemic, this has yet to be reviewed but is on the agenda for the Finance Committee in November 2020.

The council has a valid insurance policy in place with AXA in a long term agreement expiring September 2021. The policy includes Public Liability and Employers Liability cover of £10 million and a Fidelity Guarantee level of £150,000. Previous reports advised the council to consider the level of Fidelity Guarantee and the council reviewed this in December 2019 [minute ref C: 1219:18] and concluded the level was adequate but would be reviewed regularly.

At the interim audit date, 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)**

#### **Internal audit requirement**

*The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.*

I confirmed that the 2020-21 budget and precept setting process is about to commence. The first draft is planned to be discussed at the Finance Committee meeting in November, with a second review in December and subsequent review by council later that month.

I have confirmed that in accordance with Financial Regulations, regular reporting of budget against expenditure is carried out and reviewed at Finance Committee meetings. Review recent minutes shows consideration given to the council's overall financial position.

At the interim audit date, the RBS system shows a total of circa £99,000 in earmarked reserves and a further circa £11,000 in general reserves. General guidance recommends the council's general reserve should be circa 50% of precept, or 3-6 months net revenue expenditure (NRE), as adjusted for local conditions.

The low general reserve has been addressed in previous reports there are plans to add £10,000 per year to the general reserve in each of the next three years.

At the interim audit date, the council's income has already exceeded the annual budget and expenditure at 43.5% of budget.

At the interim audit date, 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)**

##### ***Internal audit requirement***

*Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.*

Apart from the precept, the council's other income sources are allotment rental, sports hall hire and grants.

The Covid-19 pandemic has not had a substantial impact on the council's income, and receipt of a grant for £10,000 from the District Council has enabled the council to continue to carry out all of its planned functions. The council has also stopped major projects during the pandemic to keep expenditure under control.

At the interim audit date, 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)**

##### ***Internal audit requirement***

*Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.*

The council has no petty cash.

#### **G. PAYROLL (INTERIM AND FINAL AUDIT)**

##### ***Internal audit requirement***

*Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.*

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. Checks of the PAYE and NI deductions will be completed at year-end. There are no councillor allowances apart from the Chairman's allowance.

At the interim audit date, I am of the opinion that salaries are correctly stated on the AGAR and that the control object 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)**

##### ***Internal audit requirement***

*Asset and investments registers were complete and accurate and properly maintained.*

The Clerk has developed an asset register 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. A physical check of the assets was completed during July and it is recommended this is noted on the register.

At the interim audit date, 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)**

#### ***Internal audit requirement***

*Periodic and year-end bank account reconciliations were properly carried out.*

Bank reconciliations are reviewed at Finance Committee meetings. At the interim audit date, the sample reconciliations were reviewed for each bank account and there were no errors identified. Arrangements have been put in place during the period of remote meetings for signatures to be obtained.

At the interim audit date, 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)**

#### ***Internal audit requirement***

*Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.*

To be reviewed at the year end.

### **K. LIMITED ASSURANCE REVIEW (FINAL AUDIT)**

#### ***Internal audit requirement***

*IF the authority certified itself as exempt from a limited assurance review in 2019/20, it met the exemption criteria and correctly declared itself exempt. (If the authority had a limited assurance review of its 2019/20 AGAR tick “not covered”)*

The council did not declare itself exempt from a limited assurance review in 2019/20.

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

#### ***Internal audit requirement***

*The authority has demonstrated that during summer 2020 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations.*

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

The Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 (SI 2020/404) amended the deadline by which the Annual Governance Statement and Statement of Accounts of the Annual Governance and Accountability Return (AGAR) together with any certificate or opinion issued by the local auditor must be published from 30 September 2020 to 30 November 2020.

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

Previously there was a requirement for all smaller authorities to have a common period for the exercise of public rights, being the first 10 working days of July. Under the new regulations there is no requirement for a common period for the exercise of public rights. Smaller authorities are still required to set a period for this purpose, but the only requirement is that the 30 working day period for the exercise of public rights should start on or before the first working day of September, i.e. on or before 1 September 2020.

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 came into force on 30 April 2020.

I confirmed that arrangements are in place at this council to ensure proper exercise of public rights. Relevant dates are set out in the table below.

Inspection - Key date	2019/20 Actual	2020/21 Proposed
Date Inspection Notice Issued	3 June 2020	To be reviewed at year end
Inspection period begins	4 June 2020	To be reviewed at year end
Inspection period ends	15 July 2020	To be reviewed at year end
Correct length	Yes	To be reviewed at year end
Common period included?	n/a	To be reviewed at year end

I am satisfied the requirements of this control objective were met for 2019-20, and assertion 4 on the annual governance statement can therefore be signed off by the council.

I am of the opinion the control objective of "The authority has demonstrated that during summer 2020 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations" has been met.

### **M. TRUSTEESHIP (INTERIM AUDIT)**

#### ***Internal audit requirement***

*Trust funds (including charitable) – The council met its responsibilities as a trustee.*

The council has no trusts.

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

Yours sincerely

*A Beams*

**Andy Beams**

**For Mulberry & Co**