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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

19 April 2022

Dear Celia

Re: Upper Beeding Parish Council
Internal Audit Year Ended 31 March 2022

## **Executive summary**

Following completion of our interim internal audit on 22 October 2021 and final audit on 19 April 2022 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. Testing requirements are shown in red and where appropriate recommendations for future action are shown in bold text and summarised in the tables at the end of the report.

Our report is presented in the same order as the assertions on the internal auditor report within the published AGAR. The start of each section details the nature of the assertion to be verified, followed by recommended minimum testing requirements. Each section is then concluded with an opinion as to whether the assertion has been met or not.

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.

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 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.

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 effective.

Internal audit's function is to test and report to the authority on whether its specific system of internal control is adequate and working satisfactorily. 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 12 years specialising in local government.

## **Engagement Letter**

An engagement letter was issued to the council covering the 2021/22 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 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 AGAR.

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

At the interim audit date, 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.

## Table of contents

Α	BOOKS OF ACCOUNT (INTERIM AUDIT)	3
В	FINANCIAL REGULATIONS, GOVERNANCE AND PAYMENTS (INTERIM AND FINAL AUDIT)	3
С	RISK MANAGEMENT AND INSURANCE (INTERIM AND FINAL AUDIT)	5
D	BUDGET, PRECEPT AND RESERVES (INTERIM AND FINAL AUDIT)	6
Е	INCOME (INTERIM AND FINAL AUDIT)	7
F	PETTY CASH (INTERIM AUDIT)	8
G	PAYROLL (INTERIM AND FINAL AUDIT)	8
Н	ASSETS AND INVESTMENTS (INTERIM AND FINAL AUDIT)	9
- 1	BANK AND CASH (INTERIM AND FINAL AUDIT)	10
J	YEAR END ACCOUNTS (FINAL AUDIT)	10
K	LIMITED ASSURANCE REVIEW (FINAL AUDIT)	13
L	TRANSPARENCY (INTERIM AUDIT)	13
M	EXERCISE OF PUBLIC RIGHTS – INSPECTION OF ACCOUNTS (FINAL AUDIT)	13
N	PUBLICATION REQUIREMENTS (INTERIM AUDIT)	14
0	TRUSTEESHIP (INTERIM AUDIT)	15

#### A. BOOKS OF ACCOUNT (INTERIM AUDIT)

#### Internal audit requirement

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

## **Recommended minimum testing:**

- Ensure the correct roll forward of the prior year cashbook balances to the new financial year
- Check a sample of financial transactions in cashbooks to bank statements, etc.: the sample size dependent on the size of the authority and nature of accounting records maintained

#### Interim audit

The council continues to use the Rialtas Business Solutions (RBS) accounting software as a day-to-day accounting package. This is a tried and tested industry specific package and I make no recommendation to change.

The interim audit was conducted on site and the Clerk had prepared the requested information for review in advance. Records are kept in an orderly fashion, and the Clerk has developed and efficient and effective system for managing the council's finances. Other information for the interim audit was reviewed on the council website and through discussion with the Clerk. The website, which was under development at the last audit visit, is a good example of a council providing clear information for residents.

The council's formal documents are laid out in a clear way. Meeting agendas are logically structured and minutes show clear resolutions being made by committee and council. I make no recommendation to change this system.

The council is not VAT registered and completes reclaims via a VAT 126 claim form on a quarterly basis. The last VAT reclaim was for the period 1 July to 30 September 2021 inclusive and showed a refund position of £1,020.56. I confirmed this amount was received to the council's bank account on 21 October 2021. The council is up to date with its postings.

### **Section conclusion**

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.

- Review the procedures in place for acquisition of formal tenders and quotes, ensuring they are in line with the Standing Orders and Financial Regulations which should be based on the latest version.
- Ensure that consistent values are in place for the acquisition of formal tenders between Standing Orders and Financial Regulations (frequently different limits are recorded in the two documents)
- Review the procedures for receipt of invoices, agreement of invoice detail and confirmation of goods /services delivery
  and approval for payment: ideally, a suitably designed certification stamp should be in place providing for evidencing of
  these checks and payment authorisation
- Check that there is effective segregation between the writing of cheques or the setting up of online payments, and physical release of payments
- Check that VAT reclaims are prepared and submitted in a timely manner in line with the underlying records and in accordance with current HMRC requirements
- Where debit / credit cards are in use, establish the total monthly and individual transaction limits and ensure appropriate controls over physical security and usage of the cards are in place

#### Interim audit

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

The external auditor's report and Notice of Conclusion of Audit are published on the council website. The external auditor referenced an inconsistency with the completion of the Annual Governance Statement and Accounting Statement regarding trust funds, and this has been reported to council and acknowledged.

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

I confirmed by sample testing that councillors sign "Acceptance of Office" forms. The council website has details of the Disclosable Pecuniary Interests of each Member on the website.

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

The council has a transparency tab on its website, which provides information on what the Local Government Transparency Code is and the relevant information for Upper Beeding Parish Council. I was able to locate the required details, which are logically arranged and easy to access. The asset register is the only item missing, which is under review in process of updating as part of the new Maintenance Manager's role.

#### 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 a Privacy Notice and Accessibility Statement on the home page of its website. 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 committees for Finance, Staffing, Community, Facilities and Planning. There are regular scheduled meetings during the year, and a diary of future meetings up to and including the Annual Meeting in May 2022 is available on the 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 was noted that supporting documentation for agendas is also published on the council website.

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

Draft minutes are uploaded to the council website and clearly marked as draft. These are subsequently replaced with final versions once approved.

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

The standing orders are based on the most recent NALC model and were last reviewed and approve in May 2021.

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

Financial regulations are based on the latest NALC model and were last reviewed and approved in Mya 2021. The regulations 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.

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

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

It was noted that the Clerk also has discretion to spend in the event of extreme risk to the delivery of council services as outlined in FR 4.7 'Such expenditure includes repair, replacement or other work, whether or not there is any budgetary

provision for the expenditure, subject to a limit of £2,000, any individual amount between £1000 and £2000 will be authorised by the clerk and any two council members. The Clerk shall report such action to the chairman as soon as possible and to the council as soon as practicable thereafter.'

I reviewed expenditure items for the current financial year, and there was no evidence of the thresholds not being adhered to. The minutes of meetings confirm that income and expenditure reports are reviewed and lists of invoices for approval are presented to council.

I reviewed the invoices file and checked a sample against the cashbook. There were no errors in the entries and the invoices reviewed were all signed in accordance with Financial Regulations.

It is clear that Members are presented with sufficient information to make informed financial decisions.

Confirm all section 137 expenditure meets the guidelines and does not exceed the annual per elector limit of £8.41 per elector. The council has adopted the General Power of Competence (GPC) and the section 137 thresholds do not apply.

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

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

## **Final Audit**

I reviewed the council's website and am pleased to confirm that the information on it is updated regularly, including the Transparency Code information. It is clear the council makes every effort to keep residents informed through a comprehensive website.

#### **Section conclusion**

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 me.

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

## Internal audit requirement

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

## **Recommended minimum testing:**

- Ensure that authorities have prepared, and formally adopted, at least once annually, an appropriate and comprehensive register of assessed risks, both regular and ad hoc
- Ensure that appropriate levels of insurance cover are in place for land, buildings, public, employers' and hirers' (where applicable) liability, fidelity / employees (including councillors) liability, business interruption and cyber security
- Ensure that appropriate arrangements are in place for monitoring play areas, open spaces and sports pitches: such
  reviews should be undertaken by appropriately qualified external inspectors or, if by officers or members, that they have
  received the appropriate training and accreditation

## Interim audit

The council has a business risk assessment process in place. This lists the areas of risk identified, categorises them as low/medium/high, details how the risk is managed and the review period. A previous review of the assessment by the council identified actions required, and the Clerk was able to demonstrate the findings and the subsequent measures put in place by the council. This is an excellent example of a council taking risk management issues seriously, completing a review process and taking appropriate action and is to be applicated.

I confirmed that the council has a valid insurance policy in place with AXA in a long-term agreement expiring on 30 September 2022. The policy includes Public Liability and Employers Liability cover of £10 million each and an Employee Dishonesty (Fidelity Guarantee) level of £150,000.

Previous audit reports have highlighted the potential risk of the balances of the council exceeding the Fidelity Guarantee level and recommended increasing. These recommendations have been received and reviewed by council and I noted that in

December 2019 [minute ref C: 1219:18] the council conducted such a review and concluded the level was adequate but would be reviewed regularly. I encourage the council to carry out his review again to satisfy themselves that they are comfortable with this level of cover.

## Final audit

I note that following the recommendation in the interim report, the council reviewed the level of Fidelity Guarantee again, and this is under review at present (minute ref F:1121-08).

We discussed assertion 8 on the AGAR and whether or not this had any impact on the council.

"We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements."

The Clerk was able to confirm there were no matters excluded from the accounting statements.

#### Section conclusion

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.

## **Recommended minimum testing:**

- Ensure that the full authority, not a committee, has considered, approved and adopted the annual precept in accordance with the required parent authority timetable
- Ensure that budget reports are prepared and submitted to authority / committees periodically during the year with appropriate commentary on any significant variances
- Review the budget performance either during the year or at the financial year-end seeking explanations for any significant or unanticipated variances
- Ensure that the authority has considered the establishment of specific earmarked reserves and, ideally, reviews them annually as part of the budget assessment process
- Ensure that the precept in the accounts matches the submission form to the relevant authority and the public record of precepted amounts

#### Interim audit

The Clerk confirmed that the budget setting process for 2022/23 has begun with initial discussions having taken place. A first draft of the budget will be presented to council at the meeting in November, with sign off for the final budget figure anticipated in December. The council normally then agrees the precept at its January meeting, which also gives a final chance to review the budget if agreement had not been reached in December.

The council holds no money in earmarked reserves other than for the cemetery. The accounting arrangements for the joint burial committee have been problematic over the last few years, and through the diligence of the Clerk and the technical support of RBS, I am delighted to see that the situation has now been resolved.

Council is reminded that general guidance recommends a level of general reserve be maintained at circa six months equivalent of precept and this level will be reviewed at the year-end audit.

### **Final Audit**

The council's year-end position reports income at 107.1% of budget and expenditure is reported as 96.0% of budget. This suggests that the budget was accurately set and has been carefully monitored throughout the year, and this is evidenced by the minutes of meetings.

At year-end, the council held circa £65,000 in clearly annotated earmarked reserves spread across a variety of projects, including a ring-fenced amounts for CIL.

In addition, the council held circa £85,000 in the general reserve at the year-end. General guidance recommends an appropriate level of general reserve as circa six months equivalent of precept, adjusted for local conditions. The council has adopted a Reserves Policy which states the intention to keep circa four months operating costs (approx. £75,000) in general reserves and the current level aligns to this policy commitment.

The council resolved to authorise the Clerk in conjunction with the Chairman of the Finance Committee to make any year-end earmarked reserve adjustments, and these were carried out as part of the year-end process.

## **Section conclusion**

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.

## **Recommended minimum testing:**

- Review "aged debtor" listings to ensure appropriate follow up action is in place
- Allotments: ensure that appropriate signed tenancy agreements exist, that an appropriate register of tenants is maintained identifying, that debtors are monitored.
- Burials: ensure that a formal burial register is maintained that it is up-to-date and that a sample of interments and
  memorials are appropriately evidenced, that fees have been charged at the correct approved rate and been recovered
  within a reasonable time: (Authorities should also acquire and retain copies of Burial / Cremation certificates)
- Hall hire: ensure that an effective diary system for bookings is in place identifying the hirer, hire times and ideally cross-referenced to invoices raised
- Leases: ensure that leases are reviewed in a timely manner in accordance with the terms of the lease and rents similarly reviewed appropriately at the due time
- Other variable income streams: ensure that appropriate control procedures and documentation are in existence to provide a clear audit trail through to invoicing and recovery of all such income
- Where amounts are receivable on set dates during the year, ensure that an appropriate control record is maintained duly
  identifying the date(s) on which income is due and actually received / banked

## Interim audit

Apart from the precept, the council receives income from the allotments, sports hall, CIL income, interest and VAT refunds.

The Cemetery has separate bank accounts and RBS has been set up with a separate cost centre for recording the income form the cemetery, with debtors created for the other two councils involved in the arrangements. This now shows the true position of the funds, although a detailed explanation for the change in arrangements may be needed on the year-end variance report submitted to the external auditor.

At the November meeting, the Facilities committee are due to review the sports hall and allotment fees, as part of their budget setting process. The Clerk is aware of the 12-month notice requirement for changes to allotment fees. There is evidence within the minutes of meetings of previous reviews of fees and charges taking place.

## **Final Audit**

From a review of the RBS detailed information, it is clear that sufficient transactional detail continues to be provided for accounting entries and income appears to be assigned to appropriate nominal codes.

## **Section conclusion**

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.

## **Recommended minimum testing:**

- A number of authorities are now running down and closing their petty cash accounts and using debit / credit cards for ad hoc purchases. Consequently, a "not applicable" response is frequently required in this area.
- Review the systems in place for controlling any petty cash and cash floats (used for bar, catering, etc.)
- Check a sample of transactions during the financial year to ensure appropriate supporting documentation is held
- Review the existence of evidenced periodic independent verification of the petty cash and any other cash floats held
- Ensure that VAT is identified wherever incurred and appropriate
- Physically check the petty cash and other cash floats held
- Where bar or catering facilities are in place, ensure that appropriate cashing-up procedures are in place reconciling the physical cash takings to the till "Z" total readings

#### Interim audit

The council has no petty cash.

#### Section conclusion

I am of the opinion the control objective of "Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for" is not applicable as 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.

- Ensure that, for all staff, a formal employment contract is in place together with a confirmatory letter setting out any changes to the contract
- Ensure that appropriate procedures are in place for the payment of members allowances and deduction of any tax liability
- Ensure that, for a sample of staff salaries, gross pay due is calculated in accordance with the approved spinal point on the NJC scale or hourly rate, if off-scale, and with the contracted hours
- Ensure that appropriate tax codes are being applied to each employee
- Where free or paid for software is used, ensure that it is up to date.
- For the test sample of employees, ensure that tax is calculated appropriately
- Check the correct treatment of pension contributions to either the Local Government pension scheme (non taxable, deducted from the gross salary or DC schemes like NEST which already allow for tax deductions)
- For NI, ensure that the correct deduction and employer's contributions are applied: NB. The employers' allowance is not available to councils but may be used by other authorities
- Ensure that the correct employers' pension percentage contribution is being applied
- Ensure that for the test sample, the correct net pay is paid to the employee with tax, NI and pension contributions correctly paid to the respective agencies

#### Interim audit

The council uses external company to provide payroll services. The external provider completes all the PAYE and NI calculations and provides the information to the council to make the salary and HMRC payments. A review of the accounting records shows that HMRC payments are up to date.

All employees have a signed contract of employment, and the council is registered with the West Sussex County Council Pension (LGPS) scheme. There are no councillor allowances.

#### **Final Audit**

The amount entered in box 4 on the AGAR correctly reflects only allowable staff costs. The backdated pay rises have been paid to staff in March 2022, and I was able to independently confirm the backdated amount as correct.

## **Section conclusion**

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 (FINAL AUDIT)

## Internal audit requirement

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

## **Recommended minimum testing:**

## Tangible fixed assets

- Ensure that the authority is maintaining a formal asset register and updating it routinely to record new assets at historic cost price, net of VAT and removing any disposed of / no longer serviceable assets
- Physically verifying the existence and condition of high value, high risk assets may be appropriate
- Ideally, the register should identify for each asset the purchase cost and, if practicable, the replacement / insured cost, the latter being updated annually and used to assist in forward planning for asset replacement
- Additions and disposals records should allow tracking from the prior year to the current
- Ensure that the asset value to be reported in the AGAR at Section 2, Box 9 equates to the prior year reported value, adjusted for the nominal value of any new acquisitions and /or disposals
- Compare the asset register with the insurance schedule to ensure that all assets as recorded are appropriately insured or "self-insured" by the authority

## **Fixed asset investments**

• Ensure that all long-term investments (i.e., those for more than 12-month terms) are covered by the "Investment Strategy" and reported as Assets in the AGAR at Section 2, Box 9.

## Borrowing and lending

- Ensure that the authority has sought and obtained appropriate DMO approval for all loans acquired
- Ensured that the authority has accounted for the loan appropriately (i.e., recorded the full value of the loan. Any arrangement fee should be regarded as an admin expense) in the year of receipt
- Ensure that the combined principal loan repayment and interest for the year is correctly recorded in the AGAR at Section 2 Box 5
- Ensure that the outstanding loan liability as of 31st March each year is correctly recorded in the AGAR at Section 2, Box 10 (value should be verified via the DMO website)
- Where the authority has issued loans to local bodies, they should ideally seek signed indemnities from the recipient body, or their members, agreeing to underwrite the loan debt

#### **Final Audit**

The asset register format has been amended during the year and now includes columns detailing asset location, description, date of acquisition, supplier (where known), cost/proxy cost, insurance value, inspection date and condition of the asset. Additions and disposals during the year are noted on the register.

I confirmed that the council has no PWLB borrowing.

## **Section conclusion**

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.

## **Recommended minimum testing:**

- Ensure that bank reconciliations are prepared routinely, are subject to independent scrutiny and sign-off by members
- Verify the accuracy of the year-end bank reconciliation detail and ensure accurate disclosure of the combined cash and bank balances in the AGAR, Section 2, Box 8
- Where the authority has bank balances in excess of £100,000 it has an appropriate investment strategy

#### Interim audit

Bank reconciliations are reviewed and signed off at meetings, and I was able to confirm this in the minutes of the meetings. I reviewed the reconciliations and bank statements for July and August and found no errors. I was able to confirm the balances to the bank statements and noted that they have been signed by councillors in accordance with financial regulations.

## **Final Audit**

At the year-end audit date, the council had a reconciled bank position across all its accounts. There were no outstanding payments as of 31 March 2022 and I was able to confirm bank balances on all accounts to the relevant bank statements.

The council holds in excess of the Financial Services Compensation Scheme (FSCS) limit of £85,000 across the Unity Trust bank accounts. However, the Clerk confirmed that the council is aware of this and has adopted an Investment Policy and will be opening additional accounts to spread the risk and retain balances within the limit.

### **Section conclusion**

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.

- Ensure that, where annual turnover exceeds £200,000, appropriate records are maintained throughout the year on an Income and Expenditure basis to facilitate budget reporting in that vein
- Ensure that appropriate accounting arrangements are in place to account for debtors and creditors during the year and at the financial year-end

# **Final Audit**

# Section 1 – Annual Governance Statement

	Annual Governance Statement	'Yes' means that this authority	Suggested response based
			on evidence
1	We have put in place arrangements for	prepared its accounting statements in	YES –accounts follow latest
	effective financial management during the	accordance with the Accounts and	Accounts and Audit
	year, and for the preparation of the	Audit Regulations.	Regulations and
	accounting statements.		practitioners guide
			recommendations.
2	We maintained an adequate system of	made proper arrangements and	YES – there is regular
	internal control including measures	accepted responsibility for	reporting of financial
	designed to prevent and detect fraud and	safeguarding the public money and	transactions and accounting
	corruption and reviewed its effectiveness.	resources in its charge.	summaries, offering the
			opportunity for scrutiny.
3	We took all reasonable steps to assure	has only done what it has the legal	<b>YES</b> – the Clerk is
	ourselves that there are no matters of	power to do and has complied with	experienced and advises
	actual or potential non-compliance with	Proper Practices in doing so.	the council in respect of its
	laws, regulations and Proper Practices that		legal powers.
	could have a significant financial effect on		
	the ability of this authority to conduct its		
	business or manage its finances.		
4	We provided proper opportunity during	during the year gave all persons	YES – the requirements and
	the year for the exercise of electors' rights	interested the opportunity to inspect	timescales for 2020/21
	in accordance with the requirements of	and ask questions about this	year-end were followed.
	the Accounts and Audit Regulations.	authority's accounts.	
5	We carried out an assessment of the risks	considered and documented the	<b>YES</b> – the council has a risk
	facing this authority and took appropriate	financial and other risks it faces and	management scheme and
	steps to manage those risks, including the	dealt with them properly.	appropriate external
	introduction of internal controls and/or		insurance.
	external insurance cover where required.		
6	We maintained throughout the year an	arranged for a competent person,	YES – the council has
	adequate and effective system of internal	independent of the financial controls	appointed an independent
	audit of the accounting records and	and procedures, to give an objective	and competent internal
	control systems.	view on whether internal controls	auditor.
		meet the needs of this smaller	
		authority.	
7	We took appropriate action on all matters	responded to matters brought to its	YES – evidence of council
	raised in reports from internal and	attention by internal and external	considering
	external audit.	audit.	recommendations from
			audit reports.
8	We considered whether any litigation,	disclosed everything it should have	YES – no matters were
	liabilities or commitments, events or	about its business activity during the	raised during the internal
	transactions, occurring either during or	year including events taking place	audit visits.
	after the year-end, have a financial impact	after the year end if relevant.	
	on this authority and. Where appropriate,		
	have included them in the accounting		
	statements.	1	21/2 11 11 11
9	Trust funds including charitable – In our	has met all of its responsibilities	N/A – the council has no
	capacity as the sole managing trustee we	where, as a body corporate, it is a sole	trusts.
	discharged our accountability	managing trustee of a local trust or	
	responsibilities for the fund(s)/asset(s),	trusts.	
	including financial reporting and, if		

required, independent examination or	
audit.	

## Section 2 - Accounting Statements

At the time of the year-end audit, the AGAR figures presented for checking were as below:

AGAR Box Number		2020/21	2021/22	Auditor Notes
1	Balances brought forward	109,767	116,953	Correctly carried over from box 7 2020/21
2	Precept or rates and levies	199,125	199,492	Confirmed against precept amount received
3	Total other receipts	27,978	22,763	Confirmed against accounting records
4	Staff costs	65,919	71,951	Confirmed against accounting records
5	Loan interest/capital	0	0	Council has no borrowing
	repayments			
6	All other payments	153,953	117,576	Confirmed against accounting records
7	Balances carried forward	116,953	149,681	Total correctly equals (1+2+3) – (4+5+6)
8	Total value of cash and	174,250	212,347	Confirmed against accounting records and account
	short-term investments			balances
9	Total fixed assets plus	725,738	729,737	Verified against asset register
	long-term investments and			
	assets			
10	Total borrowings	0	0	Council has no borrowing
11	Disclosure note re Trust	YES	NO	Not applicable - Council has no trusts
	Funds (including			
	charitable)			

The year-end accounts have been correctly prepared on the income and expenditure basis with the box 7 & 8 reconciliation accurately completed. This shows total debtors of £2,812.67 (VAT) and total creditors of £65,478.60. The creditors include the appropriate shares of the JPCC balances attributable to Steyning and Bramber Parish Councils.

The Clerk is to be commended for her perseverance in resolving the JPCC issues, and the accounting statements are now an accurate reflection of the council's position.

The AGAR correctly casts and cross casts and the comparatives have been correctly copied over from the previous year's AGAR.

The explanation of variances has been completed with sufficient detail and explanations provided for variances in excess of 15% for boxes 3, 6, 7 and 8.

The Clerk has prepared the supporting documentation in accordance with the request from the external auditor, and I am of the opinion the AGAR is ready for review and signing by council prior to submission to the external auditor.

#### **Section conclusion**

I am of the opinion that the control assertion "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" has been met.

## 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")

## **Recommended minimum testing:**

- The correct exemption certificate was prepared and minuted in accordance with the statutory submission deadline
- That it has been published, together with all required information on the Authority's website and noticeboard

#### Section conclusion

I am of the opinion that the control assertion of "If the authority certified itself as exempt from a limited assurance review in 2020/21, it met the exemption criteria and correctly declared itself exempt" is not applicable due to the council not declaring itself exempt from a limited assurance review in 2020/21.

### L: TRANSPARENCY (INTERIM AUDIT)

## Internal audit requirement

If the authority has an annual turnover not exceeding £25,000, it publishes information on a website / webpage up to date at the time of the internal audit in accordance with the Transparency Code for Smaller Authorities

## **Recommended minimum testing:**

- This test applies only to those councils covered by the £25,000 External Audit exemption
- Internal auditors should review the authority's website ensuring that all required documentation is published in accordance with the Transparency Code for Smaller Authorities

#### Interim audit

The council has an annual turnover exceeding £25,000, and this test does not apply.

## **Section conclusion**

I am of the opinion that the control assertion of "If the authority has an annual turnover not exceeding £25,000, it publishes information on a website/ webpage up to date at the time of the internal audit in accordance with the Transparency code for smaller authorities" is not applicable due to the council turnover exceeding £25,000.

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

### Internal audit requirement

The authority has demonstrated that during summer 2021 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations.

- Internal auditors should acquire / examine a copy of the required "Public Notice" ensuring that it clearly identifies the statutory 30 working day period when the authority's records are available for public inspection.
- Internal auditors may also check whether councils have minuted the relevant dates at the same time as approving the AGAR

#### **Final Audit**

Inspection – key dates	2020/21 Actual	2021/22 Proposed
Date inspection notice issued	7 June 2021	6 June 2022
Inspection period begins	8 June 2021	7 June 2022
Inspection period ends	19 July 2021	18 July 2022
Correct length (30 working days)	Yes	Yes
Common period included (first	Yes	Yes
10 working days of July)		

I am satisfied the requirements of this control objective were met for 2020/21, and assertion 4 on the Annual Governance Statement can therefore be signed off by the council. I have confirmed that the proposed timescales for 2021/22 are within the requirements of this control objective.

### **Section conclusion**

I am of the opinion that the control assertion "the authority has demonstrated that during summer 2021 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations" has been met.

## **N: PUBLICATION REQUIREMENTS (INTERIM AUDIT)**

## Internal audit requirement

The authority has complied with the publication requirements for 2020/21. Under the Accounts and Audit Regulations 2015, authorities must publish the following information on the authority website / webpage.

## **Recommended minimum testing:**

- Internal auditors should acquire / examine a copy of the required "Public Notice" ensuring that it clearly identifies the statutory 30 working day period when the authority's records are available for public inspection.
- Internal auditors may also check whether councils have minuted the relevant dates at the same time as approving the AGAR

Before 1 July 2021 authorities must publish:

- Notice of the period for the exercise of public rights and a declaration that the accounting statements are as yet unaudited
- Section 1 Annual Governance Statement 2020/21, approved and signed, page 4
- Section 2 Accounting Statements 2020/21, approved and signed, page 5

Not later than 30 September 2021 authorities must publish:

- •Notice of conclusion of audit
- •Section 3 External Auditor Report and Certificate
- •Sections 1 and 2 of AGAR including any amendments as a result of the limited assurance review.

It is recommended as best practice, to avoid any potential confusion by local electors and interested parties, that you also publish the Annual Internal Audit Report, page 3.

### Interim audit

I was able to confirm that the publication requirements for 2020/21 have been met and the Notice of Public Rights is published on the council website.

### **Section conclusion**

I am of the opinion that the control assertion of "the authority has complied with the publication requirements for 2019/20 AGAR. Under the Accounts and Audit Regulations 2015, authorities must publish the following information on the authority website / webpage" has been met.

## O. TRUSTEESHIP (INTERIM AUDIT)

## Internal audit requirement

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

## **Recommended minimum testing:**

- Confirm that all charities of which the council is a Trustee are up to date with Charity Commission filing requirements
- that the council is the sole trustee on the Charity Commission register
- that the council is acting in accordance with the Trust deed
- · that the charity meetings and accounts are recorded separately from those of the council
- review the level and activity of the charity and where a risk-based approach suggests such, review the Independent Examiner's report

#### Interim audit

The council has no trusts.

## Section conclusion

I am of the opinion that the control assertion of "Trust funds (including charitable) – The council met its responsibilities as a trustee" is not applicable as the council has no trusts.

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

Yours sincerely

**Andy Beams** 

For Mulberry & Co