

Internal Audit Report for Holton Parish Council for the period ending 31 March 2023

Clerk	Elaine Day
RFO (if different)	-
Chairperson	Councillor Ed Rolph
Precept	£ 15,080.00
Income	£ 22,480.00
Expenditure	£ 22,368.44
General reserves	£ 14,396.05
Earmarked reserves	£ 20,500.00
Audit type	Annual
Auditor name	Victoria Waples

Introduction

The primary objective of internal audit is to review, appraise and report upon the adequacy of internal control systems operating throughout the council. To achieve this SALC adopt a predominantly systems-based approach to audit.

The council's internal control system comprises the whole network of systems established within the council to provide reasonable assurance that the council's objectives will be achieved, with reference to:

- the effectiveness of operations
- the economic and efficient use of resources
- compliance with applicable policies, procedures, laws, and regulations
- the safeguarding of assets and interests from losses of all kinds, including those arising from fraud, irregularity, and corruption
- the integrity and reliability of information, accounts, and data

Methodology

When conducting the audit, the internal auditor may:

- 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 2022/23 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		<i>Internal auditor commentary</i>
<i>Is the ledger maintained and up to date?</i>	Yes	The council uses al spreadsheet to produce reports on a Receipts and Payments basis and ensures that the financial transactions of the parish council are as accurate as reasonably practicable.
<i>Is the cash book up to date and regularly verified?</i>	Yes	The Responsible Financial Officer (RFO) has ensured that the cashbook is the focus for day-to-day accounting and is aware that the balancing off and reconciliation to the bank statement remains the most important control over the accounting system. The cashbook is reconciled on a monthly basis.
<i>Is the arithmetic correct?</i>	Yes	A number of spot checks were carried out and the functionality of the cashbook was found to be in order.
Additional comments:		

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		<i>Internal auditor commentary</i>
Have Standing Orders been adopted, up to date and reviewed annually?	Yes	The Council reviewed its Standing Orders at its meeting of 11 th May 2022 to take account of changes advised to Standing Order 18 and procurement thresholds. Those seen on the website are based on the Model Standing Orders produced by NALC in 2018 which take into account changes in legislation since those produced in 2013 and been adapted (where they are not statutory requirements) to ensure that they are relevant to the Parish Council.

<p>Are Financial Regulations up to date and reviewed annually?</p>	<p>Yes</p>	<p>Financial Regulations (FR) were also reviewed on 11th May 2022. Those produced are based on the NALC Model Financial Regulations 2019 with provisions included as outlined under LTN 87 - Procurement – March 2022. <i>Comment: at the next annual review, Council might wish to also review the Procurement Thresholds amendments (SI 2022/139) of the Public Contracts (Amendment) Regulations 2022 which came into force on 21st December 2022 and make the changes to the contract value limits from £25,000 to £30,000 for non-central government authorities. The contract value limits are to be calculated inclusive of VAT (effective from 1st January 2022).</i></p>
<p>Has the Council properly tailored the Financial Regulations?</p>	<p>No</p>	<p>The Council's Financial Regulations have not been fully tailored to the Parish Council as there is still the use of [square] sections and in particular those sections that do not apply to the Council. Recommendation: Council should ensure that its Financial Regulations are tailored to the parish council by removing the [square] sections as this creates confusion as to the intention and remove those that do not apply.</p>
<p>Has the Council appointed a Responsible Financial Officer (RFO)?¹</p>	<p>Yes</p>	<p>In accordance with Section 151 of the Local Government Act 1972(d) (financial administration), the Council has appointed a person (the Clerk) to be responsible for the administration of the financial affairs of the relevant authority as reconfirmed at the meeting of 11th May 2022. <i>Comment: It is noted that Councils FR 1.8 still contains the square brackets thereby creating ambiguity on the role carried out by the Clerk.</i></p>

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.

¹ Section 151 Local Government Act 1972 (d)

Evidence		Internal auditor commentary
Is there supporting paperwork for payments with appropriate authorisation?	Yes	At each relevant full Council Meeting a list of all payments is presented to the meeting with formal approval of such expenditure being shown in the minutes and evidence of such paperwork in the files submitted for internal audit. <i>Comment: the minutes also show payments made away from the meeting which are formally approved as retrospective payments at each relevant meeting.</i>
Where applicable, are internet banking transactions properly recorded and approved?	No	Internet banking is not operated by the Council apart from the use of direct debit to settle the council's debt with the Information Commissioner's Office.
Is VAT correctly identified, recorded, and claimed within time limits?	Yes	VAT is identified within the cashbook and claimed in accordance with the guidelines for local authorities and similar bodies. The outstanding year-end position of 854.11 was seen and verified against entries in the cashbooks. It is noted that this reclaim was submitted on 5 th April 2023. A claim for VAT refund covering the periods 1 st March 2021 to 31 st April 2022 in the sum of £574.50 was reviewed with confirmation seen that this was settled on 4 th April 2022.
Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ²	N/A	Council does not use the General Power of Competence.
Are payments under s.137 ³ separately recorded, minuted and is there evidence of direct benefit to electorate?	Yes	Payments made under this power for the year under review totalled £1,104.24 nett and were within statutory limits and deemed by the council to be of benefit to all or some of the community. <i>Comment: Section 144 of the Local Government Act 1972 allows the Parish Council to contribute to organisations encouraging persons to visit their area for recreation, health purposes trade fairs or exhibitions. The expenditure incurred for the Queen's Jubilee in the sum of £812.99 could have been allocated against this power.</i>

² Localism Act

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 £8.82 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

Where applicable, are payments of interest and principal sums in respect of loans paid in accordance with agreements?	N/A	The Council has no such loans.
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Section 4 – Risk management		
The internal auditor will expect to find evidence of the management of risks from identification of what those are for each individual Council through to how these will be managed and the controls in place to mitigate these and that these have been approved by the Council.		
Evidence		Internal auditor commentary
<i>Is there evidence of risk assessment documentation?</i>	Yes	The risk assessment statement submitted for Internal Audit provides details of the risks associated with the functioning of a smaller authority and the measures that the Council will undertake to mitigate such risks. The Risk Assessment for the year under review was adopted by full Council at its meeting of 8 th March 2023.
<i>Is there evidence that risks are being identified and managed?</i>	Yes	Council is aware that risk assessment needs to focus on the safety of the parish council's assets and in particular its money. There is evidence that overall the parish council has taken action to identify and assess those risks and has considered what actions or decisions it needs to take during the year to manage in order to avoid financial or reputational consequences.
<i>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?</i>	Yes	<p>Council has insurance in place under a specialist policy for local councils with Ansvar Insurance which shows core cover for the following: Public liability: £10million; Public/Products Liability: £10million and Fidelity Guarantee of £50thousand.</p> <p><i>Comment: Council's Fidelity Cover is within recommended guidance which states that cover should be equal to at least the sum of the year-end balances plus 50% of the precept/grants to be received in the following April/May.</i></p> <p>It was reported at the meeting of 22nd September 2022 that Council had carried out a full review of the levels of cover required with checks against the items listed on the asset register. The new premium being offered by a provider sourced by Community Action Suffolk in the sum of £590.36 was accepted by the Council with acknowledgement that this was an increase</p>

		<p>over the previous year due to market circumstances. It is noted that the new premium is on a 3-year long-term agreement.</p> <p><i>Comment: Council has noted that it is the responsibility of the whole Council to satisfy itself that insurances are adequate and that having identified, assessed and recorded the risks, appropriate measures, such as the appropriate use of insurance cover, have been taken to mitigate and manage the risk.</i></p>
<p><i>Evidence that internal controls are documented and regularly reviewed⁴</i></p>	<p>Yes</p>	<p>The Council has adopted an Internal Control Statement which was approved by full Council at its meeting of 22nd September 2022. The minutes of 10th November 2022 confirmed that an internal controls review was carried out and reported back to full Council at the meeting of 10th November 2022 with confirmation that the controls operated by the Council were in place and accurately recorded the risks being managed.</p> <p><i>Comment: In accordance with the Accounts and Audit Regulations 2015, Regulation 6, Council has shown that it is aware that it should formally review the effectiveness of its system of internal control to ensure that it has mitigation measures in place to address the risks associated with the management of public finances.</i></p>
<p><i>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 appointment⁵</i></p>	<p>Yes</p>	<p>The review of internal audit and its effectiveness is contained within the Internal Control Statement which was considered by the Council during the year under review at its meeting of 10th November 2022.</p> <p><i>Comment: by reviewing the terms of reference and effectiveness for internal audit, the council has followed guidance and demonstrated 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 - Regulation 5 of the Accounts and Audit Regulations 2015 refers.</i></p>

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

⁴ Accounts and Audit Regulations

⁵ Practitioners Guide

Evidence		Internal auditor commentary
Verify that budget has been properly prepared and agreed	Yes	The budget for the year 2022-2023 was formally approved at the Council meeting of 10 th January 2022 with the supporting papers detailing the budget being set - £15,080.
Verify that the precept amount has been agreed in full Council and clearly minuted	Yes	The precept was set at £15,080 for 2022/2023, as confirmed at the same meeting. <i>Comment: in accordance with guidance, Council might wish to demonstrate best practice by reflecting within the minutes the impact the precept being set will have upon a Band D property, as compared to the previous year.</i>
Regular reporting of expenditure and variances from budget	Yes	Finance reports are submitted to full Council detailing the actual performance against the budget during the year thereby allowing the council to take corrective action where necessary.
Reserves held – general and earmarked ⁶	Yes	At year-end Council's accounts show total reserves in the sum of £34,896.05 with general reserves in the sum of £14,396.05 with earmarked reserves in the sum of £20,500. <i>Comment: guidance as issued by Proper Practices 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). Council might wish to consider the adoption of a General Reserve Policy which would be used to assist the Council with a review into the level of general reserves to be adopted and held by the Council.</i>
Additional comments: Council has shown good practice by ensuring the recommended key stages as to the budgetary process are followed for the year and has ensured that progress against the budget is reviewed regularly throughout the year.		

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

Section 6 – income controls		
The internal auditor will seek evidence to ensure income is correct managed – recorded, banked, and reported and test mechanisms used to achieve this.		
Evidence		Internal auditor commentary
<i>Is income properly recorded and promptly banked?</i>	Yes	Income is recorded in accordance with Council's Financial Regulations. A number of items of income were cross checked against cash book and bank statement and found to be in order and recorded in accordance with Proper Practices.
<i>Is income reported to full council?</i>	Yes	Income received is reported to full Council and included within the Council's Financial Statements as submitted in accordance with Council's own Standing Orders. The RFO ensures that monies received are promptly banked.
<i>Does the precept recorded agree to the Council Tax Authority's notification?</i>	Yes	The council received precept of £15,080 during the year under review in April and September 2022. Evidence was provided showing a full audit trail from Precept being discussed, served on the Charging Authority to receipt of same in the Council's Bank Account.
<i>If appropriate, are CIL reporting schedules in accordance with the Regulations?⁷</i>	Yes	During the year under review, Council received CIL receipts totalling £7,505.48. The RFO has created an Earmarked Reserve for retained CIL balances.
<i>Is CIL income reported to the council?</i>	Yes	CIL receipts received are reported to full Council within the financial reports submitted to full Council.
<i>Does unspent CIL income form part of earmarked reserves?</i>	Yes	Council's annual accounts show that there is a retained balance of £6,484.91 which has been transferred into in an Earmarked Reserve specifically allocated, in accordance with the Regulations.
<i>Has an annual report been produced?</i>	Yes	The Annual CIL Statement has been produced and has been presented to full Council for approval and signature.
<i>Has it been published on the authority's website?</i>	Yes	The Annual CIL Statement has been uploaded to the 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
<i>Is petty cash in operation?</i>	N/A	The council does not operate a petty cash system.

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. The Internal Auditor will also review how payroll is managed including evidence of approval of payslips.		
Evidence		Internal auditor commentary
<i>Do all employees have contracts of employment?</i>	Yes	The council has 1 employee on its payroll at the period end of 31 st March 2023. Whilst employment contracts were not reviewed during the internal audit review, it was confirmed by the Clerk that a Contract of Employment is in place.
<i>Has the Council approved salary paid?</i>	Yes	All salary payments were authorised by the Council including the decision to implement the Nationally Agreed Pay Award (effective 1 st April 2022) as taken at the meeting of 10 th November 2022.
<i>Minimum wage paid?</i>	No	The minimum wage was not applied to the employee.
<i>Are arrangements in place for authorising of the payroll and payments to the council? Does this include a verification process for agreeing rates of pay to be applied?</i>	Yes	There were 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.
<i>Do salary payments include deductions for PAYE/NIC? Is PAYE/NIC paid promptly to HMRC?</i>	Yes	The payroll function for the year under review is operated in accordance with HM Revenue and Customs guidelines and outsourced to Suffolk Association of Local Councils. There were no application payments due to HM Revenue and Customs during the year under review.

<i>Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation?⁸</i>	Yes	Re-Declaration of Compliance under the Pensions Act was carried out in November 2022 as seen from the paperwork submitted for internal audit.
<i>Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?</i>	Yes	All expenses / payments made are against itemised invoices submitted to and approved by full Council.

Section 9 – Asset control		
The Internal Audit will be seeking to establish if there is a list of assets in accordance with proper practices including the date of acquisition, location, and value. This extends to checking policies (with evidence of review) and that the Council has applied the documented approach in practice. The Internal Auditor will check not only valuation processes but the existence of reserve budgets for depreciation and adequacy of insurance. A clear audit trail should be available when items are purchased including minutes to evidence approval.		
Evidence		Internal auditor commentary
<i>Does the Council maintain a register of material assets it owns and manage this in accordance with proper practices?⁹</i>	Yes	The Asset Register was reviewed during the Internal Audit Visit for year-end and reflects those items listed under insurance and within the Parish Council's remit for maintenance and ownership. It is noted that the declared value for all assets at year-end on the Statement of Accounts for 31 st March 2023 is stated as £84,040 (rounded) which matches the Register value of £84,039.91.
<i>Is the value of the assets included? (Note value for insurance purposes may differ)</i>	Yes	Council has shown that it is mindful of the guidance within the Governance and Accountability for Smaller Authorities in England March 2022 on the valuation of its assets and has ensured that where the acquisition value of the asset at the time of first recording is used, that method of valuation has been consistently applied.
<i>Are records of deeds, articles, land registry title number available?</i>	N/A	Records of deeds, articles, land registry title number were not reviewed during the internal audit which was carried out via remote means.
<i>Is the asset register up to date and reviewed annually?</i>	Yes	The figures on the Accounting Statements of the AGAR were signed off at the meeting in May 2023 following a review of the asset register at the time of insurance renewal.

⁸ The Pension Regulator – [website click here](#)

⁹ Practitioners Guide

<i>Cross checking of insurance cover</i>	Yes	Council has insurance under all risks cover for its assets as per the insurance schedule seen with specific cover for two quoted items.
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Section 10 – bank reconciliation		
The internal auditor will seek to establish that the Council understands and can evidence good practice and internal control mechanisms in relation to bank reconciliation.		
Evidence		Internal auditor commentary
<i>Is bank reconciliation regularly completed and reconciled with the cash book and cover every account?</i>	Yes	Evidence was seen showing that bank reconciliations were completed during the year and reconcile with the cash sheets. Overall there is reporting of bank balances within the financial reports submitted at each relevant meeting. <i>Comment: Council is aware that, in accordance with Proper Practices, the bank reconciliation is a key tool for management as it assists with the regular monitoring of cash flows which aids decision-making, particularly when there are competing priorities.</i>
<i>Do bank balances agree with bank statements?</i>	Yes	Bank balances agree with the period end statements and, as at year end (31 st March 2023), the balance across the councils accounts stood at £134,496.05 as recorded in the Accounting Statements of the AGAR.
<i>Is there regular reporting of bank balances at Council meetings?</i>	Yes	The minutes show that bank reconciliations are given within the Financial Reports are received and accepted at each meeting. <i>Comment: Council has implemented a system whereby an appointed Councillor signs the reviewed bank reconciliation and reports back to Council that this has been undertaken. This is good practice as it not only protects the RFO but also fulfils an internal control function.</i>

Section 11 – year end procedures		
Evidence		Internal auditor commentary

<i>Are appropriate accounting procedures used?</i>	Yes	Accounts are produced on a receipts and expenditure basis, and all found to be in order.
<i>Financial trail from records to presented accounts</i>	Yes	The end of year accounts were presented for the internal auditor review and there is a clear financial trail from records to presented accounts.
<i>Has the appropriate end of year AGAR¹⁰ documents been completed?</i>	Yes	As Council is a smaller authority with gross income and expenditure not exceeding £25,000 it has completed the Annual Governance and Accountability Return Form 2 which was approved at the meeting of 10 th May 2023.
<i>Did the Council meet the exemption criteria and correctly declared itself exempt?</i>	N/A	As the Parish Council had gross income and expenditure exceeding £25,000 it was not able to declare itself exempt from a limited assurance review for the year 21/22.
<i>During the period in question did the small authority demonstrate that it correctly provided for the exercise of public right as required by the Accounts and Audit Regulations 2015?</i>	Yes	The internal auditor is able to verify that the council ensured the period for the exercise of elector's rights during Summer 2022 was in accordance with the period specified within the Accounts and Audit Regulations 2015. Dates set were 13 th June to 22 nd July 2022.
<i>Have the publication requirements been met in accordance with the Regulations?¹¹</i>	Yes	The Council has complied with the requirements of the Accounts and Audit Regulations 2015 for smaller authorities with income and expenditure exceeding £25,000 for the year ending 31 st March 2022 and published the following on a public website: Annual Internal Audit Report Section 1 – Annual Governance Statement of the AGAR Section 2 – Annual Accounting Statements of the AGAR – audited figures Notice of the period for the exercise of public rights Section 3 – External Auditor's Report and Certificate Conclusion of the Audit

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.	

¹⁰ Annual Governance & Accountability Return (AGAR)

¹¹ Accounts and Audit Regulations 2015

Evidence		Internal auditor commentary
<i>Has the Council considered the previous internal audit report?</i>	Yes	The Internal Audit Report for the period ending 31 st March 2022 was formally noted and considered at the meeting of 11 th May 2022.
<i>Has appropriate action been taken regarding the recommendations raised?</i>	Yes	The following recommendation was raised in the internal audit report for the period ending 31 st March 2022. <ol style="list-style-type: none"> 1. Compliance with responsibility as an employer and submit re-dec of compliance. 2. Review of AGAR cross ref Box 2 and 3 The minutes of 12 th July 2022 confirm that an action plan was submitted by the Clerk to address the comments made along with the recommendations at the meeting of 6 th July 2022.
<i>Has the Council confirmed the appointment of an internal auditor?</i>	Yes	SALC were appointed as the Council's internal auditors for the year ending 31 st March 2023 at the meeting of 11 th May 2022. <i>Comment: Council has understood the requirement to ensure that it has a clear understanding of the roles and responsibilities for internal audit, audit planning and timing of visits, reporting requirements; access to information; period of engagement and remuneration.</i>

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
<i>Has the Council considered the previous external audit report?¹²</i>	No	Whilst the External Audit, having been received in late July 2022, was circulated to all Councillors, there is no minute reference to confirm that Council considered the report from the External Auditor for the year ending 31 st March 2022.

¹² Regulation 20 Accounts and Audit Regulations 2015 – *following completion of an audit the Council should note that it is the Council as a whole (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.*

		<p>Recommendation: Council should note Regulation 20 (in part) of the Accounts and Audit Regulations 2015 states that the annual audit letter received from the auditor must be considered by the authority as a whole.</p> <p>The Notice of Conclusion was seen on the Council's website.</p>
<p><i>Has appropriate action been taken regarding the comments raised?</i></p>	<p>Yes</p>	<p>There were no matters which come to the attention of the external auditor which have cause for concern that relevant legislation and regulatory requirements had not been met and the following comment raised by the external auditor is noted: The AGAR was not accurately completed before submission for review. The AGAR had to be sent back for amendment.</p>

<p>Section 14 – additional information</p> <p>The internal auditor will look for additional evidence of good record keeping, compliance with data protection regulations, freedom of information and website accessibility regulations.</p>		
<p>Evidence</p>		<p><i>Internal auditor commentary</i></p>
<p><i>Was the annual meeting held in accordance with legislation?</i> ¹³</p>	<p>Yes</p>	<p>Council held its Annual Meeting of the Parish Council at which the Chair was elected on 11th May 2022 in accordance with legislation in place at that time.</p>
<p><i>Is there evidence that Minutes are administered in accordance with legislation?</i> ¹⁴</p>	<p>Yes</p>	<p>Council is aware that that under LGA 1972 schedule 12, paragraphs 41(1) and 44 the draft minutes of a meeting should be formally approved (with any necessary amendments) at the next meeting.</p> <p><i>Comment: Council is aware that, in accordance with legislation, loose leaf minutes should be numbered consecutively and signed by the Chair of the meeting on each page.</i></p> <p>At the meeting of 10th May 2022, the Council resolved to readopt the Suffolk Code of Conduct for the purposes of discharging its duty to promote and maintain high standards of conduct within its area.</p>

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

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

		<i>Comment: it is noted that the minutes reflect that the Council intended to adopt the new Councillor Code of Conduct once the new NALC code is available. It is unclear from the minutes as to whether the Council has adopted the 2020 Councillor Code of Conduct.</i>
<i>Is there a list of members' interests held?</i>	Yes	Evidence was seen on the Council's website for the Register of Interests for all current Parish Councillors. <i>Comment: Council should be aware that whilst the monitoring officer of the District Council must arrange for the parish council's register of members' interests to be available for inspection in the district and must be published on the district council's website, where the parish council has its own website, its register of members' interests must also be published on that website or a link providing access to the District's website. (Openness and transparency on personal interests - A guide for councillors – August 2012)</i>
<i>Does the Council have any Trustee responsibilities and if so, are these clearly identified in a Trust Document?</i>	N/A	Council does not have any such responsibilities.
<i>Has the Transparency Code been correctly applied, and information published in accordance with current legislation?</i>	Yes	Council is aware that with gross income and expenditure under £25,000 it will be required to follow the Local Government Transparency Code 2014 for smaller authorities. Council has ensured that the following are published on a public website in accordance with the dates prescribed by the relevant regulations (not later than 1 July): Internal Audit Report; List of Councillors and Responsibilities; Items of Expenditure Above £100 including recoverable and non-recoverable VAT; End of Year Accounts; Annual Governance Statement; Asset Register and that Agendas of Meetings; Associated Papers and Minutes should be published in accordance with the prescribed timescales as set out in the Transparency code for smaller authorities – December 2014
<i>Has the Council registered with the Information Commissioner's Office (ICO)?¹⁵</i>	Yes	The council is correctly registered with the ICO as a Data Controller in accordance with legislation. Certificate number ZA129944 with an expiry date of 19 th July 2023 refers.
<i>Is the Council compliant with the General Data Protection Regulation requirements?</i>	Yes	Council has taken active steps to ensure compliancy with the GDPR requirements and has adopted a number of GDPR Policies during the year

¹⁵ Data Protection Act 2018

		that provides clear responsibilities and obligations of the Council in respect of the collecting, using and protecting of personal information.
<i>Has the Council published a website accessibility statement on their website in line with Regulations?¹⁶</i>	Yes	There is a website accessibility statement available to view on the parish council website which details the technical information for the website are given along with the methods used for testing the website; steps being taken to improve accessibility and how the site is being improved to ensure that content meets the WCAG 2.1 Standard under Regulation 8 of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.
<i>Does the council have official email addresses for correspondence?¹⁷</i>	Yes	Council operates with an “hpc.gmail” address for the Clerk, which is not linked to a personal email address but over which the council has no control. <i>Comment: Council is considering the use of a secure e-mail system with a gov.uk address thereby identifying that it has local government status and demonstrating authenticity when building trust and credibility with the public. Such an address would be owned by the parish council and would be set up once a new Clerk is appointed.</i>
<i>Is there evidence that electronic files are backed up?</i>	Yes	Council uses a system whereby a back-up of the council’s data is taken and stored appropriately.
<i>Do terms of reference exist for all committees and is there evidence these are regularly reviewed?</i>	N/A	Council does not operate a committee system.

Signed: *U S Waples*

Date of Internal Audit Review: 26.05.23 & 01.06.23

Date of Internal Audit Report: 01.06.23

On behalf of Suffolk Association of Local Councils

¹⁶ Website Accessibility Regulations 2018

¹⁷ Practitioners Guide