

Report to Stanton Parish Council

Internal Audit of the Accounts for the Period Year Ending 31st March 2024

The primary objective of Internal Audit is to independently review, appraise and provide assurance upon the control environment, making sure that controls are mitigating the Council from increased risk exposure, and to achieve this, the internal auditor will adopt a predominantly systems-based approach to audit.

The Accounts for the year ending 31st March 2024 can be summarized as follows:

Income for year:	£87,808.25
Expenditure to date:	£80,955.69
Precept figure:	£71,010.00
General Reserves:	£80,818.34
Earmarked Reserve:	£-

The following Internal Audit work was conducted on the adequacy of systems of internal control in accordance with the scope previously approved by the Council with particular emphasis upon the following:

- Review and assess the soundness, adequacy, effectiveness and reliability of financial and performance management systems
- Review and assess the efficiency and effectiveness of internal control arrangements and working practices and make recommendations to improve these where appropriate
- Review and assess the adequacy of procedures to ensure the Council's assets and interests are adequately protected and risks are identified and effectively managed
- Check for compliance with legislation and the Council's integrity and ethical standards, policies and procedures

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Comments and any recommendations arising from the review are made below.

Subject & tests conducted	Comments/Recommendations
<p>1. Proper book-keeping. Examination of</p> <ul style="list-style-type: none"> • Cashbook • Reconciliations of cashbook 	<p>The Council uses the Scribe Accounting Financial Package which is a purpose-built accounting system for town and parish councils and is able to produce reports on a receipts and payments basis. Cash books are reconciled on a monthly basis.</p> <p>Council continues to follow Proper Practices in ensuring that its accounting procedure gives a more accurate presentation of an authority's true financial position by focusing on the balance of economic benefits that it has under its control, rather than just its bank balance and the Responsible Financial Officer (RFO) has used the full suite of accounting and reporting tools associated with the package to produce clear financial management information to the Council on both a monthly and annual basis.</p> <p><i>Comment: Council follows Proper Practices in ensuring that its accounting procedure gives a more accurate presentation of an authority's true financial position by focusing on the balance of economic benefits that it has under its control, rather than just its bank balance.</i></p>
<p>2. Payment controls. Examination of:</p> <ul style="list-style-type: none"> • Understanding of the process involved for reclaiming VAT • Expenditure controls • Internal Banking controls • Procurement controls • s137 payments • Loans 	<p>VAT is identified in the cash book and the reclaims for the first three quarters were seen and verified with settlement evidence in the council's banking statements. The year-end balance stands at £230.84 Evidence of the claim submitted was seen as produced by the accounting package operated by the RFO.</p> <p>A selection of random payments were cross checked against payment authorisation slips, cash book, bank statement and invoices and all were found to be recorded/ authorised in accordance with Proper Practices. A further spot check of items paid via the BACS/Direct Debit system from the Council's Accounts were cross checked against cashbook, bank statements and invoices. All were found to be in order. A spot check of payments made under contractual terms were further analysed and all were found to be in accordance with agreed schedules and sums approved.</p> <p><i>Comment: for clarity and transparency each invoice shows at which council meeting the payment was authorised, is dated with a minute reference, details the creator of the payment, how it was paid, date it was paid and the second authoriser details.</i></p> <p>Council has implemented a two-tier security system for payments which are settled by the BACS system. The system ensures that the instructions for each payment are signed by one of three authorised bank signatories and that the RFO is the creator of the payments.</p> <p><i>Comment: This not only protects the RFO but fulfils an internal control objective to ensure the</i></p>

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	<p><i>safeguarding of public money.</i></p> <p>Council follows good practice by ensuring that, on receipt of invoices, verification that the relevant goods or services have been received is obtained and invoices checked to ensure that the arithmetic is correct, agreed discounts have been deducted and everything is acceptable regarding reclaiming the VAT.</p> <p>Payments made under the LGA 1972 s137 power for the year under review totalled £850.00 and were within statutory limits and deemed to be of benefit to those living in the area. <i>Comment: the Council operates the grants or donations within the remit of the eligibility criteria ensuring that the statutory limit (£9.93 per elector) is adhered to and the expenditure is on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitant.</i></p> <p>Council has an outstanding public works loan (PW497025) which showed a balance of £112,581.56 at 31st March 2024. It is confirmed that this is the figure to be used at Box 10 on the Accounting Statements of the Annual Governance and Accountability Return (AGAR). Payments of interest and principal sums in respect of loans were paid in accordance with agreements on 26th April and 26th October 2023 and totalled £20,129.82 for the year under review. This figures has been correctly recorded at Box 5 of the Accounting Statements of the AGAR.</p>
<p>3. Standing Orders & Financial Regulations Examination of:</p> <ul style="list-style-type: none"> • Compliance • Annual Review • Adherence • Appointment of Responsible Financial Officer 	<p>The Standing Orders, as seen on the Parish Council's website shows an adopted date of 11th May 2023 and are based on the latest model published by the National Association of Local Councils (2018) with appropriate amendments. These were however due to be reviewed at the meeting 9th May 2024 to ensure that they are compliant with legislation and have been adapted (where they are not statutory requirements) to ensure that they are relevant to the Parish Council. <i>Comment: Council is aware of the requirement to ensure that the SOs are fully tailored to the council and that in accordance with proper practices they need to be regularly reviewed, fit for purpose and adhered to. Council might also wish to note the Procurement Thresholds amendments (SI 2022/139) of the Public Contracts (Amendment) Regulations 2022 which came into force on 21st December 2022 (see below).</i></p> <p>Financial Regulations (FR), as seen on the Council's website show a review date of 11th May 2023 and 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</i></p>

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	<p><i>be calculated inclusive of VAT (effective from 1st January 2022).</i></p> <p>The Council, in accordance with proper practices and with reference to section 151 of the Local Government Act 1972, has employed a Responsible Financial Officer (RFO) who is responsible for the financial administration of the authority.</p>
<p>4. Risk Management.</p> <ul style="list-style-type: none"> • Annual Review and Minuted • Review of risks associated with <ul style="list-style-type: none"> ➤ Financial Management ➤ Cemetery ➤ Building/ Assets • Fidelity Guarantee Cover Insurance <ul style="list-style-type: none"> ➤ Adequate ➤ Reviewed • Internal Controls documented and regularly reviewed • Insurance Policy reviewed, cover appropriate and adequate 	<p>The risk assessment documentation 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 documentation, for the year under review, will be presented to council at its meeting of 9th May 2024 as one formal document which will also contain revised standing orders; financial regulations, code of conduct and the statement of internal control.</p> <p>The documentation seen demonstrates that council is aware that its risk assessment needs to focus on the safety of the parish council’s assets and in particular its money, it needs to demonstrate on an annual basis that it has taken actions to identify and assess those risks and that it has considered what actions or decisions it needs to take during the year to manage in order to avoid financial or reputational consequences.</p> <p><i>Comment: whilst there is evidence that overall the council has reviewed the risks associated with the functioning of a smaller relevant body, council is advised to ensure that this is minuted and evidenced during the year under review to allow a positive response to Assertion 5 – Risk Management.</i></p> <p>A review of the Council’s financial risk assessment documentation shows that there are in place specific control procedures for payments made by direct bank transfer, which, if reviewed on a regular basis, will provide reassurance that the Council has taken steps to identify, assess and record risks associated with actions and decisions it has taken or considered taking during the year that could have financial or reputational consequences.</p> <p><i>Comment: Council has noted that in accordance with Regulation 6 of the Accounts and Audit Regulations 2015, it should conduct a formal review of its system of internal control and should have in place monitoring documents which would identify the risks involved with and the potential for improvements to its arrangements to protect public money. Council is advised to consider regular reviews by a non-signatory, thereby separating the roles of overview from that of authorisation, of 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>Whilst Council is operating within the provisions of the draft internal control statement to be presented to council at its meeting of 9th May 2024, there is no formal evidence (via a minute</p>

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	<p>reference) to reflect that Council formally reviewed the effectiveness of its review its internal controls for the year 2023 – 2024 within the year under review. <i>Comment: whilst the Council has considered specific control procedures for payments by bank transfer or other electronic means and a process and mitigating action to protect the Council against payment of invoices which may show fraudulent bank account details, Council needs to undertake a formal review of its Control Statement and associated the documentation to demonstrate that it has taken steps to identify, assess and record the control mechanisms in place to ensure that all reasonable steps are taken to safeguard and protect public finances. Proper practices states that this should be done annually.</i></p> <p>Council’s Insurance Document was seen during the time of internal audit and the following were verified: Public / Products liability cover is £10million, Employer’s Liability cover is £10million and Fidelity Guarantee is £250thousand. <i>Comment: Fidelity Guarantee (Employee’s Dishonesty) cover at £500,000 is in accordance with guidance, which provides that the cover should be at least the sum of the year-end balances plus 50% of the precept/grants to be received in the following April/May. Council has ensured that balances and cash flow are monitored to ensure that cover is appropriate as balances increase.</i></p> <p>Premises cover is shown for two identified buildings with all risk cover for items listed under generic headings for those located within the boundaries of Stanton. <i>Comment: in accordance with Proper Practices, Council has identified its key risks and taken steps to manage them in a way which it can justify to a level which is tolerable by transferring the risk and buying in services from specialist external bodies and taking out insurance. Overall Council has understood the requirement to have in place safe and efficient arrangements to safeguard public money.</i></p> <p>Recommendation: noting 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, council might wish to formally record via a minute reference that it has taken such action to mitigate and manage such risks.</p>
<p>5. Budgetary controls. Examination of:</p> <ul style="list-style-type: none"> • Verification of process of setting of budget • Monitoring of budget • Reserves 	<p>Full Council approved the budget for 2023-2024 at its meeting of 8th December 2022. From paperwork seen on the website it is noted that the revenue budget set in the sum of £79,010 would be funded by the precept. <i>Comment: whilst Council is aware that the preparation of an annual budget is one of the key statutory tasks to be undertaken by an authority, for clarity and transparency it should ensure that the level of budget is clearly evidenced in the Council’s minutes. Council is also advised to ensure that the minutes show the actual figures being approved so that there is clarity on the</i></p>

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	<p><i>budget, precept and implications for Band D Council Tax.</i></p> <p>A review of the budget including detailed income and expenditure position is reported to council in accordance with Council’s own Standing Orders. Evidence was seen of budget report to actual with committed expenditure and funds available breakdown. At the monthly meetings, the RFO provides expenditure breakdown by heading to full Council which ensures detailed information is received for currently funded projects.</p> <p><i>Comment: Council shows good practice by following the recommended key stages as to the budgetary process to be followed for the year:</i></p> <ul style="list-style-type: none"> • <i>decide the form and level of detail of the budget;</i> • <i>review the current year budget and spending;</i> • <i>determine the cost of spending plans;</i> • <i>assess levels of income;</i> • <i>bring together spending and income plans;</i> • <i>provide for contingencies and consider the need for reserves;</i> • <i>approve the budget;</i> • <i>confirm the precept or rates and special levies; and</i> • <i>review progress against the budget regularly throughout the year.</i> <p>The Council, as at 31st March 2024, had overall reserves totalling £80,818.34 with none allocated as earmarked reserves.</p> <p><i>Comment: Council should be aware of the guidance as issued by Proper Practices which states that it is regarded as acceptable for a council’s general (non-earmarked revenue) reserves to be equal to 3 to 12 months of Net Revenue Expenditure and should ensure that the level of general reserves adopted is in accordance with its General Reserve Policy. There is no upper limit for Earmarked Reserves, but they should be held for genuine and intended purposes and their level subject to regular review and justification (at least annually).</i></p> <p>Recommendation: Council should note guidance as issued under the Practitioners Guide March 2024 which states that an authority needs to adopt, as a general reserve policy, the level of reserves that are appropriate to their size, situation, risks and plan their budget so as to ensure that the adopted level is maintained. Council should have in place a General Reserve Policy and have reviewed the level and purpose of any set earmarked reserves.</p>
<p>6. Income controls. Examination of:</p> <ul style="list-style-type: none"> • Precept • Other income • Debtors 	<p>Council received precept in the sum of £71,010 from West Suffolk District Council for the year in April 2023 as reported to full council within its financial reports at its meeting in May 2023. Evidence was provided showing a full audit trail from precept being discussed and approved to being served on the Charging Authority to remittance advice showing the precept to be paid and receipt of same in the Council’s Bank Account. The precept was approved at the meeting of 27th</p>

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	<p>October 2022 with the minutes providing clarity and transparency in the recording of the amount being set and the impact that this would have overall which was a 3.7% reduction on the previous year.</p> <p>The precept for the year 2024 – 2025 was discussed and approved at the meeting of 11th January 2024 and set at the same level as that for the previous year. <i>Comment: council might wish to note best practice which advises that the minutes should be expanded to reflect the increase per household per year and the ensuing Band D Property Tax Bill for the coming year.</i></p> <p>Spot checks on further items paid under BACS / Direct Credit into the council's accounts were cross checked against cashbook, bank statements and invoices raised by the parish council. All were found to be in order with a clear underlying audit trail. Income received is reported to full council within the financial reports submitted at each meeting.</p> <p>It was confirmed that burial fees were reviewed in August 2023 with new fees and charges being implemented from 1st September 2023 and that there is a formal burial register showing details of payments for interments and memorials with fees being charged at the correct approved rate and recovered in a timely manner. Fess for additional inscriptions, effective March 2024 were also approved at the 8th February 2024 meeting.</p>
<p>7. Payroll controls. Examination of:</p> <ul style="list-style-type: none"> • Management of payroll • PAYE/NIC system in place • Compliance with HMRC procedures • Records relating to contracts of employment • Compliance with Pensions Duties • Treatment of expenses 	<p>At the period end Council had three employees on its payroll, none of which were members of a pension scheme.</p> <p>Whilst the payroll function for the year under review was carried out inhouse, it is confirmed that effective April 2024, SALC have been contracted to carry out this function.</p> <p>Cross-checks on the year under review were completed on a sample of payments covering salary and PAYE and were all found to be in order and operated in accordance with HM Revenue and Customs guidelines. In accordance with Proper Practices, PAYE taxes and employee and employer National Insurance contributions (NIC) are calculated and recorded for every employee. Deductions are paid to HM Revenue and Customs and Essex County Council on or before the dates prescribed.</p> <p>It is confirmed that the NJC pay award as outlined in E01-23 Local Government Services Pay Agreement 2023 has been applied to the relevant staff member as well as former clerks in post at the time the pay award became effective. <i>Comment: There are robust payroll arrangements in place which ensures the accuracy and legitimacy of payments of salaries and wages, and associated liabilities and as such the Council</i></p>

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	<p><i>has complied with its duties under employment legislation.</i></p> <p>Salaries are paid in accordance with contracted hours worked for office staff and labour with overtime being approved at each relevant meeting. It is noted from the minutes that quarterly reviews are to be conducted to ensure the hours being worked by the Clerk are appropriate and commensurate with the duties of the Clerk/RFO. Council is advised to ensure that budgetary processes take account of changes to employment contracts and relevant adjustments made during the year.</p> <p>During the year, agreement was forthcoming for a review of the wages paid to two of the council’s staff with agreement that remuneration should be in accordance with either a spinal column point on the NJC pay scale or the applicable minimum wage. Contracts have been updated to reflect these amendments.</p> <p><i>Comment: in accordance with Proper Practices, Council has ensured that the remuneration payable to all employees has been approved in advance by the Council.</i></p> <p>Council is aware of its pension responsibilities with evidence seen of the redeclaration of compliance with the Pensions Regulator dated 16th April 2024 (council’s re-enrolment dates was 16th March 2023). The total number of staff declared within the return was three.</p> <p><i>Comment: Council is aware that every three years an employer must put certain staff back into a pension scheme. This is known as ‘re-enrolment’. This is an employer’s legal duty and Council’s must let the Pension Regulator know when they have completed the task by completing and submitting a re-declaration of compliance.</i></p>
<p>8. Petty cash/expenses procedure.</p>	<p>Council does not operate a system of petty cash.</p>
<p>9. Bank reconciliation. Examination of:</p> <ul style="list-style-type: none"> • Reconciliations • Cashbook • Bank Statements 	<p>Bank reconciliations are completed on a regular basis and reconcile with the cash sheets. Overall there is regular reporting of bank balances within the detailed financial reports submitted to the council.</p> <p><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 flow which aids decision-making, particularly when there are competing priorities. In accordance with Proper Practices.</i></p> <p>Council has followed Proper Practices which state that bank reconciliations should be prepared routinely, subject to independent scrutiny and signed by members. Section 5.18 states that “It is a requirement of the current model financial regulations that bank reconciliations be prepared regularly, approved by members and signed as part of the regular minute record”.</p> <p><i>Comment: in considering the benefits of implementing a system whereby the Chair independently</i></p>

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	<p><i>reviews the bank reconciliation and confirms, via a minute reference, that such a review has taken place is not only good practice but is also a safeguard for the RFO and fulfils one of the authority's internal control objectives.</i></p> <p>Reconciled bank balances as at 31st March 2024 agree with the year-end bank statements and the data obtained from the financial accounting system used by the RFO and stand at £80,818.34. <i>Comment: the internal auditor is able to verify the year-end bank reconciliation detail and can ensure that the combined cash and bank balances as identified are included within the AGAR, section 2, line 8.</i></p>
<p>10. Asset control. Examination of:</p> <ul style="list-style-type: none"> • Asset Register • Checks on existence of assets • Recording of fixed asset valuations • Cross checking on insurance cover 	<p>The Asset Register for year-end reflects those items listed under insurance and within the Parish Council's remit for maintenance and ownership. The Asset Register currently stands at £288,276.67 which takes into account disposals during the year under review. The minutes of 8th February 2024 agreed amendments to the register in terms of disposals, working "life" periods and style of content. A number of assets have been stated as at the Insurance Value and where assets have been gifted or where there is no known value have been given the proxy value of £1. <i>Comment: Council follows the requirements for smaller authorities to record each asset at its original purchase cost or were the original purchase cost is unknown at the time of first recording on the asset register, a current value is recorded, which acts as a proxy value to the original cost and will remain unchanged until disposal.</i></p> <p>From a review of the asset register alongside the insurance cover provided, confirmation is given of the overall adequacy of cover of insurance for the ensuing year. Appropriate insurance is in place under generic category headings based on policy declared values.</p>
<p>11. Internal Audit: Examination of:</p> <ul style="list-style-type: none"> • Reporting of Previous Internal Audit Reports • Review of internal audit • Appointment of internal auditor 	<p>The Internal Audit Report for the period ending 31st March 2023 was formally considered and approved by the Parish Council at the meeting of 11th May 2023 at which the Clerk was authorised to conduct necessary actions in accordance with the recommendations raised within the report.</p> <p>The following recommendations as raised in the internal audit report for the period ending 31st March 2023 have been / are in the process of being implemented:</p> <ol style="list-style-type: none"> 1. Internal controls for the management of the council's payments and separation of duties 2. Publication of the notice of conclusion of the prescribed dates. <p>An update to the matters raised within the internal audit report dated 10th August 2023, confirms that the council has now implemented two-factor authorisation for online payments. <i>See payments above.</i></p> <p>In accordance with the Accounts and Audit Regulations 2015, the Parish Council formally reviewed the scope and effectiveness of its internal audit arrangements at the meeting at which</p>

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	<p>the independent internal auditor was appointed for the year under review. Mrs Waples was appointed to act as the parish council’s independent internal auditor, for the year 2023-2024 at a meeting of full Council of 8th February 2024.</p> <p><i>Comment: Council has understood the requirements, under proper practices, that it should have in place a letter of engagement detailing roles and responsibilities for internal audit, audit planning and timing of visits, reporting requirements; access to information; period of engagement and remuneration.</i></p>																		
<p>12. External Audit Examination of:</p> <ul style="list-style-type: none"> • Reporting of External Audit Report • Publication requirements 	<p>The External Auditor’s Certificate and Report for the year ending 31st March 2023 was considered by the Parish Council at its meeting of 7th September 2023. A review of the External Audit Certificate on the Council’s website notes that “information has come to the attention of the external auditor that the notice of conclusion was not published by the dates specified in the accounts and audit regulations 2015”. It is further noted that whilst the council had confirmed that it had not complied with Assertion 7 in Section 1, it had provided the external auditor with an adequate explanation of non-compliance and details of the actions being undertaken to address weaknesses identified.</p> <p>In accordance with the Accounts and Audit Regulations 2015, as a smaller authority with either income or expenditure exceeding £25,000 but not exceeding £6.5 million, it is confirmed that the Council did comply with the requirements of the Accounts and Audit Regulations 2015 for the year ending 31st March 2023.</p>																		
<p>13. Year-end procedures. Examination of:</p> <ul style="list-style-type: none"> • Appropriate accounting procedures used • Bank Statements and Cash Book agree • Has the appropriate end of year Annual Governance and Accountability Return (AGAR) documentation been completed? • Where an authority certified itself exempt in 2022/23 did it met the exemption criteria and correctly declared itself exempt? • Was there the opportunity provided for the exercise of electors’ rights during Summer 2023? • Have the publication requirements been met in accordance with the Audit & Accounts Regulations of 2015. 	<p>Accounts are produced on a receipts and payments basis. All were found to be in order. There is an underlying financial trail from financial records to the accounts produced.</p> <p>As the Council is a smaller authority with gross income and expenditure exceeding £25,000 but not exceeding £6.5million it will be required to complete Part 3 of the AGAR.</p> <p>The Annual Governance and Accountability Return (AGAR) to be presented to full Council for approval was examined and the following figures agree with those submitted by the RFO for inclusion in Section 2 Accounting Statements 2023 – 2024 (rounded for purposes of the Return): <i>it is upon these figures that the internal audit review was completed.</i></p> <table border="1" data-bbox="814 1258 1797 1481"> <tr> <td>Balances brought forward (01.04.23)</td> <td>Box 1</td> <td>73966</td> </tr> <tr> <td>Annual Precept 2023/24</td> <td>Box 2</td> <td>71010</td> </tr> <tr> <td>Total Other Receipts</td> <td>Box 3</td> <td>16798</td> </tr> <tr> <td>Staff Costs</td> <td>Box 4</td> <td>22660</td> </tr> <tr> <td>Loan Interest / Capital Repayments</td> <td>Box 5</td> <td>20130</td> </tr> <tr> <td>Total Other Payments</td> <td>Box 6</td> <td>38166</td> </tr> </table>	Balances brought forward (01.04.23)	Box 1	73966	Annual Precept 2023/24	Box 2	71010	Total Other Receipts	Box 3	16798	Staff Costs	Box 4	22660	Loan Interest / Capital Repayments	Box 5	20130	Total Other Payments	Box 6	38166
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Balances Carried Forward	Box 7	80818
Total Cash and Investments	Box 8	80818
Total Fixed Assets (<i>as amended</i>)	Box 9	288277
Total Borrowings	Box 10	112581

As the Council was a smaller authority with gross income and expenditure exceeding £25,000 during the year 2022/2023, it was not able to certify itself as an exempt authority.

It is noted that for the year 2022-2023, Council correctly provided for the exercise of elector’s rights during Summer 2023 and whilst the dates set were in accordance with the period specified within the Accounts and Audit Regulations 2015; 26th June to 4th August 2023, the date of the notice (21st June 2023) was more than 1 day before the commencement date of 26th June 2023.
Comment: Council has followed guidance on the setting of the dates and ensured that the date of notice is as per instructions which state that the date of placing of the notice must be not less than 1 day before the date upon which the period commences.

The Council has complied with the requirements of the Accounts and Audit Regulations 2015 for smaller authorities with income and expenditure not exceeding £25,000 and published the following for the year 2022/23 on a publicly accessible website:

- Annual Internal Audit Report of the AGAR
 - Section 1 – Annual Governance Statement of the AGAR
 - Section 2 – Accounting Statements of the AGAR
 - Notice of the period for the exercise of public rights and other information required by Regulation 15 (2), Accounts and Audit Regulations 2015.
 - Conclusion of the audit
 - Section 3 – The External Auditor Report and Certificate
 - Sections 1 and 2 of the AGAR including any amendments as a result of the limited assurance review.
- Comment: Council might wish to note that there is a requirement to ensure that the audited Sections 1, 2 and 3 remain available for public access for a period of not less than 5 years from the date of publication.*

14. Transparency Code.

Examination of:

- **Transparency code requirements**

To ensure full compliance with the requirements of the Local Government Transparency Code 2015 (for those with annual turnover exceeding £200,000), Council should be aware of the following publication timescales:
quarterly: individual items of expenditure that exceed £500 (currently published on an annual basis); Government Procurement Card transactions; Invitations to tender for contracts over £5,000; Details of contracts that exceed £5,000;

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	<p>annually: details of all land and building assets; Grants to Voluntary, Community and Social Enterprise Organisations; Organisational Chart</p> <p><i>Comment: this Code applies to local authorities, including parish councils with annual income or expenditure (whichever is the higher) over £200,000 and are mandatory provisions. Whilst Stanton Parish Council is not subject to the Local Government Transparency Code 2015, in light of its commitment to openness and transparency, Council is advised to consider maintaining and monitoring the Council's website so that it is updated regularly with the above information.</i></p>
<p>15. General Data Protection Regulations (GDPR). Examination of:</p> <ul style="list-style-type: none"> • ICO Registration • Compliancy with GDPR requirements 	<p>The Council is correctly registered with the Information Commissioner's Office (ICO) as a Data Controller in accordance with the Data Protection Legislation. Council has taken active steps to ensure compliancy with the GDPR requirements and has produced a comprehensive suite of policies that provide clear responsibilities and obligations of Stanton Parish Council in respect of the collecting, using and protecting of personal information in accordance to the provisions of the GDPR.</p> <p><i>Comment: the documentation on the Parish Council's website covers the framework that the public can expect for dealing with requests from individuals who have the right to know what data is held on them, why the data is being processed and whether it will be given to any third party.</i></p> <p>See comments below for review of council's adopted policies.</p>
<p>16. Responsibilities as a Trustee</p>	<p>The Council does not act as a sole trustee, nor does it have any responsibilities as a trustee.</p>
<p>17. Additional comments. Examination of:</p> <ul style="list-style-type: none"> • Annual Meeting • Signing of Declaration of Acceptance of Office • Register of Interests • Minutes • Treatment of Apologies • Openness of Local Government Bodies Regulations 2014 • Policies • Accessibility for websites and Mobile Applications • Use of secure email 	<p>Council held its Annual Meeting of the newly elected parish council on 11th May 2023 with the election of the Chair the first item on the agenda in accordance with legislation.</p> <p>In accordance with section 83(4) of the 1972 Act, Council has ensured that all Councillors, on being elected to office, have signed a declaration of acceptance of office in the presence of another councillor or the clerk. This was done before or at the first meeting of the council after the election, and where permitted by the council at that meeting, by a later date fixed by the council.</p> <p>Evidence was seen on the District Council's website of the Register of Interests for all current serving councillors. The list that can be found at the council's own webpage: https://stanton.suffolk.cloud/who-we-are/register-of-interests/ is considered to be out of date.</p> <p><i>Comment: council is advised to amend the information on the above webpage and either publish the current registers as filled out following the elections in May 2023 or provide a link direct to the District Council's webpage for Register of Interest for Stanton Parish Council.</i></p> <p>In accordance with the Local Government Act 1972 Schedule 12 para 41 (1), Council is aware that</p>

the looseleaf minutes and associated documents of the parish council should be initialled and signed by the person chairing the meeting at the time of signature which ensures their lawful providence. During the year under review, at each meeting the Council has approved the minutes and given further approval for the minutes to be digitally signed after the meeting.

Comment: Council has noted that LGA 1972 Schedule 12, paragraph 41 allows for the minutes of the proceedings of meetings of a local authority to be recorded on loose leaves consecutively numbered and has implemented such a system.

Whilst the minutes show apologies given (where applicable), there is no formal record to show that Council has approved the apologies submitted.

Recommendation: s85 of the 1972 Act states that “..if a member of a local authority fails throughout a period of six consecutive months from the date of his last attendance to attend any meeting of the authority, he shall, unless the failure was due to some reason approved by the authority before the expiry of that period, cease to be a member of the authority.” Council is advised to ensure that all absences are not merely recorded but approved by the Council thereby ensuring that the absence is not treated as unapproved. An accidental or unforeseen absence at a subsequent meeting could then lead to an unnecessary disqualification. NALC LTN 5 provides further clarity on this matter including the good practice of seeking approval for an apology in writing.

The Openness of Local Government Bodies Regulations 2014 were enacted on 5th August and came into force on 6th August 2014. These regulations allow for the filming and recording of Council meetings (and other specified public bodies) and provide for access to records (e.g. of decisions made by officers).

Comment: Council has reviewed the provisions of the 2014 Regulations to ensure that, by publishing a range of information online, it is compliant with the provisions of the 2014 Act.

The Regulations of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 was enacted on 23rd September 2018. The regulations aim to ensure public sector websites and mobile apps are accessible to all users, especially those with disabilities.

Comment: Council has reviewed the provisions of the Regulations to ensure that it is compliant and has produced an Accessibility Statement detailing how information will be produced on its website and how to gain access to content that is not readily accessible.

A review of the Council’s adopted policies as seen on the website was undertaken during the internal audit review. The Clerk is in the process of ensuring that all existing policies will be

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	<p>reviewed during the year to ensure that they are compliant with legislative changes. <i>Comment: to ensure clarity on the relevance of each policy, the Clerk has ensured that the review details on each document will be noted thereby demonstrating that they are regularly reviewed, fit for purpose, and adhered to.</i></p> <p>The Clerk has a “gmail” account that is administered solely by the Clerk for the council’s business. Councillors use their own emails for parish council business. <i>Comment: Council should be aware of the importance of ensuring that it uses a secure e-mail system thereby identifying that it has local government status and demonstrating authenticity when building trust and credibility with the public. It might wish to note guidance as contained within proper practices which recommends that a secure email system with a GOV.UK domain name be used to support council’s official email accounts for officers and councillors.</i></p> <p>Recommendation: Council might wish to consider comments raised in the Practitioners Guide to Proper Practices (effective March 2024) paragraph 1.26 which states that every authority should have an email account that belongs to the council and to which the council has access. Further guidance issued over the use of a secure e-mail system with a gov.uk address with dedicated email addresses for councillors can be found at sections 5.210 to 5.219.</p>
<p>The Internal Auditor offers her appreciation for the assistance given by the Clerk in completing this audit. Acknowledging that the primary role of the internal auditor is to provide independent, objective assurance to members and management that key risks are being managed effectively, a number of comments and recommendations have been made in the light of the year ending 31st March 2024 with areas identified that should be expanded to provide independent assurance that the council’s risk management, governance and internal control processes are operating effectively.</p> <p><i>For further information and for the year effective 1st April 2024 please refer to Governance and Accountability for Smaller Authorities in England - A Practitioners' Guide to Proper Practices to be applied in the preparation of statutory annual accounts and governance statements - March 2024.</i></p>	

Victoria S Waples

Date of Internal Audit Visit: 18.04.24

Date of Internal Audit Report: 21.04.24

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