

Marden Parish Council

Internal Audit Report 2019-20 (Interim)

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Background

Statute requires all town and parish councils to arrange for an independent internal audit examination of their accounting records and systems of internal control and for the conclusions to be reported each year in the Annual Governance and Accountability Return (AGAR), which requires assurances over several specific areas.

This report sets out the work undertaken in relation to the 2019-20 financial year, during our interim visit to the Council, which took place on 5th November 2019 and at our offices both prior and subsequent to that visit.

Internal Audit Approach

In commencing our review for the year, we have again had regard to the materiality of transactions and their susceptibility to potential misrecording or misrepresentation in the year-end Statement of Accounts/AGAR. Our programme of cover is designed to afford appropriate assurance that the Council's financial systems remain robust and operate in a manner to ensure effective probity of transactions and to afford a reasonable probability of identifying any material errors or possible abuse of the Council's own and the national statutory regulatory framework. The programme is also designed to facilitate our completion of the 'Internal Audit Report' in the Council's AGAR, which requires independent assurance over several internal control objectives.

Overall Conclusion

We are again pleased to conclude that, based on the programme of work undertaken to date, the Council continues to maintain adequate and effective internal control arrangements with a few relatively minor issues requiring action. We are again pleased to acknowledge the quality of records maintained by the Clerk and thank her for her assistance, which has ensured the smooth progress of our review process.

Detailed Report

Maintenance of Accounting Records & Bank Reconciliations

The Council uses the RBS Rialtas Alpha software to maintain its accounting transactions with four bank accounts in use. Current and Deposit accounts are in place with NatWest with a daily sweep facility between the two, together with a Santander and Unity Trust bank account, the last being used for most transactions (on-line), although the NatWest account is still used to pay previously existing direct debit and standing order transactions and occasional cheques.

Our objective is to ensure that accounting records are being maintained accurately and currently and that no anomalous entries appear in cashbooks or financial ledgers. We have to date this year: -

- Agreed the opening Alpha software trial balance detail with that in the 2018-19 Statement of Accounts and certified AGAR;
- Verified that the financial ledger remains in balance at the present date (i.e. 30th September 2019), although the Santander account has only been verified to 30th June 2019 at this stage, as no subsequent bank statement has been received as yet;
- Ensured that the cost and expenditure coding structure remain appropriate for purpose;
- Checked and agreed detail of all transactions, in view of their relatively low volume, in all cashbooks for the year to the dates (as above) to the relevant NatWest, Santander and Unity bank statements; and
- Verified the accuracy of bank reconciliation detail on all accounts as at 30th September 2019, excepting the Santander account, which has been verified as at 30th June 2019.

Conclusions and recommendation

No significant issues have been identified in this review area at this stage, although we have suggested to the clerk that, to ensure that when checking the monthly bank reconciliations, members are also provided with a copy of the Alpha Trial Balance detail for the accounts as at that date in order that they may verify the month-end “Balance per Cashbook” value shown on the reconciliations.

Given the relatively low volume of transactions annually, we have previously questioned the need to retain the two NatWest accounts and understand that, after due consideration, members have determined to continue their retention at present. We also note that further consideration is to be given in the near future to the placement of surplus funds with the CCLA Deposit Fund.

We shall undertake further work in this area at our final visit including ensuring the accuracy of transactions as recorded in the accounting records for the remainder of the financial year and the accurate disclosure of the combined bank balances in the AGAR.

R1. In order to afford members the opportunity to validate all monthly bank reconciliation detail, the month-end trial Balance should also be printed and provided for their

examination to provided detail of the “Balance per Cashbook” value recorded on the reconciliations.

Review of Corporate Governance

Our objective here is to ensure that the Council has robust corporate governance documentation and processes in place, and that, as far as we may reasonably be expected to ascertain (as we do not attend Council or Committee meetings), all meetings are conducted in accordance with the adopted Standing Orders and no actions of a potentially unlawful nature have been or are being considered for implementation. We have: -

- Noted that Standing Orders were reviewed and re-adopted during 2018-19 and that the Financial Regulations have been revised and brought into line with the latest (2019) model document recently issued by NALC;
- Noted that tendering limits in both documents are in line with the requirements of the Public Contracts Regulations (2015) and are set at £25,000; and
- Reviewed minutes, as posted on the Council’s website, for the year to date (excluding those relating to planning issues), to ensure that no actions have been taken or are being considered that might result in unlawful activity or expense being incurred by the Council.

We again acknowledge the existence of a substantial file of the Council’s Corporate Policies and Procedures, which are subjected to periodic review and update.

Conclusions

We are pleased to record that no issues have arisen in this area of our review process warranting formal comment or recommendation currently: we shall continue to consider the Council’s approach to Corporate Governance issues at future visits.

Review of Expenditure

Our aim here is to ensure that: -

- Council resources are released in accordance with the Council’s approved procedures and budgets;
- Payments are supported by appropriate documentation, either in the form of an original trade invoice or other appropriate form of document confirming the payment as due and/or an acknowledgement of receipt, where no other form of invoice is available;
- Members are provided with full details of all payments made at meetings as appropriate and that they are formally verifying the supporting invoices accordingly;
- All discounts due on goods and services supplied are identified and appropriate action taken to secure the discount;
- The correct expense codes have been applied to invoices when processed; and
- VAT has been appropriately identified and coded to the control account for periodic recovery.

We discussed the payment release process with the clerk last year, specifically in relation to electronic payments through the Unity online banking facility and considered them generally appropriate, with one proviso / recommendation. Whilst not wishing to imply any impropriety on the part of the Clerk or members, we note that members are now initialling the covering sheet to each payment, but are not signing-off the actual invoices confirming their review.

Following a relatively recent fraud by a Town Clerk where members were not evidencing their review of invoices with the invoices subsequently being represented for payment sometimes on more than one occasion resulting in duplicated payments: the cheques were actually written in erasable ink, which the clerk then amended to show her own name as the payee.

We have examined a sample of 21 payments made during the financial year to 30th September 2019, selecting all those non-salary related transactions in the NatWest and Unity Trust accounts in excess of £500 plus a more random sample of every 25th transaction to ensure compliance with the above criteria. Our test sample totals £63,600 and equates to 77% of non-salary related expenditure in the year to the above date with all the above criteria met.

We note that the VAT reclaim for the second half-year in 2018-19 was prepared, submitted to and reimbursed by HMRC, noting that the first half-year reclaim for 2019-20 will be prepared and submitted shortly.

In examining the detailed Alpha nominal ledger codes, we again note that the 2018-19 second half-year's reclaim (six months to 31st March 2019) has, as above, been repaid by HMRC, but again coded to an income code (# 1065) rather than to the VAT Control account (# 105). As advised in last year's report, with the Council's Accounts and AGAR detail prepared and presented in "Income and Expenditure" format, rather than "Receipts and Payments", all reclaimed / recovered VAT should be posted to the control account (# 105), as recording the prior year-end reclaimed amount as an income item effectively overstates the Council's income and expenditure by that amount in the year of receipt.

Conclusions and recommendations

As indicated above, accounting for the second half-yearly VAT recovery should be amended by journal coding it to the VAT control account rather than as an income item.

We also consider that improved controls and evidencing of members' review of invoices and their approval for payment should be implemented as indicated in the body of the report.

We shall extend our testing in this area at our final visit to include a further sample of payments over the remainder of the year also ensuring compliance with the above criteria and the correct disclosure of the year-end VAT reclaim as a debtor in the Accounts and AGAR rather than an additional income item.

R2. To reduce the potential risk of purchase invoices being paid twice, the actual invoices, rather than the covering sheet, should be initialled to confirm members' examination and approval of the payments for release. As suggested previously, this could be achieved through acquisition of a suitably designed certification stamp.

R3. All VAT reclaimed and repaid by HMRC should be coded to the VAT control account and not be regarded as separate income: an appropriate journal adjustment should be made to transfer the 2018-19 final half-year's amount recovered to the control account.

Assessment and Management of Risk

Our aim here is to ensure that the Council has put in place appropriate arrangements to identify all potential areas of risk of both a financial and health and safety nature, whilst also ensuring that appropriate arrangements exist to monitor and manage those risks in order to minimise the opportunity for their coming to fruition. We have: -

- Examined the Council's current insurance schedule to ensure that appropriate cover is in place with AXA plc, noting that Public and Employer's Liability cover are set at £10 million with Fidelity Guarantee cover set at £500,000, all of which we consider more than adequate to meet the present needs of the Council;
- Noted that an appropriate Financial Risk Assessment has been reviewed and re-adopted by the Council at the July 2019 meeting: we also note the existence of a comprehensive file of other service delivery specific risk assessments which were also reviewed and re-adopted at the March 2019 Council meeting; and
- Also noted from our examination of risk documentation that, with the approval of Insurers, detailed health and safety inspections in accordance with RoSPA guidelines are undertaken at the Council's play areas fortnightly, also noting that the results of these inspections are reported to members with any necessary appropriate action taken to address issues identified.

Conclusions

We are pleased to report that no issues have been identified in this area of our review process warranting formal comment or recommendation this year. We understand that the Village Caretaker who undertakes the fortnightly checks has, in the past, received the relevant accredited training and suggest that it may be beneficial for him to attend a refresher training session to ensure he is fully up-to-date on legislation, etc. We shall continue to monitor the Council's approach to risk management at future visits.

Budgetary Control and Reserves

We aim in this area of our work to ensure that the Council has appropriate procedures in place to determine its future financial requirements leading to the adoption of an approved budget and formal determination of the amount to be precepted on the parent Council; that effective arrangements are in place to monitor budgetary performance throughout the financial year and that the Council has identified and retains appropriate reserve funds to meet future spending plans.

This visit occurred in advance of any formal consideration or decision on the budgetary and precept requirement for 2020-21: consequently, we shall review the outcome at our final review visit for the year.

We are again pleased to note that members are provided with detail of monthly transactions, together with detail of bank balances and quarterly budget performance reports, prepared by the clerk based on the Alpha accounting software. We have reviewed the current budget position (as at 30th September 2019) as set out in the detailed report generated by the Alpha software with no significant or unexplained variances identified warranting further enquiry or investigation.

Conclusions

We are pleased to report that no issues have been identified in this area of our review process currently. We shall undertake further work at our final visit including ensuring the formal approval and adoption of the 2020-21 budget and precept; examining the year-end budget outturn and assessing the appropriateness of retained reserves to meet the Council's ongoing revenue spending requirements and any future development aspirations.

Review of Income

In addition to the annual precept, the Council receives income from additional service areas, including the cemetery, the annual Christmas Fayre, the Summer Holiday Play Scheme and occasional rental income from the Playing field and Sowden field, together with occasional grants from the parent Council.

We are pleased to note that fees and charges in respect of the cemetery and Summer Play Scheme have been reviewed and formally adopted by the Council for 2019-20 in accordance with the requirements of the Council's Financial Regulations.

We have examined the controls in place in respect of the cemetery in relation to the identification and processing of fees arising in respect of interments for the year to 30th September 2019 ensuring that for each, an appropriate entry has been made in the Burial Register; that all expected and legally required supporting documentation, such as undertakers' interment applications, burial or cremation certificates, are in place and that the appropriate fees have been levied and recovered within a reasonable time frame. We noted last year that one undertaker had been reticent in settling fees due to the Council and are pleased to note that these have now finally been recovered.

We have also examined the controls in place regarding memorials for the year to date and are pleased to record that no matters have arisen in this area.

We have also examined income relating to the Summer Holiday Play Scheme agreeing detail in the control spreadsheet record to the Alpha nominal income code and ensuring that the income due has been received and banked accordingly.

Finally, we have examined the detailed nominal income records in the Alpha accounting software to ensure that no significant misanalyses or other anomalous details are evident: again, no issues arise other than in relation to the aforementioned incorrect recording of recovered 2018-19 VAT.

Conclusions

We are pleased to record that no issues arise in this area warranting formal comment or recommendation at this stage of our review. We shall undertake further work in this area at our final visit, examining the operative controls over other income streams.

Petty Cash Account

The Council does not operate a formal Petty Cash scheme: any out-of-pocket expenses incurred by staff are reimbursed on submission of a properly authorised and supported claim

form, together with till receipts and / or trader invoices. As also suggested last year, the Council may wish to consider acquiring an appropriate credit card to facilitate payment for any ad hoc expenses incurred rather than rely on staff using their own finances initially.

Review of Staff Salaries

In examining the Council's payroll function, we aim to confirm that extant legislation is being appropriately observed as regards adherence to the Employee Rights Act 1998 and the requirements of HMRC legislation as regards the deduction and payment over of income tax and NI contributions.

The clerk uses bespoke Sage payroll software to produce the monthly payroll for the four permanent members of staff, together with casual Play Scheme helpers. Consequently: we have:

- Noted that all staff, including the Play Scheme helpers, are now paid from the Unity Trust bank account;
- Noted that members have reviewed staff pay approving implementation of the revised NJC pay scales effective from 1st April 2019, all four permanent staff being formally advised on their revised salary / hourly pay rate;
- Verified the gross salaries paid in October 2019 to the four permanent staff members and August 2019 to the Play Scheme helpers by reference to the approved NJC scales (Clerk and Assistant) and hourly rates for the remainder;
- Verified that Tax and NIC deductions have been calculated correctly by reference to the monthly payslips as above also ensuring that these deductions have been paid over to HMRC in an accurate and timely manner; and
- Noted that three of the four permanent employees are contributing to "NEST" pensions.

Conclusions

We are pleased to record that no issues arise in this area of our review process warranting formal comment or recommendation.

Investments & Loans

Our objectives here are to ensure that the Council is investing "surplus funds", be they held temporarily or on a longer term basis in appropriate banking and investment institutions; that an appropriate investment policy is in place; that the Council is obtaining the best rate of return on any such investments made, that interest earned is brought to account correctly and appropriately in the accounting records and that any loan repayments due to or payable by the Council are transacted in accordance with the relevant loan agreements.

We drew attention in last year's report to the revised requirement (effective from 1st April 2018) for Councils with total funds in excess of £100,000 to develop an appropriate Annual Investment Policy / Strategy (the limit was formerly £500,000). We are disappointed to note that the Council has still to comply with this requirement, understanding that it should be considered at the next Finance meeting in January 2020.

The Council has one residual PWLB loan repayable half-yearly: we have verified the value of the first half-year's repayment for 2019-20 to the PWLB demand note as part of our above referenced payment review sample.

Conclusions and recommendation

The Council needs to ensure compliance with the legislative requirement for a formal Investment Strategy to be developed and adopted: to assist the process, we have provided the Clerk with a few examples in use at our other clients.

We shall undertake further work in this area at our final visit ensuring the accurate disclosure of the residual loan liability balance as at 31st March 2019 in the year's AGAR.

R4. The Council must ensure that it complies with extant legislation as soon as practicable developing and adopting a formal Investment Strategy / Policy.

Rec. No.	Recommendation	Response
Review of Accounting Arrangements and Bank Reconciliations		
R1	In order to afford members the opportunity to validate all monthly bank reconciliation detail, the month-end trial Balance should also be printed and provided for their examination to provided detail of the "Balance per Cashbook" value recorded on the reconciliations.	
Review of Expenditure & VAT		
R2	R2. To reduce the potential risk of purchase invoices being paid twice, the actual invoices, rather than the covering sheet, should be initialled to confirm members' examination and approval of the payments for release. As suggested previously, this could be achieved through acquisition of a suitably designed certification stamp.	
R3	All VAT reclaimed and repaid by HMRC should be coded to the VAT control account and not be regarded as separate income: an appropriate journal adjustment should be made to transfer the 2018-19 final half-year's amount recovered to the control account.	
Investments & Loans		
R4	The Council must ensure that it complies with extant legislation as soon as practicable developing and adopting a formal Investment Strategy / Policy.	