
PURPOSE OF REPORT

To consider the implications and options presented in new regulations covered by External Audit for Smaller Authorities (External Audit) and, linked to that, the application of the previous guidance concerning the Transparency Code for Smaller Authorities (the Code).

RECOMMENDATION

That the Parish Council:

\[ \text{a. Gives notice of its decision to opt out of the external audit arrangements that Smaller Authorities’ Audit Appointments Ltd (SAAA) is putting in place,} \]
\[ \text{b. Agrees a form of internal audit based on self scrutiny, and} \]
\[ \text{c. Irrespective of the decision at (a) adopts the requirements of the Transparency Code for Smaller Authorities as best practice, with immediate effect, and amends Financial Regulations accordingly.} \]

BACKGROUND

Parish Councils have received two documents providing details with regards new Audit Arrangements, and the Publication of Information that Councils such as the Parish Council should comply with. These two changes are directly linked in that if the Council opts out of the current audit arrangements, “in place of routine audit, these smaller authorities will be subject to the new transparency requirements laid out in the Code”.

Audit Arrangements

The Local Audit and Accountability Act 2014 sets out a new audit framework for local public authorities (including Parish Councils) which are currently covered by the Audit Commission regime.

The Parish Council currently has two audits of its accounts. The first and more detailed audit is appointed by the Audit Commission. There is an annual fee of £200 (excl VAT). The appointed auditors are supplied with full copies of the Councils Minutes, copies of the Standing Orders and Financial Regulations, (and any other Governance documents they request) together with the Accounts and all supporting financial documents including bank statements, cheque stubs, invoices, income statements etc.

The new regulations allow parish Councils with income / expenditure below £25,000 per annum to opt out of these arrangements. There are three provisos with the third being that ‘none of the relevant circumstances in paragraph 9 (3) [of the regulations] apply in relation to the keeping of the accounts for the preceding financial year or to the audit of those accounts.’ There are 6 ‘relevant circumstances’. These are reproduced in full as Appendix A. None of the relevant circumstances apply to Hannington Parish Council and so the opt-out is available.

If the Council decides to opt-out, the decision must be communicated to admin@localaudits.co.uk by 31 March 2016. If the Council decides not to opt out, or fails to lodge the decision by that deadline, the authority will be regarded as opted-in for the five year period beginning on 1 April 2017 and ending on 31 March 2022 and will NOT have the opportunity to opt out before the end of that period.
RECOMMENDATION

The Council gives notice of its decision to opt out of the external audit arrangements that Smaller Authorities’ Audit Appointments Ltd (SAAA) is putting in place.

If the Council then chooses to have a limited assurance audit review, “it [the Council] will need to appoint an audit panel, consider the panel’s recommendations and appoint an auditor in the same was as a Group 2 authority”. [See details in Appendix A attached.

The second audit applied to the Council’s accounts is also government controlled. There is no fee. By law, every authority will still have to complete and publish an Annual Return (financial) irrespective of whether it is opted-in or opted-out. This requirement has not changed. If a Council decides to opt out, in addition to the Annual Return it will have to complete and submit to SAAA an annual exemption form.

Internal Audit

Internal audit is currently fulfilled by the first audit referred to in this report and the scrutiny applied by the Council itself in the way it authorises and certifies payments and approves the financial statements in-year and the Final Accounts at the year end.

The Council’s has turnover of around £6,000 per annum. It has three sources of income:-

- Council Tax precept charged to residents that is collected and paid over by Basingstoke and Deane Borough Council,
- Grants paid directly by BDBC, and
- VAT refunds claimable from HMRC.

In 2015/16 the Council also accessed a specific grant from Hampshire County Council to help towards the cost of the scheme to convert ‘stiles‘ to gates’.

Similarly, the Council makes very few payments in each year; approximately a dozen in total. All are made by cheque, approved by Council in advance and minuted in detail, and counter-signed by two Councillors. The Accounts are also prepared in a the simple format as ‘Receipts and Payments’. There are no investments, stock in hand etc. The only assets are cash at bank and those recorded in the Assets Register eg notice boards, benches etc. If the recent legal action is successful, the the village green will be registered to the Council.

If the Council decides to opt-out of the arrangements the SAAA is putting in place, the Council needs to consider what, if any, procedures need to be put in place. Bearing in mind the very small number of transactions undertaken in the year, the internal control mechanisms (eg two signatories on each cheque) and the ‘requirements’ of the Transparency Code reported below, it is RECOMMENDED the Council agrees a form of internal audit based on self scrutiny. The internal audit is would have two areas of responsibility:-

- Scrutiny of the financial records, which would be demonstrated by counter-signing the Final Accounts. Ideally, this Councillor would NOT be an authorised counter-signatory... and,
- Monitoring compliance with the requirements of the Transparency Code (see below).

Transparency Code for Smaller Authorities
This Code is issued by the Secretary of State for Communities and Local Government on recommended practice as to the publication of information by local authorities about the discharge of their functions and other matters which he considers to be related. This Code does not replace or supersede the existing legal framework for access to and re-use of public sector information provided by the Freedom of Information Act 2000.

This Code applies to a small range of public bodies including Parish Councils with an annual turnover not exceeding £25,000; defined as ‘smaller authorities’.

As stated earlier, this Code is in place of routine audit. The Government considers that publication of the items required in this Code will provide the local electorate and ratepayers with a clear picture of the activities of these smaller authorities. Most of this information is already produced by the majority of smaller authorities and the Government therefore considers that compliance with this Code will not place a significant burden on these authorities.

Part 2 of the Code details what information should be published (see Appendix B). Part 2.1 details the information that must be published annually, and Part 2.2 details the information that must be published more frequently than annually. This includes the publication of Minutes, agendas and papers of formal meetings.

Part 3 of the Code provides guidance on the method of publication, and stipulates that ‘the data and information specified in this Code must be published on a website which is publicly accessible free of charge’. The Council papers are circulated to residents via the village email system. This is a proactive system. Hannington also has a web site. This includes a Hannington Council page. Agendas and Minutes are posted on the relevant page by the ‘site manager’. I would therefore advise the Council that there are systems and facilities in place that meet the requirements of the Code.

RECOMMENDATION

Irrespective of the decision at (a), the Council adopts the requirements of the Transparency Code for Smaller Authorities as ‘best practice’, with immediate effect, and amends Financial Regulations accordingly.

SUPPLEMENTARY PAPERS

Appendix A: External Audit for Smaller Authorities, issued by Smaller Authorities’ Audit Appointments Ltd 27 January 2016

Appendix B Transparency Code for Smaller Authorities, issued by Department for Communities and Local Government December 2014.

Neither of the above documents are large (approximately 6 and 12 pages respectively). However, residents with poor broadband speeds may find it difficult to access the report and the two Appendices. I am therefore sending the report only to residents. If you would like to receive a copy of either or both of the Appendices, please do not hesitate to contact me chrispottinger@live.co.uk.

AUTHOR
Chris Pottinger,
Clerk, Hannington Parish Council
EXTERNAL AUDIT FOR SMALLER AUTHORITIES

Further to my letter of 18 December 2015, I am writing to give you some more detailed information to help your authority to decide whether or not to opt out of the external audit arrangements that Smaller Authorities’ Audit Appointments Limited (SAAA) is putting in place. These arrangements will take effect from 1 April 2017.

As stated in my earlier letter, the deadline for making a decision to opt out is 31 March 2016.

Background

Under the Local Audit (Smaller Authorities) Regulations 2015 (‘the Regulations’) (http://www.legislation.gov.uk/ukdsi/2015/9780111126103/pdfs/ukdsi_9780111126103_en.pdf), SAAA is required to make audit arrangements for all smaller authorities other than those that have given notice that they wish to make their own arrangements. The SAAA scheme will therefore cover all authorities that have not formally decided to opt out. Authorities covered by the SAAA scheme are referred to as ‘opted-in’ authorities.

By law, every authority will still have to complete and publish an annual financial return irrespective of whether it is opted-in or opted-out. This requirement has not changed.

If you are considering opting out, you must hold a properly constituted meeting and decide whether or not you wish to do so. This decision must be recorded.

If you do decide to opt out of the SAAA scheme you must communicate that decision to admin@localaudits.co.uk or SLB Opt Out, 109 Great Russell Street, London WC1B 3LD by 31 March 2016.

If notification of your decision to opt out is not received by 31 March 2016, your authority will be regarded as opted-in for the five-year period beginning on 1 April 2017 and ending on 31 March 2022 and you will not have another opportunity to opt out before the end of that period.

How do the Regulations affect different types of authority?

The effect of the Regulations is to divide smaller authorities into five groups, depending on their financial turnover and on whether or not they decide to opt out of the SAAA scheme. Please see Appendix 2 for a flowchart of this process.

<table>
<thead>
<tr>
<th>Group 1</th>
<th>Opted-in authorities (those that have not formally decided to opt out) with income or expenditure exceeding £25k;</th>
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<tbody>
<tr>
<td>Group 2</td>
<td>Opted-out authorities with income or expenditure exceeding £25k;</td>
</tr>
<tr>
<td>Group 3</td>
<td>Opted-in authorities with neither income nor expenditure exceeding £25k;</td>
</tr>
<tr>
<td>Group 4</td>
<td>Opted-out authorities with neither income nor expenditure exceeding £25k; and</td>
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</tbody>
</table>
Group 5 Financially inactive authorities.

Group 1 Opted-in authorities with income or expenditure exceeding £25k
Arrangements for 2017/18 and subsequent years will be the same as they are now. The only difference will be that your auditor will be appointed by SAAA. After completing your annual return, you should submit it by the due date to the auditor appointed by SAAA, who will undertake the limited assurance audit review.

Group 2 Opted-out authorities with income or expenditure exceeding £25k
If you have opted out of the SAAA scheme you will need to appoint an independent audit panel. Guidance on appointing an audit panel is available from CIPFA and can be found at http://www.cipfa.org/policy-and-guidance/publications/g/guide-to-auditorpanels-pdf. The audit panel will consider which auditor to appoint and will make a recommendation to the authority, which will have to ratify the audit panel’s decision. Only accounting firms that meet certain licensing criteria can be appointed to undertake limited assurance audit reviews. Firms that do not meet those criteria cannot be considered for appointment. DCLG is working with the professional accountancy bodies to establish appropriate criteria, and we will inform all opted-out authorities as soon as we have more information about the firms that you can appoint.

You will need to agree the fees to be charged for undertaking the limited assurance audit review with the auditor you have appointed.

You will be required to complete an annual certification form (which SAAA will provide) and to submit this to SAAA by an agreed date. The certification form will include:

- details of the firm that you have appointed as your auditor;
- confirmation that the limited assurance audit review has been undertaken by the set date; and
- confirmation that you have complied with the Regulations.

SAAA will carry out independent checks to ensure that the information provided in the certification form is correct.

If you fail to appoint an auditor, the Secretary of State will make the appointment. You will be responsible for paying the auditor’s fees and for any administrative costs.

Group 3 Opted-in authorities with neither income nor expenditure exceeding £25k
With effect from 2017/18 very few of these authorities will be required to undergo a limited assurance audit review or to pay any audit fee. The circumstances in which a limited assurance audit review may be necessary are set out in Clauses 9(1)(b) and 9(3) of the Regulations (attached as Appendix 1).

All authorities will, however, need to complete and publish an annual return in accordance with the Transparency Code for Smaller Authorities (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/388541/Transparency_Code_for_Smaller_Authorities.pdf). You will also need to complete an annual exemption form (which SAAA will provide) and submit this to SAAA or an auditor specified by
SAAA by an agreed date. By completing this form you certify that, under the Regulations, there is no requirement for a limited assurance audit review for the financial year in question.

If you wish to have a limited assurance audit review, despite not being required to do so, you will need to inform SAAA by the end of the financial year in question. SAAA will then appoint an auditor to undertake the review, for which a fee of £200 will be payable.

**Group 4 Opted-out authorities with neither income nor expenditure exceeding £25k**

Unless required to submit their accounts for review in the circumstances set out in Appendix 1, these bodies will only need to complete and publish an annual return and to complete and submit to SAAA or an auditor specified by SAAA an annual exemption form in the same way as Group 3 authorities.

If you wish to have a limited assurance audit review, you will need to appoint an audit panel, consider the panel's recommendations and appoint an auditor in the same way as a Group 2 authority. You will need to agree the fees to be charged for undertaking the limited assurance audit review with the auditor that you have appointed.

**Group 5 Financially inactive authorities**

If your authority has no income or expenditure you should continue to provide an ‘inactive’ certificate to the auditor appointed by SAAA.

**Electors’ rights**

If an elector wishes, within the prescribed time period, to ask a question about, or make an objection to an authority's accounts, he or she may need to contact the appointed auditor. For opted-in authorities (Groups 1 and 3) the auditor will be (in the case of Group 1 authorities, will already have been) appointed by SAAA. Fees for any additional audit or investigatory work will be charged in accordance with scales set by SAAA.

Questions about and objections to the accounts of authorities in Group 2 and those in Group 4 that have appointed an auditor will be considered by the appointed auditor, who will report the outcome to the authority. If a Group 4 authority needs to appoint an auditor, it should follow the procedure described above, appointing an audit panel and taking a decision based on that panel's recommendations.

If an auditor issues a public interest report in relation to a Group 3 or Group 4 authority, DCLG will require that authority either to commission a limited assurance audit review in the following year (on terms to be agreed between the authority and the auditor) or to opt in to the SAAA scheme for the remainder of the contract period (until 31 March 2022).

**Full audit**

Any smaller authority can still choose to be treated as a full audit authority, as defined in the Local Audit and Accountability Act 2014, and to commission a full audit either from an auditor appointed by SAAA or (for authorities in Groups 2 and 4) from a licensed auditor appointed through proper processes, following a recommendation from a duly constituted audit panel.
Conclusion

The decisions that are available to smaller authorities are set out in the flowchart at Appendix 2. We will in due course be publishing questions and answers on our website, but in the meantime I or any of my colleagues at SAAA would be happy to answer any questions that you might have.

Please remember if you do decide to opt out of the SAAA scheme you must communicate that decision to admin@localaudits.co.uk or SLB Opt Out, 109 Great Russell Street, London WC1B 3LD by 31 March 2016.

Mike Attenborough-Cox

Chairman - Smaller Authorities’ Audit Appointments Limited
Appendix 1

Extract from the Local Audit (Smaller Authorities) Regulations 2015

Exempt authorities

9.—(1) A smaller authority may certify itself as an exempt authority for a financial year if—
   (a) the qualifying condition for that authority and that financial year in paragraph (2) is met;
   (b) the financial year is not one of the first three years of the authority’s existence; and
   (c) none of the relevant circumstances in paragraph (3) apply in relation to the keeping of the accounts for the preceding financial year or to the audit of those accounts.

(2) The qualifying condition is met for an authority and a financial year if—
   (a) the higher of the authority’s gross income for the year and its gross expenditure for the year does not exceed £25,000, or
   (b) the higher of the authority’s gross receipts and gross payments for the year does not exceed £25,000.

(3) The relevant circumstances are—
   (a) the local auditor has made a public interest report(a) in respect of the authority or any entity connected with it;
   (b) the local auditor has made a recommendation to the authority, relating to the authority or any entity connected with it;
   (c) the local auditor has issued an advisory notice under paragraph 1(1) of Schedule 8 to the Act, and has not withdrawn the notice;
   (d) the local auditor has commenced judicial review proceedings under section 31(1) of the Act, and the proceedings have not been withdrawn nor has the court found against the auditor;
   (e) the local auditor has made an application under section 28(1) of the Act for a declaration that an item of account is unlawful, and the application has not been withdrawn nor has the court refused to make the declaration; or
   (f) the court has declared an item of account unlawful after a person made an appeal under section 28(3) of the Act.
* An inactive authority is one that has no income or expenditure
Transparency code for smaller authorities

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Part 1: Introduction
Policy context
1. This Code is issued to meet the Government’s desire to place more power into citizens’ hands to increase democratic accountability. Transparency gives local people the tools and information they need to hold local public bodies to account.

2. The Local Audit and Accountability Act 2014 sets out a new audit framework for local public authorities which are currently covered by the Audit Commission regime. Under the new audit framework smaller authorities, including parish councils, internal drainage boards, charter trustees and port health authorities, with an annual turnover not exceeding £25,000 will be exempt from routine external audit. In place of routine audit, these smaller authorities will be subject to the new transparency requirements laid out in this Code. This will enable local electors and ratepayers to access relevant information about the authorities’ accounts and governance.

3. The Government considers that publication of the items in this Code will provide the local electorate and ratepayers with a clear picture of the activities of these smaller authorities. Most of this information is already produced by the majority of smaller authorities with a turnover not exceeding £25,000, and the Government therefore considers that compliance with this Code will not place a significant burden on these authorities.

Application
4. This Code is issued by the Secretary of State for Communities and Local Government in exercise of his powers under section 2 of the Local Government, Planning and Land Act 1980 ("the 1980 Act"), as amended by section 38 of the Local Audit and Accountability Act 2014, to issue a code of
recommended practice as to the publication of information by local authorities about the discharge of their functions and other matters which he considers to be related.

5. This Code does not replace or supersede the existing legal framework for access to and re-use of public sector information provided by the Freedom of Information Act 2000 (as amended by the Protection of Freedoms Act 2012), Environmental Information Regulations 2004, the Re-use of Public Sector Information Regulations 2005 and Infrastructure for Spatial Information in the European Community (INSPIRE) Regulations 2009.

6. This Code applies to the following types of authorities in England with an annual turnover not exceeding £25,000: parish councils, internal drainage boards, charter trustees and port health authorities (“smaller authorities”).

5 Turnover is defined as the higher of an authority’s gross income for the year and its gross expenditure for the year.1

[1 Where authorities are maintaining their accounts on a receipts and payments basis, ‘expenditure’ should be read as ‘payments’ and ‘income’ should be read as ‘receipts’.

Data protection

7. The Government believes that local transparency can be implemented in a way that complies with the Data Protection Act 1998. Where smaller authorities are disclosing information which potentially engages the Data Protection Act 1998, they must ensure that the publication of that information is compliant with the provisions of that Act. The Data Protection Act 1998 does not restrict or inhibit information being published naming councillors, members or senior local authority officers who have taken certain decisions, because of the public interest in the scrutiny of such senior individuals and decision makers. The Data Protection Act 1998 also does not automatically prohibit information being published naming the suppliers with whom the authority has contracts, including sole traders, because of the public interest in accountability and transparency in the spending of public money.

8. This Code complements existing provisions relating to public access to the decision-making process of smaller authorities. Smaller authorities should ensure that they continue to comply with any such provisions, and any subsequent legislation regarding local authority minutes, notices and agendas. Where information would otherwise fall within one of the exemptions from disclosure under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, or Infrastructure for Spatial Information in the European Community (INSPIRE) Regulations 2009 then it is in the discretion of the smaller authority whether or not to rely on that exemption or publish the data. 2

[Note 2 The most relevant exemptions under the Freedom of Information Act 2000 are those relating to law enforcement, for example information which may prejudice a current fraud investigation, (section 31), personal data (section 40) and information provided in confidence (section 41).]

Commercial confidentiality

9. The Government has not seen any evidence that publishing details about contracts entered into by smaller authorities would prejudice procurement exercises or the interests of commercial organisations, or breach commercial confidentiality unless specific confidentiality clauses are included in contracts. Smaller authorities should expect to publish details of contracts newly entered into – commercial confidentiality should not, in itself, be a reason for smaller authorities to not follow the provisions of this Code. Therefore, smaller authorities should consider inserting clauses in new contracts allowing for the disclosure of data in compliance with this Code.
Part 2: Information which should be published

10. Smaller authorities should publish:
   a. all items of expenditure above £100 (see paragraphs 13 - 15);
   b. end of year accounts (see paragraphs 16 and 17),
   c. annual governance statement (see paragraphs 18 and 19),
   d. internal audit report (see paragraphs 20 – 22),
   e. list of councillor or member responsibilities (see paragraph 23), and
   f. the details of public land and building assets (see paragraphs 24 - 27),
   g. Minutes, agendas and meeting papers of formal meetings (see paragraphs 29 and 30).

Part 2.1: Information to be published annually

11. The data and information in this Part (2.1) must be published:
   ☐ on the first occasion, not later than 1 July 2015, and
   ☐ thereafter, not less than annually and not later than 1 July in the year immediately following the
accounting year to which it relates.

12. This is particularly important to enable local Government electors, council tax payers and
ratepayers to scrutinise financial information so that they are able to exercise their rights to question
and make objections to the auditor.

All items of expenditure above £100

13. Smaller authorities should publish the details of each individual item of expenditure above £100.
Publishing a complete list of expenditure transactions will also meet this requirement. Expenditure
information should be published for each individual spending transaction above £100 rather than each
item bought.4

14. For each individual item of expenditure above £100 the following information must be published:
   a. date the expenditure was incurred,
   b. summary of the purpose of the expenditure, s
   c. amounts, and
   d. Value Added Tax that cannot be recovered.

[3 The threshold should be, where possible, the net amount excluding recoverable Value Added Tax
4 For example, it is sufficient to group all items in a stationary order as one item of expenditure.
5 This could be the descriptor that authorities use in their accounting system providing it gives a clear sense of why
the expenditure was incurred or what it purchased or secured for the local authority. ]

15. Copies of all books, deeds, contracts, bills, vouchers, receipts and other related documents do not
need to be published, but should remain available for inspection during the specified inspection period
set out under regulation 14 of the Accounts and Audit (England) Regulations 20116, or under any
equivalent regulations made under section 32 of the Local Audit and Accountability Act 2014. The right
to inspect can be exercised on giving reasonable notice.

[Note 6 S.I. 2011/817]

End of year accounts

16. Smaller authorities should publish their statement of accounts according to the format included in
the Annual Return form. Publication of the relevant page of the completed Annual Return form will
meet this requirement. The statement of accounts must be approved and signed by the Responsible Financial Officer and the Chairman of the meeting approving the statement of accounts.

17. The statement of accounts should be accompanied by:
   a. a copy of the bank reconciliation for the relevant financial year,
   b. an explanation of any significant variances (e.g. more than 10-15 percent, in line with proper practices) in the statement of accounts for the relevant year and previous year, and
   c. an explanation of any differences between ‘balances carried forward’ and ‘total cash and short term investments’, if applicable.

Annual governance statement

18. Smaller authorities should publish their annual governance statement according to the format included in the Annual Return form. Publication of the relevant page of the completed Annual Return form will meet this requirement. The annual governance statement should be signed by the Chairman and Clerk of the smaller authority.

19. Where the governance statement contains any negative responses, these should be explained fully, including how any weaknesses will be addressed. As referred to paragraphs 7 and 8, when publishing this information smaller authorities should consider whether the Data Protection Act 1998 imposes any restrictions or constraints on such publication and whether any of the information would fall within an exemption under the Freedom of Information Act 2000 and therefore could, or should, be withheld from publication.

Internal audit report

20. Smaller authorities should publish their annual internal audit report according to the format included in the Annual Return form. Publication of the relevant page of the completed Annual Return form will meet this requirement. The internal audit report should be signed by the person who carried out the internal audit.

21. Where the internal audit report contains any negative response to the internal controls objectives, these should be explained fully, including how any weaknesses will be addressed. As referred to paragraphs 7 and 8, when publishing this information smaller authorities should consider whether the Data Protection Act 1998 imposes any restrictions or constraints on such publication and whether any of the information would fall within an exemption under the Freedom of Information Act 2000 and therefore could, or should, be withheld from publication.

22. Where the response to any internal controls objectives is ‘not covered’, an explanation of when the most recent internal audit work was completed in this area and when it is next planned should be provided. If coverage is not required, an explanation stating why coverage is not needed should be provided.

List of councillor or member responsibilities

23. Smaller authorities should publish a list of councillor or member responsibilities. The list should include the following information:
   a. names of all councillors or members of the authority,
   b. committee or board membership and function (if Chairman or Vice-Chairman) of each councillor or member, and
   c. representation on external local public bodies (if nominated to represent the authority or board) of each councillor or member.

Details of public land and building assets
24. Parish councils and port health authorities should publish details of all public land and building assets. Where this information is included in the authority’s asset and liabilities register, this register may be published in its entirety or as an edited version displaying only public land and building assets.

25. Internal drainage boards should only publish the details of registered land and buildings that have a market value and which appear in their Fixed Assets Register.

26. When publishing the required data, parish councils, port health authorities and internal drainage boards should publish the following information in relation to each land and building asset:

   a. description (what it is, including size/acreage),
   b. location (address or description of location),
   c. owner/custodian, e.g. the authority or board manages the land or asset on behalf of a local charity,
   d. date of acquisition (if known),
   e. cost of acquisition (or proxy value), and
   f. present use.

[Note 7 For example, street number, street name, postal town and postcode; or map reference using Ordinance Survey grid reference]

27. Charter trustees will not be required to publish any land or asset information since they are not permitted to own either land or buildings under the Charter Trustees Order (1974) and therefore will not hold any relevant information.

Part 2.2: Information to be published more frequently than annually

28. The data and information referred to in this Part (2.2) must be published:
   □ not later than the occasions specified in Paragraphs 29 and 30

Minutes, agendas and papers of formal meetings

29. Smaller authorities should publish the draft minutes from all formal meetings (i.e. full council or board, committee and sub-committee meetings) not later than one month after the meeting has taken place. These minutes should be signed either at the meeting they were taken or at the next meeting.

30. Smaller authorities should also publish meeting agendas, which are as full and informative as possible, and associated meeting papers not later than three clear days before the meeting to which they relate is taking place.

Part 3: Method of publication

31. Public data should be as accurate as possible at first publication. While errors may occur, the publication of information should not be unduly delayed to rectify mistakes. Instead, publication should be used to help address any imperfections and deficiencies. The best way to achieve this is by having robust information management processes in place. Where errors in public data are discovered, or files are changed for other reasons (such as omissions), smaller authorities should publish revised information making it clear where and how there has been an amendment.

32. The data and information specified in this Code must be published on a website which is publicly accessible free of charge. For example, one way that this requirement could be achieved could be by publishing the data on the smaller authority’s website or that of the billing authority in its area (district or London borough or unitary council).
Annex A: Transparency Code for Smaller Authorities

Parish councils, internal drainage boards, charter trustees and port health authorities with an annual turnover not exceeding £25,000 should publish:

**Information which should be published**

**Information title**

**All items of expenditure above £100**

Annual publication no later than 1 July in the year immediately following the accounting year to which it relates. Publish details of each individual item of expenditure. Copies of all books, deeds, contracts, bills, vouchers, receipts and other related documents do not need to be published but should remain available for inspection.

For each individual item of expenditure the following information must be published:

a. date the expenditure was incurred,
b. summary of the purpose of the expenditure,
c. amount, and
d. Value Added Tax that cannot be recovered.

**End of year accounts**

Annual publication no later than 1 July in the year immediately following the accounting year to which it relates. Publish signed statement of accounts according to the format included in the Annual Return form. It should be accompanied by:

a. a copy of the bank reconciliation for the relevant financial year,
b. an explanation of any significant variances (e.g. more than 10-15 percent) in the statement of accounts for the relevant year and previous year, and
c. an explanation of any differences between ‘balances carried forward’ and ‘total cash and short term investments’, if applicable.

**Annual governance statement**

Annual publication no later than 1 July in the year immediately following the accounting year to which it relates. Publish signed annual governance statement according to the format included in the Annual Return form. Explain any negative responses to governance statements, including how any weaknesses will be addressed.
### Internal audit report

Annual publication no later than 1 July in the year immediately following the accounting year to which it relates.

Publish signed internal audit report according to the format included in the Annual Return form.

Explain any negative response to the internal controls objectives, including how any weaknesses will be addressed.

Explain any ‘not covered’ responses to internal controls objectives.

### List of councillor or member responsibilities

Annual publication of councillor or member responsibilities no later than 1 July in the year immediately following the accounting year to which it relates, including:

a) names of all councillors or members,

b) committee or board membership and function (if Chairman or Vice-Chairman), and

c) representation on external local public bodies (if nominated to represent the authority or board).

### Location of public land and building assets

Annual publication no later than 1 July in the year immediately following the accounting year to which it relates.

Parish councils and port health authorities to publish details of all public land and building assets – either in its full asset and liabilities register or as an edited version.

Internal drainage boards to only publish details of registered land and buildings that have a market value and appear in Fixed Assets Register.

The following information must be published:

a) description (what it is, including size/acreage),

b) location (address or description of location),

c) owner / custodian, e.g. the authority manages the land or asset on behalf of a local charity,

d) date of acquisition (if known),

e) cost of acquisition (or proxy value), and

f) present use.

### Minutes, agendas and papers of formal meetings

Publication of draft minutes from all formal meetings not later than one month after the meeting has taken place.

Publication of meeting agendas and associated meeting papers not later than three clear days before the meeting to which they relate is taking place.
### Annex B: Proposed timeline for smaller authorities’ publication of information

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>December 2014</td>
<td>Transparency Code for Smaller Authorities issued as recommended practice</td>
</tr>
<tr>
<td>By end March 2015</td>
<td>Subject to Parliamentary approval Regulations to come into force to require compliance with Transparency Code for Smaller Authorities</td>
</tr>
<tr>
<td>Spring 2015</td>
<td>Proposed new burdens funding for smaller authorities to assist compliance with the Code</td>
</tr>
<tr>
<td>July 2015</td>
<td>Publication by smaller authorities of first annual set of data completed</td>
</tr>
<tr>
<td>April 2015 -</td>
<td>Publication of draft minutes from all formal meetings, not later than one month after each meeting, and of meeting agendas and associated meeting papers not later than three clear days before the meeting takes place</td>
</tr>
<tr>
<td>July 2016</td>
<td>Publication of second annual set of data completed</td>
</tr>
</tbody>
</table>