



## MULBERRY & CO

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Our Ref: MARK/PEA001

Mr T Allen  
Peacehaven Town Council  
Community House, Meridian Centre  
Meridian Way  
Peacehaven  
East Sussex  
BN10 8BB

21 October 2022

Dear Tony

**Re: Peacehaven Town Council**  
**Internal Audit Year Ended 31 March 2023 – Interim Audit report**

### **Executive summary**

Following completion of our interim internal audit on 21 October 2022 we enclose our report for your kind attention and presentation to the council. The audit was conducted in accordance with current practices and guidelines and testing was risk based. Whilst we have not tested all transactions, our samples have where appropriate covered the entire year to date.

Our report is presented in the same order as the assertions on the internal auditor report within the published AGAR. The start of each section details the nature of the assertion to be verified. Testing requirements follow those detailed in the audit plan previously sent to the council, a copy of this is available on request. The report concludes with an opinion as to whether each assertion has been met or not at the interim audit. Where appropriate **recommendations for action are shown in bold text and are summarised in the table at the end of the report.**

Our sample testing did not uncover any errors or misstatements that require reporting to the external auditor at this time, nor did we identify any significant weaknesses in the internal controls such that public money would be put at risk.

It is clear the council takes governance, policies and procedures seriously and I am pleased to report that overall, the systems and procedures you have in place are fit for purpose and whilst my report may contain recommendations to change these are not indicative of any significant failings, but rather are pointers to improving upon an already well-ordered system.

It is therefore our opinion that the systems and internal procedures at Peacehaven Town Council are well established and followed.

### **Regulation**

The Accounts and Audit Regulations 2015 require smaller authorities, each financial year, to conduct a review of the effectiveness of the system of internal control and prepare an annual governance statement in accordance with proper practices in relation to accounts. In addition to this, a smaller authority is required by Regulation 5(1) of the Accounts and Audit Regulations 2015 to “undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.”

Internal auditing is an independent, objective assurance activity designed to improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The purpose of internal audit is to review and report to the authority on whether its systems of financial and other internal controls over its activities and operating procedures are effective.

Internal audit's function is to test and report to the authority on whether its specific system of internal control is adequate and working satisfactorily. The internal audit reports should therefore be made available to all Members to support and inform them when they considering the authority's approval of the annual governance statement.

### Independence and competence

Your audit was conducted by Andy Beams of Mulberry & Co. We confirm we are independent from the management of the financial controls and procedures of the council and neither the internal auditor or the firm have any conflicts of interest with the audit client, nor do they provide any management or financial assistance to the client.

Your auditor has over 30 years' experience in the financial sector with the last 12 years specialising in local government.

### Engagement Letter

An engagement letter was previously issued to the council covering the 2022/23 internal audit assignment. Copies of this document are available on request.

### Planning and inherent risk assessment

The scope and plan of works including fee structure was issued to the council under separate cover. Copies of this document are available on request. In summary, our work will address each of the internal control objectives as stated on the Annual Internal Audit Report of the AGAR. As part of the inherent risk assessment, we have concluded that:

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

It is our opinion that the inherent risk of error or misstatement is low, and the controls of the council can be relied upon and as such substantive testing of individual transactions is not required. Testing to be carried out will be "walk through testing" on sample data to encompass the period of the council year under review.

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## A. BOOKS OF ACCOUNT

### **Internal audit requirement**

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

### **Audit findings**

The interim audit was conducted on site with the Clerk and RFO. The required information advised in advance of the visit was available for review, and I have the impression that accounting records are neatly maintained and easily accessible. Other information was reviewed through discussion with the Clerk and RFO and a review of the council website

[www.peacehaventowncouncil.gov.uk](http://www.peacehaventowncouncil.gov.uk)

The council continues to use the Rialtas Business Solutions (RBS) for recording the day-to-day financial transactions of the council. This is an industry specific package and I make no recommendation to change. The Clerk and RFO both have access to the system are fully familiar with it, with the Information and Bookings Officer uses the bookings part of the system.

## B. FINANCIAL REGULATIONS, GOVERNANCE AND PAYMENTS

### **Internal audit requirement**

*This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for.*

### **Audit findings**

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

The External Auditor's Report for 2021/22 was qualified. The External Auditor commented 'The AGAR was not accurately completed before submission for review. The figure in Section 2, Box 9 of the prior year comparative column does not agree to the prior year final signed AGAR. The figure should read £3,528,637.'

The External Auditor's Report and Certificate have been published on the council website along with the Notice of Conclusion of Audit. This was reported to council at the meeting held on 27 September 2022.

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

I confirmed by sample testing that councillors sign "Acceptance of Office" forms. The council website provides details of each councillor and includes details of each individual Register of Members Interests.

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

As the council's income and expenditure exceeds £25,000, it is not a statutory requirement to follow the requirements of the Local Government Transparency Code, although it is recommended best practice to do so. The council has established a transparency page on the website, although upon review some of the information has not been kept up to date and is inconsistent with information published elsewhere on the website. I recommend reviewing a review of the information to ensure it is full up to date.

*Confirm that the council is compliant with GDPR*

The council is fully aware of GDPR and has undergone training. It was noted the council has established common email addresses for all councillors. This is recommended because it gives a natural segregation between work and personal lives, making it clear beyond doubt in what capacity a councillor is acting. In addition to this it gives control to the council, adds a degree of professionalism and in the event of a FOI request limits access to personal computers.

The council has a Privacy Notice and Accessibility Statement on the home page of its website, and it is clear the council has made every effort to comply with the website requirements.

*Confirm that the council meets regularly throughout the year*

In addition to full council, the council has a committee structure. There is a diary of future meeting dates available on the website along with historic agendas and minutes,

*Check that agendas for meetings are published giving 3 clear days' notice.*

The Clerk was able to demonstrate that at least 3 clear days' notice is given on agendas. Whilst we have not tested every single committee and council meeting there was no evidence of non-compliance in giving three clear days' notice of the meeting. I note that non-confidential supporting papers are also published on the website.

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

Draft minutes are routinely uploaded to the council website.

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

The Standing Orders are based on the current NALC model and were most recently reviewed and adopted by council in May 2022.

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

Financial Regulations are based on the current NALC model and were last reviewed and adopted by council on 10 May 2022. The regulations contain provisions for the approval of spending, setting of budgets, reconciliation of the bank and reporting to council.

*Check that the council's Financial Regulations are being routinely followed.*

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

*FR 4.1. Expenditure on revenue items may be authorised up to the amounts included for that class of expenditure in the approved budget. This authority is to be determined by:*

- *the council for all items over £5,000;*
- *a duly delegated committee of the council for items over £1,000; or*
- *the Clerk, in conjunction with Chairman of Council or Chairman of the appropriate committee, for any items below £1,000*

*Such authority is to be evidenced by a minute or by an authorisation slip duly signed by the Clerk, and where necessary also by the appropriate Chairman.*

*Contracts may not be disaggregated to avoid controls imposed by these regulations.*

*FR 4.5. In cases of extreme risk to the delivery of council services, the Clerk may authorise revenue expenditure on behalf of the council which in the Clerk's judgement it is necessary to carry out. Such expenditure includes repair, replacement or other work, whether or not there is any budgetary provision for the expenditure, subject to a limit of £1,000. The Clerk shall report such action to the chairman as soon as possible and to the council as soon as practicable thereafter.*

Based on the level of financial activity of the council, these authorisation thresholds appear appropriate.

I tested a sample of invoices and found these had been approved in accordance with the thresholds contained within the Financial Regulations, and approval, where needed, recorded in the minutes of meetings.

*Confirm all section 137 expenditure meets the guidelines and does not exceed the annual per elector limit of £8.82 per elector.*

The council has adopted the General Power of Competence (GPC) and the thresholds do not apply.

*Check receipt of VAT refund matches last submitted VAT return.*

The council submits its VAT return on a quarterly basis. I reviewed the most recent submission for the period ended 30 September 2022. This shows a refund amount due of £19,465.12 which I was able to confirm receipt of on the October 2022 statement.

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

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

## C. RISK MANAGEMENT AND INSURANCE

### **Internal audit requirement**

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

### **Audit findings**

The council has a risk management policy and risk assessment record in place, which is reviewed and approved by council annually. I reviewed the financial risk assessment, which contains all the risks typically associated with a council of this size, although the addition of a risk matrix which identifies how the high/medium/low overall risk level was judged may be beneficial.

I confirmed that the council has a valid insurance policy in place with Zurich in a long-term agreement expiring in June 2025. The policy includes Public Liability cover of £15 million, Employers Liability cover of £10 million and a Fidelity Guarantee of £1 million.

**The Fidelity Guarantee is sufficient at present based on the council's balances but should be kept under review to ensure it remains more than the maximum sum held at any point during the year.**

The listed asset cover appears appropriate based on the items recorded on the council's asset register.

## D. BUDGET, PRECEPT AND RESERVES

### **Internal audit requirement**

*The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.*

### **Audit findings**

The council set a precept of £687,081 for 2022/23. With a tax base of 4,752.6, this equates to a band D equivalent of £144.57 (compared to the average in England of £74.81).

A first draft of the 2023/24 budget has been presented to the Policy & Finance Committee and a second draft with alternate options included. The second draft will go the Policy & Finance Committee meeting on 22 November, with the aim to agree the budget and precept at the December 2022 council meeting.

The budget performance information is presented to every Policy & Finance Committee Meeting and to each council meeting. Based on the information made available and a discussion with the Clerk and RFO, I am confident that councillors are presented with sufficient financial information to make informed decisions.

The council holds circa £475,000 in earmarked reserves. These are spread across a range of projects, including Community Infrastructure Levy (CIL). The council also holds £131,000 in the general reserve.

The Joint Panel on Accountability and Governance (JPAG) Practitioner's guide states '*the generally accepted recommendation with regard to the appropriate minimum level of a smaller authority's general reserve is that this should be maintained at between three and twelve months of net revenue expenditure*' (para 5.33).

**The general reserve balance is within the recommended range, but at the lower end and I recommend the council keeps this level under review.**

## E. INCOME

### **Internal audit requirement**

*Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.*

### **Audit findings**

Apart from the precept, the council's primary income sources are from the Café and Hub, room and facility hire, sports club rents, sports pitch hire and allotment rents. Fees and charges are reviewed annually as part of the budget setting process.

The council operates a cash till, and this is balanced regularly by the Information and Bookings Officer, with amounts placed in the safe with the 'z' till listing. This is then checked by the RFO before being banked and entered into the accounting software. The introduction of regular physical checks of the till would enhance the existing measures.

A review of the ledger reports from RBS shows that outstanding amounts are kept to a minimum and the Policy & Finance Committee are kept updated with the information.

## F. PETTY CASH

### **Internal audit requirement**

*Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for.*

### **Audit findings**

The council maintains a minimal petty cash float, which is used for incidental items. The petty cash is maintained by the RFO, and prior approval is obtained before any expenditure.

There is a corporate credit card in place, with cards held by the Clerk and RFO. While both roles would be considered suitable for holding the credit cards, this is not in conformity with Financial Regulation 6.20 which states 'Any corporate credit card or trade card account opened by the council will be specifically restricted to use by the Clerk and shall be subject to automatic payment in full at each month-end. Personal credit or debit cards of members or staff shall not be used under any circumstances.'

The RFO received credit card statements and has set up a separate cashbook within the accounting software to reconcile these monthly. I was able to evidence that appropriate receipts are retained for all credit card entries.

Financial Regulation 6.18 states 'Any Debit Card issued for use will be specifically restricted to the Clerk and will also be restricted to a single transaction maximum value of £500 unless authorised by the Finance and Policy committee in writing before any order is placed.' No such limit appears to be included for a single transaction for the credit card.

**I recommend amending FR 6.20 to read '...restricted to use by the Clerk and RFO...' and amending FR 6.18 to read 'Any debit or credit card issued...'**

## G. PAYROLL

### **Internal audit requirement**

*Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.*

### **Audit findings**

There are fifteen staff members, all of whom have a signed contract of employment, based on the NALC template and are paid in accordance with the NJC scale.

The council uses a third party for processing payroll, who calculates the PAYE and pension deductions and make the BACs salary transfers. Payroll information is compiled by the RFO and checked by the Clerk before submission.

I reviewed the most recent payslips for two staff members and was able to confirm deduction amounts appear correct and they are paid in accordance with the NJC salary scale.

I reminded the Clerk and RFO that only salary, HMRC and pension payments should be included in box 4 on the Annual Governance and Accountability Return (AGAR) and any other staff costs should be recorded in box 6.

There is a councillor allowance scheme in place, paid in two equal instalments through payroll, as required by HMRC regulations.

## H. ASSETS AND INVESTMENTS

### **Internal audit requirement**

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

### **Audit findings**

The council has a fixed asset register which is maintained in an Excel format. The register provides a description of the asset, serial number, model number and manufacturer (where applicable), its date of acquisition, location, useful life estimate, original cost, insurance value and expected replacement cost. The council has many assets, and the register includes a simple summary page stating totals of the different types of assets. This is entirely suitable for a council with assets of this nature.

A check of the register to ensure it is up to date and matches the AGAR information will be completed at the year-end audit.

The council has no PWLB borrowing nor long-term investments.

## I. BANK AND CASH

### **Internal audit requirement**

*Periodic and year-end bank account reconciliations were properly carried out.*

### **Audit findings**

Bank reconciliations are completed monthly by the RFO. I was able to view recent reconciliations and confirm balances to original bank statements. There were no errors identified in the reconciliations.

Financial Regulation 2.2 states 'On a regular basis, at least once in each quarter, and at each financial year end, a member other than the Mayor or a cheque signatory shall be appointed to verify bank reconciliations (for all accounts) produced by the RFO. The member shall sign the reconciliations and the original bank statements (or similar document) as evidence of verification. This activity shall on conclusion be reported, including any exceptions, to and noted by the Policy & Finance Committee.'

While my checking confirmed that the reconciliations are being completed accurately, **there was no evidence available of the verification on of the reconciliations through the signing of documentation as specified in the Financial Regulations. The Clerk noted that these will need to be signed at least quarterly and evidenced to me to allow a positive response to this control assertion on the AGAR.**

**J. YEAR END ACCOUNTS****Internal audit requirement**

*Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.*

**Audit findings**

Testing to be conducted at final audit.

**K. LIMITED ASSURANCE REVIEW****Internal audit requirement**

*IF the authority certified itself as exempt from a limited assurance review in 2020/21, it met the exemption criteria and correctly declared itself exempt. (If the authority had a limited assurance review of its 2020/21 AGAR tick “not covered”)*

**Audit findings**

Testing to be conducted at final audit.

**L: TRANSPARENCY****Internal audit requirement**

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

**Audit findings**

Testing to be conducted at final audit.

**M: EXERCISE OF PUBLIC RIGHTS - INSPECTION OF ACCOUNTS****Internal audit requirement**

*The authority has demonstrated that during summer 2022 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations.*

**Audit findings**

Inspection – key dates	2021/22 Actual
Date AGAR signed by council	10 May 2022
Date inspection notice issued	10 June 2022
Inspection period begins	13 June 2022
Inspection period ends	22 July 2022
Correct length (30 working days)	Yes
Common period included (first 10 working days of July)	Yes

I am satisfied the requirements of this control objective were met for 2021/22, and assertion 4 on the Annual Governance Statement can therefore be signed off by the council.

## **N: PUBLICATION REQUIREMENTS**

### **Internal audit requirement**

*The authority has complied with the publication requirements for 2021/22. Under the Accounts and Audit Regulations 2015, authorities must publish the following information on the authority website / webpage.*

*Before 1 July 2022 authorities must publish:*

- *Notice of the period for the exercise of public rights and a declaration that the accounting statements are as yet unaudited*
- *Section 1 - Annual Governance Statement 2021/22, approved and signed, page 4*
- *Section 2 - Accounting Statements 2021/22, approved and signed, page 5*

*Not later than 30 September 2022 authorities must publish:*

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

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

### **Audit findings**

I was able to confirm that the Notice of Public Rights is published on the council website along with the Notice of Conclusion of Audit and External Auditor Report and Certificate and the publication requirements for 2021/22 have been met.

## **O. TRUSTEESHIP**

### **Internal audit requirement**

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

### **Audit findings**

The council has no trusts.

**Achievement of control assertions at interim audit date**

Based on the tests conducted during the interim audit, our conclusions on the achievement of the internal control objectives are summarised in the table below. A further review and update of this opinion will be conducted at the final audit.

	INTERNAL CONTROL OBJECTIVE	YES	NO	NOT COVERED
A	Appropriate accounting records have been properly kept throughout the financial year	√		
B	This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for	√		
C	This authority assesses the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these	√		
D	The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	√		
E	Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for	√		
F	Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for	√		
G	Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	√		
H	Asset and investments registers were complete and accurate and properly maintained.	√		
I	Periodic bank account reconciliations were properly carried out during the year.		√	
J	Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	√		
K	If the authority certified itself as exempt from a limited assurance review in 2021/22, it met the exemption criteria and correctly declared itself exempt. <i>(If the authority had a limited assurance review of its 2020/21 AGAR tick "not covered")</i>			√
L	The authority publishes information on a free to access website/webpage up to date at the time of the internal audit in accordance with any relevant transparency code requirements			√
M	The authority, during the previous year (2021-22) correctly provided for the period for the exercise of public rights as required by the Accounts and Audit Regulations <i>(evidenced by the notice published on the website and/or authority approved minutes confirming the dates set)</i> .	√		
N	The authority has complied with the publication requirements for 2021/22 AGAR.	√		
O	Trust funds (including charitable) – The council met its responsibilities as a trustee.			√

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

Yours sincerely



**Andy Beams**

**For Mulberry & Co**

**Interim Audit - Points Carried Forward**

<b>Audit Point</b>	<b>Audit Findings</b>	<b>Council comments</b>
<b>RISK MANAGEMENT AND INSURANCE</b>	The Fidelity Guarantee is sufficient at present based on the council's balances but should be kept under review to ensure it remains more than the maximum sum held at any point during the year.	
<b>BUDGET, PRECEPT AND RESERVES</b>	The general reserve balance is within the recommended range, but at the lower end and I recommend the council keeps this level under review.	
<b>PETTY CASH</b>	I recommend amending FR 6.20 to read '...restricted to use by the Clerk and RFO...' and amending FR 6.18 to read 'Any debit or credit card issued...'	
<b>BANK AND CASH</b>	There was no evidence available of the verification on of the reconciliations through the signing of documentation as specified in the Financial Regulations. The Clerk noted that these will need to be signed at least quarterly and evidenced to me to allow a positive response to this control assertion on the AGAR.	