



6 Uplands Road
Farnham GU9 8BP

Greg Burt
Clerk to Billingshurst Parish Council

8 June 2022

Dear Greg

Billingshurst Parish Council - Internal Audit 2021-22

The internal audit of Billingshurst Parish Council for the 2021-22 financial year is now complete. I am pleased to be able to report that I have signed off the internal audit section of the Annual Governance and Accountability Return (AGAR) for 2021-22 with one minor exception:

Control Objective M – Inspection Periods

The external auditors raised an audit point in the 20-21 audit certificate stating that the inspection period for 20-21 was longer than the mandatory 30 days. Whilst I consider this point to be rather petty, the Council must follow the requirement of the internal auditor to mark assertion 4 on the annual governance statement as “NO” when completing the 21-22 annual governance statement.

As stated in the engagement letter, the scope of our work is limited to completing the audit testing and enquiries we deem necessary to complete Section 4 of the Annual Report for Local Councils in England. We do not provide assurance over or accept responsibility for areas of work not included in this scope, unless specifically agreed with the Council during the financial year.

In providing internal audit services we are not conducting a financial statement audit in accordance with standards and guidelines issued by the Audit Practices Board and our procedures are not designed to provide assurance over the reliability and quality of your financial statements and management information – that is the job of external audit.

We are required by the Annual Internal Audit Report included in the Annual Governance and Accountability Return (AGAR) to review controls in place at the Council against predefined control assertions. These control assertions are set out below, together with the results of my internal audit work for 2021-22.

The audit was carried out in two stages. The interim audit was carried out on 15 November 2021, this concentrated on in year financial transactions and governance controls. The final audit was carried out during the week of 5 June 2022 and concentrated on the statement of accounts and balance sheet.

I am required by Section 4 of the Annual Governance and Accountability Return (AGAR) to review controls in place at the Council against predefined control assertions. These control assertions are set out below, together with the results of testing carried out at the interim audit.

A - Appropriate books of account have been kept properly throughout the year

Interim Audit

The Council continues to use RBS, an industry specific accounting package. The RBS system is used to report and record the financial transactions of the Council. A review of the cashbook shows that all data fields are being entered, supporting documentation is easily located from references recorded on the general ledger. Reconciliations tested were up to date at the time of the audit.

I confirmed the opening balances were correct. Box 7 on the 20-21 audited accounts stated £377,712. This has been agreed to the period 0 balance sheet on RBS.

I have confirmed that the Council's VAT returns are up to date, with the most recent claim for the quarter to 30 September 2021 submitted to HMRC 8.11.21. This has been agreed to VAT figures produced by the RBS accounting system. The Council's VAT control account at 30.9.21 showed a balance of £10,727. VAT reclaimed amounted to £14,926. The difference of £4,199 is due to an overclaim of VAT which was overclaimed by the Council 2 years ago. The Clerk has contacted HMRC and is attempting to rectify this matter.

I checked access controls to the Council's Accounting system. The Clerk is the only officer with access to the Parish Council Finance system

Final Audit

The accounting statements have been agreed back to balance sheet and income and expenditure reports produced from the RBS Accounting system. All comparatives reported in the financial statements have been agreed back to the audited 2020-21 accounts, as published on the Council website. Box 5 (Loan Repayments) and Box 6 (all other payments) comparative balance have been restated due to misclassification of a £10,832 payment in 20-21.

The Council's year end VAT return has been completed, and VAT reclaimed can be agreed to a schedule of transactions extracted from RBS. The VAT return was submitted to HMRC on 17 May. There continues to be a £4,175 imbalance on the VAT account on the Council's balance sheet. The Council believes it overclaimed VAT by this amount 2 years ago, and continues to provide for this on the balance sheet. HMRC have been informed but no response received.

The Council reviewed my interim audit report at the November 2021 meeting of Full Council.

I am satisfied that the Council met this control objective.

B - The Council's financial regulations have been met, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for

Interim Audit

Financial Regulations and Standing Orders were reviewed and reapproved at Full Council in May 2021. Both documents are based on NALC templates, there have been no significant changes this year.

Council is given authority to spend via the annual budget process. The Council has a robust procedure in place to ensure that all expenditure is authorised in line with financial regulations. I selected a sample of 8 higher value transactions at random from the cashbook for the first 7 months of the financial year and I was able to confirm for all transactions that:

- Transactions could be agreed back to invoice
- Payment approval, , with evidence of councillor sign off on invoice or purchase order, was in line with financial regulations
- VAT accounting correct
- Expenditure appropriate for the Council
- Where applicable, competitive tender processes set out in financial regulations were followed – I confirmed quotes were sought and decision to appoint contractor was approved at Council for drainage works and works on the High Street property

The Council continues to make payment by cheque, a matter I have commented on in previous audits. Progressing is being made, with the Community Centre moving to BACS payments in the near future. I recommend that the Council moves to BACS payments by the start of the 2022-23 financial year, and that Financial Regulations are reviewed to document the new payment process in advance of this .

I can confirm that the Council is compliant with the 2015 Transparency Code. Information is disclosed in the Finance section of the website, and information on payments is up to date, to the end of quarter 2 2021-22. I will test other information published after the annual update.

Final Audit

Non pay expenditure per box 6 to the accounts amounted to £529,202, up from £327,520(restated) in 2020-21.

I tested a further sample of expenditure transactions selected at random from cashbooks for months 6-12 of the financial year. For all transactions sampled, I was able to confirm the following:

- Entry in cashbook agreed to invoice
- Expenditure appropriate for this council
- Evidence of sign off on cheque stub and invoice by 2 councillors

- Payment checked to bank account
- Payment approved at Council meeting
- VAT correctly accounted for

The Council continues to demonstrate compliance with financial regulations when making payments to third parties.

Loan payments per box 5 to the accounts were £41,920 (20-21 £41,920 restated). 1 transaction was sampled, cashbook agreed to PWLB loan repayment demand.

I am satisfied that the Council met this control objective.

C - The Council assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.

Interim Audit

The Council has a risk management strategy in place and monitors and reviews risk on an ongoing basis. The RFO has confirmed that this will be reviewed after Christmas, and will go before Full Council by the end of March 2022.

The Council has recently changed insurer. A new policy commenced with Hiscox Insurance on 13 November 2021. I have confirmed the policy was in date at the time of my audit, with cover in place until the policy is cancelled. Asset cover appears consistent with the asset register. The Community Centre is insured for £3.3million. Fidelity cover is set at £500k, which is sufficient.

The Council has a well-established process for backing up computer data, with backups held at remote locations. I have confirmed that the Council backs up computer data to a cloned server in the Community Centre, and to a cloud-based solution hosted by an external provider.

I am satisfied this control objective has been met.

Final Audit

The Council completed the annual risk management review at the Full Council meeting in March 2022 (Minute 24/22). The risk management review is a comprehensive document, setting out the Council's approach to identifying and managing risk and controls in place to mitigate against these risks. There is evidence of update in year, and a minute records the Council's review.

I am satisfied that the Council is meeting this control objective.

D - The annual precept requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.

Interim Audit

The Council demonstrated that work is under way on the 2022-23 budget. A budget workshop was held in November, the draft budget will be considered in detail at the Finance and General Purposes Committee in December, with final approval due at Full Council in January. All precepting authority deadlines should be met.

Budget monitoring reports continue to be presented to meetings of the Finance and General Purposes Committee, and this is minuted. Papers are comprehensive and a short narrative report is now produced by the Clerk. I reviewed the quarter 2 report, no material overspends not explained by reserves finding were identified. Reserves will be examined at the year end audit.

I am satisfied the Council is meeting this control objective.

Final Audit

Reserves at 31 March 2022 were £209,009 (2020-21 £377,312).

General reserves at year end were £25K. This represents 6 % of precept, which is significantly below suggested levels set out in the NALC Practitioners' Guide. This recommends that general reserves should be held at between 25- 100% of precept. For a Council such as Billingshurst, I would expect to see a general reserve around 30- 50% of precept.

The Council held earmarked reserves of £183K at 31.3.22. The main balances were

- Skate Park Reserve £100K
- CIL £48K

I understand that the Council is about to receive a commuted sum of £300K from the District Council, with no restrictions on how this may be used.

The Council must review its reserve balances as a matter of urgency. This review should aim to complete the following:

- Review of the general reserve balance. The Council should ensure general reserves are held in line with NALC recommendations
- Ensure reserves are in place for restricted monies such as CIL
- Ensure proper contingency reserves are in place , for example to maintain assets, legal fees and elections
- Allocate funding for future projects, if funds permit.

The Council agreed the budget for 22-23 at the Full Council meeting in January 2022, Minute 09/22 . A precept of £444,735 was agreed for the forthcoming financial year. All precepting authority deadlines were met.

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

Interim Audit

I agreed 2 large CIL receipts for £24K and £28K to remittance advice notes issues by the District Council. I will carry out further testing at my year end audit dependent on income received in the accounts.

Final Audit

Precept per box 2 to the accounts was £408,779 (20-21 £373,325)

This has been agreed to third party documentation supplied by Central Government

Income per box 3 to the accounts was £222,931 (20-21 £194,270).

I tested a further income credit of £19K from Horsham DC for Highway Cleansing. This was agreed to notification from the District Council.

The Council was owed £40,000 on 31 March 2022 by Sussex Clubs for Young People. This has been checked to email confirmation from Sussex Clubs and payment of this money was received in bank 4 April 2022. I recommended that the Council should amend the accounts to reflect this transaction. The accounts were amended.

I am satisfied the Council is meeting this control objective.

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

The Council has a petty cash balance of £100 – I counted this and agreed the accounting system balance to cash plus receipts held in cash box.

G- Salaries to employees and allowances to members were paid in accordance with council approvals, and PAYE and NI requirements were properly applied.

Interim and Final Audit

Staff costs per box 4 to the accounts were £228,891 (20-21 £215,051). I have reviewed RBS reports and it appears that correct costs have been included within the staffing costs cell on the statement of accounts.

Payroll is processed by West Sussex County Council. I tested the July 2021 payroll in detail. I was able to confirm the payroll posted to the general ledger back to the payroll summary produced by the payroll agency. . I agreed pay for 3 officers back to individual payroll records and gross pay for 2 officers was agreed to the approved rate of pay recorded

in the 21-22 payroll budget. |The rate of pay for the third officer was agreed to contract of employment. I am satisfied that the Council has satisfactory controls over payroll.

H - Asset and investments registers were complete and accurate and properly maintained.

Final Audit

Fixed assets per box 9 to the accounts were £ 1,758,865 (20-21 £1,779,179). I have agreed the balance in the accounts back to the asset register. The asset register appears complete and to record assets at cost or proxy cost, as required by regulations, with sufficient detail to locate all assets listed.

Changes in asset register value year on year are supported by schedules of assets added and removed from the asset register, again at cost. Fixed assets increased by £24K, this is mainly due to the addition of the multi unit at Manor Park and safety matting at Station Road. The removal of the skate park resulted in a £45K reduction in the fixed asset balance.

I am satisfied that the asset register can be reconciled to the fixed asset balance recorded in the accounts.

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

Interim Audit

The Council holds 3 bank accounts. Reconciliations for all bank accounts are carried out regularly and in accordance with regulations. This is clearly evidenced in the Council's bank reconciliation file. The October 2021 bank reconciliation was tested in detail. I confirmed the following.

- All balances on the bank reconciliation were agreed back to bank statements / cashbooks
- Cashbook /bank statement differences were explained by schedules of unrepresented cheques / lodgments.
- Bank reconciliations were reported to a meeting of the Policy and Finance Committee, and this review was minuted.

The face of the bank statements and the bank reconciliations had been not yet been signed off by the reviewing councillor, this was due at next meeting. I therefore checked that the review of the bank reconciliation for September 2021 had been reviewed, this had been done and properly evidenced.

I discussed the Council's Investment policy. The Clerk confirmed that the Council is looking to move some of its cash balances to different banks in the near future. I will therefore review this at my final audit

Final Audit

Borrowings per box 10 to the accounts were £404,459 (20-21 £ 432,056) This has been agreed to the year end PWLB loan statement published on the Debt Management Office website.

Cash per box 8 to the accounts was £197,542 (20-21 £355,127) I reperformed the year end bank reconciliations. All balances on the bank reconciliation were agreed to the accounting system and bank statements. Unpresented cheques balance was agreed to a schedule of cheques on the reconciliation. The three largest cheques were tested, and confirmed to banking in April 2022.

The Clerk confirmed that the move to the implementation of BACS for payments is progressing. The Billingshurst Centre will move to this process in the next few weeks, with the Council due to follow after this.

The Council has an investment policy in place. I recommend that this is reviewed alongside the reserves review recommended in section D, to ensure the investment policy is still consistent with Council objectives.

I am satisfied that the Council met this control objective.

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, were supported by an adequate audit trail from underlying records, and

Final Audit

Billingshurst PC has produced accounts on an accruals basis, this is required as income / expenditure is above £200k. A reconciliation between Box 7-8 of the accounts has been prepared, for external audit review, and creditor and debtor listings support this reconciliation.

An explanation of year-on-year variances had not been prepared at the time of my audit, I am happy to review this document prior to submission to external audit.

I am satisfied this control objective has been met.

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

As a larger Council, with income / expenditure in excess of £200K, Billingshurst is required to follow the 2015 Transparency Code. I was able to confirm that data required by the Code could be located at various pages on the Council website, and specifically confirmed that the following information was up to date

- Grants awarded
- Payments over £500

M – Inspection Periods

The external auditors have raised an audit point in the 20-21 audit certificate stating that the inspection period for 20-21 was longer than the mandatory 30 days. Whilst I consider this point to be rather petty, the Council must follow the requirement of the internal auditor to mark assertion 4 on the annual governance statement as “NO” when completing the 21-22 annual governance statement.

N – Compliance with Publishing Requirements 20-21 Accounts

The external audit opinion was dated 28 September 2021. A conclusion of audit announcement has been published on the Council website, signed by the Clerk, dated 29 September 21. The audit opinion was reported to Full Council on 3 November 2021. The website link to the audited annual return was broken at the time of the audit. The Accounts / Governance Statement and Audit Opinion for 21-22 should be loaded on to the website.

O- Trust funds (including charitable) The council met its responsibilities as a trustee.

The Billingshurst Community and Conference Centre is a charitable trust of which the Parish Council is the sole managing trustee. The 20-21 accounts have been submitted to the Charity Commission, the Charity Commission website shows a submission date of 23 November 21, well inside the regulatory deadline.

Thanks for your assistance with the audit. I attach my invoice for your consideration together with the internal audit report from the AGAR.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Platten'.

Mike Platten CPFA

Points Forward – Action Plan - Interim Audit

Matter Arising	Recommendation	Council Response – Final Audit
<p>The Council continues to make payment by cheque, a matter I have commented on in previous audits. Progressing is being made, with the Community Centre moving to BACS payments in the near future.</p>	<p>I recommend that the Council moves to BACS payments by the start of the 2022-23 financial year, and that Financial Regulations are reviewed to document the new payment process in advance of this</p>	<p>Community Centre about to go live with BACS payments</p>
<p>The external auditors have raised an audit point in the 20-21 audit certificate stating that the inspection period was longer than the mandatory 30 days.</p>	<p>Whilst I consider this point to be rather petty, the council must follow the requirement of the internal auditor to mark assertion 4 on the annual governance statement as “NO” when completing the 21-22 annual governance statement.</p>	<p>Noted – Internal Audit have reminded the Clerk</p>
<p>The website link to the audited annual return was broken at the time of the audit.</p>	<p>The Accounts / Governance Statement and Audit Opinion for 21-22 should be loaded on to the website.</p>	<p>Link still broken at final audit - needs to be fixed</p>

Points Forward – Action Plan - Final Audit

Matter Arising	Recommendation	Council Response – Final Audit
<p>General Reserves are significantly below recommended levels</p>	<p>The Council must review its reserve balances as a matter of urgency. This review should aim to complete the following:</p> <ul style="list-style-type: none"> - Review of the general reserve balance. The Council should ensure general reserves are held in line with NALC recommendations - Ensure reserves are in place for restricted monies such as CIL - Ensure proper contingency reserves are in place , for example to maintain assets, legal fees and elections - Allocate funding for future projects, if funds permit 	
<p>The Council has an Investment Policy in place.</p>	<p>I recommend that this is reviewed alongside the reserves review recommended in section D, to ensure the investment policy is still consistent with Council objectives.</p>	

