

Internal Audit Report for Coddenham Parish Council for the period ending 31 March 2025

Clerk	Maggie Burt
RFO (if different)	-
Chairperson	Councillor Sarah Gregory
Precept	£34,217.00
Income	£42,677.43
Expenditure	£41,565.58
General reserves	£21,240.93
Earmarked reserves	£20,682.18
Audit type	Annual – non-exempt authority
Auditor name	Victoria Waples

Introduction

The primary objective of internal audit is to review, appraise and report upon the adequacy of internal control systems operating throughout the council. To achieve this SALC adopt a predominantly systems-based approach to audit.

The council's internal control system comprises the whole network of systems established within the council to provide reasonable assurance that the council's objectives will be achieved, with reference to:

- the effectiveness of operations
- the economic and efficient use of resources
- compliance with applicable policies, procedures, laws, and regulations
- the safeguarding of assets and interests from losses of all kinds, including those arising from fraud, irregularity, and corruption

- the integrity and reliability of information, accounts, and data

Methodology

When conducting the audit, the internal auditor may:

- conduct a selective assessment of compliance with relevant procedures and controls expected to be in operation during the financial year in order to be able to complete the Annual Internal Audit Report 2024/25 of the Annual Governance and Accountability Return (AGAR)
- review the reliability and integrity of financial information and the means used to identify, measure, classify and report such information
- review the means of safeguarding assets and, as appropriate, verify the existence of such assets
- appraise the economy and efficiency with which resources are employed, identify opportunities to improve performance and recommend solutions to problems
- review the established systems to ensure compliance with those policies, procedures, laws, and regulations which could have a significant impact on operations, and determine whether the council complies
- review the operations and activities to ascertain whether results are consistent with objectives and whether they are being conducted as planned

Section 1 – proper bookkeeping The internal auditor will look at the methods and processes used to manage the council's accounts and in particular that it provides clear data for reporting and monitoring purposes. This includes checking information is accurate, kept up to date, referenced and verified.		
Evidence		<i>Internal auditor commentary</i>
<i>Is the ledger maintained and up to date?</i>	Yes	Excel spreadsheets were submitted for internal audit review, and it is confirmed that these are well maintained and up to date.
<i>Is the ledger on the correct basis in relation to the gross income/expenditure?</i> (under Proper Practices, Councils are required to work on an Income & Expenditure basis when their gross income, or gross expenditure, exceeds £200,000 for 3 consecutive years)	Yes	Council's gross income and expenditure level is below the threshold of £200,000 and has been for three (3) continuous years. Council's operating under this limit may choose either to report on an income and expenditure basis or on a receipts and payments (R&P) basis. Council has elected to report its financial matters on a receipts and payments basis.
<i>Is the cash book up to date and regularly verified?</i>	Yes	The cashbook is reconciled on a regular basis. Council follows proper practices in ensuring that its accounting procedure gives an accurate presentation of an authority's true financial position by focusing on the balance of economic benefits that it has under its control, rather than just its bank balance and the Responsible Financial Officer (RFO) has ensured that there are clear financial management reports submitted to the council on a regular basis.
<i>Is the arithmetic correct?</i>	Yes	A number of spot checks were conducted, and the functionality of the cashbook was found to be in order.
Additional comments:		

Section 2 – Financial Regulation and Standing Orders		
The internal auditor will check the date the Council conducted its annual review of both Standing Orders and Financial Regulations and in particular check if these are based on NALC'S latest model which include legislative changes.		
Evidence		Internal auditor commentary
Have Standing Orders been adopted, up to date and reviewed annually?	Yes	Council's Standing Orders, were reviewed at the meeting of 13 th July 2023 and are based on the latest model published by the National Association of Local Councils (2022). <i>Comment: at the next annual review, Council might wish to note that NALC have updated Model Standing Order (England) section 18 to comply with new procurement legislation and ensure consistency with our Model Financial Regulations. The changes are to 18.a.v, 18.c, 18.d, and 18.f. NALC have also updated Model Standing Order (England) section 14 to better reflect Code of Conduct requirements. 14.a, 14.b, and 14.c have been removed. NALC have also changed the language in the document to gender-neutral terms to align with their policy and the Civility and Respect Project.</i>
Are Financial Regulations up to date and reviewed annually?	No	Financial Regulations, as seen on the Council's website were reviewed at the same meeting and are based on the NALC Model Financial Regulations 2018 and contain out of date provisions relating to procurement. Recommendation: council should note that revisions to the Model Financial Regulations were published on 13th March 2025, and these should be reviewed and adopted to the council for adoption at the earliest opportunity.
Has the Council properly tailored the Financial Regulations?	Yes	The Council's Financial Regulations have been tailored to the Parish Council.
Has the Council appointed a Responsible Financial Officer (RFO)? ¹	Yes	In accordance with Section 151 of the Local Government Act 1972(d) (financial administration), the Council has appointed a person (the Clerk) to be responsible for the administration of the financial affairs of the relevant authority. Council's Financial Regulation 1.5 confirms that the Clerk is so appointed.

¹ Section 151 Local Government Act 1972 (d)

Section 3 – Payment controls

The internal auditor will specifically check bank reconciliation including credit/debit cards and management approval processes and evidence that internal Financial Regulations (FO) are being followed. The internal auditor will examine how regular payments are managed and specifically seek evidence that these have been brought back to the Council for verification purposes especially where the actual payment made differs from the amount previously agreed. VAT should be clearly identified including evidence that claims have been correctly managed. The internal auditor will check if the Council has a clear understanding on eligibility in relation to the General Power of Competence and that s.137 has been correctly applied and managed.

Evidence		Internal auditor commentary
Is there supporting paperwork for payments with appropriate authorisation?	Yes	A selection of random payments were cross checked against minutes, cash book, bank statement and invoices and all were found to be recorded/ authorised in accordance with Proper Practices. Council follows the authorisation procedures as set up under its adopted financial regulations as well as the internal controls that have been put in place to safeguard public finances. Financial Regulation 7.6 states that “Two councillors who are authorised signatories shall check the payment details against the invoices before approving each payment using the online banking system” <i>Comment: it is advised that council ensures that there is clear evidence as to those who have made the internet payments. Evidence would be expected to be via signature on the invoice to be paid thereby providing verification that the authorised signature has carried out a cross check prior to releasing the funds at the bank.</i>
Where applicable, are internet banking transactions properly recorded and approved?	Yes	Internet banking is operated in accordance with the Council's own Financial Regulations and is used for the settlement of the council's expenditure. The council's risk assessment documentation and internal control statement detail the procedure to be followed for the making of electronic payments in accordance with council's own Financial Regulations. Council operates with a complex mandate which follows a dual authorization process.
Is VAT correctly identified, recorded, and claimed within time limits?	Yes	VAT is identified in the cash book. The VAT claim for the period 1 st April 2024 to 31 st January 2025 in the sum of £461.85 was submitted in February 2025. The VAT claim for the year ending 31 st March 2024 in the sum of £2,365.48 was settled in April 2024.

Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ²	N/A	The council has not confirmed that it is eligible to exercise the GPOC.
Are payments under s.137 ³ separately recorded, minuted and is there evidence of direct benefit to electorate?	Yes	Payments identified as being made under this power for the year under review totalled £150 and were separately recorded and of a direct benefit of the electorate. Following a review of the payments made, and understanding that s137 is a power of “last resort” the following should be noted: for expenditure incurred in providing assistance for the Citizens Advice Bureau the power to be used should be LGA 1972 s142 <i>Comment: council is reminded that s137 is a capped power and payments should be within statutory limits and deemed to be of benefit to those living in the area.</i>
Where applicable, are payments of interest and principal sums in respect of loans paid in accordance with agreements?	Yes	The council has the following Public Works Board Loans: 1. PW487910. Interest repayments are to be made twice yearly on the nearest working day to 24 th June and 24 th December. Balance outstanding as at 31 st March 2025 was seen and verified as £32,229.22. 2. PW6496630. Interest repayments are to be made twice yearly on the nearest working day to 24 th June and 24 th December. Balance outstanding as at 31 st March 2025 was £16,045.37. Half yearly payments of £6,575.92 were made on 24 th June and 24 th December 2024.
Additional comments:		

² Localism Act

³ Section 137 of the Local Government Act 1972 (“the 1972 Act”) enables local councils to spend a limited amount of money for purposes for which they have no other specific statutory expenditure. The basic power is for a local council to spend money (subject to the statutory limit – of £10.81 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

Section 4 – Risk management		
The internal auditor will expect to find evidence of the management of risks from identification of what those are for each individual Council through to how these will be managed and the controls in place to mitigate these and that these have been approved by the Council.		
Evidence		Internal auditor commentary
<i>Is there evidence of risk assessment documentation?</i>	Yes	The risk assessment documentation as reviewed provides details of the risks associated with the functioning of a smaller authority and the measures that the Council will undertake to mitigate such risks. The Risk Register for the year under review was considered and adopted by the council at its meeting of 6 th March 2025.
<i>Is there evidence that risks are being identified and managed?</i>	Yes	Council is aware that risk assessment needs to focus on the safety of the parish council's assets and in particular its money. There is evidence that overall the parish council has taken action to identify and assess those risks and has considered what actions or decisions it needs to take during the year to manage in order to avoid financial or reputational consequences. <i>Comment: council has in place monitoring documents which identify the risks involved with and the potential for improvements to its arrangements to protect public money. It provides the opportunity for reviews of operational as well as financial and governance reviews by members to ensure that it has mitigation measures in place to address the risks associated with the council's day to day operations.</i>
<i>Does the Council have appropriate and adequate insurance cover in place for employment, public liability and fidelity guarantee and has been reviewed on an annual basis?</i>	Yes	Council has insurance in place its main insurance under a Select for Local Councils Policy with Zurich Insurance. Core cover for the council's insurance policy is shown as: Public & Products Liability: £12million; Employer's Liability: £10million and Fidelity Guarantee of £250thousand. <i>Comment: Council has followed recommended guidance by ensuring that its Fidelity Cover is equal to at least the sum of the year-end balances plus 50% of the precept/grants to be received in the following April/May and/or during the year upon receipt of grants.</i> During the year under review, council is able to demonstrate, as evidenced from a review of the minutes, that it is aware that it is the responsibility of the Council as a whole to satisfy itself that insurances are adequate and that all steps have been taken to mitigate and manage identified risks with

		appropriate insurance and that annual reviews of the Council's insurance were undertaken prior to renewal. Confirmation was given at the meeting in September 2024, that the insurance would be renewed with the current provider. <i>Comment: Council has ensured that it is able to demonstrate that it has reviewed the risks facing the Council in transacting its business and has taken out appropriate insurance to manage and reduce the risks relating to property, cash and legal liability (amongst other things).</i>
<i>Evidence that internal controls are documented and regularly reviewed⁴</i>	Yes	During the year, through a number of tests, the council reviewed its internal controls and considered their effectiveness. At the meeting of 11th November 2024, the councillor appointed to conduct the review of the internal controls, presented their findings to full council. The report was accepted by the council with amendments relating to the formal review of council appointed contractors. As such, it is evidenced from the document seen, that the council, in accordance with Regulation 6 of the Accounts and Audit Regulations 2015, confirmed that the financial and management systems of the council were sound and adequate and internal control arrangements were efficient and effective to address the risks associated with the management of public finances. <i>Comment: Council continues with the good practice of appointing a councillor(s) to review the system of internal control via specific tests and to submit such reports to full council thereby demonstrating that it has understood the requirements to have in place safe and efficient arrangements to safeguard public money.</i>
<i>Evidence that a review of the effectiveness of internal audit was conducted during the year, including consideration of the independence and competence of the internal auditor prior to their appointment⁵</i>	Yes	Council formally reviewed the scope and effectiveness of its internal audit arrangements at the meeting at which the internal auditor was appointed. <i>Comment: Council is aware that in accordance with the Accounts and Audit Regulation 2015, the parish council must review the terms of reference and effectiveness of internal audit and demonstrate that it has understood that the role of internal audit is to evaluate and report on the adequacy of the system of internal control.</i>

⁴ Accounts and Audit Regulations

⁵ Practitioners Guide

Section 5 – Budgetary controls		
The internal auditor will seek verification that budgets are properly prepared, agreed and monitored. In particular they will look for evidence of good practice in that the key stages of the budgetary process have been followed		
Evidence		Internal auditor commentary
Verify that budget has been properly prepared and agreed	Yes	The budget for the year 2024 - 2025 was approved at the Council meeting of 3rd January 2024 with evidence given that the revenue budget would be set at £36,717 to be funded by the precept and reserves. The revenue budget for the year 2025 - 2026 was approved at the council meeting of 8th January 2025. <i>Comment: council should consider including within the body of the minutes the actual budget being set alongside the reasoning for such a budget thereby ensuring transparency in the budgetary process followed by the council.</i>
Verify that the precept amount has been agreed in full Council and clearly minuted	Yes	The minutes of 3rd January 2024 confirm that the precept to be levied for the year 2024 – 2025 would be set at £34,217. The precept for the year 2025 – 2026 was discussed and approved at the meeting of 8th January 2025 and set at £35,259. Recommendation: in accordance with best practice, council should record, in the minutes, the impact the precept being set would have on a Band D Dwelling in monetary as well as percentage terms.
Regular reporting of expenditure and variances from budget	Yes	The minutes evidence that council conducted reviews covering the budget for the current year with a review of income and expenditure against budget at each meeting. A monitoring statement is produced which includes a breakdown of all receipts and payments balance with variances against budgets and details of virements as approved by the council to balance the budget set. <i>Comment: Council in accordance with its own standing order 17c produces regular statements showing evidence of comparisons between budgeted and actual income and expenditure to form the basis of approval for virements in accordance with Council's own Standing Orders.</i>

Reserves held – general and earmarked ⁶	Yes	The Council, as at year-end, had overall reserves totalling £41,923.21 of which £21,240.93 were general and £20,682.28 were earmarked reserves (which includes the restricted reserve (CIL)). <i>Comment: Council has followed guidance as issued by Proper Practices which states that it is regarded as acceptable for a council's general (non-earmarked revenue) reserves to be equal to 3 to 12 months of Net Revenue Expenditure and should ensure that the level of general reserves held is in accordance with an adopted General Reserve Policy. There is no upper limit for Earmarked Reserves, but they should be held for genuine and intended purposes and their level subject to regular review and justification (at least annually).</i> Council's adopted Reserve Policy provides clarity on the reasoning behind the holding of reserves and the allocation of its reserves held regarding the setting of the budget for the next financial year. The adopted policy shows an intended level of General Reserves to be maintained to ensure that the council achieves the recommended levels. The policy confirms that even at times when extreme pressure is put on the council's finances the council will maintain a general reserves of not less than 50% and more than 80% of its precept.
Additional comments: Council has shown good practice by ensuring the recommended key stages as to the budgetary process are followed for the year and has ensured that progress against the budget is reviewed regularly throughout the year.		

⁶ In accordance with proper practices, the generally accepted minimum level of a Smaller Authority's General Reserve is that this should be maintained at between three (3) and twelve (12) months of Net Revenue Expenditure

Section 6 – income controls		
The internal auditor will seek evidence to ensure income is correct managed – recorded, banked, and reported and test mechanisms used to achieve this.		
Evidence		Internal auditor commentary
<i>Is income properly recorded and promptly banked?</i>	Yes	Income is recorded in accordance with Council's Financial Regulations. A sample of receipts was checked against cash book and bank statement and found to be in order and recorded in accordance with Proper Practices. The RFO has ensured that the accounting records contain all day-to-day entries of all sums of money received.
<i>Is income reported to full council?</i>	Yes	Income received is reported to full Council within the financial reports submitted to full Council in accordance with council's financial regulations.
<i>Does the precept recorded agree to the Council Tax Authority's notification?</i>	Yes	Council received precept in the sum of £34,217.00 from Mid Suffolk District Council for the period under review as reported to full Council within its Financial Reports at its meetings in May and November 2024.
<i>If appropriate, are CIL reporting schedules in accordance with the Regulations?⁷</i>	Yes	The CIL schedules show contain a detailed breakdown of receipts and expenditure for the year under review.
<i>Is CIL income reported to the council?</i>	Yes	During the year under review, council receive CIL receipts in the sum of £2,130.27.
<i>Does unspent CIL income form part of earmarked reserves?</i>	Yes	The CIL report for 2024 - 2025 shows that there is a nil carry forward balance at the year ending 31 st March 2025 of £5,221.09.
<i>Has an annual report been produced?</i>	Yes	The annual report was submitted in draft form for internal audit review and is still to be presented to and approved by full council.
<i>Has it been published on the authority's website?</i>	Yes	The report has not yet been uploaded to the council's website.
Additional comments:		

⁷ Community Infrastructure Levy Regulations 2010

Section 7 – petty cash		
The Internal Auditor will seek evidence that the Council has followed its own policies, procedures, and verification processes and that these are up to date.		
Evidence		Internal auditor commentary
<i>Is petty cash in operation?</i>	<i>N/A</i>	Council does not operate a petty cash system.
<i>If appropriate, is there an adequate control system in place?</i>	<i>N/A</i>	
Additional comments:		

Section 8 – Payroll controls		
The Internal Auditor will check salaries were approved in accordance with PAYE, NI, Pension and that there is a clear understanding that the clerk is not self-employed. The Internal Auditor will also review how payroll is managed including evidence of approval of payslips.		
Evidence		Internal auditor commentary
<i>Do all employees have contracts of employment?</i>	Yes	Council had 1 employee on its payroll at the period end of 31 st March 2025. Employment contracts were not reviewed during the internal audit but the Clerk to the Council has confirmed that a contract of employment in place.
<i>Has the Council approved salary paid?</i>	Yes	All salary payments are presented to full Council for approval and payment is made via internet banking in accordance with council's own Financial Regulations. <i>Comment: Council ensures that there are suitable payroll arrangements in place which ensures the accuracy and legitimacy of payments of salaries and wages, and associated liabilities and as such the council has complied with its duties under legislation.</i>
<i>Minimum wage paid?</i>	No	No employee is paid the minimum wage.
<i>Are arrangements in place for authorising of the payroll and payments to the council? Does this include a verification process for agreeing rates of pay to be applied?</i>	Yes	There are suitable payroll arrangements in place which ensures the accuracy and legitimacy of payments of salaries and wages, and associated liabilities and as such the council has complied with its duties under legislation.
<i>Do salary payments include deductions for PAYE/NIC? Is PAYE/NIC paid promptly to HMRC?</i>	Yes	The payroll function for the year under review is operated in accordance with HM Revenue and Customs guidelines. Cross-checks were completed on a sample of payments covering salary and all were found to be in order. Deductions due to be paid to HM Revenue and Customs during the year under review were made within the requisite time periods.
<i>Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation?⁸</i>	Yes	Council is aware of its pension responsibilities and the member of staff is not enrolled into a pension scheme provided by the employer.
<i>Have pension re-declaration duties been carried out</i>	Yes	From paperwork seen, the council completed its re-declaration of compliance with The Pensions Regulator in November 2022

⁸ The Pension Regulator – [website click here](#)

<i>Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?</i>	Yes	There is a satisfactory expense system in place and all expenses claimed are approved by full council with supporting paperwork in place and reimbursed in accordance with Council's Financial Regulations.
<i>Additional comments:</i>		

Section 9 – Asset control		
The Internal Audit will be seeking to establish if there is a list of assets in accordance with proper practices including the date of acquisition, location, and value. This extends to checking policies (with evidence of review) and that the Council has applied the documented approach in practice. The Internal Auditor will check not only valuation processes but the existence of reserve budgets for depreciation and adequacy of insurance. A clear audit trail should be available when items are purchased including minutes to evidence approval.		
Evidence		Internal auditor commentary
<i>Does the Council maintain a register of material assets it owns and manage this in accordance with proper practices?⁹</i>	Yes	The Asset Register, as submitted for internal audit review, reflects those items listed under insurance and within the parish council's remit for maintenance and ownership. It is noted that the declared value for all assets at year-end (31.03.2025) is £19,938.99 which reflects movement during the year following the disposals of recorded assets. For comparison, the declared value on the asset register as at 31.03.24 was £20,073.67.
<i>Is the value of the assets included? (Note value for insurance purposes may differ)</i>	Yes	Council is mindful of the guidance within the Governance and Accountability for Smaller Authorities in England March 2024 on the valuation of its assets and has ensured that where the acquisition value of the asset at the time of first recording is used, that method of valuation has been consistently applied.
<i>Are records of deeds, articles, land registry title number available?</i>	N/A	Records of deeds, articles, land registry title number were not reviewed during the internal audit which was conducted via remote means.
<i>Are copies of licences or leases available for assets sited at third party property?</i>	N/A	Council has not declared that it has any assets located on third party property.
<i>Is the asset register up to date and reviewed annually?</i>	Yes	The asset register seen was approved by council at its meeting of 2 nd February 2025 and the values seen on the Asset Register - £19,939 match those on the Draft Accounting Statements.
<i>Cross checking of insurance cover</i>	Yes	Council has appropriate insurance under all risks cover for its assets as specified under the headings on the insurance schedule.
Additional comments:		

⁹ Practitioners Guide

Section 10 – bank reconciliation		
The internal auditor will seek to establish that the Council understands and can evidence good practice and internal control mechanisms in relation to bank reconciliation.		
Evidence		Internal auditor commentary
<i>Is bank reconciliation regularly completed and reconciled with the cash book and cover every account?</i>	Yes	Bank reconciliations are completed on a regular basis and reconcile with the cash sheets. Overall there is regular reporting of bank balances within the detailed financial reports submitted to full council. <i>Comment: council has understood that the bank reconciliation is a key tool for management as it assists with the regular monitoring of cash flows which aids decision-making, particularly when there are competing priorities.</i>
<i>Do bank balances agree with bank statements?</i>	Yes	Bank balances as of 31 st March 2025 agree with the year-end bank statements and at year end stood at £41,923.21 across the accounts held in the parish council's name. <i>Comment: the internal auditor is able to verify the year-end bank reconciliation detail and can ensure that the combined cash and bank balances as identified are included within the AGAR, section 2, line 8.</i>
<i>Is there regular reporting of bank balances at Council meetings?</i>	Yes	Balances across the Council's accounts are reported at each meeting of the council. The minutes of council meetings, demonstrate that an internal review and verification of the bank reconciliation versus the bank statements has been undertaken. <i>Comment: this is not only good practice but is also a safeguard for the RFO and fulfils one of the authority's internal control objectives.</i>
<i>Additional comments:</i>		

Section 11 – year end procedures		
Evidence		Internal auditor commentary
Are appropriate accounting procedures used?	Yes	Accounts are produced on a receipts and payments basis, and all found to be in order.
Financial trail from records to presented accounts	Yes	The end of year accounts were presented for the internal auditor review and confirmation is given that there is a clear financial trail from records to presented accounts.
Has the appropriate end of year AGAR ¹⁰ documents been completed?	Yes	As Council is a smaller authority with gross income and expenditure exceeding £25,000 it will be required to complete the Annual Governance and Accountability Return (AGAR) Form 3. The Accounting Statements were submitted in draft form for the internal audit review, and it is assumed that the figures submitted will be those that are replicated in their entirety onto the AGAR.
Did the Council meet the exemption criteria and correctly declared itself exempt?	N/A	As the Parish Council had gross income and expenditure exceeding £25,000 during 2023-2024, it was not able to declare itself exempt from a limited assurance review for the year ending 31 st March 2024.
During the period in question did the small authority demonstrate that it correctly provided for the exercise of public right as required by the Accounts and Audit Regulations 2015?	No	The internal auditor is able to confirm that the notice of the public rights seen on the website had the dates of 4th July to 14th August 2024 with the form dated 3rd July 2024. <i>Comment: Within the Annual Internal Audit Report, internal control objective test M requires the internal auditor to establish whether the parish council correctly provided for the exercise and published a copy of the required “Public Notice” by ensuring that it clearly identified the statutory 30 working day period when the Authority’s records are available for public inspection.</i> Council is advised that the latest possible dates that complied with the statutory requirements were Monday 1st July until Friday 9th August 2024. The period starts with the day on which the period for the exercise of public rights is treated as having been commenced which is the day following the day on which all of the obligations as prescribed in legislation have been

¹⁰ Annual Governance & Accountability Return (AGAR)

		fulfilled. If council approved the account son 1st July, it will be unable to include the first 10 working days of July in its calculations for the period of the exercise of public rights. Recommendation: council is advised to consider the response from the External Auditor (see Section 13) and answer in the negative to Assertion 4 on the Annual Governance Statement for the year ending 31st March 2025.
Have the publication requirements been met in accordance with the Regulations? ¹¹	No	The Council has only partially complied with the requirements of the Accounts and Audit Regulations 2015 for smaller authorities with income and expenditure exceeding £25,000 for the year ending 31st March 2024 as although it has published the following on a public website: • Notice of the period for the exercise of public rights • Annual Internal Audit Report • Notice of conclusion of audit • Section 3 – External Auditor’s Report and Certificate of the AGAR • Sections 1 and 2 of the AGAR (audited) including any amendments as a result of the limited assurance review the unaudited AGAR was not published within the statutory period (by 1st July) and as such council will need to review its responses to the Annual Governance Statement for the year ending 31st March 2025.
Additional comments:		

¹¹ Accounts and Audit Regulations 2015

Section 12 – internal audit		
The internal auditor will revisit weaknesses and recommendations previously identified to see if these have been addressed. They will also check if any changes introduced require further verification to ensure effectiveness of the corrective action taken.		
Evidence		Internal auditor commentary
Has the Council considered the previous internal audit report?	Yes	The Internal Audit Report for the period ending 31 st March 2024 was formally considered by and approved for adoption at the meeting of full Council of 2 nd September 2024.
Has appropriate action been taken regarding the recommendations raised?	Yes	At the meeting of 2 nd September 2024, council undertook a formal review of the report and considered proposed actions from the Clerk arising from the recommendations and comments from the Internal Audit Report. The recommendation raised within the internal audit report for the year ending 31 st March 2024 was as follows: 1. Review of the timing of the signing of the AGAR to ensure that this is not contrary to proper practises.
Has the Council confirmed the appointment of an internal auditor?	Yes	The appointment of the person to act as the parish council's independent internal auditor for the year 2024 – 2025 was approved at the council meeting of 2 nd September 2024. <i>Comment: Council has understood the requirement to ensure that there is an appointed person to provide assurance that the financial and management systems of the council are sound and adequate and internal control arrangements are efficient and effective.</i>
Has the letter of engagement been approved by full council?		The letter of engagement was approved at the meeting of 6 th March 2025. <i>Comment: by approving the letter of engagement, Council will be following Proper Practices by ensuring it has clarity on the provision of internal audit including the roles and responsibilities, audit planning and timing of visits, reporting requirements, rights to access to information, members and officers, period of engagement and remuneration.</i>
Additional comments:		

Section 13 – external audit for the period under review		
The internal auditor will revisit the external audit so that previous weaknesses and recommendations can be considered.		
Evidence		Internal auditor commentary
Has the Council considered the previous external audit report? ¹²	Yes	The External Audit Report and Certificate for the year ending 31 st March 2024 was submitted to and considered by Full Council with formal adoption at the meeting of 25 th September 2024.
Has appropriate action been taken regarding the comments raised?	Yes	The report from the external auditors details a certification which was completed with no exceptions. The following matters were brought to the attention of the council “We note that the smaller authority did not comply with Regulation 15 of the Accounts and Audit Regulations 2015 as it failed to make proper provision during the year 2024/25 for the exercise of public rights, since the period for the exercise of public rights did not include the first 10 working days of July. As a result, the smaller authority must answer ‘No’ to Assertion 4 of the Annual Governance Statement for 2024/25 and ensure that it makes proper provision for the exercise of public rights during 2025/26”. The Internal Auditor is able to verify that the external auditor report and certificate along with the conclusion of the external audit have been published on the Council’s website. Details as to how copies may be purchased have also been included. <i>Comment: Council has noted Regulation 20 (in part) which states that the annual audit letter received from the auditor must be considered by the authority and published (including publication on the authority’s website) and to permit copies to be purchased.</i>
Additional comments:		

¹² Regulation 20 Accounts and Audit Regulations 2015 – following completion of an audit the Council should note that it is the Council as a whole (i.e., All members) and not a committee that should receive and consider the audit letter (including Annual Return and Certificate) from the local auditor as soon as reasonably practicable and the minutes should reflect that these have been received.

Section 14 – additional information		
The internal auditor will look for additional evidence of good record keeping, compliance with data protection regulations, freedom of information and website accessibility regulations.		
Evidence		Internal auditor commentary
Was the annual meeting held in accordance with legislation? ¹³	Yes	Council held its Annual Meeting of the Parish Council at which the Chair was elected on 8 th May 2024 in accordance with legislation in place at that time.
Is there evidence that Minutes are administered in accordance with legislation? ¹⁴	Yes	Council is aware that under LGA 1972 schedule 12, paragraphs 41(1) and 44, the draft minutes of a meeting should be formally approved (with any necessary amendments) at the next meeting. At each meeting, the Chair is given formal approval to sign the minutes.
Is there a list of members' interests held?	Yes	A copy of the members' interests for all of the serving councillors was seen on the district council's website with a direct link from that of the parish council's.
Does the Council have any Trustee responsibilities and if so, are these clearly identified in a Trust Document?	N/A	Council has no declared trustee responsibility.
Has the Transparency Code been correctly applied, and information published in accordance with current legislation?	Yes	Council is aware that councils with gross income and expenditure under £25,000 are required to follow the Local Government Transparency Code 2014 for smaller authorities. For those authorities that fall between the Transparency Code 2014 and the Transparency Code 2015 (gross income and expenditure exceeding £200,000), guidance is given that councils should strive to follow the provisions of the 2015 code. <i>Comment: council, by publishing certain datasets on its website in accordance with the required timescales, is working towards compliancy of the 2015 code.</i> <i>Information to be published quarterly: Individual items of expenditure that exceed £500; Government Procurement Card transactions; Invitations to tender for contracts over £5,000; Details of contracts that exceed £5,000.</i>

¹³ The Local Government Act 1972 Schedule 12, paragraph 7 (2) and Schedule 15 (2)

¹⁴ Public Bodies (Admission to Meetings) Act 1960, Local Government Act 1972, and the Localism Act 2011

		<i>Information to be published annually: Details of all land and building assets; Grants to Voluntary, Community and Social Enterprise Organisations; Organisational Chart.</i>
<i>Has the Council registered with the Information Commissioner's Office (ICO)?¹⁵</i>	Yes	The Council is correctly registered with the Information Commissioner's Office (ICO) as a Data Controller in accordance with the Data Protection Legislation. As defined under the Freedom of Information Act 2000, council should be aware that it needs to adopt and publish a Publication Scheme, tailored to the council to accurately reflect council's activities undertaken and the manner in which information will be made available. Recommendation: Council should seek to review the information it holds under the scheme and ensure that the scheme is fully tailored to the parish council and available to view on its website. NALC Legal Topic Note 37 provides further clarification.
<i>Is the Council compliant with the General Data Protection Regulation requirements?</i>	Work required	Whilst Council has adopted and published details on its website (Protecting Your Information) on its website which provides an explanation of the lawful basis for processing data, accountability and individual rights, there were no documents available to view on the council's website detailing compliancy with the regulations. Recommendation: Council should consider expanding its suite of policies to cover the framework that the public can expect for the handling of requests from individuals who have the right to know what data is held on them, why the data is being processed and whether it will be given to any third party and to link this into a Data Retention Policy which would detail the periods for which documentation will be held, along with the methods of disposal. Council should also consider further policies detailing the procedures to be followed for dealing with subject access; freedom of information requests and procedures for dealing with data breaches.
<i>Has the Council published a website accessibility statement on their website in line with Regulations?¹⁶</i>	Yes	Council has published a website accessibility statement on the council operated website detailing the technical information of the website along with the methods used for testing the website; the steps being taken to

¹⁵ Data Protection Act 2018

¹⁶ Website Accessibility Regulations 2018

		improve accessibility and how the site is being improved to ensure that content meets the WCAG 2.1 Standard under Regulation 8 of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.
<i>Does the council have official email addresses for correspondence?¹⁷</i>	Yes	Council currently operates with a .org.uk website with the clerk utilising a "clerk.coddenhampc" Gmail address. Recommendation: council should note the new Assertion in the Annual Governance Statement (effective April 2025) which, to warrant a positive response, requires the council to have a generic email account hosted on an authority owned domain. Sections 5.117 to 5.120 provides clarity on the manner in which an authority owned email account satisfies GDPR principles, integrity, confidentiality, accountability and transparency.
<i>Is there evidence that electronic files are backed up?</i>	Yes	Council uses a system whereby a back-up of the council's data is taken and stored appropriately.
<i>Do terms of reference exist for all committees and is there evidence these are regularly reviewed?</i>	Yes	Council does not operate a committee system.
Additional comments:		

Signed: Victoria S Waples

Date of Internal Audit Review: 18/05/2025 & 21/05/2025

Date of Internal Audit Report: 21/05/2025

On behalf of Suffolk Association of Local Councils

¹⁷ Practitioners Guide