# Risk Assessment HIGH 0 MEDIUM 0 LOW 16

# Broadstairs & St Peter's Town Council INTERNAL AUDIT 2023-2024 AUDIT PLAN WITH COMMENTS / FINDINGS

I am pleased to report to Members of the Broadstairs & St Peter's Town Council (the "Council"), that I have completed my year-end internal audit of the Council's records for the twelve month period to 31 March 2024, following my audit visit and subsequent conversations on 24 May 2024.

Councillors should be aware that my work cannot be relied upon to identify the occasional omission or insignificant error, nor do I actively seek evidence of breaches of trust or statute, neglect or fraud, which may have taken place. It is the responsibility of the Councillors of the Council to guard against such events, but if during my audit testing such events are discovered I am duty bound to disclose such events to the Council.

I would like to take this opportunity to thank the Town Clerk, Mrs Kirsty Holroyd for her assistance given to me during my audit visit.

Area	Item	Comments / Findings Interim visit 20 Oct 2023	Comments / Findings Year-end Audit 24 May 2024
Previous Audits	<ul> <li>Date of last External Audit         Certificate or Exemption         Certificate for 2022-23</li> <li>Comments if any</li> <li>Publication on website.</li> <li>Date of last Internal Audit</li> </ul>	Sept 2023. Actual publishing date was 5 Oct 2023. There was one minor matter relating to an "unticked box 11a" relating to "trust funds", which could be inferred from other answers on the AGAR. Last Internal audit visit was 19 May 2023, the Internal	Mazar's Report considered by F&GP Comm on 9 Oct 2023 Min 8 and referred to Council 30 Oct 2023 Min 280, noting the comments.
	<ul> <li>Comments if any</li> <li>Review of any items outstanding from previous internal / external audit reports.</li> </ul>	Audit Report was considered by Council on 16 June 2023 Min 218 and considered in more detailed by F&GP 10 July 2023 Min 108 i) new deposit a/c with Unity Trust ii) Cllrs to informally monitor the website content and advise the Town Clerk of any issues.	Council 11 Dec 2023 Min 325 resolved to note the Interim Report and grant delegated authority to the Town Clerk to move money between the Unity Trust Current Account and an interest bearing Deposit Account.

<u>Minutes</u>	<ul> <li>Scan of the minutes of the Council's meetings and the Finance Committee.</li> <li>General Power of Competence (GPC)?</li> <li>Dispensations</li> <li>S.40 LA&amp;A Act 2014 fillming/recording</li> </ul>		
Code of Conduct/ Acceptance of Office	<ul> <li>Date adopted</li> <li>Any changes in elected/co-opted members since last Audit?</li> <li>DPI's complete</li> <li>DPI's on website or weblink</li> <li>New Governance Compliance</li> <li>NEXT ELECTION</li> </ul>	5 Wards, 4 elections and 1 uncontested. 15 Cllrs elected, only 3 were existing Councillors, split across 3 parties and 1 Independent Councillor  New May 2023 DPI information available on the website  May 2027	No change
Standing Orders and Financial Regulations	<ul> <li>Have they been formally adopted and applied?</li> <li>Have any changes been made since they were adopted or the last audit?</li> <li>Have any changes been formally adopted by the Council?</li> <li>Virtual Meetings / Delegation to Clerk/RFO still in place?</li> <li>Updated re NALC Models SO's 2018 updated April 2022, Fin Regs 2019?</li> <li>Two signature rule still in place?</li> </ul>	Town Clerk items up to £2k, Town Clerk & Chair of the Committee £2k to £10k and Council < £10k  Fin Regs Amendment Council 24 July 2023 Min 232(iii)  Re: Preferred Contractor Policy and Mtce of the List of Contractors	Regulations that had already been discussed by F&GP amending the Contract Finders threshold from £25k to £30inc VAT.  However, the long-awaited new Model Financial Regulations were published in Late

# Risk Management

- Risk Assessments Are they:
  - Carried out regularly?
  - o Adequate?
  - Reported in the minutes?
  - Inspections of play equipt etc if carried out by staff/Cllrs have they been trained. accredited?
  - ANNUAL REVIEW ?
- Insurance cover is it:
  - O Appropriate/Adequate?
  - o LTA in place?
  - Reviewed regularly?
  - o Fidelity Guarantee Cover £ (Balances + ½ Precept)
- Internal controls are thev:
  - o Documented?
  - O Adequate?
  - Reviewed regularly?
  - (SIC)?
- Systems and Procedures are they:
  - Documented? 0
  - Adequate?
  - Followed?
  - Reviewed regularly?

No Town Council owned play areas

Annual Review of Risk - F&GP Comm 10 July 2023 Min 109(i) and Council 24 July 2023 Min 232(iv).

Long-term Agreement (LTA) in place with Zurich Municipal to 1 April 2024. An extension to the cover to include the Fireworks 5 Nov 2022 approved by F&GP 25 April 2022 Min 654

The Fidelity Guarantee cover = £1m

#### Other Brokers to approach for comparative insurance quotes for the next LTA are

James Hallam - Town Council - James Hallam BHIB (currently launching a new website www.clearcouncils.co.uk)

O Statement of Internal Control F&GP Comm 10 July 2023 Min 109(ii) Cllr Levs appointed as Cllr Auditor to periodically check the regular payments.

#### SIC for 2022-23 was considered as part of the AGAR 2022-23 - 26 June 2023

F&GP Comm 12 June 2023 and Council 16 June 2023 & Hospitality Policy Min 210 iii) resolved to adopt the SIC 2022-23.

Council 16 June 2023 Min 219 reviewed and adopted the Media, Public Relations and the Website & Social Media Policies

Council 24 July 2023 Min 242 reviewed and adopted the Transparency Policy and GDPR Data Protection Policy

Council 25 Sept 2023 Min 266 reviewed and adopted the Co-option Policy and Lone Worker Policy

F&GP Comm 15 Jan 2024 Min 136 – Cllrs received a timetable for the review of the Risk Assessments for 2024.

Council 26 Feb 2024 Min 359 reported and completed risk assessments for Council owned properties.

Council 24 Mar 2024 Min 377, renewed the Insurance LTA with Zurich Municipal. Zurich Municipal and Brokers Clear Councils and Gallagher were all invited to tender and considerable information provided. Only Zurich Municipal provided a quote. The new LTA runs from 1 April 2024 to 31 March 2027 including Debt Recovery and Contract Disputes cover.

#### SIC for 2023-24 to be considered as part of the AGAR 2023-24 - 26 June 2024

Council 30 Oct 2023 Min 289 reviewed and adopted the Freedom of Information Policy & Publication Scheme and the Town Council's Gift Council 27 Nov 2023 Min 308 reviewed and adopted the Town Council's Commemorative Plague (Blue Plague) Policy and Document Management and Archiving Policy Council 11 Dec 2023 Min 326 reviewed and adopted the Staff Eye Test Policy and the Pierremont Hall Parking Policy Council 29 Jan 2024 Min 342 reviewed and adopted the Town Council's Fixed Assets and the Asset Evaluation Policy

Council 24 Mar 2024 Min 384 reviewed and adopted Grievance Policy and Disciplinary Policy

Budgetary Controls  Section 137	•	reported and approved by the Council?  Budget/Precept amounts minuted?  Review of All Reserves included as part of the Budget Setting Process?  Is the actual performance against the budgets reported to the Council during the year  Compare with Fin Regs?  Are significant variances explained in sufficient detail?	The Committee receives summary of income & expenditure by Cost Code.  2024-25 Budget F&GP 11 Sept 2023 Min 116 – appointed 3 Cllrs to form a Working Party to create the first draft of the Budget for 2024-25.	& Exp for Qtr 2 and transparency report), Comm resolved to move budgets to allow for clearer and more efficient calculations of running costs & service charges. F&GP 15 Jan 2024 Min 133 (Inc & Exp for 3rd Qtr and a separate 3rd Qtr Transparency Report reviewed)  2024-25 Budget  First Draft of Budget considered by F&GP 9 Oct 2023 Min 125 and Council 30 Oct 2023 Min 284ii) but decision deferred until the Jan 2024 Meeting. Council 11 Dec 2023 Min 323, Cllrs agreed to net Budget Requirement of £816,999. The Precept sum to be determined at the Jan 2024 Meeting when the Tax Base will be known.  Council 29 Jan 2024 Min 340 Budget requirement adjusted up to £817,160 (to be divisible by 9). Tax base for 2024-25 = 9890.59  Band D tax = £82.62 and increase of 9.5% (equiv. to £7.21 increase)
<b>£9.93 FOR 2023-24</b> (£8.82 FOR 2022-23)	•	Is a separate account/analysis kept? Has the cash limit been exceeded? Have the spending powers been properly used and Minuted?	12.5% (the RPI increase Sept 2021 to 2022) to £9.93	rte dhange
Book-keeping	•	Fit for purpose? Up to date? Arithmetically correct? Balanced regularly?  Turnover above £200k pa?		Scribe Accounts information checked against the draft AGAR papers prepared by the Town Clerk for approval by Council.
	•	Income & Expenditure basis of accounting? Record keeping and the arrangements in place to store previous year's accounts etc.	The Council accounts on an Income & Expenditure basis.	

Petty Cash	•	Has the amount of petty cash float	The Finance Officer will be operating the Petty Cash	Petty Cash balance at 31 Mar 2024 =£19.18
			through the Accounting System and has proposed	Incorporated in the year-end bank reconciliation
	•	Are all petty cash entries recorded?	starting on 1 April for the new financial year.	figures.
		Are payments made from petty	The proposal is to replenish the petty cash float by	
	-	cash fully supported by receipts /	cash withdrawals via the Unity Multipay card.	
			Only one imprest of £50 to date.	
		Are petty cash reimbursements	, ,	
		signed for?		
		Date of last petty cash		
	ľ	reimbursement?		
			Main staffing includes -	
	•	is petty cash balance		Victoria Gardens – taken over by the Town
		independently checked regularly	Senior Administrator (30 hrs pw) Re-titled Deputy Town	
				to manage the gardens and flower beds, one
Payroll				works 10hrs pw, the other 30 hrs pw
			Jan 2023)	
	•	Who is on the payroll and are	Events & Booking Manager (37 hrs pw – Shanade Ma	
		contracts of employment in	appointed to cover maternity leave Leanne Hadden	
		piace?		Events & Bookings Supervisor (P/T) Mia Tillet
	•	who is the RFO?	New position to support the Events Team	- started Jan 2024
	•	Annual Appraisal in place?	particularly weddings and commercial bookings	
	•	Have there been any changes to	(20 hrs pw – for a 12 month period initially) –	
		the establishment during the year?	Council 25 Sept 2023 Min 271	Local Council Consultancy Report
	•	Have there been any changes to	Facilities Officer (37 hrs pw) (David Bassett made	recommendations accepted by Council 24 March
		individual contracts during the	permanent and title change to Facilities Manager	2024 Min 385
		year?	Council 26 Sept 2022 Min 69ii)	
	•	Members Allowances in place	Operations Officer (37 hrs pw)	
		and paid via payroll system?	Civic & Support Officer (37 hrs pw)	
	•	Have new appointments and	Caretaker (10 hrs pw)	
		changes to contracts been	Cllr Roberts appointed "Staff Liaison Cllr" –	Re-appointed for 2024-25
			Council 24 July 2023 Min 241 (ii)	
	•		Cllrs Allowances £600 approved for for 2022-23 – <b>Post</b>	
			Audit Note: Council 30 Oct 2023 Min 288 agreed	payment of the National Pay Offer to be back-
				dated to 1 April 2023. Paid to staff in December
	•			2023
				Staffing Committee received notification of the
		for?	latest pay offer 27 Nov 2023.	new NALC & SLCC endorsed new model
	•	Payroll outsourced?		contract of employment. Council 26 Feb 2024
		•		Min 363 noted the recommendation for staff to be
	•			offered the LGPS in line with District and County
			employees	Officers

#### **Payments**

- Are all payments recorded and supported by appropriate documentation?
- Are payments minuted?
- Review of DD's and SO's ?
- STAFF costs definition for inclusion in Box 4 for 2023-24, check parity for 2022-23?
   Currently includes salary, tax, NIC & Pension (employee & ers) + taxable benefits (home working allowance, broadband & phone allowance etc NOT incl.
- Has VAT been identified, recorded and reclaimed?
- Have internal control procedures been adhered to?
- Contracts:
  - o What contracts exist?
  - Compliance with SO's
  - Have any new contracts or contract variations/extensions been awarded in the year?
  - Procedures adopted for letting of contracts
  - Have contract payments been made in accordance with the contract document?

Payments authorised between Meetings are well minuted eg Council 24 July 2023 Min 235 i) also Receipts Min ii), Min iii) referred to works & services authorised in between meetings. All payments are in the "additional documents" attached to the Agenda as listed on the website under the Meeting they were approved.

The Quarterly Transparency Reports lists the payments made of £500 and above, which are also posted to the website.

Direct Debits and regular payments considered by Council 15 May 2023 Min 197 iv)

NIC & Pension (employee & ers) Staff costs included in Box 4 compliant with the + taxable benefits ( home definition.

VAT balance at the year-end 31 March 2023 = £31,226 (for period covering 20 March 2020 to 31 March 2023), to offset a large VAT bill expected Pierremont Hall and Retort House - VAT to be charged from 1 April 2023. Council 13 Feb 2023 Min liability and calculation back to 2003 = £300.616, which needed to be paid asa

Post Audit Note: Council 30 Oct 2023 Min 284 received an update regarding the VAT bill.

Monthly VAT claims from 1 April 2023 –

April - £2,895, May - £3,465 , June - £3,831 July - £713, August – (£892) paid

## Sample contracts/agreements in place:

Westgate Security – CCTV Mtce.and various alarm installations

Total Cleaning Services – Pierremont Hall Cleaning Box Green Landscapes – Garden Mtce Pierremont Hall (3 years from 1 April 2022)

John Couzens – roof & gutter inspections Pierremont Hall

Marc One Security – Beach Patrols

Venture Telecom – phones & wifi facilities to take payments for bookings

Henderson Setterfield – Property Managers for Pierremont Hall and Retort House

Boys & Maughan – legal services Business Waste – waste disposal

PSTax – VAT advice

HMRC added to the regular payments list – Council 29 Jan 2024 Min 339viii)

Council 30 Oct 2023 Min 284 – PS Tax
Consultants gave a presentation on the VAT
liability and calculation back to 2003 =
£300,616, which needed to be paid asap.
Resolved to adjust the Council's Reserves to
provide funds to pay the VAT liability.
Consideration to be given to restoring some
of these reserves from the Budget 2024-25.
Monthly VAT claims refunds and (payments) –
Sept – (£17,443) paid, Oct (£2,417) paid, Nov
£8,591, Dec £4,277, Jan 2024 £375, Feb £1,744,
Mar £1,374

## Sample contracts/agreements in place:

Kent County Supplies – 5-year lease of the Office photocopier

TMD Building Consultancy Ltd – engaged to oversee the Pierremont Hall Basement (Phase 3) Refurbishment Project including the hiring of specialist services/contractors.

Ability Sash – sash window works

Brachers LLP – legal support to the Basement Project

Blackmore Building Consultancy – dilapidations and lease extension survey for Retort House

	VAT to be charged for taxable supplies from 1 April	Other income in 2023-24 totalled £221,500 compared to £163,680 the previous year. The
<ul> <li>Are all receipts promptly banked?</li> </ul>		main income sources are -
• 1		Pierremont Hall £87,800
' '		Pierremont events £29,000 Retort House - £44,790
		10001110000 244,700
<ul> <li>Are invoicing arrangements adequate?</li> </ul>	for validating the Service Charges BUT the payments from Tenants to be made directly to the Council	
	<ul> <li>Are all receipts promptly banked?</li> <li>Precept, CTSG and Sect 136 payments</li> <li>Are income records inc allotments, hirings adequate?</li> </ul>	<ul> <li>Are all receipts promptly banked?</li> <li>Precept, CTSG and Sect 136 payments</li> <li>Are income records inc allotments, hirings adequate?</li> <li>Are invoicing arrangements</li> <li>2023 Council 13 Feb 2023 Min 145</li> <li>Council 24 July 2023 Min 245 – Tenants invoicing for rent, parking and electricity etc to be brought in-house from 1st August 2023</li> <li>Henderson Setterfield to continue their responsibility for validating the Service Charges BUT the payments</li> </ul>

exist?  Investment recommend balances are FSCS aware  Are bank recommend out for the carried out for the c	Strategy led where bank e in excess of £100k. ? conciliations regularly or each account? ances to Precept ratio lue counterfoils, oks and bank adequately referenced?  NatWest Business Res NatWest Current (130 Unity Trust Instant Accountity Total cash balance  Council 17 April 2023 Instant Accountity Total Cash balance  Council 24 July 2023 Instant Accountity Trust Instant Accountity Total Cash balance  Council 24 July 2023 Instant Accountity Trust Instant Accountity	serve (6508) - £344,508 1) - £25,000 349) - £557,416 cess (5155) - £250,320 ver a/c - £304,002	Bank account balances as at 31 March 2024 - AutWest Business Reserve (6508)       - £234,465         NatWest Current (1301)       - £25,000         Unity Trust Current (0349)       - £371,072         Unity Trust Instant Access (5155)       - £255,335         Vationwide Instant Saver a/c       - £304,002         Petty Cash       - £119         Fotal cash balance       - £1.189.893         Unpresented payments = (£24,776)         Unpresented receipts = £10,156         Council 22 April 2024 Min 400 – Investment
<ul><li>When was the banking arra</li><li>Internet Bar</li></ul>	recommendation to sw Instant Access a/c. To maximise the inte recommend that dele Town Clerk/RFO to m without compromisin activity, ie using the above at least anothe to the Instant Access the time of my visit w	vitch £250k into a Unity Trust  rest potential I would egated powers be given to the nanage the two Unity Trust a/cs	Strategy reviewed and adopted for 2024-25 — ecommended to move £250k from Unity c/a to Nationwide Instant Access to earn a higher nterest rate. NB Precept payment received in April temporarily boosting the above bank valances.
required?)	view (Two signatures view (Two signatures  Council 15 May 2023  Cllrs K Bright, M Gar  Cllr J Bayford to con  others are in place an  Nationwide – Cllrs K  NatWest to review	nd will step down. Bright, M Garner & J Hobson	Cllr Bayford removed from the signatory list.
Any PWLB to	pans? PWLB Loan balance a	,	PWLB Loan balance as at 31 March 2024 - 317,542

Assets and Asset Register (AR)	•	by the Council recorded in an AR? Is the AR up to date? Basis of Asset Values? Are investments recorded?  Are the valuations regularly reviewed? Does the AR show the insurance values? Digital Photographic evidence?  Is there a separate Inventory List of	£13,175 to £631,145  Valuation Report received by Council on 17 April 2023 Min 175. Town Clerk was asked to seek a second opinion on the value of the civic regalia and the superfluous external lights be sold at auction.  New assets in 2023-24 to date include 2 picnic tables, 2 laptops and desks. The biggest item was the purchase of a second-hand van for the Facilities Team - £11,000.  Council 16 June 2023 Min 212, that former Cllrs be offered their "iPad devices" for £50, any unclaimed be given to charity. Only 2 were purchased the rest to be	Net increase in Asset Values as at 31 March 2024 - £15,530 to £646,675  Electric van – up to £24k as per Council 11 Dec 2023 Min 322 Citroen Van LX73YFG
Year-end procedures Inc. AGAR		insurance excess levels)?	passed onto suitable charity etc. Year-end procedures to be checked at final audit	Draft AGAR 2023-24 figures for the Statement of Accounts were audited and compared to the Scribe reports provided.
		<ul> <li>Date of approval of 2022-23 AGAR &amp; Certificate of Exemption if applied</li> </ul>	The AGAR 2022-23 was approved by Council 26 June 2023 Mins 214 ii, iii & iv, the RFO had signed off the Statement of Accounts on 2 June 2023	AGAR meeting scheduled for 24 June 2024
		provision during summer 2023 & website- AIAR ICOs  • Public Inspection Period	Date of Announcement – 30 June 2023 Public Inspection period – 3 July to 11 Aug 2023 Evidence – Posting dates on the website  The above period of Public Inspection was approved by Council 26 June 2023 Mins 214 vi,	Proposed Public Inspection Period is 28 June to 8 August 2024

David Buckett Independent Internal Auditor Page 9 of 10

Additional tests – (as necessary)	<ul> <li>The procedures for the backing up of computerised records</li> <li>Council owned PC/laptop?</li> </ul>	There have been no major changes in IT security arrangements since my last visit. Cyber Central is the IT Support company used by the Council. Office 365 software and systems in place. Councillors have been issued with iPads.	Cyber Central manage the email licences for the Council including Cllr email addresses.
	<ul> <li>Trust Funds/Charities – Charity Commission filing?</li> </ul>	Not applicable	
	<ul> <li>Annual review of the effectiveness of Internal Audit inc. Appointment of IIA</li> </ul>	Council 16 June 2023 Min 210 i) that I be appointed as IIA for 2023-24 as recommended by the F&GP Comm 12 June 2023.	
	• Website host and Webmaster and any changes?	Vision ICT Ltd provide the website platform  F&GP 10 July 2023 Min 108 ii) Cllrs to informally monitor the website content and advise the Town Clerk of any issues.	Council 29 Jan 2024 Min 346 – subject to some concerns being satisfied the Council's website to be migrated to a platform provided by Zonkey to include annual hosting.
		Generic Accessibility Statement has a link at the bottom of the website "Home Page".	Went live with Zonkey on Monday 20 May 2024 just before my year-end audit visit.
	TRANSPARENCY CODE     compliant especially for Exempt Authorities	Satswana appointed as the DPO for the Council	
	<ul> <li>Post GDPR (May 2018)</li> <li>Privacy Notice</li> </ul>	Ex-councillors email addresses have been deleted and new Councillors issued with their "generic" email address to be used solely for Town Council business.  Example generic email address  Cllr-Joe.bloggs@broadstairs.gov.uk	To be re-appointed