

Internal Audit Report for Kelsale-cum-Carlton Parish Council for the period ending 31 March 2026

Clerk	Marie Backhouse
RFO (if different)	n/a
Chairperson	Alan Revell
Precept	£27,308.00
Income	£47,308.00
Expenditure	£46,610.96
General reserves	£26,366.25
Earmarked reserves	£52,543.08
Audit type	Annual – non-exempt authority
Auditor name	Sharon Smith

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 adopts 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 2025/26 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 – 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?	Partially	<p>The Council's Standing Orders are based on the latest model published by the National Association of Local Councils. However, the document largely remains in template form and does not appear to have been specifically tailored to reflect the Council's individual governance arrangements or local practices. The Council approved its Standing Orders at a meeting of Council held on 30 April 2025 with a further review approved at a meeting held on 25 February 2026.</p> <p>RECOMMENDATION: The Council may wish to review the Standing Orders and consider tailoring the document to reflect the Council's specific governance arrangements, committee structure, delegated powers and local working practices. This would help ensure that the document operates as a practical governance tool as well as reflecting the latest model provisions published by the National Association of Local Councils.</p>
Are Financial Regulations up to date and reviewed annually?	Yes	<p>The Council's Financial Regulations are based on the latest model published by the National Association of Local Councils. The Council approved its Financial Regulations at a meeting of Council held on 25 March 2026.</p>
Has the Council properly tailored the Financial Regulations?	No	<p>The Council's Financial Regulations are based on the latest model published by the National Association of Local Councils. However, the document largely remains in template form and does not appear to have been specifically tailored to reflect the Council's individual financial arrangements, authorisation procedures or local working practices.</p> <p>RECOMMENDATION: The Council may wish to review the Financial Regulations and consider tailoring the document to reflect the Council's specific financial arrangements, authorisation processes, procurement procedures and local working practices. This would help</p>

		ensure that the Regulations operate as a practical financial control document as well as reflecting the latest model provisions published by the National Association of Local Councils.
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.

¹ Section 151 Local Government Act 1972

Section 2 – 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
<i>Verify that budget has been properly prepared and agreed</i>	Yes	The budget for the year 2025–2026 was formally approved by the Council at its meeting held on 27 November 2024. RECOMMENDATION: To enhance transparency and provide a clear audit trail, the Council may wish to record within the minutes the agreed final budget figure.
<i>Verify that the precept amount has been agreed in full Council and clearly minuted</i>	Yes	The precept was set at £27,308 for 2025-2026 and formally approved by the Council at a meeting held on 27 November 2024. RECOMMENDATION: To enhance transparency, the Council may wish to consider recording in the minutes the Band D Council Tax amount and the equivalent annual and weekly charge payable.
<i>Regular reporting of expenditure and variances from budget</i>	Yes	Quarterly budget monitoring reports are presented to the Council and recorded within the minutes. The reports include budget versus actual income and expenditure, enabling members to monitor expenditure and variances against budget throughout the year.
Reserves held – general and earmarked ²	Yes	The Council held General Reserves of £26,366.25 at year end against net expenditure of £46,610.96, representing 57%. This is within the level recommended in Proper Practices, which suggests that general reserves should typically equate to between 3 and 12 months of Net Revenue Expenditure. While there is no prescribed upper limit for earmarked reserves, these should be held for specific, clearly defined purposes.

² 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 3 – 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		Internal auditor commentary
<i>Is the ledger maintained and up to date?</i>	Yes	The Council uses Scribe Accounting to record the financial transactions of the Council. All transactions are well referenced and provide an effective tool for the basis of the Council's internal controls.
<i>Is the ledger on the correct basis in relation to the gross income/expenditure?</i>	Yes	The Council's gross income and expenditure level is below the threshold of £200,000 and has been for three 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 basis. The 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 Council maintains separate income and expenditure records which appear to be kept up to date, and bank reconciliations are undertaken regularly.
<i>Is the arithmetic correct?</i>	Yes	A number of spot checks were carried out, and the cashbook was found to be in order.

Section 4 – 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	<p>A selection of expenditure items was made and cross-checked against the cash book and bank statements and all were found to be in order.</p> <p>A Finance Report containing payments for approval is considered by the Council at each meeting. However, the report is not appended to the minutes, nor are the payments approved otherwise recorded in sufficient detail within the minutes themselves. As a result, it is not possible to verify from the minutes which payments were presented to and approved by Council in accordance with the Council's Financial Regulations.</p> <p>The absence of this information also limits transparency for residents and reduces the extent to which the minutes demonstrate compliance with the Local Government Transparency Code requirements relating to the publication of expenditure information.</p> <p>RECOMMENDATION: The Council may wish to consider appending the finance report to the minutes, or alternatively recording sufficient detail within the minutes themselves, to provide a clear audit trail of payments presented for approval. This would assist in demonstrating compliance with the Council's Financial Regulations, strengthen transparency and accountability within the payment approval process, and support the Council's wider obligations under the Local Government Transparency Code.</p>
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

		Internal Control Statement details the procedure to be followed for such payments.
Is VAT correctly identified, recorded, and claimed within time limits?	Yes	Recoverable VAT is identified in the cash book with three claims made during the period under review.
Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ³	N/A	The Council has not confirmed that it is eligible to exercise the General Power of Competence.
Are payments under s.137 ⁴ separately recorded, minuted and is there evidence of direct benefit to electorate?	No	<p>No payments have been identified as being incurred under section 137 during the year.</p> <p>However, the Council does not record the statutory power relied upon for each item of expenditure. This makes it difficult to confirm that all payments are supported by an appropriate legal power. Where no specific statutory power exists, expenditure should be identified and recorded as falling under section 137.</p> <p>For example, items such as donations to external organisations may not fall within a specific statutory power and would therefore need to be treated as section 137 expenditure. In such cases, it is important that this is clearly recorded to ensure that cumulative spend does not exceed the statutory limit. For 2025–2026, the section 137 expenditure limit is £11.10 per elector, applied to the number of electors in the Council’s area.</p> <p>RECOMMENDATION: The Council may wish to ensure that the statutory power relied upon for each item of expenditure is clearly recorded within the cash book and/or minutes. Where no specific power applies, expenditure should be identified and recorded under section 137, for example through the use of a separate column within the cash book. This will enable cumulative spend to be monitored</p>

³ Localism Act

⁴ 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 £11.10 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

		against the statutory limit and provide assurance that all expenditure is lawful and within the Council's powers.
Where applicable, are payments of interest and principal sums in respect of loans paid in accordance with agreements?	N/A	The Council has no such loans.

Section 5 – Income controls		
The internal auditor will seek evidence to ensure income is correctly 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 received by the Council is recorded within the accounting records and evidenced within the corresponding bank statements. A sample of income transactions was reviewed during the audit and found to be accurately recorded and banked promptly.
<i>Is income reported to full council?</i>	Yes	Income received is reported to the Council within the Clerk’s report presented at meetings.
<i>Does the precept recorded agree to the Council Tax Authority’s notification?</i>	Yes	The Council received a precept of £27,308.00 during the year under review from East Suffolk Council.
<i>If appropriate, are CIL reporting schedules in accordance with the Regulations?⁵</i>	Yes	The CIL reporting schedule has been prepared in accordance with the Regulations. However, no evidence was identified within the minutes reviewed to confirm that the schedule had been formally presented to or noted by the Council. RECOMMENDATION: The Council may wish to ensure that CIL reporting schedules are formally presented to and noted or approved by the Council, with this clearly recorded in the minutes, in order to provide an audit trail and demonstrate member oversight.
<i>Is CIL income reported to the council?</i>	Yes	CIL income is reported to the Council within the Clerk’s Report.
<i>Does unspent CIL income form part of earmarked reserves?</i>	Yes	CIL funds are held as an earmarked reserve.
<i>Has an annual report been produced?</i>	Yes	The CIL report for the period under review was produced.
<i>Has it been published on the authority’s website?</i>	Yes	The Council published a CIL report for the period under review on the Council’s website.

⁵ Community Infrastructure Levy Regulations 2010

Section 6 – 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>	N/A	The Council does not operate a petty cash system.
<i>If appropriate, is there an adequate control system in place?</i>	N/A	N/A

Section 7 – 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	Monthly bank reconciliations are presented to and reviewed by the Council, as evidenced in the minutes.
<i>Do bank balances agree with bank statements?</i>	Yes	Bank balances agree with bank statements.
<i>Is there regular reporting of bank balances at Council meetings?</i>	Yes	Bank balances are reported to the Council through the presentation of bank reconciliations, as evidenced in the minutes, and are presented on a regular basis.

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	The Council had one employee on its payroll at the period end 31 March 2026. Employment contracts were not reviewed during the internal audit, but the Clerk has confirmed that a Contract of Employment is in place.
<i>Has the Council approved salary paid?</i>	Yes	All salary payments are presented to the Council for approval and payments made in accordance with Council's own Financial Regulations.
<i>Are all employees paid at least the minimum wage?</i>	Yes	The employee's salary exceeds National Minimum Wage requirements.
<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	The payroll function is outsourced to SALC and is operated in accordance with HM Revenue and Customs guidelines. 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 employment 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 payments covering salary and PAYE were found to be in order.
<i>Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation?⁶</i>	Yes	The employee is enrolled in the NEST pension scheme.
<i>Have pension re-declaration duties been carried out</i>	Yes	The Pension Re-declaration was submitted to The Pensions Regulator on 1 April 2026. However, no evidence was identified within the minutes to demonstrate that this had been reported to or noted by Council. While responsibility for compliance rests with the employer, reporting significant statutory submissions to Council helps support transparency and member oversight of the Council's governance and employment obligations. RECOMMENDATION: The Council may wish to ensure that future

⁶ The Pension Regulator – [website click here](#)

		<p>statutory submissions of this nature, including pension re-declarations of compliance, are formally reported to and noted by Council within the minutes. This would provide a clearer audit trail demonstrating member awareness of key compliance obligations undertaken on behalf of the Council.</p>
<p><i>Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?</i></p>	<p>Yes</p>	<p>There is a satisfactory expense system in place and all expenses claimed are approved by the Council with supporting paperwork in place and reimbursed in accordance with Council's Financial Regulations.</p>

Section 9 – Year End procedures		
Evidence		Internal auditor commentary
<i>Are appropriate accounting procedures used?</i>	Yes	Accounts are produced on a receipts and payments basis and all found to be in order.
<i>Financial trail from records to presented accounts</i>	Yes	<p>The end of year accounts were presented for review and confirmation is given that there is a clear financial trail from the accounting records to the presented accounts. Individual bank reconciliations were provided for each bank account held by the Council and these were found to reconcile to the year-end balances presented within the accounts.</p> <p>RECOMMENDATION: Whilst the individual account reconciliations were satisfactory, the Council may wish to consider producing a single consolidated year-end bank reconciliation showing the combined cash position across all bank accounts. This would strengthen the audit trail and provide clearer evidence reconciling the overall bank balances to the accounting records and AGAR Box 8 figure.</p>
<i>Has the appropriate end of year AGAR⁷ documents been completed?</i>	Yes	<p>As the Council is a smaller authority with gross income and/or expenditure exceeding £25,000, it has correctly completed the Annual Governance and Accountability Return (AGAR) Form 3.</p> <p>The Council approved the AGAR prior to receiving the internal audit report for the financial year. Whilst this does not necessarily invalidate the AGAR approval process, it is considered best practice for the internal auditor's report to be received and considered by members before the AGAR is approved, in order to ensure that the Council is able to take full account of the internal auditor's findings when making the governance assertions contained within Section 1 of the AGAR.</p> <p><i>COMMENT: The Council may wish to consider that the internal audit for the financial year is completed and formally considered by members prior to</i></p>

⁷ Annual Governance & Accountability Return (AGAR)

		<i>approving the AGAR, thereby strengthening the Council's governance and assurance framework and providing a clearer audit trail.</i>
<i>Did the Council meet the exemption criteria for 2024-2025 and correctly declared itself exempt?</i>	N/A	As the Council had gross income and expenditure exceeding £25,000 during 2024-2025 it was not able to declare itself exempt from a limited assurance review for the year ending 31 March 2025.
<i>During the period in question did the small authority demonstrate that it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations 2015?</i>	No	<p>It was not possible to verify compliance with the Accounts and Audit Regulations 2015 in relation to the exercise of public rights. The Notices of Public Rights for both 2024–2025 and 2025–2026 could not be located on the Council's website during the audit review and therefore evidence of the publication period and supporting documentation could not be confirmed.</p> <p>RECOMMENDATION: The Council should ensure that the Notice of Public Rights is published on the Council's website within the statutory timeframe each year. The period for the exercise of public rights should also be formally set by the Council and recorded within the minutes of the relevant meeting.</p>
<i>Have the publication requirements been met in accordance with the Regulations?⁸</i>	Partially	<p>In accordance with the Accounts and Audit Regulations 2015, as a smaller authority with either income or expenditure exceeding £25,000 but not exceeding £6.5 million, it is confirmed that the Council partially complied with the requirements of the Accounts and Audit Regulations 2015 for the year ending 31st March 2025 as it published the following on its website:</p> <p>Annual Internal Audit Section 1 - Annual Governance Statement Section 2 - Accounting Statements Section 3 - The External Auditor Report and Certificate</p> <p>As noted above, the notice of the period for the exercise of public rights and other information required by Regulation 15(2) Accounts and Audit Regulations 2015 was not published.</p>

⁸ Accounts and Audit Regulations 2015

Section 10 – 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	Evidence of risk assessment documentation was identified. The Council's Finance and Governance Risk Assessment was approved by the Council at a meeting held on 30 April 2025, and the document is published on the Council's website.
<i>Is there evidence that risks are being identified and managed?</i>	Yes	The Finance and Governance Risk Assessment sets out the Council's key risks together with existing controls and mitigation measures, demonstrating an established approach to risk management.
<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	The Council has insurance in place under a specialist policy with Ansvar which shows core cover for the following: Public/Products Liability: £10m; Employers Liability £10m and Fidelity Guarantee of £25k. The Council reviewed and approved the insurance cover at a meeting held on 30 April 2025.
<i>Evidence that internal controls are documented and regularly reviewed⁹</i>	Yes	The annual Internal Control Statement for the period under review was noted by the Council and signed by the Chair at a meeting held on 25 March 2026.
<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 appointment¹⁰</i>	Partially	<p>The Council's Internal Control Statement confirms that an independent and competent internal auditor is appointed annually and outlines the broad areas subject to internal audit review. The statement also acknowledges the Council's responsibility to undertake an annual review of the effectiveness of internal control, including the effectiveness of internal audit.</p> <p>However, whilst this provides some evidence that the Council has considered its internal audit arrangements, the minutes and supporting</p>

⁹ Accounts and Audit Regulations

¹⁰ Practitioners Guide

		<p>documentation reviewed do not explicitly record consideration of the internal auditor's independence, competence or effectiveness as part of the appointment and review process. As a result, a clear audit trail evidencing the Council's annual assessment of the effectiveness of internal audit could not be fully verified.</p> <p>RECOMMENDATION: When appointing the internal auditor, the Council should explicitly record within the minutes its consideration of the auditor's independence, competence and effectiveness. This could be supported through the use of a simple annual "Review of the Effectiveness of the Internal Auditor" document presented to and approved by the Council.</p>
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Section 11 – 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?¹¹</i>	Yes	The Council maintains an Asset Register in accordance with Proper Practices.
<i>Is the value of the assets included? (Note value for insurance purposes may differ)</i>	Yes	The declared value for all assets at year-end is £70,817.55.
<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 remotely.
<i>Are copies of licences or leases available for assets sited at third party property?</i>	N/A	Licences and leases for assets sited at third party property were not reviewed during the internal audit which was conducted remotely.
<i>Is the asset register up to date and reviewed annually?</i>	Partially	Minutes dated 25 March 2026 record that the asset register had been noted, however, the minutes do not clearly record that the Council formally reviewed and approved the asset register as part of the meeting's decision-making process. RECOMMENDATION: The Council should ensure that the formal review and approval of the asset register is clearly recorded within the minutes.
<i>Cross checking of insurance cover</i>	Yes	Insurance documentation was reviewed during the audit and cross-checked, where possible, against the Council's asset register. Based on the information provided, insurance arrangements and levels of cover were found to be satisfactory.

¹¹ Practitioners Guide

Section 12 – Assertion 10		
The internal auditor will be checking that the council complies to the new assertion 10 introduced in the Practitioners' Guide 2025.		
Evidence		Internal auditor commentary
<i>Has the Council registered with the Information Commissioner's Office (ICO)?¹²</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.
<i>Is there an adopted council publication scheme and is it reviewed regularly?</i>	Partially	<p>The Council has published a Model Publication Scheme. However, the document itself is dated September 2018, whilst the website states that it was adopted in September 2020. This creates some ambiguity regarding when the document was last formally reviewed or approved by Council.</p> <p>As publication schemes should be reviewed periodically to ensure that the information remains accurate, up to date and reflective of current governance arrangements, it is important that review and adoption dates are clearly evidenced and consistent.</p> <p>RECOMMENDATION: The Council may wish to review the Model Publication Scheme and ensure that the document itself clearly records the most recent adoption or review date. Consideration could also be given to formally reviewing and reapproving the Scheme on at least an annual basis to help ensure that it remains current and reflective of the Council's present governance arrangements and publication practices</p>
<i>Is the Council compliant with the General Data Protection Regulation requirements?¹³</i> <i>Councils must:</i> <ul style="list-style-type: none"> <i>Comply with their legal & statutory obligations under UK GDPR & The Data Protection Act 2018</i> 	Yes	<p>The Council has taken steps to address its obligations under the UK General Data Protection Regulation (UK GDPR), including the adoption of relevant policies during the year.</p> <p>The following documents were approved by the Council at meetings held on 25 June 2025, 30 July 2025, 27 August 2025, 29 October 2025 and 28 January 2026:</p>

¹² Data Protection Act 2018

¹³ UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

<ul style="list-style-type: none"> • <i>Process personal data lawfully, fairly and in line with the prescribed data protection principles</i> • <i>Recognise their role as both data controller and data processor</i> 		<ul style="list-style-type: none"> • Data Retention Policy • Data Breach Policy • Subject Access Policy, Procedure and Request Form • Data Protection Statement • GDPR Risk Assessment • Privacy Notice <p>RECOMMENDATION: The Council should consider undertaking a Data Audit to ensure a complete and robust framework in line with UK GDPR requirements. The Council should also consider implementing periodic data protection training for Councillors and staff to strengthen awareness, mitigate risk and support continued compliance.</p>
<p><i>Has the Transparency Code been correctly applied, and information published in accordance with current legislation?</i></p>	<p>N/A</p>	<p>Whilst the Local Government Transparency Code 2015 formally applies to local authorities, including parish councils, with annual income or expenditure (whichever is the higher) exceeding £200,000, the Smaller Authorities Proper Practices Panel (SAPPP) Practitioners' Guide advises that smaller authorities with annual turnover or expenditure between £25,000 and £200,000 should, as a matter of best practice, seek to comply with the principles of the Code. The government's stated position is that, unless there are legitimate sensitivities preventing disclosure, data held and managed by local authorities should be publicly accessible.</p> <p><i>COMMENT: The Council may wish to review its current transparency arrangements and consider working towards fuller compliance with the publication requirements and timescales set out within the Local Government Transparency Code 2015.</i></p>
<p><i>Has the Council published a website accessibility statement on their website in line with Regulations?¹⁴</i></p>	<p>Yes</p>	<p>The Council has published an accessibility statement on its website in line with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.</p>
<p><i>Has website accessibility been tested, at least annually?</i></p>	<p>Yes</p>	<p>The Council's website includes an Accessibility Statement, prepared on 19 May 2025, which confirms compliance with the Web Content Accessibility</p>

¹⁴ Website Accessibility Regulations 2018

		<p>Guidelines (WCAG) 2.2 AA standard. During the audit, the Clerk provided evidence that the website was tested for accessibility compliance on 17 April 2026. This provides satisfactory evidence that accessibility compliance is being actively monitored and reviewed.</p> <p><i>COMMENT: Whilst evidence of accessibility testing was provided during the audit, the Council may wish to include the date of the most recent accessibility test within the published Accessibility Statement to provide greater transparency and demonstrate ongoing compliance with accessibility requirements.</i></p>
<p>Does the council have, as a minimum, a single generic email address on an authority owned domain, for correspondence?¹⁵ For example clerk@abccouncil.gov.uk or clerk@abccouncil.org.uk</p>	Yes	<p>The Council operates with gov.uk email addresses for the Clerk and Councillors demonstrating that the Council has an official status thereby building trust, credibility and authenticity.</p>
<p>Does the council have an IT policy that is tailored to the council?¹⁶</p>	Yes	<p>The Council has adopted an IT policy that has been tailored to the Council. This policy was approved at a meeting of the Council held on 26 November 2025.</p>

¹⁵ Practitioners Guide

¹⁶ Practitioners Guide

Section 13 – 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
<i>Has the Council considered the previous internal audit report?</i>	Partially	<p>The minutes of a meeting held on 28 May 2025 indicate that matters arising from the internal audit report for the period ending 31 March 2025 were discussed, with the Clerk highlighting several recommendations and actions arising from the audit. However, the minutes do not clearly record that the Council formally received the internal audit report itself, nor whether any recommendations were formally adopted by Council.</p> <p>RECOMMENDATION: The Council may wish to ensure that future minutes clearly record the formal receipt and consideration of internal audit reports, including any recommendations arising and any actions agreed by Council in response. This would provide a clearer audit trail demonstrating that the Council has considered and responded to matters identified through the internal audit process.</p>
Has appropriate action been taken regarding the recommendations raised?	Partially	<p>Three recommendations were raised during the previous internal audit. Appropriate action has been taken to address two of these matters, namely ensuring that the first item of business at the Annual Meeting of the Council is the election of the Chairman and undertaking an up-to-date accessibility test of the Council’s website.</p> <p>The third recommendation related to the formal approval of the internal auditor’s letter of engagement alongside the annual appointment of the internal auditor. Whilst the minutes of 28 January 2026 confirm that the Council approved the appointment of the internal auditor for the current financial year, no evidence could be identified to confirm that the associated letter of engagement was also formally approved. Formal approval of the engagement terms helps demonstrate that the scope of the audit, responsibilities and reporting arrangements have been properly reviewed and agreed by members.</p>

		<p>RECOMMENDATION: The Council should formally approve the internal auditor’s letter of engagement annually alongside the appointment of the internal auditor, with this approval clearly recorded within the Council minutes.</p>
<p><i>Has the Council confirmed the appointment of an internal auditor?¹⁷</i></p> <p><i>Has the letter of engagement been approved by full council?¹⁸</i></p>	<p>Partially</p>	<p>The minutes of 28 January 2026 confirm that the Council formally approved the appointment of the internal auditor for the current financial year. However, no evidence was identified to demonstrate that the internal auditor’s letter of engagement has been considered or approved by Full Council.</p> <p>RECOMMENDATION: As noted above, the Council should formally approve the internal auditor’s letter of engagement annually alongside the appointment of the internal auditor, with this approval clearly recorded within the Council minutes.</p>

¹⁷ Practitioners’ Guide

¹⁸ Practitioners’ Guide

Section 14 – 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
<i>Has the Council considered the previous external audit report?</i> ¹⁹	Partially	The minutes record that the External Audit report contained no matters for concern. However, the minutes do not clearly evidence that the External Auditor’s report itself was formally received by the Council. RECOMMENDATION: The Council may wish to ensure that future minutes clearly record the formal receipt and noting of the External Auditor’s report by Council. This would provide a clearer audit trail demonstrating member awareness and consideration of the outcome of the external audit process.
<i>Has appropriate action been taken regarding the comments raised?</i>	N/A	There were no matters raised.

¹⁹ 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 15 – 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
<i>Was the annual meeting held in accordance with legislation?</i> ²⁰	Yes	The Annual Meeting of the Council was held on 28 May 2025 and the first item on the agenda was the election of Chair.
<i>Is there evidence that Minutes are administered in accordance with legislation?</i> ²¹	Yes	<p>The Council is aware of its obligations under Schedule 12, paragraphs 41(1) and 44 of the Local Government Act 1972, which require that minutes are formally approved (with any necessary amendments) at the next meeting and signed by the Chair.</p> <p>The minutes record individual abstentions when approving the minutes of previous meetings, including where councillors were not present at the original meeting being approved. While councillors may choose to abstain in such circumstances, and the Council may have adopted an informal practice of doing so, this level of detailed voting record is not generally necessary unless a recorded vote has been requested in accordance with Standing Orders and Schedule 12 to the Local Government Act 1972. In most cases, it is sufficient for the minutes simply to record that the previous minutes were approved, or approved subject to amendment.</p> <p><i>COMMENT: The Council may wish to review the level of detail recorded in relation to approval of previous minutes. Consideration could be given to recording only the resolution itself unless a recorded vote is specifically requested, thereby simplifying the minutes while still maintaining an appropriate and lawful record of proceedings.</i></p>
<i>Is there a list of members' interests held?</i>	Yes	Evidence was seen on the District Authority's website the Register of Interests for all current Councillors with a direct link from the Council's own website.

²⁰ The Local Government Act 1972 Schedule 12, paragraph 7 (2) and Schedule 15 (2)

²¹ Public Bodies (Admission to Meetings) Act 1960, Local Government Act 1972, and the Localism Act 2011

<i>Does the Council have any Trustee responsibilities and if so, are these clearly identified in a Trust Document?</i>	N/A	The Council has no Trust responsibilities.
<i>Is there evidence that electronic files are backed up?</i>	N/A	The existence and operation of electronic file backup arrangements was not independently verified during the audit, as the internal audit was undertaken remotely.
<i>Do terms of reference exist for all committees and is there evidence these are regularly reviewed?</i>	N/A	The Council has no declared committees.

Signed: *Sharon G. Smith*

Date of Internal Audit review: 12-18 May 2026

Date of Internal Audit Report: 18 May 2026

On behalf of Suffolk Association of Local Councils