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| <p><b>Risk Assessment</b></p> <p><b>HIGH</b> 0</p> <p><b>MEDIUM</b> 0</p> <p><b>LOW</b> 16</p> | <p style="text-align: center;"><b>New Romney Town Council</b><br/> <b>INTERNAL AUDIT 2020-2021</b><br/> <b>AUDIT PLAN WITH COMMENTS / FINDINGS</b></p> <p>I am pleased to report to Members of the New Romney 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 2021, following my audit visit and subsequent conversations on 14 May 2021.</p> <p>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.</p> <p>I would like to take this opportunity to thank the Town Clerk &amp; RFO, Mrs Cathy Newcombe and the Deputy Town Clerk Mrs Tracy Morris for their assistance given to me during my audit visit.</p> |   |
| <p style="text-align: center;"><b>Area</b></p>   | <p style="text-align: center;"><b>Item</b></p>  | <p style="text-align: center;"><b>Comments / Findings</b><br/> <b>Year-end Audit 31 March 2021</b></p>  |
| <p><b>Previous Audits</b></p>  | <ul style="list-style-type: none"> <li>• <b>Date of last External Audit Certificate or Exemption Certificate for 2019-20</b></li> <li>• Comments if any</li> <li>• Publication on website.</li> <li>• Date of last Internal Audit</li> <li>• Comments if any</li> <li>• Review of any items outstanding from previous internal / external audit reports.</li> </ul>   | <p>PKF Littlejohn signed off the AGAR 2019-20 on 12 November 2020. The Town Clerk advised that Cllrs were sent a copy of the Section 3 of the AGAR soon after it was received but unfortunately was not placed on a Council agenda for formal ratification, an oversight.</p> <p>No comments</p> <p>Posted to the website</p> <p>20 May 2020 considered by Council 8 July 2020 Min 26/2020-21 (i)</p> <p>The outstanding matters were highlighted at the Council Meeting held on 17 March 2020-21 Min 49/2020-21, primarily caused by the prolonged and on-going coronavirus.</p> |
| <p><b>Minutes</b></p>  | <ul style="list-style-type: none"> <li>• Scan of the minutes of the Council's meetings and the Finance Committee.</li> <li>• <b>Virtual Meetings ?</b></li> <li>• <b>General Power of Competence (GPC) ?</b></li> <li>• Dispensations</li> <li>• S.40 LA&amp;A Act 2014 filming/recording</li> </ul>  | <p>Virtual Meetings commenced on 29 June 2020, the first Meeting since the Especial Meeting held on 18 March 2020.</p> <p>The Agenda contains a guide for the general public on the protocol for dealing with questions from the public at a Virtual Meeting.</p> <p>General Power of Competence approved by Council on 15 May 2019 Min 031/2019-20 for the next 4 years subject to retaining the necessary qualification criteria.</p>   |

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| Code of Conduct/<br>Acceptance of Office     | <ul style="list-style-type: none"> <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>   | <p>16 Cllrs (two wards Town and Coastal)</p> <p>Cllr Phipps resignation – Council 14 Oct 2020 Min 161/2020-21 A by-election had been called which meant the election would take place on 6 May 2021 because of the coronavirus legislation.</p> <p>Cllr Ebrey-Cramp resignation – Council 10 Feb 2021 Min 429/2020-21 it has been subsequently reported that a by-election had been called, to be held on 6 May 2021.</p> <p>NB both by-elections were uncontested as reported to Council 14 April 2021 Min 545/2020-21 Cllrs Carey and Davies</p> <p>The DPI's for the two recently elected Cllrs Carey and Davies have not been published by the District Council yet.</p> <p><b>The Grievance Panel considered the outcome from a Local Code of Conduct Investigation alongside its own grievance investigation, which involved bullying of staff and upheld the grievance. The Council resolved to apologise to the relevant Council Officers and the Council/Officer protocols strengthened, a new Anti-Bullying Policy linked to the Grievance and Complaints Procedures be introduced. Council 14 October 2020 Min 166/2020-21. The Council as a corporate body has a “duty of care” towards its staff and individual Councillors must respect this.</b></p> <p>Next full Election due May 2023</p> |
| Standing Orders and<br>Financial Regulations | <ul style="list-style-type: none"> <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>• <b>Virtual Meetings / Delegation to Clerk/RFO re Covid -19 ?</b></li> <li>• <b>Updated re New NALC Models SO's 2018, Fin Regs 2019 ?</b></li> <li>• Two signature rule still in place?</li> </ul> | <p>Council 29 June 2020 (Min 010/2020-21) approved a substantial overhaul of the Standing Orders and Financial Regulations including a re-numbering of the Financial Regulations.</p> <p>As reported last year Council approved a Coronavirus Scheme of Delegation to the Town Clerk and/or Deputy Town Clerk in consultation with the Chairman and/or Vice Chairman for an initial period of 6 months to 30 Sept 2020- Council 18 Mar 2020 Min 685/2019-20. A good system of recording the “delegated decisions” was established, which were also posted to the website.</p> <p>Council 16 Sept 2020 Min 118/2020-21 approved an extension to the end of the current civic year (May 2021) and that “remote meetings” be held until the end of the civic year.</p> <p>Council 17 March 2021 Min 491/2020-21 (iii) the current emergency extended delegation be extended again until end of Sept 2021.</p> <p>Standing Orders were amended following the outcome of an ACAS COT3 Agreement relating to Councillor/Officer Relations – Council 13 Jan 2021 Min 376/2020-21. Also Disorderly Conduct at meetings Council 16 Dec 2020 Min 323/2020-21</p> <p>Further review of both documents – Council 17 March 2021 Min 489/2020-21</p>   |

Risk Management

- **Risk Assessments** – Are they:
  - Carried out regularly?
  - Adequate?
  - Reported in the minutes?
  - **ANNUAL REVIEW ?**
- Insurance cover – is it:
  - Appropriate/Adequate?
  - LTA in place?
  - Reviewed regularly?
  - Fidelity Guarantee Cover £ (Balances + ½ Precept)
- Internal controls – are they:
  - Documented?
  - Adequate?
  - Reviewed regularly?
  - **Statement of Internal Control (SIC)?**
- Systems and Procedures – are they:
  - Documented?
  - Adequate?
  - Followed?
  - Reviewed regularly?

Risk Management Statement 2019-20 approved by Council 8 July 2020 Min 025/2020-21

Risk Management Statement 2020-21 approved by Council 17 March 2021 Min 489/2020-21

A 3-year Long-term Agreement (LTA) with Zurich Municipal was approved by Council 25 March 2019 to run to April 2022. The policy includes motor cover.

£2m Fidelity cover

Review of effectiveness of Internal Control Procedures 2019-20 – Council 8 July 2020 Min 026/2020-21 (ii) & (iii)

**The usual Financial Checks during 2020-21 were not undertaken due to the pandemic restrictions, the two Cllrs appointed to undertake the checks were self-isolating and staff were working from home, making it impossible to do.**

**Post Audit Note: Financial Checks 2021-22 Annual Council 5 May 2021 Min 020/2021-22 Cllrs Tillson and Davies appointed to undertake monthly finance checks for 2021-22.**

There are numerous “procedures and policies listed on the Council’s website ranging from allotments, hut & winch sites to the Standing Orders and Code of Conduct for Members. Additions have been “delegated decisions” related to the pandemic situation.

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| <p><b>Budgetary Controls</b></p>  | <ul style="list-style-type: none"> <li>• Is the annual budgeting process reported and approved by the Council? <ul style="list-style-type: none"> <li>○ <b>Budget/Precept amounts minuted?</b></li> </ul> </li> <li>• Is the actual performance against the budgets reported to the Council during the year <ul style="list-style-type: none"> <li>○ Compare with Fin Regs?</li> </ul> </li> <li>• Are significant variances explained in sufficient detail?</li> <li>• <b>Covid-19 implications ?</b></li> </ul> | <p>The Financial Reports to Council include a bank reconciliation, a list of receipts and list of payments to be approved by Council.</p> <p>Fin Regs requires Qtrly Monitoring of Budgets, during 2020-21 this was not strictly followed due to the pandemic and technical issues with the virtual meetings. These reports are presented to F&amp;GP Comm eg 21 Oct 2020 Min 192/2020-21 (iii) to 30 Sept 2020, 24 March 2021 Min 516/2020-21,</p> <p>F&amp;GP 25 Nov 2020 co-ordinated the Budget bids from the Committees and recommended to Council a net Budget of £366,661 Min 281/2020-21.</p> <p>Council on 13 Jan 2021 approved a Net Budget and Precept of £361,000 (£366,369 for 2020-21) to ensure there was no increase in the New Romney TC element of the Council Tax Bill for 2021-22 (Min 375/2020-21) Details of the Budget/Precept 2021-22 were published in a Press statement and Advert.</p> |
| <p><b>Section 137 expenditure</b></p> <p><b>£8.32 FOR 2020-21</b><br/>(£8.12 FOR 2019-20)</p> | <ul style="list-style-type: none"> <li>• What is the cash limit for the year?</li> <li>• Is a separate account/analysis kept?</li> <li>• Has the cash limit been exceeded?</li> <li>• Have the spending powers been properly used and Minuted?</li> </ul>   | <p>Not necessary with GPC in place.</p>   |
| <p><b>Book-keeping</b></p>  | <ul style="list-style-type: none"> <li>• Cashbook - is it: <ul style="list-style-type: none"> <li>○ Fit for purpose?</li> <li>○ Up to date?</li> <li>○ Arithmetically correct?</li> <li>○ Balanced regularly?</li> </ul> </li> </ul>  | <p>There has been no change to the accounting arrangements during 2020-21.</p>  |

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| <p><b>Petty Cash</b></p> | <ul style="list-style-type: none"> <li>• Has the amount of petty cash float been agreed?</li> <li>• Are all petty cash entries recorded?</li> <li>• Are payments made from petty cash fully supported by receipts / VAT invoices?</li> <li>• Are petty cash reimbursements signed for?</li> <li>• <b>Date of last petty cash reimbursement ?</b></li> <li>• Is petty cash balance independently checked regularly</li> </ul>   | <p>The Council does have a Petty Cash float of £200, which is largely used for postage stamps and re-imbursement of incidental expenses.</p> <p>Sample checked several re-imbursements made during the year.</p>  |
| <p><b>Payroll</b></p>    | <ul style="list-style-type: none"> <li>• <b>Who is on the payroll and are contracts of employment in place?</b></li> <li>• Who is the RFO?</li> <li>• <b>Annual Appraisal in place ?</b></li> <li>• Have there been any changes to the establishment during the year?</li> <li>• Have there been any changes to individual contracts during the year?</li> <li>• Have new appointments and changes to contracts been approved and minuted?</li> <li>• Do salaries paid agree with those approved by the Council?</li> <li>• Have PAYE/NIC requirements been properly applied and accounted for?</li> <li>• Payroll outsourced?</li> <li>• <b>WORKPLACE PENSION IN PLACE</b></li> </ul> | <p>Current staff as per website<br/>Most "office based" staff have worked from home during the pandemic and attended the "virtual meetings" as necessary.</p> <p>Town Clerk &amp; RFO (22.5hrs pw)<br/>Deputy Town Clerk &amp; Finance Officer (19.5hrs pw)<br/>Planning Clerk (14hrs pw) NB the current staff member is retiring in July 2021<br/>Facilities &amp; PR Clerk (15hrs pw)<br/>Mayor's Secretary &amp; Clerical Asst (increased from 6hrs to 9hrs pw from April 2020 and job title amended to reflect the importance of the Mayor's Secretary role)<br/>Parish Caretaker (32hrs pw)<br/>Asst Caretaker – 25 hrs pw<br/>Town Sergeant &amp; Mayor's Sergeant (ad hoc hours as required)</p> <p>Payroll outsourced to S H Bureau Payroll &amp; Bookkeeping Services P60's and payroll records checked.</p> <p>LGPS – 6 staff have opted into the pension scheme.</p> |

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| <p><b>Payments</b></p> | <ul style="list-style-type: none"> <li>• Are all payments recorded and supported by appropriate documentation?</li> <li>• Are payments minuted?</li> <li>• Review of DD's and SO's ?</li> <li>• <b>STAFF costs definition for inclusion in Box 4 for 2020-21, check parity for 2019-20 ? Currently includes salary, tax, NIC &amp; Pension (employee &amp; ers) + taxable benefits ( home working allowance, broadband &amp; phone allowance etc NOT incl.</b></li> <li>• Has VAT been identified, recorded and reclaimed?</li> <li>• Have internal control procedures been adhered to?</li> <li>• Contracts: <ul style="list-style-type: none"> <li>○ What contracts exist?</li> <li>○ Compliance with SO's</li> <li>○ Have any new contracts or contract variations/extensions been awarded in the year?</li> <li>○ Procedures adopted for letting of contracts</li> <li>○ Have contract payments been made in accordance with the contract document?</li> </ul> </li> </ul> | <p>Detailed payment reports are made available to Cllrs as part of the Council Agenda, the list of payments are listed within the "agenda".</p> <p>Schedules of the payments and receipts are normally presented to the Monthly Council Meetings, these are also on the Council's website.</p> <p>There are a few DD's in place for utility supplies and services, which are reviewed and re-approved annually</p> <p>The collation of the staff costs follows the Box 4 definition.</p> <p>VAT Claimed 1 Oct 2019 to 30 Sept 2020 - £10,722<br/> VAT to claim from 1 Oct 2020 to 31 March 2021 = £7,141</p> <p><b>Sample of contracts in place:-</b></p> <p>We-Weld – contract for the supply and installation of bollards at St Martin's Field following an illegal occupation earlier in the year.</p> <p>MPR IT Solutions and TROOLI re upgrade to Town Hall IT systems and telephony</p> <p>Landscape Services – play &amp; gym equipt inspection services</p> <p>BILT Ltd – builders merchants trade account set-up following the closure of Travis Perkins</p> <p>S H Bureau Ltd – payroll services</p> <p>B E Ames Ltd re annual contract to inspect the roof and rainwater goods at the Assembly Rooms, Community Hall and Maude Pavilion – contracts extended F&amp;GP 24 Aug 2020 Min 077/2020-21(i)</p> <p>Printform Direct – stationery supplies</p> <p>Veolia – 1100 ltr euro bin – Town Hall</p> <p>M Coleman Arboricultural Services – Grounds Mtce – (new 3-year contract for various sites approved F&amp;GP 21 Oct 2020 Min 194/2020-21), Allotment Gardens 2021-22 (F&amp;GP 2 Dec 2020 Min 291/2020-21)</p> <p>The Computer Lady Ltd – remote IT support</p> <p>Rolfe DIY</p> <p>C Simm – window cleaning Town Hall &amp; Assembly Rooms</p> <p>Red Alert Security – CCTV works/support</p> |
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| <p><b>Receipts</b></p>                             | <ul style="list-style-type: none"> <li>• Are all receipts recorded correctly?</li> <li>• Are all receipts promptly banked?</li> <li>• Precept, CTSG and Sect 136 payments</li> <li>• Are internal controls of cash adequate?</li> <li>• Are invoicing arrangements adequate?</li> <li>• <b>Covid-19 implications?</b></li> </ul>  | <p>The Council approved the waiving of certain rental charges during 2020 due to the pandemic eg TS Veteran HQ Site and Hut Site No 40.</p> <p>Charges, Rents &amp; Fees – F&amp;GP approved “no changes” to the charges etc for 2021-22 except for the Civic Attendance Fees – F&amp;GP 25 Nov 2020 Min 278/2020-21</p> <p>CIL monies received in 2020-21 = £12,282</p>   |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |
| <p><b>Bank reconciliation &amp; PWLB Loans</b></p> | <ul style="list-style-type: none"> <li>• What current/deposit accounts exist?</li> <li>• FSCS aware and compliant?</li> <li>• Are bank reconciliations regularly carried out for each account?</li> <li>• Level of Balances to Precept ratio</li> <li>• Are the cheque counterfoils, paying-in books and bank statements adequately referenced?</li> <li>• When was the last review of the banking arrangements?</li> <li>• <b>Internet Banking/Corporate Card and if in place Financial Regs updated ?</b></li> <li>• Signature review (Two signatures required?)</li> <li>• Any PWLB loans ?</li> </ul> | <table border="0"> <tr> <td>NSI Income Bond (3900)</td> <td style="text-align: right;">£651,453</td> </tr> <tr> <td>NatWest Business Reserve a/c (0530)</td> <td style="text-align: right;">£482,938</td> </tr> <tr> <td>Lloyds Bank Business a/c (1868)</td> <td style="text-align: right;">£55,701</td> </tr> <tr> <td>Unity Trust Bank a/c (7680)</td> <td style="text-align: right;">£67,865</td> </tr> <tr> <td>NatWest Current a/c (0942)</td> <td style="text-align: right;">(£997)</td> </tr> <tr> <td><b>Total Bank balances as at 31 March 2021</b></td> <td style="text-align: right;"><b>= £1,256,960</b></td> </tr> </table> <p>Lloyds Multipay card via Unity Trust Bank from February 2021 monthly spend limit £3,000 Town Clerk and Deputy.</p> <p>Bank signatories confirmed by Council as part of the Coronavirus response – 18 March 2020 Min 685/2019-20 Officers – Town Clerk and Deputy Town Clerk<br/>Councillors – Coe, Hiscock, Metcalfe, Thomas, Rivers and Lonbay-Kapoor (reconfirmed by Council 8 July 2020 Min 024/2020-21)</p> <p>The Council resolved to seek approval of a PWLB Loan of £1m repayable over 40 years in January 2020 but the loan has not been pursued during 2020-21, the used “budget for loan charges” was vired to the Community Hall/Sports Pavilion Project reserve Fund – F&amp;GP 21 Oct 2020 Min 192/2020-21 (i) &amp; 20 Jan 2021 Min 391/2020-21</p> | NSI Income Bond (3900) | £651,453 | NatWest Business Reserve a/c (0530) | £482,938 | Lloyds Bank Business a/c (1868) | £55,701 | Unity Trust Bank a/c (7680) | £67,865 | NatWest Current a/c (0942) | (£997) | <b>Total Bank balances as at 31 March 2021</b> | <b>= £1,256,960</b> |
| NSI Income Bond (3900)                             | £651,453  |  |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |
| NatWest Business Reserve a/c (0530)                | £482,938  |  |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |
| Lloyds Bank Business a/c (1868)                    | £55,701   |  |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |
| Unity Trust Bank a/c (7680)                        | £67,865   |  |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |
| NatWest Current a/c (0942)                         | (£997)  |  |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |
| <b>Total Bank balances as at 31 March 2021</b>     | <b>= £1,256,960</b>   |  |                        |          |                                     |          |                                 |         |                             |         |                            |        |  |                     |

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| <p><b>Assets and Asset Register (AR)</b></p> | <ul style="list-style-type: none"> <li>• Are all the material assets owned by the Council recorded in an AR ?</li> <li>• Is the AR up to date?</li> <li>• Basis of Asset Values?</li> <li>• Are investments recorded?</li> <li>• Are the valuations regularly reviewed?</li> <li>• Does the AR show the insurance values ?</li> <li>• Digital Photographic evidence?</li> <li>• Is there a separate Inventory List of low value items (e.g. below the insurance excess levels) ?</li> </ul>   | <p>High Street Bench (Magnox grant funded)<br/>St Martin's Field Bollards<br/>New IT and Telephony equipment as approved by Council 16 Dec 2020 Min 324/2020-21</p> <p>Capital Project – Community Hall and Sports Pavilion Project – reported at Council 16 Sept 2020 that planning permission had been granted and negotiations underway with regard to the s106 agreement</p> <p>Future transfer of assets from Folkestone &amp; Hythe DC including play areas and toilets mentioned in the Minutes during 2020-21 Civic Year. The Town Clerk advised that a lease agreement is being drawn up for the Town Council to take over the management of the Station Road Play Area (40 year lease likely to be completed in 2021-22).</p> <p>The toilets on The Greens have been managed since 1974 by the District Council but it has recently been established that they are, in fact, the property of the Town Council – so maintenance costs have reverted back to the Town Council with effect from April 2021. However, there is a proposed conversion project in development – which would see the building converted to a Wing Surfing School with a public toilet attached. If this goes through to completion, this will then bring in a small income for the Town Council from rent.</p> |
| <p><b>Year-end procedures Inc. AGAR</b></p>  | <ul style="list-style-type: none"> <li>• Does the <b>2020-21 AGAR Statement of Accounts</b> agree with the cashbook?</li> <li>• Is there an audit trail from the financial records to the accounts?</li> <li>• Have debtors and creditors been properly recorded?</li> <li>• <b>Date of approval of 2019-20 AGAR &amp; Certificate of Exemption if applied</b></li> <li>• <b>PROOF of public rights provision during summer 2020 &amp; website– AIAR ICO L</b></li> <li>• New governance compliance regime - refer to new <b>Practitioners' Guide 2020</b></li> </ul> | <p>Accounting records were checked against the figures to be used in the AGAR Statement of Accounts for 2020-21, including the Bank Reconciliation.</p> <p>The AGAR 2019-20 was approved by Council on 8 July 2020 Min 028/2020-21(ii)(a)&amp;(b). The RFO signed off the Statement of Accounts on 20 May 2020.</p> <p><b>Date of Announcement - 6 August 2020</b><br/><b>Public Inspection period – 10 August to 21 September 2021</b><br/><b>Evidence – Facebook posting shows announcement/posting date of 6 August 2020</b></p>   |



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| <p>Additional tests –<br/>(as necessary)</p> | <ul style="list-style-type: none"> <li>• Computer systems: <ul style="list-style-type: none"> <li>○ The procedures for the backing up of computerised records</li> <li>○ Council owned PC/laptop ?</li> <li>○ <b>Email security</b></li> <li>○ <b>Encryption of data?</b></li> </ul> </li> <li>• Record keeping and the arrangements in place to store previous year's accounts etc.</li> <li>• Annual review of the effectiveness of Internal Audit inc. Appointment of IIA</li> <li>• <b>Website host and Webmaster and any changes?</b></li> <li>• <b>Website functionality &amp; accessibility (23 Sept 2020 deadline) NALC L09-18</b></li> <li>• TRANSPARENCY CODE compliant ?</li> <li>• <b>Post GDPR (25 May 2018)</b> <ul style="list-style-type: none"> <li>○ <b>Privacy Notice</b></li> <li>○ <b>CIIR email addresses?</b></li> <li>○ <b>Email disclaimer</b></li> <li>○ <b>Other matters inc DPO arrangements</b></li> </ul> </li> </ul> | <p>MPR IT Solutions &amp; TOOLI providing IT support and broadband services as part of the Upgrade of the Town Hall IT Systems Council 16 Dec 2021 Min 324/2020-21<br/>Includes hi-speed broadband, Office 365 systems and internet phones.</p> <p>New laptops were purchased to facilitate staff working from home during the pandemic.</p> <p>Review of effectiveness of Internal Audit 2019-20 – Council 8 July 2020 Min 026/2020-21 027/2020-21</p> <p>Vision ICT Ltd website provider</p> <p>Accessibility Statement provided by Vision ICT last updated Feb 2020 available at the foot of the website “home page”. The functionality of the website is good. Well done.</p> <p>Satswana – DPO services</p> <p>All staff have generic style eg <a href="mailto:town.clerk@newromney-tc.gov.uk">town.clerk@newromney-tc.gov.uk</a> Councillors have been issued with their generic email addresses for use with their laptops to be used solely for Council business.<br/>The Town Clerk advised that one Councillor has refused to take possession of the laptop and does not use her assigned email address. Hard copy Council Papers are sent to the Councillor.</p> |
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