

Pilling Parish Council
Internal Audit Report
2023 – 2024

The internal audit was carried out on by Ms Alison May
Following guidance in the Joint Panel on Accountability and Governance (JPAG) 2023 edition

<p>A. Appropriate accounting records have been properly kept throughout the year.</p> <p>AND</p>	<p>a) Ensure the correct roll forward of the prior year cashbook balances to the new financial year.</p> <p>b) Check a sample of financial transactions in cashbooks to bank statements, etc: the sample size dependent on the size of the authority and nature of accounting records maintained.</p>	<p>a) The statement of account analysis shows that the correct prior year balance of £75,269 was brought forward into the 23/24 financial year.</p> <p>b) Random Samples of invoices against bank statements were made for April, August and January. In addition, payments in September and February were checked against the minutes.</p> <p>Issues were identified with the incorrect recording of finances within the staff cashbook, formulas within the spreadsheet not working, missing pension figures and an overpayment of £100 in March to the clerk following an increase in the salary standing order. Problems with the salary cashbook started in April and this has had a knock-on effect throughout the year with the quarterly budget figures not tallying with the costs incurred. Receipts to repay an overpayment of salary, recovered in April, May June and July in respect of the clerk were not shown as receipts within the main cashbook but as deductions within the staff cash book. Staff costs in the minutes did not tally with either cashbook. The council currently operates a system of salaries being paid partly by standing order and partly by cheque. Where other expenses have been incurred these have been paid on the same cheque. This has increased the risk of incorrect accounting and has resulted in an unclear audit trail in respect of salaries and expenses.</p> <p>One invoice of £50 for trees was annotated as the village hall when it should have been the methodist Church.</p>	<p>It is recommended that the council makes one payment each month for salaries in line with standard employment procedures.</p> <p>It is recommended that two streams of payment are maintained – one for salaries and one for expenses with two separately documented payments.</p> <p>It is recommended that the council avails itself of on-line banking within Unity rather than making its payments via cheque.</p> <p>It is recommended that while cheques are still being issued that the cheque number is included in the minute reference.</p>
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<p>I. Periodic bank account reconciliations were properly carried out during the year.</p>	<p>c) Ensure that bank reconciliations are prepared routinely, are subject to independent scrutiny and sign-off by members.</p>	<p>Recommend that in line with NALC'S model financial regulations:</p> <p>6.18. Any corporate credit card or trade card account opened by the council will be specifically restricted to use by the Clerk and shall be subject to automatic payment in full at each month-end. Personal credit or debit cards of members or staff shall not be used under any circumstances.</p> <p>Minute 5287 re-affirmed that the council is eligible to use the General Power of Competence. A copy of the clerks CILCA certificate dated 23 January 2008 and subsequent certificate for section 7, General Power of Competence dated January 2013 was seen.</p> <p>The internal auditors report and Parish Council Action Plan was noted and accepted with actions to be implemented, however some of the issues still exist and no evidence could be found of Standing Orders and Financial Regulations having been updated since 2023.</p> <p>c) Monthly bank reconciliations are minuted each month in the format below Bank reconciliation and Budget monitoring to 30 June was scrutinised and accepted at minute 5314. Quarterly scrutiny is shown as follows: The first quarter accounts were scrutinised by the finance committee and accepted by councillors at minute 5 of the committee on 25 October 23.</p>	
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	<p>d) Verify the accuracy of the year-end bank reconciliation detail and ensure accurate disclosure of the combined cash and bank balances in the AGAR, section 2, line 8.</p> <p>e) Where the authority has bank balances in excess of £100,000 it has an appropriate investment strategy.</p> <p>f) Is the cash book maintained and up to date?</p>	<p>d) Year-end information on the accounting report shows £91,044.39 as the year end cash and bank balances and this corresponds to the figure entered on the AGAR.</p> <p>e) There are times within the financial year when balances are in excess of £100,000. The council has an investment policy, last updated in March 2023 and there is evidence of ongoing and managed investment. There is evidence that the council does not always keep balances below the £85,000 Financial Services Compensation Scheme limit.</p> <p>Minute 5408 states that a review of the Investment Policy by the finance committee in January found that Pilling Parish Council does not meet the minimum criteria to consider this policy, however, minute 5262 states that the council resolved to accept the policy in March 2024.</p> <p>f) Yes.</p>	<p>It is recommended that balances held within one bank are kept below the £85,000 limit as soon as possible. If necessary, a further reserve account should be opened.</p> <p>As the council does at certain times within the financial year have over £100,000 to manage it does need an investment policy in order to ensure that the maximum return is received for those funds regardless of how short a period they may be invested.</p>
<p>B. This authority complied with its financial regulations, payments were supported by invoices, all</p>	<p>a) Review the procedures in place for acquisition of formal tenders and quotes, ensuring they are in line with the SOs and FRs which should be based on the latest version.</p>	<p>a) No formal tenders for new works were initiated in 2023/2024</p>	<p>Both documents need updating, including the new thresholds and the new thresholds need to be inserted into the Standing Orders and Financial Regulations.</p>

<p>expenditure was approved and VAT appropriately accounted for.</p>	<p>b) Ensure that consistent values are in place for the acquisition of formal tenders between SOs and FRs (frequently different limits are recorded in the two documents).</p> <p>c) Review the procedures for receipt of invoices, agreement of invoice detail and confirmation of goods /services delivery and approval for payment: ideally, a suitably designed certification stamp should be in place providing for evidencing of these checks and payment authorisation.</p> <p>d) Check that there is effective segregation between the writing of cheques or the setting up of online payments, and physical release of payments.</p> <p>e) Check that VAT reclaims are prepared and submitted in a timely manner in line with the underlying records and in accordance with current HMRC requirements.</p>	<p>b) Standing Orders and Financial regulations were last updated in February 2023. The values for the formal tenders are different between the standing orders and financial regulations, however, none of the figures are correct.</p> <p>c) Invoices are checked by the clerk to ensure that it represents the item purchased, is arithmetically correct and the goods have been delivered prior to submitting the invoice for approval by the council.</p> <p>d) Although the council operates a Unity Trust Bank account it is only used electronically for standing orders. All other payments are made via cheque with two signatories. Payments are approved at the Parish Council meeting. Although last year's auditor recommended that invoices be signed by two authorised signatories and was to be implemented from May 2023 this remains as not always the case.</p> <p>e) The cashbook shows a VAT reclaim having been made with £2141.95 refunded in May 2023.</p>	<p>From 1 January 2024 they are:</p> <p>Works - £5,372,609 Supply and service – 214,904 Light touch regime contracts for services listed at schedule 3 - £663,540</p> <p>Ensure two authorised signatories initial invoices as well as signing the cheques.</p>
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	<p>f) Where debit / credit cards are in use, establish the total monthly and individual transaction limits and ensure appropriate controls over physical security and usage of the cards are in place.</p>	<p>f) The clerk holds a Santander card via Unity Bank The balance of expenditure on this card is paid monthly as evidenced within the expenditure transaction listing.</p>	
<p>C. This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.</p>	<p>a) Ensure that authorities have prepared, and formally adopted, at least once annually, an appropriate and comprehensive register of assessed risks, both regular and ad hoc.</p> <p>b) Ensure that appropriate levels of insurance cover are in place for land, buildings, public, employers' and hirers' (where applicable) liability, fidelity / employees (including councillors) liability, business interruption and cyber security.</p> <p>c) Ensure that appropriate arrangements are in place for monitoring play areas, open spaces and sports pitches: such reviews should be undertaken by appropriately qualified external inspectors or, if by officers or members, that they have received the appropriate training and accreditation.</p>	<p>a) The council has a risk management register, a risk assessment document, a risk management graph and a risk management policy. They were all reviewed in March 2024 minute 5378.</p> <p>b) The council's insurance was last reviewed in May 2023.</p> <p>Minute 5146 shows that the council signed up to a five-year agreement A copy of the policy was provided and demonstrates the correct level of insurance was in place for the insured period. There is also evidence that the lengthsman's mowing machine was separately insured - minute 5370.</p> <p>c) There are no play areas, open spaces or sports pitches.</p>	

	<p>d) Review the effectiveness of internal control carried out by the authority.</p>	<p>d) A copy of the review of internal control completed in 2023 was provided.</p>	
<p>D. The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.</p>	<p>a) Ensure that the full Authority, not a committee, has considered, approved and adopted the annual precept for the coming year in accordance with the required parent Authority timetable.</p> <p>b) Ensure that current year budget reports are prepared and submitted to Authority/Committees periodically during the year with appropriate commentary on any significant variances.</p> <p>c) Review the budget performance either during the year or at the financial year-end seeking explanations for any significant or unanticipated variances.</p> <p>d) Ensure that the Authority has considered the establishment of specific earmarked reserves and, ideally, reviews them</p>	<p>a) Minute 5382 on 10 January shows full council resolved to precept £84,000 for work carried out in 2024-2025. Minute 5388 on 19 January at an extraordinary meeting of the council resolved to precept for £81,000.</p> <p>b) The council has a finance committee which met in April, August, October 2023 and January 2024 which conducts budget monitoring. A report is prepared from the meeting and submitted to full council. Variances are shown in both percentage and financial terms. Problems at the start of the financial year with the accuracy of reporting staff costs have meant that expenditure is overstated by £47.27. There is a bank reconciliation and Budget monitoring item on each agenda for full council.</p> <p>c) No evidence could be found of discussions of significant unanticipated variances. Expenditure against budget information was provided for year end.</p> <p>d) The council has a reserves policy in which it states that it will accrue reserves for specific items of expenditure.</p>	<p>It is recommended that discussion of variances is documented, along with the decision councillors made in respect of the variance.</p>

	<p>annually as part of the budget assessment process.</p> <p>e) Ensure that the precept received in the accounts matches the prior year submission form to the relevant authority and the <u>public record of precepted amounts</u> .</p>	<p>e) The precept received for 23/24 is shown as £78k in the May minutes at 5276. The January 23 minutes show a precept requested of £81k at 5388.</p>	
<p>E. Expected income was fully received based on correct prices, properly recorded and promptly banked; and VAT appropriately accounted for.</p>	<p>a) Review “Aged debtor” listings to ensure appropriate follow up action is in place.</p> <p>b) Allotments: ensure that appropriate signed tenancy agreements exist, that an appropriate register of tenants is maintained identifying, that debtors are monitored.</p> <p>c) Burials: ensure that a formal burial register is maintained that it is up-to-date and that a sample of interments and memorials are appropriately evidenced, that fees have been charged at the correct approved rate and been recovered within a reasonable time: (Authorities should also acquire and retain copies of Burial / Cremation certificates).</p> <p>d) Hall hire: ensure that an effective diary system for bookings is in place identifying the hirer, hire times and ideally cross-referenced to invoices raised.</p>	<p>a) Not applicable, there are no aged debtors.</p> <p>b) Not applicable as no allotments owned by the council.</p> <p>c) Not applicable, the council does not conduct burials.</p> <p>d) Not applicable, the council does not own a hall.</p>	

	<p>e) Leases: ensure that leases are reviewed in a timely manner in accordance with the terms of the lease and rents similarly reviewed appropriately at the due time.</p> <p>f) Other variable income streams: ensure that appropriate control procedures and documentation are in existence to provide a clear audit trail through to invoicing and recovery of all such income</p> <p>g) Where amounts are receivable on set dates during the year, ensure that an appropriate control record is maintained duly identifying the date(s) on which income is due and actually received / banked</p>	<p>e) Not applicable, the council does not hold any leases.</p> <p>f) Evidence of other variable income streams such as bank interest, PROW money from LCC and grants are documented. The cashbook shows evidence of the various receipts received by account code throughout the year.</p> <p>g) The only set date for receipts is the beginning of April and the receipt of the precept.</p>	
<p>F. Petty Cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT</p>	<p>a) A number of authorities are now running down and closing their petty cash accounts and using debit / credit cards for ad hoc purchases. Consequently, a “Not covered” response is frequently required in this area.</p>	<p>a) Financial Regulation at 6.10 states that the council doesn’t hold petty cash.</p> <p>b) It was noted that two cash donations were received, both in June, one for £100 and the other for £20 in respect of the accounts managed on behalf of In Bloom and the over 60’s tea.</p>	

<p>appropriately accounted for</p>	<p>b) Review the systems in place for controlling any petty cash and also cash floats (used for bar, catering, etc).</p> <p>c) Check a sample of transactions during the financial year to ensure appropriate supporting documentation is held.</p> <p>d) Review the existence of evidenced periodic independent verification of the petty cash and any other cash floats held.</p> <p>e) Ensure that VAT is identified wherever incurred and appropriate.</p> <p>f) Physically check the petty cash and other cash floats held.</p> <p>g) Where bar or catering facilities are in place, ensure that appropriate cashing-up procedures are in place reconciling the physical cash takings to the till "Z" total readings.</p>	<p>c) Not applicable.</p> <p>d) Not applicable.</p> <p>e) Not applicable.</p> <p>f) Not applicable.</p> <p>g) Not applicable.</p>	
<p>G. Salaries to employees and allowances to members were paid in accordance with</p>	<p>a) Ensure that, for all staff, a formal employment contract is in place together with a confirmatory letter setting out any changes to the contract.</p>	<p>a) A copy of the clerk's contract and the lengthsman's contract was seen in April 2024.</p>	

<p>the authority's approvals, and PAYE and NI requirements were properly applied.</p>	<ul style="list-style-type: none"> b) Ensure that appropriate procedures are in place for the payment of members allowances and deduction of any tax liability. c) Ensure that, for a sample of staff salaries, gross pay due is calculated in accordance with the approved spinal point on the NJC scale or hourly rate, if off-scale, and also with the contracted hours. d) Ensure that appropriate tax codes are being applied to each employee. e) Where free or paid for software is used, ensure that it is up to date. f) For the test sample of employees, ensure that tax is calculated appropriately. g) Check the correct treatment of Pension contributions. 	<ul style="list-style-type: none"> b) Not applicable, there are no members allowances. c) The payment of salaries is contracted out to a professional firm of accountants – Towers and Gornall. When council approval is given for any change to pay rate or hours worked, the payroll provider is notified and asked to make the appropriate salary adjustments. A sample check of the annual employee pay details shows that staff are being reimbursed correctly in line with their approved spine point. However, the clerk was overpaid in April, May, June and July. This was raised in last year's audit and stems from the clerk being paid a monthly fixed amount by Standing Order with a balancing payment made by cheque d) Tax codes are received directly by the payroll provider. The employee pay details sheet produced by T&G shows the correct allocation of tax codes. e) The payroll provider's software is regularly updated. f) The payroll provider applies the appropriate tax code in order to ensure that tax is calculated correctly. g) Pension contributions are listed within the payroll provider's report and are calculated in accordance with the instructions of the pension provider. 	
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	<p>h) For NI, ensure that the correct deduction and employer's contributions are applied: NB. The employers allowance is not available to councils but may be used by other authorities.</p> <p>i) Ensure that the correct employers' pension percentage contribution is being applied.</p> <p>j) Ensure that for the test sample, the correct net pay is paid to the employee with tax, NI and pension contributions correctly paid to the respective agencies.</p>	<p>h) The payroll provider ensures that the correct NI deduction and employer's contributions are applied.</p> <p>i) The payroll provider ensures that the correct employer's pension contribution is applied in line with the pension provider's instructions.</p> <p>j) The payroll provider ensures that the correct net pay is paid and identifies the amounts due to the respective agencies (HMRC and Lancashire Pension Service). A report is issued to the council for pre-payment approval at each meeting. This ensures a clear audit trail from provision of payment information to decision to pay to payment of salaries and other monies due.</p> <p>As PAYE and pensions are managed by Towers and Gornall the assumption has been made that they will have ensured that all payments are calculated correctly and that they have procedures in place to check the accuracy of the calculations they make.</p>	
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<p>H. Asset and investment</p>	<p>Tangible fixed assets</p> <p>a) Ensure that the Authority is maintaining a formal asset register</p>		
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<p>Tangible Fixed Assets:</p> <p>registers were complete and accurate and properly maintained.</p> <p>This section/ assurance should be extended to include loans to or by the authority</p>	<p>and updating it routinely to record new assets at historic cost price, net of VAT and removing any disposed of / no longer serviceable assets.</p> <p>b) Physically verifying the existence and condition of high value, high risk assets may be appropriate. Ideally, the register should identify for each asset the purchase cost and, if practicable, the replacement / insured cost, the latter being updated annually and used to assist in forward planning for asset replacement.</p> <p>c) Additions and disposals records should allow tracking from the prior year to the current</p> <p>d) Ensure that the asset value to be reported in the AGAR at section 2, line 9 equates to the prior year reported value, adjusted for the nominal value of any new acquisitions and / or disposals.</p> <p>e) Compare the asset register with the insurance schedule to ensure that all assets as recorded are</p>	<p>a) The council is maintaining a formal asset register and it is updated routinely. It shows both purchase price and replacement value.</p> <p>b) The register records items with their purchase cost, and replacement value. The latest version is dated March 2024, however there is nothing in the March minutes to suggest this has been signed off by full council. It is not clear whether there is an annual formal valuation of replacement/insured cost.</p> <p>There is no evidence of a method of asset valuation policy having been created as specified in last year's audit in accordance with Para5.63 of the 2023 JPAG. There are no assets that could be considered as high value, high risk.</p> <p>c) Additions and disposals are shown in red.</p> <p>d) The value of assets tallied with the prior year value and was adjusted as required.</p>	
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	<p>appropriately insured or “self-insured” by the Authority</p> <p>Fixed asset investments:</p> <p>f) Ensure that all long-term investments (i.e., those for more than 12 month terms) are covered by the “Investment Strategy” and reported as Assets in the AGAR at section 2, line 9.</p> <p>Borrowing and Lending:</p> <p>g) Ensure that the authority has sought and obtained appropriate DMO approval for all loans acquired.</p> <p>h) Ensured that the authority has accounted for the loan appropriately (i.e., recorded the full value of the loan. Any arrangement fee should be regarded as an admin expense) in the year of receipt.</p> <p>i) Ensure that the combined principal loan repayment and interest for the year is correctly recorded in the AGAR at section 2 line 5.</p>	<p>e) The council’s insurance is scheduled to be renewed in June. Assets in the asset register are specified in the insurance policy.</p> <p>f) The council does not hold any investments that cannot be accessed within a 12 month period. There is an outstanding loan to Pilling Memorial Hall of £44,800 which is reported in the Asset register.</p> <p>g) No loans were acquired.</p> <p>h) Not applicable - see above.</p> <p>i) Not applicable - see above.</p>	
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	<p>j) Ensure that the outstanding loan liability as at 31st March each year is correctly recorded in the AGAR at section 2, line 10 (value should be verified via the DMO website).</p> <p>k) Where the Authority has issued loans to local bodies, they should ideally seek signed indemnities from the recipient body, or their members, agreeing to underwrite the loan debt.</p>	<p>j) Not applicable - see above.</p> <p>k) There is a loan to Pilling Memorial Hall of which £44,800 is outstanding. No indemnities were sought from the recipient body or its member to underwrite the loan debt. Last year's auditor recommended that non-repayment of the loan be added as a risk to the Council's risk register. This has not been done.</p>	<p>It is once again recommended that the unsecured nature of this loan which equates to over half of the council's precept is flagged as a risk.</p>
<p>J. Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cashbook, supported by an adequate audit trail from underlying records and, where appropriate, debtors and</p>	<p>Whilst IAs are not required to verify the accuracy of detail to be disclosed in the AGAR, this assertion, together with the expectation of most Authorities, effectively requires IAs to ensure that the financial detail reported at section 2 of the AGAR reflects the detail in the accounting records maintained for the financial year. Consequently, IAs should</p> <p>a) Ensure that, where annual turnover exceeds £200,000, appropriate records are maintained throughout the year on an Income and Expenditure basis to facilitate budget reporting in that vein.</p> <p>b) Ensure that appropriate accounting arrangements are in place to account for debtors and</p>	<p>a) Not applicable.</p> <p>b) The correct accounting basis (receipts and payments) was used</p>	

creditors were properly recorded.	creditors during the year and at the financial year-end.		
K. If the authority certified itself as exempt from a limited assurance review in the prior year, it met the exemption criteria and correctly declared itself exempt.	<ul style="list-style-type: none"> a) IAs should ensure that, all relevant criteria are met (receipts and payments each totalled less than £25,000) . b) the correct exemption certificate was prepared and minuted in accordance with the statutory submission deadline. c) that it has been published, together with all required information on the Authority's website and noticeboard. 	<ul style="list-style-type: none"> a) Not applicable. The Parish Council did not certify itself as exempt. b) Not applicable. c) Not applicable. 	
L. The authority publishes information on a free to access website / web page, up to date at the time of the internal audit in accordance with the relevant legislation	<ul style="list-style-type: none"> a) IAs should review the Authority's website ensuring that all required documentation is published in accordance with the relevant legislation. 	<ul style="list-style-type: none"> a) As the Parish Council is above the threshold for smaller authorities and below the threshold for larger authorities there is no requirement to publish data. The council's website Catterallparish.org contains a number of documents, including agendas, minutes, AGAR, public rights notices and associated audit documents. In addition, it posts Standing Orders, Financial Regulations and other council policies and procedures. 	
M. The authority, during the previous year, correctly provided for the period for	<ul style="list-style-type: none"> a) IAs should acquire / examine a copy of the required "Public Notice" ensuring that it clearly identifies the statutory 30 working day period when the Authority's 	<ul style="list-style-type: none"> a) The Public Rights notice for the 22/23 financial year published on the council's website shows an inspection period of Monday 5 June to Friday 14 July. 	

<p>the exercise of public rights as required by the Accounts and Audit Regulations.</p>	<p>records are available for public inspection.</p> <p>b) IAs may also check whether councils have minuted the relevant dates at the same time as approving the AGAR</p>	<p>b) Minute 5305 shows that notification of public rights was minuted at the same time as approving the AGAR.</p>	
<p>N. The authority complied with the publication requirements for the prior year AGAR.</p>	<p>a) IAs should ensure that the statutory disclosure / publication requirements in relation to the prior year's AGAR have been met as detailed on the front page of the current year's AGAR.</p>	<p>a) Section 1 - Annual Governance Statement 2022/23, approved and signed at minute 5305 Section 2 - Accounting Statements 2022/23, approved and signed at minute 5305</p> <p>The statements were not signed until after the inspection period had started, thereby contravening Regulation 15 of the Accounts and Audit Regulation 2015.</p> <p>The Parish Council made to reference to the fact that it should</p> <p>Not later than 30 September 2023 authorities must publish:</p> <ul style="list-style-type: none"> • Notice of conclusion of audit • Section 3 - External Auditor Report and Certificate • Sections 1 and 2 of AGAR including any amendments as a result of the limited assurance review. <p>Ensure sections 1,2 and 3 of the published AGAR remain available for a period of not less than 5 years from the date of publication.</p>	<p>Although two resolutions were made regarding the signing of sections 1 and 2 it is recommended that these are annotated separately i.e 5305(a) 5305(b)</p> <p>It is recommended that the requirements are minuted once the Notice of Conclusion of Audit is received by the council.</p> <p>As per the document on the council's website it is noted that the conclusion of Audit info was not published until 27 September 2023.</p> <p>The AGAR for 22/23 has not been published on the council's website.</p>

<p>O. Trust funds (including charitable) - the Council met its responsibilities as a trustee</p>	<p>a) ● Confirm that all charities of which the council is a Trustee are up to date with CC filing requirements</p> <p>b) ● that the council is the sole trustee on the Charity Commission register</p> <p>c) ● that the council is acting in accordance with the Trust deed</p> <p>d) ● that the Charity meetings and accounts recorded separately from those of the council</p> <p>e) ● review the level and activity of the charity and where a risk based approach suggests such, review the Independent Examiners report</p>	<p>a) This section is not applicable as Pilling Parish Council is not a trustee.</p>	
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1. *In Bloom arrangements

It is noted that arrangements between the council and the In Bloomers in 2023/4 are now more clearly defined with the correct submission of invoices and receipts that only include items purchased for In Bloom purposes.

2. Risk register @ 4.1 refers to Catterall.

3. July published minutes after page 1 state that they relate to August.

4. The Lengthsman's toil is incorrectly calculated from 22 January 2024.

5. Section 1 of AGAR no.4 – tick 'No'

6. Some of the recommendations made at 'A' have now been addressed by the clerk in order to arrive at the correct figures within the Staff Costs, Other payments and Fixed Assets boxes in Section 2 of the AGAR. It is still recommended that the council looks at its method of recording finances and takes advantage of the numerous options available to it through the use of an accounting software package and improved use of its banking system.