

Claire Dornan
Downham Market Town Council
Town Hall
6 Market Place
Downham Market
Norfolk
PE38 9DE

11th June 2026

Dear Claire

**Re: Downham Market Town Council
Internal audit for year ending 31st March 2026 – Final Audit report**

Executive summary

Following completion of my visits to Downham Market on 23rd October 2025 and 2nd June 2026 plus additional checking of website and documents, I enclose my final audit report for your attention and presentation to the Council. The audit was conducted in accordance with current practices and guidelines. Whilst I have not tested all transactions, my samples have where appropriate covered the entire year.

My report is presented in the same order as the assertions on the internal auditor report within the published AGAR. The start of each section details the nature of the assertion to be verified. The report concludes with an opinion as to whether each assertion has been met or not at the audit. Where appropriate, recommendations for action are shown in bold text and are summarised in the table at the end of the report.

My sample testing did not uncover any errors or misstatements that require reporting to the external auditor at this time; however I am concerned that some meetings are going into closed session when what is being discussed is not confidential and, in addition, the Council are acting against the advice of the Clerk on this matter (for example, extraordinary meeting of Full Council, 1st April 2026).

It is also concerning that some meetings are being clerked by councillors rather than the Clerk or Deputy Clerk (for example, Human Resources Committee, 19th February 2026). I

have not been provided with a satisfactory explanation for this. I also note that there are no publicly available minutes of the meeting of the HR Committee on 20th March 2026.

Regarding contracts, whilst there is nothing, *per se*, to stop a councillor being awarded a contract with their own council, it is concerning that when the awarding of one contract was discussed, the committee made the decision to go into closed session. Furthermore, there was nothing on the agenda to indicate that such a vote would take place. This should not be happening.

Regulation

The Accounts and Audit Regulations 2015 require smaller authorities, each financial year, to conduct a review of the effectiveness of the system of internal control and prepare an annual governance statement in accordance with proper practices in relation to accounts. In addition to this, a smaller authority is required by Regulation 5(1) of the Accounts and Audit Regulations 2015 to “undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.”

Internal auditing is an independent, objective assurance activity designed to improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The purpose of internal audit is to review and report to the authority on whether its systems of financial and other internal controls over its activities and operating procedures are effective.

The function of the internal audit is to test and report to the authority on whether its specific system of internal control is adequate and working satisfactorily. The internal audit reports should therefore be made available to all members of Downham Market Town Council to support and inform them when they are considering the authority’s approval of the annual governance statement.

Independence and competence

Your audit was conducted by J. Miller. I confirm that the internal auditor is independent from the management of the financial controls and procedures of the Council and that the internal auditor does not have any conflicts of interest with the audit client, nor do they provide any management or financial assistance to the client.

Your auditor is CiLCA-qualified and a chartered management accountant.

Planning and inherent risk assessment

My work will address each of the internal control objectives as stated on the Annual Internal Audit Report of the AGAR. As part of the inherent risk assessment, I have concluded that:

- There have been no reported instances of serious breaches of regulations in the past

- The client uses an industry approved financial reporting package
- The client regularly carries out reconciliations and documents these
- There is regular reporting to Council
- The management team are experienced and informed
- Records are neatly maintained and referenced
- The client is aware of current regulations and practices
- There has been no instance of high staff turnover, though it is noted that the Deputy Clerk is retiring.

It is my opinion that the inherent risk of error or misstatement is low. Testing to be carried out will be “walk through testing” on sample data to encompass the period of the Council year 2025-26.

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This report has been prepared for the sole use of Downham Market Town Council. To the fullest extent permitted by law, no responsibility or liability is accepted by the internal auditor to any third party who purports to use or rely on, for any reason whatsoever, this report, its content or conclusions.

A. APPROPRIATE ACCOUNTING RECORDS HAVE BEEN KEPT

Internal audit requirement

Appropriate accounting records have been properly kept throughout the financial year.

Audit findings

The interim audit was conducted on site with the Clerk, who also acts as the Council's Responsible Financial Officer (RFO), plus the Administrator. The staff listed had prepared some of the information advised in advance of the visit, and I have the impression that accounting records are neatly maintained and easily accessible. Other information was reviewed through discussion with the Clerk and the Administrator and a review of the Council website (www.downhammarkettowncouncil.org.uk).

The Council uses Scribe accounting software for recording the day-to-day financial transactions of the Council. This is an industry specific package and we make no recommendation to change. The system is used regularly to record transactions and produce management information reports for review at Council and committee meetings.

Agendas, reports and minutes for meetings are clear and concise, and in general decisions are clearly recorded. There is evidence of sufficient information being provided to councillors to allow them to make informed financial decisions.

B. FINANCIAL REGULATIONS, GOVERNANCE AND PAYMENTS

Internal audit requirement

This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for.

Audit findings

Check the publication and minuting of the prior year audited AGAR and notice of conclusion of audit.

The section 2 "External auditor's limited assurance opinion" of the external auditor's report for 2024-25 it states "Information has come to our attention from the internal auditor highlighting the fact that the notice of conclusion of audit was not published on the authority's website by the dates specified in the Accounts and Audit Regulations 2015. This is consistent with the Internal Auditor's response to Internal Control Objective N."

In the section Other matters not affecting our opinion which we draw to the attention of the authority that "The smaller authority has confirmed that it has not complied with the governance Assertions in Section 1, Boxes 1 and 2, but it has provided the appointed auditor with an adequate explanation for non-compliance and details of the actions necessary to address weaknesses identified. This is consistent with the Internal Auditor's response to Internal Control Objective B."

The external auditor's report was presented to full Council at the meeting on 13th January 2026.

I note that internal audit reports are also published on the Council website.

Confirm by sample testing that councillors sign statutory office forms

I confirmed by sample testing that councillors sign "Acceptance of Office" forms. The Council website provides details of councillors and includes a link to the Kings Lynn and West Norfolk Borough Council website page with each of their Register of Interests Forms.

Confirm that the council is compliant with the relevant transparency code

As the Council's income and expenditure exceeds £25,000, it is not a statutory requirement to follow the requirements of the Local Government Transparency Code, although it is recommended best practice to do so

Confirm that the council is compliant with GDPR

Councillor e-mail addresses on the Downham Market TC website are all official TC e-mail addresses.

The Council has a Privacy Notice on the home page of its website and there is a website accessibility policy on the website.

Confirm that the council meets regularly throughout the year.

In addition to full Council, the Council has a committee structure to deal with business. A future meeting diary is available on the Council website, along with historic minutes. Agendas for meetings are kept on the website after meetings so that they can be compared to the minutes.

Check that agendas for meetings are published giving 3 clear days' notice.

I was able to test that at least 3 clear days' notice is given on agendas. Whilst we have not tested every single committee and Council meeting there was no evidence of non-compliance in giving three clear days' notice of the meeting. I note that reports are published for meetings containing supporting non-confidential background information on agenda items. This conforms with the requirements of the Information Commissioner's Office (ICO).

Check the draft minutes of the last meeting(s) are on the Council's website.

Draft minutes are uploaded to the Council website and clearly marked as unconfirmed until adoption at the next meeting.

Confirm that the Parish Council's Standing Orders have been reviewed within the last 12 months.

The Standing Orders based on the current NALC model were reviewed and adopted at the January 2025 meeting but amended on 1st April 2025. They have not been reviewed since January 2025.

Confirm that the Parish Council has adopted and recently reviewed Financial Regulations.

The Financial Regulations based on the current NALC model were reviewed and adopted at the January 2025 meeting but amended on 1st April 2025. They have not been reviewed since January 2025.

Check that the council's Financial Regulations are being routinely followed.

The Council has thresholds in place at which authorisations to spend must be obtained as below:

FR 4.1 Expenditure on revenue items may be authorised up to the amounts included for that class of expenditure in the approved budget. The authority to amend an approved budget is to be determined by

- the Council for all items over £5,000.
- the Clerk, in conjunction with three councillors, for items between £500 and £5000
- the Clerk for authorised expenditure up to £500

Such authority is evidenced by a purchase order signed by the Clerk and where necessary also by the appropriate Councillors.

Contracts may not be disaggregated to avoid controls imposed by these regulations.

Based on the level of financial activity of the Council, these authorisation thresholds appear reasonable.

FR 6.4 Cheques or orders for payment drawn on the bank account in accordance with the schedule as presented to council or committee shall be signed by two authorised members of council, and countersigned by an Officer, in accordance with a resolution instructing that payment.

Payments are set up by the Clerk and authorised by two councillors individually and independently of each other.

At the interim internal audit, I tested a random sample of twenty five invoices with a total value of £59,078.30 including VAT. All of these were found to have been approved at full council meetings, recorded in the minutes, and payment lists initialled and dated.

Later in the financial year, I sampled a further forty seven invoices with a total value of £63,565.31 including VAT. All invoices were on payments lists presented at DMTC meetings and the lists were signed and dated. One of the invoices was inputted incorrectly with regard to VAT so I tested a further sample of twelve invoices from throughout the year with a total value of £2,852.25 including VAT. All of these were found to have been approved at full council meetings, recorded in the minutes, and payment lists initialled and dated. Furthermore, they were all inputted correctly on Scribe. The invoice which was inputted incorrectly has now been re-inputted onto Scribe. I am satisfied, based on my additional sampling, that this was an exception.

Councillors should be sent a payments list at least three days before any meeting at which payments are to be approved.

I reviewed the nominal ledger report for the current financial year. In general, sufficient narrative is provided for entries to adequately identify their source, and amounts appear to have been allocated to the correct nominal codes. Sometimes a bit more narrative would be useful. There is no evidence of deliberately 'netting-off' of income against expenditure, and the information reviewed points to a satisfactory system.

Confirm all section 137 expenditure meets the guidelines and does not exceed the annual per elector limit of £11.10 per elector.

The Council has General Power of Competence.

Check receipt of VAT refund matches last submitted VAT return.

The Council submits its VAT return on a quarterly basis. The most recent submission when visiting DMTC in October 2025 was for the period 1st July to 30th September 2025 inclusive and showed a refund amount due of £3,868.33. The refund entered the DMTC bank account on 15th October 2025.

When I visited in June 2026, I checked the VAT return for Q4 of the financial year ending March 2026. A return had been made with £8,237.19 to be refunded. The refund was received on 7th May 2026.

Confirm that checks of the accounts are made by a councillor.

I saw evidence of a review of financial performance against budget at the meeting on 3rd June 2025; however, **the verification by a member could be made more explicit in the**

minutes.

In August 2025 and October 2025, review of financial performance against budget was undertaken at the Governance & Finance meetings. The review was minuted in some detail.

C. RISK MANAGEMENT AND INSURANCE

Internal audit requirement.

This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.

Audit findings.

The Council has an adopted Risk register which was last reviewed and updated on 18th March 2025. This should be reviewed at least once a year, and more if there are any significant changes.

I confirmed that the Council has a valid insurance policy in place with Aviva which was renewed on 7th July 2025. The policy includes Public Liability cover of £10 million and Employers Liability cover of £10 million.

I recommend that DMTC ensures that it continues governance sampling at least monthly to ensure that risks are kept to a minimum.

D. BUDGET, PRECEPT AND RESERVES

Internal audit requirement

The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.

Audit findings

At the January 2025 meeting, the precept was set at £646,003.74 for 2025-26. The precept amount was stated in the minutes of the meeting.

At an extraordinary meeting of Full Council in January 2026, the precept was set at £664,147. The precept demand is publicised on the DMTC website.

There is evidence within the minutes of meetings that detailed financial information is presented to appropriate meetings, and this would appear to support councillors in making informed decisions.

The Joint Panel on Accountability and Governance (JPAG) Practitioner's guide states 'the generally accepted recommendation with regard to the appropriate minimum level of a smaller authority's general reserve is that this should be maintained at between three and twelve months of net revenue expenditure' (para 5.33).

Looking at the cash position of the Council at the time of the audit, I am satisfied that the Council has enough reserves to meet its financial obligations.

E. INCOME

Internal audit requirement

Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.

Audit findings

Apart from the precept, the Council budgets to receive income from other sources such as the market and the renting of property. The precept is the largest income for Downham Market TC for the year 2025-26.

From my review of the Scribe records, income is recorded with sufficient narrative to clearly identify the source, and appears to be posted to the correct nominal codes. As mentioned earlier, I did find that one invoice incorrectly allocated VAT when, in fact, there was none. This was brought to the attention of DMTC who corrected it. As a result of finding this invoice, I sampled a further twelve invoices and found them all to have VAT correctly allocated. I am satisfied that this was a very rare exception rather than the rule.

F. PETTY CASH

Internal audit requirement

Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for.

Audit findings

Petty cash is not used at Downham Market Town Council.

G. PAYROLL

Internal audit requirement

Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.

Audit findings

Payroll services are carried out internally, and Downham Market Town Council makes the BACS payments for salaries and to the HMRC and the pension provider. There are eight members of staff at Downham Market TC, seven full-time and one part-time.

I reviewed the salaries file and was able to confirm that based on the tax code information on the pay slips, the deducted amounts appear correct.

I remind the Clerk that only salary, HMRC and pension payments should be included in box 4 on the Annual Governance and Accountability Return (AGAR) and any other staff costs should be recorded in box 6.

H. ASSETS AND INVESTMENTS

Internal audit requirement

Asset and investments registers were complete and accurate and properly maintained.

Audit findings

DMTC has a detailed fixed asset register which lists assets as well as disposals. The latest fixed asset register on DMTC's website is from 2023. It would be useful to have a more up-to-date register online, even if abridged.

The Council has four PWLB loans and these are adequately kept track of using a combination of the accounts and PWLB statements. At the year end, the outstanding balance on these loans totalled £91,000.

I. BANK AND CASH

Internal audit requirement

Periodic and year-end bank account reconciliations were properly carried out.

Audit findings

The process for bank reconciliations is contained within the council's adopted Financial Regulations.

FR 2.2 states 'On a regular basis, at least once in each quarter, and at each financial year end, a member other than a cheque signatory shall be appointed to verify bank reconciliations (for all accounts) produced by the RFO. The member shall sign the

reconciliations and the original bank statements (or similar document) as evidence of verification.

In the interim audit, I noted that reconciliations had been undertaken during the year and approved both at Full Council and at the Governance & Finance committee meetings. I noted that, at the Governance & Finance committee meeting of 12th November, it was agreed that bank reconciliations and Quarterly Reports would be presented at Full Council in future.

At the April 2026 meeting of Full Council, the bank reconciliation for the end of the year was signed by the Mayor.

J. YEAR END ACCOUNTS

Internal audit requirement

Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.

Audit findings

I can confirm that Downham Market TC are using the correct accounting basis (income & expenditure method) for their accounts.

K. LIMITED ASSURANCE REVIEW

Internal audit requirement

Not relevant.

Audit findings

Not relevant.

L: TRANSPARENCY

Internal audit requirement

If the authority has an annual turnover not exceeding £25,000, it publishes information on a website / webpage up to date at the time of the internal audit in accordance with the Transparency Code for Smaller Authorities

Audit findings

Though Downham Market TC is above the threshold, it recognises the importance of openness and transparency and consequently publishes information accordingly.

M: EXERCISE OF PUBLIC RIGHTS - INSPECTION OF ACCOUNTS

Internal audit requirement

The authority has demonstrated that during summer 2025 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations.

Audit findings

Inspection – key dates	2024-25 Actual
Date AGAR signed by Council	17 June 2025
Date inspection notice issued	24 June 2025
Inspection period begins	1 July 2025
Inspection period ends	11 August 2025
Correct length (30 working days)	Yes
Common period included (first 10 working days of July)	Yes

I am satisfied the requirements of this control objective were met for 2024-25, and assertion 4 on the Annual Governance Statement can therefore be signed off by the Council.

N: PUBLICATION REQUIREMENTS

Internal audit requirement

The authority has complied with the publication requirements for 2024-25. Under the Accounts and Audit Regulations 2015, authorities must publish the following information on the authority website / webpage.

Before 1 July 2025 authorities must publish:

- Notice of the period for the exercise of public rights and a declaration that the accounting statements are as yet unaudited
- Section 1 - Annual Governance Statement 2024-25, approved and signed, page 4
- Section 2 - Accounting Statements 2024-25, approved and signed, page 5

Not later than 30 September 2025 authorities must publish:

- 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.

It is recommended as best practice, to avoid any potential confusion by local electors and interested parties, that you also publish the Annual Internal Audit Report, page 3.

Audit findings

I was able to confirm that the Notice of Public Rights is published on the Council website. I was also able to confirm that the Notice of Conclusion of Audit was posted online before 30th September 2025.

O. TRUSTEESHIP

Internal audit requirement

Trust funds (including charitable) – The council met its responsibilities as a trustee.

Audit findings

At the year end, the Council had one trust, namely the Howdale Community Association (HCA). I have seen confirmation from the Charity Commission that this trust has since been closed.

Achievement of control assertions at interim audit date

Based on the tests conducted during the interim audit, our conclusions on the achievement of the internal control objectives are summarised in the table below. A further review and update of this opinion will be conducted at the final audit.

	INTERNAL CONTROL OBJECTIVE	Yes	No	Not covered
A	Appropriate accounting records have been properly kept throughout the financial year	Y		
B	This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for.		N	
C	This authority assesses the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.		N	
D	The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	Y		
E	Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	Y		
F	Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for.			N/A
G	Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	Y		
H	Asset and investments registers were complete and accurate and properly maintained.	Y		
I	Periodic bank account reconciliations were properly carried out during the year.	Y		
J	Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	Y		
K	If the authority certified itself as exempt from a limited assurance review in 2024-25, it met the exemption criteria and correctly declared itself exempt. (If the authority had a limited assurance review of its 2024-25 AGAR tick "not covered")			N/A
L	The authority publishes information on a free to access website/webpage up to date at the time of the internal audit in accordance with any relevant transparency code requirements.	Y		
M	The authority, during the previous year (2024-25) correctly provided for the period for the exercise of public rights as required by the Accounts and Audit Regulations (evidenced by the notice published on the website and/or authority approved minutes confirming the dates set).	Y		
N	The authority has complied with the publication requirements for 2024-25 AGAR.	Y		
O	Trust funds (including charitable) – The council met its responsibilities as a trustee.	Y		

Should you have any queries please do not hesitate to contact me.

Yours sincerely

J. Miller

Audit Point	Audit Findings	Council comments
Openness of meetings	As far as possible, meetings should be open to the public. I noted unnecessary closing of meetings, despite advice against doing this from the Clerk. It is also noted that at least one meeting was closed without the closing of the meeting being on the agenda.	
Councillors undertaking clerking	It is noted that some meetings appear to have been clerked by councillors rather than professional clerks. If a professional clerk is not present, there is a substantial risk that a council will not follow appropriate practices.	
Review and updating of Financial Regulations, Standing Orders, and Risk Schedule.	The Financial Regulations, Standing Orders, and Risk Schedule have not been properly reviewed or updated in the last year.	
Asset register	The most up-to-date asset register should be on the DMTC website.	