

Response on the 19 objections to the AGAR 2023-24

From: SBA <SBA@pkf-l.com>

Sent: 02 April 2025 16:22

Cc: clerk@hartlebury-pc.gov.uk

Subject: RE: HARTLEBURY PARISH COUNCIL - OBJECTIONS TO 2023/24 AGAR - ACCEPTANCE DECISIONS - STEP 2

Copied to the Council for information

Dear *****

Further to our previous correspondence regarding your objections to the 2023/24 Annual Governance and Accountability Return (AGAR), we are writing to you in accordance with our responsibilities under the Code of Audit Practice as issued by the National Audit Office (NAO) to inform you which of the objections that we deemed to be eligible we have decided to accept for further consideration.

Factors taken into account in deciding whether to consider objections

Section 27(3) of the Local Audit and Accountability Act 2014 (the 2014 Act) requires that we decide whether to consider an objection. Section 27(4) of the 2014 Act provides that we may decide not to consider an objection if, in particular, we think that:

- the objection is frivolous or vexatious;
- the cost of the auditor considering the objection would be disproportionate to the sums to which the objection relates, or;
- the objection repeats an objection already considered by an auditor of the Council's accounts.

By virtue of section 27(5) of the 2014 Act, we are not entitled to refuse to consider an objection which we think might disclose serious concerns about how the relevant authority is managed or led.

By virtue of section 27(6) of the 2014 Act, if we decide not to consider an objection, we may recommend that the Council should instead take action in response to the objection.

Section 28 of the 2014 Act gives a person who has objected to the Council's accounts asking that the auditor make an application for a declaration that an item of account is contrary to law and who is aggrieved that the auditor decides not to do so:

- the right to receive written reasons for that decision; and
- the right to appeal against that decision to the court.

Paragraphs 33 to 44 of the NAO Auditor Guidance Note 04 (AGN 04) provide guidance on deciding whether to consider objections at Step 2 of the objection process. Paragraph 37 emphasises that the grounds set out in section 27(3) of the 2014 Act do not constitute an exhaustive list. Please note that there is no right of appeal against a decision not to issue a public interest report in respect of any of the objections.

We have carefully considered the objections you have made and decided which objections we will consider, in particular by reference to the matters detailed in section 27(4) of the 2014 Act. We would emphasise that in so doing we have:

- considered both the likely individual and aggregate cost of consideration of objections and the sums to which the objections relate in the context of the scale of the Council's activities; and
- had regard to the fact that, under section 27(7) of the 2014 Act, our reasonable costs of considering objections fall on the Council.

In this email we:

- set out the objections that we have decided to consider; and
- set out any objection that we have decided not to consider and the reasons for that decision; and
- request that the Council provides us with its formal response to each accepted objection including supporting evidence as appropriate. (NB: if approval of the formal response is carried out in a public session, the objector's identity must be protected)

Your eligible objections

You have raised nineteen matters in respect of the 2023/24 AGAR that we have previously deemed to be eligible objections. You have objected to:

1. the omission of assets from the value of fixed assets stated in Section 2, Box 9 of the 2023/24 AGAR (Assertion 1 and Box 9);
2. the failure of the Council to complete and submit a VAT return for the 2022/23 year end during 2023/24 (Assertion 1);
3. the failure of the Council to maintain access to HMRC PAYE/NI records and make all the required payments during the year (Assertions 2 and 3);

4. the failure to follow financial regulations in respect of operating a purchase ordering system during the year (Assertion 2);
5. matters in relation to CIL funds:
 - a. the failure to consider the need to return any unspent CIL funds and the impact this could have on the Council's budget and finances (Assertions 1 and 5)
 - c. failure to publish CIL receipts and expenditure during the year on the Council's website (Assertion 3)
6. the failure of the Council to follow financial regulations in respect of budget monitoring reports and explanation of budget variances during the year in the form of a budget v actual comparison (Assertion 2);
7. the failure of the Council to set aside a 'sinking fund' of £1,450 in the earmarked reserves in accordance with the conditions of a grant (Assertion 1 and Box 7);
8. the response given to Assertion 8 of the 2023/24 AGAR due to the failure of the Council to consider the financial and reputational impact of the two legal cases (Assertion 8)
10. the incorrect categorisation of contractor costs as staff costs (Box 4) on the 2023/24 AGAR (Assertion 1, Boxes 4 and 6);
12. the response given to Assertion 1 of the 2023/24 AGAR for the following reasons (Assertion 1):
 - a. the 2024/25 budget setting process did not consider earmarked reserves
 - b. the 2024/25 budget setting process did not include a review of the 2023/24 budget and spending.
 - c. the failure to consider the level of general reserves when setting the budget for 2024/25
 - d. failure to consider the potential impact on the budget of the outcome of a legal case brought against the Council
 - e. failure to consider a 3 year forecast when preparing the budget for 2024/25
 - f. failure to approve earmarked reserves during 2023/24.
13. expenditure incurred of £2,750 for the provision of a maintenance employee (now noted to be a contractor), which was not minuted, nor has a contract been seen (Assertion 2, Boxes 4 and 6);

14. Expenditure of £685 paid in settlement of the hall patio doors which should have been approved for payment from an earmarked reserve (Assertion 2); and
15. The failure to follow financial regulations during the year in relation to the preparation and review of monthly bank reconciliations (Assertion 2)

Step 2 – acceptance decisions

None of the eligible objections have been accepted under Step 2 of AGN 04 for the reasons set out below:

Objection 1: You object to the omission of assets from the value of fixed assets stated in Section 2, Box 9 of the 2023/24 AGAR.

Findings: We note that since this objection was raised the Council has responded to you to indicate that the bricks were not classified as an asset and the bus shelter would be included in the 2024/25 AGAR. We also note that the Council responded ‘No’ to Assertion 1 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year. We have reviewed the asset register on the Council’s website dated February 2025 and note that the bus shelter has been included at a value of £3,000. In our view, the Council has recognised and addressed the issues raised with us in your objection.

We are minded to raise a reporting matter concerning this issue in our external auditor report on the 2023/24 AGAR.

Conclusion: We do not accept this objection for further consideration since the relevant action has now been taken by the Council.

Objection 2: You object to the failure of the Council to complete and submit a VAT return for the 2022/23 year end during 2023/24.

Findings: We note that since this objection was raised the Council has responded to you to indicate that the Council planned to reclaim VAT relating to the three years that had not previously been reclaimed. We note that the Council received a VAT refund in November 2024 and assume that the VAT reclaim process is now up to date. We also note that the Council responded ‘No’ to Assertion 1 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year. In our view, the Council has recognised and addressed the issues raised with us in your objection.

Conclusion: We do not accept this objection for further consideration since the relevant action has now been taken by the Council.

Objection 3: You object to the failure of the Council to maintain access to HMRC PAYE/NI records and make all the required payments during the year.

Findings: We note that since this objection was raised the Council has paid the arrears relating to the former clerk to HMRC. We also note that the Council responded 'No' to Assertions 2 and 3 on the 2023/24 AGAR, recognising that it did not have effective internal controls and could not respond positively that all laws and regulations had been complied with throughout the whole of the 2023/24 financial year. In our view, the Council has recognised and addressed the issues raised with us in your objection.

Conclusion: We do not accept this objection for further consideration since the relevant action has now been taken by the Council.

Objection 4: You object to the failure to follow financial regulations in respect of operating a purchase ordering system during the year.

Findings: We note that since this objection was raised the Council has responded to you to indicate that the Council planned to update its financial regulations to remove reference to the order book, that was not used during 2023/24. We also note that the Council responded 'No' to Assertion 2 on the 2023/24 AGAR, recognising that it did not have effective internal controls throughout the whole of the 2023/24 financial year. In our view, the Council has recognised the issues raised with us in your objection; however, it has not yet addressed them and so must respond 'No' to Assertion 2 on the 2024/25 AGAR, as the Council's financial regulations have not yet been updated and its standing order state that the financial regulations should be reviewed and updated annually.

We are minded to raise a reporting matter concerning this issue in our external auditor report on the 2023/24 AGAR.

Conclusion: We do not accept this objection for further consideration since the Council correctly responded 'No' to Assertion 2.

Objections 5a and c: You object to the failure to consider the need to return any unspent community infrastructure levy (CIL) funds, the impact this could have on the Council's budget and finances and the failure to publish CIL receipts and expenditure during the year on the Council's website.

Findings: We note that since these objections were raised the Council has responded to you to indicate that the Council did account for its CIL funds as restricted, i.e. they are held in an earmarked reserve and not part of the Council's general reserves. We note

from the Council's website that the Council's restricted fund accounting for 2024/25 includes the CIL funds. In our view, this does not impact on the Council's response to Assertion 5 as you have alleged; since that governance assertion concerns the annual process of review of the Council's risk management documentation and not the quality of its content.

We note from the Council's website that it did receive CIL neighbourhood funds during 2023/24; however, we cannot see a report on its website regarding the income and any related expenditure during the year as is required. For each year when it has received neighbourhood funds through the levy, the Council must publish the information specified in the CIL Regulations. It should publish this information on the website. If it hasn't received any money it does not have to publish a report, but may want to publish some information to this effect in the interests of transparency.

We also note that the Council responded 'No' to Assertions 1 and 3 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year and could not respond positively that all laws and regulations had been complied with throughout the whole of the 2023/24 financial year. In our view, the Council has recognised and addressed the issues raised with us in your objections.

Conclusion: We do not accept these objections for further consideration since the relevant action has now been taken by the Council.

Objection 6: You object to the failure of the Council to follow financial regulations in respect of budget monitoring reports and explanation of budget variances during the year in the form of a budget v actual comparison.

Findings: We note that regular budget monitoring by full Council is a mandatory requirement of paragraph 1.8 of the Practitioners' Guide (Assertion 1) and a requirement of paragraph 4.7 of the Council's financial regulations (Assertion 2).

We have not seen evidence that these regular reviews were undertaken by the Council during 2023/24.

We also note that the Council responded 'No' to Assertions 1 and 2 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year and that it did not have effective internal controls throughout the whole of the 2023/24 financial year. In our view, the Council has correctly responded 'No' to the relevant governance assertions.

Conclusion: We do not accept these objections for further consideration since the relevant action has now been taken by the Council.

Objection 7: You object to the failure of the Council to set aside a ‘sinking fund’ of £1,450 in the earmarked reserves in accordance with the conditions of a grant.

Findings: We note that since these objections were raised the Council has responded to you to indicate that the Council has included £3,000 in its 2024/25 budget as restricted, i.e. they are held in an earmarked reserve and not part of the Council’s general reserves. We note from the Council’s website that the Council’s restricted fund accounting for 2024/25 includes the this sinking fund.

We have seen no evidence of the Council’s actions regarding this fund during 2023/24; however, we also note that the Council responded ‘No’ to Assertion 1 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year. In our view, the Council has recognised and addressed the issues raised with us in your objection.

Conclusion: We do not accept this objection for further consideration since the relevant action has now been taken by the Council.

Objection 8: You object to the response given to Assertion 8 of the 2023/24 AGAR due to the failure of the Council to consider the financial and reputational impact of the two legal cases.

Findings: We note that since these objections were raised the Council has responded to you to indicate that the Council has included £15,000 in its 2024/25 budget as earmarked for use in rebuilding the wall and that the other case had already been concluded prior to the year end.

The requirements of a ‘Yes’ response to Assertion 8 are that:

- the Council needs to have considered if any events that occurred during the financial year or after the year-end, have consequences, or potential consequences, on the authority’s finances; and
- if any such events are identified, the authority then needs to determine whether the financial consequences need to be reflected in the statement of accounts.

In our view, neither of the cases that you refer to in your objection have an impact on the 2023/24 AGAR, therefore a ‘Yes’ response by the Council to Assertion 8 was correct..

Conclusion: We do not accept this objection for further consideration.

Objections 10 and 13: You object to the incorrect categorisation of contractor costs as staff costs within Box 4 on the 2023/24 AGAR and expenditure incurred of £2,750 for the provision of a maintenance employee (now noted to be a contractor), which was not minuted, nor has a contract been seen.

Findings: We note that the Clerk has responded to you to confirm the details of your objection to contract costs being included in Box 4. We note that the Council has incorrectly included contractor costs within Box 4; however, this issue will be picked up as part of our limited assurance review work.

We are minded to raise a reporting matter concerning this issue in our external auditor report on the 2023/24 AGAR.

We note that you have not provided any facts or grounds to object to the expenditure on the maintenance contractor being unlawful. We note that if the services were not contracted in line with the financial regulations, as you have alleged, the Council has already responded 'No' to Assertion 2 on the 2023/24 AGAR.

Conclusion: We do not accept these objections for further consideration since, in our view, further investigation at Step 3 would be a disproportionate response and our limited assurance review team will be considering the issue of misclassification of expenditure.

Objection 12: You object to the response given to Assertion 1 of the 2023/24 AGAR for the following reasons (Assertion 1):

- a. the 2024/25 budget setting process did not consider earmarked reserves;
- b. the 2024/25 budget setting process did not include a review of the 2023/24 budget and spending;
- c. the failure to consider the level of general reserves when setting the budget for 2024/25;
- d. failure to consider the potential impact on the budget of the outcome of a legal case brought against the Council;
- e. failure to consider a 3 year forecast when preparing the budget for 2024/25;
- f. failure to approve earmarked reserves during 2023/24.

Findings: We note that the budget setting process as documented on the Council's website was not compliant with all the requirements of the Practitioners' Guide, the Council's financial regulations and section 49A of the Local Government Finance Act 1992; this requirements being reflected in the various elements of your objection listed

above. We also note that the Council responded 'No' to Assertions 1 and 2 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year and that it did not have effective internal controls throughout the whole of the 2023/24 financial year. In our view, the Council has correctly responded 'No' to the relevant governance assertions.

Having reviewed the 2025/26 budget documentation on the website, we recommend that the Council discusses these issues when considering its responses to the 2024/25 AGAR governance assertions.

Conclusion: We do not accept these objections for further consideration since the correct governance assertion responses were included in the 2023/24 AGAR by the Council.

Objection 14: You object to expenditure of £685 paid in settlement of the hall patio doors which should have been approved for payment from an earmarked reserve.

Findings: We note that the Clerk has responded to you to confirm that the payment was made from restricted funds. We note that you have not provided any facts or grounds to object to the expenditure on the doors being unlawful.

Conclusion: We do not accept this objection for further consideration since, in our view, further investigation would be a disproportionate response.

Objection 15: You object to the failure to follow financial regulations during the year in relation to the preparation and review of monthly bank reconciliations.

Findings: We note that regular review of bank reconciliations by full Council is a mandatory requirement of paragraph 1.10 of the Practitioners' Guide (Assertion 1) and a requirement of paragraph 2.2 of the Council's financial regulations (Assertion 2).

We have not seen evidence in the minutes that these regular reviews were undertaken by the Council throughout 2023/24; we are aware that the Council did not have access to its banking records for some months following the elections in May 2023.

We also note that the Council responded 'No' to Assertions 1 and 2 on the 2023/24 AGAR, recognising that it did not have effective financial management throughout the whole of the 2023/24 financial year and that it did not have effective internal controls throughout the whole of the 2023/24 financial year. In our view, the Council has correctly responded 'No' to the relevant governance assertions.

Conclusion: We do not accept these objections for further consideration since the relevant action has now been taken by the Council.

Please note that, following this notification of our decisions not to accept Objections 1, 13 and 14 above for consideration, you have 21 days from tomorrow to lodge an appeal with the court regarding our decisions, should you so wish.

Kind regards

Rebecca

Rebecca Plane | Head of Challenge | Engagement Lead

PKF

For and on behalf of PKF Littlejohn LLP

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From: SBA <SBA@pkf-l.com>

Sent: 15 January 2025 17:42

Cc: clerk@hartlebury-pc.gov.uk; SBA <SBA@pkf-l.com>

Subject: HARTLEBURY PARISH COUNCIL - OBJECTIONS TO 2023/24 AGAR - ELIGIBILITY DECISIONS - STEP 1

Copied to the Council for information and as a request for confirmation of objector's electoral status

Dear *****

Thank you for your email and attached excel spreadsheet summary of objections which was received by us as appointed auditors to the Council on 6 August 2024. As notified to you on 27 August 2024, the excel spreadsheet, attached to your email of 6 August 2024, has been used as the basis of carrying out the eligibility decisions. Apologies for the delay in carrying out the eligibility decisions.

Requirements for an eligible objection

Section 27 of the Local Audit and Accountability Act 2014 (the 2014 Act) provides that local government electors for an area may object to the Council's accounts concerning a matter in respect of which the auditor could:

- make a public interest report under paragraph 1 of Schedule 7 of the 2014 Act. Paragraph 1 of Schedule 7 of the 2014 Act provides that auditor must consider whether, in the public interest, they should make a report on any matter coming to their notice during the audit and relating to the Council or an entity connected with the Council, so it can be considered in accordance with Schedule 7 of the 2014 Act or brought to the public's attention; and/or
- make an application to the court for a declaration that an item of account is contrary to law under section 28 of the 2014 Act.

Section 27 requires that objections must be made in writing and copied to the Council.

Regulation 14 of the Accounts and Audit Regulations 2015 (the 2015 Regulations) provides that objections may only be made in a single 30-day period of which notice has been given under Regulation 15 of the 2015 Regulations.

Regulation 17 of the 2015 Regulations provides that a notice of objection under Section 27 of the 2014 Act must specify:

- the facts on which the local government elector relies;
- the grounds on which the objection is being made; and
- so far as is possible, particulars of any item of account which is alleged to be contrary to law; and any matter in respect of which it is proposed that the auditor could make a public interest report under section 24 of and paragraph 1 of Schedule 7 to the 2014 Act.

Furthermore in November 2024, in exercise of the power in paragraph 9 of Schedule 6 of the 2014 Act, the National Audit Office, on behalf of the Comptroller and Auditor General, issued Auditor Guidance Note 4: [Auditors' Additional Powers and Duties](#) (AGN 04). Paragraphs 23 to 32 of AGN 04 provide guidance on determining whether an objection is eligible at Step 1 of the objection process. We must have regard to that guidance.

Thus in order for your objections to be categorised as 'eligible' under Step 1 of the guidance issued by the National Audit Office, we must:

- Confirm that the objections were received by us during the Council's 30 working day public rights period;
- Confirm that you have sent a copy of your objections and any attachments to the Council;
- Confirm that each objection contains the facts relating it to an item of account and/or a governance assertion on the 2023/24 AGAR;
- Confirm that each objection contains the grounds explaining why an item of account on the 2023/24 AGAR is alleged to be unlawful and/or why a governance assertion on the 2023/24 AGAR is alleged not to have been complied with by the Council; and
- Receive confirmation from the Council that you were a registered elector of the parish on the date that we received your objections.

Your objections

You have objected to:

1. the omission of assets from the value of fixed assets stated in Section 2, Box 9 of the 2023/24 AGAR (Assertion 1 and Box 9);
2. the failure of the Council to complete and submit a VAT return for the 2022/23 year end during 2023/24 (Assertion 1);

3. the failure of the Council to maintain access to HMRC PAYE/NI records and make all the required payments during the year (Assertions 2 and 3);
4. the failure to follow financial regulations in respect of operating a purchase ordering system during the year (Assertion 2);
5. matters in relation to CIL funds:
 - a. the failure to consider the need to return any unspent CIL funds and the impact this could have on the Council's budget and finances (Assertions 1 and 5)
 - b. failure to provide a copy of the CIL during the inspection of the accounts
 - c. failure to publish CIL receipts and expenditure during the year on the Council's website (Assertion 3)
 - d. failure to review CIL during the year;
6. the failure of the Council to follow financial regulations in respect of budget monitoring reports and explanation of budget variances during the year in the form of a budget v actual comparison (Assertion 2);
7. the failure of the Council to set aside a 'sinking fund' of £1,450 in the earmarked reserves in accordance with the conditions of a grant (Assertion 1 and Box 7);
8. the response given to Assertion 8 of the 2023/24 AGAR due to the failure of the Council to consider the financial and reputational impact of the two legal cases (Assertion 8)
9. matters in relation to the public rights period 27 June to 7 August 2024 :
 - a. the failure to publish Sections 1 and 2 of the AGAR and the notice on the Council's website before the start of the public rights period
 - b. the failure to minute the dates set for the public rights period
 - c. the published dates were inaccurate and conflicted with the clerk's holiday
 - d. the failure to publish the explanation of variances and discrepancies on the Council's website
 - e. the removal of prior year AGARs from the website;
10. the incorrect categorisation of contractor costs as staff costs (Box 4) on the 2023/24 AGAR (Assertion 1, Boxes 4 and 6);

11. the failure to provide a copy of the internal audit report prior to the public rights period inspection;
12. the response given to Assertion 1 of the 2023/24 AGAR for the following reasons (Assertion 1):
 - a. the 2024/25 budget setting process did not consider earmarked reserves
 - b. the 2024/25 budget setting process did not include a review of the 2023/24 budget and spending.
 - c. the failure to consider the level of general reserves when setting the budget for 2024/25
 - d. failure to consider the potential impact on the budget of the outcome of a legal case brought against the Council
 - e. failure to consider a 3 year forecast when preparing the budget for 2024/25
 - f. failure to approve earmarked reserves during 2023/24.
13. expenditure incurred of £2,750 for the provision of a maintenance employee (now noted to be a contractor), which was not minuted, nor has a contract been seen (Assertion 2, Boxes 4 and 6);
14. Expenditure of £685 paid in settlement of the hall patio doors which should have been approved for payment from an earmarked reserve (Assertion 2); and
15. The failure to follow financial regulations during the year in relation to the preparation and review of monthly bank reconciliations (Assertion 2)

Our eligibility decisions

Your objections were received by us during the Council's public rights period and have been copied to the Council. The items in Objections 1, 2, 3, 4, 5a, 5c, 6, 7, 8, 10, 12, 13, 14 and 15 are all linked to governance assertions or items of account in the 2023/24 AGAR and the grounds for the objections have been explained; they would therefore be considered to be eligible in those respects. We will be in touch in due course with our decision regarding the acceptance of any eligible objections for further consideration.

We have assessed Objections 9 and 11 as ineligible since they do not relate to a governance assertion or item of account on the 2023/24 AGAR, as they relate to matters in respect of the public rights period that took place during 2024/25 i.e. in June - August 2024. We have assessed Objection 5d as ineligible since the facts and grounds on which

the objection relies have not been specified. We will consider whether in our view the ineligible objections have an impact on the 2023/24 AGAR or on our report on the AGAR before completing our limited assurance review of the AGAR.

Overview of the objection process, timescales and costs

Please see below a brief explanation of the objection process for your information:

- Step 1 – eligibility:
 - Receipt of objections;
 - Assessment of objections against eligibility criteria;
 - Notification of eligibility decisions (copied to Council – i.e. this email); and
 - Confirmation of objector’s electoral status.
- Step 2 – acceptance:
 - Assessment of eligible objections against acceptance criteria; and
 - Notification of acceptance decisions (copied to Council).
- Step 3 – consideration & decision:
 - Request for information including formal response from Council in respect of accepted objections (copied to objector);
 - Analysis of accepted objections and information received from Council;
 - Request for further clarification/information from objector and/or Council if required (copied to objector/Council);
 - Collation and redaction of material documents as appropriate;
 - Sharing of material documents if not previously shared with objector;
 - Analysis of comments received on material documents;
 - Determination of accepted objections;
 - Decision letter including statement of reasons issued to objector (copied to Council);
 - Statutory reporting issued to Council if appropriate (copied to objector); and
 - Appeal period if our decision is not to apply to the Courts regarding an alleged unlawful item of account (21 days).

- Following completion of the challenge work:
 - Completion of our limited assurance review of the AGAR
 - External auditor report, including any challenge related reporting matters, and certificate on 2023/24 AGAR issued to Council along with invoice for the limited assurance review and the additional work as a result of challenge correspondence received

We are required to make our best endeavours to complete Step 1 within a week of receipt, then Step 2 within a further month, then Step 3 within a further six months. Steps 1 and 2 have been severely delayed this year due to the unprecedented volume of objections and other challenge correspondence received during 2024, we apologise for the delays as a result of this. Where we are not able to complete Step 3 and decide the objection within six months, we will inform the objector and the authority. If we have not been able to conclude in the meantime, we will provide further updates on progress every three months until the objection is decided.

At this stage, we would like to remind both you and the Council of the need to ensure compliance with relevant data protection legislation (including the General Data Protection Regulations (GDPR)). This could include, for example, redacting personal information (such as the objector's name, address or other identifying information) from any subsequent publication or sharing of the objections and related correspondence.

Please note that all the costs of any additional work that we carry out as a result of challenge correspondence received are met by the Council (and therefore the local taxpayers through increased council tax). The costs are set by Smaller Authorities Audit Appointments Ltd (SAAA) and such work is carried out by an engagement lead at a cost to the authority of £355 per hour plus VAT, i.e. £2,485 per day plus VAT. If you wish to withdraw any or all of your objections to the AGAR, this can be done at any point in the process. We will still consider whether in our view the withdrawn objections have an impact on the 2023/24 AGAR or on our report on the AGAR before completing our limited assurance review of the AGAR; however, the additional reporting stages of the process will be avoided and so the costs to the Council will be lower.

Kind regards

Kerry

Kerry Cutting | Director | Engagement Lead

PKF

sba@pkf-l.com