

Newton Abbot Town Council

Internal Audit Report: Final update 2021-22

Stuart J Pollard

*Director
Auditing Solutions Ltd*

Background

Statute requires all town and parish councils to arrange for an independent Internal Audit (IA) examination of their accounting records and systems of internal control and for the conclusions to be reported each year in the Annual Governance and Accountability Return (AGAR).

This report sets out the work undertaken in relation to the 2021-22 financial year, during our two review visits to the Council's, which took place on 20th October 2021 and 25th May 2022, together with preliminary work before each visit at our offices. We thank the Deputy Clerk / RFO for assisting the process, providing all necessary documentation in either hard copy or electronic format to facilitate completion of our review for the year.

Internal Audit Approach

In undertaking our review, we have again had regard to the materiality of transactions and their susceptibility to potential mis-recording or misrepresentation in the year-end Statement of Accounts / AGAR. Our programme of cover is designed to afford assurance that the Council's financial systems remain robust and operate in a manner to ensure the ongoing effective probity of transactions and to afford a reasonable probability of identifying any material errors or possible abuse of the Council's own and the national statutory regulatory framework. The programme is also designed to facilitate our completion of the 'IA Certificate' in the Council's AGAR, which requires independent assurance over a series of internal control objectives.

Overall Conclusions

We are pleased to advise that, based on the work undertaken this year, the Council and its officers continue to maintain adequate and generally effective internal control arrangements with only a few issues identified requiring attention as detailed in the following report with resultant recommendations further summarised in the appended Action Plan. We wish to express our appreciation to officers for the way the accounting records are maintained and filed.

Based on the overall satisfactory conclusions drawn from our work programme this year, we have duly signed off the IA Certificate in the year's AGAR assigning positive assurances in each relevant area.

We take this opportunity to remind the Clerk and Finance and Admin Officer (FAO) of the requirements of the guidance notes in the year's AGAR in relation to the documentation that should be displayed on the Council's website, together with the need to ensure compliance with the timing requirements for publication of the Notice of Public Rights to examine the Council's financial and other documentation for the year.

Detailed Report

Maintenance of Accounting Records & Bank Reconciliations

Our objective here is to ensure that the accounting records are being maintained accurately and currently and that no anomalous entries appear in the cashbooks as prepared. The Rialtas Omega software continues in use with two Lloyds bank accounts in day-to-day use (Current and Instant Access Account), these being operated in a single cashbook (number 1) with daily, as required, inter-account transfers effected by the bank to retain the Current account with a balance of approximately £100. Surplus funds have been deposited in the CCLA Deposit Fund with, as there are only limited transactions annually, no cashbook, but a separate nominal control account set up in Omega.

Consequently, we have: -

- Ensured the accurate roll forward of the 2020-21 closing balances as opening balances in the 2021-22 Omega accounts;
- Ensured that the accounts remain “in balance” at the financial year-end;
- Checked four months’ transactions on the combined Current and Instant Accounts cashbook (April, August, plus January and March 2022) by reference to supporting bank statements;
- Checked the accuracy of the bank reconciliations on the same two accounts on 30th April and 31st August, plus 31st January and March 2022 with no uncleared payments or other unresolved anomalies existing at the year-end; and
- Ensured the accurate disclosure of the combined cash and bank account balances at 31st March 2022 in the year’s AGAR at Section 2, Box 8.

Conclusions and recommendation

We note that members are periodically provided with copies of month-end bank reconciliations, budget reports and other financial documentation for scrutiny and sign-off. The NALC model Financial Regulations (FRs) sets out at para 2.2 that bank reconciliations should be the subject of independent review (i.e., neither by the Chairman nor a bank signatory) at least quarterly. In order that this check may be more effective, we suggest that the checking councillor should also be provided with and formally sign-off the supporting month-end bank statements and cashbooks as and when reconciliations are reviewed as evidence that the respective balances are accurately recorded in the reconciliation statement.

*RI. A nominated councillor should, in line with best practice and as detailed in the NALC model Financial Regulations, review bank reconciliations, together with supporting bank statements and Omega cashbook detail at least quarterly, indicating completion of the review by signing / initialling and dating all three documents. **Monthly reviews are now being undertaken by a nominated councillor.***

Review of Corporate Governance

Our objective here is to ensure that the Council has a robust regulatory framework in place; that Council and Committee meetings are conducted in accordance with the adopted Standing Orders (SOs) and that, as far as we may reasonably be expected to ascertain, no actions of a potentially unlawful nature have been or are being considered for implementation. We also aim to ensure that

appropriate policies, procedures and protocols are in place to prevent and provide a reasonable assurance of the detection of any fraudulent or corrupt activity.

We have examined Council and Standing Committee (excluding Planning) minutes reviewing those for the financial year and to date in 2022-23, as posted on the Council's website, to identify whether or not any issues exist that may have an adverse effect, through litigation or other causes, on the Council's future financial stability and are pleased to record that no concerns have been identified.

We note that the Council's SOs & FRs have been further reviewed and readopted by the Council March 2022. We have examined the content of both documents in some detail noting that neither are wholly in line with the NALC model documents: specifically, the SOs include no reference to tendering / contract procedures, although we acknowledge the existence of a separate Procurement Policy. As indicated in the first section of this report, the FRs make no reference to independent scrutiny and "sign-off" of bank reconciliations and include reference to the procedures in place for the release of payments which are no longer in line with actual working practice: they also refer to a petty cash holding of £500 compared with the actual intended value of £200.

We are pleased to note that the external auditors issued the certificate on the 2020-21 AGAR with one relatively minor concern expressed relating to publication of the 2019-20 Notice of Public Rights and the related responses given in the 2020-21 Governance Statement (Section 1): we are pleased to note that the Council has acted in accordance with the requirements of the 2015 Accounts and Audit Regulations in that respect in relation to publication of the 2020-21 detail.

Conclusions and recommendation

As indicated above, we consider that the SOs and FRs require a more detailed review, update and amendment to reflect both best practice, as set out in the NALC model documents, and the actual approved working practices that are now in place. We have provided the Deputy Clerk with electronic copies of the latest NALC model documents and urge that the existing documentation be brought more closely into line with the best practice set out therein.

We will continue to monitor the Council's approach to governance at future reviews reporting our conclusions accordingly.

R2. The Council's Standing Orders and Financial Regulations should both be reviewed and brought into line with best practice as set out in the NALC model documents, being tailored appropriately to meet the Council's specific requirements and reflect actual approved working practices. The Council reviews the Standing Order's and Financial Regulations annually and has tailored both documents to meet the Council's requirements and they reflect the actual, approved working practices.

Review of Expenditure

Our aim here is to ensure that:

- Council resources are released in accordance with the Council's approved procedures and budgets;
- Payments are supported by appropriate documentation, either in the form of an original trade invoice or other appropriate form of document confirming the payment as due and/or an acknowledgement of receipt, where no other form of invoice is available;

- All discounts due on goods and services supplied are identified and appropriate action taken to secure the discount;
- The correct expense codes have been applied to invoices when processed; and
- VAT has been appropriately identified and coded to the control account for periodic recovery.

We discussed the payment approval and release process with the Deputy Clerk during our interim review visit and consider the controls in place appropriate with effective segregation of duties in place between setting up payments online and their physical release. We also note that a certification stamp is generally affixed to each invoice, although examination of the files of processed invoices at our interim review indicated that not all documents had the stamp affixed to them. We are pleased to acknowledge the action taken following issue of our interim report to acquire a more detailed certification stamp which we are pleased to acknowledge is now evident on all payment documentation in the latter stages of the year

To confirm the effectiveness of the controls over the processing of payments, we have now selected an extended test sample of 69 individual payments, including 2 Non-Domestic Rate bills, processed in the financial year including all those individually in excess of £3,000, together with a more random sample of every 40th payment, as listed in the Omega cashbooks. Our test sample totals £351,960 equating to 54% by value of the non-pay related payments processed in the year with all the above criteria met.

We have reviewed detail of the nominal ledger VAT control account for the financial year noting submission and recovery of the final 2020-21 reclaim and first three reclaims for 2021-22. We shall ensure recovery of the final 2021-22 reclaim at our 2022-23 interim review visit.

Conclusions and recommendation

We are pleased to record that the controls in place over the payment of traders' invoices continue to operate effectively, although, as indicated in the previous section of this report, working practice differs from that set out in the adopted FRs. To further strengthen controls and afford all officers a greater degree of protection should any fraudulent or other inappropriate payments occur, we suggested in our interim report that a more robustly designed rubber stamp to that in use at that time be acquired and are pleased to note the action taken to acquire a more detailed stamp, which, on the evidence seen at this final review is now being routinely affixed to all invoices and completed appropriately.

Whilst not a significant issue, due to the volume of payment transactions each month, it is not a simple task to trace individual invoices in the lever arch files where they are stored. To ease that task, we suggest that all payments be allocated a unique consecutive transaction number through the year, that detail being recorded on each payment voucher and also in the Omega accounts as though it were a cheque number.

R3. To further strengthen and formally demonstrate the effectiveness of controls over the approval and release of payments, the existing certification stamp should be replaced with one affording greater indication of the various stages of payment review and approval as set out in the body of the report. A more detailed stamp has been acquired and is being affixed to invoices and signed off accordingly.

R4. Consideration should be given to the allocation of a unique sequential reference number to each payment as it is processed during the year, that number being recorded on the payment voucher and also on the Omega cashbook similarly to a cheque number.

Assessment and Management of Risk

Our aim here is to ensure that the Council has put in place appropriate arrangements to identify all potential areas of risk of both a financial and / or health and safety nature, whilst also ensuring that appropriate arrangements exist to monitor and manage those risks to minimise the opportunity for their coming to fruition.

We are pleased to note that the Council's Risk Management Plan / Register was reviewed and re-adopted by the Council at the July 2021 meeting: we have reviewed the content and consider it appropriate for the Council's present needs noting that it includes detail of both financial and physical risks also detailing the controls in place to mitigate them.

We have examined the Council's current year insurance policy arranged through WPS, to ensure that appropriate cover remains in place, noting that Employer's and Public Liability cover stand at £10 and £15 million respectively, together with Fidelity Guarantee cover at £1 million and Business Interruption – Loss of Revenue cover at £20,000, all of which we consider appropriate for the Council's present requirements.

Conclusions

We are pleased to record that no issues arise in this area warranting formal comment or recommendation this year.

Budgetary Control & Reserves

We aim in this review area to ensure that the Council has appropriate procedures in place to determine its future financial requirements leading to the adoption of an approved budget and formal determination of the amount to be precepted on Teignmouth DC; that effective arrangements are in place to monitor budgetary performance throughout the financial year and that the Council has identified and retains appropriate reserve funds to meet future spending plans.

We are pleased to note the satisfactory conclusion of the Council's 2022-23 budget and precept deliberations with the latter formally approved and adopted by Council at £1,082,000 at the February 2022 full Council meeting.

We are again pleased to note that members continue to receive periodic budget reports throughout the year, also again noting that in a number of areas expenditure has been charged to nominal account codes with no assigned budget: if the number of nominal analysis codes where such recording of payments is deemed necessary appropriate budgets should be allocated at the start of each financial year to facilitate effective monitoring of spending and performance. Conversely, if not deemed necessary to record such detailed analysis, the number of nominal account codes should be reduced, and headings grouped generically to provide more rationalised and salient reporting of performance.

Similarly, we have noted previously that members are reluctant to allocate potential income budgets in a number of areas due to the uncertainty over the potential amounts to be received and do not consider this a significant issue. We have, where significant variances exist, examined the detailed transaction reports in the Omega accounts obtaining appropriate explanations in every case with no residual issues requiring further enquiry or comment.

Conclusions and recommendation

No significant concerns arise in this area, although, as above, we consider that the number of individual nominal expense codes currently in place could be rationalised into more generic headings with a formal budget value assigned to each.

R5. Consideration should be given to a degree of rationalisation of the number of individual nominal expense codes with a budget value assigned to each to afford more meaningful reporting of actual performance against the approved budget.

Review of Income

The Council receives income primarily by way of the annual precept, together with limited room hire fees and from a plethora of relatively small miscellaneous sources.

Due to the ongoing Covid situation during the early stages of the year, only limited variable income was received: we noted that room bookings at the Museum were beginning to increase, detail now being managed through the RBS Rialtas Booking software. At our interim review, we acquired detail of the few chargeable “hirings” that occurred in the last two weeks of August and first two in September 2021 ensuring that appropriate fees were invoiced in accordance with the approved scales of fees and charges. We have, at this final review, now also examined detail of March 2022 bookings ensuring that appropriate fees have been charged.

We have also examined the Sales Ledger – “Unpaid invoices by date” report at the financial year-end with only six unpaid debts existing, three of which relate to one hirer the oldest being dated 27th January 2022: consequently, we do not consider there to be any problem currently in this respect, but urge that the position be kept under review to ensure that that particular hirer’s debt does not increase to an unmanageable level.

Due to the Clerk and Deputy Clerk’s absence from the office on the day of our scheduled final review visit due to the need for their attendance at an SLCC conference, our work in this area has been somewhat curtailed this year. Consequently, we shall focus greater attention on the various sources of income received by the Council at our next review visit (interim 2022-23).

We have also examined the nominal account detail in Omega by income code for the financial year establishing, as far as we are reasonably able, that all income due to the Council has been received in a timely and appropriate manner with no issues arising warranting formal comment.

Conclusions

No issues arise in this area warranting formal comment or recommendation.

Petty Cash Account

We are required, as part of the AGAR IA Certificate, to review and verify the soundness of controls over the operation of the Council’s petty cash account. We have noted previously that a separate nominal account code (# 250) remains in place, with no transactions again recorded against the code in the current or previous financial year: we are, however, pleased to note that the Omega account now correctly records the “imprest” holding as £200.00.

The account is operated, as above, on an “imprest” basis with an intended total cash holding of £200, with monthly reimbursement of each month’s expenditure. We examined three months’ transactions (June to August 2021) at our interim visit checking detail as recorded on the spreadsheet control records to the supporting documentation. We are also pleased to note the implementation of the spreadsheet format we provided at our final 2020-21 visit, although, from examination of a recent (February 2022) reimbursement, it is still not being used as intended with a single line used for each individual voucher and appropriate analysis of the actual expenses incurred under each nominal ledger code net of VAT with any VAT incurred identified in a separate column for analysis in Omega and inclusion in the quarterly VAT reclaims. Detail of the purpose of the expenditure, rather than its value, is being recorded in the analysis columns.

We discussed this with the Deputy Clerk at our interim visit who agreed to ensure the more appropriate recording of individual net and VAT payments in the analysis on the spreadsheet to avoid the need for a separate analysing spreadsheet being prepared each month to generate the journal input to Omega: this does not appear to have been actioned and we note from the most recent example examined that, despite till receipts identifying elements of incurred VAT. None has been identified in the spreadsheet analysis, nor has it been identified in the Omega cashbook detail. In acknowledging that the incurred VAT is likely to be minimal, the Council is entitled to reclaim it and it should be identified accordingly for recovery.

We also checked the physical petty cash holding at our interim review visit noting that the combined value of the cash held and, as yet, “un-reimbursed” vouchers, reflected a surplus holding of £30.04 against the £200 imprest. £43.75 is held in physical cash with vouchers totalling £186.29. We have not been able to review this again at this final review due to the absence of officers during our visit and will, consequently revisit this area at our 2022-23 interim visit.

Conclusions and recommendations

Whilst no material matters have been identified in this area, at our interim visit we noted the apparent excess holding of £30.04 and suggested that the previously in place independent review / check of the cash and voucher holding be reintroduced to afford a regular check on the accuracy of transaction recoding in the account.

R6. The source of the apparent £30.04 cash surplus should be investigated, and appropriate action taken to bring the balance back to the intended £200.00 holding. The surplus was addressed to bring the balance back to the £200.00 stated holding.

R7. The previously provided spreadsheet record should be used appropriately to provide an accurate analysis of the monthly spending for creation of a posting journal in Omega when reimbursement is made, also identifying the value of any VAT incurred for appropriate analysis in the Omega accounts and recovery from HMRC. This will be implemented from 1st April 2022.

Review of Staff Salaries

In examining the Council’s payroll function, we aim to confirm that salary payments are in line with the Council approved pay rates and that extant legislation is being appropriately observed as regards adherence to the requirements of HMRC legislation in relation to the deduction and payment over of income tax and NI contributions.

The Council employs a number of staff: the Deputy has, as in previous years, provided detail of the NJC spinal point (or hourly rate) and basic contracted weekly hours payable to each employee.

Consequent on the above, we have checked and agreed the monthly gross salaries paid in September 2021 to virtually all employees who have kindly provided their supporting payslips, due to the ongoing reluctance of the Payroll Manager at Teignbridge DC to provide the information. We note that the two Facilities Maintenance Officers work overtime and are paid accordingly based on the weekly timesheet detail of total hours worked. Examination of the time sheets supporting the overtime paid with their September 2021 salaries reveals that the timesheets do not identify the actual overtime worked and consequently paid and suggest that the documents be amended accordingly to provide for that information's appropriate recording. We also note that the timesheets are not being signed either by the employees themselves or by their supervisor confirming that the overtime was necessarily worked and is appropriate for payment.

We have also checked detail of the tax, NI and pension (where applicable) deductions for the same month for each employee to ensure that they have been correctly calculated in accordance with the HMRC PAYE and NI tables and appropriate pension scheme deduction percentages with no issues arising.

The NJC national 2021-22 pay award was finally approved in March 2022: consequently, we have examined a small sample of staff March 2022 payslips where the pay award and arrears backdated to 1st April 2021 has been applied: it is not practicable to attempt verification of those officers pay where variable hours have been worked during the year. We are pleased to record that no issues have been identified in relation to the officer's March 2022 pay examined.

Conclusions and recommendations

As indicated in previous year's reports, we remain concerned that, as the employer of staff, the Council is not being provided routinely with copies of payslips providing full detail of the basis of individual staff pay for retention and internal audit examination (Regulation 5 of the 2015 Accounts and Audit Regulations refers – Statutory Instrument No 234), which states that: -

“Internal audit 5.— (1) A relevant authority must 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. (2) Any officer or member of a relevant authority must, if required to do so for the purposes of the internal audit— (a) make available such documents and records; and (b) supply such information and explanations; as are considered necessary by those conducting the internal audit. (3) In this regulation “documents and records” includes information recorded in an electronic form.”

As advised previously, the responsible officer at TDC should be reminded of this statutory requirement, which overrides GDPR considerations to ensure that all necessary supporting documents (i.e., pay slips, actual documentation supporting HMRC & pension fund administrator's payment detail) is available for our examination – not just a TDC generated spreadsheet record summarising the information) to facilitate verification of the Council's payroll costs.

R6. The Facilities Maintenance Officers' timesheets should be amended to make provision for identification of the overtime hours payable, together with provision for the officers to sign the timesheets and for their counter-signature by their supervisor confirming the overtime as necessarily worked and payable. These have been amended to reflect the recommended changes.

Fixed Asset Registers

The Practitioner's Guide requires all councils to maintain a record of all assets owned. We have reviewed the Council's register noting that new acquisitions in 2021-22 have been recorded appropriately.

We have recorded previously that the register in its present state identifies assets in groups at a very high level and should, in line with best practice identify the following specific detail for each Council owned asset:

- Date of acquisition (where known)
- Purchase cost, where known, or, if not prior year asset register value
- Position in the Town
- Serial / registration number (where applicable)
- Insured value.

Additionally, in line with best practice, we consider that a photographic register of various, potentially at risk items by way of either theft, wilful or accidental damage, should be developed. Many of our clients have developed suitable photographic registers which have proved to be of benefit when pursuing insurance reclaims or, in more serious instances, police enquiries and we urge that the Council should also consider development of such a register.

We have ensured that the asset value reported in the year's AGAR at Section 2, Box 9 agrees with the updated register for 2021-22.

Conclusions and recommendations

As indicated above, we consider it essential that the asset register is maintained with appropriate and full detail of all individual assets owned by the Council rather than grouping them together in generic headings. Ideally, as we have also previously suggested, an inventory register of individual office furniture and equipment should also be maintained, again ideally identifying the purchase cost and building up to the total asset register and insurance valuation. The Deputy Clerk has indicated that this will be addressed in 2022-23 and we will, consequently, check on progress at our next visit. We have therefore restated the recommendations in this report so that the issues are not overlooked.

Whilst fully appreciating the causes of the delay in actioning and developing a more enhanced and informative asset register, we have reiterated our prior year recommendations in this respect in order that appropriate action is not overlooked. Officers will need to be mindful that best practice requires "gifted" assets to be recorded with a nominal value of £1: these should be recorded in the Asset register rather than the "inventory of lower value items, to ensure that they are reflected in the Council's AGAR at Section 2, Box 9.

R9. The Council should determine a formal value above which assets are regarded as "Fixed assets" as opposed to inventory items: this is generally set at around £1,000.

R10. A more detailed asset register than in place currently of high value land, buildings and equipment, etc should be developed, together with an "inventory" of items with a value below the above threshold.

R911 Consideration should also be given to the development of a photographic register of potentially at risk of theft and / or damage (wilful or accidental) assets to assist the smooth progression of any potential insurance claim.

Investments and Loans

The council has placed surplus funds amounting to £374,000 in the CCLA Public Sector Deposit Fund (PSDF), which is earning interest monthly, albeit at relatively low rates due to the current financial situation resulting from Covid, detail of which we have agreed to the supporting monthly advice statements.

We have checked and agreed the half-yearly UK Debt Agency repayments to their demand invoices as part of our previously referenced expenditure review with no issues arising. We have also at this final visit ensured the residual loan liability balance by reference to the UK Debt Agency website where all such local government loans are reported as at 31st March annually.

Conclusions

No issues arise in this area warranting formal comment or recommendation.

Statement of Accounts / AGAR

The Accounts and Audit Regulations, as amended periodically, require all councils to prepare annually a Statement of Accounts, now in the form of the AGAR, which, together with the Annual Governance Statement, is subject to independent external audit examination and certification.

As part of our review process, we have examined the Council's procedures in relation to the identification of detail for inclusion in the AGAR, which for most values is generated automatically by the Omega accounting software and duly verified the accuracy of that detail.

Conclusions

No issues arise in this area and we have, consequently, signed off the IA Certificate in the year's AGAR assigning positive assurances in each relevant area.

Rec. No	Recommendation	Response
Maintenance of Accounting Records & Bank Reconciliations		
R1	A nominated councillor should, in line with best practice and as detailed in the NALC model Financial Regulations, review bank reconciliations, together with supporting bank statements and Omega cashbook detail at least quarterly, indicating completion of the review by signing / initialling and dating all three documents.	<i>Monthly reviews are now being undertaken by a nominated councillor.</i>
Review of Corporate Governance		
R2	The Council's Standing Orders and Financial Regulations should both be reviewed and brought into line with best practice as set out in the NALC model documents, being tailored appropriately to meet the Council's specific requirements and reflect actual approved working practices.	<i>The Council reviews the Standing Order's and Financial Regulations annually and has tailored both documents to meet the Council's requirements and they reflect the actual, approved working practices.</i>
Review of Expenditure & VAT		
R3	To further strengthen and formally demonstrate the effectiveness of controls over the approval and release of payments, the existing certification stamp should be replaced with one affording greater indication of the various stages of payment review and approval as set out in the body of the report.	<i>A more detailed stamp has been acquired and is being affixed to invoices and signed off accordingly.</i>
R4	Consideration should be given to the allocation of a unique sequential reference number to each payment as it is processed during the year, that number being recorded on the payment voucher and also on the Omega cashbook similarly to a cheque number.	
Review of Budgetary Control and Reserves		
R5	Consideration should be given to a degree of rationalisation of the number of individual nominal expense codes with a budget value assigned to each to afford more meaningful reporting of actual performance against the approved budget.	
Petty Cash Account		
R6	The source of the apparent £30.04 cash surplus should be investigated and appropriate action taken to bring the balance back to the intended £200.00 holding.	<i>The surplus was addressed to bring the balance back to the £200.00 stated holding.</i>
R7	The previously provided spreadsheet record should be used appropriately to provide an accurate analysis of the monthly spending for creation of a posting journal in Omega when reimbursement is made, also identifying the value of any VAT incurred for appropriate analysis in the Omega accounts and recovery from HMRC.	<i>This will be implemented from 1st April 2022.</i>

Rec. No	Recommendation	Response
Review of Staff Salaries		
R8	The Facilities Maintenance Officers' timesheets should be amended to make provision for identification of the overtime hours payable, together with provision for the officers to sign the timesheets and for their counter-signature by their supervisor confirming the overtime as necessarily worked and payable.	<i>These have been amended to reflect the recommended changes.</i>
Fixed Asset Registers		
R9	The Council should determine a formal value above which assets are regarded as "Fixed assets" as opposed to inventory items: this is generally set at around £1,000.	
R10	A more detailed asset register than in place currently of high value land, buildings and equipment, etc should be developed, together with an "inventory" of items with a value below the above threshold.	
R11	Consideration should also be given to the development of a photographic register of potentially at risk of theft and / or damage (wilful or accidental) assets to assist the smooth progression of any potential insurance claim.	