

Annual Audit 2025 - 2026

PKF Littlejohn LLP have now completed their Limited Assurance Review and their report, certificate and the AGAR Parts 1 & 2 on which it was based are attached as Appendix A to this report.

The reported noted, that in their opinion

Except for the matters reported below, on the basis of our review of Sections 1 and 2 of the Annual Governance and Accountability Return (AGAR), in our opinion the information in Sections 1 and 2 of the AGAR is in accordance with Proper Practices and no other matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been met.

The AGAR was not accurately completed before submission for review:

- The smaller authority has not restated the prior year figure when revaluing assets in Section 2, Box 9. Please note that the Practitioners' Guide allows smaller authorities to use any reasonable valuation method, provided that the prior year figure is restated for consistency and comparability.*

and that the Council has complied with the Accounts and Audit Regulations 2015 in the publication of a Notice of Conclusion of Audit.

This exception arose as a result of the re-valuation of the Chapel of Rest and War Memorial in late 2025 for insurance purposes, which resulted in an increase in the overall asset value¹ from £329,280 at year end 2025 to £390,604 at year end 2026. The clerk had not correctly identified the requirement under the Practitioner's Guide to re-state the value at 2025, nor had this been identified by the internal auditor.

There were no notes under the section "Other matters not affecting our opinion which we draw to the attention of the authority"

Relevant documents are attached:

- Appendix A - SF0413_closureletter
- Appendix B - SF0413_AGAR (sections 1 and 2)
- Appendix C - SF0413_S3 (external auditor report and certificate)

The necessary [Notice of Conclusion of Audit](#) and [Section 3 – External Auditor Report and Certificate 2025/26](#) have been published to the parish website. Their invoice for services (£315 plus VAT) is included for authorisation at 12.2. on the agenda.

At its April meeting, the parish council acknowledged receipt of the Internal Audit Report on the year ending 31st March 2026, as commissioned from Suffolk Association of Local Councils (SALC) and circulated and tabled as Appendix G of [WPC.26.04.04](#), noting the comments set out in the report and any recommendations made which required action

¹ Box 9 – Total fixed assets plus long term investments and assets

on the part of either the Council or the Council's Responsible Financial Officer (**Minute 26.04.11.1 refers**).

The reported noted that that Council continued to maintain effective governance arrangements including a robust framework of financial administration and internal controls.

Comments and Additional comments made in the report are set out at **Appendix D** and the actions identified with progress to date are summarised below:

Item	Section	Action	Progress
1	Financial Regulations and Standing Orders:	Revisions to Financial Regulations scheduled for May meeting	Reviewed and adopted (Minute 26.05.07.1.11 refers)
2	Budgetary Controls	Record specific budget, reasoning, precept and impact within minutes at January meeting	Note to do so recorded as action for next January.
3	Proper Bookkeeping	With move to Scribe the powers underpinning each transaction will be recorded directly within the software.	Specific powers are now being recorded against each transaction in the accounting software
4	Assertion 10	1. Carry out data protection audits, mapping personal data being processed and carrying out data risk assessments. 2. Provide regular data protection compliance training for council staff and councillors. 3. Publish invitations to tender and details of contracts over £5000 quarterly 4. Publish annually: - o Details of all land and building assets; - o Grants to Voluntary, Community and Social Enterprise Organisations; - o Organisational Chart. 5. The Accessibility Statement will be updated to indicate the last review	Attached as Appendix E See proposal Q1, Q2 2026-27 published WPC.26.05.04 – Review of Inventory of Assets WPC.26.04.03 – Funds Disbursed in 2025-26 Attached as Appendix F Reviewed May '26 Minute WPC.26.05.07.1.1 - Accessibility statement for Wickhambrook Parish Council

Table 1

Councils must now have a process for handling data protection complaints. The clerk is currently reviewing the parish council's existing Data Protection Policy and Complaints Policy and will bring forward any recommended changes to the November meeting. Guidance and a flowchart have been accessed from SALC and are attached as **Appendix G**. A template Data Protection Complaints Policy is available through Breakthrough Communications (a specialist advisor SALC partners with), but only as part of one of their existing subscription packages.

The parish council's obligation under Assertion 10 to provide regular data protection compliance training for council staff and members could be catered for by booking training courses through SALC as and when they become available (this training is provided by Breakthrough Communications, booked direct with them and invoiced by SALC at £36 per delegate plus VAT). The total cost for the clerk and current councillors to complete this training would be £180 plus VAT.

An alternative approach would be to take up a subscription with Breakthrough Communications (see options at **Appendix H**). The benefit of this approach would be that as an annual subscription, the training for any new councillors elected in 2027 would also be covered. The subscription covers year round advice, training and resources for council communications, engagement, data protection and Freedom of Information (the latter two being specialist subjects which SALC appears to outsource to Breakthrough Communications). This subscription would be of particular benefit this year in preparation for the parish elections in 2027.

Powers:

Local Government Act 1972, s.111 – Power to do anything that will facilitate, be conducive to incidental to the discharge of its powers and functions.

Funding:

Revenue:

Training - £660

Financial Regulations

5.12. The requirement to obtain competitive prices in these regulations need not apply to contracts that relate to items (i) to (iv) below:

- i. specialist services, such as legal professionals acting in disputes;

Recommendation:

The parish council authorise the cost of an annual subscription to Breakthrough Communications (Pro) at £695 plus VAT.



Wickhambrook Parish Council
BY EMAIL

DDI:
+44 (0)20 7516 2200
Email:
sba@pkf-l.com
Date:
19 August 2026
Our Ref:
SF0413
SAAA Ref:
SB09407

Wickhambrook Parish Council
Completion of the limited assurance review for the year ended 31 March 2026

Dear Mrs Workman

We have completed our review of the Annual Governance & Accountability Return (AGAR) for Wickhambrook Parish Council for the year ended 31 March 2026. Please find our external auditor report and certificate (Section 3 of the AGAR Form 3) included for your attention as an attachment to the email containing this letter along with a copy of Sections 1 and 2 of the AGAR, on which our report is based.

The external auditor report and certificate details any matters arising from the review. The smaller authority must publish these documents immediately and at the next meeting consider the final external auditor report and decide what, if any, action is required.

Action you are required to take at the conclusion of the review

The Accounts and Audit Regulations 2015 (SI 2015/234) set out what you must do at the conclusion of the review. In summary, you are required to:

- Prepare a "Notice of conclusion of audit" which details the rights of inspection, in line with the statutory requirements. We attach a pro forma notice you may use for this purpose (a Word version is available on request).
- Publish the "Notice" along with the certified AGAR (Sections 1, 2 & 3) before 30 September 2026, which must include publication on the smaller authority's website. (Please note that when the statute and regulations were amended in 2014 and 2015, they did not include a requirement for the length of time for which that the "Notice" must be published. The previous statute required 14 days; but it is now up to the authority to make this decision).
- Keep copies of the AGAR available for purchase by any person on payment of a reasonable sum.
- Ensure that Sections 1, 2 and 3 of the published AGAR remain available for public access for a period of not less than 5 years from the date of publication.

Fee

We enclose our fee note, on page 4 of this attachment, for the limited assurance review, which is in accordance with the fee scales set by Smaller Authorities' Audit Appointments Ltd which can be found at <https://www.saaa.co.uk/audit-fees/>. This fee is statutory, must be paid and is due immediately on receipt of invoice, please arrange for this to be paid **at the earliest opportunity**.

Additional charges are itemised on the fee note, where applicable. These arise where either:

- we have had to issue chaser letters and/or exercise our statutory powers due to a failure to provide an AGAR by the submission deadline; or
- it was necessary for us to undertake additional work.

Please return the remittance advice with your payment, which should be sent to: PKF Littlejohn LLP, Ref: Credit control (SBA), 30 Churchill Place, Canary Wharf, London, E14 5RE. Please include the reference SF0413 or Wickhambrook Parish Council as a reference when paying by BACS.

Timetable for 2026/27

Next year we plan to set a submission deadline for the return of the completed AGAR Form 3 and associated documents (or Certificate of Exemption) in the usual way and this is expected to be Thursday 1 July 2027. It is anticipated that the instructions will be sent out during March 2027, subject to arrangements for the 2026/27 AGARs and Certificates of Exemption being finalised by Smaller Authorities' Audit Appointments Limited (SAAA). Our instructions will cover any changes about which smaller authorities need to be aware.

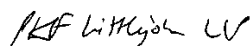
- The smaller authority must inform the electorate of a single period of 30 working days during which public rights may be exercised. The period must be **exactly** 30 working days, please do not set public rights dates that cover a longer period. This information **must be published at least the day before** the inspection period commences;
- The inspection period **must** include the first 10 working days of July 2027, i.e. 1 to 14 July inclusive. In practice this means that public rights may be exercised:
 - at the earliest, between Thursday 3 June and Wednesday 14 July 2027; and
 - at the latest, between Thursday 1 July and Wednesday 11 August 2027.

As in previous years, in order to assist you in this process we plan to include a pro forma template notice with a suggested inspection period on our website. On submitting your AGAR and associated documentation, as was the case for this year, we will need you to either confirm that the suggested dates have been adopted or inform us of the alternative dates selected.

Feedback on 2025/26

We would welcome feedback on your experiences with PKF Littlejohn LLP during the review for the year ended 31 March 2026. Such feedback is important to us to help us drive improvements in client service. If you wish to provide feedback, our satisfaction survey template can be used, which is available on our website on this page: <https://www.pkf-l.com/satisfaction-survey-for-the-year-ended-31-march-2026/>

Yours sincerely



PKF Littlejohn LLP

Wickhambrook Parish Council

Notice of conclusion of audit

Annual Governance & Accountability Return for the year ended 31 March 2026

Sections 20(2) and 25 of the Local Audit and Accountability Act 2014

Section 16 of the Accounts and Audit Regulations 2015 (SI 2015/234)

	Notes
1. The audit of accounts for Wickhambrook Parish Council for the year ended 31 March 2026 has been completed and the accounts have been published.	This notice and Sections 1, 2 & 3 of the AGAR must be published by 30 September. This must include publication on the smaller authority's website. The smaller authority must decide how long to publish the Notice for; the AGAR and external auditor report must be publicly available for 5 years.
2. The Annual Governance & Accountability Return including the auditor's certificate and opinion is available for inspection and copying by any local government elector of the area of Wickhambrook Parish Council on application to: (a) _____ _____ _____ _____ (b) _____ _____ _____	(a) Insert the name, position and address of the person to whom local government electors should apply to inspect the AGAR (b) Insert the hours during which inspection rights may be exercised
3. Copies will be provided to any local government elector of the area on payment of £____ (c) for each copy of the Annual Governance & Accountability Return.	(c) Insert a reasonable sum for copying costs
Announcement made by: (d) _____	(d) Insert the name and position of person placing the notice
Date of announcement: (e) _____	(e) Insert the date of placing of the notice

Wickhambrook Parish Council

Our ref SF0413**SAAA Ref** SB09407**Invoice No.** SB20260840**VAT No.** GB 440 4982 50**Email:** sba@pkf-l.com**Date:** 19 August 2026

INVOICE

Professional services rendered in connection with the following:

Limited assurance review of Annual Governance & Accountability Return for year ended 31 March 2026	£315.00
Additional charges (where applicable) as detailed on attached appendix A	£0.00
Additional fees (where applicable) as detailed by separate cover	£0.00
TOTAL NET	£315.00
VAT @ 20%	£63.00
TOTAL PAYABLE	£378.00

THIS IS A STATUTORY FEE WHICH MUST BE PAID. PAYMENT IS DUE ON RECEIPT OF INVOICE

The fees and charges are in accordance with the fee scales set by Smaller Authorities' Audit Appointments Ltd which can be found at <https://www.saaa.co.uk/audit-fees/>

**For payments by cheque, please return the remittance advice with your payment to:
PKF Littlejohn LLP, Credit Control (SBA), 30 Churchill Place, Canary Wharf, London E14 5RE**

For payments by credit transfer, our bank details are:-

HSBC Bank plc
Address: 1-3 Bishopsgate, London, EC2N 3AQ
Sort Code: 40-02-31
Account number: 11070797
Account Name: PKF Littlejohn LLP
Please include SF0413 or Wickhambrook Parish Council as the reference.

For account queries, contact sba@pkf-l.com

PKF Littlejohn LLP
30 Churchill Place
London
E14 5RE

T: +44 (0)20 7516 2200
www.pkf-l.com

Wickhambrook Parish Council

Our ref SF0413

SAAA Ref SB09407

Invoice No. SB20260840

VAT No. GB 440 4982 50

Email: sba@pkf-l.com

Date: 19 August 2026

REMITTANCE ADVICE

Professional services rendered in connection with the following:

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Account Name: PKF Littlejohn LLP
Please include SF0413 or Wickhambrook Parish Council as the reference.

For account queries, contact sba@pkf-l.com

Section 1 – Annual Governance Statement 2025/26

We acknowledge as the members of:

Wickhambrook Parish Council

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2026, that:

	Agreed		'Yes' means that this authority:
	Yes	No*	
1. We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	☒	☐	<i>prepared its accounting statements in accordance with the Accounts and Audit Regulations.</i>
2. We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	☒	☐	<i>made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.</i>
3. We have assured ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	☒	☐	<i>has only done what it has the legal power to do and has complied with Proper Practices in doing so.</i>
4. We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	☒	☐	<i>during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.</i>
5. We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	☒	☐	<i>considered and documented the financial and other risks it faces and dealt with them properly.</i>
6. We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	☒	☐	<i>arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.</i>
7. We took appropriate action on all matters raised in reports from internal and external audit.	☒	☐	<i>responded to matters brought to its attention by internal and external audit.</i>
8. We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements.	☒	☐	<i>disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.</i>
9. (For local councils only) Trust funds including charitable. In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	Yes	No	N/A
	☐	☐	☒
10. We have put in place arrangements for the effective IT and data management in accordance with proper practices during the year under review.	☒	☐	<i>has made suitable arrangements for its IT and data management and has complied with proper practices in doing so.</i>

*Please provide explanations to the external auditor on a separate sheet for each 'No' response and describe how the authority will address the weaknesses identified. These sheets must be published with the Annual Governance Statement.

This Annual Governance Statement was approved at a meeting of the authority on:

30/04/2026

and recorded as minute reference:

WPC.26.04.11.3

Signed by the Chair and Clerk of the meeting where approval was given:

Chair

Clerk

[Signature of Chair]
[Signature of Clerk]

<https://wickhambrook-pc.gov.uk/> ONLY AVAILABLE WEBSITE/WEBPAGE ADDRESS

Section 2 – Accounting Statements 2025/26 for

Wickhambrook Parish Council

	Year ending		Notes and guidance
	31 March 2025 £	31 March 2026 £	
1. Balances brought forward	20,174	18,806	<i>Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.</i>
2. (+) Precept or Rates and Levies	46,341	55,404	<i>Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.</i>
3. (+) Total other receipts	14,700	13,614	<i>Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.</i>
4. (-) Staff costs	17,825	19,425	<i>Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.</i>
5. (-) Loan interest/capital repayments	0	0	<i>Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).</i>
6. (-) All other payments	44,584	42,390	<i>Total expenditure or payments as recorded in the cashbook less staff costs (line 4) and loan interest/capital repayments (line 5).</i>
7. (=) Balances carried forward	18,806	26,008	<i>Total balances and reserves at the end of the year. must equal (1+2+3) - (4+5+6).</i>
8. Total value of cash and short term investments	18,806	26,008	<i>The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – To agree with bank reconciliation.</i>
9. Total fixed assets plus long term investments and assets	329,280	390,604	<i>The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.</i>
10. Total borrowings	0	0	<i>The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).</i>

For Local Councils Only	Yes	No	
11 Do the figures in the accounting statements above exclude any trust transactions?	☒	☐	<i>For guidance refer to the Practitioners' Guide sections 2.31 to 2.33.</i>

I certify that for the year ended 31 March 2026 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

Signed by Responsible Financial Officer before being presented to the authority for approval.

[Signature] 25.05.26

Date

24/04/2026

I confirm that these Accounting Statements were approved by this authority on this date:

30/04/2026

as recorded in minute reference:

WPC.26.04.11.4

Signed by Chair of the meeting where the Accounting Statements were approved

[Signature] 26/5/26

Section 3 – External Auditor’s Report and Certificate 2025/26

In respect of **Wickhambrook Parish Council – SF0413**

1 Respective responsibilities of the auditor and the authority

Our responsibility as auditors to complete a **limited assurance review** is set out by the National Audit Office (NAO). A limited assurance review is **not a full statutory audit**, it does not constitute an audit carried out in accordance with International Standards on Auditing (UK & Ireland) and hence it **does not** provide the same level of assurance that such an audit would. The UK Government has determined that a lower level of assurance than that provided by a full statutory audit is appropriate for those local public bodies with the lowest levels of spending.

Under a limited assurance review, the auditor is responsible for reviewing Sections 1 and 2 of the Annual Governance and Accountability Return in accordance with NAO Auditor Guidance Note 02 (AGN 02) as issued by the NAO on behalf of the Comptroller and Auditor General. AGN 02 is available from the NAO website – <https://www.nao.org.uk/code-audit-practice/guidance-and-information-for-auditors/>

This authority is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control. The authority prepares an Annual Governance and Accountability Return in accordance with *Proper Practices* which:

- summarises the accounting records for the year ended 31 March 2026; and
- confirms and provides assurance on those matters that are relevant to our duties and responsibilities as external auditors.

2 External auditor’s limited assurance opinion 2025/26

Except for the matters reported below, on the basis of our review of Sections 1 and 2 of the Annual Governance and Accountability Return (AGAR), in our opinion the information in Sections 1 and 2 of the AGAR is in accordance with Proper Practices and no other matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been

The AGAR was not accurately completed before submission for review:

- The smaller authority has not restated the prior year figure when revaluing assets in Section 2, Box 9. Please note that the Practitioners’ Guide allows smaller authorities to use any reasonable valuation method, provided that the prior year figure is restated for consistency and comparability.

Other matters not affecting our opinion which we draw to the attention of the authority:

None

3 External auditor certificate 2025/26

We certify that we have completed our review of Sections 1 and 2 of the Annual Governance and Accountability Return, and discharged our responsibilities under the Local Audit and Accountability Act 2014, for the year ended 31 March 2026.

External Auditor Name

PKF LITTLEJOHN LLP

External Auditor Signature

PKF LITTLEJOHN LLP

Date

19/08/2026

Appendix G of Report WPC.26.04.04

Section 1 - Financial Regulations and Standing Orders:

COMMENT: Council might wish to review the NALC Advice Note – Procurement, 3 February 2026 and ensure any applicable revisions are incorporated at the next annual review²

Section 2 - Budgetary Controls:

COMMENT: to ensure transparency in the budgetary process Council might wish to evidence by recording within the minutes, the budget being set alongside the reasoning for such a budget.

COMMENT: in accordance with best practice, council might wish to record in the minutes the precept being set and the impact that this would have on a Band D Dwelling in monetary as well as percentage terms³

Additional comments: Council has followed the recommended key stages as to the budgetary process for the year:

- decide the form and level of detail of the budget;
- review the current year budget and spending;
- determine the cost of spending plans;
- assess levels of income;
- bring together spending and income plans;
- provide for contingencies and consider the need for reserves;
- approve the budget;
- confirm the precept and
- review progress against the budget regularly throughout the year

Section 3 - Proper Bookkeeping:

Comment: It is noted that it is the RFO's intention to move all accounting to Scribe Accounts in the next financial year (the software already being in use for Cemeteries). Scribe will provide a suite of tools to allow for reporting on a Receipts and Payments basis. This would allow the automation of the council's transactions as well as for the production of reports and financial statements.

Comment: The RFO has shown best practise by ensuring, for further transparency and scrutiny, that all payments and receipts are referenced with a description as to the income and expenditure being incurred to ensure the integrity of data being input and processed.

Additional comments: Council might wish to ensure that the cashbook and/or minutes make reference to the powers used to incur expenditure. Statutory powers are granted by Parliament and give local councils the choice or opportunity to take action and are therefore discretionary. Like all powers given to public bodies the powers of local councils are defined in detail in legislation and these details may include a requirement to obtain the consent of another body. Local Councils must exercise their powers subject to the provisions of the general law.⁴

Section 4 - Payment Controls:

Comment: There is clear evidence of good practice - payments are checked by two councillors against invoices and online authorisation is then completed demonstrating the council is working in line with its own Financial Regulations. A schedule of both due and retrospective regular payments is submitted to the Council for approval at each meeting. This is also published on the Council's website.

² This was noted under clerk's report at the February meeting (Min. 26.04.10.12) and is scheduled.

³ The clerk will note this and make provision for amounts and reasoning to be included directly in the minutes at the January meeting. The impact on a band D dwelling in monetary and percentage terms has been included in the reports.

⁴ This has always been recorded in the reports, but with the migration to scribe, will be recorded directly within the accounting package moving forwards.

Section 8 - Payroll Controls:

Comment: Council has noted the requirement to ensure that it formally approves amendments to any employee's pay, emoluments, or terms and conditions of employment.

Section 9 - Year End Procedures:

Comment: within the Annual Internal Audit Report, internal control objective test M requires the internal auditor to establish whether the parish council correctly provided for the exercise and published a copy of the required "Public Notice" by ensuring that it clearly identified the statutory 30 working day period when the Authority's records are available for public inspection. This is evidenced by the notice on the website which contains the period for the exercise of public right; details of the manner in which the documents can be inspected; the name and address of the external auditor and the provisions as contained under section 25 and section 27 of the Act.

Comment: Council might wish to note that there is a requirement to ensure that Sections 1, 2 and 3 are published and remain available for public access for a period of not less than 5 years from the date of publication.⁵

Section 10 - Risk management:

Comment: Council has in place monitoring documents which identify the risks involved and the potential for improvements to its arrangements to protect public money. It provides the opportunity for reviews of operational as well as financial and governance reviews by members to ensure that it has mitigation measures in place to address the risks associated with the council's day to day operations.

Comment: Council has followed recommended guidance by ensuring that its Fidelity Cover is equal to at least the sum of the year-end balances plus 50% of the precept/grants to be received in the following April.

Comment: Council has ensured that it is able to demonstrate that it has reviewed the risks facing the Council in transacting its business and has taken out appropriate insurance to manage and reduce the risks relating to property, cash and legal liability (amongst other things).

Comment: Council continues with the good practice of appointing a councillor(s) to review the system of internal control via specific tests and as such has demonstrated that it has understood the requirements to have in place safe and efficient arrangements to safeguard public money.

Additional comments: By reviewing the terms of reference for internal audit the council has followed guidance and demonstrates it recognises that the internal audit function is to test and report to the authority on whether its specific system of internal control is adequate and working satisfactorily.

Section 12 - Assertion 10:

Comment: Under the Freedom of Information Act 2000, public authorities must provide access to information held which must be published proactively. The Freedom of Information Act requires every public authority to have a publication scheme and to publish information covered by the scheme. Council should seek to review the information it holds under its scheme and ensure that it is up to date and ensure that it is available to view on its website. There were no formal recommendations requiring action on the part of either the Council or the Council's Responsible Finance Officer.

Comment: The Privacy Policy on the Parish Council's website covers the framework that the public can expect for dealing with requests from individuals who have the right to know what data is held on them, why the data is being processed and whether it will be given to any third party.

⁵ The council does publish all parts of AGAR under each accounting year on the website.

Comment: To achieve best practice, councils are recommended to:⁶

- Carry out data protection audits, mapping personal data being processed and carrying out data risk assessments.
- Provide regular data protection compliance training for council staff and councillors.

Comment: Council might wish to review its provisions and consider whether it might be able to work towards ensuring compliance with the requirements of publishing the following data on its website in accordance with the required timescales:

*Publish quarterly:*⁷

- Invitations to tender for contracts over £5,000;
- Details of contracts that exceed £5,000.

Publish annually:

- Details of all land and building assets;⁸
- Grants to Voluntary, Community and Social Enterprise Organisations;⁹
- Organisational Chart.¹⁰

Comment: To demonstrate that the website is reviewed at least annually Council may wish to consider noting the date the last review was completed on the Accessibility Statement.¹¹

Comment: this ensures that sensitive information is handled in a controlled environment with appropriate security measures. This aligns with GDPR principles such as data minimisation, integrity and confidentiality. Authority-owned email accounts provide a clear record of communications, which is essential for transparency and accountability. This helps in maintaining an audit trail and ensures all council-related communications are accessible for review if needed and makes Data Subject Access and Freedom of Information Requests easier to manage.

Section 13 – Internal Audit

Comment: Council has understood the requirement to ensure that it has a clear understanding of the roles and responsibilities for internal audit, audit planning and timing of visits, reporting requirements; access to information; period of engagement and remuneration.

⁶ These will be introduced

⁷ Publish invitations to tender and details of contracts over £5000 quarterly

⁸ This is reported at the May meeting – will be published under the financial docs for each year

⁹ This has been reported at the April meeting for the past three years – will also be published under the financial docs for each year

¹⁰ An organisation chart will be produced and published

¹¹ The Accessibility Statement will be updated

Appendix E

Type of Data	Why it is collected	Where it comes from	Who it is shared with	Lawful basis for processing - see below	Consent obtained	How it is protected
Electoral Roll	For Council use only. Details of names and addresses of electorate	West Suffolk	Clerk only for PC business		Not required	computer - password protected - only printed if required and then shredded.
Letters from residents	Queries or complaints from residents	Residents	Clerk and councillors	Public interest		Stored on password protected parish council computer.
Emails from residents	Queries or complaints from residents	Residents	Clerk and councillors	Public interest		Stored on clerk's laptop which is in her locked home. Laptop is password protected as are the council internet accounts. The laptop has a firewall and anti-virus software and the laptop is updated regularly
Contact database (names, address and telephone numbers of councillors and other village organisations which are already in the public domain)	To share information with residents	Councillors and other village organisations (not contact details of individuals)	Clerk only	Public interest	Not required for councillors or charities	Stored on clerk's laptop (see above)
Clerk's employment details	For contract of employment	Clerk	Clerk and councillors	Contractual necessity		Stored in locked office in clerk's home
Job applications, CV's	To appoint new staff	None at present		Consent		
Complaints and reporting issues	To deal with complaints	None at present		Public interest		
Grant applications	To apply for grant funding	Various organisations	Clerk and councillors	Public interest	Not required as public organisations	Stored on clerk's laptop (see above) or in clerk's locked office
Planning applications	To enable the Council to respond to planning application consultations	West Suffolk	Clerk and councillors	Public interest		Stored on clerk's laptop (see above)
Contracts with individuals and organisations	To carry out the Council's legal role e.g grass cutting	Individuals or organisations	Clerk and councillors	Contractual necessity		Stored on clerk's laptop (see above)
Communications with third parties (SCC, West Suffolk, HMRC, Charities, SALC, LCPAS, village organisations)	Sharing of information	Third party organisations	Clerk and councillors	Public interest	Not required as public organisations	Stored on clerk's laptop (see above)
Grave Deed holder details	To administer grave spaces in cemetery	Allotment holders	Clerk	Compliance with a legal obligation		Stored securely in clerk's home and on clerk's laptop
Email addresses	To communicate with residents in response to queries or complaints	Residents	Clerk only	Public interest		Stored on clerk's laptop (see above)
IP address	To communicate with residents in response to queries or complaints	Residents	Clerk only	Public interest.		Stored on clerk's laptop (see above). Clerk no longer forwards on personal emails but saves them and sends them as an attachment or copies and pastes information from the email
Purchase history	Purchases from suppliers	Companies	Clerk and councillors	Contractual Necessity	Not required as companies not covered by GDPR	
Downloads	For information to enable Council to carry out its role	Various	Clerk only	Public interest.		Stored on clerk's laptop (see above)
Pay and PAYE information	To enable Council to carry out its role as an employer	Clerk	Clerk and councillors	Contractual necessity		Stored on clerk's laptop (see above)
Financial information /history	To enable Council to carry out its role	Various	Clerk and councillors	Compliance with a legal obligation		Stored on clerk's laptop (see above)
Suppliers contracts	To enable Council to carry out its role	Various	Clerk and councillors	Contractual necessity	Not required as companies not covered by GDPR	
Subscription Services	To enable Council to carry out its role	Various	Clerk and councillors	Contractual necessity	Not required as companies not covered by GDPR	
Wickhambrook Parish Newsletter	Sharing of information	Residents	No one	Consent	No personal information is included in the newsletter reports	Password protected software accessed through clerk's secure laptop
Website	Sharing of information to enable council to carry out its role and comply with the transparency code	Various	Everyone	Public interest	Yes if information about a member of public is published on the website, but no information is published at present	Stored on clerk's laptop (see above)
Newsletter report	Sharing of information	Various	Residents of different parishes	Public interest	No personal information is included in the newsletter reports	Stored on clerk's laptop (see above)
Agendas and minutes	Sharing of information about Council's activities to comply with its legal obligations and the Transparency Code	Produced by the clerk	Councillors and residents via noticeboards and website	Public interest	No personal information is included in the agendas or minutes	Stored on clerk's laptop (see above) or in minutes folders which are kept at the clerk's home

Lawful bases for processing data

Consent – must be explicit and freely given
Contractual – a legal contract
Compliance with a legal obligation. Data may be processed if the controller is legally required to perform such processing. E.g. complying with the requirement of legislation

Vital Interest - share the data or when a person could be seen at risk eg: safeguarding

Public interest. Personal data may be processed if the processing is necessary for the performance of tasks carried out by a public authority acting in the public interest. A lot of council work will be around public tasks, receiving personal data due to complaints or planning
Legitimate interest

Organisational Chart of Wickhambrook Parish Council

The legislation requires the publication of an organisation chart covering staff in the top three levels of the organisation which should exclude staff whose salary does not exceed £50,000. *In light of financial transparency and ensuring that all data held by the parish council is made available to local people the following is published:*

Organisation chart

Section 44 produces information which must be published and the timescales for publication. Annual publication - Publish an organisation chart covering staff in the top three levels of the organisation. The following information must be included for each member of staff included in the chart:

- grade
- job title
- local authority department and team
- whether permanent or temporary staff
- contact details
- salary in £5,000 brackets, consistent with the details published for Senior Salaries
- salary ceiling (the maximum salary for the grade)

2025-2026

Grade	Job Title	Department	Perm/Temp.	Contact Details	Actual Salary Scale
11 - 20	Clerk/RFO	Administration	Permanent ¹²	3 Farriers Close, Great Barton, Bury St Edmunds IP31 2FP	£28,142 - £32,597

Pay Multiple

Section 52 provides details as to the information that must be published under this section.

The code requires that local authorities must publish the pay multiple on their website, defined as the ratio between the highest paid taxable earnings for the given year (including base salary, variable pay, bonuses, allowances and the cash value of any benefits-in-kind) and the median earnings figure of the whole of the authority's workforce.

The measure must:

- Cover all the elements of remuneration that can be valued
- Use the median earnings figure as the denominator, which should be that of all employees of the local authority on a fixed date each year, coinciding with reporting at the end of the financial year
- Exclude changes in pension benefits, which due to their variety and complexity cannot be accurately included in a pay multiple disclosure.
- These calculations include part-time employees salaries as full time equivalents not pro rata.

Thurston Parish Council's pay multiple as at 31 March 2025 is 1.0095

Trade Union

Section 45 provides details as to the information that must be published in relation to time spent on trade union facility time:

For the year 1 April 2024 - 31 March 2025 – no time was spent by authority staff on trade union activities.

For the year 1 April 2025 - 31 March 2026 - no time was spent by authority staff on trade union activities.

¹² FTE 0.54

Handling Data Protection Complaints: What Councils Need to Know



BREAKTHROUGH
COMMUNICATIONS
SPECIALISTS IN CONNECTING COUNCILS WITH THEIR COMMUNITIES

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Data Protection Complaints: At A Glance

- A new requirement to have a data protection complaints process came into force on 19th June 2026.
- Councils **must** have a process for handling data protection complaints.
- Many existing complaints procedures may already meet requirements.
- We've created a flowchart and template policy to help you.

The Data (Use and Access) Act 2025 introduces new requirements for how organisations should handle data protection complaints.

These requirements took effect on 19th June 2026. If you're wondering what this means for your council, don't worry.

For many councils, the changes may be less significant than they first appear, particularly where an existing complaints process is already in place.

The key requirement is that individuals must have a way to raise concerns about how their personal data has been handled, and councils must have a process for dealing with these concerns appropriately.

Many councils may already have arrangements in place through their existing complaints procedures.

The important thing is understanding what a data protection complaint is, what process you should follow when one is received, and whether your current arrangements meet the new requirements.

To help, we've created:

- This **guide** explaining the new requirements and what they mean for councils
- A [practical flowchart](#) showing the stages of handling a data protection complaint.
- Breakthrough Communications customers get access to a [Model Template Data Protection Complaints Policy](#) that councils can adapt to suit their own arrangements.

Start by reviewing what you already have

The legislation does not require councils to create a brand-new standalone complaints procedure. A documented process is not a legal requirement, but many councils may find one helpful to demonstrate their approach, support consistency and provide clarity for officers and councillors.

Councils should consider whether their existing arrangements already meet the new requirements. Check the following:

- ☐ **Can individuals raise concerns about how their personal data has been used by the council?**
- ☐ **Are complaints acknowledged within 30 days?**
- ☐ **Is there a process for investigating those complaints?**
- ☐ **Are complainants kept informed?**
- ☐ **Is a clear outcome provided within 30 days?**

If your existing complaints procedure already covers these areas then you don't need to do anything, if they don't quite match then you may only need to make minor adjustments.

What counts as a Data Protection Complaint?

A data protection complaint is a complaint about how the council has processed an individual's own personal data or how it has responded to a request they have made under UK GDPR.

For example, this could include concerns about how personal data has been collected, used, shared, stored, retained or corrected, or dissatisfaction with the way a Subject Access Request or other UK GDPR rights request has been handled.

A data protection complaint is **not** someone making a another type of complaint while exercising a UK GDPR right. For example, an employee may raise a grievance while requesting copies of their personal information (a Subject Access Request). This is not a data protection complaint in itself. It would only become one if the employee later complained about your processing or response to the Subject Access Request. To make a complaint, the individual must be directly affected. A person cannot make a complaint solely on the basis that they have become aware of, or object to, the way another individual's personal data has been used.

Understanding different types of complaints

Sometimes the biggest challenge is that complaints don't arrive neatly labelled. Councils often receive correspondence that covers multiple issues at the same time.

Before deciding how to respond, it is important to identify the type of complaint being made, as different processes apply to different concerns.

Data Protection Complaint	FOI Complaint	Any Other Complaint
A complaint about how the council has processed someone's personal data or responded to a request made under the UK GDPR.	A complaint about how the council has handled a request for information made under the Freedom of Information Act 2000.	Any other complaint that does not relate to the handling of personal data or a Freedom of Information request.
This includes complaints about the collection, use, sharing, storing, retention or accuracy of their own personal data, as well as responses to rights requests they have made, such as Subject Access Requests, Right of Erasure, or Right to Rectification.	This includes complaints about delays, refusals, exemptions applied or the information provided in response to the FOI request.	This includes, for example, complaints about council services, decisions, facilities, projects or other operational matters.
Example: "I do not think you have provided all my personal information in response to my Subject Access Request."	Example: "I disagree with your decision to withhold information under an FOI exemption."	Example: "I am unhappy with the maintenance of the council-owned play area."
Follow the data protection complaints process	Conduct an internal review in line with ICO guidance and the Section 45 Code of Practice.	Follow your normal council complaints procedure.

Once you have identified that a matter is a data protection complaint, the next step is to follow an appropriate complaints process. Our [flowchart](#) provides a practical step-by-step guide.

What does an effective data protection complaint process look like?

The legislation gives councils flexibility in how they handle data protection complaints. However, every council should have a process that enables it to:

- Receive data protection complaints.
- Acknowledge complaints within 30 days.
- Make appropriate enquiries into the issues raised.
- Investigate complaints without delay.
- Keep complainants informed of progress where appropriate.
- Communicate the outcome clearly and without delay (usually within 30 days).

If your existing complaints process already covers these areas, you may not need to change anything. If you do not currently have suitable arrangements in place, our **Data Protection Complaints Policy Template** provides a practical starting point.

Supporting arrangements

Alongside the complaints process itself, councils should consider whether they have appropriate supporting arrangements in place.

Councils might want to check:

- ☐ Is it clear who should receive and handle data protection complaints?
- ☐ Can complaints be recognised regardless of how they are received including, verbally, by email, in writing, or via social media?
- ☐ Does your privacy notice explain how individuals can raise data protection concerns?
- ☐ Do responses to Subject Access Requests and other UK GDPR rights requests explain how an individual can complain?
- ☐ Do individuals know that they can complain to both the council and the Information Commissioners Office (ICO)?
- ☐ Do you keep a record of complaints and any actions taken?
- ☐ Have officers and councillors received appropriate data protection training?
- ☐ Is there a process for identifying lessons learned and making improvements where appropriate?

Remember: The aim is not to create unnecessary bureaucracy. For many councils, compliance may simply involve reviewing and refining arrangements that already exist.

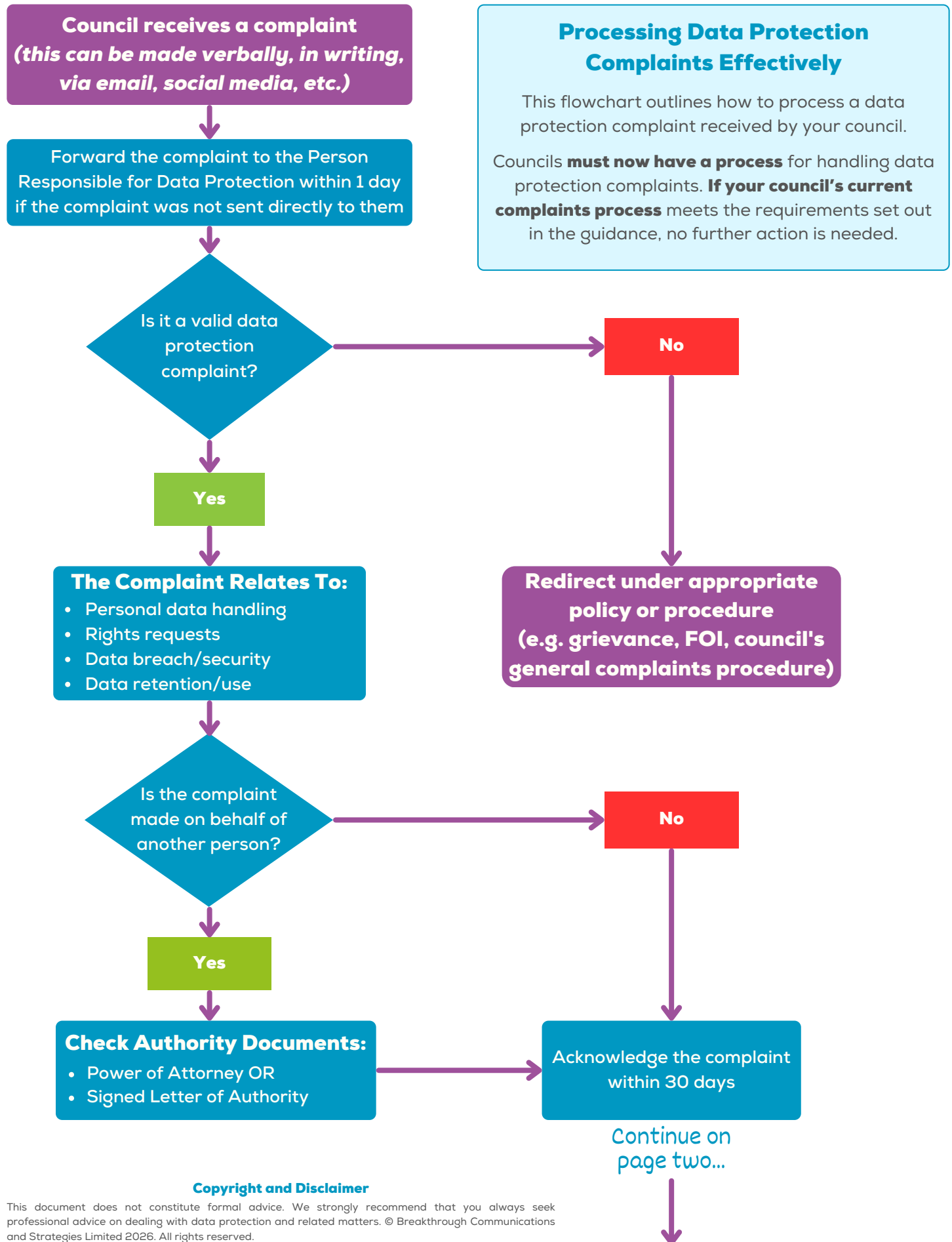
Additional Resources

Data Protection Complaints Flowchart: A practical guide to the stages involved in handling a data protection complaint, from receipt to outcome and lessons learned.

Data Protection Complaints Policy Model Template : A template policy councils can adapt to support their own arrangements and demonstrate compliance with the new requirements. This is available for Breakthrough Communications customers to download at: <https://hive.breakthroughcomms.co.uk/>.

Breakthrough Communications

Data Protection Complaints Process



Important Note

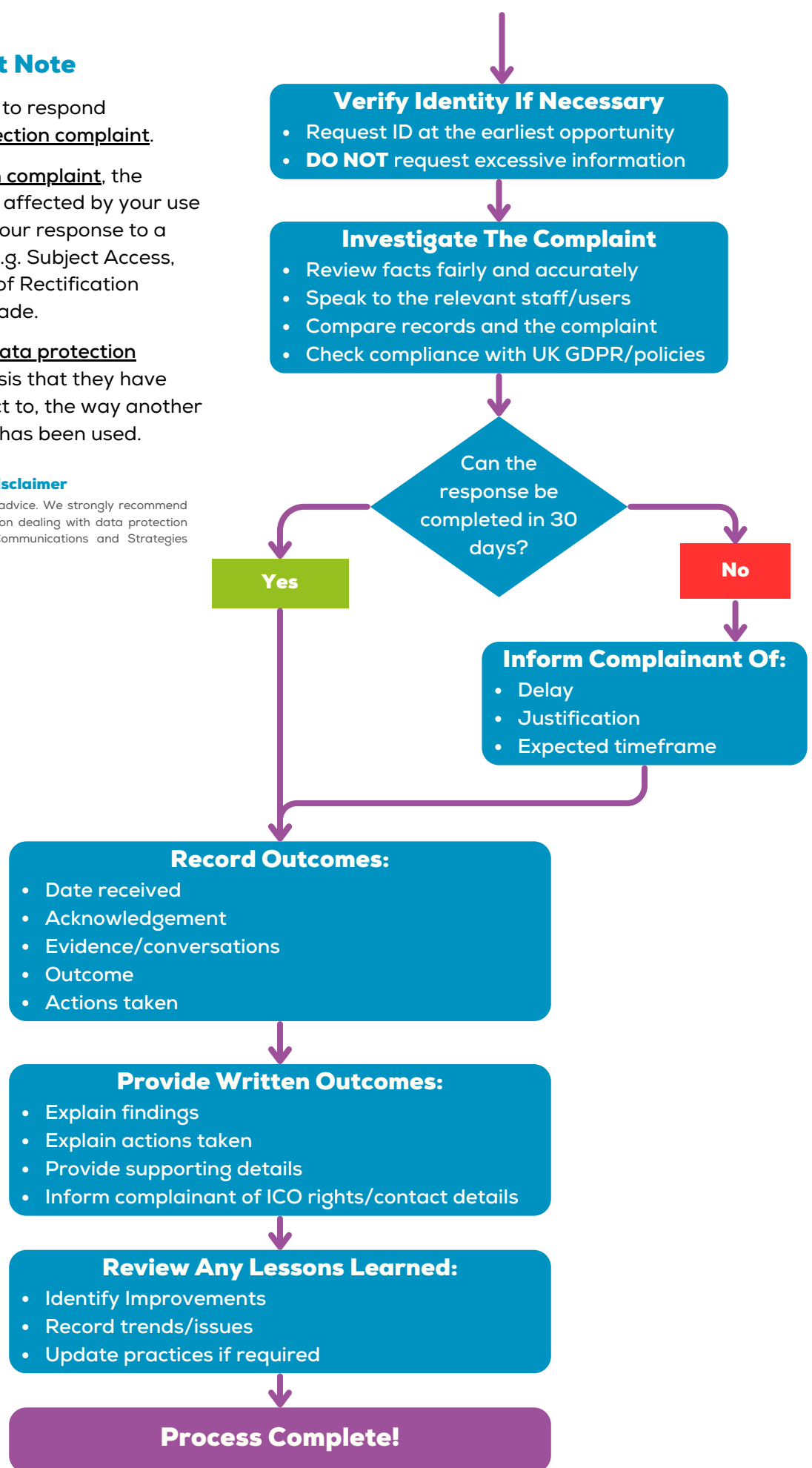
This flowchart covers how to respond specifically to a data protection complaint.

To make a data protection complaint, the individual must be directly affected by your use of their personal data or your response to a data protection request (e.g. Subject Access, Right of Erasure, or Right of Rectification request) that they have made.

A person cannot make a data protection complaint solely on the basis that they have become aware of, or object to, the way another individual's personal data has been used.

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Information Compliance, without the stress.**

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SPECIALISTS IN CONNECTING COUNCILS WITH THEIR COMMUNITIES

Ongoing Support by Breakthrough Communications

We help parish and town councils move from reactive problem solving to confident, trusted local leadership.

Dear Clerk and Councillors,

Your council does important work, often across a wider range of responsibilities than people realise.

Communicating with residents, engaging your community and managing information well are ongoing responsibilities. They change as your council changes, as expectations grow and as new challenges arise.

Some days the work is reactive. A challenging FOI or Subject Access Request, or advice during a data breach. The press on the phone, or a reputational or community engagement challenge. Other days it is proactive. Best practice, getting data protection right, building trust with your community.

Ongoing Support by Breakthrough Communications brings advice, training, tools and specialist expertise together in one place. It helps you tackle the challenge in front of you and agree a practical way forward. And it builds your council's confidence and capability for whatever comes next.

We would love to show you how it could work for your council.

With warm regards,

The Breakthrough Communications Team

NALC

National Partner

1,412

People trained in 2025

300+

Councils helped

170+

Trustpilot reviews

Six ways ongoing support makes your council stronger

Support that deals with today's challenge and builds strength for the next one.



Stop problems before they escalate

Most challenges start small. A comment on Facebook, a tetchy email, a rumour taking hold. Act early and a quick conversation keeps small issues small.



One team, every angle

Challenges never arrive in neat boxes. A complaint sparks an FOI, and a project lights up the village Facebook group. One team covers communications, engagement, relationships and information rights together.



Confidence to get it right first time

So much of the job is quiet worry. Is this the right response, and can we publish that? Trusted expertise behind you means you stop second-guessing yourself.



Resilience through hostility, conflict and change

Sometimes it stops being routine and starts feeling personal. Complaint campaigns, weaponised information requests, hostile public meetings. We help you respond calmly, protect trust and support the people doing the work.



Experts on tap, not on the payroll

Few councils can employ communications, engagement and data protection specialists in-house. Ongoing Support gives you the whole specialist team for a fraction of one salary.



Time and effort saved, stronger as you grow

Templates ready to adapt. Straight answers, first time. Every answer stays with your council, so knowledge builds and next year gets easier.

What's included

Everything is designed around the realities of parish and town council life.



The Breakthrough Hub

On-demand training, templates, decision guides and ready-to-use resources, available 24/7. New tools added throughout the year.



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It is hard to see your own work clearly when you deal with it every day. Our Healthchecks give your council an independent view and a practical direction for the year.



HEALTHCHECK ONE

Communications and Engagement

- ✓ Strategy and channel mix
- ✓ Social media presence and tone
- ✓ Press and media handling
- ✓ Consultation and survey design
- ✓ Councillor visibility in the community



HEALTHCHECK TWO

Data Protection

- ✓ Processing activities and lawful bases
- ✓ Policies and privacy notices
- ✓ SAR handling and breach readiness
- ✓ Staff and councillor awareness
- ✓ AGAR Assertion 10 readiness

Your output

A bespoke SWOT analysis and a written action plan from our team.

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per year

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EVERYTHING INCLUDED

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per year

Maximum support for councils that want everything included, all year round.

The Breakthrough Hub Communications, data protection and FOI resources	✓	✓	✓
Monthly bulletins Legal updates, guidance and sector best practice	✓	✓	✓
Annual Healthchecks Structured reviews with a report and action plan	Self-serve	Two, reviewed	Two, reviewed
Training events Live virtual training across the year	Core	Core and advanced	UNLIMITED tickets to all our Officer and Councillor Training events
Masterclasses Focused deep dives, with recordings	Paid add-on	Selected	UNLIMITED tickets to all our Officer and Councillor Masterclasses
1-2-1 advice calls Direct expert advice from our team	2 per year	5 per year	UNLIMITED
Bespoke training A session designed just for your council	Discounted	Discounted	One bespoke training session per year, worth £495

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- **Are we tied in for several years?**

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- **What if we need more in-depth help on a project?**

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How we support local councils like yours:

Hi there, we're Breakthrough Communications. We specialise in helping parish and town councils communicate and engage more effectively with their communities, and to do so in a more compliant way.

We're the UK's leading supplier of communication, community engagement and information governance support and services to local councils.

Our team has decades of combined professional experience in the world of communications and community engagement, as well as information governance. Many of our team have also served as councillors and clerks.

This means that, as well as understanding the importance of effective community engagement, council communication and information governance compliance, *we also have unique insight into the world of parish and town councils.*

Over the years our customers have included the Local Government Association, the National Association of Local Councils, many County Associations of Local Councils and hundreds of parish and town councils across the country.

In summary, we're passionate about helping and supporting local councils of all shapes and sizes.

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- A unique communications and compliance support service for local councils, Council Hive provides unlimited access to on-demand training and learning, tools and toolkits, as well as professional support covering all aspects of local council communications, community engagement and GDPR/FOI compliance. We're here, whenever your council needs us.

Done-for-you services

- From creating communication strategies to carrying out consultations and surveys, we can assist your council with any aspect of its community engagement and communications.
- From advising on GDPR/FOI compliance matters, to carrying out council-wide data protection compliance reviews, we can ensure your council stays compliant with latest information governance legislation.

Training, Workshops and Events

- We deliver virtual and in-person workshops and training courses in a range of technical and soft skill subjects covering all aspects of communications, community engagement and information governance compliance.
- We also run online and in-person events throughout the year designed exclusively for parish and town councils.