**Nacton Parish Council**

**Internet Banking Policy**

**Background**

The Legislative Reform (Payments by Parish Council, Community Councils and Charter Trustees) Order 2014 came into effect on 12th March 2014. This legislative Reform order repealed the statutory requirement for two elected members to sign cheques and other orders for payment.

The removal of this particular legal requirement enables Parish Councils to take an overall approach to how it controls its money as well as taking advantage of modern technology including internet banking. Nacton Parish Council acknowledges the need to maintain robust controls on payments as an integrated part of its overall financial control system and the Internet Banking Policy will form part of its Financial Regulations.

**Bank Account Overview**

Nacton Parish Council currently have two accounts open with Lloyds Bank.

* Treasurer’s Account is maintained for day-to-day transactions and has both cheque book and online banking payment options available.
* Business Banking Instant Account is for Reserve funds.

Cheques can be signed by any two of the authorised signatories.

Online payments can be authorised by any one of the authorised signatories.

**Procedures for Payment Authorisation**

In general, all payments are listed in the Nacton Parish Council Meeting Agenda which is distributed to all Councillors and the RFO ahead of each meeting by the Parish Clerk.

At the Parish Council Meeting, the list of payments is reviewed and either approved or rejected. All items will appear in the Meeting Minutes prepared by the Parish Clerk post-meeting.

All payments approved at the meeting are passed to the RFO for action using either cheque or the online payment service.

Any payments requiring approval after the Meeting Agenda has been circulated can be:

* Discussed at the Meeting and added to the Minutes, or
* The RFO can email all Councillors requesting authority to make a payment (giving five days notice before the intended payment date). At least three Councillors are required to authorise the payment, before any action can be taken by the RFO

**Procedures for Bank Statement Audit**

At each Parish Council Meeting, the RFO will provide paper copy bank statements covering all financial transactions since the last Parish Council Meeting. The statements will be annotated with details for each Receipt and Payment.

Supporting documentation will be included for each item.

The Chairman/Vice Chair and one other Councillor will sign and date the bank statements to acknowledge they have reviewed each transaction.

The Chairman/Vice Chair and one other Councillor will also sign and date each supporting document for all Payments listed on the bank statements.

The RFO will store all signed statements and supporting documentation which will be presented to the Internal Auditor for the Year End Audit.

**Procedures for Cash Book Review**

Ahead of each Parish Council Meeting, the RFO will circulate by email the Cash Book in Excel workbook format to all Councillors and the Parish Clerk. This workbook includes Cash Book for the Treasurer’s Account, Cash Book for the Reserve Account, Treasurer’s Account expenditure breakdown, Budget Overview for current year, Expenditure over £100 schedule and Income List.

The RFO reconciles the Cash Book spreadsheets to the bank account statements on a regular basis.

The RFO receives Bank Statements in the post on a monthly basis and Online access can be utilised to review all financial transactions intra-month.

The RFO can also use the Lloyds Bank mobile phone App if any urgent issues require attention and there is no access to a PC/Laptop.

**Procedures for Risk Management of Online Banking activity**

Following the Internal Auditor report for the financial year ended 31st March 2023 and specifically Recommendation 4, the Council discussed the Control Framework around single authorisation for online payments at the Parish Council AGM on 24th May 2023.

It was agreed that no change was required for the single authority process currently in place (and detailed above). This works for a small Parish Council such as Nacton and the size/type of transactions undertaken.

However, it was agreed that monitoring processes should be reviewed by the Financial Advisory Group and their recommendations presented to the Full Council at the July 2023 Parish Council Meeting.

The following enhancements were agreed and have been implemented with immediate effect:

* All Financial Advisory Group members should have Online Banking access enabled, to allow spot checks to be carried out intra-month. The RFO will respond to all questions within a reasonable timeframe.
* The Parish Clerk should have Online Banking access enabled to allow a fortnightly review of the bank statements. The RFO will respond to all questions within a reasonable timeframe.
* The RFO will circulate copy bank statements every two weeks to all Councillors and the Parish Clerk and respond to all questions within a reasonable timeframe.
* The above procedures ensure continuous oversight of all transactions across the Parish Council bank accounts and enhances the risk management policy already in place.

Adopted by the Nacton Parish Council at the Parish Council Meeting held on 12th July 2023