

Audit of Accounts Report – Brecon Beacons National Park Authority

Audit year: 2020-21

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We currently intend to issue an unqualified audit report on your 2020-21 Statement of Accounts. There are some issues to report to you prior to their approval.

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Audit of accounts report

Introduction

- 1 This report summarises the main findings from our audit of your 2020-21 Statement of Accounts (the accounts). We have discussed the findings with the relevant officers.
- 2 Auditors can never give complete assurance that accounts are correctly stated. Instead, we work to a level of materiality. The level of materiality is set to try to identify and correct misstatements that might otherwise cause a user of the accounts into being misled. We have set the level at £125,700 for this year's audit.
- 3 Further to the above materiality, there are some areas of the accounts that we judge to be of more importance to the reader, for which we have set a lower materiality level. This year our lower materiality levels are as follows:
 - £1,000 for senior officers' remuneration, pension and any exit packages; and
 - £5,000 for related party transactions and balances relating to senior officers and members, and their close family.
- 4 We have substantially completed this year's audit.
- 5 In our professional view we have complied with the ethical standards that apply to our work. We remain independent of yourselves, and our objectivity has not been compromised in any way. There are no known relationships between us and yourselves that we believe could undermine our objectivity and independence.

Impact of COVID-19 on this year's audit

- 6 The COVID-19 pandemic has continued to have a significant impact on all aspects of our society. You have a statutory requirement to prepare annual accounts and it is testament to the commitment of your officers that you have succeeded in doing so for a second year, in the face of the challenges posed by COVID-19. We are grateful for the professionalism of the many officers who enabled us to complete the audit.
- 7 COVID-19 has continued to affect our audit and we summarise the main impacts in **Exhibit 1**. The exhibit is provided for information purposes only, to help you understand COVID-19's impact on this year's audit process.

Exhibit 1 – impact of COVID-19 on this year’s audit

Timetable	<ul style="list-style-type: none">• The statutory deadline for the preparation of the draft 2020-21 accounts (signed by the responsible finance officer) was 31 May 2021; and the statutory deadline for audit certification by the Auditor General was 31 July 2021.• The draft accounts were signed and submitted for audit on 30 June 2021. As statutorily required, the Park Authority published a statement on its website to explain the delay beyond the statutory deadline, explaining that it had arisen for a second year due to COVID-19.• The audited accounts are scheduled to be certified by the Auditor General on 30 November 2021, being later than the statutory certification deadline of 31 July.• However, it is important to note that for a second year the Welsh Government’s Finance Department wrote to all local government bodies advising them that, due to the impact of COVID-19, they could submit signed draft accounts by 31 August and have them audited and certified by 30 November.• You have therefore produced your 2020-21 accounts ahead of the Welsh Government’s deadline of 31 August; and they are scheduled to be certified on 30 November.
Electronic signatures	<p>Should your audited accounts be approved by the Park Authority on 26 November 2021, this year we are again accepting electronic signatures and the electronic transfer of the e-signed accounts to us. Management has agreed to use this basis again. The Auditor General’s certification will also be by electronic signature for a second year.</p>
Audit evidence	<p>For a second year we received all audit evidence in electronic format. This access has enabled us to undertake the audit while not at your offices. Where we have been unable to use our usual audit methodology, such as our physical inspection of your property, plant and equipment, we applied alternative audit means where necessary to obtain sufficient audit evidence.</p>

Proposed audit opinion

- 8 We intend to issue an unqualified audit opinion on the 2020-21 statement of accounts, once you have provided us with a Letter of Representation based on that set out in **Appendix 1**. We issue a ‘qualified’ audit opinion where we have material concerns about your accounts; otherwise, we issue an unqualified opinion.

- 9 The Letter of Representation contains certain confirmations that we need to obtain from you under auditing standards. Our proposed audit report is set out in **Appendix 2**.

Significant issues arising from the audit

Uncorrected misstatements

- 10 We can confirm that there is one uncorrected non-trivial misstatement. Management has corrected all other non-trivial misstatements that we found.
- 11 The uncorrected misstatement relates to a debtor that in respect of the provision of services through to September 2023. Part of the debtor, totalling £11,985, was due after more than one year, as at 31 March 2021. The £11,985 is therefore a long-term debtor as at 31 March 2021, but is incorrectly disclosed as a short-term debtor. The misstatement is a classification error within the balance sheet.

Corrected misstatements

- 12 There were misstatements in the draft accounts that management has corrected. However, we consider that they should be drawn to your attention and they are therefore set out with explanations in **Appendix 3**.

Other matters

- 13 While our audit has progressed reasonably well, some significant matters have arisen and the audit has taken longer than planned. The audit has therefore required additional audit resource. Once we have concluded all our 2020-21 financial audit work, we will discuss the audit fee with the Section 151 Officer and report any additional fee to the Audit and Scrutiny Committee.

Recommendations

- 14 Our audit recommendations are set out in **Appendix 4**. Management has responded to them and we will follow up their actions as part of next year's audit

Appendix 1

Letter of representation

[Required to be on the Park Authority's letterhead]

Auditor General for Wales
Audit Wales
24 Cathedral Road
Cardiff
CF11 9LJ

26 November 2021

Representations regarding the 2020-21 financial statements

This letter is provided in connection with your audit of the financial statements of Brecon Beacons National Park Authority (the Park Authority) for the year ended 31 March 2021. It is provided for the purpose of expressing an opinion on their truth and fairness and their proper preparation.

We confirm that to the best of our knowledge and belief, having made enquiries as we consider sufficient, we can make the following representations to you.

Management representations

Responsibilities

We have fulfilled our responsibilities for:

- the preparation of the financial statements in accordance with legislative requirements and Code of Practice on Local Authority Accounting in the United Kingdom; in particular the financial statements give a true and fair view in accordance therewith; and
- the design, implementation, maintenance and review of internal control to prevent and detect fraud and error.

Information provided

We have provided you with:

- Full access to:
 - all information of which we are aware that is relevant to the preparation of the financial statements such as books of account and supporting documentation, minutes of meetings and other matters;

- additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to staff from whom you determined it necessary to obtain audit evidence.
- The results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- Our knowledge of fraud or suspected fraud that we are aware of and that affects the Park Authority and involves:
 - management;
 - employees who have significant roles in internal control; or
 - others where the fraud could have a material effect on the financial statements.
- Our knowledge of any allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, regulators or others.
- Our knowledge of all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing the financial statements.
- The identity of all related parties and all the related party relationships and transactions of which we are aware.

Financial statement representations

All transactions, assets and liabilities have been recorded in the accounting records and are reflected in the financial statements.

Significant assumptions used in making accounting estimates, including those measured at fair value, are reasonable.

Related party relationships and transactions have been appropriately accounted for and disclosed.

All events occurring subsequent to the reporting date which require adjustment or disclosure have been adjusted for or disclosed.

All known actual or possible litigation and claims whose effects should be considered when preparing the financial statements have been disclosed to the auditor and accounted for and disclosed in accordance with the applicable financial reporting framework.

The financial statements are free of material misstatements, including omissions. The effect of the one uncorrected misstatement identified during the audit is immaterial to the financial statements taken as a whole. We have chosen not to amend it because, in the view of officers, the potential impact of the immaterial misstatement on the understanding of the statements is outweighed by the officer and audit time required to amend the related main statements and notes.

Representations by the Park Authority

We acknowledge that the representations made by management, above, have been discussed with us.

We acknowledge our responsibility for the preparation of true and fair financial statements in accordance with the applicable financial reporting framework. The financial statements were approved by the members of the Park Authority on 26 November 2021.

We confirm that we have taken all the steps that we ought to have taken in order to make ourselves aware of any relevant audit information and to establish that it has been communicated to you. We confirm that, as far as we are aware, there is no relevant audit information of which you are unaware.

Signed by:

**Elaine Standen
Section 151 Officer**

Date: 26 November 2021

Signed by:

**Councillor Gareth Ratcliffe
Chair of the Park Authority**

Date: 26 November 2021

Appendix 2

Proposed audit report

The independent auditor's report of the Auditor General for Wales to the members of Brecon Beacons National Park Authority

Opinion on financial statements

I have audited the financial statements of Brecon Beacons National Park Authority for the year ended 31 March 2021 under the Public Audit (Wales) Act 2004.

Brecon Beacons National Park Authority's financial statements comprise the Movement in Reserves Statement, the Comprehensive Income and Expenditure Statement, the Balance Sheet, the Cash Flow Statement, and the related notes, including a summary of significant accounting policies.

The financial reporting framework that has been applied in their preparation is applicable law and international accounting standards as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21.

In my opinion the financial statements:

- give a true and fair view of the financial position of Brecon Beacons National Park Authority as at 31 March 2021 and of its income and expenditure for the year then ended; and
- have been properly prepared in accordance with legislative requirements and international accounting standards as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21.

Basis of opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing in the UK (ISAs (UK)) and Practice Note 10 'Audit of Financial Statements of Public Sector Entities in the United Kingdom'. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I am independent of Brecon Beacons National Park Authority in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled my other ethical responsibilities in accordance with these requirements. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on Brecon Beacons National Park Authority's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the responsible financial officer with respect to going concern are described in the relevant sections of this report.

Other Information

The other information comprises the information included in the annual report other than the financial statements and my auditor's report thereon. The Responsible Financial Officer is responsible for the other information contained within the annual report. My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my report, I do not express any form of assurance conclusion thereon. My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or knowledge obtained in the course of the audit, or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

Report on other requirements

Opinion on other matters

In my opinion, based on the work undertaken in the course of my audit:

- the information contained in the Narrative Report for the financial year for which the financial statements are prepared is consistent with the financial statements and the Narrative Report has been prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21;
- The information given in the Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and the Governance Statement has been prepared in accordance with guidance.

Matters on which I report by exception

In the light of the knowledge and understanding of Brecon Beacons National Park Authority and its environment obtained in the course of the audit, I have not identified material misstatements in the Narrative Report or the Governance Statement.

I have nothing to report in respect of the following matters, which I report to you, if, in my opinion:

- adequate accounting records have not been kept, or returns adequate for my audit have not been received from branches not visited by my team;
- the financial statements are not in agreement with the accounting records and returns; or
- I have not received all the information and explanations I require for my audit.

Responsibilities

Responsibilities of the responsible financial officer for the financial statements

As explained more fully in the Statement of Responsibilities for the Statement of Accounts set out on page x, the responsible financial officer is responsible for the preparation of the statement of accounts, which give a true and fair view, and for such internal control as the responsible financial officer determines is necessary to enable the preparation of statements of accounts that are free from material misstatement, whether due to fraud or error.

In preparing the statement of accounts, the responsible financial officer is responsible for assessing Brecon Beacons National Park Authority's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless deemed inappropriate.

Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud.

My procedures included the following:

- Enquiring of management and those charged with governance, including obtaining and reviewing supporting documentation relating to Brecon Beacons National Park Authority's policies and procedures concerned with:
 - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.
- Considering as an audit team how and where fraud might occur in the financial statements and any potential indicators of fraud.
- Obtaining an understanding of Brecon Beacons National Park Authority's framework of authority as well as other legal and regulatory frameworks that Brecon Beacons National Park Authority operates in, focusing on those laws and regulations that had a direct effect on the financial statements or that had a fundamental effect on the operations of Brecon Beacons National Park Authority.

In addition to the above, my procedures to respond to identified risks included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with relevant laws and regulations discussed above;
- enquiring of management, the Governance and Audit Committee, and legal advisors about actual and potential litigation and claims;
- reading minutes of meetings of those charged with governance and the National Park;
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business; and

I also communicated relevant identified laws and regulations and potential fraud risks to all audit team and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of Brecon Beacons National Park Authority's controls, and the nature, timing and extent of the audit procedures performed.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website www.frc.org.uk/auditorsresponsibilities. This description forms part of my auditor's report.

Certificate of completion of audit

I certify that I have completed the audit of the accounts of Brecon Beacons National Park Authority in accordance with the requirements of the Public Audit (Wales) Act 2004 and the Auditor General for Wales's Code of Audit Practice.

Adrian Crompton
Auditor General for Wales
30 November 2021

24 Cathedral Road
Cardiff
CF11 9LJ

Appendix 3

Summary of corrections made

We identified the following misstatements that have been corrected by management, but which we consider should be drawn to your attention due to their relevance to your responsibilities over the financial reporting process.

Exhibit 2: summary of the main corrections made

Value of correction	Nature of correction	Reason for correction
Various	A number of the previous year's audited figures had been brought forward incorrectly, which had to be corrected.	To ensure that the comparative figures are accurate.
Various	There were numerous arithmetical and cross-referencing errors, which had to be corrected.	To ensure that the accounts are arithmetically accurate and well referenced.
£4.24 million	<u>Expenditure and Funding Analysis (EFA)</u> The figures for 'Loss of Revaluation of Assets' and 'Actuarial Loss on Pensions Liabilities' were disclosed the wrong way round.	To ensure that EFA is accurate and that the disclosures are consistent and accurate throughout the accounts.
£175,000	<u>Note 15: Creditors</u> Some of the 'Section 106' creditors were due for payment after more than one year, as at 31 March 2021. They are therefore long-term creditors, which had been incorrectly disclosed in the balance sheet as short-term creditors. The misstatement was a material classification error.	To ensure the correct classification of short and long-term creditors.

Value of correction	Nature of correction	Reason for correction
£12,500	<p><u>Note 12: Intangible assets</u> An intangible asset had been derecognised (or disposed) despite still being in use. The carrying amount and cumulative amortisation were therefore understated.</p>	To ensure that the intangibles assets are correctly disclosed.
Various audit adjustments, as set out to the right. Four of the adjustments are material, being over £5,000.	<p><u>Note 24: Related parties</u> Numerous related-party transactions were omitted from Note 24 which had to be added, being:</p> <ul style="list-style-type: none"> • Biodiversity Information Service (expenditure of £20,579); • Natural Resources; Wales (grant income of £71,373 and expenditure of £902; with a year-end debtor of £61,588 and income received in advance of £1,000); • Wokingham Borough Council (expenditure and year-end creditor of £4,540); • National Parks Partnerships (expenditure of £10,000); and • Usk Valley Training (expenditure of £972). 	To ensure that the related party transactions and balances are fully and accurately disclosed.
£10,000	<p><u>Note 23: Grant income</u> The 'Other Government Grants' figure in Grant Income note was understated by £10,000.</p>	To ensure that the Note is accurate.

Appendix 4

Recommendations

Exhibits 3 to 11 set out our recommendations and management's responses. We will review the actions taken by management as part of next year's audit.

Exhibit 3: matter arising 1

Weaknesses in the accounts submitted for audit	
Findings	<p>Last year we reported that the draft accounts submitted for audit had contained numerous errors and that the Park Authority did not have appropriate quality review arrangements in place.</p> <p>We have similar findings this year, with the draft accounts containing numerous basic errors that required additional audit work.</p> <p>We have also found that the accounts are overly complex, making their preparation by officers, and their audit, more difficult than it should be.</p> <p>We have reminded officers of the guidance in place by the Chartered Institute of Public Finance and Accountancy (CIPFA), and its model set of local government accounts, which would be straightforward to prepare and be an enhanced document for the reader.</p>
Recommendation	<p>The Park Authority should simplify its 2021-22 accounts, using CIPFA's model accounts as a basis. The Park Authority should implement arrangements to review the quality of its annual draft accounts, prior to their submission for audit.</p>
Accepted in full by management	Agreed
Management response	<p>The use of the CIPFA model statement may make a small impact on the complexity of the accounts for the lay reader and on the process of accounts preparation.</p> <p>Arrangements for internal review of the annual accounts will be considered and resourced as</p>

	appropriate. Arithmetical errors were (in the main) related to rounding differences.
Implementation date	31/3/22

Exhibit 4: matter arising 2

Some related-party declarations had not been sought	
Findings	<p>Last year we reported that we had continued to experience problems obtaining information to support the related party disclosures.</p> <p>The examination of related parties is a particularly important part of our audit, with a low materiality level of £5,000 each year (per paragraph 3 of this report).</p> <p>As well as testing the disclosures that have been made in the draft accounts, importantly, we also test whether any disclosures have been overlooked and omitted from the draft accounts.</p> <p>We therefore require all the related-party declarations in respect of senior officers and members, including from those who left during the financial year.</p> <p>This year we found that while all members had provided their annual declarations, senior officers had not been asked for theirs. Finance officers therefore had to request them during the audit process, including from former officers who had left the organisation (such as the former Chief Executive).</p> <p>The related-party audit adjustments are set out at page 16.</p>
Recommendation	<p>Soon after the financial year-end, the Park Authority should request and obtain related-party declarations from all its senior officers and members.</p> <p>The Park Authority should ensure that, when a senior officer or member is due to leave the organisation, it obtains the individual's related-party declaration prior to their departure. This requirement should be part of the Park Authority's leaver's checklist.</p>

Accepted in full by management	Agreed
Management response	Agreed
Implementation date	Immediate

Exhibit 5: matter arising 3

Two related-party declarations were incomplete	
Findings	<p>Our audit of related parties includes online searches of Companies House and Charity Commission records. We do these searches to check the completeness of members and senior officers' declarations. We established that one member and one senior officer had each failed to declare an interest. The overlooked interests were subsequently evaluated as part of our audit.</p> <p>The related-party audit adjustments are set out at page 16.</p>
Recommendation	<p>At the start of next year's related party process, the Park Authority should formally remind all members and senior officers of the importance of declaring all influential positions and interests required per the guidance.</p>
Accepted in full by management	Agreed
Management response	Agreed
Implementation date	31/3/22

Exhibit 6: matter arising 4

Inappropriate sharing of a person's ID log-in details	
Findings	<p>We established that during 2020-21 a senior officer had been permitted to use the then Chief Executive's log-in details to the financial ledger. They had used the Chief Executive's log-in details to authorise payments totalling £8,920, during the period 14 September 2020 to 9 December 2020.</p> <p>Management explained to us that the arrangement had been necessary because of the Chief Executive's absence at the time, and the high level of senior vacancies at the time and lack of cover.</p>
Recommendation	<p>The Park Authority should not let someone know another person's log-in details and permit their use. When necessary, the Park Authority should enhance the access rights and/or delegated authority of an employee's (or member's) log-in details.</p>
Accepted in full by management	Agreed
Management response	Implemented
Implementation date	Immediate

Exhibit 7: matter arising 5

The Scheme of Delegation does not include references to ex-gratia payments	
Findings	<p>The Park Authority's Chief Executive left on 31 March 2021 and received an ex-gratia payment, as disclosed in the audited accounts.</p> <p>The payment was approved by the members of the Park Authority, under the Scheme of Delegation (SoD). We found however that the SoD does not</p>

	<p>cover ex-gratia payments. The SoD does have the following references for Park Authority decisions on employees:</p> <ul style="list-style-type: none"> • ‘To determine and approve the terms and conditions, including amendments thereto, of employment of all employees.’ • ‘To deal with voluntary redundancies.’ <p>We consider that neither of these references are relevant to the Chief Executive’s exit.</p>
Recommendation	The Park Authority should update its Scheme of Delegation so that it explicitly covers ex-gratia payments.
Accepted in full by management	Agreed
Management response	The amended Scheme of Delegation will be updated.
Implementation date	31/12/21

Exhibit 8: matter arising 6

Two members’ register of interests are not available to the public	
Findings	At the time of our audit, we found that two members do not have their register of interests published on the Park Authority’s website.
Recommendation	The Park Authority should publish all members’ registers of interests and regularly check that they are up to date.
Accepted in full by management	Agreed

Management response	The register will be regularly checked
Implementation date	With immediate effect

Exhibit 9: matter arising 7

There is a weak process in place to keep track of employees' leave	
Findings	<p>We established that the Park Authority does not have a central system, nor standard process, for managing and recording employees' leave. Instead, the process applied and the documentation recorded are at the discretion of each line manager.</p> <p>To account for the year-end leave accrual for undertaken leave, the Park Authority therefore relies on the circularisation of its line managers. We found however that the response rate to have been poor, and that outstanding returns had not been pursued effectively by finance or HR officers.</p>
Recommendation	<p>For 2021-22, the Park Authority should prepare and introduce a mandated return for every line manager to complete and sign. The return should be provided by a line manager soon after 31 March 2022, for leave balances at that date, for all employees that they line manage.</p> <p>Looking longer term, the Park Authority should implement a standard system and/or process for the management of employees' leave.</p>
Accepted in full by management	Agreed
Management response	Agreed
Implementation date	31/3/22

Exhibit 10: matter arising 8

The fixed asset register does not agree to the financial ledger	
Findings	We found that there is a discrepancy of £87,253 between the ledger and the fixed asset register. We are satisfied that the balance in the ledger and the accounts is correct and that the anomaly is within the register.
Recommendation	The Park Authority should investigate and rectify the anomaly in the register. The Park Authority should undertake and documented a periodic reconciliation of the fixed asset register to the ledger, doing so at least annually at the financial year-end.
Accepted in full by management	Agreed
Management response	Agreed
Implementation date	31/3/2022



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We welcome correspondence and telephone calls in Welsh and English.
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.