

Section	Question	Answers/Actions
1	<p><b>Reviewing the results in your slide pack</b></p> <ul style="list-style-type: none"> <li>• What were our outcomes from the most recent NFI exercise?</li> <li>• How do we compare to other similar councils?</li> <li>• Are there areas where we appear to perform well/did not perform well?</li> </ul>	<p>The report shows that Tonbridge &amp; Malling identified around £60,000 of fraud and error and in all areas performed above the average of district councils and those considered to be CIPFA nearest neighbours.</p>
2	<p><b>Maximising the benefits of the NFI</b></p> <ul style="list-style-type: none"> <li>• Are data matches followed up promptly?</li> <li>• Are funds being successfully recovered?</li> <li>• Do we prosecute where possible?</li> <li>• What assurances or conclusions do we draw from the NFI about the effectiveness of internal controls and the risks we face?</li> <li>• What changes, if any, have we made as a result of these conclusions?</li> </ul>	<p>All data matches are reviewed by relevant departments to determine whether there has been an error or that fraudulent activity may have taken place. The authority takes all appropriate steps to recover any incorrectly paid funds and does take steps to prosecute those found to have committed criminal offences.</p> <p>Further clarification would be needed to fully determine the effectiveness of internal controls. The report is based upon the financial outcomes that have been identified but as this does not detail the number of cases involved, it is not possible to say whether there have been multiple cases in a particular area, which would identify weaknesses in procedure, or a small number of isolated cases that have penetrated an otherwise robust process.</p>
3	<p><b>The NFI in our council</b></p> <ul style="list-style-type: none"> <li>• What governance arrangements do we have in place to ensure we achieve the best possible outcomes from the NFI and who monitors them?</li> <li>• Is the NFI included in the remit of our audit committee or equivalent committee?</li> <li>• How do we keep other elected members or non-executive members informed about the NFI?</li> <li>• How is the NFI reflected in the governance training and</li> </ul>	<p>The results of the data matching exercises are passed to relevant departments for assessment to identify whether action is required. This process eliminates any false positive matches, which generally consist of cases where the authority was already aware of the relevant data but yet to act upon it.</p> <p>At present the investigation team undertakes enquiries into matches linked to suspected benefit and council tax fraud. These are monitored by the Fraud Investigations Manager while the overall exercise is monitored by the Audit Manager as the authority's designated key contact.</p>

	development provided for officers and elected members?	NFI activity is included in the remit of the Audit Committee and members are kept up to date via reports from the Audit and corporate fraud teams.
4	<p><b>Broadening your council's engagement with NFI</b></p> <ul style="list-style-type: none"> <li>• Did we participate in the subsidised personal budget (direct payments) to deceased data pilot and housing benefits to student loans pilot matching that the NFI offered in October 2013? If not, why not?</li> <li>• Are there any potential pilot matches we want to suggest to the NFI team?</li> <li>• Have we considered how we could use the NFI flexible data matching service to prevent fraud or detect fraud sooner?</li> </ul>	<p>Tonbridge and Malling did not take part on the subsidised personal budget (direct payments) to deceased data pilot as the county council are responsible for this area of work. The Housing Benefit to student loans pilot was considered but the level of cases identified by the existing data matches offered by the NFI as a standard exercise suggested that this would not be a cost effective option as the level of return would not match the initial cost.</p> <p>Individual local authorities undertake their own data matching exercises using external companies to match credit referencing data against their own records. If the NFI were to be expanded to include credit referencing as one of their data sets, it could be compared with the existing council tax SPD to Electoral Register information to improve the quality of the matches identified.</p> <p>At present, the datasets included in the flexible data matching service are limited to council tax SPD to electoral roll data. Data matching is a proven way of identifying instances of fraud and error but until further datasets are available, the potential results that could be identified are insufficient to justify the costs associated with additional data matching.</p>
5	<p><b>The NFI fit with wider counter-fraud policies</b></p> <ul style="list-style-type: none"> <li>• Do we have an elected member for counter fraud activity and the NFI?</li> <li>• How does the NFI influence the focus of our counter fraud work?</li> <li>• Do we publicise the outcomes from the NFI externally?</li> </ul>	<p>Councillor Martin Coffin, Cabinet Member for Finance, Innovation and Property, is the elected member for counter fraud activity, which includes the NFI.</p> <p>The NFI forms the core data matching work of the investigation team and is a key element to the counter fraud work undertaken by the authority. Matches assessed as requiring fraud investigation are dealt with by the investigation team as part of their overall investigation work.</p>

		<p>Tonbridge and Malling publicises successful prosecution cases in local press, no matter what their source. Members are provided with annual reports that include specific updates on NFI. These are publicly available reports.</p>
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