



**INTERNAL AUDIT AND COUNTER FRAUD
PROGRESS REPORT
AUDIT COMMITTEE
26th January 2026**

1. Introduction

The role of the Internal Audit function is to provide Members and Management with independent assurance that the control, risk and governance framework in place within the Council is effective and supports the Council in the achievement of its objectives. The work of the Internal Audit team should be targeted towards those areas within the Council that are most at risk of impacting on the Council's ability to achieve its objectives.

Upon completion of an audit, an assurance opinion is given on the effectiveness of the controls in place. The results of the entire programme of work are then summarised in an opinion in the Annual Internal Audit Report on the effectiveness of internal control within the organisation.

This activity report provides Members of the Audit Committee and Management with a summary of completed work between September and December 2025.

2. Key Messages

- 3 audits have been finalised to final report in the period. The summaries are contained in **Appendix A**
- 6 of 20 originally agreed audits from the 2025/26 rolling Audit Plan have been completed to at least draft report stage, plus one grant review.
- A further 5 audits are in Fieldwork, and 5 audits are in Planning. The status of all audits on the 2025/26 plan is detailed in **Appendix B**
- There has been one amendment to the 2025/26 Audit Plan. Due to timings of the rollout of the updated Risk Management Policy and Procedures, the planned Risk Management audit has been deferred to 2026/27. This audit has been replaced with an audit of the Annual Service Delivery Plan 2025/26, the activities and performance targets outlined in the plan directly link with delivering and embedding the TMBC Corporate Strategy.
- The External Quality Assessment (EQA) is now underway, the assessor is evaluating KCC Internal Audit conformance against each of the 5 domains set out in the Global Internal Audit Standards. A report is expected in March 2026, both the report and any subsequent action plans developed will be presented at a future Audit Committee.
- The Counter Fraud Team were Highly Commended by the CIPFA 2025 Public Finance Award Judges in the Outstanding Fraud Prevention, Detection and Recovery category. The nomination was in respect of the work done on developing a Counter Fraud Culture across Kent County Council and our client base.

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3. Resources

In accordance with the Global Internal Audit Standards, Members need to be apprised of relevant matters relating to the resourcing of the Internal Audit function. The key updates are as follows:

- The Head of Internal Audit and Counter Fraud Service left the service at the beginning of September 2025 – interim arrangements remain in place; an interim Head of Internal Audit and an Interim Head of Counter Fraud have been internally resourced until a recruitment exercise is undertaken to fill the post permanently.
- Recruitment for a Data Analyst has concluded, this position will be filled from the end of January 2026. This role is anticipated to enhance our capabilities in this area and aid with delivery of our Data Analytics Strategy.
- An additional Principal Auditor has been recruited into the service to support delivery.
- Internal Audit continues to review the functionality of the K10 Vision Audit Management Software implemented last year and are working with the provider with proposals to continue to develop reporting modules.
- The use of Artificial Intelligence is actively being explored to create efficiencies and enhance delivery.

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4. 2025-26 Internal Audit Plan

The audit summaries are provided at [Appendix A](#). A summary is provided on current progress against the 2025-26 Audit Plan.

Table 1- Audit Plan Status

Status	Number of Audits	%
Not yet started	1	5%
Planning	5	25%
Fieldwork	5	25%
Ongoing	1	5%
Draft Report	0	0%
Final Report	6	30%
On Hold	0	0%
Removed/ Deferred	2	10%
Total	20	100%

[Appendix B](#) sets out progress against the Rolling 2025-26 Audit Plan.

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Table 2 – Summary of Audits by Committee Meeting

With each Progress report, Internal Audit turns the spotlight on the audit reviews, providing the Audit Committee with a summary of the objectives of the review, the key findings, conclusions and recommendations; thereby giving the Committee the opportunity to explore the areas further, should it wish to do so.

In this period, the report summaries for the audits detailed below are provided at **Appendix A** for the Committee's information and discussion.

Audit Definitions are provided at **Appendix C**

Audit Committee 26th January 2026				
Ref	Audit	Status	Assurance	Prospects for Improvement
TM02-2026	Appraisal Process	Complete	Adequate	Good
TM03-2026	IT Asset Management	Complete	Adequate	Good
TM06-2026	Gibson Accommodation Project (Ongoing Embedded Assurance)	Complete	N/A - Advisory only	N/A - Advisory only

5. Quality Assurance and Improvement Programme

5.1 As previously presented to the Audit Committee, a new set of Global Internal Audit Standards (the Standards) are now in effect from January 2025. The Standards are arranged into 5 Domains (with 53 individual standards):

- I. Purpose of Internal Auditing
- II. Ethics and Professionalism.
- III. Governing the Internal Audit Function
- IV. Managing the Internal Audit Function
- V. Performing Internal Audit Services

5.2 An assessment has previously been undertaken to identify areas for improvement or enhancement to the practices of Internal Audit to ensure compliance with the Standards. Actions have been identified against each of the standards where either improvement or enhancement is required. These actions have been considered against the new CIPFA application note for the UK Public Sector that has been released to aid application of the standards.

5.3 The External Quality Assessment (EQA) is underway, Internal Audit have completed a self-assessment of compliance with the Global Internal Audit Standards and this will be reviewed by the assessor who will be evaluating conformance against each of the 5 domains set out in the Standards. A report is expected in March 2026, both the report and any subsequent action plans developed will be presented at a future Audit Committee.



6. Issue Implementation

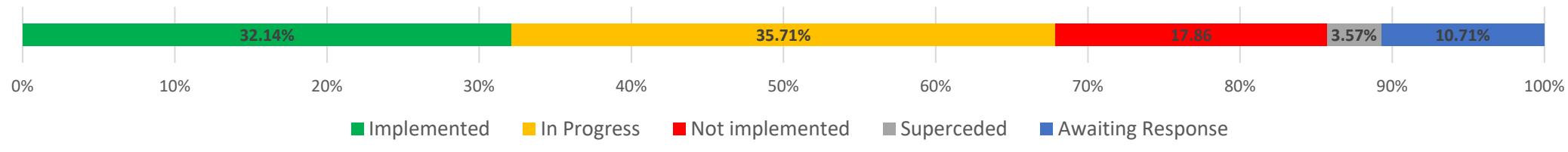
Management Actions identified to address audit findings are followed up to ensure implementation. There are 28 recommendations due for implementation, of which 10 recommendations have been implemented or superseded resulting in 18 being outstanding. The status of the outstanding 18 actions are categorised below by the risk priority assigned in the original report.

- There are currently 5 overdue Medium risk issues Not Implemented, 3 relate to Taxi Licensing and 1 relating to Disabled Facilities Grant, these audits were both completed in 2023, the remaining issue relates to Starters, Movers and Leavers and became due in December 2025.
- The superseded High risk issue relates to GDPR and specifically deletion of data, an audit of GDPR data retention is currently in planning to provide assurance on this.
- The “awaiting a response” Medium risk issues, 2 relate to Digital Strategies and became due in November 2025, the remaining relates to IT Development and a revised Implementation date had been agreed of 31/03/2025.

Summary of Issue Implementation

	Total Number due for Implementation		Implemented		In Progress		Not Implemented		Superseded		Awaiting a Response	
	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium
Total	3	25	2	7	0	10	0	5	1	0	0	3
Total %		32.14%		35.71%		17.86%		3.57%		10.71%		

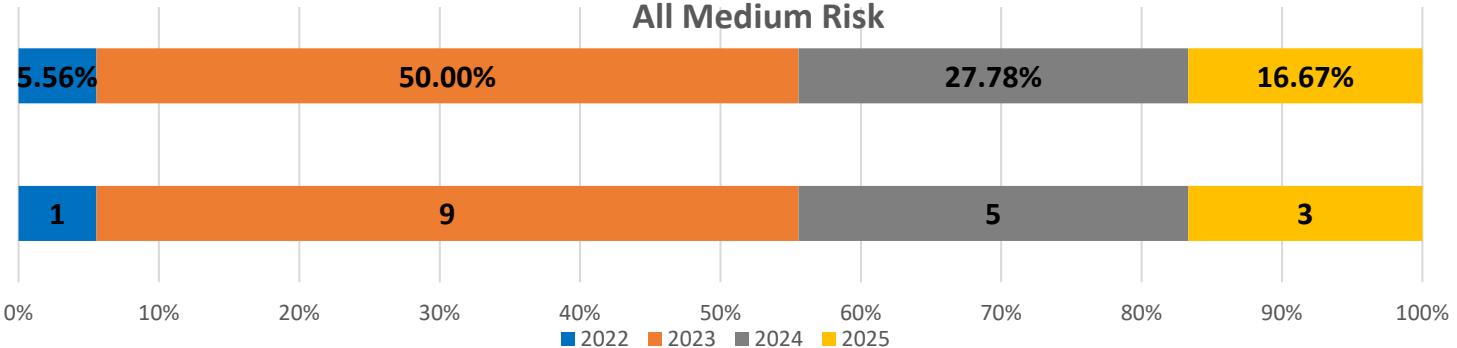
Overall Implementation of Agreed Management Actions



Progress on longstanding issues.

- 18 issues remain In Progress (10), Not Started (5), or Awaiting Response (3) for the period. All are Medium Risk.
- The three longest standing issues have been open beyond their original implementation date for over 2 years. Updates and revised implementation dates are detailed below.

Issues in Progress, Not Started or Awaiting Response by year raised



Audit/Issue Title	Priority	Original Date	Revised Date	Description and Most Recent Update Provided
Taxi and Vehicle Licensing and Monitoring - Establishing whether the current number of approved garages is appropriate	Medium	31/08/2023	30/04/2025	22.01.2024 Analysis of Garages being used completed, letters to be sent to all garages to establish those who wish to continue providing service and then select those garages to continue with and update garages contracts and MOU's. Update July 25 – no progress made, the person assigned with this project, a temporary agency Licensing Officer did not progress this and no longer works for TMBC.
Taxi and Vehicle Licensing and Monitoring - DBS Certificates for license renewals	Medium	31/10/2023	30/04/2025	22.01.2024 The Licensing Team is actively looking for an outside provider to run the DBS checks for applicants, if they are not already registered with the on-line update service. Update July 25 The provider we identified was HR Connect and was not progressed due to resource issues.
Taxi and Vehicle Licensing and Monitoring - Contracts and service level agreements with approved garages	Medium	31/10/2023	30/04/2025	22.01.2024 Letters sent to all garages asking them to confirm they wish to continue providing the vehicle safety checks and advising that SLA would be issued. This never progressed - Update July 2025 – no progress made, the person assigned with this project, a temporary agency Licensing Officer did not progress this and no longer works for TMBC.

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7. Counter Fraud Update

Prevention and Detection of Fraud, Bribery and Corruption

This section of the report provides details of the Council's activity in preventing and detecting fraud and corruption during the second quarter of the financial year of 2025/26.

National Fraud Initiative

The Counter Fraud Team has collated the data specified by the Cabinet Office for the 2024/25 exercise. This includes reviewing the data to ensure it complies with the formats required and uploading in the required timescale.

The National Fraud Initiative (NFI) reports its data on a calendar-year basis (January to December), whereas TMBC reports quarterly aligned to the financial year (April to March). This difference in reporting periods can create a disconnect, as NFI data may include cases that fall outside TMBC's quarterly reporting framework.

The Counter Fraud Team reports on the activity it carries out each quarter. This ensures that the outcomes from NFI-related work are clearly aligned with TMBC's internal reporting cycle, providing transparency and consistency in how results are presented within the financial year framework.

The NFI biennial and annual data exercise is progressing with matches being reviewed by relevant teams. A summary of the biennial exercise is shown in **Annex D** and a summary of the annual exercise is shown in **Annex E**.

The annual exercise (Single Person Discount to Register of Electors) forms part of the Kent Intelligence Network activity, reported on the next page.

The biennial exercise will be reviewed during quarter 3 as resources concentrate on completing the annual exercise. It is noted that the biennial exercise does take time to investigate and complete due to their nature and at time dependencies on DWP payable benefits impacted on TMBC abilities to update accounts.

7. Counter Fraud Update

Kent Intelligence Network (KIN)

The Kent Intelligence Network continues to support Local Authorities in Kent in preventing and detecting fraud. The key focus area for 2025/26 continues to look at fraud and error within Single Person Discounts, Small Business Rate Relief and unrated business and residential premises. Q2 2025/26 the following results have been achieved:

Single person discount reviews from fraud referrals increased council tax liability by £13,106. Total value of single person discounts removed during Q2 is £43,998.

The 2025/26 rolling total single person discounts removed £64,725, with increased liability totalling £19,994. Shown in [Annex F](#).

Unrated businesses, 3 cases have been sent to the valuation office, with them closing 2 with no further action with 1 open case awaiting the valuation office to assess liability.

The 2025/26 rolling total referrals to the valuation office are 7 with 4 being closed with no further action 3 open cases awaiting the valuation office to assess liability.

Unrated residential premises missing council tax total 23 cases. 5 referred to the valuation office, 1 has been closed with no further action with 17 awaiting the valuation office to assess liability.

The 2025/26 rolling total cases are 26 with 3 being closed with no further action. There are 23 cases currently awaiting the valuation office to assess liability.

The 2025/26 rolling total of debtors being traced is 103, resulting in £232,137 of debt that can be actively pursued for further recovery action.

7. Counter Fraud Update

Investigating Fraud, Bribery and Corruption

A summary of cases referred or carried into the current quarter can be found in **Annex G**.

A total of 26 new referrals have been received by the Counter Fraud Team in Q2 2025/26. The most reported fraud type involves Council Tax Reduction and DWP benefits, such as Housing Benefits and/ or universal credit, totalling 16 referrals.

The second most reported fraud type is Single Person Discount on council tax, where a total of 8 referrals have been reported. Further detail is available in **Annex H**.

Q2 2025/2026, 19 referrals have been closed.

- 6 closed - error identified and corrected with a recoverable value of £3,987.
- 6 referrals sent to partner agency, DWP.
- 6 referrals closed no further action / investigation complete / insufficient evidence.
- 1 financial recovery only.

A total of 48 cases from 2025/26 are currently open and live.

- 18 Housing Benefit / UC.
- 13 Single Person Discount.
- 4 Council Tax Reduction / Exemption.
- 2 Business Rate Relief.
- 5 Homeless / Housing Application.
- 6 Other.

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TM06-2026 Gibson Accommodation Project

Audit Objective	Internal Audit were engaged on a consultancy basis, to provide embedded assurance and advice on pre-agreed aspects of project management for the delivery stage of the Gibson Accommodation Project. Internal Audit evaluated the controls in place to effectively manage the Project and provide assurance that risks are being mitigated. As this is an embedded assurance engagement, there will be ongoing involvement and a further management letter in due course. Given the advisory nature, Audit Opinion and Prospects for Improvement ratings are not provided.	Audit Opinion		Prospects for Improvement	
		N/A		N/A	
	Actions	Number	Agreed	Risk Accepted	
High	0	0	0	0	
Medium	3	3	0	0	
Low	1	1	0	0	

Key Strengths		Areas For Development	
Effective project scheduling and monitoring	The project uses a Gantt chart for scheduling and tracking, which is regularly updated to reflect changes and delays.	Low	Financial Planning: Confirm when the £200k savings from the Gibson West sale will be realised and ensure this timing is accurately reflected in the MTFP.
Governance and oversight	Monthly Project Schedule Reports are presented to the Corporate Property Delivery Board, attended by senior leadership, ensuring visibility and accountability.	Low	Project Resources: Maintain an up-to-date resource plan to clarify roles, responsibilities, and availability, supporting effective planning and risk reduction.
Responsive risk management	New risks, such as those related to Biodiversity Net Gains, are promptly captured in the risk register and escalated for discussion at governance level.	Low	Risk Management: Update the risk register to include contractor-specific risks with mitigations and ensure consistency with reports to the Corporate Property Delivery Board.
Active stakeholder engagements	Regular staff updates via Staffnet and representation from each Directorate in the Office Space Working Group demonstrate ongoing communication and feedback mechanisms.	Low	Change Control: Implement a simple change log to record potential changes, decisions, impacts, and approvals, providing transparency and an audit trail.
		Low	Benefits Realisation: Document all intended benefits, create a proportionate tracking plan with key KPIs, and integrate benefits tracking into project closure to demonstrate outcomes.

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TM02-2026 Appraisal Process

Audit Objective	<p>As part of the 2025/26 Audit Plan, it was agreed that Internal Audit would undertake a review of the appraisal process. The aim of the audit was to provide assurance that the recently implemented new appraisal process had been adhered to across the organisation, that it aligned with best practice guidance, the Corporate Strategy 2023-27, and Annual Service Delivery Plan 2025/26.</p>			
	Audit Opinion	Prospects for Improvement		
	Adequate	Good		
	Actions	Number	Agreed	Risk Accepted
	High	0	0	0
	Medium	3	3	0
	Low	1	1	0

Key Strengths		Areas For Development		
Framework	<ul style="list-style-type: none"> ✓ Appraisal policy and guidance is clear and accessible and aligned with strategic priorities. ✓ Policy objectives, responsibilities, timelines, and performance criteria are well defined. 	Medium	Inconsistent Monitoring of Appraisal Completion: Appraisal completion is tracked manually using spreadsheets and MS Forms. Reporting is informal, with limited visibility beyond Directors and the Chief Executive. There is no formal dashboard, reporting schedule, or evaluation mechanism in place.	
Compliance	<ul style="list-style-type: none"> ✓ Adequate HR oversight of completion ✓ Comprehensive training materials are available for managers and staff.. 	Medium	Limited uptake of existing training or feedback regarding its effectiveness: TMBC provides a wide range of training materials to support the appraisal process; however, participation is not mandatory, and uptake remains low. Informal feedback relating to this training is not systematically captured.	
Quality & Consistency	<ul style="list-style-type: none"> ✓ A structured online appraisal form encourages reflection and goal setting. HR support reinforces consistency and quality. ✓ Plans in place for formal training rollout and uptake improvement in 2026/27. 	Medium	Limited Integration of Appraisal Outcomes with Development and Performance Management: Appraisal outcomes are intended to inform training and development, but there is no formal system to track or action them, and development planning remains informal and varies between departments.	
Staff Development	<ul style="list-style-type: none"> ✓ Appraisal outcomes include identification of training needs and career aspirations. ✓ Workforce Development Strategy supports training and succession planning. 	Low	Use of legacy appraisal forms: Some departments continue to use outdated appraisal forms, despite the launch of a new framework. In addition, there is uncertainty over the effectiveness of appraisal reporting.	
Reporting	<ul style="list-style-type: none"> ✓ Appraisal completion rates are reported to Directors and Chief Executive. ✓ Plans are in place to develop reporting further with improved visibility through dashboards and for this to be rolled out to the wider management team. 			

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TM03-2025 IT Asset Management

Audit Objective	<p>As part of the 2025/2026 Audit Plan, it was agreed that Internal Audit would undertake a review of the controls in place to manage the identification, maintenance, upgrade, and disposal of the Council's IT assets. This includes assessing whether IT assets are correctly classified and determining if any should be treated as capital assets.</p> <p>The aim of the audit is to provide assurance that IT asset management processes are robust, ensuring assets are accurately recorded, securely managed throughout their lifecycle, and disposed of in compliance with relevant legislation and best practice. The audit will also seek to confirm that risks relating to security, compliance, and financial efficiency are effectively mitigated.</p>

Audit Opinion		Prospects for Improvement	
Adequate		Good	

Actions	Number	Agreed	Risk Accepted
High	0	0	0
Medium	3	3	0
Low	1	1	0

Key Strengths	
Asset Records and Reconciliation	<ul style="list-style-type: none"> ✓ Centralised asset register exists with expected mandatory fields (asset ID, custodian, lifecycle status) ✓ An audit trail mechanism captures changes and updates made via timestamps and unique identifiers ✓ Role-based access controls to the asset register system are in place with tiered permissions (Viewer, Technician, Maintenance, Audit, System Owner), reducing risk of unauthorized changes.
Physical Asset Management Procedures (including Acquisition, Loss, Theft, or Disposal)	<ul style="list-style-type: none"> ✓ Procedures for recording, storing and allocating new assets were observed and considered to be robust. ✓ Encryption enforcement and remote wipe capabilities are operational through Microsoft Intune, reducing risk of data exposure from lost or stolen devices. ✓ Approved disposal vendors hold ISO27001, ISO14001, and ADISA certifications, and provide detailed WEEE documentation and environmental compliance statements.

Areas For Development	
Medium	<p>Content and Governance of the ITAM Policy Absence of specific and detailed IT asset management procedures and no evidence of periodic policy review.</p>
High	<p>Inaccurate and Inefficient Asset Register Management Outdated or Incomplete location data in the asset register - references to rooms that no longer exist post-relocation to Gibson West building. Physical verification of asset location was possible, however relied on informal knowledge. Additionally audit found a lack of regular reconciliation or audit log reviews.</p>
Medium	<p>Disposal Governance and Physical Security Items disposed of lack links to, or reference to, the associated disposal certificates. Location fields not updated in the asset register when assets were moved to secure storage prior to disposal. Physical access controls for the garage are not currently supported by sign-in/out logs for keys.</p>
Medium	<p>Event Driven Lifecycle Management Asset refresh decisions are reactive based on OS end-of-life or warranty expiry rather than based on a formal schedule or prioritization criteria. No escalation process for overdue renewals and no linkage between helpdesk trends and refresh planning.</p>

Appendix B - 2025/26 Internal Audit Plan Status

Ref	Audit	Status	Assurance	Prospects for Improvement	Committee
TM04-2026	Starters and Leavers	Complete	Adequate	Good	Sep-25
TM01-2026	Parking Enforcement	Complete	Adequate	Good	Sep-25
TM05-2026	UK shared Prosperity, Rural Prosperity Fund review	Complete	Substantial	Very Good	Sep-25
TM02-2026	Appraisal Process (SP and staff development)	Complete	Adequate	Good	Jan-26
TM03-2026	IT Asset Management	Complete	Adequate	Good	Jan-26
TM06-2026	Gibson Accommodation Project	Complete	N/A - Advisory	N/A - Advisory	Jan-26
TM07-2026	Waste Contract Re-tender	Fieldwork			
TM08-2026	Local Plan	Fieldwork			
TM16-2026	Corporate Credit Cards	Fieldwork			
TM20-2026	AGILE Withdrawal	Fieldwork			
TM14-2026	Housing Condition	Fieldwork			
TM19-2026	GDPR - Record Retention	Planning			
TM10-2026	Angel Centre	Planning			
TM09-2026	Town Centre	Planning			
TM17-2026	IT Cyber Security	Planning			
TM18-2026	EDI	Planning			
TM21-2026	Community Governance Review on Tonbridge Town Council	Not Started			
TM22-2026	Annual Service Delivery Plans (Addition January 2026)	Not Started			
TM13-2026	Home Upgrade Scheme Grant	Complete	N/A	N/A	
TM12-2026	Independent planning reviewer	Ongoing	N/A	N/A	
TM15-2026	Risk Management	Deferred to 26/27	N/A	N/A	
TM11-2026	Castle project	Cancelled	N/A	N/A	

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Audit Opinion

High	<p>Internal control, Governance and the management of risk are at a high standard. The arrangements to secure governance, risk management and internal controls are extremely well designed and applied effectively.</p> <p>Processes are robust and well-established. There is a sound system of control operating effectively and consistently applied to achieve service/system objectives.</p> <p>There are examples of best practice. No significant weaknesses have been identified.</p>	Limited	<p>Internal Control, Governance and the management of risk are inadequate and result in an unacceptable level of residual risk. Effective controls are not in place to meet all the system/service objectives and/or controls are not being consistently applied.</p> <p>Certain weaknesses require immediate management attention as there is a high risk that objectives are not achieved.</p>
Substantial	<p>Internal Control, Governance and management of risk are sound overall. The arrangements to secure governance, risk management and internal controls are largely suitably designed and applied effectively.</p> <p>Whilst there is a largely sound system of controls there are few matters requiring attention. These do not have a significant impact on residual risk exposure but need to be addressed within a reasonable timescale.</p>	No Assurance	<p>Internal Control, Governance and management of risk is poor. For many risk areas there are significant gaps in the procedures and controls. Due to the absence of effective controls and procedures no reliance can be placed on their operation.</p> <p>Immediate action is required to address the whole control framework before serious issues are realised in this area with high impact on residual risk exposure until resolved</p>
Adequate	<p>Internal control, Governance and management of risk is adequate overall however, there were areas of concern identified where elements of residual risk or weakness with some of the controls may put some of the system objectives at risk.</p> <p>There are some significant matters that require management attention with moderate impact on residual risk exposure until resolved.</p>		

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Prospects for Improvement		Issue Risk Ratings	
Very Good	There are strong building blocks in place for future improvement with clear leadership, direction of travel and capacity. External factors, where relevant, support achievement of objectives.	High	There is a gap in the control framework or a failure of existing internal controls that results in a significant risk that service or system objectives will not be achieved.
Good	There are satisfactory building blocks in place for future improvement with reasonable leadership, direction of travel and capacity in place. External factors, where relevant, do not impede achievement of objectives.	Medium	There are weaknesses in internal control arrangements which lead to a moderate risk of non-achievement of service or system objectives.
Adequate	Building blocks for future improvement could be enhanced, with areas for improvement identified in leadership, direction of travel and/or capacity. External factors, where relevant, may not support achievement of objectives	Low	There is scope to improve the quality and/or efficiency of the control framework, although the risk to overall service or system objectives is low.
Uncertain	Building blocks for future improvement are unclear, with concerns identified during the audit around leadership, direction of travel and/or capacity. External factors, where relevant, impede achievement of objectives.		

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Appendix D – National Fraud Initiative – Biennial Exercise

NATIONAL FRAUD INITIATIVE 2024/2025

AUTHORITY SUMMARY: Tonbridge & Malling Borough Council

29-Sep-2025

No.	Report Name	Total Recommended	Total All	Status	Processed	In Progress	Frauds	Errors	Savings
2 High	Housing Benefit Claimants to Student Loans, High Quality, Between Bodies		1	Not Opened	0	0	0	0	£0.00
27 High	Housing Benefit Claimants to Housing Benefit Claimants, High Quality, Between Bodies		1	Not Opened	0	0	0	0	£0.00
31 High	Housing Benefit Claimants to Housing Tenants, High Quality, Between Bodies		3	Opened	1	0	0	0	£0.00
47.6 Low	Housing Benefit Claimants to Taxi Drivers, Address Quality, Between Bodies		1	Not Opened	0	0	0	0	£0.00
49.1 High	Housing Benefit Claimants to Benefits Agency Deceased Persons, High Quality, Within Bodies		11	Opened	11	0	0	0	£0.00
78 Info	Payroll to Pensions, High Quality, Between Bodies		1	Opened	0	1	0	0	£0.00
80 High	Payroll to Creditors, Same Bank Account, Within Bodies		26	Not Opened	0	0	0	0	£0.00
81 Low	Payroll to Creditors, Address Quality, Within Bodies		1	Not Opened	0	0	0	0	£0.00
91 High	Housing Benefit Claimants to Waiting List, High Quality, Between Bodies		20	Not Opened	0	0	0	0	£0.00
172.3 High	Resident Parking Permit to Benefits Agency Deceased Persons, High Quality, Within Bodies		1	Not Opened	0	0	0	0	£0.00

IMPORTANT : This summary includes matches that occurred in previous years.

Appendix D – National Fraud Initiative – Biennial Exercise

NATIONAL FRAUD INITIATIVE 2024/2025

AUTHORITY SUMMARY: Tonbridge & Malling Borough Council

29-Sep-2025

No.	Report Name	Total Recommended	Total All	Status	Processed	In Progress	Frauds	Errors	Savings
240 High	Waiting List to Housing Benefit Claimants, High Quality, Within Bodies		1	Not Opened	0	0	0	0	£0.00
241 High	Waiting List to Housing Benefit Claimants, High Quality, Between Bodies		2	Not Opened	0	0	0	0	£0.00
257 High	Waiting List to Waiting List, High Quality, Between Bodies		2	Not Opened	0	0	0	0	£0.00
261 High	Waiting List to Benefits Agency Deceased Persons, High Quality, Within Bodies		2	Not Opened	0	0	0	0	£0.00
435 High	Council Tax Reduction Scheme to Payroll, High Quality, Within Bodies		2	Not Opened	0	0	0	0	£0.00
436 High	Council Tax Reduction Scheme to Payroll, High Quality, Between Bodies		58	Not Opened	0	0	0	0	£0.00
436.1 High	Council Tax Reduction Scheme to Pensions, High Quality, Between Bodies		64	Not Opened	0	0	0	0	£0.00
440 Low	Council Tax Reduction Scheme to Payroll, Address Quality, Between Bodies		6	Not Opened	0	0	0	0	£0.00
440.1 Low	Council Tax Reduction Scheme to Pensions, Address Quality, Between Bodies		2	Not Opened	0	0	0	0	£0.00
446 High	Council Tax Reduction Scheme to Council Tax Reduction Scheme, High Quality, Between Bodies		3	Not Opened	0	0	0	0	£0.00

IMPORTANT : This summary includes matches that occurred in previous years.

Appendix D – National Fraud Initiative – Biennial Exercise

NATIONAL FRAUD INITIATIVE 2024/2025

AUTHORITY SUMMARY: Tonbridge & Malling Borough Council

29-Sep-2025

No.	Report Name	Total Recommended	Total All	Status	Processed	In Progress	Frauds	Errors	Savings
450 High	Council Tax Reduction Scheme to Housing Tenants, High Quality, Between Bodies		1	Not Opened	0	0	0	0	£0.00
456 Medium	Council Tax Reduction Scheme to Right to Buy, Medium Quality, Between Bodies		1	Not Opened	0	0	0	0	£0.00
459.1 High	Council Tax Reduction Scheme to Taxi Drivers, High Quality, Within Bodies		7	Not Opened	0	0	0	0	£0.00
459.2 High	Council Tax Reduction Scheme to Taxi Drivers, High Quality, Between Bodies		4	Not Opened	0	0	0	0	£0.00
459.6 Low	Council Tax Reduction Scheme to Taxi Drivers, Address Quality, Between Bodies		2	Not Opened	0	0	0	0	£0.00
476 High	Council Tax Reduction Scheme to Housing Benefit Claimants, High Quality, Within Bodies		4	Not Opened	0	0	0	0	£0.00
477 High	Council Tax Reduction Scheme to Housing Benefit Claimants, High Quality, Between Bodies		4	Not Opened	0	0	0	0	£0.00
480 High	Housing Benefit Claimants to Council Tax Reduction Scheme, High Quality, Between Bodies		3	Not Opened	0	0	0	0	£0.00
482 High	Council Tax Reduction Scheme to Benefits Agency Deceased Persons, High Quality, Within Bodies		15	Opened	15	0	0	0	£0.00

IMPORTANT : This summary includes matches that occurred in previous years.

Appendix D – National Fraud Initiative – Biennial Exercise

NATIONAL FRAUD INITIATIVE 2024/2025

AUTHORITY SUMMARY: Tonbridge & Malling Borough Council

29-Sep-2025

No.	Report Name	Total Recommended	Total All	Status	Processed	In Progress	Frauds	Errors	Savings
483 High	Council Tax Reduction Scheme to HMRC Property Ownership		49	Not Opened	0	0	0	0	£0.00
483.1 High	Council Tax Reduction Scheme to HMRC Earnings and Capital		58	Not Opened	0	0	0	0	£0.00
483.2 High	Council Tax Reduction Scheme to HMRC Household Composition		385	Not Opened	0	0	0	0	£0.00
701 High	Duplicate creditors by creditor name		22	Not Opened	0	0	0	0	£0.00
702 High	Duplicate creditors by address detail		72	Not Opened	0	0	0	0	£0.00
703 High	Duplicate creditors by bank account number		29	Not Opened	0	0	0	0	£0.00
708 High	Duplicate records by invoice amount and creditor reference		300	Not Opened	0	0	0	0	£0.00
709 High	VAT overpaid		8	Not Opened	0	0	0	0	£0.00
711 High	Duplicate records by supplier invoice number and invoice amount but different creditor reference and name		5	Not Opened	0	0	0	0	£0.00
713 High	Duplicate records by postcode, invoice amount but different creditor reference and supplier invoice number and invoice date		1	Not Opened	0	0	0	0	£0.00
750 High	Procurement - Payroll to Companies House (Director), High Quality, Within Bodies		4	Not Opened	0	0	0	0	£0.00

IMPORTANT : This summary includes matches that occurred in previous years.

Appendix D – National Fraud Initiative – Biennial Exercise

NATIONAL FRAUD INITIATIVE 2024/2025

29-Sep-2025

AUTHORITY SUMMARY: Tonbridge & Malling Borough Council

No.	Report Name	Total Recommended	Total All	Status	Processed	In Progress	Frauds	Errors	Savings
9999 Info	Individuals who appear on more than one of the standard reports		9	Not Opened	0	0	0	0	£0.00
TOTAL			1191		27	1	0	0	0.00

IMPORTANT : This summary includes matches that occurred in previous years.

Appendix E – National Fraud Initiative – Annual Exercise

TMBC 25/26 Quarter 2 – Annex E

ID	Report Title	Total All	Status	Processed	In Progress	Frauds	Errors	Outcome	Co Estimates	Overall Total	Quality
801	C Council Tax to Electoral Register	938	No Comments	138	23	0	34	£58,807.91	£38,254.88	£97,062.79	High
804	↔ Council Tax to All Datasets	938	No Comments	0	0	0	0	£0.00	£0.00	£0.00	High
805	C ↗ Council Tax to DDFI Deceased Persons	251	No Comments	231	1	0	0	£0.00	£0.00	£0.00	High
815.2	↔ ↗ Council Tax to HMRC Household Composition	961	?	Opened	6	1	0	£2,006.00	£1,721.60	£3,729.60	High
TOTAL		3,088		375	25	0	35	£60,815.91	£39,976.48	£100,792.39	

Introduction & Key Messages

Resources

Internal Audit Plan

Quality Assurance and Improvement Programme

Issue Implementation

Counter Fraud Update

[Appendix A - Summaries](#)

Appendix B – Internal Audit Plan Status

Appendix C - Definitions

Appendix D – National Fraud Initiative – Biennial Summary

[Appendix E – National Fraud Initiative – Annual Summary](#)

Appendix F – Kent Intelligence Network

Appendix G – Fraud Referrals

[Appendix H – Quarterly Return](#)

Appendix F – Kent Intelligence Network

Kent Intelligence Network

Referrals
New

89

Referrals
Closed

80

Awaiting
Decision

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2025-26

2024-25

Q1

Q2

Q3

Q4

Financial Year	Financial Quarter	Origin Match	Accounts Adjusted	Discount Removed Current Year	Discount Removed Previous Years		Penalties	Future Loss	Funds Being Recovered
					£31,208.14	£11,914.31			
2025-26	Q2	NFI - electoral register	22	£12,790.34	£31,208.14	£1,050	£13,106.55	£43,998.48	
2025-26	Q1	NFI - electoral register	17	£5,619.42	£11,914.31	£700	£5,007.67	£17,533.73	
2025-26	Q2	NFI - HMRC	1	£860.80	£1,077.20	£70	£860.80	£1,938.00	
2025-26	Q1	Internal referral	2	£1,020.27	£234.96		£1,019.59	£1,255.23	
Total			42	£20,290.83	£44,434.61	£1,820	£19,994.61	£64,725.44	

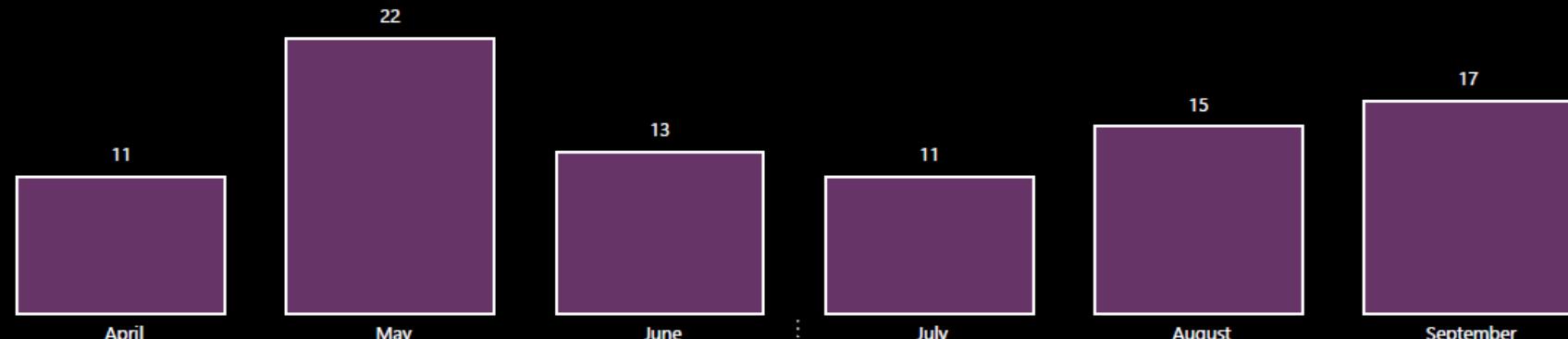
Deselect all

Internal referral

NFI - electoral register

NFI - HMRC

New Referrals



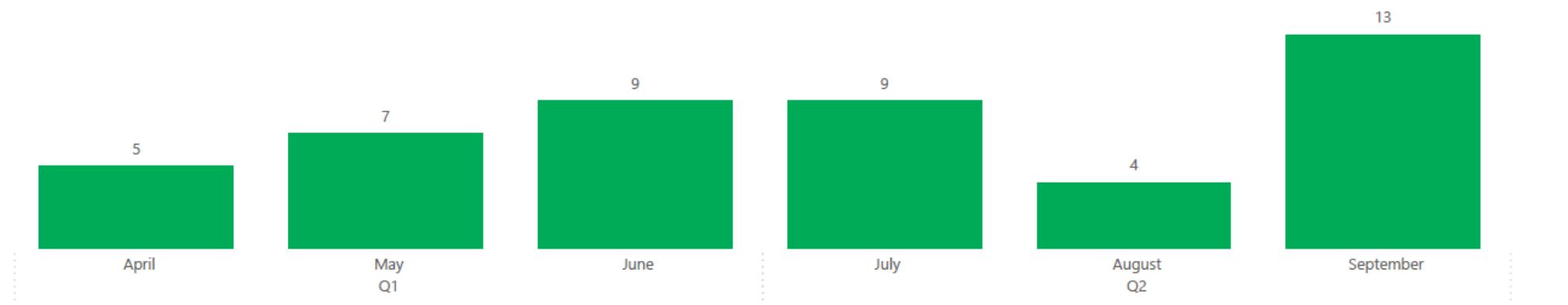
2025-26

Appendix G – Fraud Referrals Carried Forward

Tonbridge & Malling - Quarterly Return

Total Referrals	Referrals B/F	New Referrals	Open Referrals	Closed Referrals	Under Investigation	Awaiting Sifting	% Referrals Closed
83	36	47	48	35	20	1	42%

Referrals by Month



Losses

Financial Quarter	Sum of Actual Loss	Sum of Potential Loss	Sum of Recovered Loss	Sum of Prevented Loss
Q1	28,644	£63,975.77	£27,384	£27,084
Q2	0	£74,205.21	£3,987	£54,463
Total	28,644	£138,180.98	£31,371	£81,547

Prevented Loss



2024-25

2025-26

Q1

Q2

Q3

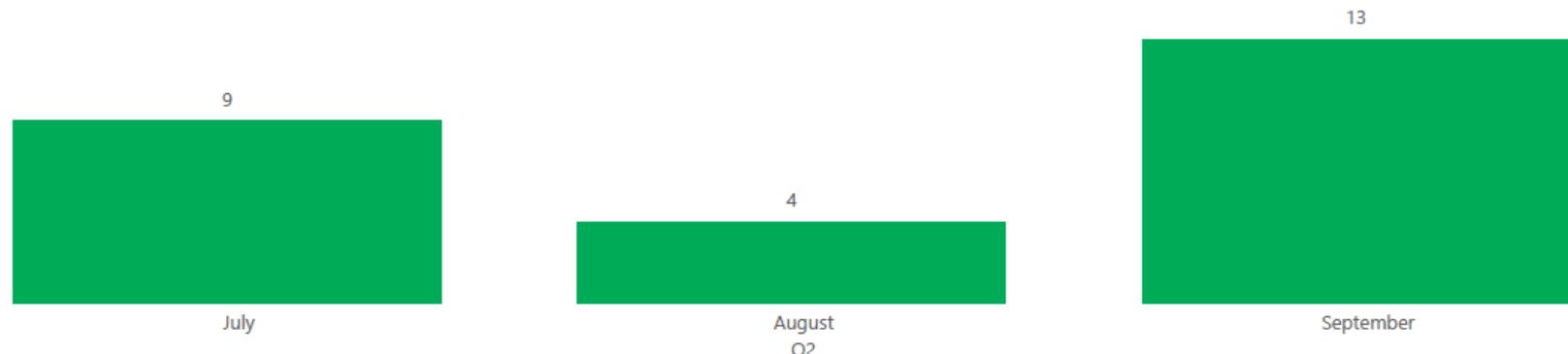
Q4

Appendix H – New Fraud Referrals

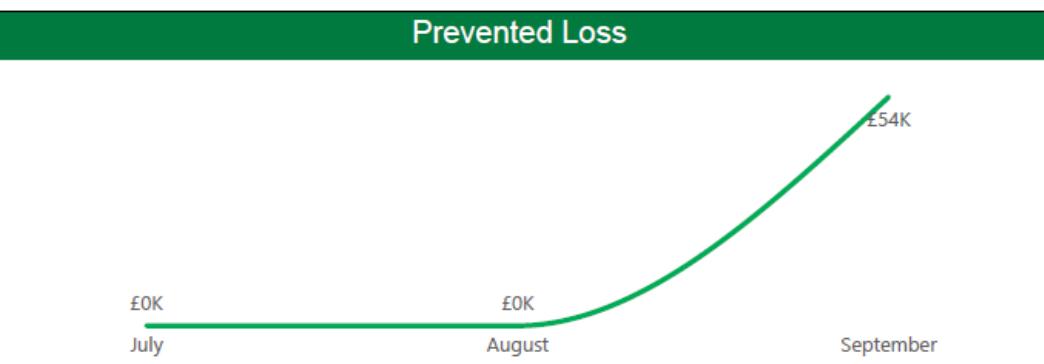
Tonbridge & Malling - Quarterly Return

Total Referrals	Referrals B/F	New Referrals	Open Referrals	Closed Referrals	Under Investigation	Awaiting Sifting	% Referrals Closed
83	57	26	48	19	18	1	23%

Referrals by Month



Losses				
Financial Quarter	Sum of Actual Loss	Sum of Potential Loss	Sum of Recovered Loss	Sum of Prevented Loss
Q2	0	£74,205.21	£3,987	£54,463
Total	0	£74,205.21	£3,987	£54,463



2024-25	2025-26	Q1	Q2	Q3	Q4
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