



**INTERNAL AUDIT AND COUNTER FRAUD  
PROGRESS REPORT  
AUDIT COMMITTEE  
13<sup>th</sup> April 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 January and March 2026.

# 2. Key Messages

- 4 audits have been finalised to final report in the period. The summaries are contained in **Appendix A**
- 11 of the 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 6 audits are in fieldwork, or have a fieldwork start date agreed, and 2 audits are in planning. The status of all audits on the 2025/26 plan is detailed in **Appendix B**
- The External Quality Assessment (EQA) is now complete, the assessor has evaluated KCC Internal Audit conformance against each of the 5 domains set out in the Global Internal Audit Standards. A report has now been provided to the Head of Internal Audit and is being reviewed for factual accuracy, both the report and any subsequent action plans developed will be presented at a future Audit Committee.
- 5 members of the Internal Audit Team have now completed their MSc in Internal Audit Management and Consultancy.

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## 3. Resources

In accordance with the Global Internal Audit Standards, Members need to be appraised 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, this is expected to be completed in October 2026.
- There is currently one auditor vacancy, a recruitment exercise will commence shortly.
- 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 recently appointed Data Analyst has been developing dashboards to aid with tracking audit delivery progress and monitoring audit budget utilisation.
- The use of Artificial Intelligence continues to be actively explored to create efficiencies and enhance delivery. Full team training is being developed in how to utilise AI in all stages of the audit process including the development of AI Agents to assist with specific tasks.

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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	0	0%
Planning	2	9.52%
Fieldwork	6	28.57%
Ongoing	2	9.52%
Draft Report	2	9.52%
Final Report	7	33.33%
On Hold	0	0%
Removed/ Deferred	2	9.52%
<b>Total</b>	<b>21</b>	<b>100%</b>

**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 13th April 2026				
Ref	Audit	Status	Assurance	Prospects for Improvement
TM16-2026	Corporate Credit Cards	Complete	Adequate	Good
TM14-2026	Housing Condition	Complete	Substantial	Good
TM20-2026	AGILE Withdrawal	Draft Report	Adequate	TBC
TM08-2026	Local Plan – Project Management Approach	Draft Report	Substantial	TBC

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## 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 52 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) has concluded. Internal Audit completed a self-assessment of compliance with the Global Internal Audit Standards and this was reviewed by the assessor whilst evaluating conformance against each of the 5 domains set out in the Standards. A report has been provided to the Head of Internal Audit, both the report and any subsequent action plans developed will be presented at a future Audit Committee.

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## 6. Counter Fraud Update

### Prevention and Detection of Fraud, Bribery and Corruption

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

### National Fraud Initiative (NFI)

- 6.2 The Counter Fraud Team has collated the data specified by the Cabinet Office for the 2025/26 annual exercise. This includes reviewing the data to ensure it complies with the formats required and uploading in the required timescale.
- 6.3 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.
- 6.4 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.
- 6.5 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 **Appendix D** and a summary of the annual exercise is shown in **Appendix E**.
- 6.6 The annual exercise (Single Person Discount to Register of Electors) forms part of the Kent Intelligence Network activity, reported in section 1.1.8.
- 6.7 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.

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## 6. Counter Fraud Update

### Kent Intelligence Network (KIN)

6.8 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.

6.9 Q3 2025/26 the following results have been achieved:

- Single person discount reviews from fraud referrals increased council tax liability by £16,061. Total value of single person discounts removed during Q3 is £43,529.
- The 2025/26 rolling total single person discounts removed £36,055, with increased liability totalling £108,255. Shown in **Appendix F**.
- Unrated businesses, 8 new cases are being assessed before potential referral to 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, 5 new cases are being assessed before potential referral to the valuation office to assess liability.
- The 2025/26 rolling total cases are 32 with 4 being closed with no further action. There are 7 cases currently awaiting the valuation office to assess liability. There are 21 cases being assessed before potential referral to the valuation office to assess liability.
- The 2025/26 rolling total of debtors being traced is 169, resulting in £478,347 of debt that can be actively pursued for further recovery action.

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## 6. Counter Fraud Update

### Investigating Fraud, Bribery and Corruption

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

6.11 A total of 41 new referrals have been received by the Counter Fraud Team in Q3 2025/26. The most reported fraud type involves Council Tax Reduction and DWP benefits, such as Housing Benefits and/ or universal credit, totalling 15 referrals.

6.12 The second most reported fraud type is Single Person Discount on council tax, where a total of 14 referrals have been reported. Further detail is available in **Appendix H**.

6.13 Q3 2025/2026, 39 referrals have been closed.

- 10 closed - error identified and corrected with a recoverable value of £23,211.
- 12 referrals sent to partner agency, DWP.
- 9 referrals closed no further action / investigation complete / insufficient evidence.
- 7 financial recovery only, with a recoverable value of £7,195.
- 1 referred to partner agency.

6.14 A total of 50 cases from 2025/26 are currently open and live.

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

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### TM16-2026 Corporate Credit Cards

#### Audit Objective

As part of the 2025/26 Audit Plan, it was agreed that Internal Audit will undertake a review of Corporate Credit Cards. The aim of the audit is to provide assurance that adequate controls are in place to ensure that there is appropriate use of Corporate Credit Cards.

The scope included: Review of the associated policy and procedure documents; Policy communication & cardholder acceptance; Purchase card register; Expenditure testing; and reconciliation.

#### Scope Limitations

None

#### Key Strengths

Documented Acknowledgements	All sampled cardholders had completed and signed the required acknowledgements, demonstrating adherence to the expected confirmation of responsibilities and guidance.
Forms Accessibility	Request and purchase forms, along with the guidance and user agreement document are easily accessible to staff, ensuring they can readily obtain the documentation needed to support new card issuance and purchasing requests.
Clear Cardholder Register	The cardholder register is clearly presented and easy to understand, with defined limits that support transparency and effective oversight of Corporate Credit Card arrangements.
Segregation of Duties	Strong segregation of duties is in place, ensuring that no single individual can complete all stages of the Corporate Credit Card process, thereby support robust internal control and reduce the risk of error or misuse.
Appropriateness of Suppliers	Internal Audit deemed that the suppliers reviewed were appropriate and reasonable within a local authority setting, reflecting suitable and legitimate categories of spend.
Invoice Tracking System	The automatic invoice tracking system provides strong transparency and traceability across all stages of the invoicing process, while also supporting further segregation of duties through clearly documented workflows and visibility of actions taken.

#### Audit Opinion

Adequate

#### Prospects for Improvement

Good

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

#### Areas For Development

Medium	The governance framework and supporting documentation for Corporate Credit Card use are incomplete, unclear, and not structured in a way that supports consistent and compliant application of processes.
Medium	Corporate Credit Card usage is not always supported by adequate business justification or timely pre-purchase approval, and alternative procurement routes are not consistently evidenced as having been considered.
Medium	Reconciliation processes are not consistently timely, and the absence of a formal escalation procedure for missing documentation limits the effectiveness of oversight.
Low	Cardholder Agreements, pre-purchase approval steps, and card request processes are not applied consistently, resulting in gaps in documentation and procedural compliance.
Low	Leaver processes for Corporate Credit Card administration lack formal documentation and consistency, including delays in access removal, inconsistent evidence of card destruction, and no review of inactive cards.
Low	There is no structured training or periodic re-acknowledgement process to ensure cardholders remain up to date with their responsibilities and procedural requirements.

# TM14-2026 Housing Conditions

**Audit Objective**

As part of the 2025/2026 Audit Plan, it was agreed that Internal Audit would review TMBC's housing condition management and enforcement responsibilities across three key areas: Enforcement of housing conditions in the private rented sector, oversight of housing conditions in the social housing sector and housing conditions in temporary accommodation (TA) (TMBC-owned/leased).

The aim of the audit was to provide assurance that TMBC has effective controls to identify, assess, and respond to poor housing conditions, in compliance with statutory duties and aligned with best practice. The scope of the audit included: Data and intelligence gaps, complaint and service request management, and Tenant engagement and reporting.

**Scope Limitations**

None

## Key Strengths

Data and Intelligence	Robust and well-maintained data underpins TA, Homelessness, PRS and social housing services, supported by reliable documentation practices and systems like Huume and Uniform that ensure accuracy and consistency. Clear future planning through the Draft 2026 Housing Stock Modelling Specification, alongside structured Housing Solutions performance reporting, demonstrates strong oversight of operational pressures and a positive trajectory for improved borough-wide housing intelligence.
Complaint and Service Request Management	Policies, roles, and responsibilities across Private Sector Housing, Social Housing, and Temporary Accommodation are well defined, ensuring consistent triage, escalation, and case handling in line with statutory requirements. Sample testing shows that TA repairs and compliance issues are actively managed with no stagnant cases, supported by strong operational oversight through Huume dashboards that keep actions open until fully resolved.
Tenant Engagement and Reporting	Tenants across TA, Private Sector Housing and Social Housing receive clear and accessible information on how to report property condition concerns, supported by TA packs, sign-in agreements, noticeboards, assisted reporting and tailored communication for vulnerable residents. Huume records safeguarding and support needs, while officers consistently document internal actions, contractor engagement and decision-making to ensure transparency and effective case management.

Audit Opinion	Prospects for Improvement
<b>Substantial</b>	<b>Good</b>

Actions	Number	Agreed	Risk Accepted
<b>High</b>	0	0	0
<b>Medium</b>	0	0	0
<b>Low</b>	3	2	1

## Areas For Development

<b>Low</b>	The Council relies on periodic stock condition modelling—rather than address-level data—to provide strategic, borough-wide insight, meaning it does not produce routine housing condition dashboards or KPIs for private rented or social housing stock, which is a deliberate and proportionate approach given it is not the landlord. In contrast, Temporary Accommodation benefits from strong operational oversight through live Huume dashboards and regular management review, reflecting the Council's direct responsibility for this stock.
<b>Low</b>	The IDOX/Uniform system lacks the workflows, controls, and automation needed for consistent case management, meaning officers rely on manual updates and oversight is limited, though the Council recognises these constraints and considers major investment disproportionate ahead of Local Government Reorganisation.
<b>Low</b>	Although operational practice is consistent, the Council lacks standalone written guidance for recording, triaging and escalating housing condition concerns, leaving staff reliant on tacit knowledge and Huume workflows that do not fully explain how system-generated tasks should be interpreted or prioritised, especially in complex cases.

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## TM20-2026 AGILE Withdrawal

<b>Audit Objective</b>	As part of the 2025/2026 Audit Plan, it was agreed that Internal Audit would review whether the Agile withdrawal project was being effectively governed and managed, including whether key lessons learned from the 2025 Agile implementation had been applied. The audit also aimed to evaluate whether data migration back to Idox was controlled, secure, and of acceptable quality, with appropriate user access and system security measures in place. Additionally, the audit sought to confirm whether the project was on track to deliver expected benefits and whether any risks to successful completion were being appropriately managed.
<b>Scope Limitations</b>	None

Audit Opinion		Prospects for Improvement	
<b>Adequate</b>		<b>TBC</b>	
Actions	Number	Agreed	Risk Accepted
<b>High</b>	1	TBC	TBC
<b>Medium</b>	4	TBC	TBC
<b>Low</b>	2	TBC	TBC

### Key Strengths

<b>Governance and oversight</b>	The project was supported by a well-documented business case, regular Strategic Board and Steering Group meetings, and consistently recorded decisions and progress.
<b>Project Management Practices</b>	Comprehensive status reporting, embedded corporate project management standards, and the use of Gantt plans provided clear visibility of timelines, dependencies and risks.
<b>Data migration assurance</b>	The project used a disciplined ETL approach and multiple cycles of user acceptance testing (UAT) to verify data accuracy against real operational processes.
<b>Risk, issue and change control</b>	Structured RAIC/issue logging, incremental testing cycles, and a formal Transform methodology ensured controlled change management and reliable data transformation and validation.

### Areas For Development

<b>Idox password complexity</b>	Idox is not currently configured to enforce a sufficient degree of password security
<b>Lessons Learned and Benefits Realisation</b>	There is a recognised need for a structured lessons learned review to be completed for this project, following completion, in order to ensure that appropriate lessons arising are captured and documented. There should also be a benefits assessment exercise completed.
<b>Idox Role Profiles and Access Permissions</b>	There is a need to review user accounts and rationalise application role profiles and user access permissions within Idox as these have increased in number and complexity over time
<b>Resource Planning</b>	At one stage the project suffered delays due to a single senior systems analyst who possessed unique database knowledge not being available to the project having been temporarily assigned to other more urgent work.
<b>Further Assurance Required</b>	There were a number of areas Internal Audit was not able to provide full assurance on within the timescale of the audit due to the limited availability of some staff/ resources during the data migration work. It is recommended that management review these areas to ensure the controls are operating effectively.

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## TM08-2026 Local Plan – Project Management Approach

**Audit Objective**

This audit reviewed the governance, risk management and project management arrangements supporting the development of the Local Plan, whilst the Local Plan project was in progress. The audit did not assess the technical planning merits of the Plan itself.

Whilst Internal Audit provides assurance on the governance, risk management and project management controls, the audit has recognised that there is still a significant amount of work to be completed before the Plan can be submitted, and there are still further risks which could impact and or delay submission. Including a tight timetable and new emerging risks which have been identified by the service. The assurance rating provided should therefore be considered in this context.

**Scope Limitations** None

### Key Strengths

Governance and oversight	Clear structures, defined roles, regular reporting, and effective escalation processes ensure the Local Plan is well-scrutinised and strategically directed.
Project Planning & Resource management	A detailed project plan aligned to statutory milestones is in place, supported by proactive resource planning, timely access to specialist support, and close monitoring of workloads.
Risk Management	A documented and regularly reviewed risk register captures key delivery, political, financial, and external risks with clear monitoring and mitigation arrangements.
Stakeholder engagement and monitoring	Established consultation strategies, multiple channels for engagement, and strong milestone-based monitoring and reporting ensure transparency and informed decision-making.

Audit Opinion	Prospects for Improvement
Substantial	TBC

Actions	Number	Agreed	Risk Accepted
High	0	N/A	N/A
Medium	0	N/A	N/A
Low	3	TBC	TBC

### Areas For Development

Local Plan training attendance is not evidenced	Attendance at Local Plan officer and Member training sessions is not formally recorded
Target Risk Levels not defined	Target risk scores and an explicit articulation of risk appetite are not currently illustrated in the Local Plan Risk Register
Absence of a formal Quality Assurance Framework	Quality assurance over the Local Plan currently relies on informal internal review and targeted external input (including PAS assurance on soundness and examination readiness), with no formally documented framework setting out how ongoing compliance with the SCI, Engagement Strategy and statutory requirements will be obtained.

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## 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
TM16-2026	Corporate Credit Cards	Complete	Adequate	Good	Apr-26
TM14-2026	Housing Condition	Complete	Substantial	Good	Apr-26
TM20-2026	AGILE Withdrawal	Draft Report	Adequate	TBC	Apr-26
TM08-2026	Local Plan – Project Management Approach	Draft Report	Substantial	TBC	Apr-26
TM07-2026	Waste Contract Re-tender	Fieldwork			
TM19-2026	GDPR - Record Retention	Fieldwork			
TM17-2026	IT Cyber Security	Fieldwork			
TM18-2026	EDI	Fieldwork			
TM21-2026	Community Governance Review on Tonbridge Town Council	Fieldwork			
TM22-2026	Annual Service Delivery Plans (Addition January 2026)	Fieldwork - Scheduled			
TM10-2026	Angel Centre	Planning			
TM09-2026	Town Centre	Planning			
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**

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.

Processes are robust and well-established. There is a sound system of control operating effectively and consistently applied to achieve service/system objectives.

There are examples of best practice. No significant weaknesses have been identified.

**Limited**

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.

Certain weaknesses require immediate management attention as there is a high risk that objectives are not achieved.

**Substantial**

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.

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.

**No Assurance**

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.

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

**Adequate**

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.

There are some significant matters that require management attention with moderate impact on residual risk exposure until resolved.

Prospects for Improvement		Issue Risk Ratings	
<b>Very Good</b>	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.	<b>High</b>	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.
<b>Good</b>	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.	<b>Medium</b>	There are weaknesses in internal control arrangements which lead to a moderate risk of non-achievement of service or system objectives.
<b>Adequate</b>	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	<b>Low</b>	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.
<b>Uncertain</b>	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**

**17-Dec-2025**

**AUTHORITY SUMMARY:** Tonbridge & Malling Borough Council

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		3	Opened	1	0	0	0	£0.00
27 High	Housing Benefit Claimants to Housing Benefit Claimants, High Quality, Between Bodies		1	Closed	1	0	0	0	£0.00
31 High	Housing Benefit Claimants to Housing Tenants, High Quality, Between Bodies		3	Closed	3	0	0	0	£0.00
47.6 Low	Housing Benefit Claimants to Taxi Drivers, Address Quality, Between Bodies		1	Closed	1	0	0	0	£0.00
49.1 High	Housing Benefit Claimants to Benefits Agency Deceased Persons, High Quality, Within Bodies		11	Closed	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	Closed	26	0	0	0	£0.00
81 Low	Payroll to Creditors, Address Quality, Within Bodies		1	Closed	1	0	0	0	£0.00
91 High	Housing Benefit Claimants to Waiting List, High Quality, Between Bodies		20	Opened	5	15	0	0	£0.00
172.3 High	Resident Parking Permit to Benefits Agency Deceased Persons, High Quality, Within Bodies		1	Closed	1	0	0	0	£0.00

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

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**17-Dec-2025**

**AUTHORITY SUMMARY:** Tonbridge & Malling Borough Council

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	Closed	2	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	Opened	35	17	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

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### NATIONAL FRAUD INITIATIVE 2024/2025

17-Dec-2025

**AUTHORITY SUMMARY:** Tonbridge & Malling Borough Council

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	Closed	15	0	0	0	£0.00

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**NATIONAL FRAUD INITIATIVE 2024/2025**

**17-Dec-2025**

**AUTHORITY SUMMARY:** Tonbridge & Malling Borough Council

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	Opened	22	0	0	0	£0.00
702 High	Duplicate creditors by address detail		72	Closed	72	0	0	0	£0.00
703 High	Duplicate creditors by bank account number		29	Closed	29	0	0	0	£0.00
708 High	Duplicate records by invoice amount and creditor reference		300	Closed	300	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	Closed	5	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	Closed	1	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.

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### NATIONAL FRAUD INITIATIVE 2024/2025

17-Dec-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		10	Not Opened	0	0	0	0	£0.00
<b>TOTAL</b>			<b>1194</b>		<b>531</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>0.00</b>

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## Appendix E – National Fraud Initiative – Annual Summary

NFI ReCheck

17-Dec-2025

**AUTHORITY SUMMARY:** Tonbridge & Malling Borough Council

No.	Report Name	Total Recommended	Total All	Status	Processed	In Progress	Frauds	Errors	Savings
801 High	Council Tax single persons discount to Electoral Register	0	1848	Not Opened	390	28	0	56	£98814.01
802 High	Council Tax rising 18s	0	30	Not Opened	0	0	0	0	£0.00
803 High	Council Tax to Other Datasets	0	2345	Not Opened	0	0	0	0	£0.00
804 High	Council Tax to All Datasets	0	938	Not Opened	0	0	0	0	£0.00
805 High	Council Tax to DDRI Deceased Persons, High Quality, Within Bodies	0	312	Not Opened	231	1	0	0	£0.00
815.2 High	Council Tax to HMRC Household Composition	0	961	Opened	7	1	0	1	£2008.00
<b>TOTAL</b>		<b>0</b>	<b>6434</b>		<b>628</b>	<b>30</b>	<b>0</b>	<b>57</b>	<b>100822.01</b>

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

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# Appendix F – Kent Intelligence Network

**Referrals**  
New

**144**

**Referrals**  
Closed

**134**

**Awaiting Decision**

**1**

Financial Year	Financial Quarter	Origin Match	Accounts Adjusted	Discount Removed Current Year	Discount Removed Previous Years	Penalties	Future Loss	Funds Being Recovered
2025-26	Q2	NFI - electoral register	22	£12,790.34	£31,208.14	£1,050	£13,106.55	£43,998.48
2025-26	Q3	NFI - electoral register	26	£14,389.79	£29,139.81	£1,050	£16,061.01	£43,529.60
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
<b>Total</b>			<b>68</b>	<b>£34,680.62</b>	<b>£73,574.42</b>	<b>£2,870</b>	<b>£36,055.62</b>	<b>£108,255.04</b>

Deselect all

Internal referral

NFI - electoral register

NFI - HMRC

2025-26

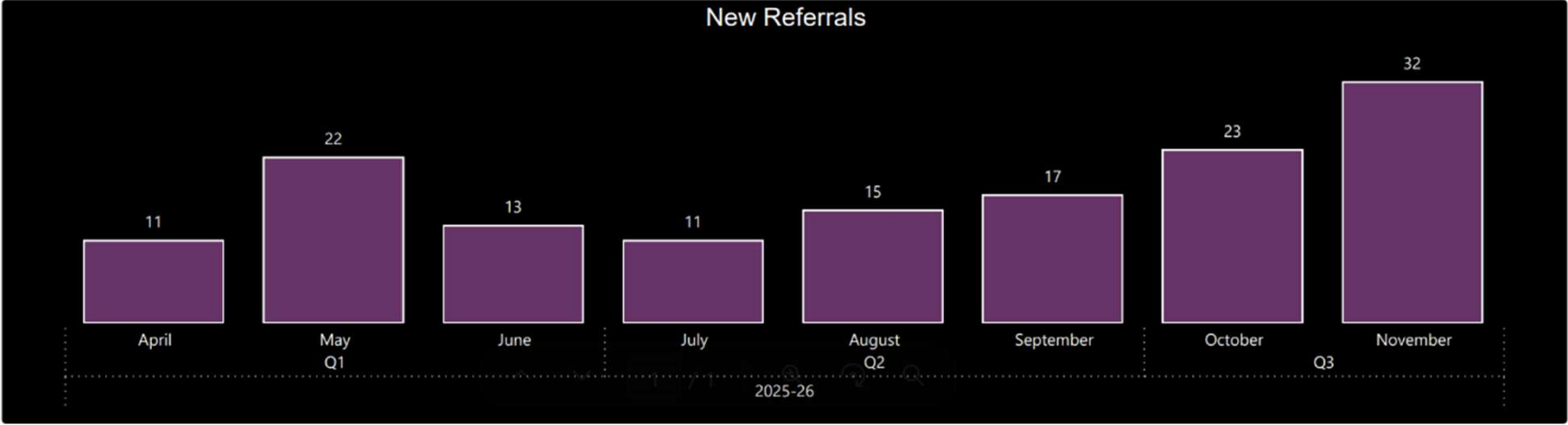
2024-25

Q1

Q2

Q3

Q4



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# Appendix G – Fraud Referrals

Total Referrals	Referrals B/F	New Referrals	Open Referrals	Closed Referrals	Under Investigation	Awaiting Sifting	% Referrals Closed
124	83	41	50	39	12	0	31%

Investigations completed within 3 months
3

Investigations completed within 3 - 6 months
2

Investigations completed over 6 months
5

All cases closed within 6 months
28

Percentage cases closed within 6 months
72%

All cases closed over 6 months
10

Percentage of referrals sifted within 10 days
73%

### Value Recovered from Investigations

Category	Value Recovered
Housing benefit / UC	£23K
Single person discount	£3K
Council tax reduction	£3K
Housing waiting list	£1K
Council tax discount / exemption	£0K
Homeless applications	£0K
Other	£0K

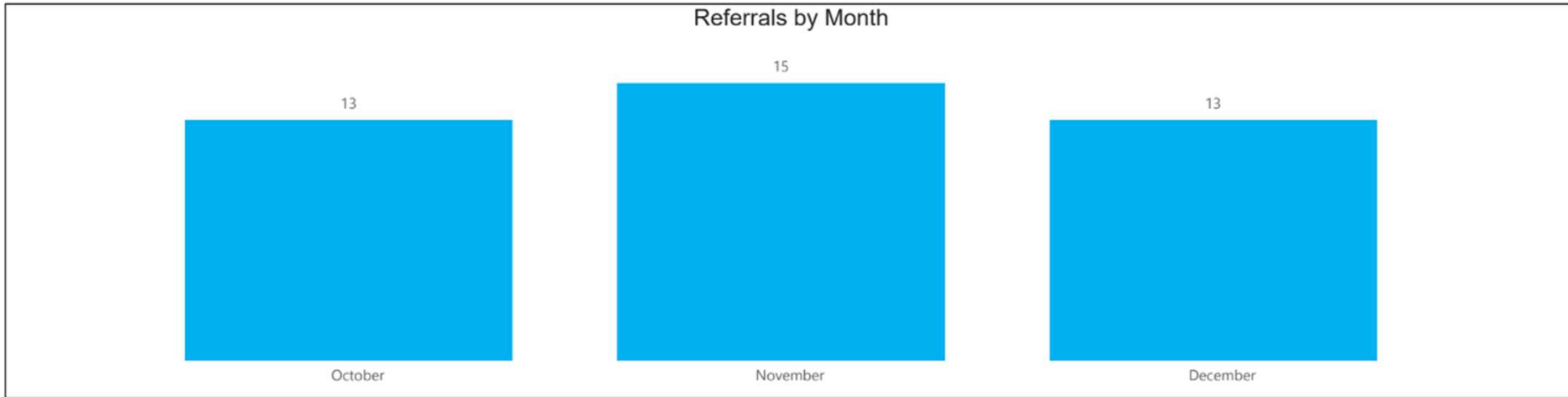
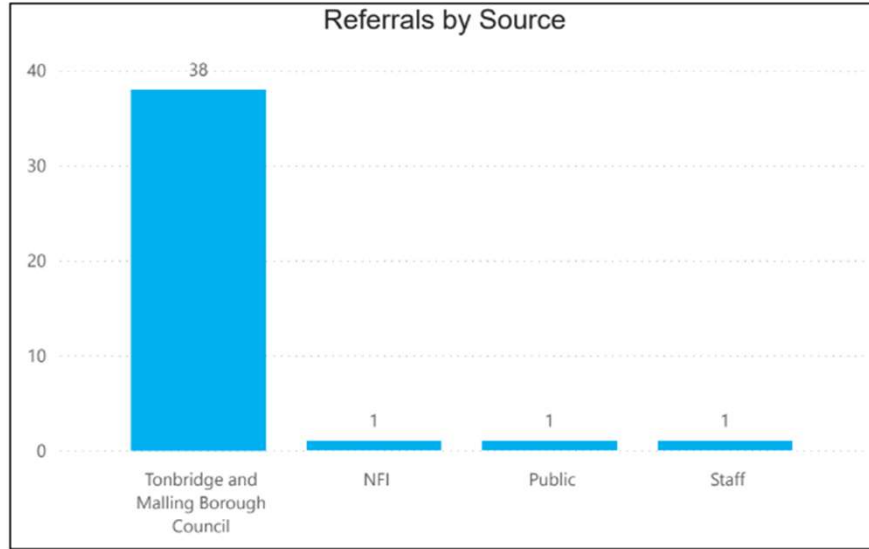
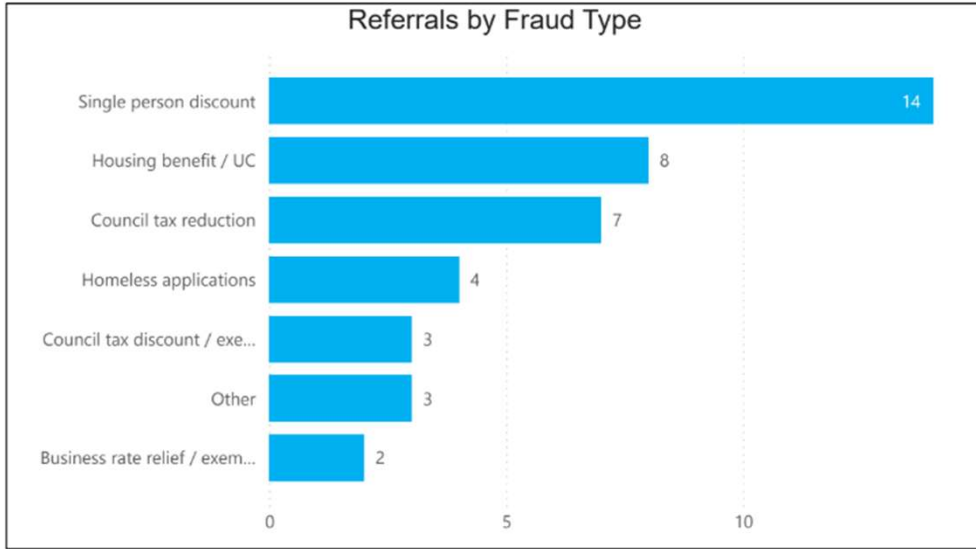
### Investigation Results

Category	Financial recovery only	Investigation complete	No further action	Overloaded to DWP Only	Referred to partner agency
Housing benefit / UC	1	3	3	6	0
Single person discount	3	1	2	3	0
Other	1	3	2	0	1
Council tax reduction	1	1	1	3	0
Council tax discount / exemption	0	1	1	0	0
Homeless applications	0	1	0	0	0
Housing waiting list	1	0	0	0	0

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# Appendix H – Quarterly Return



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