

Counter Fraud Plan 2026/27

Activity	Detail	Responsible Officer
Govern	Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation.	
Anti-fraud, Bribery and Corruption Policy	Complete a biennial review of the Anti-fraud, Bribery and Corruption Policy ensuring that the document aligns with the Fighting Fraud and Corruption Locally Strategy and best practice. The Policy will be presented and adopted at the Council's Governance and Audit Committee and will be supported by Senior Management.	Counter Fraud Lead
Counter Fraud Update, Audit Committee	A Counter Fraud update will be provided to the Audit Committee to demonstrate the activities undertaken by the Counter Fraud Team against the plan to prevent and detect Fraud, Bribery and Corruption.	Counter Fraud Lead
Acknowledge	An organisation must acknowledge and understand fraud risks and demonstrate this by having the right support and appropriate resource to tackle fraud.	
Fighting Fraud and Corruption Locally Checklist	The Counter Fraud Team to undertake an assessment of the authority against the Fight Fraud and Corruption Locally Checklist	Counter Fraud Lead
Fraud Risk Assessments	The Counter Fraud Team to undertake an assessment of current risk registers across the Council to identify if fraud risks have been identified and controls are in place to mitigate the risk. Including risks associated to the Economic Crime and Corporate Transparency Act (failure to prevent fraud).	Counter Fraud Lead
Relationship Management	Strengthening the anti-fraud culture within the organisation requires Counter Fraud to continue with relationship management meetings to report on emerging and current fraud risks identified through investigations.	Counter Fraud Team
Whistleblowing Hotline and log	The Counter Fraud Team manage the Councils Central Whistleblowing Log and the Whistleblowing helpline. The Team will request each quarter from each Director to report any Whistleblowing Complaints.	Counter Fraud Lead
Prevent	Fraud can be prevented and detected by making better use of information and technology, enhancing fraud controls and processes and developing a more effective anti-fraud culture	
Fraud Awareness	Deliver fraud awareness training to teams based on a training cycle to ensure that sessions delivered to officers occur every three years. The training will seek to raise awareness about new emerging fraud risks and current risks, continue to strengthen the anti-fraud culture (including failure to prevent fraud) and deliver messages about the standards expected of staff and the reporting of fraud and financial irregularities.	Counter Fraud Team
Internal Audit	The Counter Fraud Lead will meet with the Audit Manager to ensure any issues identified through investigations or Internal Audits are discussed	Counter Fraud Lead and Audit Manager
International Fraud Awareness Week Campaign	To deliver an internal campaign to officers during International Fraud Awareness week	Counter Fraud Lead
National Fraud Initiative	The Counter Fraud Team will lead on the NFI exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud. Resources will be allocated and based on specific expertise and knowledge – this means matches can be dealt with promptly. A nominated person from each of the data sets will be identified and liaised with.	Counter Fraud Team
Kent Intelligence Network	The Counter Fraud Team will review the data matches released through the Kent Intelligence Network. The key focus area for 2026/27 continues to look at fraud and error within Single Person Discounts, Small Business Rate Relief and unrated business premises.	Counter Fraud Manager and Intelligence
Pursue		
Investigations	The Counter Fraud Team will apply a risk-based approach to investigating all instances of actual, attempted and suspected fraud and financial irregularities. The Counter Fraud Team will ensure; <ul style="list-style-type: none"> • that any investigation is carried out in accordance with Council policy and procedures, key investigation legislation and best practice • the Council's disciplinary procedures will be used where the outcome of an investigation indicates improper behaviour by a Council employee Appropriate sanctions are applied.	Counter Fraud Manager
Partnership Working	To maintain and develop working with key partner agencies in the prevention and detection of fraud such as at the DWP, Kent Intelligence Network, Local Authorities, Kent Police as well as internal team within TMBC. Referrals will be recorded by source to identify progress on partnership working.	Counter Fraud Team