



COUNTER FRAUD PROGRESS REPORT 2024-25

01 April 2024 to 30 September 2024

Introduction

The roles of the Counter Fraud function are to:

- Receive, track and, where required, investigate financial irregularities (fraud and error) that occur within Kent County Council;
- Provide advice and support to management in mitigating the risk of financial irregularities occurring within their area; and
- Provide awareness and assess the risk of financial irregularities with management and front-line staff.

The Counter Fraud team work alongside Internal Audit as one function to support work in providing an 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 Governance and Audit Committee are asked to:

- Note the Counter Fraud progress report for 2024/25 and reported irregularities from April 2024 to 30 September 2024;
- Note the progress of the Counter Fraud Action Plan for 2024/25.
- Agree the areas of Counter Fraud coverage which may need to be reduced.

Key Messages

- Actual loss: Actual losses amount to £319,873 with the majority subject to full recovery;
- A rise in procurement referrals is showing a greater awareness of this risk within Directorates;
- Kent Intelligence Network (KIN) outcome for 2023/ 24 has identified £1.8m in additional Council Tax and Business Rates for KCC, and has identified £124,395 for the period 01 April 2024 to 30 June 2024;
- The biennial National Fraud Initiative is underway with data uploaded from key systems across KCC, the output from this is expected in December 2024;
- Counter Fraud Plan: Updates on progression against the Counter Fraud Plan can be found within the report and at **Appendix B**.

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Proactive Work - December 2023 to September 2024

Last Proactive update was January 2024.

Headline figures

21 - fraud related training sessions delivered.

741 - individuals trained.

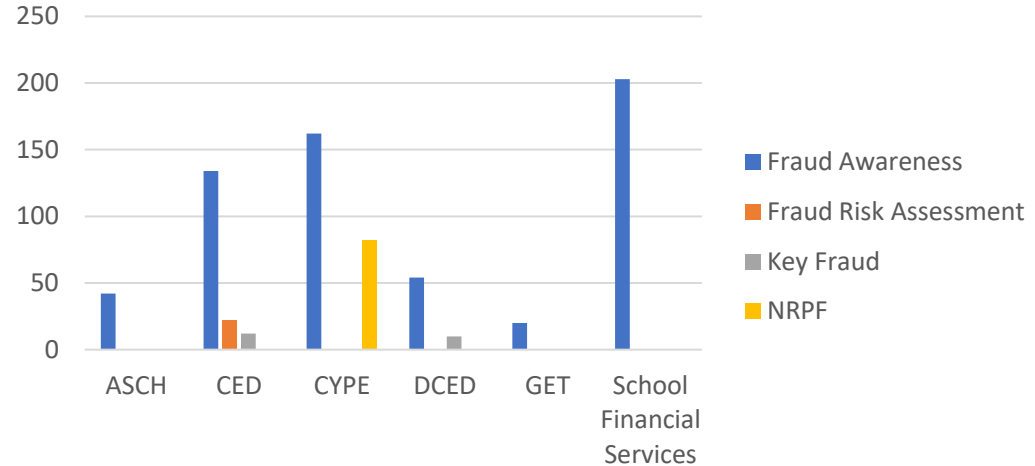
2 - Fraud Risk Assessments carried out.

Training

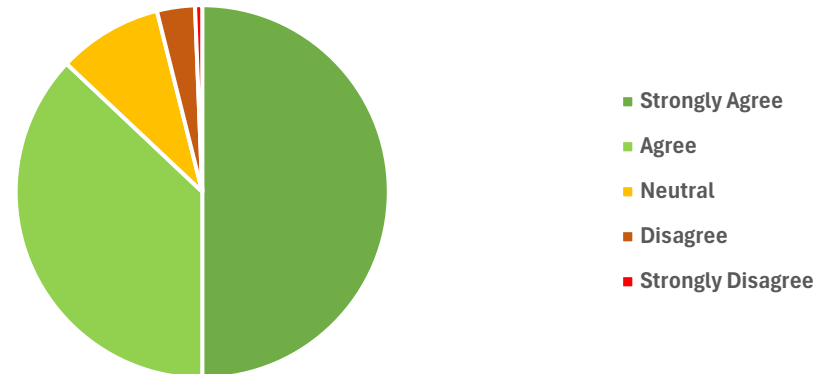
The majority of the proactive training has been around Fraud Awareness, with 615 individuals trained. This covers the three main fraud types of false representation, failure to disclose and abuse of position. The training then looks at the risks these pose to KCC. Bribery and corruption are also covered, including gifts and hospitality. NRPF was the next main topic of training requests received, with 82 Social Workers being trained within CYPE. An understanding of the Cabinet Office's new Fraud Risk Assessment process was given to 22 individuals as was presentations on Key Fraud risks to KCC.

Presentation Feed Back.

87% of responses either agreed or strongly agreed with the content and presentation. Only a combined total of 4% disagreed or strongly disagreed with the message and delivery of the material. This is a high indication that the content and delivery is pitched correctly.



Response Total %



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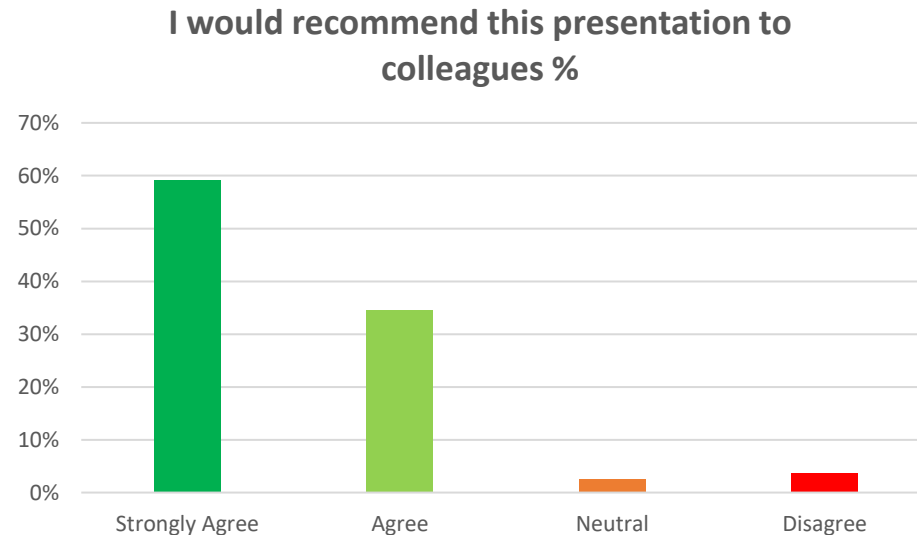
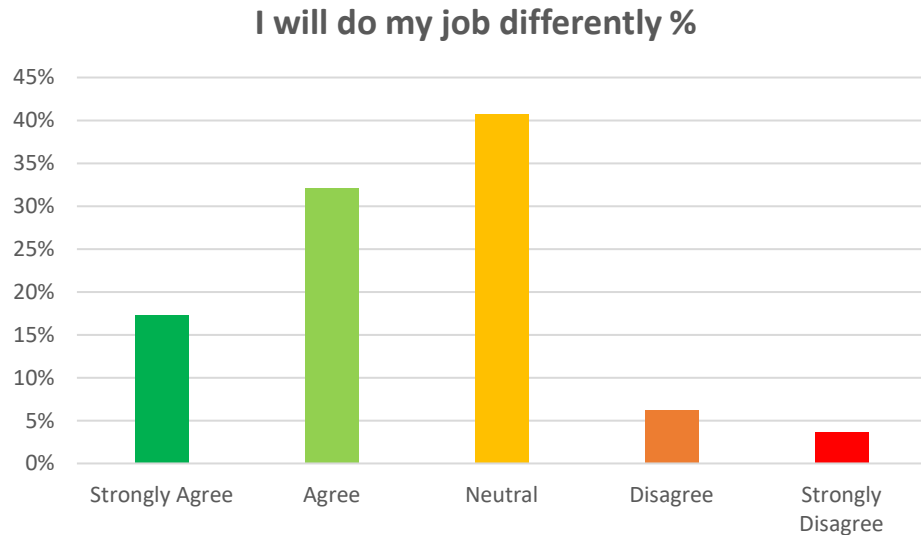
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Proactive Work - December 2023 to September 2024

Presentation Impact.

49% of individuals responding to the feedback stated they would do their job differently with the new Fraud Awareness knowledge, with 94% stating they would recommend the presentation to a colleague.



Fraud Risk Assessment.

The Cabinet Office along with the Government Counter Fraud Profession have brought out revised Fraud Risk Assessor Training. A member of the team has carried out two Fraud Risk Assessments (FRA), one with the Gypsy, Romany, Traveller Resident Service in GET and another with the grant team in CYPE. This has led to a total review of the planning, conducting, reporting and follow up of mitigating controls to bring it in line with current Internal Audit standards and risk management. If there was sufficient resources, further FRAs and revisit previous assessments will be undertaken.

Work continues with Governance and Law to embed a requirement for a fraud risk assessment on all key decisions. ICT Risk and Compliance Team have enhanced their process to signpost management to Counter Fraud to complete fraud risk assessment on any new initiatives involving new IT systems.

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Irregularity Referrals - April 2024 to September 2024 Overview

266 irregularity referrals were received from April 2024 to September 2024. This is an increase of 40 referrals (17%) against the same period on previous years referrals (226). An increase in referrals is a good indication of awareness of the need to report irregularities to Internal Audit and Counter Fraud to assess where an investigation is required, ensure risks are assessed and mitigated, identifying lessons to be learnt and financial recovery occurs.

As shown in the subsequent slides and Appendix A, there has been increases in irregularities relating to:

- Procurement – Invoice of services not delivered/ overpayments due to data inputting errors;
- No Recourse to Public Funds (NRPF) – Increase in the number of people claiming support due to destitution and not being able to access public funds;
- Blue Badge misuse – Use of stolen and deceased badges in particular;

Distribution and characteristics of irregularities reported are shown in [Appendix A](#)

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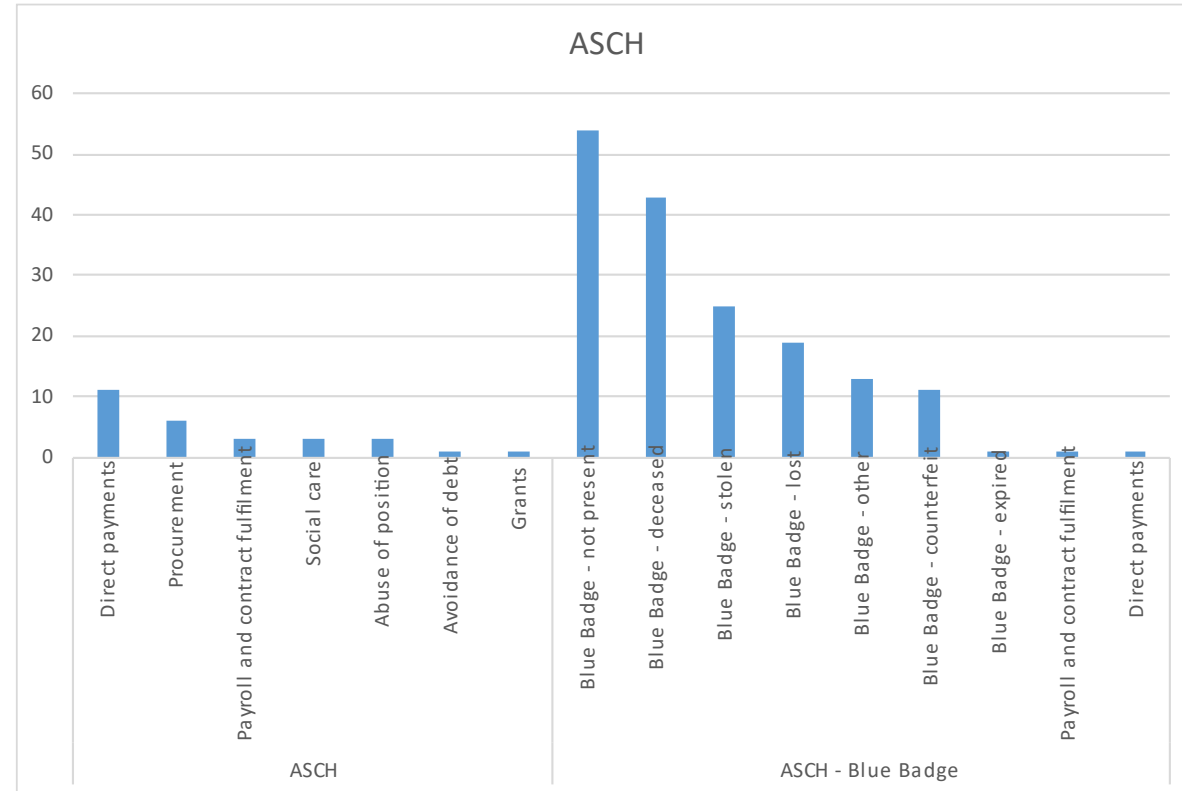
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Irregularity Referrals by Directorate and Fraud Type – Adult Social Care and Health

There has been 30 financial irregularities (excluding blue badges) reported to Internal Audit and Counter Fraud between April 24 and September 24.

Procurement

- Payments totalling £75,739 paid to provider after the person had passed away;
- Five referrals have been received relating to provider invoicing which are currently under review.



Irregularity Referrals by Directorate and Fraud Type – Adult Social Care and Health - Continued

Blue badges:

There has been 158 referrals relating to blue badges received from April 2024 to September 2024, which is comparable to the same level of referrals received in the same period for 2023/ 2024. The outcomes of these referrals are:

- 122 Penalty Charge Notices being issued across Kent resulting in an estimated £3,660 of additional parking revenue.
- 50 Warning Letters to reminder users of the appropriate use
- 1 Pending prosecution
- 44 badges removed from being misused

Direct Payments:

There has been 12 irregularities relating to direct payment misuse referred this year, current actual loss of £1,249, there are five cases under investigation so this figure may increase.

There is a potential loss of £19,000 due to non-payment of client contribution and their Kent card account being frozen.

Salary Overpayments:

There has been 4 irregularities reported due to salary payments continuing after the person had left KCC, this resulted in actual losses of £6,412.

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Irregularity Referrals by Directorate and Fraud Type – Children Young People and Education

No Recourse to Public Funds:

The Counter Fraud Team provide a due diligence check to validate someone’s circumstances when applying for funding under the Childrens Act.

There have been 16 referrals for destitution checks from April to September 2024.

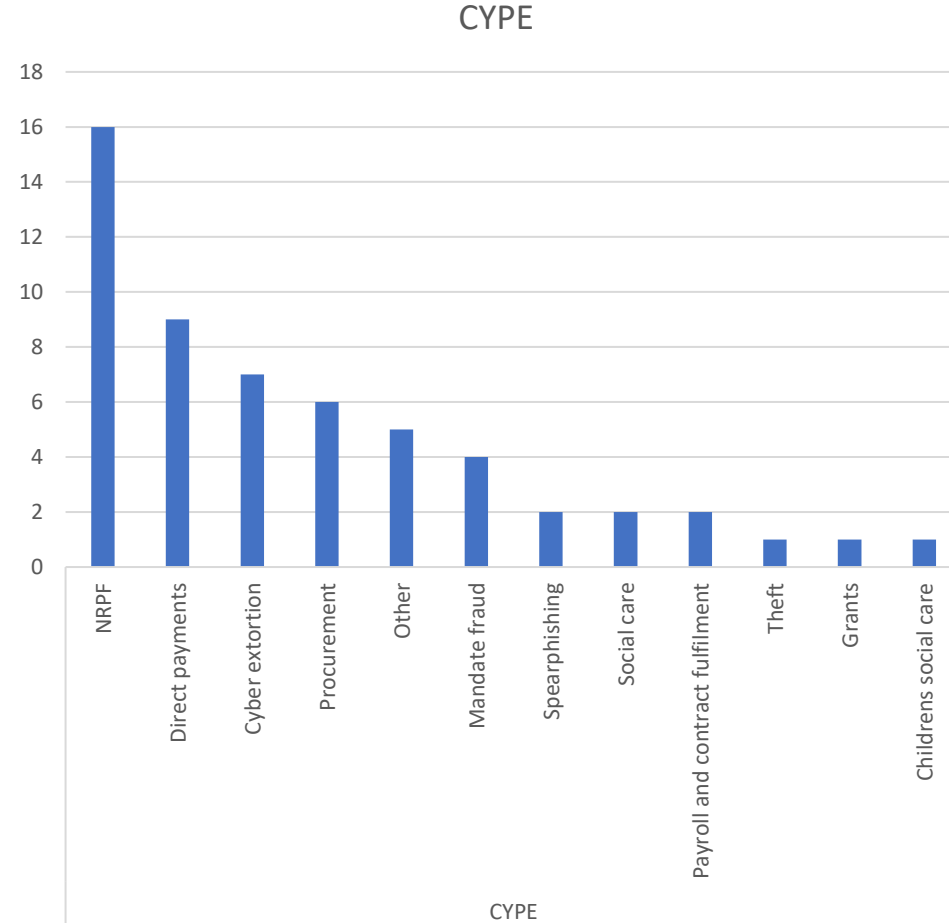
Through these checks, positive assurance can be provided to CYPE that the person is destitute and public funds are being used to support KCC statutory duties.

Direct Payments:

There have been 9 referrals relating to irregularities in Direct Payments, four cases closed this year relating to referrals received in previous years. Actual loss calculated to date amounts to £26k, all amounts are subject to full recovery action.

Cyber Fraud/Spear Phishing

Schools continue to be targeted, with 9 referrals relating to requests to make payments. No actual losses have occurred, there is a prevented loss of £35,790 due to the good awareness of these frauds within the reporting schools.



Irregularity Referrals by Directorate and Fraud Type – Children Young People and Education - Continued

Procurement

There has been three procurement fraud referrals relating to invoicing for services not being delivered. These are currently under investigation and there has been a **prevented loss of £160k due** to checks completed by Counter Fraud identifying irregularities prior to the invoice being paid. Further work is ongoing on the two other referrals.

Salary Over/ Under payments:

There has been one reported salary overpayment, with an actual loss of £6,509, which is subject to full recovery.

A salary underpayment has been identified where an employee within CYPE had not received a pay increase for a number of years, which resulted in them receiving a salary below their grade. Engagement with KCC Payroll provider identified they do run an exception report to identify any staff who has not received an increase, with this person included in that report, however could not provide a reason why this was not investigated and appropriate action taken, this resulted in a £8,176 underpayment to the individual. Payroll have advised there are no other cases that have not been resolved.

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Irregularity Referrals by Directorate and Fraud Type – Growth, Environment and Transport

Concessionary fares:

Two referrals relating to misuse of people's concessionary bus pass have been reported. The actual loss is difficult to calculate, however the Department for Transport places a potential loss of £113 where fares are misused through the avoidance of paying bus fares.

Procurement

Two cases of invoicing for services not being delivered have been reported by the transport team and are currently under investigation.

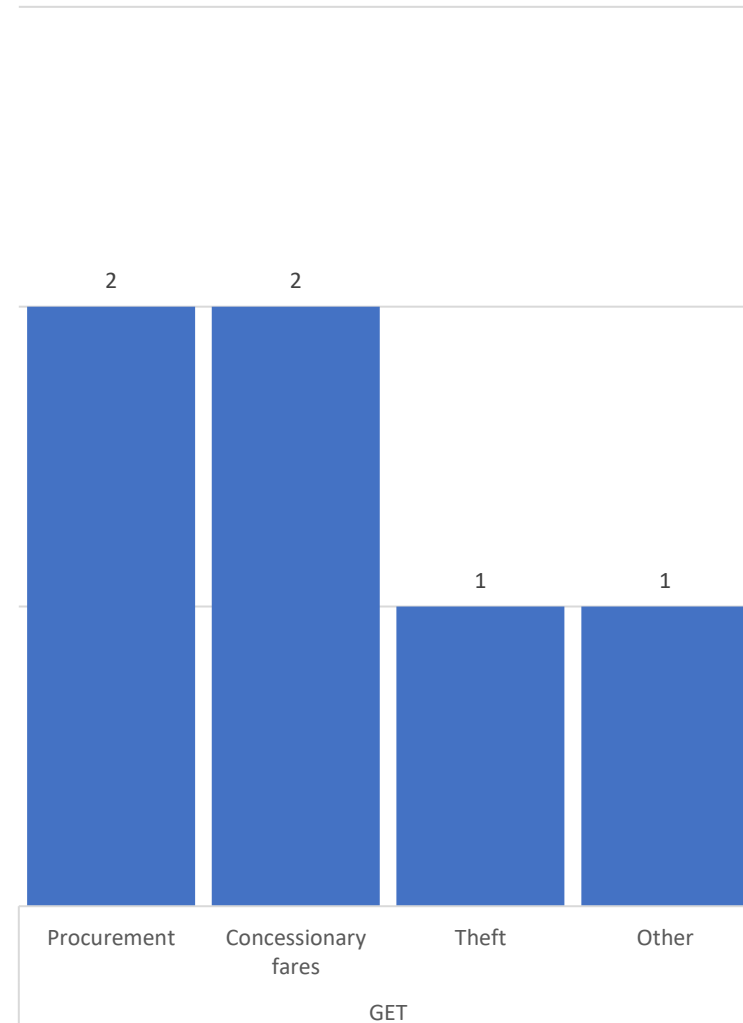
Blue Badges:

Although the Blue Badge scheme is administered by ASCH, the majority of misuse occurs within on-street parking bays, thus having an impact on the amount District/Borough Councils receive from this income and in turn the amount they could potentially return to KCC.

Theft:

Libraries and Registration have reported a minor irregularity relating to the theft of £15 from one of their libraries, advise and support has been provided on appropriate controls on safe cash storage and reporting to the police.

Growth, Environmental and Transport



GET

Irregularity Referrals by Directorate and Fraud Type – Chief Executive/ Deputy Chief Executive Departments

Grants:

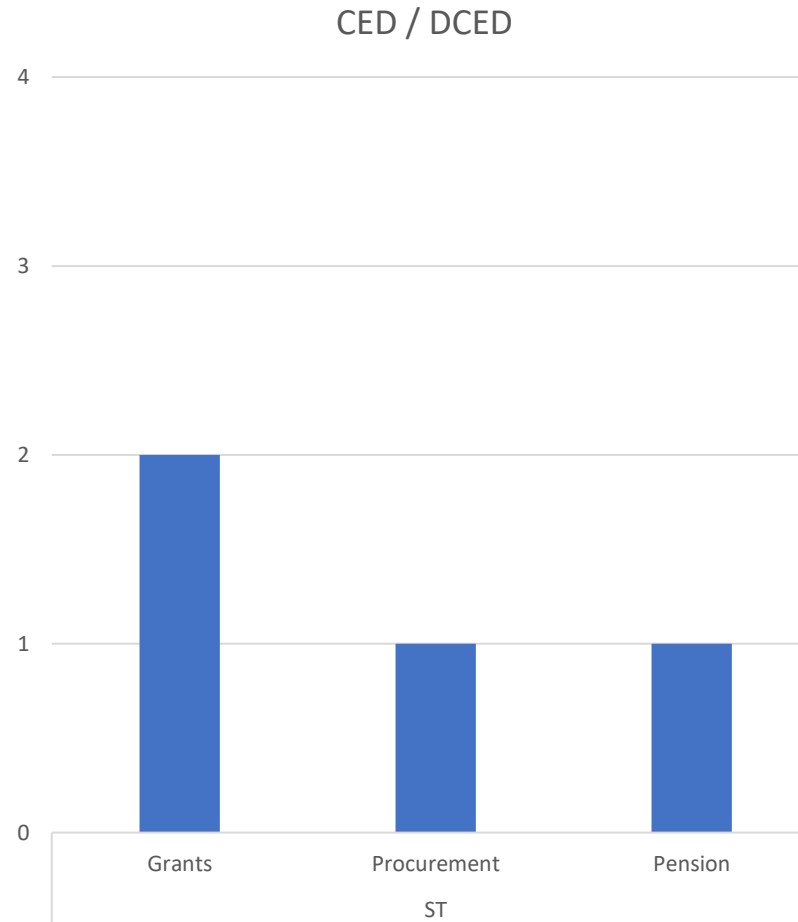
Two referrals have been received in respect to grants, the first within the Household Support Fund which provides support to help with the cost of living, via food and energy vouchers.

It has been identified that a number of forged documents were used to evidence that they were in arrears with their energy supplier. The e-vouchers can be cashed at any paypoint in the country, analysis has not identified a common theme to identify a suspect in this matter, an action fraud referral has been made. This resulted in a loss of £12,100 and a prevented loss of £23,400 following management completing further due diligence checks and suspending applications where forged documents were identified.

The second referral relates to the Home for Ukraine scheme where it has been identified host payments should have ceased. This was identified following checks with the DWP which identified entitlement to Housing Benefit by the guest. This then precludes the host from receiving payments from KCC. This has resulted in a loss of £18k with full reclaim via invoice being progressed.

Pensions

An irregularity resulting in £9,259 being paid into a wrong account, civil recovery is being progressed.



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Kent Intelligence Network (KIN) Overview – Outturn for 2023-2024

The KIN continues to provide valuable financial support to KCC, Police, Fire Authority and District Councils and the outcomes for the period 1 April 2023 to 31 March 2024, set out below, show the results and financial returns achieved.

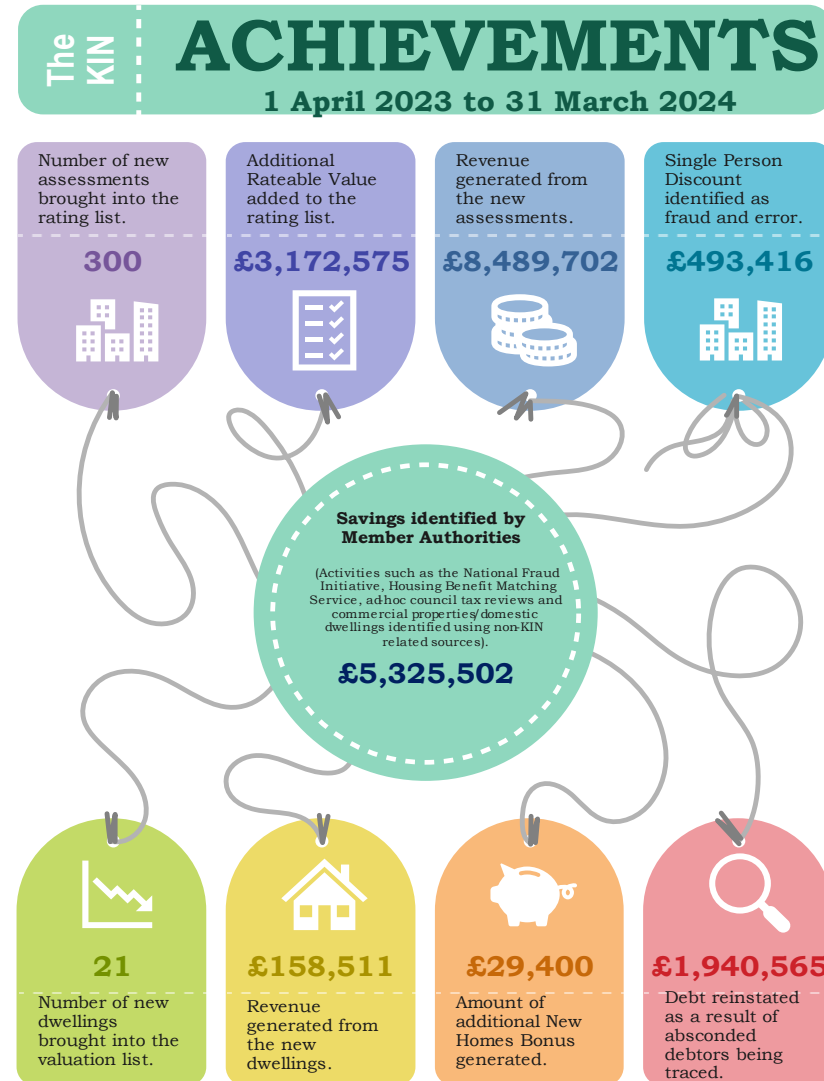
Business Rates

300 commercial properties, amassing a combined rateable value of £3,172,575, have been identified that were previously missing from the rating list. These properties have now been brought into the list by the Valuation Office Agency and consequently, the businesses occupying these properties are now liable for business rates.

The additional business rates revenue generated from the identification of these missing properties is £8,154,907 (£8,489,702 including Medway), of which broadly 9% (£733,941) comes to KCC, once collected, is a combination of the following:

- The total amount of business rates billed for both the current financial year and previous financial years of £4,009,599 (£4,102,035 including Medway); and
- A 'future loss prevention' provision of 3 years of £4,145,308 (£4,387,667 including Medway). This represents the amount of additional income that would have been lost if the respective properties had not been identified by the KIN.

It is also pertinent to highlight that on 31 March, there were 86 cases with the Valuation Agency awaiting assessment/valuation, none of which are included in the figures stated above, and a further 152 cases which are currently under investigation by billing authorities.



Kent Intelligence Network (KIN) Overview – Outturn 2023-24 Continued

Council Tax

The KIN also helped to identify dwellings missing from the valuation list and an additional 21 dwellings have been identified in this financial year.

The additional council tax revenue generated from the identification of these missing properties is £143,075 (£158,511 including Medway), of which broadly 73% (£104,444) comes to KCC, once collected, is a combination of the following:

- The total amount of council tax billed for both the current financial year and previous financial years is £43,921 (£47,140 including Medway); and
- A ‘future loss prevention’ provision of 3 years of £99,154 (£111,371 including Medway). This represents the amount of additional income that would have been lost if the respective dwellings had not been identified by the KIN.

It is also pertinent to highlight that on 31 March, there were 11 cases with the Valuation Agency awaiting assessment/valuation, none of which are included in the figures stated above, and a further 22 cases which are currently under investigation by billing authorities.

Dwellings added to the valuation list also help to generate additional New Homes Bonus (NHB) for both Districts and KCC. It is estimated that the 21 dwellings identified will generate £29,400, of which 20% (£5,880) comes to KCC.

In respect of the £1,940,565 that has been traced from absconded council tax debtors, this will generate additional income for KCC, depending on the amount that is collected. Even if a bad debt provision of 30% is applied to the amount of debt brought back into recovery, KCC would broadly receive 73% of £1,358,395, once collected, and this would amount to £991,628.

Finally, the proactive work being done in respect of identifying erroneous claims for Council Tax Single Person Discounts has resulted in the additional billing of Council Tax amounting to £493,416, of which broadly 73% (£360,193) comes to KCC, once collected.

In total, the financial benefit to KCC from the initiatives and successes detailed above amounts to £2,196,086.

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Kent Intelligence Network (KIN) Overview – Outturn 2023-24 Continued

It is also important to highlight the investment made by KCC to help billing authorities achieve these outcomes. This investment is by way of an annual grant given to the respective billing authorities, the components for which are broken down as follows:

- A grant of £352,646 for the provision of additional resources to help carry out KIN related work, and also to assist with non-KIN related initiatives that help to increase the tax base and rates base.
- A grant of £19,710 towards a product that helps to trace absconded council tax debtors.

Solely in respect of the KIN related work, the financial return for 2023/24 is £1,823,730 (this figure is derived from the total financial benefit to KCC, less the grants given to billing authorities to help achieve the outcomes detailed above). This is equivalent in ratio to a 6:1 return-on-investment (total financial benefit / total grants).

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Kent Intelligence Network (KIN) Overview Continued

Finally, the proactive work being undertaken in respect of identifying erroneous claims for Council Tax Single Person Discounts has resulted in the additional billing of Council Tax amounting to £388,567, of which broadly 73% (£283,653) comes to KCC, once collected.

In total, the financial benefit to KCC from the initiatives and successes detailed above amounts to **£1,820,964**.

It is also important to highlight the investment made by KCC to help billing authorities achieve these outcomes. This investment is by way of an annual grant given to the respective billing authorities, the components for which are broken down as follows:

- A grant of £352,646 for the provision of additional resources to help carry out KIN related work, and also to assist with non-KIN related initiatives that help to increase the tax base and rates base.
- A grant of £19,710 towards a product that helps to trace absconded council tax debtors.

Solely in respect of the KIN related work, the return-on-investment to date (April to December) is £1,448,608 (this figure is derived from the total financial benefit to KCC, less the grants given to billing authorities to help achieve the outcomes detailed above).

Finally, the proactive work being done in respect of identifying erroneous claims for Council Tax Single Person Discounts has resulted in the additional billing of Council Tax amounting to £388,567, of which broadly 73% (**£283,653**) comes to KCC, once collected.

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Kent Intelligence Network (KIN) Overview Continued

Kent Intelligence Network (KIN)

The KIN continues to provide valuable financial support to KCC, Police, Fire Authority and District Councils and the outcomes for the period 1 April 2024 to 30 June 2024, set out below, show the results and financial returns achieved.

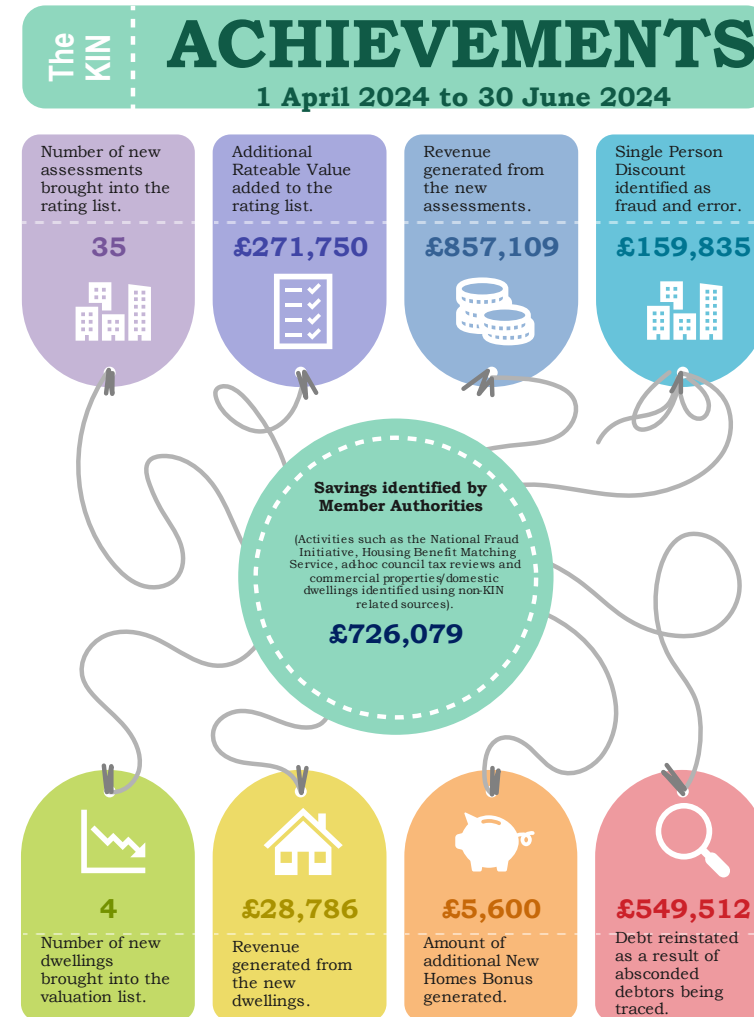
Business Rates:

35 commercial properties, amassing a combined rateable value of £271,750, have been identified that were previously missing from the rating list. These properties have now been brought into the list by the Valuation Office Agency and consequently, the businesses occupying these properties are now liable for business rates.

The additional business rates revenue generated from the identification of these missing properties is £857,109, of which broadly 9% (£77,139) comes to KCC, once collected, is a combination of the following:

- The total amount of business rates billed for both the current financial year and previous financial years of £475,205; and
- A 'future loss prevention' provision of 3 years of £381,904. This represents the amount of additional income that would have been lost if the respective properties had not been identified by the KIN.

It is also pertinent to highlight that on 30 June, there were 94 cases with the Valuation Agency awaiting assessment/valuation, none of which are included in the figures stated above, and a further 124 cases which are currently under investigation by billing authorities.



Kent Intelligence Network (KIN) Overview Continued

Council Tax:

The KIN also helped to identify dwellings missing from the valuation list and an additional 4 dwellings have been identified in this financial year.

The additional council tax revenue generated from the identification of these missing properties is £28,786, of which broadly 73% (£21,013) comes to KCC, once collected, is a combination of the following:

- The total amount of council tax billed for both the current financial year and previous financial years is £7,998; and
- A 'future loss prevention' provision of 3 years of £20,788. This represents the amount of additional income that would have been lost if the respective dwellings had not been identified by the KIN.

It is also pertinent to highlight that on 30 June, there were 7 cases with the Valuation Agency awaiting assessment/valuation, none of which are included in the figures stated above, and a further 22 cases which are currently under investigation by billing authorities.

Dwellings added to the valuation list also help to generate additional New Homes Bonus (NHB) for both Districts and KCC. It is estimated that the 4 dwellings identified will generate £5,600, of which 20% (£1,120) comes to KCC.

In respect of the £549,512 that has been traced from absconded council tax debtors, this will generate additional income for KCC, depending on the amount that is collected. Even if a bad debt provision of 30% is applied to the amount of debt brought back into recovery, KCC would broadly receive 73% of £384,658, once collected, and this would amount to £280,800.

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Kent Intelligence Network (KIN) Overview Continued

Finally, the proactive work being done in respect of identifying erroneous claims for Council Tax Single Person Discounts has resulted in the additional billing of Council Tax amounting to £159,835, of which broadly 73% (£116,679) comes to KCC, once collected.

In total, the financial benefit to KCC from the initiatives and successes detailed above amounts to £496,751.

It is also important to highlight the investment made by KCC to help billing authorities achieve these outcomes. This investment is by way of an annual grant given to the respective billing authorities, the components for which are broken down as follows:

- A grant of £352,646 for the provision of additional resources to help carry out KIN related work, and also to assist with non-KIN related initiatives that help to increase the tax base and rates base.
- A grant of £19,710 towards a product that helps to trace absconded council tax debtors.

Solely in respect of the KIN related work, the financial return to KCC so far for 2024/25 is £124,395 (this figure is derived from the total financial benefit to KCC, less the grants given to billing authorities to help achieve the outcomes detailed above).

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Counter Fraud Action Plan 2024/2025

Updates to the 2024/25 Counter Fraud Action Plan are set out in Appendix B.

The balance between pro-active and re-active work continues to be a challenge within resource levels. Resource levels below include staff working within the shared service with Tonbridge and Malling Council (0.2 FTE Counter Fraud Manager, 1 FTE Counter Fraud Technician & 0.8 FTE Intelligence Officer).

The Action Plan for 2023/ 24 has been delivered with an increase of awareness being seen through more irregularities being reported, this helps inform areas of risk and where needed inform audits in these areas.

Counter Fraud Resources

Position	Current number of employees
Counter Fraud Manager	1
Counter Fraud Specialists	3
Counter Fraud Technician	2
Intelligence Officer	0.8
Intelligence Assistant	1

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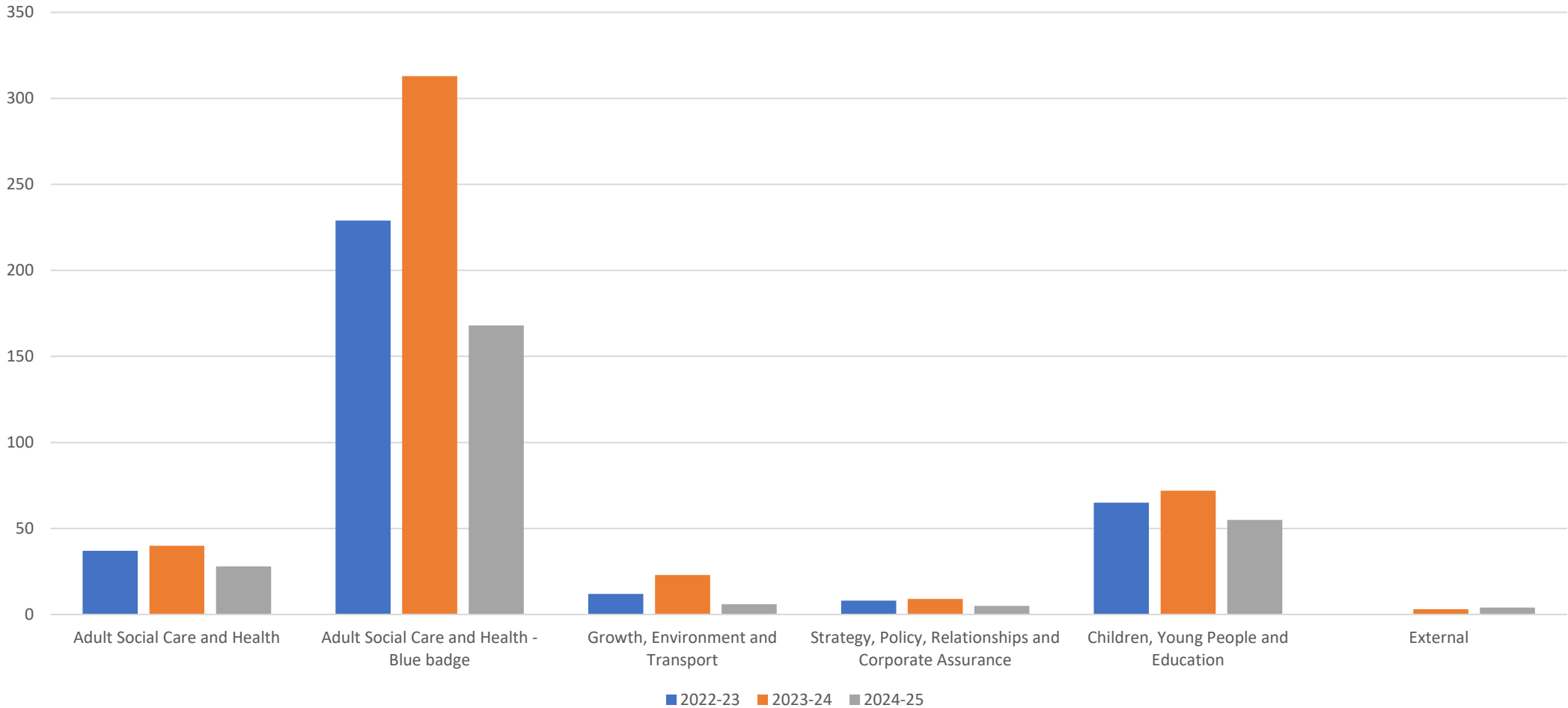
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Appendix A - Year on Year Comparison – by Directorate

While Blue Badge cases still represent the largest number of referrals the Counter Fraud service receives, there has been increases of referrals in relation to procurement. ASCH and CYPE represent the highest proportion of our caseload.



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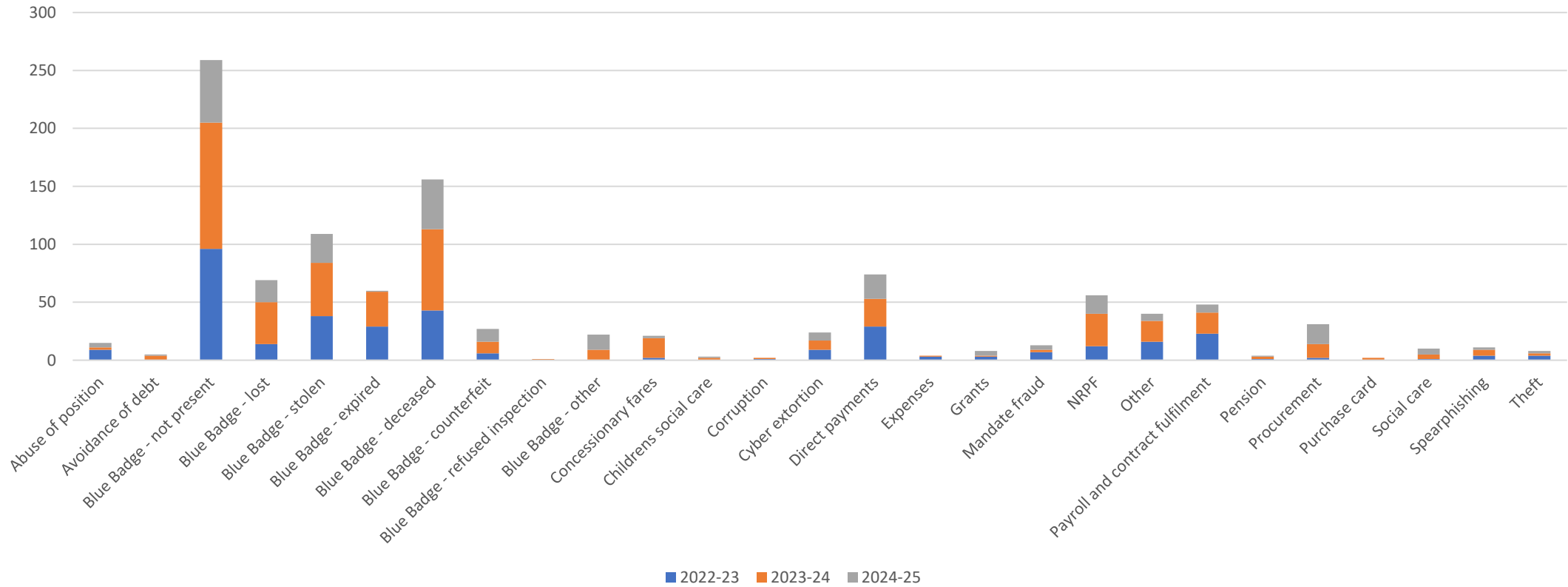
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Appendix A - Year on Year Comparison – by Fraud Type

This slide demonstrates that Direct Payments have historically been the biggest risk of fraud after blue badges. This year however, the number of procurement related and NRPF referrals received has a greater financial risk to KCC.



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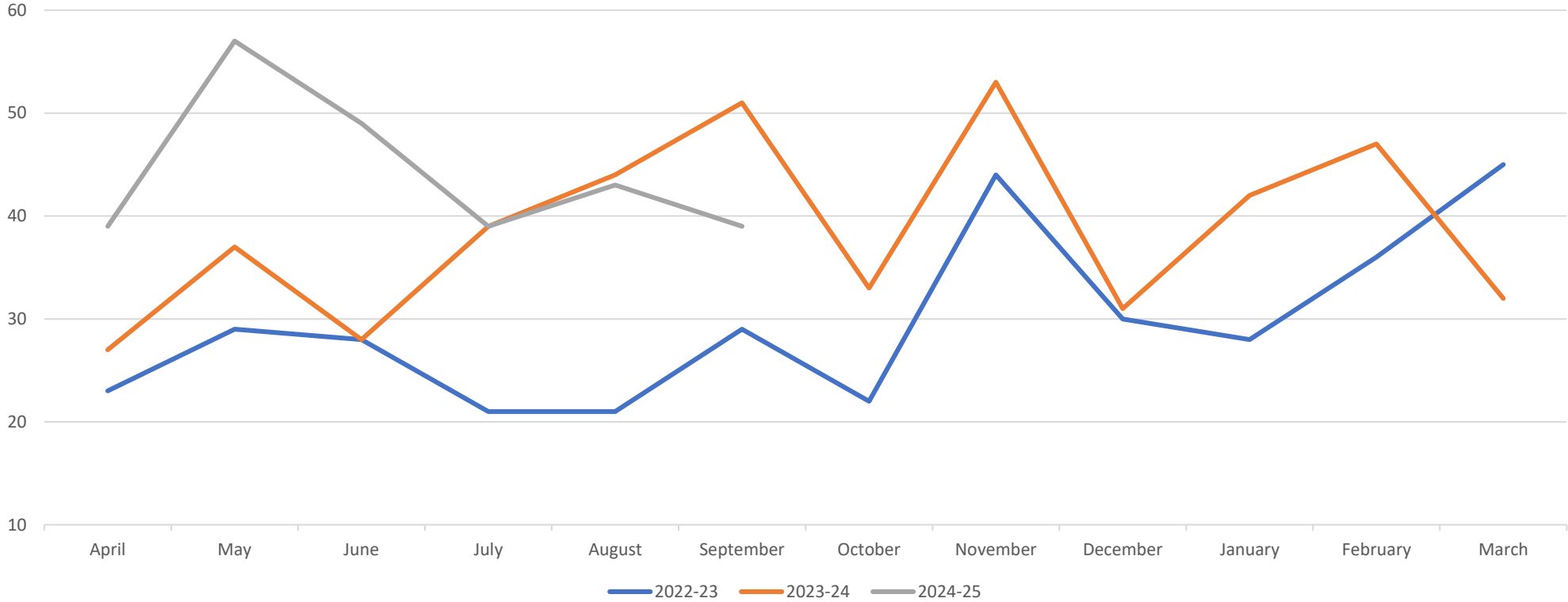
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Appendix A - Year on year comparison – by Month Received

Referrals from April to September 2024 are averaging over 40 per month.



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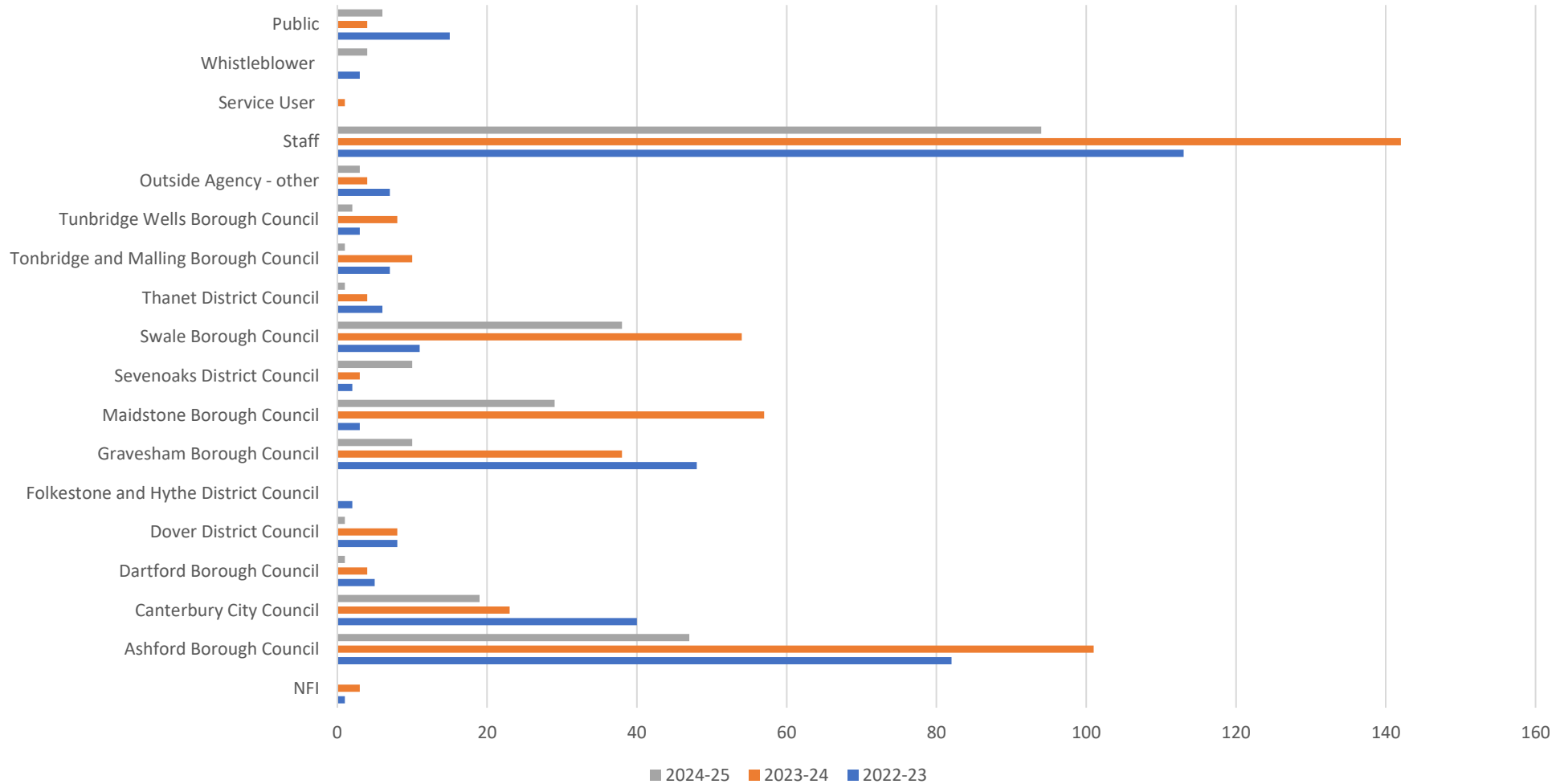
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Appendix A - Year on Year Comparison – by Source of Referral

Relationship management/ awareness is working as in most cases, the number of referrals received from KCC staff, Districts and Boroughs is increasing.



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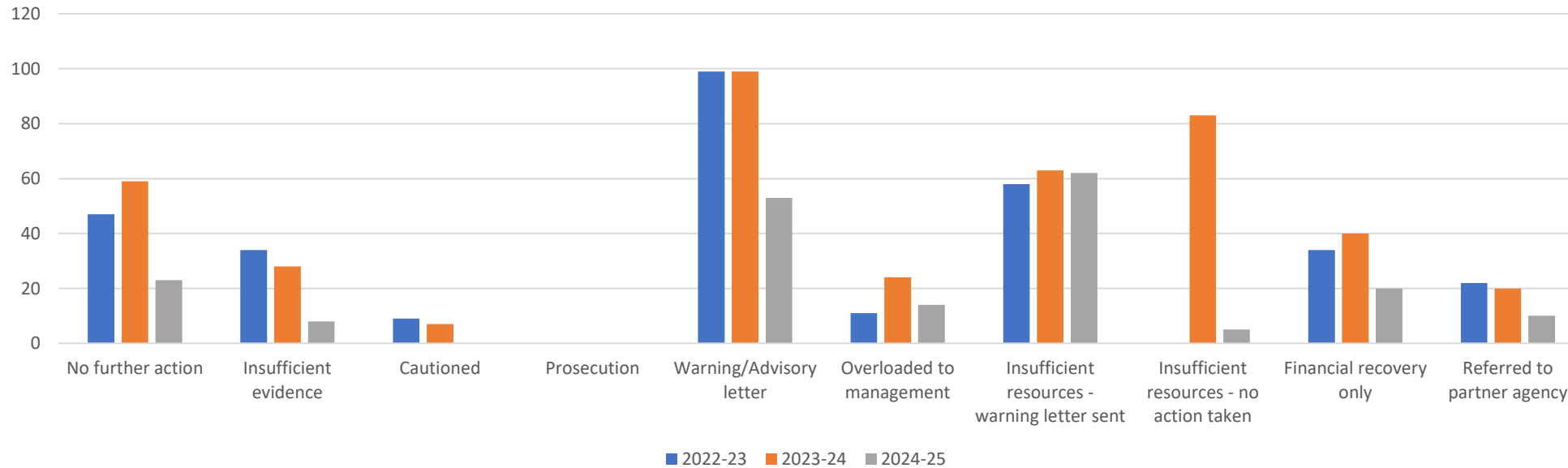
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Appendix A - Year on year comparison – by outcome

The increase in the number of referrals, in particular blue badge referrals, has resulted in some referrals not being progressed due to work on more complex cases taking priority.



Blue Badge Referrals – By type and Referring Parking Team

Ashford Borough Council continue to detect more blue badge misuse than other District/ Borough Councils, however we have seen a marked increase of referrals being received from Canterbury, Maidstone and Swale councils.

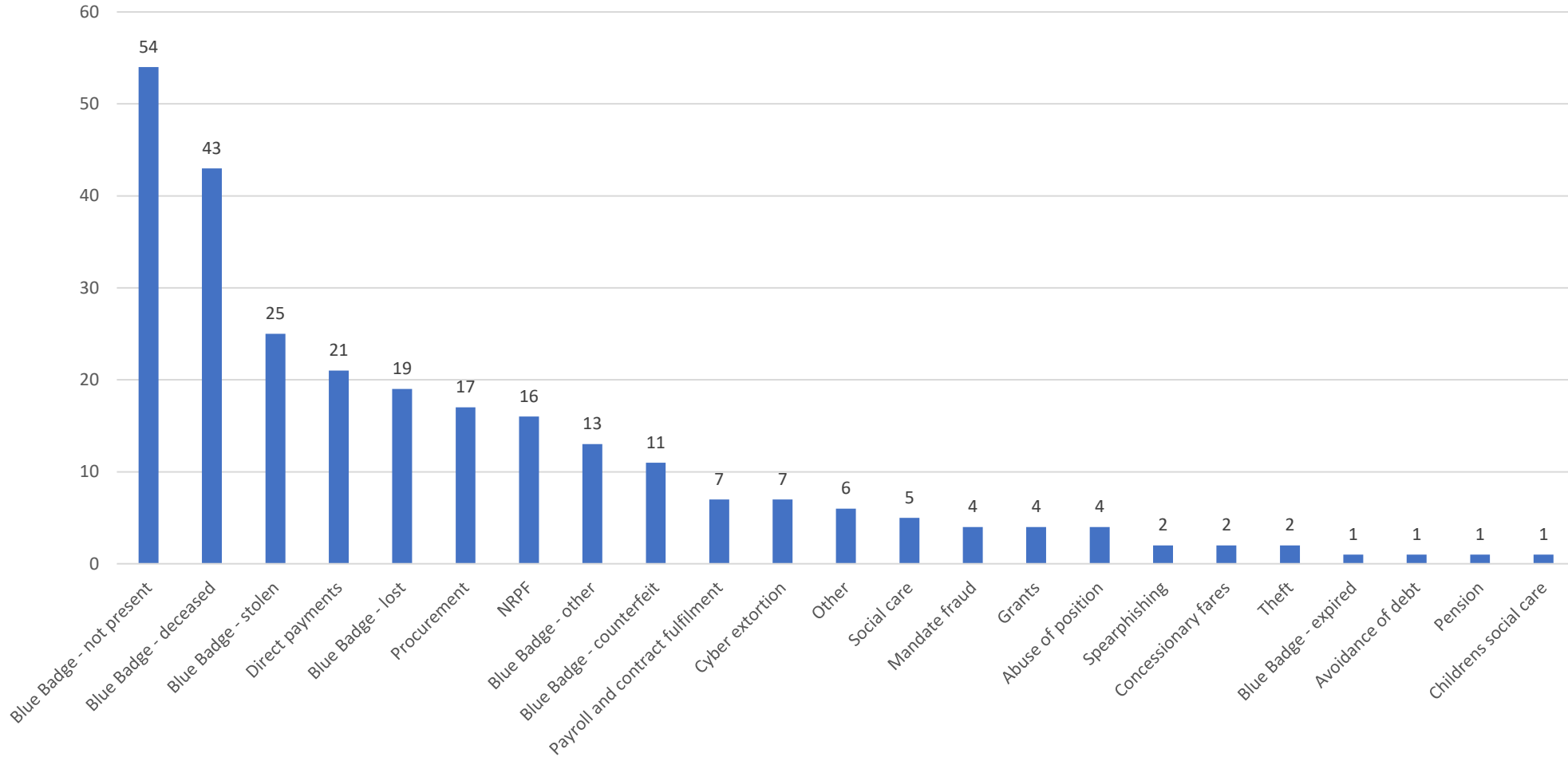
The Counter Fraud Team are also receiving more referrals relating to counterfeit badges being used, these include KCC issued badges as well as counterfeit badges from other issuing authorities.

Blue Badge misuse type	Number of referral
Blue Badge – counterfeit	11
Blue Badge - deceased	43
Blue Badge - expired	1
Blue Badge - lost	19
Blue Badge - not present	54
Blue Badge - other	13
Blue Badge - stolen	25
Grand Total	166

Parkign Enforcemnt area	Number of referrals
Ashford Borough Council	47
Canterbury City Council	19
Dartford Borough Council	1
Dover District Council	1
Gravesham Borough Council	10
Maidstone Borough Council	29
Sevenoaks District Council	10
Swale Borough Council	37
Thanet District Council	1
Tonbridge and Malling Borough Council	1
Tunbridge Wells Borough Council	2
Total	158

Appendix A: Fraud and Irregularity Referrals April 2024 to September 2024

Referrals by Fraud Type



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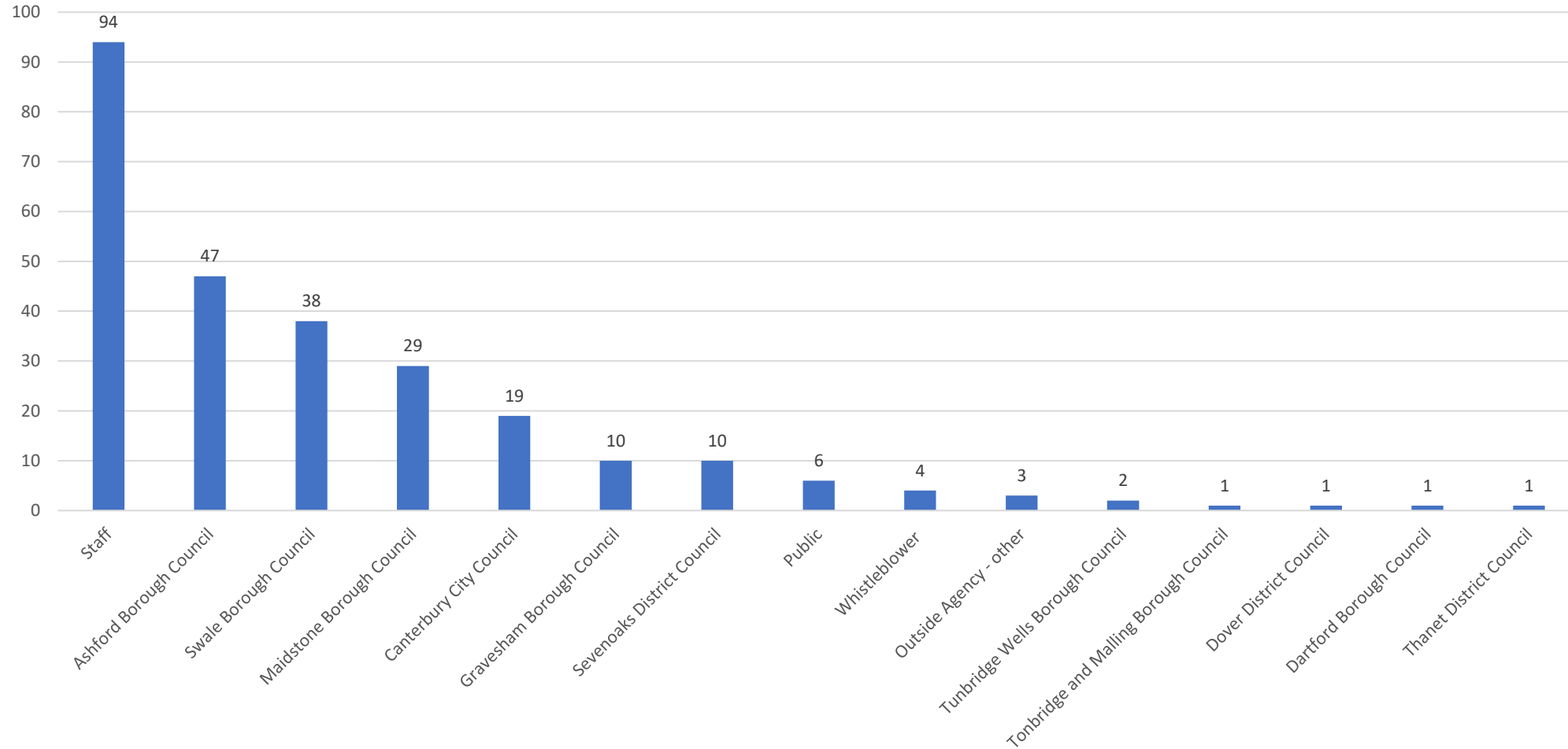
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Referrals by Source



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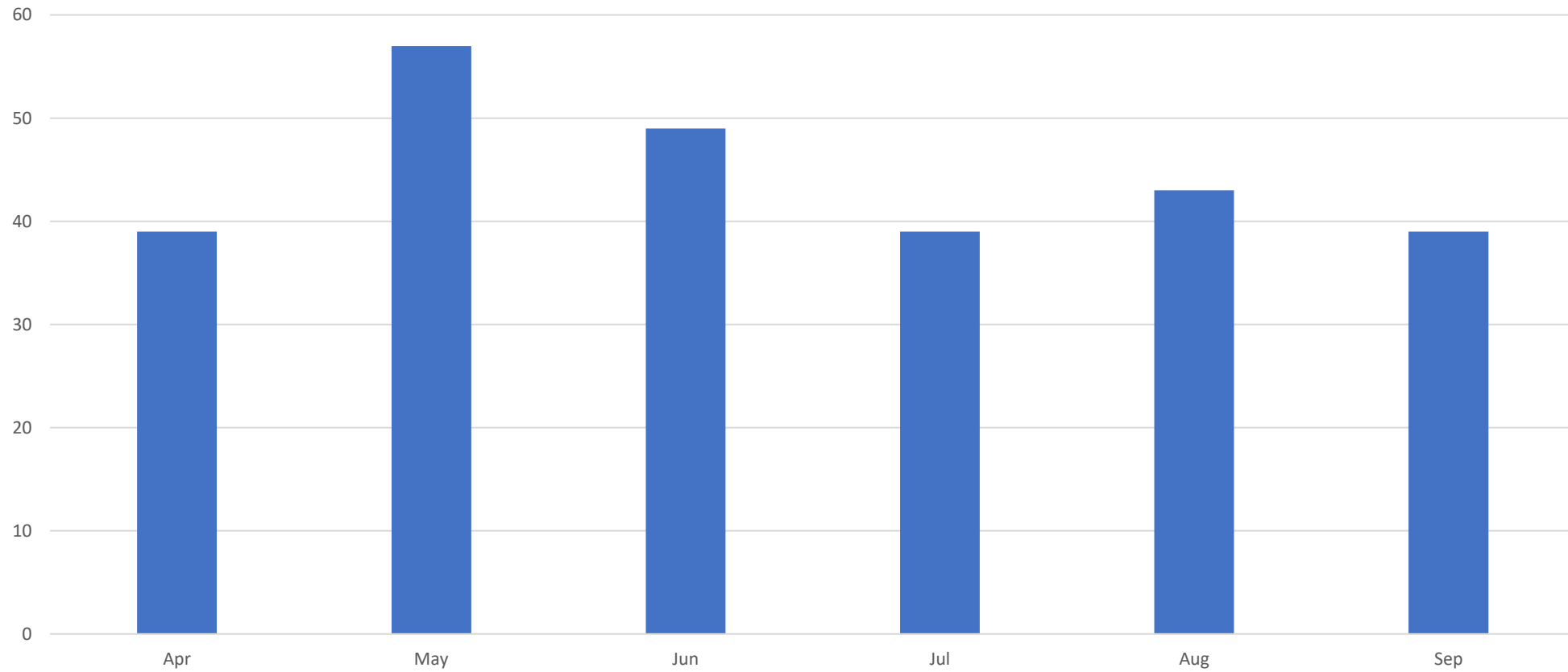
[Kent Intelligence Network](#)

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Referrals by Month



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Appendix B: Fraud Action Plan 2024/25

Pillar	Activity	Detail	Update
Govern - Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation.	Counter Fraud Update, Audit Committee	A quarterly Counter Fraud update will be provided to Corporate Management Team and the Audit Committee to demonstrate the activities undertaken by the Counter Fraud Team against the plan to prevent and detect Fraud, Bribery and Corruption.	<p>In progress – Progress report for 2024/25 being reported to CMT and November G&A.</p> <p>In addition, fraud and error awareness presentation to Cabinet completed.</p>
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.	In progress – Completed in January 2024, next review to be completed in January 2025.
	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). To work with Governance and Law to embed fraud risk assessments within the Key Decision process.	<p>In Progress – see proactive slide. One fraud risks assessment in fieldwork following the identification of fraud.</p> <p>Engagement with Governance and Law to include the need for fraud risk assessment in key decision process.</p>
	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.	In progress – Meetings held with senior officers. Attendance at the task and finish group for supporting living to challenge and support management.
	Whistleblowing Hotline and log	The Counter Fraud Team manage the Councils Central Whistleblowing Log and the Whistleblowing helpline.	In progress

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Appendix B: Fraud Action Plan 2024/25

Pillar	Activity	Detail	Update
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 to ensure that sessions delivered to officers on a risk- based approach. 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.	In progress see proactive slides for update.
	Internal Audit	The Counter Fraud Team will review draft engagement plans to ensure any issues identified through investigations or relationship management meetings help inform the scope of any audits.	In progress – Draft engagement plans review by CFM and/ or ACFS to provide advice to IA.
	International Fraud Awareness Week Campaign	To deliver an internal campaign to officers during International Fraud Awareness week.	In progress – Communication plan in place with internal communications supporting the delivery of key messages.
	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 through the project to ensure matches are cleared.	In progress – Data specification and project timetable shared with services, data received and uploaded to the NFI. Expecting output from data match mid-December. Engagement with services next step to inform approach to investigate and clear matches.
	Kent Intelligence Network	The Counter Fraud Team will support the Kent Intelligence Network on activities that benefit KCC and the wider Kent Residents/.	In progress – See update on KIN

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Appendix B: Fraud Action Plan 2024/25

Pillar	Activity	Detail	Update
Pursue Prioritising fraud recovery and use of civil sanctions. Developing capability and capacity to punish offenders. Collaborating across geographical and sectoral boundaries. Learning lessons and closing the gaps	Investigations	<p>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;</p> <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. 	In progress – outcomes and referral rates reported in main report.
	Partnership Working	To maintain and develop working with key partner agencies in the prevention and detection of fraud such as the Kent Intelligence Network, Local Authorities, Kent Police as well as internal teams within KCC.	In progress – SE County Council Fraud Hub engagement, London Fraud Investigation Group engagement, Kent Fraud Panel engagement.

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