

# Counter Fraud Service Report November 2025

## Audit and Governance Committee

### Plymouth City Council

November 2025

Official



**Tony Rose**  
Head of Devon Assurance Partnership



## 1. Executive Summary

- 1.1 The following is the [Devon Assurance Partnership](#) (DAP) [Counter Fraud Services Team](#) Half Yearly Report and Update for November 2025. It outlines the counter fraud work undertaken in support of Plymouth City Council and its continued efforts to ensure that appropriate governance processes are in place. This includes acknowledging the threats posed by fraud, preventing and pursuing those who would look to commit fraud and providing assurance that the Council and the public are being protected from fraud.
- 1.2 Plymouth continues to lead the South West in utilising its own data to prevent and detect fraud and error. This is being undertaken to good effect, and we will look to support and improve this approach across other areas of Council business. This will further improve the added value that DAP provides and increase an integrated assurance opinion that supports the Council and Local people.

## 2. Introduction

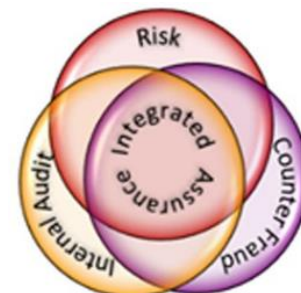
- 2.1 The Counter Fraud Services Team within Devon Assurance Partnership (DAP) continues to support and facilitate the development of the Council's Counter Fraud processes and capability to improve its resilience to fraud and related offences.
- 2.2 The ongoing work will assist all Council staff, management, and members in identifying fraud and the risks associated with it. The aim is to provide the highest level of assurance utilising a joined-up service in association with our colleagues involved in Audit, Risk Management, and the Council itself to minimise fraud loss to the lowest level possible.
- 2.3 Reporting Counter Fraud activity is part of good Governance, and regular updates on the Council's Counter Fraud activity improves accountability; this report aims to meet this requirement and the requirements for such reports in accordance with the Council's own Anti-Fraud, Bribery and Corruption Policy and the accompanying Strategy and Response Plan.
- 2.4 It is always worth reiterating that fraud is a crime and should not be tolerated. Any fraud against the Council is a fraud against the public purse. We will continue to acknowledge the threat from fraud, build processes and policies that will prevent fraud and pursue those who would commit fraud to ensure that the public retain confidence in the Council. Collaboration across the public sector will continue and strengthen under the current working arrangements through DAP and its partners.

## 3 Fraud Response / Resilience Assessment.

- 3.1 A Local Authority is self-regulating in respect of counter fraud. It should aim to show that it undertakes realistic self-assessment and has identified and understands the major risks. It should acknowledge the problems and put in place plans which can demonstrate that it is acting with visible outcomes. It should aim to create a transparent process and report the results to the corporate management team and those charged with governance.
- 3.2 DAP will continue to encourage best practice in line with CIPFA and other related guidance and enables the Council to share knowledge and understanding of the threats faced across the region and nationally by actively engaging with the West of England Fraud Group.

## 4 Integration of Counter Fraud, Risk Management, and Internal Audit.

- 4.1 The integration between these assurance arms continues to evolve and strengthen. Regular meetings between the relevant managers and staff ensure that cross collaboration is growing and improving so that Assurance Officers are aware of fraud and risk issues (See Appendix 1).
- 4.2 Regular communication between Devon Assurance Partnership and the Service Director for Finance (Section 151 Officer) ensures that direction, clarity and flexibility take place and continue to improve.
- 4.3 We are looking to assist and support PCC in its effective overall Risk Management processes to ensure that we can provide maximum assurance going forward. This remains an ongoing objective.



## 5 National Fraud Initiative

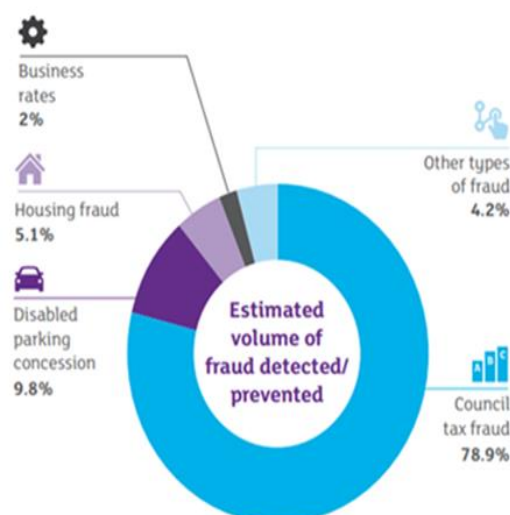
- 5.1 The [National Fraud Initiative](#) (NFI) is an exercise run and reported on by the [Cabinet Office](#); it matches electronic data within and between public and private sector bodies to prevent and detect fraud and error.



- 5.2 Devon Assurance Partnership acts as the point of contact between the Cabinet Office and the Council in matters relating to the National Fraud Initiative, this being a mandatory Biannual exercise in fraud prevention and detection.

- 5.3 The NFI has been run, and matches are being investigated at the moment, results from this will be fed back in the end of year report.

- 5.4 Dual Employment / Career Polygamy – There has been a national rise in the awareness of, and investigation into, people holding two different jobs in two different entities – working for both at the same time and not notifying either entity.



- 5.5 The NFI provides a point in time data match for public sector organisations and so allows for Career Polygamy in the public sector to be identified. This has increased due to post pandemic working practices and details of any outcomes linked to Plymouth will be reported back to the committee if identified.
- 5.6 Departments that complete the returned matches show that they are actively involved reducing fraud risk as well making sure that wherever possible their data management is compliant with the Data Protection Act 2018 by ensuring; **Data minimisation** by ensuring that PCC only holds data that is required; **Accuracy** by ensuring that the data held is as accurate as it can reasonably be expected to be; and **Data retention periods**, showing that data is not being held longer than is necessary for its intended use.
- 5.7 New Data Set - Adult Social Care Data. Residential Care Homes and Personal Budget data is now requested following a change in legislation in September 2025. This data needs to be submitted between 20th October 2025 and 14<sup>th</sup> November 2025. We are working with relevant officers and expect no issue in meeting these deadlines.

## 6 Investigations and other ongoing work

6.1 So far, this financial year, the Counter Fraud Services (CFS) Team have received and or generated 166 referrals covering the following areas of Council Business.

- ✓ Tenancy Fraud (involving our partner Registered Social Landlords)
- ✓ Blue Badge Fraud
- ✓ Parking Permits
- ✓ Concessionary Travel
- ✓ Council Tax Support / Single Person Discount
- ✓ Business Rates
- ✓ Internal

6.2 The CFS team have 47 live investigations (*details of individual investigations cannot be disclosed due to the sensitive nature of the information*), and we continue to support service areas that require data analysis and monitoring.

6.3 We continue to regularly pro-actively cross check data sets within the Council in order to reduce ongoing fraud and error. To date in 2025/26 we have checked 406 matches, the savings from which are included in overall recordable savings in 7.1 below.

6.4 Regular reports and updates from varying sources such as the [National Anti-Fraud Network](#) (NAFN) and the [National Cyber Security Centre](#) (NCSC) are circulated across the Council by the Counter Fraud Services team to ensure knowledge and awareness are kept at levels suitable for the protection of the public purse and the public themselves.

6.5 We are committed to actively drive the risk assessment for fraud within the Council, to establish where the highest-level threats are and to ensure that wherever possible the Council is able to formally;

- ✓ Acknowledge the threat from fraud.
- ✓ Identify the risks.
- ✓ Develop a strategy of pro-active and responsive counter fraud work that fits with the Councils wider objectives and goals.
- ✓ Assist in assuring correct resources are applied to issues identified.
- ✓ Once the Fraud Risk Management process is embedded, information will be included in future Counter Fraud Report.

## 7 Recordable savings

7.1 In the current financial year 2025/26 the CFST have identified £357,736.40 savings (calculated using national indicators supplied by the Cabinet Office) across the Council and it is anticipated that further significant savings will continue to be realised in the second half of 2025/26.

- 7.2 In the last decade of recording 'Cashable and Non-Cashable' savings related to fraud it has achieved over £11 million in savings across all areas of business. This is a significant sum and continues to justify the Council's robust approach to countering fraud and re-assures the public that Plymouth City Council is serious about protecting the public purse its assets and its citizens.
- 7.3 Fraud is by its very nature a hidden offence and therefore it must be assumed that the savings made and shown here are potentially the 'tip of the iceberg' and that further savings are obtainable. The higher the awareness and the more assets that are available to address this issue, the higher the potential savings figures will be in the future.

## 8 Further information for Members

- 8.1 As noted previously to the Committee the UK's [failure to prevent fraud \(FTPF\) offence](#), introduced by the [Economic Crime and Corporate Transparency Act 2023](#), creates criminal liability for large organisations if their associated persons commit fraud with intent to benefit the organisation or its clients, and the organisation has not put reasonable fraud prevention procedures in place.
- 8.2 This offence came into effect on 1st September 2025 and aims to encourage a stronger anti-fraud culture within by making it easier to hold entities to account for fraud. Guidance from HM Government has been published [New failure to prevent fraud guidance published - GOV.UK](#). This aims to improve fraud prevention and protect victims.
- 8.3 PCC policies will be updated as a result of this legislation and reported to the Audit and Governance Committee in the annual Counter Fraud Report, the Council's compliance will also be reviewed as part of the annual best practice CIPFA assessment undertaken by DAP.

## 9. Conclusion

- 9.1 As has been stated before, there is much excellent work being done by the Council, its staff and those within DAP in order to minimise the impact from fraudulent activity, this is to be commended and encouraged. DAP will encourage and support further intelligent data driven initiatives, to save money and deal with potential fraud and error across the Council whilst increasing local resilience and awareness.
- 9.2 With greater integration of the regions counter fraud teams within DAP further intelligent data driven initiatives, to save money and deal with potential fraud and error will be put forwards to senior officers with a view to making Plymouth an area of groundbreaking activity in the Counter Fraud arena.
- 9.3 At a time when financial pressure has never been greater it is imperative that no stone is left unturned in the pursuit of those who would fraudulently draw services, assets, and money from the Council to the detriment of those in genuine need of support.

The Devon Assurance Partnership has been formed under a joint committee arrangement. We aim to be recognised as a high-quality assurance service provider. We work with our partners by providing a professional assurance services that will assist them in meeting their challenges, managing their risks, and achieving their goals. In carrying out our work we are required to comply with the Public Sector Internal Audit Standards along with other best practice and professional standards.

The Partnership is committed to providing high quality, professional customer services to all; if you have any comments or suggestions on our service, processes or standards, the Head of Partnership would be pleased to receive them at [Tony.d.Rose@devon.gov.uk](mailto:Tony.d.Rose@devon.gov.uk)

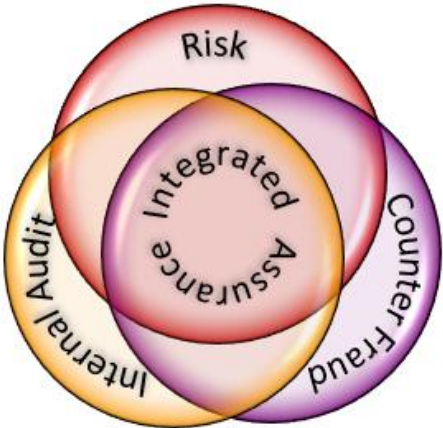
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Appendix 1 - Audit, Risk & Counter Fraud Integration  
Support, Assurance and Innovation

### Our Vision

To be the leading provider of assurances services covering internal audit, counter fraud and risk management to public and not-for-profit organisations in the South West and beyond.



Operational delivery

- **Assurance Audit** Plans based on the best and most up to date risk information.
- Agile **Internal Audit** Plan
- Live **risk management** reporting and support across the Council.
- Deliver a best-in-class **risk management framework**.
- **Counter Fraud** Team co-ordinate / undertake irregularities work coming through the **audit** plan.
- Potential irregularities triaged to **fraud or audit** for review. Use of data analytics.
- **Proactive fraud** work e.g. NFI, developing a delivery plan at client level.
- **Investigation** work to be completed jointly (where appropriate) to progress possible fraud review and strengthen internal control frameworks.
- **Audit** scoping to include **Counter Fraud** input.
- Three-way liaison confirming risk and control.
- **Integrated reporting** to be delivered where possible.

Our Goals

	Meet Client Needs	<ul style="list-style-type: none"><li>•Counter Fraud Strategy</li><li>•Integrated Audit, Risk and Counter Fraud Activity</li><li>•Easy access to additional services</li><li>•Respond jointly to client concerns</li></ul>
	IA, RM & CF Working Together	<ul style="list-style-type: none"><li>•Joint working practices</li><li>•Staff understanding of audit, risk and fraud interrelationships</li><li>•Assurance Officers</li></ul>
	Efficiency	<ul style="list-style-type: none"><li>•Joint reviews on client functions and operations</li><li>•Best skills from each team used at the right time</li><li>•Tell us once</li><li>•Joint outcomes</li></ul>
	Infrastructure	<ul style="list-style-type: none"><li>•Integrated resource management</li><li>•Joint Performance Reporting</li><li>•Joint infrastructure</li></ul>