



Strategy 2023-25



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Foreword

This strategic approach outlines our focus for 2023-25. Following the launch of the new **Public Sector Fraud Authority (PSFA) in August 2022,** the **Government Counter Fraud Profession (GCFP)** is now within the Practice, Standards and Capability Function of the Authority, operated by the 17 public sector organisations who collectively make up the Profession Oversight Board.



As per the Mandate¹ the PSFA core principles include **building capability.** The GCFP is the vehicle for achieving this, building off the launch in 2018, and recognising the remaining structures and services still to be built. The investment from the PSFA, with roots in the Cabinet Office and our integration with HM Treasury, stands us in good stead to deepen and broaden the offer from the Profession, for members now and in the future.



We wanted to share with you **our personal drivers** to build and grow the Profession, which is fuelled by the enthusiasm, knowledge and experience of those members and senior representatives from across all sectors, who have already contributed so much over the last few years, and who we know will continue to generously contribute their time and effort, to help build the career pathways, structures, tools and services for the future generations working to counter fraud.



Many of us did not have the luxury of a dedicated learning journey into counter fraud and very much had to seek out opportunities and make judgements on what suitable learning and development constituted. The GCFP can change this. We are building structures that offer dedicated pathways, and career development for the generations to come, building on the experience of the past. The counter fraud apprenticeship, spearheaded by HMRC is the first and others will follow.



An aim of the PSFA is that it becomes a beacon and destination for those working to counter fraud, we want to take that aim and multiply it - making counter fraud a beacon and destination for those entering the public sector and beyond - so we can attract, develop and retain the best candidates and build a cohesive system that allows future interoperability across sectors.



Counter Fraud is a key priority for the Civil Service, including at a ministerial level. Efficiency is at the heart of counter fraud, preserving vital public services for those most vulnerable and in need. This overall impact should drive us all to find the time and commitment to be part of the group moving forward that help shape and build the Profession, if not just for us and our teams, but more importantly for those professionals of the future.



^{1 &}lt;a href="https://www.gov.uk/government/publications/public-sector-fraud-authority-mandate">https://www.gov.uk/government/publications/public-sector-fraud-authority-mandate

Code of Ethics

It is important that, as well as having access to the right tools, techniques and practical guidance, professional members are clear on expectations around conduct and behaviour. Operating to protect the public sector, the integrity and standards we uphold are key, in line with the NOLAN principles and Civil Service Code of conduct. The additional behaviours and principles we expect in Counter Fraud are grouped in a bespoke **Code of Ethics** for members:

Professions are expected to have a Code of Ethics.





Courageous

Having the courage to hold challenging conversations with stakeholders to ensure the best outcomes.



Collaborative

Partner and collaborate with the wider fraud community and stakeholders inside/outside of your organisation.



Challenging

To challenge behaviour where the wrong decision is made or the wrong action is being taken.



Objective

Acting solely according to the merits of the case and serving governments of different political persuasions with commitment to objectivity and impartiality.

World Firsts

In 2018, the world's first public sector Counter Fraud Profession was launched by 17 public bodies, with approximately 3,000 members including from HMRC, DWP, Home Office, and the NHS. Since then, membership has expanded to c.7,000 members, across 47 organisations, and beyond central government to include policing and local government.

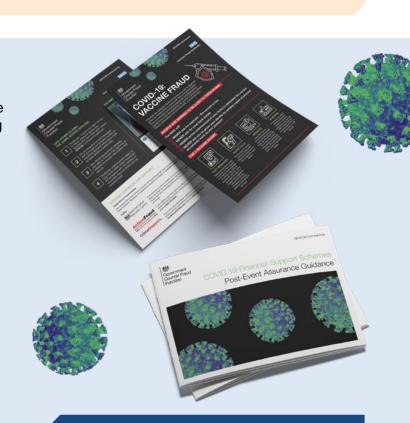
The Profession was also the first in the world to:

- Launch a bespoke leadership programme for SCS in counter fraud
- Deliver a dedicated level 4 apprenticeship in Investigation
- Have a unique code of ethics
- Set standards for practitioners in Fraud Risk, Intelligence, Investigation, Measurement, Counter Bribery, Leadership, Management & Strategy and Sanctions, Redress and Punishment
- Offer regular CPD and technical events via a community of practice
- Establish a professional journal for members
- Develop a cross sector advisory panel to drive development and growth
- Offer bespoke training on Fraud Risk Assessment for practitioners

The progression and growth of the Profession was significantly impacted by the COVID19 pandemic. The centre of the Fraud Function took the decision to pivot its resources to focus on supporting the increased level of fraud risk in pandemic support schemes - establishing the C-19 response team. The team led on understanding the threat, establishing intelligence, fraud risk assessments, data and post event assurance tools and services.

This decision was the right one for the taxpayer leading to significant outcomes. This has paved the way for how we deepen and broaden our service offer as we build the PSFA. However, we acknowledge the impact this had on reprioritisation of key resources away from the growth of the Profession and now want to take proactive steps to address this.

We start now a new chapter in the Profession, building on the Investigation and Intelligence capability we have identified and assessed. Now is the time to focus on the skills that were so valuable, and limited, in the early part of the pandemic - counter fraud. We want to build standards, learning and career pathways beyond the traditional core disciplines where the majority of members are. The new areas include risk assessment, fraud loss measurement and prevention disciplines.



The GCFP produced an intelligence led communications campaign to inform the public of specific COVID-19 fraud risks

Background

The PSFA launched in 2022, and a key principle is that it was to be **expert led.** The **PSFA has capability and expertise at the heart of it.** The continued development of GCFP will drive this, providing expertise to those working in the PSFA but beyond this across the Counter Fraud Function in HM Government (HMG).

The Government Counter Fraud Function (GCFF) includes 13,000 people across public bodies and departments, of which the majority are centred in HMRC and DWP. Expertise beyond this is inconsistent, with levels of capability and capacity varying.²

RUSI said in 2021, that **fraud is reaching epidemic proportions**³, and indeed, it's now the volume crime of our time. We are seeing that, unlike other crime types, its increasing in propensity year after year, as reflected in the ONS crime surveys.

Fraud is a significant issue in the public sector; the GCFF estimates it to be £33bn per year minimum that is lost to fraud and error. During the pandemic, we saw criminals further target the public sector leading to additional losses in the region of £13bn. The exact extent of losses is not yet known as post event assurance continues.

We operate in an environment where our adversaries continue to advance in their use of tools and technology, and the ability to commit economic crime on a global scale. This is alongside government services increasingly being digital by default and design, adding to changing risk, and challenges in response.

This accelerates the drivers for counter fraud professionals to keep their knowledge and skills up to date, and for them to understand how to deploy tools, such as data and analytics, to fight fraud on a mass scale. The modern fraud approach is to prevent fraud and not be solely reactive. We are increasingly understanding the importance of regularly monitoring and reviewing the skills of staff to target counter fraud - including measurement, fraud risk assessment and prevention.

Performance and evaluation of return on investment on unit costs is a key consideration for fraud leads. We can achieve this through innovation and the use of technology to help identify and tackle fraud at scale. With this in mind the GCFP strategy is focussed for 2023-25 on the following key areas set out on the next page.



- 2 Sources: NAO review of capability 2016 https://www.nao.org.uk/wp-content/uploads/2016/02/Fraud-landscape-review.pdf
 PSFA workforce and performance review 2022
- 3 https://rusi.org/explore-our-research/publications/occasional-papers/silent-threat-impact-fraud-uk-national-security

Objectives

The Government Counter Fraud Profession is a structure for counter fraud professionals across central government and beyond. It aims to bring the counter fraud community together under a common set of standards and develop that community as they protect public services and fight economic crime.

As part of this evolving community, members will not only gain recognition and credibility for their specialist skill set, but also have access to the standards, guidance and products to help members develop their own career – not just with a focus on investigation, but now with a move towards new areas of counter fraud, such as risk and prevention.

By ensuring that organisations across government know how to effectively prevent and tackle fraud, the GCFP puts HM Government in a much stronger position to deal with the challenges presented by fraud, bribery and corruption and enhances the UK's reputation as a global leader in this field.

The key objectives for 2023 onwards are set out below:

Building deep counter fraud capability **Continual development** for members **Investment in leadership** skills now, and future Increase marketing and promote the Profession **Increase diversity** and Inclusion



Building deep counter fraud capability

The time is now to consider how we shift from the focus on Investigation and Intelligence (c90%, of members are investigation and intelligence staff) and work where comprehensive structures exist to support those individuals, their learning and development and therefore a minimum level of assurance of their knowledge, skills and experience. To support those individuals, we will develop learning pathways in **fraud risk**, **prevention and measurement**.

Beyond this, how do we come together to share experience and knowledge to codify the practice of fraud prevention - including in the longer term, the development of new apprenticeships in counter fraud. This approach will over time lead to a broadening of membership and development of new skills - helping us to move beyond reactiveness and to start having an impact that stops fraud loss and harm across the public sector and beyond.

Aims in practice:

- We will develop Prevention standards for counter fraud practitioners, and update the Fraud Risk Assessment training online.
- We will develop learning products, including for Fraud Loss Measurement, helping to broaden membership and skills in counter fraud.

Implement continual development of members

In order to have an assurance post membership that those leading the fight against fraud for the public sector have the **requisite and current knowledge and skill required,** we have the opportunity to embed a culture and process for **ongoing assessment of knowledge and competence.**

We can achieve this by taking into account the approaches from other sectors, professions, and gaining insights from learning professionals. Together, with deep dives into different approaches, we can pilot models that, once tested, can be applied on a wider scale, taking a pragmatic approach to evolve and develop beyond the existing collective membership model.

Other professions, including Accountancy and law, have for a long time been operating a licence to practise system. This takes the principles of continuous learning and attaches a link to the ability to operate within given duties and roles. This may seem some way off for the Counter Fraud Profession, but maybe a collective goal we may ultimately aim to achieve.

To move towards this, we need to take, as outlined, the key learning points and principles from stakeholders, to ensure a fair, consistent and practicable solution. Currently, we have an environment where you can operate freely with no requisite knowledge, skills and experience, and indeed no consistent continual learning or assessment. Given the nature of counter fraud roles - which can lead to individuals losing their liberty and access to services, contracts and financial support- it is critical that we invest in moving towards a licence to practise system. This will bring confidence to those accessing public services, and bring greater recognition to those operating within counter fraud.

We will include as part of the technical deep dives and continuous professional development events a focus on the use of data and analysis, to equip members with the requisite knowledge and information to go further both individually and collectively in this space.



We have the opportunity to embed a culture and process for ongoing assessment of knowledge and competence.

Aims in practice:

- Members will be able to engage across their community of practice via the Knowledge Hub, enjoy the annual conference and receive regular media briefings on counter fraud. Quarterly journals will continue to be a core feature, and we will continue to provide secretariat support to lead the Profession, senior oversight, Practitioner, learning and cross sector groups. Members will be supported by product guides offering updates on a range of subjects and flagging changes to existing standards.
- We will also focus on the reintegration of a learning management platform, allowing a centralised hub where knowledge, skills and experience can be evaluated, development logged, and career support provided. By 2025, we will have developed a model for licence to practise for the Profession.

Leadership is key to the continued success of the Profession and the future development of all of those working within counter fraud as a Function.

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Investment in leadership skills now, and for the future

Leadership is key to the continued success of the Profession and the future development of all of those working within counter fraud as a Function. Not all leaders have had access to dedicated learning and experience in this field, which is becoming an increasingly complex field to operate in. We can be both **demanding and supportive of our leadership** so that they understand, build and develop the key knowledge skills and experience, defined and agreed by the cross government oversight board for the Profession.

Building on the Foundation of the Leadership, Management and Strategy standards which set these out, we have the opportunity to bring to life the content to focus on the development of senior leadership across the public sector. The Profession has for some time had the aim, as set out in the UK Anti Corruption Strategy, to open up membership to senior leaders and now, through the PSFA, has the resources to build the **Counter Fraud Leadership Programme (CFLP).**

The CFLP will equip candidates with the skills and knowledge needed to be effective leaders in this complex field, including business ethics, counter fraud knowledge and strategy development. The course also covers fraud risk assessment and how to successfully obtain investment.

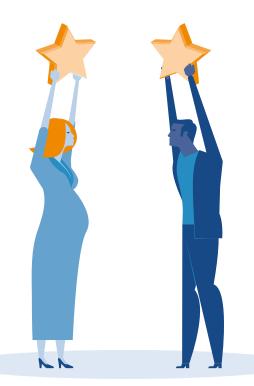
The design of the course ensures that the cohort will learn together, and move through the modules successfully, pausing to consolidate knowledge in a grouped way. This approach will strengthen the leadership skills and community, vital for engagement and cross agency working. Together the cohort can share insights, challenge and support each other to achieve more.

Longer term ambition in this area includes the development of cross organisational talent management, to identify future and aspiring leaders, as well as industry secondment - offering opportunities both ways to help leaders broaden their skills and experience.

Aims in practice:

- CFLP will be live, and an immersive residential programme will complement and support this, leading to the evaluation of the first Leadership members to the Profession in 2023.
- We aim to build on the success of the CFLP and offer this learning opportunity on a rolling basis, considering how we can broaden the offer beyond public sector organisations and to other jurisdictions. There is a future ambition to build a variant of the course, in alignment to other Functions in the Civil Service, to offer a programme of Counter Fraud for non fraud leaders - providing an introduction to the basics of understanding fraud and economic crime.
- We will also seek to introduce a talent management programme, with focus on future leaders, centred on inclusion, social mobility and how we build leadership for the next generation.

We also seek to introduce a talent management programme, with focus on future leaders.





Increase marketing and promote the Profession

An important aspect of this strategy is the continued marketing and promotion of the Profession. In order to raise the profile of the Profession, enhance the recognition of existing members, and encourage future ones, it is important to seek out opportunities to communicate regularly with a variety of audiences. We will achieve this through a variety of activity led by the Profession also by participating in cross sector/wider forums to maximise our reach. This activity will be baked into the PSFA communication strategy/action plans.

Aims in practice:

- We will hold an annual conference for members, raising awareness of the Profession, its service offerings and help to build the recognition of those valued members. We will continue to offer the quarterly professional journal, and supplement this with regular member updates on Knowledge Hub and other channels. We will also take opportunities at external events, including internationally, to promote and raise awareness of the approach and success of the Profession development and seek out information to help us develop at pace and to a high quality by learning from others.
- In 2023 we will support the first apprenticeship conference, offering a bespoke forum for those newer to the Profession, to meet and engage with the aims and objectives of the Profession, and each other.

Diversity and Inclusion

Underpinning the growth and development set out, is an ambition to build an inclusive and diverse Profession. When last surveyed, the indication was that the Profession was, on average, white, male and mid 50 years of age. The Profession should be representative of the public it serves, and the public services and systems it seeks to protect. It should also be built with the aim of evolving and benefiting future generations, and this includes those from all backgrounds, and not letting specific characteristics or social mobility be barriers to entry into the Profession. We will also reflect on how we actively seek out members of minority groups, and those from lower socio economic backgrounds.

Aims in practice:

- The Profession will consider, when developing products and services, how we can include a diverse range of stakeholders, and actively seek out alternative and minority views, where they are not readily available. This includes an ambition to diversify the governance structures, such as boards and panels to be more representative.
- We will also plan how we can target support via the Profession to reach those in under-represented groups, with bespoke learning offers, as well as mentoring, coaching and career development advice/ services.



GCFP in the PSFA Mandate

The Mandate for the PSFA sets out a clear aim to increase the capability of those working to counter fraud. The Mandate also sets out the Functional and Ministerial Department and Public body responsibilities.

These include how it will:

- Bring together cross sector expertise to create practice and guidance for countering fraud bribery and corruption.
- Promote effective counter fraud activity by regularly publishing guidance.
- Set out, and maintain, the Counter Fraud Function and practice standards.
- Oversee, develop, and operate the Government Counter Fraud Profession.
- Work with cross sector experts to build training where gaps identified.
- Understand leading international practice and integrate these into practice, standards and guidance.



For the Profession specifically, the mandate outlines the GCFP will:

- Identify instances where new practices or standards should be developed or reviewed.
- Bring experts from across sectors to set requirements for fraud professions in terms of knowledge skills and experience at each level and in each discipline.
- Develop a licence to operate model, which will ensure continuous professional development for Counter Fraud Profession members.
- Provide the structure for the assessment and accreditation of fraud specialists.
- Build pathways for counter fraud talent development across government.
- Understand the overall training market, define where there is training that meets the standards and build assurance over the quality of training.

The PSFA Mandate should be used by the PSFA and ministerial departments and public bodies as a reference point on how they interact with each other.



Principles

How we develop and evolve the Profession has always been a key consideration for those in the centre, now operating from the PSFA, who are developing the strategy for the sign off and approval of the cross government oversight board. The oversight board is made up of 17 organisations⁴, supported by a cross sector advisory group. On the Board, each organisation has an equal voice, and equal opportunity to influence and shape the direction of travel.

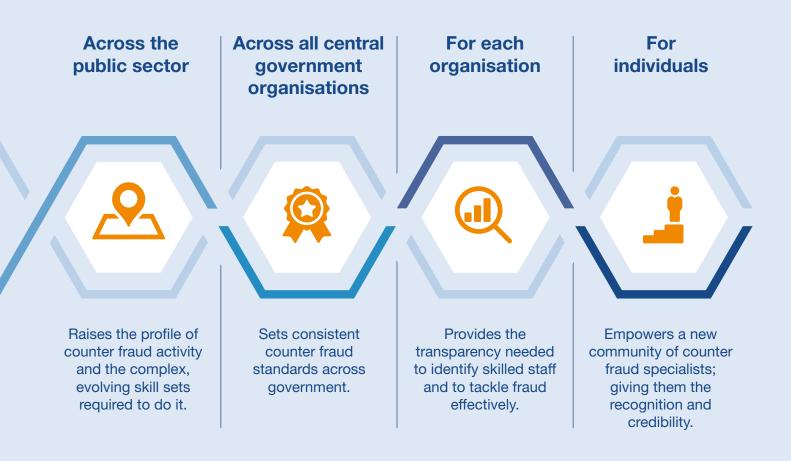
We have always operated on the basis of **choice**, and that departments and agencies can choose how and when they interact with the Profession. The GCFP has been, and will continue to be, built through **collaboration**. Specialists came together to create it from different organisations across government and beyond. They had a vision for a more comprehensive, cohesive and recognised structure in which to develop themselves and their skills, and a passion to make it happen.

The PSFA has allocated 16 FTE to the centre of the Profession. This is more than we had at launch 2018 (4 FTE) and represents the continued investment and support for this initiative. However, together with the support of wider members and experts in your fields, we can achieve so much more, and at a greater **pace.**

Counter fraud is complex and there are many disciplines represented. To make it truly representative, and to ensure the quality and effectiveness of products and standards developed, it has been, and should continue to be built by experts, for **experts.**

We exist to recognise and support the members we represent. All members and stakeholders hold an equal voice in how we grow and shape the Profession, and we **empower** them through this operating model.

4 DWP, HMRC, NHSCFA, DHSC, MOD, HO, HMPO, LR, COLP, CPS, SFO, NCA, NR, GIAA, SLC, IS, CO



Benefits to members

The driver for the creation and development of the Profession is the members who we serve and seek to support, to reach their full potential. The benefits to members are threefold as outlined below, and inform the direction and scope of the strategy:

Join an active counter fraud community



The GCFP has ambitious plans for its members. It hopes to build an active community of counter fraud specialists across the public sector and beyond; and members will receive regular news and updates relevant to counter fraud.

Greater recognition and credibility



The GCFP gives recognition and credibility to those with counter fraud knowledge, skills and experience. By being recognised as a member of the GCFP, members can show that they have a level of expertise beyond those who are not in the Profession. They will also have a common Code of Ethics.

Empowered to control your own development



The GCFP provides transparency across all disciplines used to counter fraud. Members are able to self-assess themselves against a set of common Professional Standards and Competencies, and develop their own personal development plans against a range of Disciplines. For example, those working in investigation will be able to assess their skills in carrying out risk assessments.

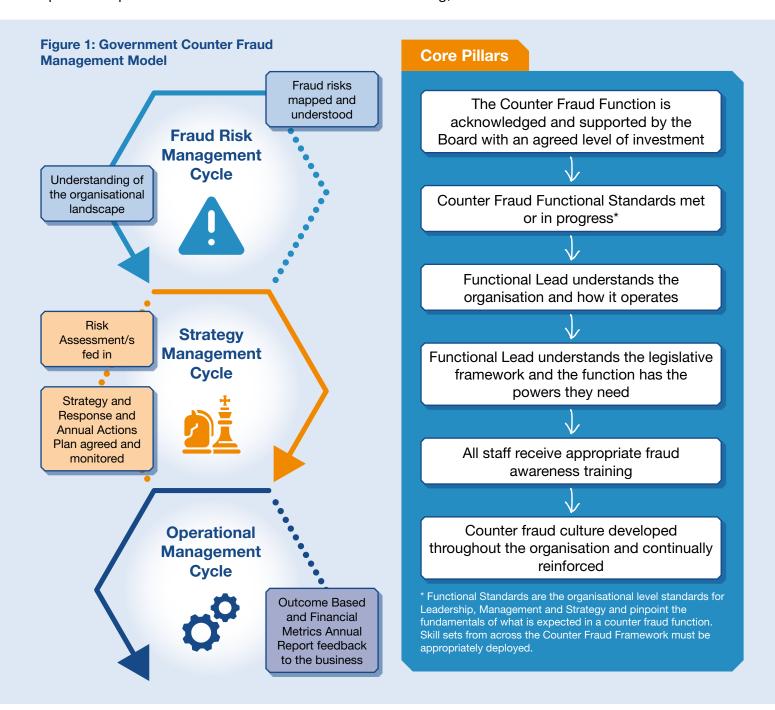


Delivery mechanisms

The Strategy will build and embed knowledge across organisations on leading national and international counter fraud practices. It will cover the key disciplines of countering fraud, drawing on the framework and practice standards of the Profession, specifically Leadership, Management and Strategy (LMS).

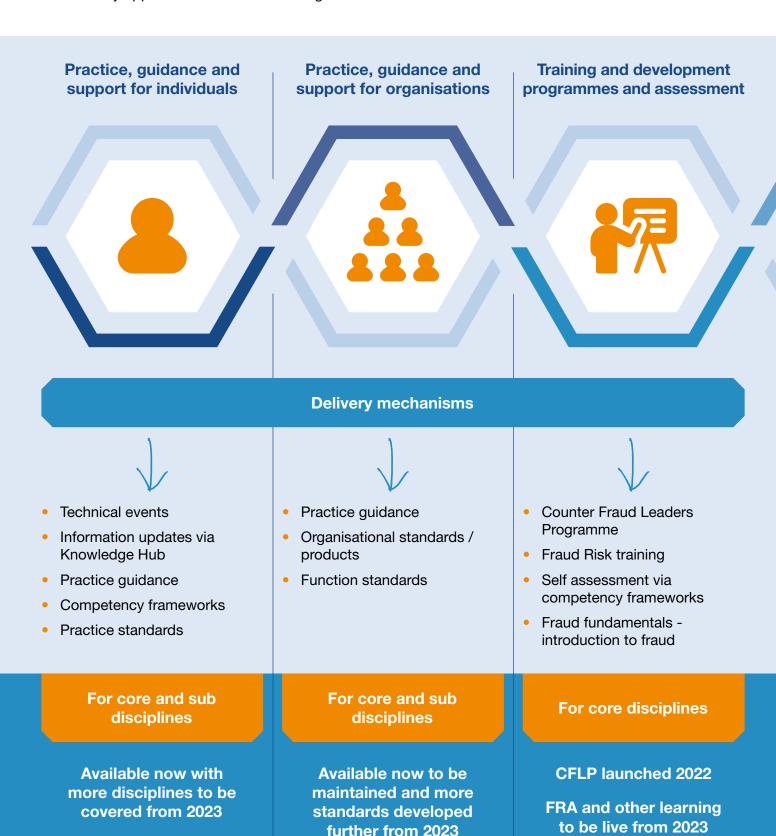
Figure 1 provides an overview of what good counter fraud management looks like, as agreed in the fraud management cycle of the LMS practice standards. This articulates the diverse range of activities and capabilities required to effectively manage fraud.

The Profession will embed knowledge and practice across these core and sub disciplines through a range of offerings, including information updates via Knowledge Hub, a range of technical sessions, annual updates on practice standards and formal Practitioner training, as outlined below:



Approach to practice, guidance and standards

The Profession develops practice, moving to leading practice products and training using a continuous improvement approach of understanding needs, creating content, embedding knowledge and practice, and evaluating impact and effectiveness. This content informs the onward development of practice standards. The delivery approach is set out in the diagram below.



Counter Fraud Framework

The GCFP provides pathways for individual capability building and career development, through access to the **Professional Standards and Competencies**.

These detail the knowledge, skills and experience expected of those working in a variety of counter fraud roles across the public sector. They include Data Analytics, formally developing the GCFP beyond the historical focus on investigation. These also offer a framework through which an organisation's learning environments or an individual's knowledge, skills and experience can be assessed when they apply to the GCFP, and as they develop throughout their career. The Professional Standards and Competencies are broken down into different disciplines and grouped in this framework below, including Risk Assessment, Measurement and Prevention in 'Counter Fraud' recognising the variety in activity within the Profession.



Competency levels

We recognise the need to build an inclusive Profession and different routes for members to take, as they progress through their counter fraud career. This may be in one or more disciplines. To aid this the Profession offers a range of competency levels.

The different levels include demonstration of knowledge at Foundation and to progress to Practitioner, the member moves beyond knowledge alone to demonstrate their skills in delivery and practical application. For those members who have a level of competence and breadth of knowledge beyond Practitioner, they can move to Advanced Practitioner.

The Profession is still building the structures (practice and standards) that underpin the disciplines. Once developed there will be routes to progress between levels, such as a knowledge check at Foundation, a portfolio and continuous assessment for Practitioner, and an enhanced knowledge check plus assessment for Advanced Practitioner. A longer term ambition is to introduce a licence to operate model to support and assure the continuous learning aspect of individual assessment.

Trainee

Foundation

Practitioner

Adv. Practitioner

Have a developing level of competence, building initial knowledge of relevant legislation principles and counter fraud practice. People will only be at Trainee for a set time.

Have the Foundation of knowledge and skills to be able to deliver that element. Have the ability to explain and demonstrate knowledge of relevant legislation, principles and counter fraud practice.

Have demonstrated they can apply their knowledge and skills in delivery. They demonstrate practical application of relevant legislation, principles and counter fraud practice in their role.

Have a level of competence, and breadth of knowledge beyond Practitioner, the ability to interpret and evaluate complex principles and develop counter fraud practice/processes for others.

What success looks like ... 3 years from now

Let's pause for a moment and fast forward to **2025.** What will the Profession feel like to members, and what services, tools and products will they be able to access? What will the benefits be in 3 years time to organisations invested now, and in the future, in the Profession? Will we have taken the necessary steps and shifted to a counter fraud Profession?

By 2025...

- Members will receive regular invitations to technical events, updating them on the changes to standards/legislation/practice approaches, and attendance is logged via the learning management platform, helping to support the focus on continuous development.
- There will be a suite of learning opportunities, some driven centrally via the PSFA, others will be accessed via third parties and the private/not for profit sectors, with advice from the centre on the quality of the offers.
- There will be a range of membership routes open, in counter fraud disciplines, Prevention, Data and Analytics, and paths in beyond collective membership, meaning the membership will have swelled from 7,000 to over 10,000 and from 45 to 50+ organisations represented.
- Members will build their networks beyond their parent organisation, using Knowledge Hub to drive discussion and the sharing of good practice.

- The journal will continue to be issued with a range of cross sector insights.
- There will be a significant proportion of SCS leaders and leaders across the Fraud Function who will have completed Counter Fraud Leadership Programme successfully.
- The Counter Fraud course for Non Counter
 Fraud leaders will be established and has a good take up from those working in other Functions.
- There will be more apprenticeship opportunities in Counter Fraud.
- There will be an embedded licence to operate model, predicated on continuous development and will have been trialled in investigation and intelligence, and will be rolled out for Counter Fraud disciplines.
- There will be a recognised talent management programme, for future leaders, working in partnership with other sectors, and jurisdictions and has a focus on inclusion, such as programmes targeting social mobility/equality.



How will we measure success?

The Practice, Standards and Capability Plan (see **Annex A**) outlines how we will monitor and evaluate our progress in building capability across member organisations, including key milestones. Our measures of success are:

- Members have increased confidence in their knowledge and ability to understand, prevent, detect, and counter fraud.
- Organisations are meeting, to a high extent, the CF Functional standards.
- Members have access to high quality and relevant learning products.
- Demand for the Profession's products and services increases over the specified period (2023-25).
- Members receive regular technical updates and alerts relevant to their area of practice.
- Members are able to self evaluate their knowledge and skills and are confident in their development areas.
- Organisations have confidence in the assessment of individuals and have information to understand who has requisite skills and who does not.

How will we assess success?

This is still being developed in full, but we are starting to consider how we will assess success, now and in the lifetime of the strategy.

- PSFA led performance and assurance reviews will help monitor the trends of fraud prevention, detection and adherence to the Counter Fraud Function standards.
- A pre and post-engagement survey will be conducted to measure the quality and relevance of the service offerings, and the change in confidence and ability of members to prevent, detect, and measure fraud.
- Assessment will be incorporated into the directly offered Counter Fraud Leadership Program/
 Fraud Risk Assessment training, to assist them in meeting the learning objectives. A further survey will be conducted 3-6 months post-completion of the program to obtain a longer-lens measurement of its relevance to a leaders/ officers on-the-job activities and its impact in improving their ability to counter fraud effectively.

These qualitative findings will be utilised to consider the necessary steps to developing a pathway to a Counter Fraud Profession post 2025.

Here to help and support

The Government Counter Fraud Profession is still evolving. However, there are already a number of resources available to support individuals and organisations. These can be found through the channels outlined below.

You can directly contact the PSFA by emailing PSFA@cabinetoffice.gov.uk or visiting www.gov.uk to find out more.



ANNEX A - Action plan 2023-25

Counter Fraud Leadership Programme live

> Fraud Risk Assessment Operational

2023

2024

Apprenticeship in Counter Fraud scoped

Fraud Fundamentals training for all leaders live Licence to operate model developed

Talent management process live

2025

