



The Insolvency
Service

Investigation and Enforcement Strategy

2026 to 2031



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Forewords

Minister Justin Madders

I am pleased to publish this strategy, which sets out a transformational and forward-looking plan for the investigation and enforcement functions of the Insolvency Service and is an important part of its strategic aim to tackle wrongdoing and protect from harm. The agency plays an important role upholding corporate standards and tackling a range of fraudulent and other criminal activities harming businesses and consumers. By harnessing the unique capabilities of the Insolvency Service, we can do more to demonstrate to the public that rogue actors will be held to account – supporting confidence in our economy and this Government’s agenda to deliver growth.



**Minister for
Employment Rights,
Competition and Markets**

This strategy represents a significant change to the way the Insolvency Service interprets its investigative functions and its interactions with other regulators and the wider insolvency profession, giving it a wider corporate enforcement remit and strengthening the collective fight against fraudsters and others who would seek to abuse corporate structures.

The strategy marks the start of an exciting new chapter for the Insolvency Service. I am looking forward to seeing the agency deploy the full range of its investigation and enforcement powers in new and more expansive ways, supported by funding from fees charged by Companies House. Ensuring that the Insolvency Service has the people, tools and resources to deliver this strategy will be important in maintaining the UK’s reputation as a safe and trusted place to do business, creating a level playing field and an environment that encourages investment and economic growth.

Dave Magrath and Jonathan Lupton

The Insolvency Service has a long and successful track record of protecting the insolvency regime. We have an experienced and dedicated workforce who are committed and motivated, delivering high quality results. Acting against those who are unfit to run companies reduces the harm caused to legitimate businesses and creditors, and creates a prosperous environment that supports economic growth.



Dave Magrath
**Director of
Investigation
and Enforcement
Services**



Jonathan Lupton
**Director of
Legal Services**

This work continues to be vital, with over one thousand directors disqualified during 2024/25. We must remain vigilant however to emerging threats and continue to evolve and enhance our capabilities to ensure we remain capable of driving corporate and insolvency standards through effective enforcement.

The role played by the agency is evolving in support of Government ambitions to tackle economic crime and to improve standards of corporate behaviour. The introduction of the Economic Crime and Corporate Transparency Act highlights this policy ambition and mandates the agency to broaden its remit and play a more prominent role in corporate enforcement. Our objectives to improve corporate standards of behaviour and have a greater impact in enforcement outcomes are recognised in the planning for our next agency strategy. Over the course of this strategic period our investigation and enforcement services will develop. We will increase capacity to prosecute more offences, increase our enforcement against companies that act against the public interest, and freeze and forfeit criminal proceeds. This will change the Insolvency Service's centre of gravity in the enforcement space, from primarily being insolvency misconduct and crime focused, to having a wider corporate remit.

To remain at the forefront of insolvency and corporate enforcement we must ensure our teams have the tools they need to address misconduct in all its forms. Through continuous review of the effectiveness of our powers, we will ensure our legislation provides the modern enforcement platform our teams need to be effective. This will involve a review of the disqualification framework and our powers to investigate live companies, to make sure they are fit for the future and provide us with the capabilities we need to succeed.

Understanding the range of threats in the corporate landscape will rely upon delivering an enhanced proactive intelligence resource, capable of playing an active part in UK and international law enforcement whilst delivering strategic products that drive agile and dynamic prioritisation and resourcing decisions. Societal reliance on technology continues to evolve at a rapid pace, with those involved in criminal behaviour also using these developments to facilitate wrongdoing. It is essential that the agency responds to meet this challenge through the adoption of cutting-edge technology and the upskilling of our workforce to be adept at maximising digital opportunities. Working with public and private sector partners, we will invest in our enforcement systems to ensure increased linkage with public sector partners whilst exploring artificial intelligence (AI) and data analytics solutions to drive efficiencies and increase our ability to target the most harmful offending.

Our enforcement capabilities benefit from a specialist internal legal team working in collaboration with our investigators and our digital forensic resource. This approach allows us to combine skills and drive investigations forward, considering and mitigating risks throughout the enforcement process. We will continue to leverage this expertise, particularly in complex cases, to maximise our response.

We are committed to increasing our reach and impact across the devolved nations. We will deliver this capability through creating effective partnerships with law enforcement and legal partners, to ensure that our enforcement approach is effective and consistent across the UK. This will close gaps in enforcement coverage across the UK that can be exploited by bad actors.

As we move into this new strategic period for our enforcement, our strengthened and enhanced capabilities will be shown through the outcomes we deliver. We will secure more impactful director disqualifications and disrupt the activities of those who seek to act against the public interest and abuse limited liability. We will obtain more prosecutions in a greater spread of offences, recover more proceeds of crime and increase our results in anti-money laundering. By playing a more prominent part in disrupting criminal activities we will provide a greater deterrent to those who would abuse corporate structures or fail to meet the standards expected of directors. We will supplement this work with a renewed drive and focus on director education, encouraging good behaviours and raising corporate standards.

Over the period to 2031, this strategy will ensure we uphold the UK's world-class insolvency regime while widening our approach and remit across the corporate sphere to provide the effective enforcement the marketplace needs and to ensure the UK remains a safe and fair place to do business for all.

Introduction

The Insolvency Service is an executive agency of the Department for Business and Trade with responsibility for, amongst other things, administering bankruptcies and company liquidations, investigating related financial misconduct, and enforcing company and insolvency legal frameworks in the UK.

Charged with upholding insolvency and company law standards for over a century, the Insolvency Service has seen its role evolve during that time, implementing modern approaches to maintain standards whilst encouraging entrepreneurialism, such as the introduction of director disqualification orders, and later compensation orders. The transfer of functions from the Department for Business, Energy and Industrial Strategy (BEIS) in 2017 saw the Insolvency Service become its own prosecuting authority.

We carry out a unique range of civil and criminal enforcement activities to support government objectives of building economic confidence and growth. We have a distinct role and a clear mission to maintain the UK's reputation as a safe place to do business.

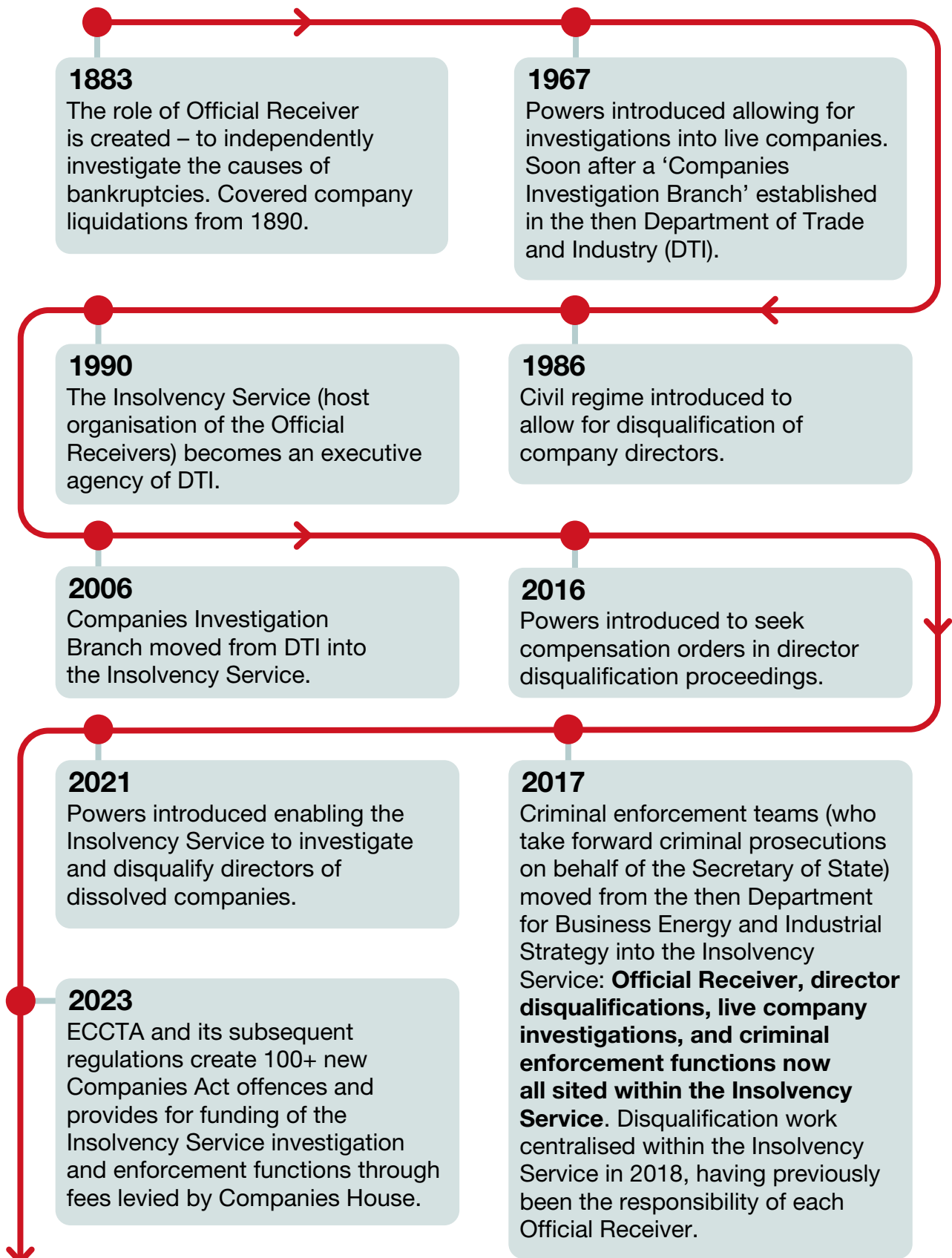
Traditionally, our role has been heavily focussed on the investigation and enforcement of insolvency offences such as bankruptcy restriction orders, director disqualification and insolvency related prosecutions and recoveries. The Economic Crime and Corporate Transparency Act 2023 (ECCTA) expands our enforcement responsibilities and fundamentally changes how our investigation and enforcement activity is financed by providing a sustainable source of funding allowing for growth in both our headcount and capabilities.

Coupled with the constantly changing nature of economic crime and the associated reform of Companies House, this is the right time for the Insolvency Service to continue its evolution by expanding our remit to play a more prominent role in the fight against economic crime.

As our investigation and enforcement role evolves, so must the way that we deliver our mission. We must continue to build on our successes but also seek out and remedy areas in which we risk falling short of what the public needs to maximise our impact and reach. This, our first dedicated enforcement strategy, sets a clear vision to do just that and will help us to adapt to our new, broader role over the next five years.



Key moments in the history of our enforcement functions



Core Objectives

This strategy represents one of the key strands of our forthcoming agency strategy which will be launched at the beginning of 2026.

To help deliver our aim to tackle wrongdoing and protect from harm, our enforcement and investigation work will be shaped around three core objectives:

- 1. Enforcement of the UK's insolvency framework**
- 2. Enforcement of the Companies Acts and associated legislation**
- 3. Tackling economic crime facilitated through companies**

Enforcement of the UK's insolvency framework underlines the vital contribution active enforcement makes in upholding insolvency standards and will remain a key objective as we move into this new strategic period.

Each year we calculate the value of our civil enforcement activity to the UK economy based on methodology approved by the public sector fraud authority. For 2024 to 2025 the economic benefit of our disqualification work is calculated to be in excess of £36 million, with the economic benefit of our bankruptcy restrictions work calculated at over £7 million.

During the strategy period we will:

- Continue to prioritise high profile and nationally significant insolvency cases drawing on our existing expertise and skills to ensure we tackle financial wrongdoing.
- Collaborate with partners and use our unique powers to identify and root out those who would seek to abuse the insolvency framework and utilise insolvency avoidance schemes.
- Work collaboratively with HM Revenue and Customs (HMRC) and Companies House to identify and address those who fail in their obligations to HMRC and support HMRC in their work to increase tax revenue by tackling fraud.

Enforcement of the Companies Acts and associated legislation and upholding corporate standards across the UK are of the highest priority. We will work closely with our key partner, Companies House, to support their work to ensure the integrity of its registers whilst maintaining focus on directors who breach their disqualifications. We will use our powers to help tackle poor employment practices by companies. We will continue to educate directors on their duties and responsibilities, and the consequences of misconduct whilst acting as a company director.

By winding up live companies where there is evidence that they are being used to facilitate corporate abuse, we protect both the public and the integrity of the company register and provide wider benefits to the economy, estimated at over £14 million during 2024 to 2025.

This work also creates a range of non-monetised benefits. For example, tackling misconduct deters other directors who might otherwise have been tempted to engage in misconduct. Another aspect is the standards effect, where the tackling of misconduct helps to improve the standards of company stewardship to the overall benefit of creditors. Enforcement activity promotes confidence in the market by ensuring fair competition and a level playing field for businesses.

During the strategy period we will:

- Work increasingly collaboratively with Companies House to better uphold the Companies Acts and related legislation, by:
 - Seeking to agree common objectives in recognition of our key investigation and prosecution partnership across a wider range of offences
 - Integrating our intelligence functions
 - Building up a pipeline of referrals driven in part by the compliance priorities of Companies House
- Review our corporate civil enforcement regime, including powers to investigate live companies to ensure we have the most effective tools for the future.
- Expand our resource by utilising funding flowing from the Economic Crime Levy to develop programmes and analysis to boost capability and specialisms within our teams.

Our vision is to take a more prominent role in **tackling economic crime facilitated through companies** by elevating economic crime as a distinct and significant objective, in addition to our historic focus on enforcement of the Companies and Insolvency Acts.

We plan to deliver this by leading on more cases featuring fraud and money laundering where we are best placed to do so and, in close collaboration with Companies House, we will deliver richer and joined-up intelligence on potential abuse of corporate structures in economic crime.

During the strategy period we will:

- Tackle the threat of fraud against the Government and abuse of government support schemes such as grants and COVID support loans, prioritising cases identified as highly likely to have involved fraud, and pursuing those responsible and obtaining sanctions against them, including compensation orders and prosecutions.
- Establish deeper partnerships within the National Economic Crime Centre (NECC) and relevant agencies. Close collaboration with other enforcement agencies and raising our profile on economic crime is critical to the success of our new strategy.
- Uphold the integrity of the company register by prosecuting directors who fail in their responsibilities to the registrar and who use limited companies as vehicles to facilitate economic crime. Expansion of our work under the Proceeds of Crime Act (POCA) to freeze and seize money obtained from crime or which is intended to be used for criminal purposes is also a priority.

We are integrating our intelligence function into the wider economic crime landscape by deepening our partnerships with a range of enforcement bodies such as the NECC, HMRC, the Financial Conduct Authority, City of London Police, the Serious Fraud Office and others.

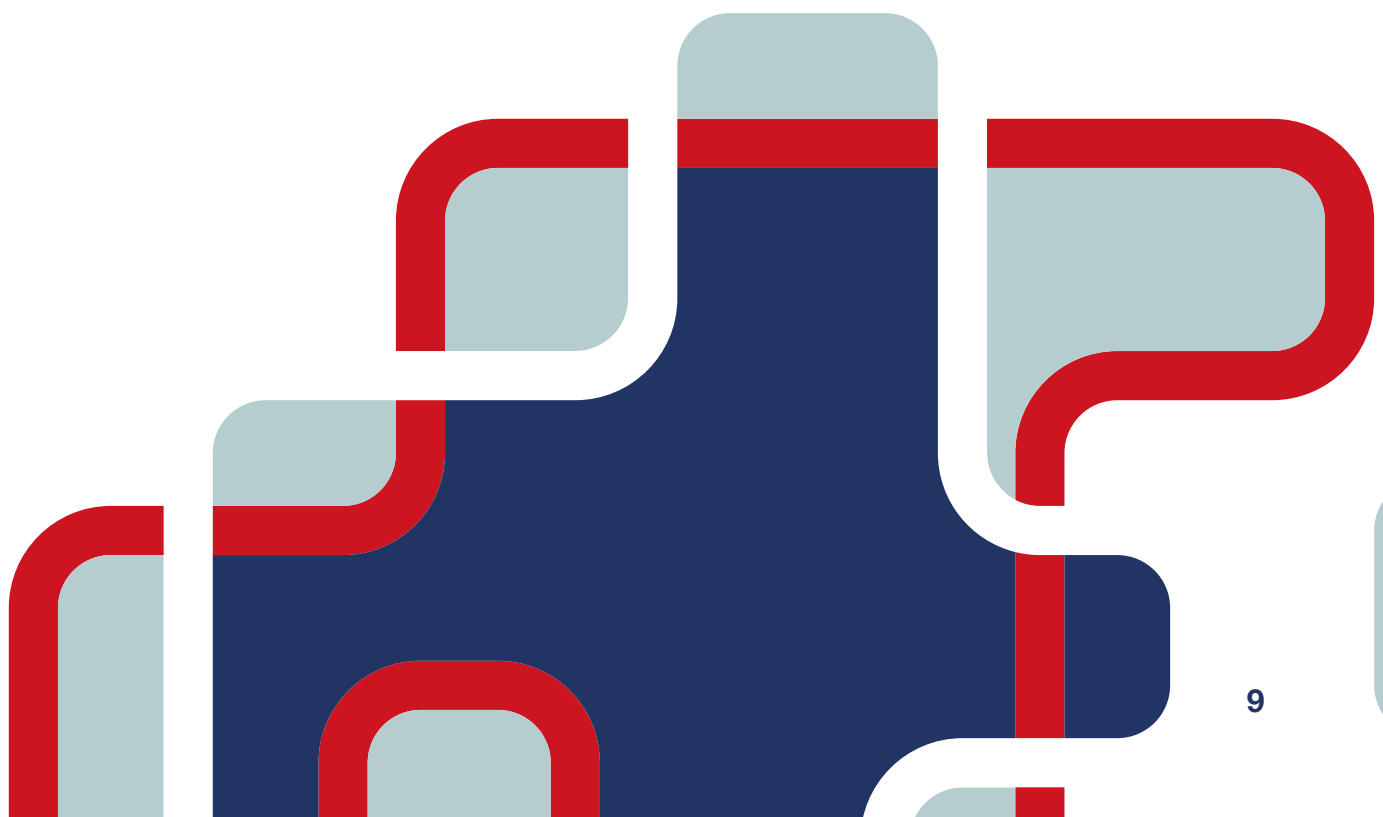
The publication of this investigation and enforcement strategy marks the start of an exciting new chapter for the Insolvency Service. Enforcement of the UK's insolvency framework and the Companies Acts remain key objectives for the Insolvency Service whilst the reforms introduced through ECCTA will allow us to play a more expansive role in the wider enforcement landscape.

We will deliver against these objectives by building capability across four strategic pillars:

- **Our Powers and Capabilities**
- **Technology and Data**
- **Partnerships**
- **Our People**

This strategy gives us the framework and direction to capitalise on the reforms introduced by ECCTA by working closely with partner organisations to map out our joint capabilities linked to our expanded enforcement role and build on our existing strong foundation of highly skilled, multi-disciplinary teams of experts. We will give our people support, targeted training, and the tools to do their job effectively to drive engagement and give them the confidence to make bold pragmatic decisions and deliver on our more expansive role.

Supported by proactive intelligence gathering, we aim to keep pace with demand in the fight against bad actors who would seek to abuse the insolvency framework, manipulate victims, and take advantage of the corporate landscape leading to greater impact in our enforcement outcomes to support growth of the UK economy.



Our Purpose

The Insolvency Service is the primary agency enforcing the company and insolvency legal frameworks in the UK and conducting related enforcement work to uphold the integrity of our business environment. We build trust in the economy by tackling and deterring wrongdoing to raise corporate standards, prevent financial harm and help safeguard the marketplace.

We enforce the legal responsibilities of those running and owning companies, as well as people subject to bankruptcy and debt relief orders. We help to safeguard the marketplace and protect the public from directors who have mismanaged companies and those who use corporate structures or abuse the insolvency regime to facilitate crime, ensuring a level playing field for business.

We also have regulatory responsibility for the insolvency profession and act against those who undermine the insolvency regime.

We do this by deploying the unique combination of capabilities vested in us by the Secretary of State for Business and Trade. We use our powers to investigate misconduct and hold wrongdoers to account, disrupt criminality, and recover losses where appropriate. We build key partnerships and share intelligence to protect people from financial harm, and we educate company directors to raise the standards of corporate behaviour.



Our Vision 2031

Our vision is to play a more prominent role in the fight against economic crime and be recognised as the UK's leading authority in enforcing corporate and insolvency standards by working collaboratively and innovatively. Over the next five years we will build on our current and future capabilities whilst continuing to maximise the use of our powers and our specialisms to promote a transparent, safe and fair business environment.

Our continued focus will be on pursuing directors who fail to fulfil their obligations, quickly identifying threats and responding promptly and decisively to the issues of the day whilst continuing the fight against phoenixism. We will take decisive action against those who seek to breach the UK's insolvency framework.

In collaboration with our partner agencies, we will continue our enforcement of the Companies Act and associated legislation, specifically targeting the misuse of corporate structures. We aim to elevate our profile in combating these types of misconduct while forging stronger partnerships with other relevant agencies.

With Companies House as an active gatekeeper, empowered to scrutinise company creation and registration, we will ensure compliance through data sharing, information management, and criminal sanctions.

Our commitment to enforcing these reforms will drive our mission forward. We will lead in criminal investigations, targeting non-compliance with the Register of Overseas Entities, and addressing the misuse of UK property for laundering illicit funds and other illegal activities. We will use these new powers to disrupt insolvency avoidance schemes and enhance our enforcement and criminal capabilities across the devolved nations.

By meeting our objectives during the strategy period, 2031 should see us as a leading enforcement agency in this sector tackling the harmful issues of the day. We will have a highly skilled and committed workforce supported by contemporary technology. Our intelligence teams will be an integral part of the law enforcement community, we will be recovering more money, and using our capabilities to tackle money laundering and the challenges posed by crypto, artificial intelligence and high harm offending.



Enforcement of the UK's Insolvency Framework

- The Insolvency Service is the leading agency securing the disqualification of directors who abuse their position to remove bad actors from the marketplace and prevent future harm.
- During 2024/25 the Insolvency Service disqualified 1,036 directors and secured 121 compensation orders and undertakings with a total value in excess of £3.7 million.
- The average director disqualification tariff was 8.5 years, with 20% lasting in excess of 10 years, and an estimated net benefit to the economy of £36 million.
- A director who fraudulently secured a £50,000 Bounce Back Loan was:
 - sentenced to 20 months in prison, suspended for 18 months
 - disqualified from acting as a company director for a period of three years
 - ordered to complete 300 hours of unpaid work and make a £2,000 contribution to the prosecution costs incurred by the Insolvency Service
 - subsequent confiscation proceedings brought by the Insolvency Service led to the director being forced to sell their residential property and motor vehicle in order to repay the £50,000 Bounce Back Loan in full
- Through our traditional insolvency case pipeline, investigations have opened up wider fraud and criminality including employment of illegal workers and intelligence platforms indicating human trafficking.
- Use of Fraud Act convictions alongside our disqualification powers in a case featuring fraudulent use of £700,000 across multiple companies and allegations of phoenixism abuse led to a prison sentence of two years four months and a maximum 15-year disqualification period.



Enforcement of Companies Acts and Associated Legislation

- In another example, through our developing partnership with Companies House, investigations have been initiated on circa 2,000 companies relating to the abuse of dormant company status involving directors based overseas with links to tax avoidance, tax evasion schemes and money laundering.
- The Insolvency Service used live investigation powers to close down multiple corporate rescue firms who breached insolvency laws by misleading struggling directors to sell their businesses, whilst removing assets, and avoiding liquidation.
- The firms falsely claimed their services were ‘a legal alternative to using insolvency practitioners’, misled former directors by facilitating sham sales of their businesses, and incorrectly advised directors they would have no further responsibility for their company or its debts.
- Genuine purchasers for the businesses did not exist but instead the firm operated a scheme to help former directors and owners disassociate themselves from their company debts whilst keeping any assets for themselves.
- As a result, assets belonging to affected companies with an estimated total value in excess of £7 million could not be accounted for or used to pay the companies’ debts.
- These actions deliberately undermined the insolvency regime, and as a result, the corporate rescue firms were wound up by in the public interest by the Insolvency Service.
- A key director of one of the firms responsible for operating the scheme has been disqualified from acting as a director for a period of nine years.
- Investigations are ongoing into the directors of over sixty additional companies that appear have benefited from the firms’ misleading advice and the Insolvency Service is considering further actions against directors who utilised the scheme.

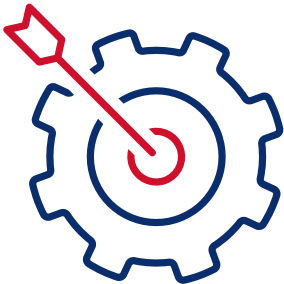


Tackling Economic Crime Facilitated through Companies

- The Insolvency Service proactively led intelligence sharing and collaborative working with Companies House and several enforcement partners to deliver significant outcomes.
- Multiple enforcement interventions and outcomes met cross-agency objectives to disrupt international misuse of corporate structures and organised crime, and uphold the integrity of the company register.
- Intelligence work originating in the Insolvency Service identified 43,000 suspicious entities on the Companies House register with strong links to South-East Asia criminal activity including money laundering, fraud, and illegal gambling.
- Our intelligence grew into a complex operation involving over 100,000 shell companies leading to asset recovery investigations worth £70 million.
- Led to a multi-agency plan, improving inter-agency co-operation and learning.
- Headline outcomes to date include:
 - 15,000 companies have been struck off the company register
 - 20,000 companies have been disseminated to the financial sector to support ongoing due diligence activity
 - Two asset recovery investigations have been launched by the National Crime Agency into assets worth approximately £70 million
 - 30 compliance actions against trust and company service providers, including 3 being wound up in the public interest by the Insolvency Service
 - Partners have agreed a blueprint response to future issues regarding company formation, which may require a multi-agency response
- Highlights the potential of early intelligence sharing and deployment of multiple powers and capabilities across agencies, and creates a pathfinder for future work to tackle international misuse of UK corporate structures.

Four Strategic Pillars

We will deliver on our three core objectives by driving improvement and change across four strategic pillars:



Our Powers and Capabilities – Target more cases involving corporate structures and serious criminality, with more flexible powers and enhanced capabilities.



Technology and Data – Utilise improved and joined systems, and exploit emerging technology to allow us to work efficiently and maximise the value of data.

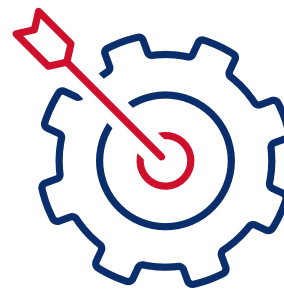


Partnerships – Collaborate closely with public and private sector partners and be deeply embedded in relevant cross-sectoral strategic and operational architecture – maximising our insolvency sector relationships as we grow into the corporate enforcement and economic crime space.



Our People – Recruit, retain and invest in a motivated, skilled, professional and adaptable workforce equipped with the tools they need to be successful.

Our Powers and Capabilities



Target more cases involving corporate structures and serious criminality, with more flexible powers and enhanced capabilities

The Insolvency Service is the primary enforcement agency for much of the Companies Act and related legislation such as the Company Directors Disqualification Act, Limited Partnerships Act, and Economic Crime (Transparency and Enforcement) Acts. We deploy civil powers vested in the Secretary of State for Business and Trade to disqualify directors, conduct investigations into live companies and where appropriate wind them up in the public interest. We pursue criminal investigations for offences contained within these Acts.

In recent years, we have developed our ability to tackle economic crime and extend our reach by investing in our anti-money laundering and proceeds of crime capabilities and growing our forensic accounting capacity.

We must continually review and enhance our powers to keep pace with fraudsters and those who would seek to engage in economic crime.

Enforcement of the Companies Act, as amended by the Economic Crime and Corporate Transparency Act (ECCTA) 2023:

- The UK boasts one of the largest and most open economies in the world, positioning it as a prime destination for global business.
- However, this openness also makes the UK vulnerable to exploitation by malicious actors, including those engaged in fraud and money laundering.
- ECCTA and associated regulations have made significant amendments to the Companies Act, giving Companies House enhanced powers and created over 110 new criminal offences.
- As agreed with Companies House, we are solely responsible for 78 of the new offences along with an additional 8 offences shared between Companies House and the Insolvency Service.
- The reforms introduced by ECCTA give us the opportunity to play a greater role in the enforcement landscape, particularly to disrupt and prevent economic crime linked to corporate activity.

We will:

- **Continue to lead civil and criminal investigations** in high-profile and nationally significant investigations, disrupting insolvency avoidance schemes, tackling malpractice in the Individual Voluntary Arrangement sector, and working with key partners to tackle phoenixism.
- **Support Companies House to target non-compliance with the company register**, including mass incorporations, complex and opaque corporate structures, and dormant company abuse, to protect the accuracy and integrity of the register and prevent crime.
- **Identify and act against directors** who breach their disqualification orders or undertakings with a renewed focus on the disruption of harmful behaviour.
- **Detect and act against individuals subject to bankruptcy restrictions** who breach their orders or undertakings.
- **Identify and take robust action** against those undermining the insolvency regime.
- **Increase our response to economic crime** by freezing and forfeiting criminal proceeds on a more wide-ranging basis.
- **Review the corporate civil enforcement regime**, including the disqualification framework and our live investigation powers, to ensure it remains effective and supports the expanding profile of our work.
- **Enhance casework prioritisation** by utilising our strategic objectives and annual strategic assessments to horizon scan, identify, prioritise and respond to key risks.
- **Review and re-shape** our annual threat assessment to ensure it captures the right data and remains fit for purpose.
- **Build our education capability** by expanding the content of our director education hub and working with key partners to inform company directors of their obligations, raising public awareness and enhancing corporate behaviour.
- **Create a suite of guidance and support** for victims and targets of crime, giving advice on crime prevention and guidance in how they can better protect themselves from scams and bad actors.
- **Promote a more active media presence** and higher profile in wider Government communications to boost awareness of our powers and sanctions to deter wrongdoing leading to improved confidence in the economy.
- **Develop our forensic accountancy provision** by appointing a new forensic accountant and complementary external commercial contract, thus providing a wider toolset to support our investigation and enforcement activities.

Technology and Data

Utilise improved and joined systems and exploit emerging technology to allow us to work efficiently and maximise the value of data



To meet the challenges of the future and direct our resources against the most harmful cases, we must use joined-up internal and cross government systems, maximising the value of data sharing and exploiting emerging technology. Criminals are using new and powerful tools, from crypto assets that enable money laundering to AI-generated audio or visuals that can defeat traditional defences against fraud. These changes also present opportunities for investigators and prosecutors in the fight against crime; technology can make it easier to review evidence, contact witnesses, and support victims.

We are investing in our new intelligence database to increase our ability to track and address UK corporate entities that are misused to commit crime. We will explore the use of AI and enhanced data analytics to improve our ability to analyse large datasets and target the most harmful offending. By identifying, targeting, and disrupting misconduct upstream of insolvency we can deliver the greatest impact on behalf of businesses and taxpayers.

We are implementing our Intelligence Roadmap to put intelligence at the heart of the business to provide structure and clarity around priorities and processes, building capability, and implementing change to maximise benefits.

We must be bolder in our use of intelligence, uncompromising in our use of the tools that we already have, and be ready to work with the Ministers accountable for our work and the government to suggest new powers or changes to the wider system that will allow us to drive cases forward swiftly and efficiently.

Intelligence Database

- The implementation of a new database is playing a crucial role in helping the Insolvency Service to develop our intelligence function.
- The database builds a detailed intelligence picture illustrating how UK corporate entities are misused to facilitate the movement of illicit funds and improved functionality is enabling improved intelligence handling and analysis.
- Key intelligence products developed by the database, such as our strategic assessment, are helping to make us a more intelligence-led agency.
- The database contains built-in processes to ensure that we are compliant with the National Intelligence Model.

We will:

- **Streamline our casework** by developing new case management systems capable of supporting increasingly complex and voluminous casework to allow the aggregation of our data and move away from disjointed legacy systems to improve efficiency, data capture, and performance monitoring leading to higher operational outputs.
- **Trial new and innovative tools and AI** to facilitate data sharing and information management to identify, collate, and evidence economic crime including upgrades to the director conduct reporting system.
- **Expand the capability** of our digital forensic services so that we are equipped to use secure methods to identify and preserve evidence held on a range of devices and networks.
- **Increase our data sharing agreements** and contribution to the wider enforcement landscape and national counter-fraud prevention efforts, including planned connectivity to the Police National Database.



Partnerships



Collaborate closely with public and private sector partners and be deeply embedded in relevant cross-sectoral strategic and operational architecture – maximising our insolvency sector relationships as we grow into the corporate enforcement and economic crime space

The Insolvency Service draws strength from our close relationships with both public and private sector partners. This collaboration is increasingly critical to our success. As we look to enact the changes introduced by ECCTA, we will work closely with Companies House and other partners to map out where our capabilities can add greatest value and how partnerships can be deepened to strengthen the wider regulatory and law enforcement ecosystem.

We are growing our intelligence resource which will enable the continual development of more insightful strategic business products such as our annual strategic assessment and control strategy. This will allow us to better assess the risks to businesses and consumers and drive effective prioritisation of our enforcement resources to deliver better outcomes and value for money for the taxpayer.

We need to deepen our use of intelligence and ensure that we contribute to the national intelligence picture so that the UK can better understand the threat posed by economic crime.

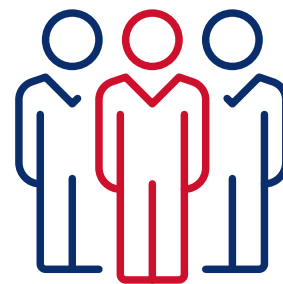
A shared ambition to deepen our existing partnership with Companies House:

- Developing new ways of working together to maximise the opportunities available through the combination of our joint powers and capabilities to tackle economic crime and prioritise threats to the integrity of the register.
- Taking a joint enforcement approach with shared priorities, and a shared understanding of how we'll use collective capabilities and mechanisms for progressing work between us.
- Building an enhanced, deep and proactive intelligence sharing partnership.
- Working collaboratively in our efforts to integrate into wider law enforcement and regulatory landscapes, to communicate and deter wrongdoing.
- Supporting the flow of work between both agencies that leads to civil and criminal enforcement outcomes.

We will:

- **Actively engage in cross-government initiatives** to tackle misconduct and economic crime and continue to integrate into the larger enforcement landscape, putting collaborative working across the public and private sectors at the heart of our work.
- **Build and deepen our relationships across the insolvency and law enforcement sectors** with a focus on important partnerships:
 - HMRC
 - working closely to identify and address the key threats of the day
 - helping HMRC tackle organised crime threats to the tax system involving corporate structures
 - deploying Companies Act offences to support HMRC's anti money laundering supervisory role over company formation agents
 - NECC
 - integrating the Insolvency Service into NECC governance at strategic and tactical levels
 - place an Insolvency Service secondee into NECC
 - place ourselves to take on new areas of casework via referrals from the NECC and others and identify areas where our capabilities can help plug enforcement gaps that accord with our three objectives
 - SFO
 - deeper intelligence partnership
 - joint approach on the education of company directors
 - The insolvency practitioner community:
 - working together to improve the quality of director conduct reports and associated enforcement action
- **Establish a more integrated relationship with Companies House** to help it cleanse the company register and operationalise the corporate transparency reforms using our unique powers to take civil and criminal action across the Companies Act where appropriate.
- **Run outreach programmes** to inform public and private sector partners of our enforcement role and capabilities, and explore opportunities for deeper collaboration.
- **Work with the devolved nations** to support and enhance their enforcement and criminal capabilities:
 - Collaboration with Companies House and Police Scotland has led to the Insolvency Service being equipped to receive case referrals
 - Collaborating with the Insolvency Service Northern Ireland and other key partners to formalise an agreement for the Insolvency Service to complete enforcement work in Northern Ireland

Our People



Recruit, retain and invest in a motivated, skilled, professional and adaptable workforce equipped with the tools they need to be successful

Finally, yet crucially, the implementation of this strategy would not be possible without the work and dedication of our people. The success of the Insolvency Service has always been built on the skills and professionalism of our people, and as the enforcement landscape changes we must change with it, to ensure that we give our people the skills, tools, flexibility, and training they need to succeed now and in the future.

We must continue to build and develop our knowledge and understanding to adapt and make use of the changing enforcement landscape. We need to find ways to build our resilience and ensure that we recruit, develop, and retain the high-calibre staff on which our strategy depends.

Focus on new cryptocurrency capabilities

- The Insolvency Service has employed its first cryptocurrency specialist.
- Cryptocurrencies are becoming more popular throughout society and industry experts estimate that around 1 in 10 people in the UK own or have owned a form of 'crypto asset'.
- Cryptocurrencies are a recoverable asset in bankruptcies, insolvent companies, and criminal investigations.
- Our expanded cryptocurrency capability will strengthen our work to monitor, consolidate and regularise intelligence flows about crypto assets leading to greater recoveries in this rapidly developing area.

We will:

- **Introduce an ambitious and comprehensive training suite** to enhance the skills of our investigators, including digital and financial, and upskill our legal professionals enabling them to confidently ensure legal compliance.
- **Provide greater development opportunities** through promoting membership of professional bodies including the Government Counter Fraud Profession, CILEX, Solicitors Regulation Authority, the Bar Council, ACCA, CIPFA, and Financial Investigator Accreditation, strengthening our reputation and impact.
- **Create new pathways into the organisation** by offering apprenticeships and direct routes into our investigation and enforcement teams, widening the pool of talent available to us, whilst promoting flexibility and career pathways.
- **Build resilience** by developing and maintaining training, and upskilling through continuous professional development.
- **Continue work to strengthen enforcement skills and interchange** including providing secondees to the NECC by plugging into their economic crime people and skills strategy, and government counter-fraud professionals.



Measuring Success

Our investigation and enforcement work provides a vital underpinning to the strength of the UK's company and insolvency legal frameworks. The work we do helps maintain trust in the UK as a safe, fair and reliable place to invest and do business. As such, our work delivers direct impacts and wider economic benefits. Over the duration of this strategy, we intend to improve how we measure our impact and assess our progress.

We will:

- **Improve our data capture** of impacts and outputs through smarter systems.
- **Develop a broader suite of outcome-focused metrics**, to calculate and demonstrate the value of enforcement economic benefits to the UK economy.
- **Focus our reporting**, enabling us to tell a clearer and more compelling story about our impact in our corporate publications, reports to Parliament and other channels.
- **Integrate our reporting** into the wider enforcement landscape. In particular, we will ensure our work relevant to tackling fraud and money laundering is fully captured within the reporting framework of the Government's Economic Crime Plan.







The Insolvency
Service

