



Ministry
of Justice

MoJ Counter Fraud Strategy

2026 - 2030

Official

MoJ Counter Fraud Strategy 2026 - 2030

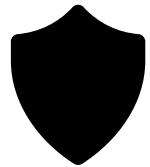
Our Mission

To develop expertise and promote awareness in fraud prevention, detection and control.



Our Vision

To ensure the MoJ and the justice system is protected as far as possible from the harms caused by fraud, bribery and corruption.



Strategic Pillars

Governance
and
Assurance

Risk
Identification

Control
Implementation

Response

Data Analytics

Culture and Capability

Enabling Behaviours



Leading with vision



Building a high-performance culture



Working collaboratively

Ministerial Foreword

Jake Richards MP –

**Parliamentary Under-Secretary
of State**



The Ministry of Justice is at the heart of the justice system, dedicated to protecting and advancing the principles that underpin a fair and just society. Our vision is ambitious yet simple: to deliver a world-class justice system that works for everyone.

We achieve this by working together, both within our organisation and in partnership with other government departments and agencies across our network of courts, prisons, probation, and victims' services. Through targeted reform, investment and modernisation, we are focused on delivering three core outcomes: punishment that works, swifter justice for victims, and a justice system that remains a beacon for the rule of law.

Yet this mission faces significant challenges. Fraud, bribery and corruption threaten to undermine the integrity of our work, whether this is through external actors seeking to exploit funds intended for vulnerable people or individuals abusing positions of trust. In a system under growing demand and pressure, every pound lost to these crimes is a pound diverted from vital public services and our collective ambition to protect and advance the justice system.

This strategy sets out how we will confront these threats with determination and resilience, working collaboratively across departments, government and the private sector. We will strengthen our controls and harness data, technology and innovation to prevent, detect and respond to fraud. In doing so, we will protect public funds, safeguard trust, and ensure that resources are directed where they matter most.

Fraud is the responsibility of each and every one of us. To fight fraud, you first have to find it, therefore I call on every colleague to play their part in ensuring this strategy is a success and to remain alert to the signs of fraud. If something does not feel right, have the confidence to speak up.

Together, we can protect the MoJ and ensure justice is delivered.

1. Executive Summary

Efficient and effective spending is vital to uphold our justice system; however, this is unfortunately endangered by the ever-present and growing threat of fraud. It is estimated by the Public Sector Fraud Authority (PSFA) that every year between £39.8bn and £58.5bn of public money is subject to fraud and error¹. Each Department alone is estimated to lose between 0.5 - 5% of its operating budget to fraud and error².

In accordance with the International Public Sector Fraud Forum's key principles, we know there will always be fraud and that the landscape of fraud is constantly changing³. Technological developments present new challenges, with more sophisticated tactics being used, alongside significant volumes of data, requiring the MoJ to adapt and change.

We will look to harness digital, data and AI in the delivery of this strategy. We will strengthen the use and quality of data to improve decision making and enable enhanced monitoring of fraud and error across the Department. We will embed detection and prevention into new services and controls by design, in collaboration with service owners.

To enable this, MoJ has designed a comprehensive and targeted five-year strategy to tackle fraud, bribery and corruption, in line with the wider Government Counter Fraud Strategy. The strategy builds on our previous three-year strategy, has been developed in collaboration with our key stakeholders and informed by an ongoing programme of fraud risk assessments and horizon scanning.

2. Strategic Risks and Opportunities

A successful counter fraud strategy is based upon effective risk identification and management. The MoJ has conducted an Enterprise Fraud Risk Assessment (EFRA), designed to assess the organisation as a whole and its greatest strategic fraud challenges. The EFRA has been conducted in collaboration with executive agencies and public bodies, to ensure full coverage and a holistic understanding of the fraud landscape.

The assessment highlighted four strategic risks⁴, deemed to be the most significant. Namely, these are: insider threat; commercial; digital and technology; and third party threat actors. Our strategic pillars and underpinning actions have been shaped by these strategic risks.

¹ Public Sector Fraud Authority, *Public Sector Fraud Authority 2024/25 Delivery Plan* (2025), pg.7.

² National Audit Office, *An Overview of the Impact of Fraud and Error on Public Funds for the New parliament 2023/24* (2024), pg. 6.

³ Public Sector Fraud Authority, *Fraud in International Aid Principles for Effective Fraud Control* (2025).

⁴ Enterprise Fraud Risk Assessment, MoJ (2024). This is in the process of being updated for 2026.

Over the next five years, opportunities exist to strengthen the role of digital, data and AI — moving from ad-hoc analysis to systematic prevention and detection embedded into services and controls. We will run structured pilots, and scale what works, including a market scan to adopt and integrate proven tools where appropriate.

Opportunities are also available for greater collaboration both internally and externally. These include sharing data and intelligence across MoJ, its executive agencies and public bodies, alongside working closely with the MoJ Risk Centre of Excellence, Data Science team and core supporting functions.

These opportunities will seek to support cross-government priorities to detect more fraud and strengthen prevention. They will be reinforced through case studies and targeted counter fraud and insider risk campaigns designed to increase awareness and act as a deterrent.

3. Strategic Pillars

To achieve delivery of our vision, four core focus areas have been identified as strategic pillars and two as supporting pillars, as demonstrated on page 2. The pillars, in conjunction with our strategic risks, will provide direction over the next five years, with future action plans and priorities evaluated against these.

The pillars have been selected by assessing the current baseline of performance across the MoJ, in order to identify areas requiring the greatest focus and investment. These include strengthening compliance against functional standards, embedding prevention into design and increasing the detection of fraud.

Although the core pillars will be pivotal in our counter fraud response, it is acknowledged that these will not be possible without a resilient, forward-thinking and fraud conscious culture. We have therefore identified two supporting pillars, which are strong Culture and Capability and adopting a data driven approach via the use of Data Analytics.

By focusing on our people, to drive a pro-active, fraud-conscious culture, we will ensure all levels of the MoJ are bought into our vision of protecting the organisation from fraud, bribery and corruption as far as possible.

At the heart of our approach is also a commitment to adapt and evolve with the changing face of fraud, by utilising data analytics to generate insight and tackle fraud. MoJ's ambition is to transform from its current more fragmentary position to a function which is data-rich and evidence based.

Key Actions: Strategic Pillars

Governance and Assurance

- ✓ Ensure full compliance with Functional Standards
- ✓ Promote strong counter fraud leadership
- ✓ Produce data-rich dashboards to enhance decision making
- ✓ Establish Senior Civil Service (SCS) champions
- ✓ Expand reach at key forums cross-government

Risk Identification

- ✓ Annual refresh of EFRA with Executive Agencies and ALBs
- ✓ Horizon scanning, including of emerging cyber and AI fraud methods
- ✓ Thematic FRAs for core functions
- ✓ Detailed FRAs in place for all major projects and programmes
- ✓ Share good practice cross-government
- ✓ Accountable risk owners and actions

Control Implementation

- ✓ Annually update and publicise policy and response plan
- ✓ Train individuals in fraud loss measurement
- ✓ Create control library by 2028
- ✓ Share case studies internally
- ✓ Keyholder business case reviews
- ✓ Create fraud prevention checklists
- ✓ Targeted PSFA approved action plan
- ✓ Collaborate on vetting protocols

Response

- ✓ Improve information gathering and data sharing cross MoJ
- ✓ Access to right investigative capabilities
- ✓ Collaborate cross-government
- ✓ Evaluate incident, lessons learned and escalation processes
- ✓ Create response playbook
- ✓ Collaborate with Executive Agencies on key risk areas

Supporting Pillars

Culture and Capability

- ✓ Effective, multi-channel comms campaign
- ✓ Compliance with mandatory training
- ✓ SCS and HQ team Government Counter Fraud Profession members
- ✓ Reframe finding of fraud as positive
- ✓ Increase reporting of fraud and error
- ✓ Cross-MoJ Sharepoint site created
- ✓ Run capability surveys
- ✓ Targeted data literacy training

Data Analytics

- ✓ Test, pilot, scale approach for analytics and AI detection tools
- ✓ Improve data sharing
- ✓ Collaborate with AI, digital and data colleagues on emerging risks
- ✓ Raise awareness of controls being embedded by design
- ✓ Create performance dashboard
- ✓ Data framework policy created
- ✓ Share lessons learned cross-gov