



Government  
Counter Fraud  
Profession

The Public Sector  
Counter Fraud Journal

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**5<sup>th</sup>**

**Anniversary**

**Celebrating the Profession's  
first 5 Years**

# Editorial Board



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# Editor's letter



As one of the newer members of the editorial board I was honoured when asked to introduce the five-year anniversary issue of the Public Sector Counter Fraud Journal. So, I write this editorial letter with trepidation.

Before I go on to talk about the current issue of the Journal, the editorial board was saddened to learn of the passing a fellow editorial board member David Kirk. David was an unwavering supporter of the Government Counter Fraud Profession (GCFP) and the Public Sector Fraud Authority (PSFA) and leaves behind an enduring legacy. I'm sure you will join me in sending our condolences to his friends and family at this sad time. The next issue of the journal will include an article in honour of David's memory.

I have always been a firm believer in lifelong learning, I still believe there is more to learn. So, it is good to see this is reflected throughout this bumper issue.

Bringing together expertise has helped the counter fraud community to understand that we all face the same problem and by sharing best practice we can effectively counter fraud. We saw the benefits of this at the recent International Public Sector Fraud Forum (IPSFF) London Summit in September. It is heartening to see this being replicated through the GCFP Annual conference, where practitioners have the opportunity to discuss how they can collectively tackle fraud in the public sector. As we move through the journal we have an insightful article from Alex Rothwell from the NHS Counter Fraud Authority. He reflects on his own learning journey during the Counter

Fraud Leaders Programme pilot. Whilst Mike Bett, introduces the reimagined Civil Service Learning Fraud Awareness Course, which will be available for all civil servants across government.

The Counter Fraud Investigators Apprenticeship is thriving as the Department for Work and Pension (DWP) celebrates its 100th learner milestone.

We also have a really interesting insight into fraud from a behavioural perspective. Taking a deep dive into how fraudsters use their powers of manipulation to coerce victims to part with their money... particularly capitalising on economic downturns. As we continue to focus on prevention across the public and private sectors, understanding behaviour of both the fraudsters and their victims may unlock untapped opportunities to support our customers through awareness, education, or technological improvements like use of Artificial Intelligence (AI). Speaking of powers of manipulation, there is an academic article on The Fraud Triangle and Corporate Psychopaths. I found this deeply interesting looking into the mindset of a "Corporate Psychopath".

I have enjoyed reading the thought-provoking articles in this edition, and I am sure you too will be inspired to continue your own learning journey just as I have.

If you think you have got something that would be interesting or you would like to read about yourself for our wide range of readers, please get in touch and email [gcfp@cabinetoffice.gov.uk](mailto:gcfp@cabinetoffice.gov.uk).

Shawn Turner,  
CFCD Delivery Hub Leader,  
National Delivery Assurance Service,  
Department for Work and Pensions

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# Foreword

Mark Cheeseman OBE

Chief Executive Officer, Public Sector Fraud Authority



## Working Across Borders to Understand and Combat Fraud

At the beginning of September 2023, for the first time since the Pandemic, we welcomed fraud experts from across our Five Eyes partners to London to spend an intense week sharing our approaches on understanding and taking action on fraud against the public sector. They are all members of the International Public Sector Fraud Forum, a group that was created in 2018.

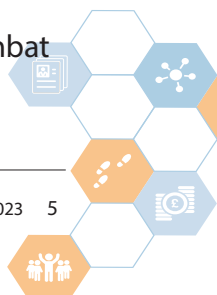
The history of the Five Eyes, which brings together Australia, Canada, New Zealand, the United Kingdom and the United States, has its origins in the Second World War. Whilst it started with its focus in Intelligence, the links between our countries are strong in many areas and taking action on fraud against the Public Sector, through the International Public Sector Fraud Forum (IPSFF), is one of those areas.

Since it was created, the IPSFF has developed and published a number of leading practice guides<sup>1</sup>.

- Fraud Control Testing Framework FCTF-01
- Fraud in International Aid: Principles for Effective Fraud Control
- A Guide to Pressure testing
- International Public Sector Fraud Forum: A guide to managing fraud for public bodies
- Fraud in emergency management and recovery: principles for effective fraud control
- Guide to designing counter fraud and corruption awareness training for public bodies
- Guide to understanding the total impact of fraud
- The use of artificial intelligence to combat public Sector fraud

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1 <https://www.gov.uk/government/publications/international-public-sector-fraud-forum-guidance>



These guides have helped public bodies shape their action, and increase their ambition on fraud against the public sector.

From the IPSFF's principles in the 'Guide for Managing Fraud' being a feature of counter fraud strategies and approaches to the 'Fraud in Emergency Management' guidance forming the structure of public bodies fraud responses in the pandemic, the growing lake of practice is an invaluable source for fraud experts.



These leading practice guides have come from the hours that the Forum has spent together, some of it face to face, but much of it virtual.

The Forum was committed that the fruits of their discussions should not just be to enhance and empower those who were part of the sessions, but also to share them more widely and openly.

At the Forum's Summit in London, there were a variety of sessions including updates from each country on their challenges and progress. The main sessions were deep dives into the measurement of fraud, the measurement of prevention, the use of data and analytics to find and prevent fraud, the use of intelligence to drive activity, the interface and interrelationship between economic and cyber crime and fraud risk management approaches.

With its focus on sharing practice more widely, the centrepiece was a discussion on the latest leading guidance that had been developed between the partners - The Fraud Control Testing Framework.

This Framework sits firmly in the 'Understanding the Problem' part of our challenge. It helps an organisation to better understand their exposure to fraud risk, and to understand the vulnerabilities in the controls that they operate to protect themselves. We have to accept that our controls will have vulnerabilities and our adversary is skilled and practised in finding and exploiting them.

By using control testing to explore the vulnerabilities in our controls, we can get ahead of the fraudsters who attack our systems. We can also use it to improve confidence in our controls.



By using control testing to explore the vulnerabilities in our controls, we can get ahead of the fraudsters who attack our systems. We can also use it to improve confidence in our controls.

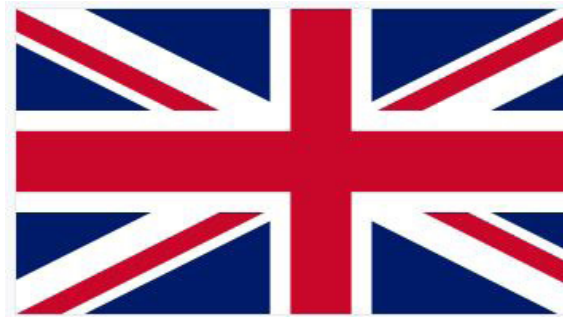
Fraudsters are agile, and fraud is a quickly evolving challenge. The controls we rely on today may not be effective in the future. This new guidance gives fraud experts quick access to leading practice from experts in the Forum to explore their controls, better understand them and make sure the vulnerabilities are limited and understood.

When we met at the Summit, the members of the Forum discussed and agreed five new

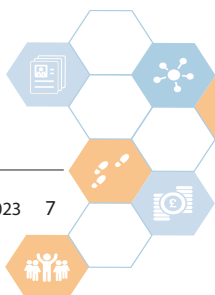
workstreams to take away and work collectively on over the next year - each one led by a partner country. These are:

- Fraud and risk
- Countering criminal enterprises
- Evidence and insights
- Countering fraud in international aid
- Counter fraud data and analytics

The IPSFF will continue to work together to share leading practice, and to make this available to the wider fraud fighting community. Collaboration with others who are fighting fraud should be integral to how we work. This will help us all to better understand and reduce the impact of fraud.



**International Public Sector Fraud Forum**  
*Bringing countries together to fight public sector fraud*



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# The International Public Sector Fraud Forum London Summit 2023

## The International Public Sector Fraud Forum London Summit 2023

Following a hiatus of in-person meetings due to the pandemic, 2023 presented an exciting opportunity to convene International Public Sector Fraud Forum (IPSFF) members together once more. We were keen to provide opportunities for members to come together to build relationships, discuss counter fraud challenges and share knowledge and best practice.

We proposed holding a summit in London and were delighted to be able to invite members to a week-long event between 11-15 September. Organising an international summit is no mean feat, but a core team from the PSFA was able to overcome the challenges of this to develop an interesting and varied programme of events. The key themes of the summit were agreed by IPSFF members to be fraud prevention, understanding risk, building capability and the use of data and innovation to fight fraud. We wanted to provide opportunities for each country to showcase their work in each area. Representatives from the PSFA, HMRC, the Department for Work and Pensions, the Department for Business and Trade, the Home Office and the National Audit Office made up the UK delegation.

The summit began in the historic Churchill Room in HM Treasury.



It was opened by Mark Cheeseman, CEO of the PSFA, who reflected on the progress and achievements of the IPSFF since its launch in 2018.

Over five days, we heard presentations from all countries covering a wide range of topics. This included the use of red teaming and war gaming to identify fraud risks, the impact of fraud on indigenous communities and developing approaches to effectively measure fraud prevention. It provided many interesting opportunities for delegates to properly discuss counter fraud topics, developing insight and highlighting further opportunities for working together. Whilst countries were responding to the fraud challenge in different ways, it was clear that there was much that could be learnt and there was a real energy in the room as delegates reflected on how these insights could be used in their own parts of government.

Whilst the number of delegates was limited, we were keen to provide an opportunity for the Summit to engage with a wider array of UK counter fraud professionals. On the fourth day, we welcomed 50 additional attendees from the Cross-Government Fraud Champions Network to hear about the different approaches to tackle fraud in the public sector being taken by members. There was also a keynote address from Baroness Neville-Rolfe, Minister in the Cabinet Office, who reiterated the importance of working together to support the counter fraud response. This was a really successful part of the week with both Champions and delegates being highly enthused about the opportunity.





During the summit we were delighted to host a Civil Service Intern, Grace, to support in the planning and delivery. Grace had this to say about the experience:

“Attending the IPSFF Summit was an invaluable and unforgettable experience. It felt extremely rewarding to be able to see our months of planning come into fruition and to listen to high profile counter-fraud experts from around the world. Hearing the range of experiences from different governments following was truly fascinating and I found it remarkable to see the sheer breadth that fraud against the public sector covers. With the topics that were raised ranging from the use of gaming to the effects of fraud in indigenous communities, the IPSFF Summit created an indisputably captivating environment for fruitful discussion.”

This sentiment was very much echoed by the delegates themselves.

As we reflected at the end of a long but interesting week, it was clear that all the member states are trying to deal with the same challenges. No single government can tackle this challenge in isolation as fraud is a complex and evolving issue. It requires the power of international cooperation through pooling our collective knowledge, expertise, experiences and resources.

By learning from one another, through the International Public Sector Fraud Forum, we have enhanced our fraud prevention mechanisms,

bolstered our investigative techniques, and remained alert to the ever-evolving tactics used by fraudsters. It is also by learning from the successes and failures of our global counterparts, that we have enhanced our own strategies and frameworks for fraud prevention, detection, and prosecution. The Summit was a great opportunity to strengthen collaboration and to learn from each other. It was clear that being able to discuss the knotty challenges and to learn about different approaches has helped members to develop their own insights and fraud responses.

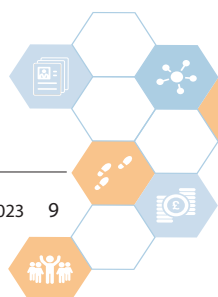
The Summit provided a great opportunity to develop and drive forward our plans for the IPSFF. It has already published new technical guidance on fraud control testing. The IPSFF will continue to explore new areas to develop guidance on, reconfirming the commitment to share best practice and to work collaboratively across borders. It is also setting up a number of sub-groups, with wider membership, covering:

- Fraud and risk
- Countering criminal enterprises
- Evidence and insights
- Countering fraud in international aid
- Counter fraud data and analytics

The IPSFF has achieved great work already and we are excited to be able to capitalise on the energy from the Summit to continue to collaboratively work across borders to develop and support the counter fraud response.



Author:  
Jack Victor,  
Head of Fraud Policy,  
Public Sector Fraud Authority



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# Counter Fraud Leadership Programme: Education as a Life Long Learning

They say there is no end to education as life is one long learning process.

A principle I wholeheartedly endorse. Since leaving a lifelong career in law enforcement in November 2021, I have been thoroughly energised by taking on a new role as Chief Executive Officer of the NHS Counter Fraud Authority. This challenge has brought with it an opportunity to learn how a new (to me anyway) organisation operates and about its funding structures, leadership and service delivery.

That knowledge is important to me. As a counter-fraud leader, one of my core responsibilities is to ensure that fraud is managed effectively in a Government funded-organisation. That means I need to influence from within and, as a former police hostage and crisis negotiator, I know that you cannot influence behaviour or decision-making unless you have built a foundation of trust and credibility. Part of building that credibility in my role is demonstrating an understanding of how the organisation works and being able to articulate the benefits of improving the fraud response within that context, but why should people believe me?

We know that historically the extent of fraud risk has not been recognised, but thankfully there is a growing movement led by the Government Counter Fraud Profession which aims to rectify that. With more than 7,000 members, the Profession has led the way in developing strong capability, but until now leadership has not formed part of the curriculum. Rightly so, we have focused on professional expertise at practitioner level, but that's all about to change.

Leadership will now form part of the professional certification managed by the profession. Myself and five other senior fraud leaders in Government were fortunate to be part of a pilot programme which culminated in us receiving a Certificate in Counter Fraud Leadership and membership of the Government Counter Fraud Profession as a Certified Counter Fraud Leader.

Author:  
Alex Rothwell, Chief  
Executive Office, NHS  
Counter Fraud Authority



A proud moment for all of us and an important step forward in recognising fraud management as a core expertise.

The programme itself is a partnership between the Profession and Coventry University bringing academic expertise, rigour and technology to the learning journey. The structure was broken down into three units delivered on the University's Future Learn digital platform (which also provides access to an online library of learning material). Each unit comprised four study weeks accessible

from the platform, with students encouraged to complete a non-compulsory reflective diary as the course progressed, and an option to comment during learning on each topic via a forum. Although I knew all of my fellow students through existing connections, we all welcomed the opportunity to take part in a facilitated online workshop during each unit.

The learning objectives were:

- The impact of fraud, relevant legislation and the skills required to lead a Counter-Fraud Function.
- Business ethics, change management and strategic risk management in a Counter-Fraud environment.
- Responsibilities and day-to-day activities involved in leading a Counter-Fraud Function.

On accessing the platform, I was immediately impressed with the variety of learning materials. The production team, led by Laura Eshelby and Mike Betts, has certainly assembled a star-studded cast of contributors (well at least star-studded in terms of the fraud profession) and, referring back to my points about credibility, there were also contributions from some of my colleagues at the NHS Counter Fraud Authority. The remainder of the material described in a clear and concise fashion what we needed to know with consistent references to academic learning and knowledge along with guidance on how to conduct further research into areas of interest.



When each unit concluded, we were required to complete a 1500 word essay describing the areas we found useful in the context of our work, how those areas impacted specifically on our organisation and how we would implement changes based on an evaluation of the learning. The marking rubric included a small percentage of extra marks allocated for appropriate referencing and presentation. On submission the essay was marked on a pass/fail basis.

It's fair to say that I have learnt almost everything I know about fraud 'on the job'. I'm an avid learner in that setting and enjoy reflecting on learning at work, but it was extremely valuable to have the theory of fraud management presented in a structured, academic framework. Researching the evidence base for this work was reassuring to ensure that our approach was in line with current theories. On a number of occasions, I have referred back to the learning material to strengthen a business case, help with our strategy development or to just provide an explanation of why something should be done.

It wasn't easy taking on this additional work. I have the utmost admiration for those of you who are undertaking learning at work whilst still holding down your day job. Like many of my colleagues, whilst managing fraud risk is our core purpose, we also have responsibility for managing departments (or in my case an arm's length body) which brings with it the full range of responsibilities from budget management to procurement.

Setting aside the time to undertake four to six hours of study a week (it actually turned out to require more to do the learning justice) doesn't sound too onerous, but on top of a demanding workload, which already required prioritisation, we all found it difficult. During the first period, in particular, the Department of Health was undergoing an internal departmental review of ALB's, which created a lot of extra work. I would like to thank Laura and Mike, in particular, for being so patient with us. Undertaking study in addition to a demanding 'day job' proved time consuming, but the tutors were flexible with respect to academic deadlines with sufficient extenuating circumstances.

I struggled initially to realise the benefit of academic evidential learning beyond that of lived experience, yet soon learnt that it was beneficial to utilise both to broaden my understanding of situations I regularly deal with. I speak frequently at conferences and events on the subject of fraud and I remember when I first took on a leadership role a colleague telling me 'it's important to have an opinion as a leader'. My opinions are more the product of my own experiences and so it was hard at times to resist the urge to effectively quote myself or others that I know in this field. I hope this doesn't come across as arrogant. The truth is that we can influence most effectively when we have a sound base of academic knowledge and marry that to our own understanding of the world in which we operate. All of us are leaders in the counter-fraud environment and our opinion counts.



A final written essay was required to consolidate the learning, which would form the basis of a presentation to be made at an immersive 'residential'. Throughout the programme the learning was anchored to a fictional scenario involving a Government Department with high fraud risks and a fraud function that was not fully developed. The essay task was to create a new strategy for an improved counter-fraud function and to consider the investment required to achieve that. Sounds like a scenario we are familiar with? Absolutely. Thankfully we had only just finished a very similar assignment for real in my own area of business and so I leant heavily on our workplace-based learning in that space.

After successfully passing the written element of the course, we assembled for a week at Cranfield Management Development Centre. Nestled in the Northamptonshire countryside it's an unprepossessing site, but once on campus we found an excellent facility. Mark Cheeseman, and his team, had assembled a superb cast of knowledgeable fraud experts to guide us through an intensive week of learning and exercises.

It would be easy to feel self-conscious practising giving evidence at a Public Accounts Committee Hearing or explaining to a Permanent Secretary that the Department's flagship grants programme is being defrauded, but I have learnt many times over that the more you practice, the better you get.

The phrase 'train hard – play easy' is all about allowing us to fall back on those demanding experiences when we face such scenarios in real life. Thankfully, we all passed the test. I was particularly glad as Laura had kindly told the entire audience at our national NHS Counter Fraud Conference in May that I was undertaking the course and they should ask me whether I passed or not later in the year. No pressure then!

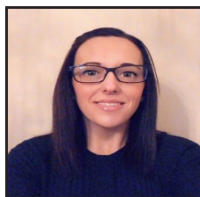
And so.....our first cohort is now the proud holders of the first ever Government Counter Profession Leadership Certificate. To quote Neil Green, my colleague, we expect this training to be a "cornerstone for nurturing future counter fraud leaders". Thank you to everyone who participated in making it happen. I feel better equipped to promote the work that every reader of this journal lives and breathes on a daily basis and, as more of you undertake this learning, it will only strengthen the status of the profession. In the meantime, our cohort now has the opportunity to progress to further certification by demonstrating the application of knowledge in our working environment. As I said...there is no end to education.



# The birth of the Enhanced Checking Service

The Enhanced Checking Service (ECS) was an entirely new national team established within DWP's Counter Fraud Compliance and Debt Directorate (CFCD) during the Covid pandemic. It was designed to prevent fraudulent claims and safeguard the taxpayer from the burden presented by economic crime during a time where paying benefits to support the UK was priority.

Author:  
Christine Hughes and  
Kelly Murphy (Image),  
Senior Leads, Enhanced  
Review Team



The ECS team's role was to look at additional evidence on suspicious benefit claims prior to first payments being made. These enhanced checks looked to challenge elements such as a customer's identity, the details provided about alleged children, housing costs and so on.

ECS was only meant to be a temporary measure to enable the DWP to respond to huge influxes in claims resulting from the pandemic. However, it was so successful as a concept and in preventing fraud and error for the department that it continues to operate and has now expanded to be one of the largest national functions in CFCD.

Its continuing success is down to the way it is built to prevent fraud at the earliest opportunity and where possible before a payment is made. This plays into our departmental shift to a prevent agenda, stopping fraud from the outset, providing a robust intervention service protecting the public purse from loss and preventing our customers falling into large overpayments. This approach also provides a key service to our customers, educating them on their responsibilities to also drive down error, taking a more holistic approach to customer interactions in fraud.

Deploying this new service into the DWP at pace needed a culture change across the department. Processes and training had to be developed rapidly in partnership with stakeholders across the DWP benefit areas in an environment where there was a great

weight of expectation for the team to prove itself quickly and prevent fraudulent claims; remembering that the DWP priority was ensuring customers who were entitled to receive assistance were paid in a timely manner.

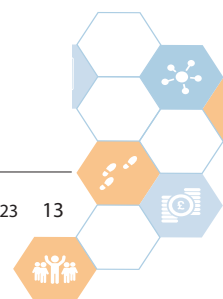
## Quotes from our operational team members:

"I have worked on various work streams within ECS, these were all varied and valuable streams of work that provided very good results. Staff within regions have a real engagement with these campaigns as they conduct full claim reviews and they knew that they were developing a good range of personal and investigative skills, whilst tackling fraud within the system, but also helping genuinely vulnerable customers within our campaigns."

"I have enjoyed leading in these campaigns as a subject matter expert and it has given me many valuable learning points and pushing me to always be flexible and learn new areas of work at pace and deliver upskilling to our staff ensuring they have the skills to carry out the campaigns. I really enjoy the work as it is varied and provides a sense of accomplishment to your day." (Ryan Finnegan)

## Enhanced Review Team

*Preventing & Detecting*



**“Challenges:** The ingenuity of the organised crime groups we dealt with and their ability to change approach with a new angle meant we had to constantly adapt our own approach to try and counter. A constant game of cat and mouse! We also had our frustration as at times when we spoke directly to them, their brazen and carefree attitude was clear... one comment I remember was “congratulations, we know you’ve been set up to stop us!” which actually motivated us even more.

**The positives:** Developing a route to having digitally uploaded identification (ID) documents verified by our colleagues in the Document Examination Team, quickly achieving a significant minority of documents being identified as suspect. Working with colleagues across the country who had it not been for ECS I would never have spoken to being able to utilise the vast amount of experience we have as a Department, and hopefully with my experience helping others. The fact that everybody worked as a team, and you could call anyone, and they’d help you (not universally the case in normal times). Also, the opportunity to speak with parts of the department that in “normal” times I would never deal with such as Advanced Customer Support Lead’s when we dealt with vulnerable claimants, definitely not a case of silo working. The whole period was stressful, manic at times, and bewildering with the changes that had to be implemented at short notice,

but ultimately hugely rewarding due to the successes we all achieved and continue to achieve (Aidan)”

“Having been in CFCD since 2001, I landed in ECS during the Covid 19 pandemic as my husband was extremely clinically vulnerable. I had been involved in different parts of CFCD (investigations, administration, surveillance) but this was the first time I was actively involved in developing processes to counteract the active attack on the welfare system to syphon funds from the needy to the greedy. I feel privileged and proud to work with colleagues throughout the country, who prior to this, I would never have had cause to work with as they did not sit in my region. It has been fascinating to develop a process with other parts of CFCD that previously I would have had no need to interact with and to have my opinion listened to and valued (Sally)”

“ECS campaigns dealing with abroad fraud gives me great job satisfaction knowing that we are preventing and detecting fraud whilst also correcting claimant’s payments of universal credit. By preventing these claims from going into payment ensures that we are protecting the public purse and not allowing any incorrect payments being received by the customer. Liaising with stakeholders internally and externally is a key part of my role so I can provide the agents with the correct guidance and instructions to carry out their review of the claim.”



# Enhanced Review Team

*Preventing & Detecting*

# Counter Fraud, Bribery and Corruption - How we are raising awareness

**'Fraud is bad, you are our heroes, let's find and fight fraud together.'**

This is the key message woven throughout a brand-new Civil Service free online fraud awareness course. This article describes how the course was designed, the challenges faced, and lessons learnt during its eight-month development.

Author:  
Michael Betts PSFA  
Head of Capability and Learning, Public Sector Counter Fraud Authority



Developing a fraud awareness training course is complex. In a large organisation like the civil service, there are many different drivers and a range of different stakeholders and consumers.

As a starting point, it was essential that the course was linked to wider fraud prevention approaches and strategies across the civil service.

Counter Fraud, Bribery and Corruption is one of the big four training course topics across the Civil Service with approximately 160,000 civil servants completing this course every year. The refresh of the course was an excellent opportunity to highlight the true harm, risk and threat that bribery, fraud and corruption pose to the public sector and those working within that environment and align the messaging to that of the PSFA which echoes that of the International Public Sector Fraud Forums five principles<sup>1</sup>, namely:

- Principle 1 - There is always going to be fraud;
- Principle 2 - Finding fraud is a good thing;
- Principle 3 - There is no one solution;
- Principle 4 - Fraud and corruption are ever changing;
- Principle 5 - Prevention is the most effective way to address fraud and corruption.

As well as aligning the course narrative with current key messages on fraud, it was important to ensure the course content was also engaging, relevant and accessible. By increasing the levels of awareness, it was also an opportunity to help defend the public sector, its people and resources, from fraud and protect taxpayers' money and those most vulnerable in society. The most important defence against fraud in an organisation is its people.

To co-ordinate the fraud related aspects of the project, the PSFA was appointed the 'technical sponsor.' For the course to be effective at helping prevent counter fraud, it needs to be an integral part of wider reduction plan activity across the public sector. In the course design, importance was placed on identifying which part of the population was most at risk and where there may be higher levels of fraud risk. This included identifying the potential threats posed by a range of fraudsters, both internal and external. Once this was understood, illustrative case studies were written. These case studies helped to bring the different types of fraud to life, helping those undertaking the course to understand the different faces of fraud.

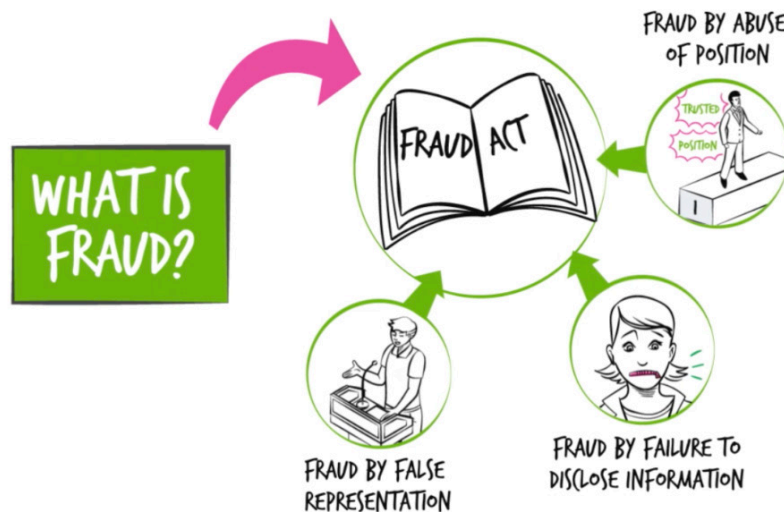
YOU ARE OUR HEROES

YOU'RE AN IMPORTANT LINE OF DEFENCE



1 International Public Sector Fraud Forum A Guide to Managing Fraud for Public Bodies. (2019). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1115931/GuideToManagingFraudForPublicBodies.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1115931/GuideToManagingFraudForPublicBodies.pdf). (Accessed 26/09/23)





Much of the approach for developing the course was taken from the Guide to Designing Counter Fraud and Corruption Awareness Training for Public Bodies<sup>1</sup>, published by the International Public Sector Fraud Forum.

The Forum includes representatives from organisations based in Australia, Canada, New Zealand, the United Kingdom and the United States. The Guide describes six golden rules when designing fraud awareness training, namely:

1. Educating them [employees] about why integrity, ethics and compliance are important to the organisation and to them;
2. Providing definitions and explaining the types of fraud and corruption they may encounter within their organisation;
3. Raising awareness of the organisation's fraud policy and the consequences associated with its violation;
4. Explaining to them how uncovering fraud is good for the organisation and the public sector as a whole;
5. Making them aware of the behavioural red flags of fraudsters and the controls in place to prevent, detect, deter and address fraud and corruption informing them about the consequences and impacts of fraud and corruption on the public sector, public servants, targeted victims, and the public at large; and
6. Providing the processes, mechanisms and tools to report and respond to fraud and corruption.

The design team assembled for the project was multi-skilled, consisting of Government Skills and Curriculum Unit (GSCU) Learning & Development design specialists, and the Public Sector Fraud

Authority (PSFA), who were supported by a group of Subject Matter Experts (SMEs). These included representatives from the Government Internal Audit Agency, UK Export Finance, Department for Environment, Food and Rural Affairs, the Australian Government and the NHS Counter Fraud Authority. This cross civil service team worked with an external online learning supplier. The goal was to develop a new narrative to fight fraud, which was innovating in its delivery. This ambition presented a series of challenges that no doubt are faced by other organisations; being transformational rather than transactional requires energy, enthusiasm and expert skill.

While it was the counter fraud expert who led the technical content, the design of the learning was led by learning experts, as any learning product should be.

Importantly at the commencement of the project, the course learning outcomes were agreed. These outlined what people would learn from the course. They also acted as the bedrock to ensure that the course content (as it was developed) delivered its learning objectives:

- Explain the crime of fraud and associated offending, its impact and why fraud must be prevented;
- Identify the most prevalent types of fraud abuse against government;
- List the indicators of possible fraudulent crime and corrupt activity;
- Outline what their individual role and responsibility is in preventing and finding fraud abuse, bribery and corruption;
- Describe how to report a suspected act of fraud, bribery or corruption.

<sup>1</sup> Commonwealth Fraud Prevention Centre. (2022). Guide to Designing Counter Fraud and Corruption Awareness Training for Public Bodies. [online] Available at: <https://www.counterfraud.gov.au/library/guide-designing-counter-fraud-and-corruption-awareness-training-public-bodies> [Accessed 26 Sep. 2023].

A range of methods was used in the course to cater for different learning styles. They included: animation, video newsreels to bring case study material to life and assessments to test understanding and learning.

The process of developing the course was highly collaborative. It involved undertaking a gap analysis of the existing provision of counter fraud training, identifying the core counter fraud message and allocating the available resources for the design of the new course. During this process we engaged with Christopher McDermott, a leading SME from the Australian Attorney General's office. We embedded best practices including the use of fraud personas<sup>1</sup>, a product of the Commonwealth Fraud Prevention Centre. These fraud personas are a highly effective way of visualising the various threats that fraudsters represent and were placed at the heart of the new training course. The course designers employed a storyboard to capture the range of learning designs including animation, video and case studies. This ensured that the course flowed and had a beginning, middle and end.

The development of the course is an excellent example of subject matter experts and learning and development specialists<sup>2</sup> collaborating and sharing their expertise to develop a product relevant to the public sector. There were regular meetings, discussions and reviews of the course design as it progressed.

One of the most significant decisions involved separating the topics of fraud from those of bribery and corruption to form two sections.

This was important as the two offence types have unique and distinct features. Fraud in the training course is defined using the Fraud Act 2006 as this gives a clear definition which is accessible to all.

The bribery and corruption module focuses on the offence of bribery through the more recent definition of corruption from colleagues in the Joint Anti-Corruption Unit in the Home Office.

Significant focus on the use of language ensured linguistic meaning was considered throughout. For example words like 'scam' and 'scammers' were avoided throughout the course.

Our ten key lessons in designing organisational fraud awareness training are:

1. Gather an omnicompetent design team with a range of skills including learning design professionals, subject matter experts and organisational stakeholders;
2. Ensure the appropriate (significant) time and resources are devoted to the project;
3. Understand the need for potential compromise in the duration of the awareness training and breadth of the topics to be covered;
4. Establish the key organisational messages;
5. Develop and agree the learning outcomes;
6. Map the course content to the agreed outcomes;
7. Assess participant comprehension against the desired outcomes;
8. Innovate in the development/delivery of the course;
9. Choose the language, graphics and branding with thought and care;
10. Message that fraud and related offending is a threat to both organisations and individuals, causing significant harm and loss to its victims.

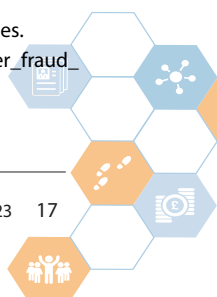
Communication, coordination and collaboration are key ingredients in the success of the course's development.

We want our community to be the informed superheroes on the front line. Effectively fighting bribery, fraud and corruption safeguarding themselves and the organisation; in this new course, we believe we have moved closer to this outcome.



1 Commonwealth Fraud Prevention Centre. (2021). Fraudster Personas and Common Countermeasures – Introductory Guide. [online] Available at: <https://www.counterfraud.gov.au/library/fraudster-personas-and-common-countermeasures-introductory-guide> [Accessed 26 Sep. 2023].

2 International Public Sector Fraud Forum Guide to Designing Counter Fraud and Corruption Awareness Training for Public Bodies. (2020). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/864839/Counter\\_fraud\\_and\\_corruption\\_11.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/864839/Counter_fraud_and_corruption_11.pdf). Accessed 19 September 2023



## Spotlight on Apprentices

This month we catch up with our very own Peter Caddick, a Business Development Specialist in the National Fraud Initiative Team, which is part of the Data and Intelligence Services in the Public Sector Fraud Authority.

After a 30 year career in the telecoms industry sales as an account manager, I decided to take early retirement in 2018. This was two years before my state pension age and meant that I needed to register myself as unemployed in order to qualify for credits of National Insurance contributions until reaching the state pension age two years later.

I visited my local JobCentre Plus to register and was interviewed by Ami, a new Job Coach. Ami recorded all of my details and during our discussion, she asked if I would be interested in doing any temporary work for the Department of Work and Pensions (DWP) in a large service centre close to my home. It sounded like a good use of my time and skill set, so I decided to apply.

After training, the job involved speaking by telephone to claimants of Employment and Support Allowance to remind them of their duty to notify DWP of any changes in their circumstances.

I found it fascinating to speak to claimants about their personal circumstances and discovered I had a talent for explaining to claimants, vague obscurities of Employment and Support Allowance. As I learned more about the benefit system, I became engrossed by the various frauds and errors I discovered in the course of my conversations with claimants. I was asked to perform more detailed and complex tasks and after a few weeks I was asked by our Grade 7, if I would like to join DWP on a permanent basis as an Intervention Officer.

As a young man, I was not very academic and left school aged 16 without qualifications, unlike my friends who went on to study at university. I have always regretted my lack of academic qualifications and have privately felt ashamed of myself. As a condition of my joining DWP was that I undertook and successfully completed a level three apprenticeship in Operational Delivery. This seemed to me like a chance to redeem

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my previous lack of academic achievement and I jumped at the opportunity to challenge and prove my capabilities to myself. There were 18 apprentices in my cohort and DWP allowed us a whole day per week to undertake our apprenticeship work, which I found was ample time.

At 64 years of age, I was the oldest apprentice on the scheme and launched into my challenge with enthusiasm and energy. I engaged with my Learning and Development Coach at every opportunity and found that the

worldliness I had acquired over my career allowed me to understand and interpret the assignments and tasks I was set easily and quickly. I was able to submit all of my modules and assignments early and felt confident that my submissions were accurate and correct. I felt so comfortable that I was asked to act as a 'point of contact' for our learning provider to ensure that instructions and messages were delivered to all apprentices correctly and at the right time. This developed into my helping other apprentices to interpret assignments and understand the requirements of the various modules we were required to complete.

However, not everything went as planned. I felt that my maths functional skills were weak, so I asked an external tutor to help me grasp the rudiments of this test and practice the formulae techniques and understanding that I was acquiring. This resulted in a pass at the first attempt.

I had no such concerns about my English functional skills, (having been an amateur student of English language for years). Imagine my shock when the results of this test were 'failed', (because I had not read the examination rules correctly!) A big dose of humility and a re-test later and I was able to progress my apprenticeship.

I eagerly awaited my endpoint assessment and was proud and delighted when eventually awarded my 'Pass' certificate. As soon as my permanent employment status was confirmed, I was given special duties in the Counter Fraud

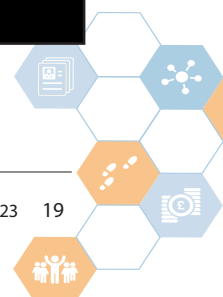
Compliance and Debt within DWP and a year later was promoted to Executive Officer in a special project team. After three years at DWP, I applied for promotion to Cabinet Office as a Higher Executive Officer within the National Fraud Initiative.

As a result of my apprenticeship, I have now been able to develop another career in the Civil Service and look forward to delivering outcomes for tax payers in the years ahead. My apprenticeship was a wonderful life changing experience for me. It has allowed me to prove to myself that I do indeed possess a high enough Intelligence Quotient (IQ) as well as the application and work ethic to contribute to society as a Civil Servant. The sense of achievement, self-worth and service to my country that I have experienced are profound. I feel that what I do matters to society, to the taxpayer and to me. Every day I experience the feeling of human flourishing and living well that I believe I have been seeking my whole adult life.

This feeling of wellbeing has allowed me to make meaningful contributions to the lives of my granddaughters, one of whom is also now flourishing in the Civil Service.

I still find it hard to believe my good fortune in being given this second chance to make a difference and I cannot believe that other mature 'baby boomers' would also not find an apprenticeship a 'portal to self-fulfilment'. For me, all that was required was for an enthusiastic new Job Coach to ask the question and for me to have the self-confidence and curiosity to answer that question with a 'yes'.

I am part of the Cabinet Office Apprenticeship Network, which gives me the opportunity to help others as they travel through their own journey.



# 100th Counter Fraud Apprentice onboarded

Earlier this year Department for Work and Pensions (DWP) Government Counter Fraud Profession Team were thrilled to have reached the first 100 learners' enrolment onto the Level 4 Counter Fraud Investigation Apprenticeship (CFIA) programme. This achievement marked a significant step for DWP, helping to build its capability in preventing, detecting, and investigating fraud against its organisation and the wider public sector.

DWP started their CFIA journey back in September 2021; consisting of three cohorts of learners, made up of volunteers. The pilot learners have helped to evaluate the learning journey and help to shape the current CFIA delivery for DWP. Three of the pilot learners will soon complete their apprenticeship and will be DWP's first CFIA Apprentices to have undertaken this new style of investigatory learning. Enrolment onto the CFIA continues to be the primary learning routeway for all DWP Investigatory staff, whether new to DWP or transferring into an investigatory role.

Colleagues who have enrolled onto this apprenticeship, are gaining valuable knowledge and skills to investigate fraudulent activities, leading to further professionalism, increased efficiency, and reduced losses. This program equips our apprentices with the necessary ability to conduct investigations, collect evidence, and present cases to support prosecutions. The commitment and dedication shown by all the learners towards their own professional development through undertaking the CFIA is highly commendable.

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Department  
for Work &  
Pensions

DWP's achievement of reaching the 100th learner milestone and the continued enrolment of learners onto the Level 4 Counter Fraud Investigation Apprenticeship is a positive development for DWP and the public sector.

DWP have also welcomed the GCFP Board decision for CFIA apprentices to join the Counter Fraud Profession through a new 'trainee level' membership. The Public Sector Fraud Authority and DWP has now signed an agreement that enables this level of membership to be offered to our CFIA apprentices. This will complement their learning by providing access to our Knowledge Hub, weekly bulletins and monthly updates including Continuous Professional Development (CPD) events, conference invites and others, as well as becoming part of a counter fraud community, helping to build support and networking opportunities.

DWP is already seeing the benefits of this apprenticeship manifest itself from its pilot cohorts and is looking forward to seeing this continue to grow as more apprentices join the learning programme to continue DWP's fight against fraud.

#### Editor's note:

If this article has sparked your interest please do get in touch to see how you can get involved in the Level 4 Counter Fraud Investigators Apprenticeship to help build capability across government and public bodies.

Email us to find out more: [gcfp@cabinetoffice.gov.uk](mailto:gcfp@cabinetoffice.gov.uk)

Further details of the Level 4 Counter Fraud Investigators Apprenticeship and the assessment criteria can be found at: <https://www.instituteforapprenticeships.org/apprenticeship-standards/counter-fraud-investigator-v1-0>



# Fraud: A behavioural perspective

Behavioural science, as the study of human actions and interactions, offers a valuable lens through which we can dissect and understand the mechanisms of fraud - which is fundamentally a system of behaviours enacted by fraudsters, victims, bystanders, and platforms. In the quest to combat fraud effectively, examining the behaviour of all actors in the system is essential. This includes not just the fraudsters, but also the victims, potential victims, bystanders, and the institutions that might play a role in the fraud process.

Fraudsters, in many ways, are experts in manipulating human behaviour. They spend their days devising strategies to exploit victims effectively. This includes recognising potential targets based on vulnerabilities, crafting convincing narratives to build trust, and exploiting cognitive biases to cloud judgement. Their tactics are intricate, rooted in a deep understanding of their victims' emotions and thought processes. Therefore, countering fraud isn't just about addressing legal and financial systems—it's about understanding and countering this skillful manipulation of human behaviour.

There are many types of fraud, ranging from opportunistic scams to sophisticated and long-term forms of deception. From a behavioural perspective, some of the most interesting types of fraud are those that extend over longer periods of time, where fraudsters win the trust of victims and exploit them repeatedly. Investment fraud is an important example of this. It is a deceptive practice in which fraudsters offer investment opportunities, and misrepresent the true destination of the victim's money, typically claiming it is invested in high-performing funds, assets, forex, or cryptocurrency. They often lure victims deeper into the scam by sending false account statements showing impressive returns and encouraging the victims to contribute additional funds, when in reality, the claimed investments are non-existent or grossly misrepresented, with the money often being pocketed by the fraudsters or used in a Ponzi-like scheme.

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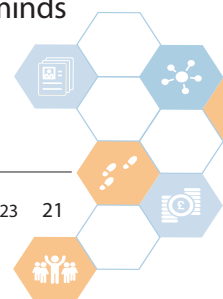
The current cost of living challenges have expanded the opportunities for fraudsters, as people grapple with financial uncertainty by looking for quick wins, or try to make the money they already have work harder by investing it. In one survey, 1 in 6 respondents said that they would be more likely to respond to an unexpected offer of an investment opportunity or loan because of current economic pressures. The Financial Times reports that investment fraud reports have risen by 193% in five years, alongside other types of so-called "authorised fraud", where victims willingly send payments to scammers under false pretences.

While victims' behaviours is only one aspect of the fraud behavioural ecosystem, their actions and decision-making processes hold substantial potential for preventative behavioural interventions.

## Why is raising awareness not enough to prevent fraud?

While raising fraud awareness might seem like the logical solution, it often falls short. Behavioural science reveals that the main barrier to behaviour change isn't always a lack of awareness, and that there are a complex range of influences that make individuals susceptible to fraud. While lack of awareness or knowledge might be one of those factors, there are significant psychological, emotional, and circumstantial influences that can make "raising awareness" a less successful strategy than one might expect.

Fraudsters often prey on vulnerable individuals, especially those who are lonely or isolated. They are often warm and charismatic, adept at building relationships, and winning the trust of their victims to create the illusion of a genuine friendship. These victims may fall into 'motivated reasoning,' where their wish for the opportunity offered by the scammer to be real means that they purposefully close their minds to evidence of deceit.



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This bias is so potent that victims may ignore warnings, dismiss contradictory information, and override in-built security measures. People may go to extreme lengths to preserve their belief in a real investment opportunity when it fulfils a deep emotional need.

Fraudsters also use 'in-group bias' to manipulate victims. This bias makes us prefer people we see as part of our group. Fraudsters create an 'us versus them' narrative where they and the victims are the 'in-group', while cynical friends, family, or authorities are the 'out-group'. They might craft a compelling story, framing victim and scammer as an emerging business partnership poised to seize a golden opportunity that others have missed out on through ignorance or fear, attributing the warnings of friends and family to jealousy. This strategy isolates victims, strengthens their trust in the scammer, and makes them more resistant to warnings from others.

Belief in a concept called the "Just-world Hypothesis" might also increase the risk of falling victim to fraud. This describes a belief in a world where fairness reigns, and everyone eventually gets what they deserve. People going through difficult times might feel that they are due for some good luck, and this sense of anticipated justice makes them prime targets for fraudsters. In the context of investment fraud, an individual experiencing financial strain may view a too-good-to-be-true investment opportunity as the turn of fortune they have been waiting for. These convictions can make it even more challenging for the victim to recognize and accept the harsh reality of the fraud.

"Authority bias" also comes into play. This bias makes us more likely to trust and follow the advice of perceived experts or authorities. In the complex and technical world of cryptocurrency and finance, fraudsters present themselves as knowledgeable insiders or experts, exploiting the victims' lack of understanding by promoting complex financial products that are difficult for members of the public to understand and verify. In a case reported by the FCA, fraudsters claimed that they were investing the money in "binary options", a financial derivative that is unlikely to be understood by inexperienced investors. By appearing as an authority, they convince victims to make risky decisions. Victims, swayed by the fraudsters' apparent expertise, might overlook the need for due diligence, disregarding the rule of investing only in what they fully understand.

The 'sunk cost' phenomenon is another significant behavioural factor. As victims invest more resources into a scheme, they grow increasingly reluctant to admit its fraudulent nature.

An intriguing aspect of this behaviour is that victims often convince themselves that they've only truly 'lost' when they acknowledge the fraud. Until they reach that point, they hold on to the hope of recouping their investments or even achieving promised returns. This hope can keep them trapped in the fraudulent scheme far longer than one might expect.

To shield themselves from the harsh reality of their situation, victims might go to great lengths to rationalise inconsistent or contradictory information. This can lead to them accepting convoluted and unlikely explanations for unfolding events. It's important to understand that this response is a natural human reaction to fear and uncertainty. The human brain is wired to avoid cognitive dissonance—the uncomfortable state of holding two conflicting views simultaneously. Thus, victims may latch onto narratives that allow them to maintain their current beliefs, even when faced with stark evidence to the contrary.

Policy makers, onlookers, and the wider public often find it difficult to comprehend why people believe seemingly unbelievable things, sometimes labelling victims as naive or gullible. However, when people subscribe to implausible beliefs, it's usually because those beliefs serve them in some way. Perhaps these beliefs provide much-needed hope for the future against a backdrop of personal pain or tragedy, or they see the scammer as their only ally in a frightening and hostile world. So self-deception can be seen as a natural coping mechanism, a way to deal with the fear and the potential loss that acknowledging the truth would bring.

### What solutions does behavioural science suggest?

Preventing fraud isn't merely about identifying and stopping fraudulent transactions; it begins much earlier, before fraudsters can weave their narrative and isolate their targets. An effective intervention strategy must give potential victims time to pause and consider the validity of their situation. Doubts about the authenticity of a new investment opportunity often take time to surface, and an early intervention can provide the necessary time for such doubts to develop.

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An essential aspect of fraud prevention is the nature and tone of intervention. When organisations, particularly financial institutions, alert customers to potential fraudulent activities, they need to consider psychological reactance—a phenomenon where people react defensively when they perceive their freedom is being threatened. This defensive reaction can lead customers to disregard important alerts and continue with potentially risky actions. It's therefore a delicate balance to strike—providing necessary security alerts while respecting customers' autonomy.

The tone, wording, and presentation of these alerts can significantly influence their effectiveness. Alerts should encourage cautious behaviour and empower customers to act wisely, rather than provoking defensive reactions. For instance, an overly intrusive or authoritarian message such as "Alert! This might be a scam!" could trigger psychological reactance and make a customer more likely to continue with the transaction just to assert their autonomy. In contrast, a more respectful and collaborative message such as "Do you know this person? Please confirm some details to continue" acknowledges the customer's autonomy and invites them to participate in securing their account.

The stigma associated with falling victim to fraud can also be a barrier to effective prevention. This stigma may deter individuals from admitting their vulnerability, seeking help if they suspect they are being targeted, or reporting fraud once it's happened. Therefore, any fraud prevention strategy should actively work towards destigmatising victimhood. It's crucial to help people understand their own characteristics that might make them more vulnerable to fraud - such as being elderly, having limited digital experience, being recently divorced or separated, forming new romantic connections online, or having recently come into money.

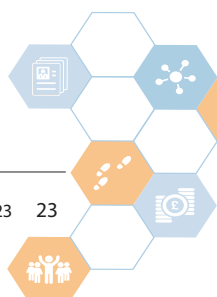
One more complex way to address this is through psychological profiling. This involves identifying patterns and traits that make some individuals more susceptible to fraud than others. Authorities and voluntary sector organisations could then use this data to develop risk profiles and implement targeted preventative measures, which may include education about common scams, tips for identifying fraudulent behaviour, or even going support from case workers.

This proactive and personalised approach can help build awareness and resilience among those most at risk, stopping fraudsters before they can do significant damage, although it may come at significant resource cost and pose privacy challenges.

Technological solutions also have a significant role to play in fraud prevention. For instance, financial institutions can build in-app educational modules about fraud prevention. However, since people often don't see themselves at risk, there needs to be an incentive for them to engage with these modules—offering premium features or discounts on banking services could be effective.

The development of an AI-based personal fraud assistant could offer a novel approach to fraud prevention. A sophisticated tool could monitor users' online interactions, flagging potential warning signs of fraudulent behaviour in real time. For instance, it could identify irregular financial transactions, suspicious links, or patterns of communication that match known fraud strategies. However, the successful implementation of such a tool requires building trust among users. People must be confident in the AI's capacity to protect their data and privacy. Ideally, this would be integrated directly into existing apps or platforms that people already use and trust—such as social media platforms, email providers, or banking apps—rather than requiring people to download a separate, unfamiliar tool.

In conclusion, tackling fraud requires a deep and empathetic understanding of the behaviours and vulnerabilities of victims and potential victims. It's crucial to remember that anyone can fall victim to fraud under the right circumstances, and stigma or blame does nothing to help solve the issue. Instead, we must maintain a curious and compassionate approach, investigating the complexities of human behaviour to devise effective prevention strategies. By exploring these behavioural nuances, we can work towards creating a safer environment, not just by raising awareness, but by arming individuals with the knowledge, skills, and tools they need to recognise and resist manipulation.



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# The Fraud Triangle and Corporate Psychopaths

Reasons for committing fraud can include ego driven greed and accountants wonder what types of people are willing to lie, cheat and steal to assuage that greed (Wells, 2001). Psychopathy researchers have always assumed that psychopaths, being egotistical and parasitic, would be fraudulent (Boddy, 2006). This article discusses the corporate psychopath - who would willingly engage in fraud and enjoy outwitting and stealing from others. For example, Madoff who orchestrated one of the largest (\$65 billion) frauds in history (Boddy, 2023) has been described as having many of the traits of psychopathy such as a skill in impression management. Similarly, Enron collapsed as the (then) largest fraud in US history and the organisation, and the key actors within it, have been associated with systemic and individual psychopathy (Boddy, 2015).

## Psychopaths

Psychopathy manifests in an emotional deficit which appears to correlate with abnormal brain connectivity and chemistry, centred in the areas of the amygdala and orbital/ventrolateral frontal cortex (Blair, Mitchell and Blair, 2005). Of relevance to this paper is that psychopathy scores have been found to predict a willingness to violate any type of morality (Glenn et al., 2009).

## Corporate Psychopaths

Not all psychopaths end up in prisons; many seek careers in major corporations. To differentiate these psychopaths from their more commonly researched anti-social and impulsive criminal peers, they have come to be called corporate psychopaths. They have been identified as the types of people who can easily enter companies, gauge opportunities, then manipulate people and commit fraud (Ramamoorti, 2008).

Under a rational cost-benefits analysis, fraud may present itself to the ruthless corporate agent as an attractive option for acquiring personal wealth.

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psychopathic leadership since  
2005.



In consideration of the possible benefits and unlikely costs, and without the inhibiting effect of a conscience, fraud may therefore be very attractive to the corporate psychopath.

## Corporate Psychopaths and the Organisational Environment

The presence of corporate psychopaths in an organisation has multiplier effects. Firstly, corporate psychopaths create a toxic environment in which employee revenge against an organisation perceived to be abusive and bullying, increases in the form of counterproductive work behaviour (Boddy, 2014) which could include fraud. Secondly, corporate psychopaths act as role models and stimulus for others. A toxic workplace environment thus promotes greater toxicity among the employees who work there. Similarly the ethical environment of a corporation has been shown to be linked with the quality of internal fraud control procedures (Kirsty and Nava, 2008).

Further, leaders influence workplace behaviour via the norms they set within organisations (Van Fleet and Griffin, 2006). Fraud at the top of an organisation may thus stimulate and facilitate fraud throughout the organisation and so create an environment where fraud flourishes. Fraud may even be ordained from senior managers to those below them as it was e.g., at WorldCom and the DVA (Rodriguez, Brown and Brookes, 2016; Dorminey et al., 2012). It is likely therefore that where the ethical environment has been negatively influenced by the presence of corporate psychopaths, the efficiency of internal controls will be weakened leading to a greater risk that fraud will go undetected.

## Theoretical Associations between Fraud and Psychopathy

Fraud may be especially attractive to corporate psychopaths because it would not affect their conscience, as they have none, but also because fraud perpetrators are less likely than other offenders to be caught, turned in, arrested, convicted, imprisoned or to serve long sentences if they are convicted (Romney, Albrecht and Cherrington, 1980). Fraud thus presents the psychopath with no internal inhibitions and with almost no external costs to being caught.

Thus, the fraud triangle, which underlies the current risk models for fraud detection, may be insufficient because it takes no account of the greater propensity for fraud that some individual 'dark' personalities may have (Epstein and Ramamoorti, 2016).

In terms of the 'fraud diamond', which extends the 'fraud triangle' to include 'capabilities', corporate psychopaths have the capability (personal traits and abilities) to commit and conceal fraud. Furthermore, accountants recognize that corporate managers set the accounting agenda in order to serve their own interests (Jones, 2011a) and that fraudulent accounting can entail fictitious sales, fictitious cash holdings and fictitious transactions (Jones, 2011b). Psychopaths are reportedly willing to lie and to falsify financial results to get promotion bonuses and other benefits and to commit fraud (Clarke, 2005).

Ego and a desire for money have been identified as probable drivers of fraud (Dorminey et al., 2012). In terms of ego, corporate psychopaths are reported to desire power, prestige and money and in related research the love of money has been significantly related to cheating behaviour (Rafik and Magdy, 2010). It is therefore no surprise that commentators on corporate psychopaths assume that they will be involved in fraudulent activities. As ruthless individuals who are prepared to lie and to cheat, they may be connected with any type of fraud that either directly or indirectly benefits them. Fraud may be committed against the company to directly benefit the corporate psychopath through the illegal acquisition of corporate assets.

Fraud may also be more indirect through, for example, a misstatement of the financial position of a division within a corporation or of the corporation's position, in order that the manager can benefit from a profit-share scheme, bonus scheme or share-option scheme based on the false view of the financial position.

### Empirical Evidence Associating Fraud and Psychopathy

According to one auditor, many fraud investigators have, in their professional practice, encountered people who appear to warrant a categorization as psychopathic (Malamed, 2012). This viewpoint is supported by empirical evidence, because in a quantitative study of auditors, 69% had reportedly experienced corporate psychopaths in their client management experience. Of these 70% had experienced more than one psychopath. In addition, 43% of the auditors who had experienced psychopathic managers reported that the psychopaths had committed fraud (Jeppesen, Leder and Futter, 2016).

Secondly, in terms of historical examinations, the UK fraudster Robert Maxwell, has been associated with multiple psychopathic personality traits (Boddy, 2016). Similarly, the key figure in the Enron scandal displayed many of the characteristics of corporate psychopathy (Boddy, 2015). These traits included a willingness to lie to employees, shareholders and the public, a grandiose sense of self-entitlement and a refusal to accept responsibility for their own actions in precipitating the corporate collapses through fraudulent accounting.

Perri has linked fraud with psychopaths in at least two case studies, while in another case Boddy found strong evidence of psychopathy in one executive convicted of financial fraud – who had also fraudulently stated his qualifications (e.g., fraudulently claimed to have a world class MBA) - (Perri, 2010; Boddy et al., 2015).

When corporate leaders with dishonest and ruthless personality types are involved in fraud then it may be especially difficult for subordinates to expose them because the corporate leader, particularly when known to be a bully, as many psychopaths are, can coerce them into misbehaviour by the implicit threat of dismissal from their posts. Indeed such leaders, through their example and leadership, may often influence the whole organisation so that it becomes fraudulent and dishonest at a systemic level (Wexler, 2008). Further, if the corporate leader is known to be ruthless and dictatorial then few employees will dare to question their tyrannical authority and the leader will be more easily able to get away with the misappropriation of organisational funds, even when the organisation is having financial problems (Wells, 2006).

Thus corporate psychopaths can be expected to influence all elements of the 'fraud triangle' which comprises of situational pressures e.g. pressures to perform to targets or achieve financial results, opportunities to commit fraud e.g. ineffective management controls or the ability to override those controls and the personalities of the individuals involved e.g. their moral character (Cohen et al., 2011).

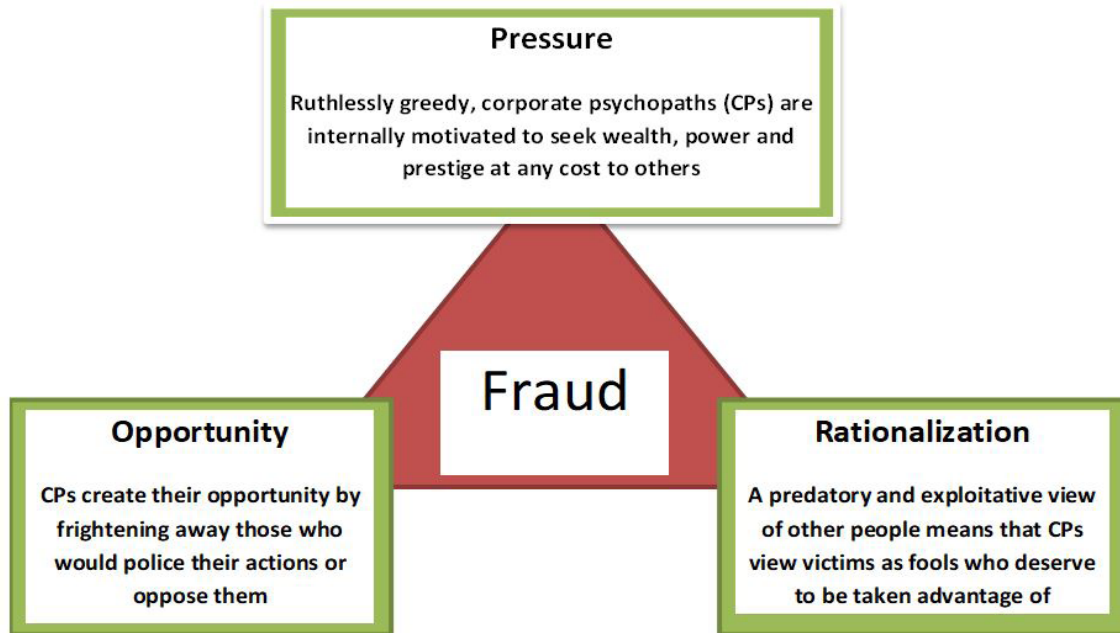
From some of the arguments put forward by Cohen and others it is evident that their premise is that managers are moral beings and will therefore be subject to peer pressure and subjective norms. However, this premise of inherent morality does not hold true for corporate psychopaths. For example, corporate psychopaths have no concern for or empathy with others and no conscience and so would not be influenced by any consideration of what their peers, such as their wives and colleagues, would think of them acting fraudulently.



With their desire for power, prestige and money, the drive for monetary success would be internal to the personality of the corporate psychopath and not the result of outside

pressures. Their relationship with the fraud triangle would be different to that of most people, as summarised in figure 1 below.

**Figure 1: Corporate Psychopaths Relationship with the Fraud Triangle**

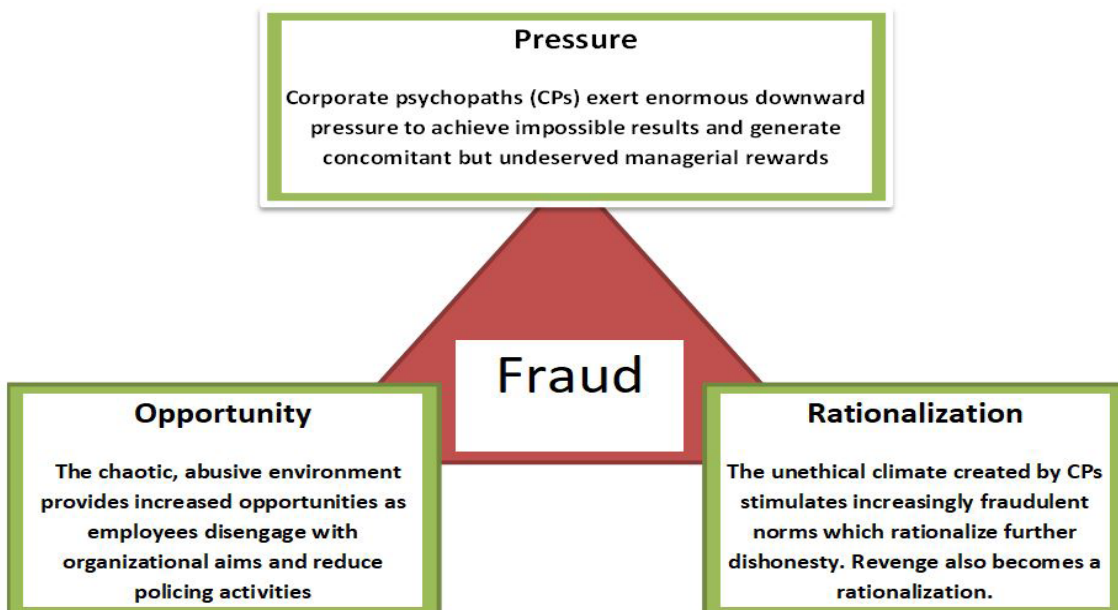


Corporate psychopaths would also, with their skilled manipulation abilities, tend to be the setters of organisation values rather than the passive recipients of those values. They influence the whole organisation in an ethically

negative direction and by doing so may encourage fraud at a systemic level.

Their influence on the fraud triangle would therefore be exceptional as summarised in figure 2 below.

**Figure 2: Corporate Psychopaths Influence on the Fraud Triangle vis-à-vis other Employees**

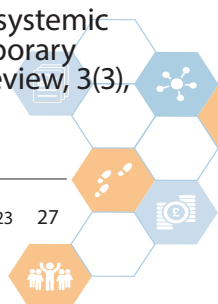


## Conclusions

Evidence implies that the majority of auditors will come across corporate psychopaths in their professional practice and that this is often in association with fraud. Therefore, an understanding of corporate psychopaths and how they interact with the fraud triangle themselves, and influence how others interact with the fraud triangle, benefits our overall comprehension of fraud.

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## My Counter Fraud Journey: A personal Insight

My career in investigation and counter fraud has spanned over 40 years, starting in the early 1980s when I joined Strathclyde police as a fresh-faced young constable, who went on to become a Detective in Glasgow. The second half of my career has been spent south of the border where I worked in the private sector as an investigator and manager of fraud investigation teams in the insurance industry.

I now talk for a living, passing on my experience and knowledge to others. I continue to develop myself and my knowledge in the world of counter-fraud, leadership and my newfound love of emotional intelligence which is something I believe should be in every investigator's toolkit, I would go further than that and suggest it should be on the school curriculum for every teenager in the country, if you've not discovered it yet your missing out.

I am often asked for tips by aspiring young investigators and those are primarily the same ones my dad gave me in 1983 when I walked out of the door to start my first shift, 'keep your ears and your eyes open and your mouth shut, learn from those around you and you will do alright'. Well, I took his advice, listened, watched, learned, and developed. I am still adhere to the advice to this day, although I do tend to speak a bit more these days. Reflecting in this advice, I realise this was my dad's point, learn from the people who have seen it, done it and been through it all and when you know more than others that's the time to start speaking to pass that knowledge and skills on.

Another question I am asked is if I still get the 'buzz' and whether it has changed over the years? My response is an emphatic YES. As an investigator it was getting that vital piece of evidence, the last piece in the jigsaw or making the arrest, as a manager, it was the buzz of one of my team calling me at 9 p.m. to tell me they had got a "result", how they had achieved it and talking the investigation through with them to ensure we were watertight and had left no stone unturned. Arguably my biggest buzz has come from the role I now do, training apprentices in the Level 4 Counter Fraud Apprenticeship.

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Intelligencia



Where I pass on my knowledge, expertise and hopefully my enthusiasm and passion for the job to our current and future investigators.

As the apprenticeship standard is fairly new it is only recently that students from the cohorts I have taught have gone to End Point Assessment (EPA), as I write this I feel a smile coming to my face when I think about the text messages, emails and LinkedIn posts that I get from investigators who have received their results from EPA and have passed or gained a distinction following 2

years of hard graft and dedication from them. I will remember every single one of them. I will watch with pride as their careers develop and flourish.

If I had a penny for every time someone said to me they would love my job as an investigator I would be a very rich man. I feel privileged that I have been able to practice and develop my craft over the past 40 years, it doesn't happen overnight and there is always something new on the horizon.

As the author Mark Twain famously said, 'Find a job you enjoy doing, and you will never have to work a day in your life'.



I make no apology for saying I did and it never really feels like work. The role can be challenging, and fraud is an area where we need to be continuously learning and keeping up with new and developing modus operandi. When I started investigating fraud we were dealing with cheque fraud, credit card fraud, long firm fraud and the like, we have however evolved and are dealing with fraud involving NFTs (Non Fungible Tokens), cryptocurrency, artificial intelligence and QR (Quick Response) codes, what will be next?

Fraudsters are always looking for opportunities and as we tighten security in one place, they move to another, take digital security and protect our personal data. How many of us now rip the labels from postage packages before shredding or burning them or both? The fraudster simply changes tack and steals, scans, or photographs our details on the post before it gets to us.

According to an article I read recently in the New York Times, cheque Fraud is on the rise again in the United States with people losing trust in digital money transfers and reverting to the good old M.O. of stealing mail from the postal system and “washing” any cheques (or is it checks) they find.

But it’s the diversity that I love, I have investigated all manner of crimes and in my weirdest but probably most interesting case to date the infection of an entire herd of pigs with blue ear disease. As an investigator you need to know the rules of engagement and hone your skills throughout your career, it is about the attention to detail, the

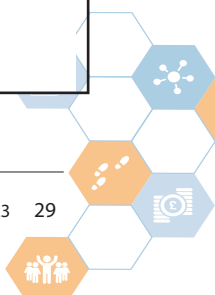
terminology you use, and the use of tried and tested processes and plans including the National Decision-Making Model, the Fraud Investigation Model, Briefing Models and other tried and tested investigation methods. More recently I have become a fan of emotional intelligence as an additional tool in the investigator’s toolbox, it goes to the very heart of being an investigator, and I am in no doubt, helping to cultivate the investigative mindset and “sharpen the saw”. Unlike IQ, EQ can be learned and developed throughout one’s life and is a critical tool.

Finally, as I approach the twilight of my career and reflect on my role as an investigator I look back and can honestly say I don’t have a single regret, I have met some wonderful people, worked with some incredible professionals, seen some incredible sights, experienced amazing highs and devastating lows, seen the best and worst that society has to offer and I wouldn’t change any of it for the world. Going forward I will continue to strive to learn, develop, and be the best that I can be and bring out the best in the learners of today and tomorrow whom we will entrust with safeguarding our economic future and well-being.

As fraud evolves, we must evolve and my advice for the modern-day investigator is, to know your trade, learn every day, be passionate, be driven but above all be true to yourself and never settle for mediocrity.

If I were 18 years of age now, would I do it all again? you bet your bottom dollar I would.

Onwards and Upwards!!!



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# The Government Counter Fraud Profession

In October 2023 we celebrated the five year anniversary of the official launch of the Government Counter Fraud Profession (GCFP). It's timely to step back and look at the landscape and context the Profession operated in back in 2018, and reflect on the evolution since then and the growth still to achieve.

## Why did we build a Counter Fraud Profession

Prior to 2018, we had seen a number of hard working experts who had worked collaboratively to identify the skills needed to investigate fraud, bribery and corruption. This led to the emergence of formal designations and approaches to previously ad hoc Continuous Professional Development (CPD) in larger organisations such as Department for Work and Pensions (DWP), His Majesty's Revenue and Customs (HMRC) and Department for Health and Social Care (DHSC)/National Health Service (NHS).

In law enforcement there was the Professional Investigations Program (PIP) which was adopted and followed as a training and development route by other agencies including the Home Office. This led to the introduction of cadres of practitioners who had a common training approach. Where they also worked in mature organisations, they were fortunate to have ongoing CPD to support them as they continued in their careers. This work was led and engineered by groups of highly engaged practitioners, and created the foundation that the Profession has been built from.

The gaps which remained included career pathways and a common set of standards, products and processes that practitioners could follow in a range of disciplines, including investigation, intelligence and prevention. There was no common approach to the training, development and support of practitioners and no common structure bringing together these groups. They therefore tended to operate in silos, and lacked opportunities to share best practice and learn together.

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At the time there was also a lack of recognition for Counter Fraud as a Profession. It didn't necessarily attract the respect that specialists working in other areas for example Audit, or Finance would receive. It was at odds given the training and skills involved to effectively practise in counter fraud. This could range from routine to highly complex fraud matters, which may involve multi jurisdiction, cyber enabled and organised criminality. The fraud we have to tackle is increasingly diverse - so too are the range of skills we need to fight back.

## Launch of the Profession

To tackle the gaps and challenges outlined above, a small group of experts initially from the public sector and later extending out to other sectors came together to form the Government Counter Fraud Profession Board in 2015. They created the blueprint for a dedicated Counter Fraud Profession. The experts came from those founding organisations, including HMRC, DWP, Health and also from smaller organisations who had invested in fraud resources and development, such as Land Registry, Student Loans Company and Network Rail. The Board first agreed a framework, setting the disciplines, where we would commit to developing standards, products and guidance for professionals. This would ultimately lead to career pathways and ways of progressing into and through the Profession. This would allow individuals to self evaluate their skills, identify gaps and plan targeted learning. For organisations, the standards helped them to establish the resources and skills they needed to support individuals, and for training providers, codified the learning outcomes to shape training offers aligned to the Profession.

By launch we had worked for 2-3 years with the groups outlined to develop standards in Investigation, Intelligence and set a Code of Ethics for members. This allowed us to work with mature organisations with established learning environments, to enable collective membership, allowing a launch with 3,000 members, from approx nine organisations at that time.

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The launch marked a step change for practitioners, as they remarked on at the time:

“I have a skill set that didn’t seem to fit into any organisation back in 1994. Now it does. For 25 years I’ve been looking for this! It’s great to have recognition and credibility for the skills I have and hard work that I do. The people that work for the government are motivated to keep the public purse safe”.

When we launched Mark Cheeseman, now Chief Executive Officer of the Public Sector Counter Fraud Authority (PSFA) and Chair of the Government Counter Fraud Profession (GCFP) Board, set out how the Profession had been built, and the impact it would have on individuals and organisations:

### The Counter Fraud Profession has been built upon:

- Collaboration - eighteen public bodies and over 100 external organisations have been involved in developing the profession.
- Choice - the profession recognises how the public sector works, all organisations and individuals have choice in how they have and continue to engage with the profession.
- Empowerment - members of the counter fraud community have been involved in shaping the profession and the standards that underpin it.
- Pace - the profession has focused on quickly delivering quality products so that they can be used.

We now have a structure that recognises the specialist skills that you have to tackle fraud, beyond investigations and intelligence and into areas like risk, prevention and Measurement.

### Key benefits to individuals:

- GCFP will be an active community and members will receive regular news and updates relevant to counter fraud.
- Greater recognition and professional credibility to those with specialist knowledge, skills and experience beyond those who are not in the Profession.
- Empowerment to control their own development through self-assessment against common Professional Standards and Competencies and personal development plans against a range of disciplines.

The GCFP has ambitious plans for the future and will be a world-leading profession which will continue to grow and develop over the years to come.

### Progress to date:

Since 2018, we have grown and evolved the Profession, membership has grown from c.3,000 to c.7,036 and from 9 to 65 organisations. We have also developed additional standards and guidance which underpin the training, development and career pathways. Some of the highlights to show progress are outlined below:

- Standards developed and agreed in Investigation, Intelligence, Fraud Measurement & Assurance, Prevention, Counter Bribery & Corruption, Leadership, Management & Strategy, and Sanctions, Redress & Punishment, Fraud Risk Assessment
- Categories and membership routes designed and introduced
- Code of Ethics for members
- GCFP Training designed and delivered in Fraud Risk Assessment
- GCFP Counter Fraud Leadership Programme piloted and open for applications
- Regular CPD events in a range of topics aligned to technical updates
- Governance evolved to include Cross Sector Advisory, Practitioner and Heads of learning groups, alongside approval panels for collective membership
- Professional Journal introduced with cross sector insight and readership
- Enhanced Collective Membership introduced
- Curriculum for Investigation produced
- Practice guidance in topics including internal fraud, and initial fraud impact shared
- Annual conferences for members and Apprentices from 2023
- Apprenticeship for Investigation aligned to Investigation standards
- Branding and communication approach agreed and delivered against



## Future and next 5 years

We have made good progress since the Profession was introduced and officially launched, but we still have work to do. This includes the move from a model where centrally we develop training to one where we engage more widely with learning providers, whether within or outwith Government to develop training aligned to the agreed standards and guidance. We have started to grow our membership, currently we have 7,000 members from the 13,000 practitioners working in the public sector and in central government alone. We need to accelerate our focus to assess and sign up more!

We have started our journey to push for development and growth in disciplines and careers beyond investigation, including risk and measurement. We have in the last two years trained 175 people in risk assessment, with the aim to reach 200 by April 2024. We will then focus on measurement for 2024 onwards. We will also continue to inform future training offers beyond investigation, starting with a fraud control apprenticeship. The Level 4 Investigators Apprenticeship which was introduced in 2019 has seen over 221 apprentices onboarded who are looking to complete in 2023/2024.

The strategy we have recently launched sets out the additional areas of growth we want to work towards. This includes a focus on diversity and inclusion, ensuring that we identify barriers to

people choosing a career in counter fraud. We can then put in structures to support those from socio economic backgrounds and fostering talent for the future.

We will continue to invest in our leadership, through the ongoing delivery of the Counter Fraud Leadership Program and over time will introduce a future leadership scheme to prepare a talent pathway.

## Thank you

I'm honoured to have been part of the group which started the development of the Profession. I'm excited to see what the future holds, and where we go next. I also want to thank all of those involved in the journey so far, without their vision, passion and enthusiasm we would not have been able to have the success we have to date.

I also want to end with an appeal to encourage professionals across sectors who have yet to take up the baton and offer their ideas, expertise and insight to do so, to help accelerate the path ahead. The Profession currently serves the public sector, but we should not limit ourselves to that and move to a future state where the Profession may support across all sectors.

If this inspired you and you want to get more involved in shaping the future of the profession contact me via [gcfp@cabinetoffice.gov.uk](mailto:gcfp@cabinetoffice.gov.uk).

**Continual development for members**

**Building deep counter fraud capability**

**Government Counter Fraud Profession Strategy 2023-2025**

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.

Find out more by visiting our [website](#) or contacting us by [email](#)

**Increase diversity and Inclusion**

**Investment in leadership skills now, and future**

**Increase marketing and promote the Profession**

Government Counter Fraud Profession



# Government Counter Fraud Profession

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