Committee	Audit and Governance Committee
Date and Time	26 November 2026 10:00am
	Public

Annual review of the Counter Fraud, Bribery and Anti-Corruption Strategy

Cabinet Member:	Councillor Roger Evans – Portfolio Holder for Finance
Lead Director:	Duncan Whitfield – Interim Section 151 Officer
Service Area:	Internal Audit
Report Author	Barry Hanson, Head of Policy and Governance
Officer contact details	07990 086409 barry.hanson@shropshire.gov.uk
Electoral Divisions Affected	All
Key Decision?	Not a Key Decision
Cabinet Forward Plan	Not applicable
Report considered by	Not applicable

1. Purpose of Report

1.1. This report outlines the measures undertaken to assess fraud risks, and how the Council manages these risks to prevent, detect, investigate and report fraud, bribery and corruption.

1.2. The Counter Fraud, Bribery and Anti-Corruption Strategy has been reviewed and continues to underpin the Council's commitment to prevent all forms of fraud, bribery and corruption whether it be attempted on, or from within, the Council. This demonstrates the continuing and important role the strategy plays in the corporate governance and internal control framework. This report also provides an update to members on national and local fraud-related issues.

1.3. Whilst the Council can never be free from fraud, it continues to be focused on acknowledging, preventing and pursuing fraud, bribery and corruption. The Audit

and Governance Committee is asked to reaffirm its support for the Council's Counter Fraud, Bribery and Anti-Corruption Strategy.

2. Recommendations

2.1. The Committee is asked to:

- Consider and endorse the revised Counter Fraud, Bribery and Anti-Corruption Strategy.
- Note progress in implementing the Council's counter-fraud arrangements and the outstanding improvement actions.
- Comment on the proposed approach to strengthening counter-fraud provision.

3. Background

3.1. The Council sets itself high standards for both members and officers in the operation and administration of the Council's affairs and has established arrangements for responding promptly to allegations or suspicions of fraud, bribery and corruption. It has in place policies, procedures and initiatives to prevent, detect and report on fraud, bribery and corruption, including a Speaking up about Wrongdoing policy, Anti Money Laundering (AML) procedures and guidance, all supported by an overarching Counter Fraud, Bribery and Anti-Corruption Strategy.

3.2. The Counter Fraud, Bribery and Anti-Corruption Strategy forms part of part five of the Constitution and was last reviewed and updated in November 2025. In reviewing the Strategy, only minor adjustments have been made to reflect organisational changes at the Council and the move to a more digital approach. All proposed changes are identified in the Strategy in bold, italic and underlined font.

3.3. The Strategy can be located on the Council's website alongside Speaking up about Wrongdoing policies for both staff and the public and Anti Money Laundering (AML) procedures and guidance. A review of these has identified minor changes which have been reflected in the Strategy and supporting policies, procedures and guidance.

4. Summary of Main Proposals

4.1. Shropshire's strategy clearly identifies the Council's commitment to an effective Counter Fraud, Bribery and Anti-Corruption approach as part of its overall Corporate Governance arrangements. This aligns with CIPFA's Code of practice on managing the risks of fraud and corruption and recognises that the strategy will enable the Council to:

- Acknowledge and understand fraud risks;
- Prevent and detect more fraud; and
- Pursue and punish fraud and recover losses.

4.2. The Strategy reflects best practice from the National Fraud Authority (NFA) Fighting Fraud Strategies and guidance from organisations such as ALARM (the National Forum for Public Sector Risk Management) and the IIA (Institute of Internal Auditors).

4.3. It is recognised that to reduce losses to fraud, bribery and corruption to an absolute minimum, a strategic approach with a clear remit covering all areas of fraud, bribery and corruption that may affect the Council is required. There needs to be a clear understanding of the importance of the links between policy work (to develop a counter fraud, bribery and anti-corruption culture, create a strong deterrent effect and prevent fraud, bribery and corruption by designing robust policies and systems) and operational work (to detect and investigate fraud, bribery and corruption and seek to apply sanctions and recover losses where they are found).

4.4. An integrated approach is required, with activity prioritised according to risk and evaluated by outcomes rather than activity alone.

4.5. The strategy continues to emphasise the Council's remit to reduce losses to fraud, bribery and corruption to an absolute minimum. It:

- Demonstrates links between 'policy' work and 'operational' work and is supported by robust arrangements and executive support to ensure counter-fraud, bribery and corruption measures are embedded throughout the Council.
- Shows agreement by both the political and executive authority for the Council's approach.
- Acknowledges the threat of fraud and assess the associated risks.
- Creates and maintains a strong structure to pursue its remit including:
    - Having the necessary governance, authority and support;
    - Providing for specialist training and accreditation;
    - Completing appropriate propriety checks;
    - Developing effective relationships with other organisations.
- Enables actions to tackle the problem by:
    - Integrating different actions;
    - Building a strong counter fraud and anti-corruption culture;
    - Having clear actions to deter any problem;
    - Acting to prevent fraud and corruption;
    - Early detection of any issues;
    - Investigating appropriately in accordance with clear guidance;
    - Having clear and consistent sanctions where fraud or corruption is proven;
    - Having clear policies on redressing losses.
- Focuses on outcomes and not merely activity.

National Picture

CIFAS Fraudscape 2026

4.6. CIFAS is a fraud prevention service in the United Kingdom. It is a not-for-profit membership association representing organisations from across the public, private and voluntary sectors. For Shropshire Council, these findings provide an important national context for reviewing fraud risks across payments, procurement, recruitment and applications for financial support or services, rather than evidence of the incidence or value of fraud locally. They reinforce the importance of robust identity and eligibility checks, independent verification of changes to supplier bank details, effective information security, staff awareness and lawful data sharing. In line with the Council's Counter Fraud, Bribery and Anti-Corruption Strategy, the report supports a proactive, risk-based approach to prevention, detection and

investigation, helping to protect public funds, sustain services and maintain public confidence.

4.7. Over 444,000 cases were recorded on the National Fraud Database (NFD) in 2025 which is a record number of cases and a 6% increase on the previous year. High risk areas of fraud identified by them in 2026 include:

- Identity fraud is still the most commonly reported fraud risk type. Although identity fraud filings fell by 3% year-on-year it accounts for over half of all reports. This modest reduction is accounted for by a shift in criminal tactics rather than a reduction in harm, with fraudsters increasingly targeting account takeovers, particularly via mobile phones.
- Over 78,000 cases of facility (account) takeover were recorded on the NFD in 2025. Nearly 1 in 5 (18%) of all fraud-risk cases reported to the Cifas are now account takeovers. The telecommunications sector recorded the greatest volume of account takeover cases. It now accounts for the majority of such cases (62%, previously 48%), driven by the sustained rise in mobile phone-related filings.
- In 2025, over 106,000 cases of misuse of facility[1] were recorded on the NFD, a 43% increase on 2024. Increasing bank account misuse reflects the evolving recruitment tactics of fraudsters, with victims encouraged to pass on funds or share banking details. In some cases, personal information is being sold to criminal networks to support account opening and misuse.
- In 2025, more than 22,000 incidents of money muling[2] were recorded on the NFD, following the introduction of a new money mule filing category. Cases primarily involved personal bank accounts, which accounted for 89% of money muling filings, as well as business bank accounts, which comprised 4% in 2025. This newly introduced Cifas filing category now enables muling activity to be more reliably tracked across an expanding range of facilities, such as personal credit cards, pre-paid cards and money transfer accounts.
- Over 16,000 cases of false application were recorded on the NFD in 2025, a 24% fall on 2024. Reductions were observed across many sectors, with the largest decline in relation to bank account cases (-27%). Among those Cifas members who submitted cases in both 2024 and 2025, the majority (55%) reported a decrease.
- In 2025, 288 were recorded on the Insider Threat Database (ITD), a 21% increase on 2024. Dishonest action by staff to obtain a benefit by theft or deception is the most common case type and again accounts for the largest share of filings made to the ITD. Volumes increased by 28%, rising from 116 to 148. It now accounts for 48% of all cases. The most frequent filing reasons were abuse of company time or privilege (15%), false expenses submissions (13%), and theft of IT equipment (11%).

4.8. The full report is available at:
Cifas Fraudscape 2026 Report

Government Counter Fraud Functional Strategy 2024-2027

[1] Misuse of Facility refers to the improper use of an account, services or resource by someone who has legitimate access.
[2] Money muling is a form of money laundering where an individual transfers illegally obtained money through their personal bank account on behalf of others, often keeping a commission

4.9. This strategy outlines the mission and strategic objectives of the Government Counter Fraud Function. It focuses on understanding, detecting, and preventing fraud against the public sector.

Initial Fraud Impact Assessment (IFIA) Guidance

4.10. Released in March 2024, this guidance provides a framework for assessing the impact of fraud as part of new major spending activities.

Government Counter Fraud Profession Standards and Guidance

4.11. Updated in July 2024, these standards cover all core disciplines and sub-disciplines within the Government Counter Fraud Framework, including a new standard for Fraud Intelligence Practitioners.

Fighting Fraud and Corruption Locally (FFCL); A Strategy for the 2020s

4.12. The Fighting Fraud and Corruption Locally Strategy (FFCL)[3] is England's counter fraud and corruption strategy for local government. It acts as a guide for council leaders, chief executives, finance directors, and all those with governance responsibilities. It is aimed at local authorities who undertake work in the counter fraud area. The Companion contains good practice and a checklist for local authorities to use as part of making sure they have the right processes and resources in place. The Council's Counter Fraud, Bribery and Anti-Corruption Strategy continues to be aligned to this checklist. The Internal Audit team completed a review against the Fighting Fraud Locally Assessment and the results from this were fed into the wider review of the Council's fraud risks.

4.13. The LGA published Fighting Fraud and Corruption Locally 2026[4] on 22 October 2026. The recommendations in the new strategy will be considered in the coming months.

National Fraud Initiative (NFI)

4.14. The National Fraud Initiative (NFI), led by the Public Sector Fraud Authority, matches electronic data within and between public and private sector bodies to help prevent and detect fraud and error. The Council is mandated to take part in this exercise. Relevant services review the resulting matches to identify fraud or error.

4.15. As at 4 November 2026 the 2024/25 NFI exercise has identified £22,064.60 to be recovered with estimated future savings of an additional £106,124.45 had these errors not been detected. The amounts to be recovered relate to pensions and the Council Tax Reduction Scheme. The estimated future savings relate to deceased concessionary travel pass holders and resident's parking permits.

4.16. The data for the 2026/27 NFI exercise has been submitted and the results are expected to be received by the Council in December 2026.

[3] Fighting Fraud and Corruption Locally | Insights | Cifas
[4] Fighting fraud and corruption locally 2026 | Local Government Association

Transparency Requirements

4.17. To comply with the Local Government Transparency Code 2015, the council is required to publish identified data sets.

4.18. The Council has a publication scheme which provides a repository/signposting to publicly available information. Legislation on transparency applies to anti-fraud activities. The Council has complied with these requirements, the results of which can be found on the web site.[5]

Update on Regulation of Investigatory Powers Policy and Guidance (RIPA) Activity

4.19. RIPA Policy and Guidance sets out the approach the Council will take with respect to the authorisation and use of surveillance activity to deliver the Council's statutory and public duties, whilst protecting individuals' right to privacy. The Council's existing Regulation of Investigatory Powers Policy was updated in February 2022 and approved by Cabinet[6]. The updates ensure that any surveillance activities undertaken by the Council are compatible with the human right to privacy by ensuring compliance with the requirements of the Regulation of Investigatory Powers Act 2000 (RIPA), the Investigatory Powers Act 2016 (IPA), the European Convention on Human Rights (ECHR) and the Human Rights Act 1998 (HRA). The Audit and Governance Committee's governance role is reinforced in the refreshed policy and guidance.

4.20. The Policy addresses the use of activities that involve:

- the surveillance of individuals;
- the use of undercover officers and informants, known as Covert Human Intelligence Sources (CHIS); and
- the obtaining of communications data.

4.21. All Council applications to acquire communications data are processed through the National Anti-Fraud Network which acts as the Council's Single Point of Contact (SPoC). National Anti-Fraud Network (NAFN) engages with the applicant and the Office for Communications Data Authorisations (OCDA) to obtain authorisations on the Council's behalf. A senior manager at service manager level or above within the Council must be made aware of all applications before they are submitted to NAFN for processing.

4.22. The Investigatory Powers Commissioner's Office (IPCO) is no longer routinely undertaking annual inspections. It has requested that each local authority should provide a written update, in the first instance, on its compliance with the legislation to enable IPCO to assess whether or not a remote, or in some cases, in-person, inspection is required.

4.23. The Chief Executive has been notified that, during 2026, the Council is scheduled to receive its inspection by the Investigatory Powers Commissioner's Office (IPCO). The inspection will assess the Council's compliance with the Regulation of Investigatory Powers Act 2000 and the Investigatory Powers Act 2016. IPCO requested preliminary high-level information, which the Council has provided.

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[5] https://shropshire.gov.uk/open-data/

[6] RIPA POLICY AND GUIDANCE (shropshire.gov.uk)

4.24. The Council has engaged a specialist to undertake an independent review of its RIPA procedures. The review will assess the Council's policy and procedures and will include a specific training needs analysis. This work commenced in August 2026 and is expected to be completed in December 2026. Formal training is scheduled for relevant Officers in December 2026. The allocation of responsibilities for the RIPA Coordinator and Authorising Officers is currently being reviewed. The Service Director, Legal and Governance, remains the Senior Responsible Officer for the Council's RIPA arrangements. These actions are intended to provide additional assurance that the Council's RIPA arrangements remain compliant, proportionate and subject to appropriate governance and oversight.

Whistleblowing Policy

4.25. The Council has a whistleblowing policy for the public and one for its employees. Both policies have been reviewed and updated in respect of key contacts and staff information. No changes are proposed to the reporting process. An annual reminder is circulated to all employees to raise awareness as to the availability of this policy.

4.26. Both policies are publicly available on the Council's website, enabling staff to access them privately outside the workplace.

Anti-Money Laundering (AML) Procedure

4.27. There are no revisions proposed to the Council's Anti-Money Laundering procedure and guidance. They continue to reflect The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. Training is available on the Council's electronic training tool, Leap into Learning. The AML Officer and deputies remain aware of their responsibilities. In addition, Directors continue to spread awareness, identify any money laundering risks in their areas to be shared at least annually with the AML Officer and identify employees who need training.

Serious Organised Crime Checklist

4.28. Organised crime includes drug trafficking, human trafficking, child sexual exploitation, high value fraud and cyber-crime. Organised crime groups may seek to benefit from public services in different ways, including to raise money through fraudulent activity and to use businesses / services used by local authorities to launder criminal proceeds. In this way public money can be lost to local authorities and can ultimately fund other illegal activity.

4.29. The Home Office Serious and Organised Crime report and checklist provide a methodology to help the Council identify vulnerabilities and strengthen safeguards. The checklist evaluates our response and activities in relation to:

- Awareness, Strategy, Guidance and Training
- Risk Management
- Communication and Information/ Intelligence Sharing
- Whistleblowing
- Assurance
- Operational controls for

- Licensing
- Planning/ Development management
- Social Housing
- Procurement
- Insider threat

4.30. Directors, Heads of Service and key Procurement Officers continue to evidence activities against the checklist providing a balanced assessment of the Council's exposure to the risks. In the main, at this high level, risks appear well managed and where improvements can be made, actions have been highlighted as part of an improvement plan. The Council's Commissioning and Assurance Board continues to oversee operational management of these actions. The checklist was fully reviewed in December 2023 and will be due for full review in December 2026.

Awareness and training

4.31. Fraud awareness training is available on the Council's eLearning tool, Leap into Learning and continues to result in positive feedback from recipients. Questions explore awareness and knowledge of counter fraud procedures including the availability of the whistleblowing policy.

Qualified officers

4.32. Internal Audit has officers trained, up to date and capable of undertaking investigations in a professional manner as the need arises. All Internal Audit officers have received the HR training for investigating officers. One officer is an accredited CIPFA Counter Fraud Technician. Other members of the Audit team have considerable experience in conducting investigations. Lessons learnt from investigations are used to inform management of control issues and the need for improvements to prevent recurrence. These reports are shared with Directors.

Shropshire Council counter fraud risks and plans

4.33. UK local authorities face several significant fraud risks. These risks highlight the need for robust fraud prevention and detection measures within local authorities to protect public funds and maintain trust. The Internal Audit team recently completed a review against the Fighting Fraud Locally Assessment and the results from this were fed into a wider review of the Council's fraud risks.

4.34. The following measures are in place or planned to identify and mitigate fraud risks:

- Housing benefit investigations are referred to the Department for Work and Pensions Single Fraud Investigation Service for action. Housing Benefits, Internal Audit and Human Resources officers continue to jointly risk assess any employees that are suspected of benefit fraud to consider if internal investigations are required or Council assets within the employee's control may be at risk. A Housing Benefit audit was completed in 2022/23 and given reasonable assurance.
- The data for the 2026/27 NFI exercise has been submitted and the results are expected to be received by the Council in December 2026.
- To reduce the risk of cyber fraud and the impact it would have on all areas of the Council, we are completing an ongoing programme of IT Audit work of key infrastructure systems. We are also part of a multi-agency working

group which is developing a draft Local Resilience Forum ICT and Cyber Response Framework to manage the tactical aspects of a multi-agency response to a cyber-attack.

- Internal Audit resources have been deployed to provide assurance and advice in respect of initiatives such as data analytics for financial systems; recruitment processes; procurement / implementation of new systems and internal control self-assessments.
- The current year audit plan includes several internal audit reviews that have been conducted, or are planned, to help ensure appropriate controls are in place, and are operational, to counter the fraud risks identified from the risk assessment:
  - IT reviews, as detailed earlier in this section
  - Payroll data analytics (quarterly)
  - Children's Direct Payments
  - Personal budgets, deferred payments
  - Counter fraud work, NFI participation, review of policies and delivery of training and awareness campaigns
  - Grant reviews across all Council services
  - Contracts and tendering including financial evaluations
- In August 2026 a complete independent review of the Council's fraud risks was undertaken by the Internal Audit team. The Fraud risk register was updated as part of this process.

Counter Fraud management options from 2026 onwards.

4.35. The Section 151 Officer is assessing options for future corporate counter-fraud provision, including an internal team, outsourced, co-sourced and partnership arrangements. The assessment is expected to conclude by December 2026 and will inform the 2027/28 budget process. Implementation is provisionally intended from 1 April 2027, subject to funding, procurement requirements and the necessary approvals. Existing arrangements will continue in the interim.

4.36. To strengthen current arrangements and inform the longer-term delivery model, the Council has reviewed its fraud risk registers and developed a proposed programme of proactive counter-fraud and fraud-related assurance work. This targets areas of higher fraud exposure and known control weakness, including cyber-enabled fraud, direct payments, adult social care, internal fraud, procurement and contracts, revenues, National Fraud Initiative matches, mandate fraud and duplicate payments. The programme will support market engagement to test external capacity, expertise and indicative costs, refine the scope and prioritisation of work, and provide further evidence to determine the most appropriate and sustainable future delivery model.

5. Alternative Options

5.1. The alternative option would be for the Committee not to endorse the Counter Fraud, Bribery and Anti-Corruption Strategy. This would reduce formal member assurance and oversight of the Council's strategic approach to preventing, detecting and responding to fraud, bribery and corruption, and could weaken the clarity of the Council's commitment, responsibilities and planned improvement activity.

6. Key Risks and Opportunities

6.1. The Audit and Governance Committee has a key function in ensuring that effective corporate governance arrangements are maintained in the Council.

Risk	Mitigation	Link to Strategic Risk
Failure to maintain and implement an effective Counter Fraud Strategy could leave the Council more exposed to fraud, bribery and corruption, resulting in financial loss, service disruption and reduced public confidence.	Review and refresh the Counter Fraud Strategy regularly; maintain clear responsibilities, proportionate preventative controls and arrangements for reporting, investigating, sanctioning and recovering losses.	Governance, assurance and value for money.
Failure to identify and assess emerging fraud risks could mean that preventative and detective controls are not targeted at the areas of greatest exposure.	Maintain an up-to-date fraud risk assessment and fraud risk register, informed by internal intelligence, investigations, the National Fraud Initiative and relevant national guidance; ensure identified risks have named owners and proportionate actions.	Governance, assurance and value for money.
Insufficient fraud awareness, training or accessible reporting routes could delay the identification and escalation of suspected wrongdoing and weaken the Council's counter-fraud culture.	Provide proportionate fraud-awareness training and regular communications; promote clear confidential reporting routes and whistleblowing arrangements; and ensure concerns are assessed promptly by suitably trained officers.	Governance, assurance and value for money.
Failure to monitor delivery of the Strategy and act on identified weaknesses could allow losses, control failures or recurring fraud risks to persist without effective oversight.	Monitor delivery, investigations, recoveries and lessons learned; report progress and significant issues to senior management and the Audit and Governance Committee; and escalate overdue actions.	Governance, assurance and value for money.

7. Council Priorities

7.1. The Counter Fraud Strategy supports delivery of the Council's Corporate Plan 2026–2030 by strengthening the protection and effective stewardship of public resources. Its focus on preventing, detecting and responding to fraud, bribery and corruption, supported by proportionate controls, clear accountability, staff awareness and effective investigation, helps reduce avoidable losses and

supports financial sustainability. By targeting activity towards areas of greatest risk, learning from identified incidents and monitoring delivery through the counter-fraud action plan, the Strategy contributes to transparent decision-making, organisational resilience and the efficient delivery of services for Shropshire's communities.

8. Financial Implications

8.1. Approval of the Counter Fraud Strategy does not, in itself, give rise to direct financial implications. Its effective implementation will, however, help protect public funds by strengthening arrangements to prevent and detect fraud, support the recovery of losses and target counter-fraud activity towards areas of greatest financial exposure. Any additional resources required to deliver a future corporate counter-fraud model will be subject to the Council's normal budget-setting and approval processes, with a dedicated team being considered as part of the 2027/28 budget process, subject to an appropriate budget being identified.

9. Legal and HR Implications

9.1. There are no direct legal or human resource implications arising from approval of the Counter Fraud Strategy. Its implementation will, however, support compliance with relevant legislation and Council policies relating to fraud, bribery, corruption, money laundering, data protection, investigatory powers, employment and whistleblowing. Any counter-fraud enquiries, investigations or sanctions involving employees will be undertaken lawfully, fairly and proportionately, in accordance with established HR procedures, employment rights, confidentiality requirements and appropriate professional advice.

10. Electoral Division Implications

10.1. There are no direct implications for any specific electoral division arising from the Counter Fraud Strategy, as it establishes a Council-wide framework for preventing, detecting and responding to fraud, bribery and corruption. Its effective implementation supports all electoral divisions by protecting public funds, promoting consistent controls across services and helping ensure resources are available for their intended purposes across Shropshire.

11. Health, Social (including "Child Friendly Shropshire") and Economic Implications

11.1. There are no direct health, social or economic implications arising from the Counter Fraud Strategy. However, effective counter-fraud arrangements help protect public funds and services, including those supporting vulnerable adults, children and families, by reducing losses and ensuring resources are used for their intended purpose. Proportionate prevention, detection and investigation activity also supports fair access to services, protects the local economy and maintains confidence in the Council's stewardship of public resources.

12. Equality and Diversity Implications

12.1. There are no direct equality and diversity implications arising from the Counter Fraud Strategy. Its implementation will, however, be undertaken fairly, consistently and proportionately, with due regard to the Council's equality duties, accessibility

requirements and the need to avoid bias or discrimination. Counter-fraud controls, data matching, investigations and sanctions will be evidence-based and subject to appropriate safeguards, helping to protect public resources and support fair access to Council services.

13. Climate Change, Biodiversity and Environmental Implications

13.1. There are no direct climate change, biodiversity or environmental implications arising from the Counter Fraud Strategy. However, effective counter-fraud arrangements help safeguard public resources, support compliance with environmental legislation and grant conditions, and reduce the risk of fraud or misuse within procurement, contracts, grants and programmes connected with the Council's environmental and sustainability commitments.

14. Background Papers

- CIPFA: Code of practice on managing the risks of fraud and corruption, October 2014
- The Bribery Act 2010
- NFA Fighting Fraud Together, the strategic plan to reduce fraud
- Fighting Fraud Locally: The Local Government Fraud Strategy 2020
- Government Counter Fraud Profession Standards and Guidance
- Initial Fraud Impact Assessment (IFIA) Guidance
- Government Counter Fraud Functional Strategy 2024-2027
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Regulation of Investigatory Powers Policy February 2022
- Home Office Serious and Organised Crime report and checklist 2017
- Cifas Fraudscape 2026 Full Digital Report

15. Appendices

Appendix A - Counter Fraud, Bribery and Anti-Corruption Strategy 2026