

Failure to Prevent Fraud: Moving from Awareness to Action

Key takeaways from our recent
webinar



Start with Governance. It's the regulator's first stop

Why it matters: They won't just ask for your policy, they'll ask for your board minutes.

Key Action: Table FtPF at board level before September. Ensure fraud is explicitly addressed in governance structures, senior management statements, and risk committee agendas.



Training Needs to Be Bespoke. And provable

Why it matters: Off-the-shelf fraud training won't cut it. Regulators expect tailored content, high completion rates, and MI that proves staff got the message.

Key Action: Prioritise high-risk roles with risk-aligned content. Make tone-from-the-top visible in the rollout.



Integrations Beats Reinvention.

Why it matters: You don't need a separate FtPF empire. Smart firms are folding FtPF into existing risk assessments and controls - AML, ABC, and conduct frameworks.

Key Action: Perform a delta analysis. What's missing, and where can FtPF be mapped to what you already have?



Your Culture is Already Speaking. What's it saying?

Why it matters: Regulators will use cultural signals, like whistleblowing data, code of conduct breaches, and leadership messaging, as proxies for control maturity.

Key Action: Stress-test your culture. Would your staff understand expectations and escalate concerns? Would leadership back them?



Documentation Is Your Defence.

Why it matters: When enforcement comes, you'll need to show why your approach was reasonable, not just that it exists.

Key Action: Capture rationale, decisions, and signoffs. Build an evidence trail that makes your judgement calls stand up.



Silos Kill Readiness. Get the right people around the table

Why it matters: FtPF readiness isn't a second-line project. Risk, fraud, legal, HR, ops, everyone needs a seat. Without joined-up ownership, gaps multiply.

Key Action: Create a cross-functional working group now. Map roles and responsibilities. Align fraud risks with MI, HR triggers, supplier oversight, and operational control points.



Not sure where to start?

Use our 3-step readiness sprint:

-  Board-level endorsement
-  Targeted risk assessment refresh
-  Documented ownership map

Download our Operational
Playbook for more

For more insights, reach out to
us at
[Plenitudeconsulting.com](https://plenitudeconsulting.com)