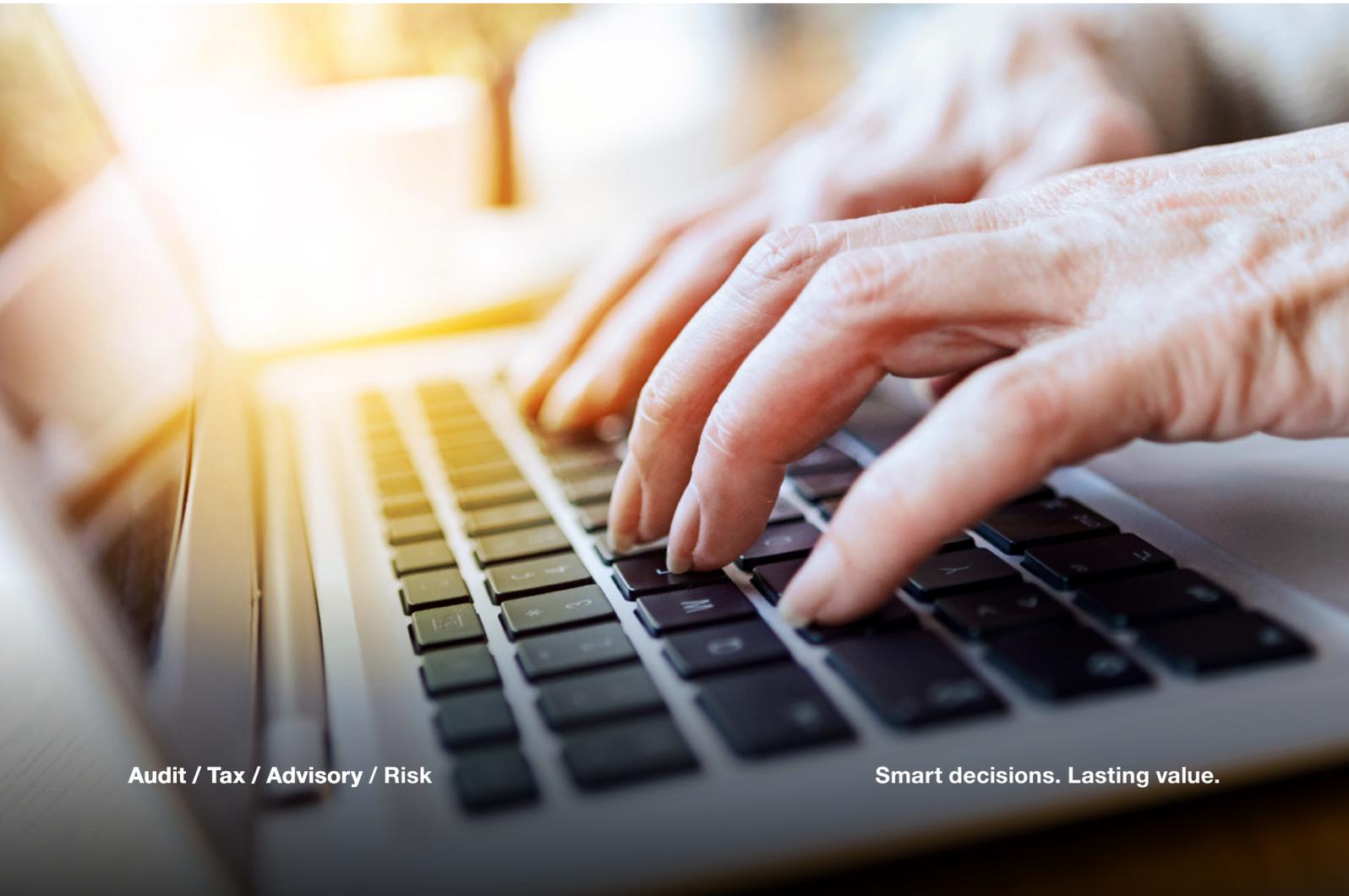


The nature and extent of pensions fraud

Jim Gee, Mark Button, David Shepherd and Dean Blackburn



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The UK



£190bn

Fraud losses in the UK equate to **£190 billion** each year¹.

55%

Since 2009, losses owing to fraud have risen by over **55%**².



3-6%

An average organisation should expect losses owing to fraud to account for between **3-6%**, although in some cases is as high as **10%**³.

¹ Annual Fraud Indicator 2019
² The Financial Cost of Fraud 2019
³ The Financial Cost of Fraud 2019

UK pension sector

Growing risks

Internal fraud, identity fraud and cybercrime are all growing risks.



£6bn

We estimate fraud losses in the UK pension sector to be upwards of **£6 billion**.



Reducing losses

Losses can be significantly reduced when accurate information about their nature and extent is available.



Introduction

Fraud is a pernicious problem. Its economic effects are clear; private companies are less financially healthy and stable, the quality of public services is reduced, individual citizens have less disposable income and charities are deprived of resources needed for charitable purposes. In every sector of every country, fraud has a serious and detrimental impact on the quality of life.

In respect of pensions, fraud undermines the value of income for people at a time of life when sources of income become more limited, and the chances of financial recovery are reduced.

Pension schemes are attractive to fraudsters. Large sums of money being held for beneficiaries, who, in most cases, have very little involvement in overseeing their accumulation, stretched over a long time period, presents a fertile opportunity. There is an assumption by beneficiaries that 'everything will turn out alright' when they retire. This is occasionally compounded by a lack of knowledge surrounding the complex and far removed management of an individual's fund.

Pensions account for significant sums of money, both in the payments made to pensioners and the investments of the pension schemes which provide them. The situation does seem at odds if one compares the extensive protection that the banking sector puts around the relatively small sums usually found in our current accounts, with the lax protection in place around the much larger sums held in pension pots.

All these factors combine to create a sector where:

- large amounts of money are paid and invested
- the beneficiaries of that money are relatively inactive
- those administering and responsible for it are only recently, protecting themselves to an extent proportionate to the risks.

In recent years, the pension liberation reforms have stimulated an increase in frauds targeting those with pensions. This has, in turn led to an increase in the action by authorities to tackle this problem. However, the media focus on 'pension liberation frauds' has masked a range of opportunities for fraud in the wider pensions sector. These include frauds by those running pensions schemes, inappropriate investments and the targeting of pension schemes by external fraudsters, sometimes those involved in organised crime. These risks have received less attention.

This report highlights the many emerging risks of fraud in the pensions sector, and, for the first time, provides an estimate of the cost. Fraud against pension schemes is serious because of both its scale and impact. A greater understanding of the real financial cost of fraud will drive further and faster progress in ensuring that pension schemes are properly protected.



Pensions and the risk of fraud

Across state, public and private pensions there are around £190 billion in payments made each year and £2.9 trillion in assets is invested each year by pension funds⁴.

Pension payments are made by defined benefit and defined contribution schemes and are derived from schemes originated by companies or public sector bodies as well as those sourced by individuals. Pension schemes are responsible for very large investments. Given the scale and diversity of the sector the risk of fraud is high.

Investment and misappropriation risks

The large sums of money pension funds hold are attractive targets for fraudsters. There is evidence of corrupt insiders investing in inappropriate schemes and organised fraudsters targeting staff running pension funds.

- The Pensions Regulator (tPR) has also taken an interest in this issue and sought to intervene to prevent potential problems.

4. FCA, 2018; ONS – MQ5. Investment by insurance companies, pension funds and trusts October to December 2018

Case studies

- 🔍 In January 2019, the former head of the Westminster City Council pension fund was jailed for seven years. He had been found guilty of stealing over £1 million from the fund by diverting monies earmarked for investments for his own personal use⁵.
- 🔍 In February 2019, an accountant took over £280,000 from a pension scheme, for which he was a Trustee, to invest in one of his failing businesses. He falsified details of a meeting that approved it⁶.
- 🔍 In two further cases due for imminent trial, a former director and Trustee of a pension scheme for his own company, is accused of stealing £250,000 from the scheme⁷. In another example, a director and Trustee of a pension fund is being prosecuted for failing to disclose information concerning investments made⁸.
- 🔍 In November 2018, a Chief Executive Officer (CEO) and Trustee of a pension scheme was banned from being a Trustee after a whistle-blower highlighted he was planning to invest £1.2 million of the pension fund in the firm he was CEO of and a major shareholder in⁹.

🔍 In May 2019, the Trustees of the pension scheme for Dunnes Stores were replaced by tPR after a catalogue of governance failures¹⁰.

🔍 tPR banned two Trustees after they were found to lack competence, having (unintentionally) invested some of the pension funds into fraudulent investment schemes¹¹.

As in that case, Trustees and administrators are sometimes defrauded by those they invest in.

🔍 A pension fund based in Norfolk, UK covering 90,000 members largely from the local council, was part of a successful case to sue Los Angeles-based Puma Biotechnology and its CEO, who had made false claims which led to artificially inflating the share price. This resulted in a £50,000 loss to the pension fund (and a £100 million loss across all defendants¹²).

5. Public Sector Executive, 2019
6. Accountancy Daily, 2019
7. BBC News, 2019
8. Pensions Regulator, 2019
9. Pensions Regulator, 2018
10. Pensions Regulator, 2018
11. Pensions Regulator, 2018
12. Eastern Daily Press, 2019

Identity fraud

Pension schemes make millions of payments each year and there are a variety of risks of fraud in this area. There are risks from internal fraud where corrupt staff use their knowledge to facilitate a variety of frauds. Some parts of the sector are more prone to potential fraud from this type of insider threat. For example, research has estimated that there are over 1.6 million 'lost' individual pension funds worth around £20 billion¹³. These 'lost' pensions are due to beneficiaries moving addresses and jobs frequently, and losing track of their past investments. Such monies are vulnerable to corrupt insiders who can use their knowledge to divert pension payments, before the real beneficiaries can register a legitimate interest.

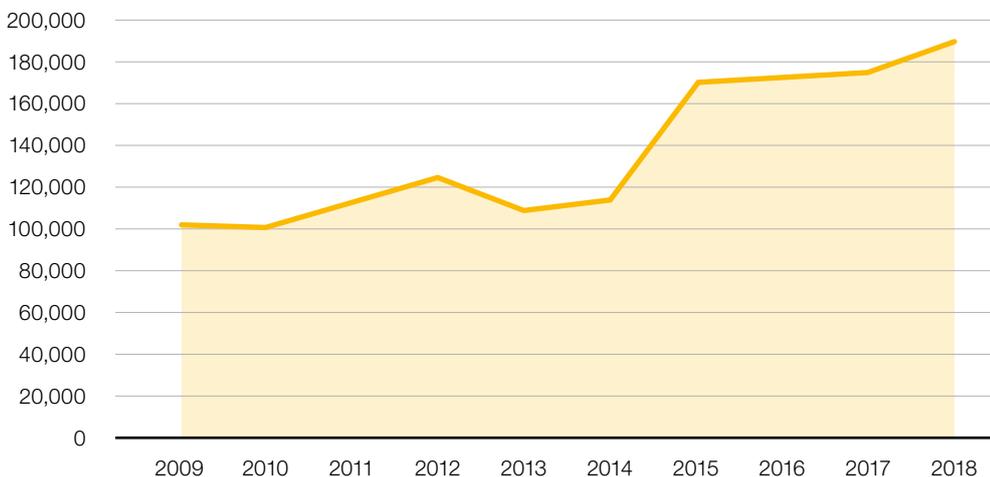
All pensions are at risk of identity fraud where imposters impersonate the real pension holders to claim their benefits. Beyond the pensions sector generally, there is evidence of a rise in identity fraud.

Given some of the potential weaknesses in the counter fraud processes of pension administrators (which will be explored later), combined with the large sums available, the risk of such fraud is high.

There is significant evidence that shows identity fraud has been increasing in prevalence for the last 10 years. Cifas, a fraud prevention service in the UK, produces statistics each year on the number of cases of identity fraud. Cifas define identity fraud as "when a criminal abuses personal data to impersonate an innocent party or creates a fictitious identity to open an account"¹⁴. Their statistics show almost a doubling of this problem during the last decade, as illustrated in figure 1.

13. Association of British Insurers, 2018
14. Cifas, 2019

Figure 1 – Cifas: cases of identity fraud 2009 to 2018



The England and Wales Crime Survey does not ask questions about prior experience of identity fraud. The Scottish Crime Survey, however, does and in the last few years, it has regularly reported 1% of Scots experiencing their identity being stolen for fraudulent purposes¹⁵. If such rates were replicated over the UK as a whole, it would equate to more than 500,000 victims of such a crime. This is not surprising, however, when the means to perpetrate identity related fraud have become more easily available.

Advances in technology have enabled criminals to produce false documents to very high standards. The internet has allowed such technology to be offered widely for sale, as if they were any other consumer product. Passports, driving licences, utility statements, pay statements, bank statements and death certificates are just some of the many fake identity documents that can be easily purchased¹⁶ or in some cases, created at home using over the counter software. The quality of such false documents vary and some may fail to breach the controls of the most important gatekeepers, such as passport control.

However, used against organisations that have not invested in controls to detect such false documents, as many pension schemes and their administrators may not have, they can lead to successful fraud.

The extent of false document production was shown when the Metropolitan Police closed down 'Confidential Access', an organisation which had been selling identity fraud packages. They found 11,000 customers on their database¹⁷.

The security around the production of documents and the features built in to them is often less sophisticated in countries beyond the UK. This provides opportunities for false documents from other countries to be purchased, which are harder to check in the UK, and in some countries for legitimate documents to be issued by corrupt officials. There have been exposés of such behaviour which, although not directly linked to pensions, illustrate the potential risks.

15. Scottish Government, 2017

16. See the joint Crowe and University of Portsmouth report – 'The Dark Web: Bad for Business'

17. Naked Security, 2012

Research has estimated that there are over 1.6 million 'lost' individual pension funds worth around £20 billion.

Case studies

 In 2013, The Sun newspaper, using an undercover reporter, was able to secure a death certificate and an official Indian record of death. Such records are available for as little as £300 from corrupt officials¹⁸.

There have been a number of exposés of attempts to use such documents to commit fraud.

 In Russia in 2010, the wife of the ‘deceased’ presented a Russian death certificate to the British embassy to enable various frauds to take place¹⁹.

 In 2014, a man was jailed for attempting to claim a £1 million life insurance policy using false death certificates from India²⁰.

18. The Sun, 2013

19. Mailonline, 2010

20. Mailonline, 2014

In the European Union alone, there could be almost 340,000 people living and claiming the UK state pension²¹ and, research has suggested there could be over 5.5 million British people living abroad. These pensioners or potential pensioners, are seen by fraudsters as targets, particularly if documents can be easily purchased corruptly or faked in the host country.

It is surprising, that even with the amount of cases that are prevalent, fraud and scams are often at the bottom of a Trustee’s list when it comes to considering risks to their schemes. We found Trustees to place ‘fraud/scams’ as tenth of twelve pension fund risks when surveyed as part of our ‘Managing Pension Governance and Risks Effectively – Risk Management Report 2019’.

Opportunistic pension fraud

Like social security payments and financial services applications, there are also opportunities for legitimate pension holders’ accounts to be used for fraud. For example, there is a significant risk of fraud from the close relatives of a deceased person, who fail to declare their death or falsify details enabling benefits to continue to be claimed.

A report in 2003, estimated 100,000 were claiming the pensions of relations amounting to a £200 million fraud²². There are a number of tools available to match lists of deceased people against those receiving pensions, which have become more commonly used over the last 15 years.

However, an article in *Pensions Age* in 2016, claimed that the “DWP and pension providers bury their heads in the sand over deceased pension fraud” after they refused to answer questions on measures in place to detect this type of fraud²³.

21. ONS, 2017

22. The Telegraph, 2003

23. PensionsAge, 2016

Case studies

🔍 In 2019, a woman was convicted of continuing to claim her father's war pension and other benefits after his death in 2004 amounting to a £740,000 loss²⁴.

🔍 A daughter continued to claim her mother's pension for two years after her death, defrauding the pension scheme of over £7,500²⁵.

Evidence from the National Fraud Initiative (NFI), where details of the deceased are matched against those receiving benefits, also illustrates this continues to be a significant problem. As the relevant government website notes:

“The NFI helped identify 2,910 cases where pensioners had died but payments were continuing, identified by pension schemes. The average pension overpayment, actual plus estimated, was £33,677 (Cabinet Office, 2015).”

The most recent NFI report identified £144.8 million of payments to persons claiming the pensions of dead persons, and in the Civil Service Pension scheme alone £2 million of overpayments were identified²⁶.

24. BBC News, 2019

25. Hull Daily Mail, 2019

26. Cabinet Office, 2018



Incompetent or corrupt pension administrators

Insiders are also a significant risk of fraud (and error) in the administration of pensions. Some of the risk areas include:

- mistakes that enable a cyber-attack to occur
- unlawful disclosure of personal information (such as unclaimed pensions) to third parties by mistake or for the purposes of enabling fraud
- manipulation of records to enable pensioners to receive pension not entitled to
- diversion of payments from legitimate pensioners.

A number of reports have noted the growing problem of internal fraud²⁷, but evidence on the extent of the insider problem is difficult to find for a variety of reasons. It is clear, however, having an appropriate strategy to reduce the risk of insiders is required.

As the Centre for the Protection of National Infrastructure (CPNI) notes:

“As organisations implement increasingly sophisticated physical and cyber security measures to protect their assets from external threats, the recruitment of insiders becomes a more attractive option for those attempting to gain access”²⁸.

27. Cifas, 2019

28. CPNI, n.d.

Cyber-risks

The data pension scheme administrators hold would be very useful to fraudsters. There are a wide variety of risks that emerge as a result of increasing use of digital technologies to administer pension schemes. These include:

- impersonation of legitimate beneficiaries to divert payments
- hacking of systems to alter records for the purpose of fraud
- hacking of systems to secure the personal information of pension holders.

Many organisations are vulnerable to cybercrime, with many high profile examples of financial institutions or related bodies suffering major cyber-breaches. For example, in 2018, Equifax was hacked exposing 143 million accounts worldwide and 400,000 in the UK²⁹. There are many other examples of cybercrime involving sophisticated hackers or corrupt insiders. Any organisation with large amounts of money and sensitive personal data is a potential target for fraudsters.

29. Digital Guardian, 2019

Case study

One example, which illustrates the risk, involved a UK man based in Berkshire who hacked into the Orange County Employee Retirement Scheme in the USA and diverted payments from some members to accounts he had set up in their name. Over £15,000 in pension payments per month were at risk from his fraud³⁰.

30. Newbury Today, 2018

Our 2019 report, 'Managing Pension Governance and Risks Effectively – Risk Management Report 2019' found:



25%

of schemes did not have a plan in place to respond to cybercrime.



33%

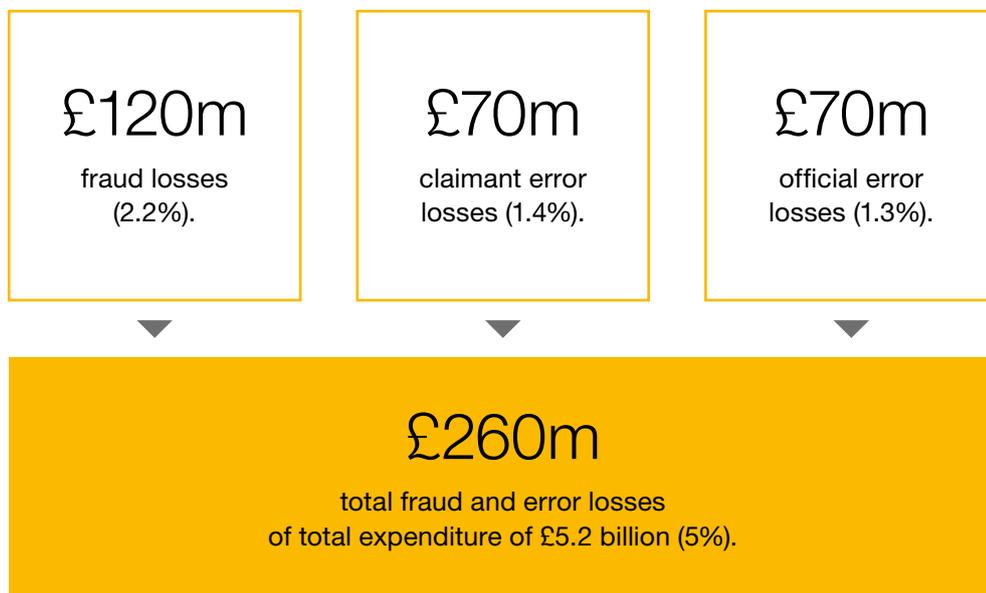
of schemes surveyed had received cybercrime scenario-based training.



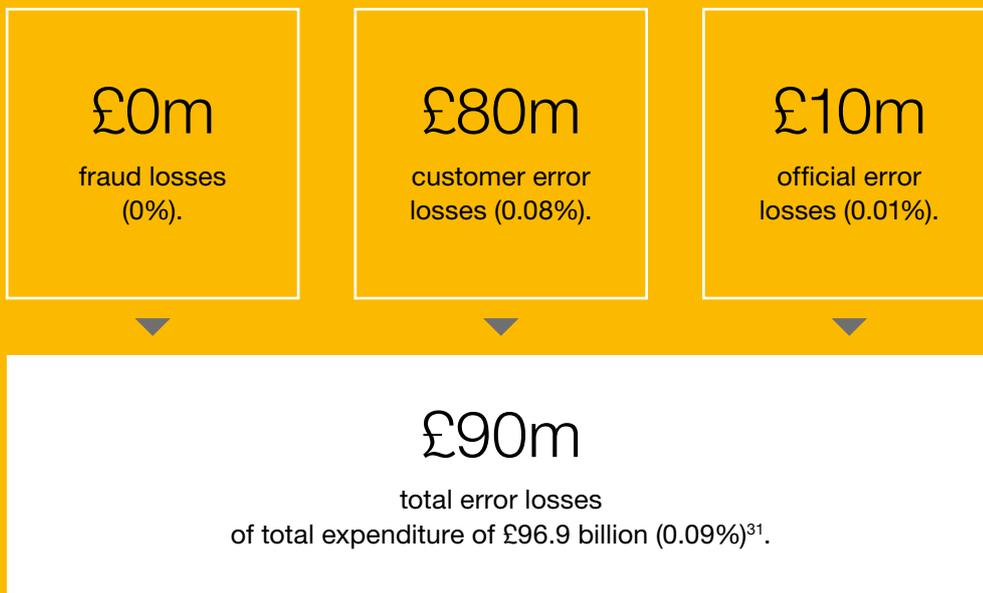
Fraud against state pensions

In the UK, there are two state pensions where there is a risk of fraud (and error). The most recent published estimates (October 2019) indicated estimated losses to be:

Pension Credit

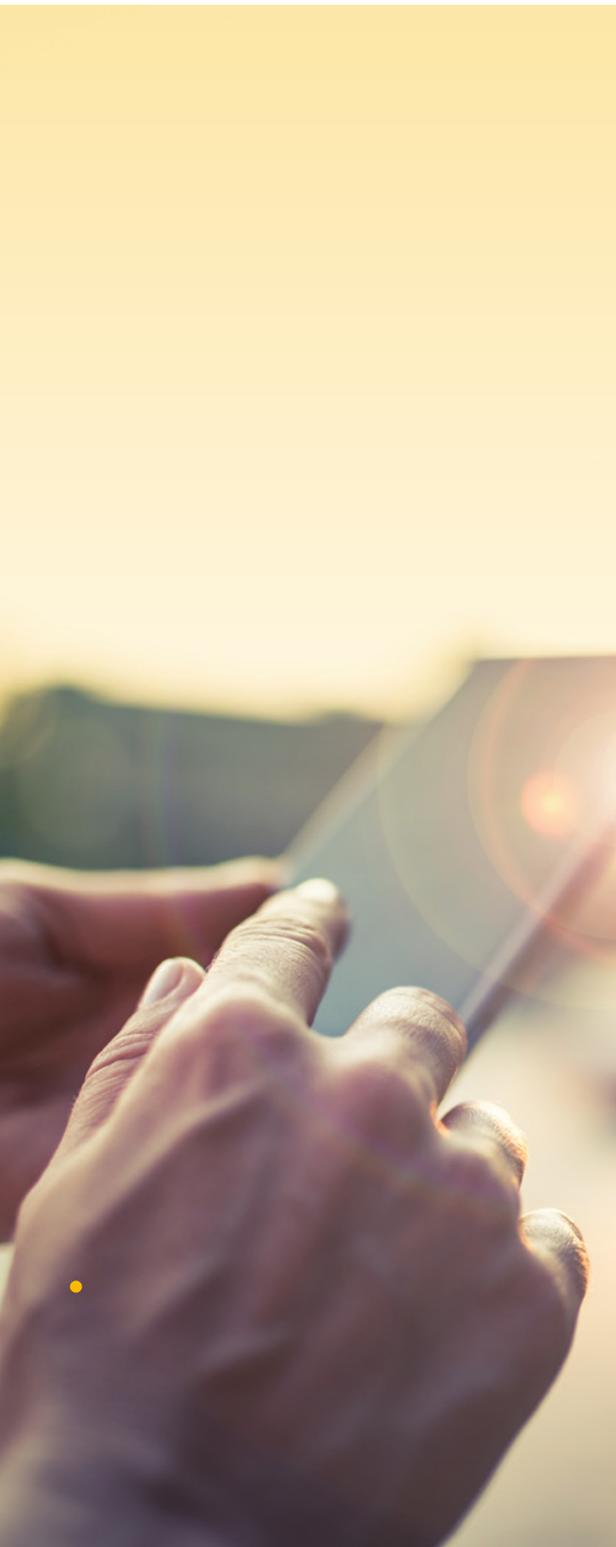


State pension



The state pension shows a fraud rate of zero, and this reflects what the DWP assert to be the very low risk of fraud.

31. DWP, 2019



Pension fraud targeting current and prospective pension beneficiaries

There is also a problem with fraud targeting current and prospective pension beneficiaries. Such fraud can range from the obvious, through to schemes that merely fall significantly below regulatory standards, and are not in the interests of the pension beneficiary, such as some pension liberation schemes. These can be divided between:

- liberation schemes that offer access to a pension before the age of 55. This can result in a large tax bill in addition to the loss of savings
- investment schemes that offer high (unrealistic) returns on overseas investments of pensions
- ‘review’ scams that offer a free review into pension savings and investment returns
- ‘advice scams’ that offer free advice with the aim of obtaining information or authority to transfer a pension or to act as a lead for other pensions scams³².

There have been a wide range of actions pursued by tPR and the police to address this growing problem.

32. Citizen Advice cited in House of Commons Library, 2019, p3

The government's reforms on pensions, allowing greater flexibility in their use, has stimulated a growth in these types of problems. In researching this report, we secured data via Freedom of Information requests from Action Fraud on the number of cases recorded as:

- NFIB 16A Pension Fraud by Pensioners (or their estate)
- NFIB 16B Pension Fraud Committed on Pensioners
- NFIB 16C Pension Liberation Fraud.

These are presented in Table 1. They show a peak in cases in 2015 at 1,353 worth £47 million at an average of £34,000 per case.

Case study

 In October 2018, four men were banned by tPR from being Trustees after duping 245 people out of their pensions in a £13.7 million scam³³.

33. Pensions Regulator, 2018

By 2018, this had declined to 345 cases worth around £14 million, but the average per case had increased to around £40,000.

So, our research reveals an extensive and diverse problem. What is to be done?

Table 1 – National Fraud Intelligence Bureau recorded pension fraud 2014 to 2018

| | 2014 | 2015 | 2016 | 2017 | 2018 | Total |
|-----------------|-------------|-------------|-------------|-------------|-------------|---------------------|
| Number of cases | 1,788 | 1,353 | 548 | 409 | 345 | 4,443 |
| Value | £24,943,719 | £47,322,812 | £22,159,079 | £26,580,061 | £14,106,230 | £135,111,901 |
| Value per case | £13,950.63 | £34,976.21 | £40,436.28 | £64,987.92 | £40,887.62 | £30,410.06 |

Protecting pension schemes properly

The current position

A striking finding in the pensions sector is that the regulator does not set any specific, detailed counter fraud standards for pension administrators.

tPR produces guidance on 'Internal Controls' for providers³⁴. This offers some important guidance on reducing the risk of a variety of problems, which would include fraud. tPR has also produced guidance on cyber security³⁵. Neither of these, however, offer specific guidance on strategies or processes that could address some of the risks in pension fraud that have been identified above. In particular, guidance on some of the preventative measures that could reduce the risk of fraud in this area are absent:

- measures to detect forged, false or altered documents
- data-matching data held against important databases such as deceased, stolen documents, known fraudsters etc.
- screening of staff to identify potential insider threats
- sharing data on known internal and external fraudsters.

The Financial Conduct Authority (FCA) has produced more detailed guidance on the prevention of fraud and related risks in the 'Financial Crime Guide: A firm's guide to countering financial crime risks'³⁶. However, there is still an absence of more detailed preventative advice that could be used, and the guidance is not targeted (or prescribed) for pension administrators (the FCA is more concerned with the sales and marketing of such schemes).

In the absence of clear standards prescribed by regulators, it is important to know how effective pension administrators are in their counter fraud strategies. Unfortunately, there has been limited research in this area, but some that has been conducted has raised cause for concern.

34. <https://www.thepensionsregulator.gov.uk/en/document-library/code-related-guidance/internal-controls-good-pension-scheme-governance>

35. <https://www.thepensionsregulator.gov.uk/-/media/thepensionsregulator/files/import/pdf/cyber-security-principles-for-trustees.ashx?la=en&hash=F8FC2C80923E2625CF37987A78329E4FCD655418>

36. <https://www.handbook.fca.org.uk/handbook/FCG.pdf>

Concerning fraud related to deceased benefits being continued to be paid, one study of pension administrators noted that only 32% of respondents have asked their administrators to amend or extend their processes for pensioner existence tests. Only 24% of respondents had asked their administrators to enhance their tests for members known to be living overseas. Without these improved controls, schemes will be hamstrung in their attempts to crack down on fraudulent claims.

While there have been some positive improvements in recognising fraud as a risk and considering it at a board level, it is unclear the extent to which Trustees who, of course are ultimately responsible, understand the current fraud and cybercrime threats.





Regarding cybercrime resilience, previous research commissioned by tPR concerning Defined Contribution Schemes has highlighted gaps in this area regarding the following three points.

1. Whether the credentials of staff able to access scheme and member records are regularly reviewed.

9-13%

of micro, small, medium and large pension schemes answered no.

67%

of master trusts indicated yes.

33%

of master trusts indicated they didn't know.



2. Whether members with online access to their accounts are required to use a password and encouraged to change it regularly.

7-17%

of micro, small, medium and large pension schemes answered no.

3. Familiarity with Cyber Essentials.

The following firms indicated no awareness³⁷...



37. OMB Research, 2017

This evidence suggests there are probably gaps in the resilience of pension schemes and their administrators to fraud and cybercrime. More needs to be done to raise standards.

Key steps towards better protection

The authors of this report have previously helped many other sectors to better protect themselves against fraud including the UK Local Government and the insurance sector in the 1990s, the NHS in the 2000s and the mining and energy sectors in the 2010s.

In respect of each of these sectors, greater awareness of the nature and extent of the attacks on them spurred beneficial change. In each of these sectors there are common strands of action beyond the essentials like effective audit, which has helped drive change. This section of the report outlines what these should be for the pensions sector.

There are three key areas which have been identified for action and practical examples.

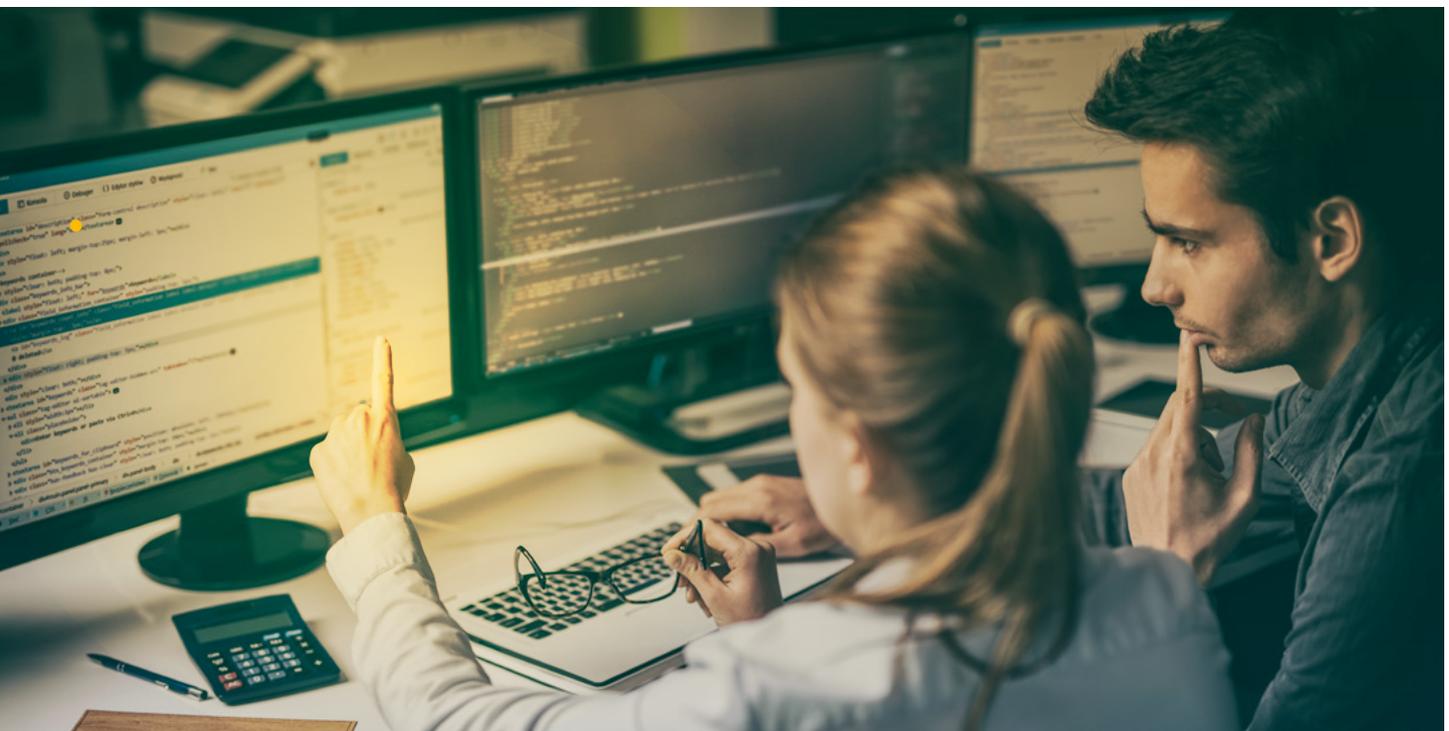
1

Understand the nature and scale of the problem

Fraud is not a marginal or peripheral problem. Across all sectors in the UK it is estimated to cost £190 billion a year. Accurately measured fraud rates across all types of expenditure have risen from 4.6% in 2007 to over 7% a decade later. Cybercrime techniques now allow fraud to be undertaken on an industrial scale. If you don't understand the nature and scale of a problem how can the right, proportionate solution be applied?

What you can do

Work can be undertaken to examine a sample of payments made to check that they have been made correctly, and if problems are found the relevant process or systems weaknesses can be highlighted for remediation.



2

Pre-empt fraud where you can

There is always an honest majority (sadly sometimes passive) and a dishonest minority (sadly often active). It is important to mobilise and involve pensions beneficiaries and to deter, and shrink the size of the dishonest minority (so they believe the risks outweigh the benefits). It is also important to design out the process and systems weaknesses which allow fraud to take place.

What you can do

Work can be undertaken:

- to highlight the issue of fraud to beneficiaries and invite them to scrutinise information which is sent to them about their own pensions
- to publicise new effective anti-fraud arrangements so that potential fraudsters see the risks they face and are deterred
- working closely with the audit function to review existing processes and systems for weaknesses, which could be exploited by fraudsters, and create new, processes and systems so that they are fraud-proofed.

An example of this work would be a Member Benefits Payment Review. After recent examples where beneficiaries have been impersonated to misdirect pension payments, to check the robustness of procedures to verify, identity, address and bank accounts.

3

React when fraud has occurred

Where fraud occurs, a professional objective investigation is needed to determine the truth of what has happened, the extent of losses and how the fraud took place. Sadly, because of under-resourcing the police are unlikely to be able to do this.

What you can do

Access to professional forensic skills can be arranged just as access to legal, accounting or other professional skills. You don't always need them, but it is important to have an arrangement in place that allows a speedy response when you do.

Estimate of the potential cost of pensions fraud in the UK

The first key area for action is true, not just for individual pension schemes but for the sector as a whole.

Understanding the nature and scale of the problem of fraud is essential.

To estimate the potential cost of pensions fraud the researchers obtained data on:

- the value of pensions payments made in the state sector (through the state pension and pension credit)
- the value of public sector pensions payments
- the value of private sector pensions payments
- the value of pension scheme investments each year.

Finally, there is a cost to administering pension schemes and the payments which are made. For example, any provider or administrator of pensions is going to incur payroll costs and purchase services and goods in order to undertake this work, opening up the potential for another type of fraud. The value of this payroll and procurement expenditure was determined.

The researchers then used this data and applied rates of fraud based on prior research relating to the Annual Fraud Indicator³⁸.

An estimate has been produced based on available data. This shows that fraud in the pensions sector could be costing the UK at least £6,171 billion, see Table 2 and the footnotes.

38. The Annual Fraud Indicator was originated by the government's then National Fraud Authority before being continued by academia and the private sector. It was last published in 2017



Table 2 – A prudent estimate of the annual cost of fraud affecting UK pensions

| Estimated fraud rate | | £m | Fraud rate | Fraud £m |
|--|------------|-------------------------|------------|---------------------|
| State pension | Payments | 96,700 ³⁹ | 0.00% | 0 ⁴⁰ |
| State pension credit | Payments | 5,059 ⁴¹ | 2.31% | 120 ⁴² |
| Government and public sector pension | Payments | 38,000 ⁴³ | 3.02% | 1,148 ⁴⁴ |
| Private pension – investment and payment fraud | Investment | 2,885,000 ⁴⁵ | 0.10% | 2,885 ⁴⁶ |
| | Payments | 55,867 | 3.02% | 1,687 ⁴⁷ |
| Private pension – fraud affecting administration costs | Payroll | 2,404 | 1.70% | 41 ⁴⁸ |
| | Purchasing | 6,086 | 4.76% | 290 ⁴⁹ |
| Total | | | | 6,171 |

39. <https://www.gov.uk/government/publications/benefit-expenditure-and-caseload-tables-information-and-guidance/benefit-expenditure-and-caseload-tables-information-and-guidance>

40. DWP (2019) – estimate derived from published measurement exercise

41. <https://www.gov.uk/government/publications/benefit-expenditure-and-caseload-tables-2019>

42. DWP (2019) – estimate derived from published measurement exercise. The ratio of detected v measured losses = 1 : 4.84

43. <https://www.moneywise.co.uk/news/2018-08-28%E2%80%8C%E2%80%8C/public-sector-pensions-triple-size-private-sector-counterparts>

44. AFI (2017) – Public sector pensions fraud rate

45. FCA (2018) ONS – MQ5 – Investment by insurance companies, pension funds and Trusts October to December 2018 and <https://www.fca.org.uk/news/speeches/changing-landscape-fcas-strategic-priorities-pensions-sector>

46. FCA estimate £197 million of investment fraud p.a. / ONS figure for annual business investment in the UK is £196.7 billion = fraud rate of 0.01%

47. AFI (2017) – Fraud rate assumed to be the same as for public sector pensions

48. AFI (2017) – Payroll fraud rate

Conclusion

This report explores the nature and extent of pensions fraud in the UK, highlights the risks of fraud and estimates the total cost of fraud. It also identifies some of the growing risks of internal fraud, identity fraud and cybercrime.

It illustrates some examples of frauds that have been perpetrated against pension schemes and administrators. The report also highlights key steps to strengthen protection against fraud.

Better protection against fraud can limit the risks and reduce the cost. Especially in respect of pensions, it is very difficult to argue that this is not what now needs to be done.

Trustees should take action to ensure that they are prepared for a potential breach, and are aware of the actions that they can take, to mitigate the risks that are facing the pension schemes they are responsible for.





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During more than 25 years as a forensic specialist, Jim has advised Ministers, Parliamentary Select Committees and the Attorney-General, as well as national and multi-national companies, major public sector organisations and some of the most prominent charities. To date he has worked with clients from 41 countries.

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Some of Mark's most significant research projects include leading the research on behalf of the National Fraud Authority and ACPO on fraud victims; the Nuffield Foundation on alternatives to criminal prosecution, the Department for International Development on fraud measurement, Acromas (AA and Saga) on 'Cash-for-Crash fraudsters', the Midlands Fraud Forum and Eversheds on 'Sanctioning Fraudsters'.

Mark has acted as a consultant for the United Nations Office on Drugs and Crime and on Civilian Private Security Services. He also holds the position of Head of Secretariat of the Counter Fraud Professional Accreditation Board and is a former director of the Security Institute. Before joining the University of Portsmouth, Mark was a Research Assistant to the Rt. Hon. Bruce George MP specialising in policing, security and home affairs issues. Mark completed his undergraduate studies at the University of Exeter, his Masters at the University of Warwick and his Doctorate at the London School of Economics.



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Dean has also been involved in carrying out research on behalf of the National Fraud Authority, examining ACPO victims experiences of fraud. In addition to this, he evaluated the effectiveness of CCTV for Portsmouth City Council and carried out a series of Crime Audits commissioned by East Hampshire, Winchester and Isle of Wight Councils.

Furthermore, Dean has worked with a number of police services throughout England and Wales, not only upon improving police relations with minority groups, but towards improving community safety. Dean also served as an advisor to The Equalities Review Panel, Whitehall, London, on designing Crime and Victimization Policy. He graduated from Birmingham City University, before completing his MSc at the University of Portsmouth.



David Shepherd

Researcher, University of Portsmouth

David is a widely published researcher at the Institute of Criminal Justice Studies, University of Portsmouth, where he completed his doctorate. David's research interests include corruption, fraud, cyber-fraud and privacy in the digital era.

David contributed to the Nuffield Foundation research on alternative prosecutions, fraud measurement for DfID, sanctioning fraudsters for the

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The Centre for Counter Fraud Studies, University of Portsmouth

The Centre for Counter Fraud Studies (CCFS) is one of the specialist research centres of the Institute of Criminal Justice Studies, formed in 2009 to accommodate the growing interest in counter fraud that has occurred within the Institute over the last 10 years.

The Centre aims to collate and present the widest possible range of information regarding fraud and the solutions applied to it, and to undertake and publish further research where needed. Additionally, the Centre's Fraud and Corruption Hub gathers the latest thinking, publications, news and research in one central resource for counter fraud professionals.

For more on CCFS visit:

www.port.ac.uk/centre-for-counter-fraud-studies





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