

# "Failure to Prevent Fraud: a New Era?"

## *Solicitors Journal*

### Publications

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By: Joanna Ludlam

Partner Joanna Ludlam authored an opinion piece in *Solicitors Journal* examining the transformative impact of the UK's newly enacted "failure to prevent fraud" offence under section 199 of the Economic Crime and Corporate Transparency Act 2023 (ECCTA), which took effect in September 2025. In her analysis, Joanna highlights how this landmark legislation reshapes compliance obligations, enforcement dynamics, and procurement risk for large organizations operating in or connected to the UK.

"This offence is arguably the most significant development in corporate criminal law since the Bribery Act 2010, fundamentally altering the expectations placed on organisations to proactively prevent fraud within their global operations," said Joanna.

As Chair of the London Public Law and Crisis Management Practice, and Co-Chair of the firm's Global Hearing Preparation and Global Crisis Management and Strategic Risk practices, Joanna brings a unique skill set and steady guidance to clients facing sensitive, high stakes matters. She advises major corporations, regulators, and public bodies on complex issues spanning administrative and public law, contentious regulatory investigations, and corporate crime—often involving bribery, fraud, tax evasion, and anti-money laundering—underpinned by her experience in reputation and risk management.

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