Data Reference	CFA Refs	Fraud Risk Area 1	Fraud Risk Area 2	Fraud Risk Type 3	Fraud Risk Type 4	Local Fraud Risk Descriptor	Risk Owner	Risk Area	Description of Fraud Risk	Description and Assessment of Countermeasures in place	Likelihood of Hazards/Risks causing Harm	Likelihood Rating	Consequence/Severity of Risk materialise	Impact Rating	Current Risk Score	Recommendations to Service	Target Risk Score	Action	Risk Assessment Completed Date	Rik following FPN/WAFN	Next Review
FR01	FR098/FR099/FR101	NHS Supplier	Procurement & Commissioning	Post Contract	False/Inflated/Duplicate Invoices	Purchase of Goods & Services	Keir Warner		1. An individual/supplier (the actor) submits more than one invoice for the same product or service (the action) resulting in a loss to the NHS budget for the value of the duplicate invoice (the outcome) 2. An individual / supplier (the actor) submits a false invoice for a product or service (the action) resulting in a loss to the NHS budget (the outcome) 3. An individual/supplier (the actor) submits false invoices that do not accurately reflect the goods and services provided or contracted to the NHS (the action) resulting in a loss to the NHS Budget (the outcome)	1. Purchasing Order (PO) System in place providing audit trails (GE) 2. Monitoring of Non-Compliant Transactions and Spending (C) 3. Segregation of Duties and Job Rotation (P)	Unlikely	2	Moderate	3	6	1. Suppliers required to provide as much information as possible on invoices to include full breakdown of amount due, VAT, additional fees and discounts (DI). Verification of invoices against information on file (P)	3	Treat	24/03/2023	No	24/09/2024
FR02	FR093/FR097	NHS Supplier	Procurement & Commissioning	Mis-selling/Post Contract	Contract Terms/Changes/Concealed Substitution	Contract Reviews	Keir Warner		1. An individual/supplier (the actor) misleads the NHS into entering a contract, or, the NHS into being charges for products or services they have not agreed to (the action) which results in a loss to the NHS budget (the outcome). 2. An individual/supplier (the actor) makes an unexpected change to a contract, work done, or goods and services supplied whilst attempting to conceal this change (the action) resulting in a loss to the NHS budget and/or gain for themselves (the outcome)	1. Segregation of Duties (P) 2. Contracts register and contract monitoring programme to ensure correct protocols are applied to all contracts (DI & GE)	Rare	1	Major	4	4	1. Education and Awareness to be delivered to all staff working in this stream of the updated data analysis process (C&P) 2. Utilise a risk based approach to monitor and ensure the correct contract management protocols are applied to all contracts (P)	3	Tolerate	24/03/2023	No	24/09/2024
FR03	FR053/FR102	NHS Supplier/NHS Staff	Procurement & Commissioning/NHS Employees	Procurement & NHS - Staff Collusion	Breach of Procurement rules	Contract Splitting	Keir Warner		1. An individual/NHS employee (the actor) intentionally fails to adhere to procurement rules, including contract splitting, the use of accelerated timescales, conflicts of interest and inappropriate authorization (the action) for personal gain resulting in a loss to the NHS budget (the outcome) 2. A NHS employee (the actor) breaches procurement procedures, for example contract splitting or inappropriate authorization (the action), for personal gain (the outcome)	1. Segregation of duties (P) 2. Monthly audits to check repeat orders (DE). 3. Regular checks completed on all orders (high and low value) and on total spend. (DE)	Rare	1	Moderate	3	3	1. Education and awareness detailing process requirements and fraud awareness to be directed at suppliers and contractors utilised by the Health Board (P)	3	Tolerate	24/03/2023	No	24/03/2025
FR04	FR054/FR055/FR054/FR094/FR103/FR104/FR105	NHS Supplier/Staff	Procurement & Commissioning/NHS Employees	Mis-Selling/Procurement & NHS -Staff Collusion	Product Non Existent or Underdeveloped/Bribery/Fake Quotes and Tenders/Rigging Tenders	Due Diligence	Keir Warner		1. An individual (the actor), offers or receives and inducement, gift or hospitality (Bribery), (the action), to dishonestly influence the action(s) of another (the outcome) 2. A NHS employee (the actor), produces false quotes or tenders (the action) for a gain (the outcome) 3. A NHS employee (the actor), affects a tender specification or weighting of a tender evaluation dishonestly (the action), to favour a particular supplier (the outcome) 4. An individual/supplier (the actor) misleads the NHS into entering a contract or the NHS is being charged for products/services that do not exist or are wholly underdeveloped or not in existences (the action) which results in a loss to the NHS budget (the outcome). 5. An individual (the actor) is involved in the offering, giving or receiving of an inducement, gift or hospitality to dishonestly influence another (the action) in order to create a gain resulting in a loss to the NHS budget (the outcome). 6. An individual/supplier (the actor) provides false quotes or tenders in the procurement process (the action) resulting in a potential loss to the NHS budget (the outcome). 7. An individual within an NHS body (the actor), who is involved in the tender process, produces a tender specification or weighting of a tender evaluation to dishonestly favour a particular supplier (the action) resulting in the NHS body not getting true value for the contract awarded due to limiting the potential of others to submit a tender (the outcome).	1.Declarations of Interest are signed by Health Board and Procurement staff annually (P & DE). 2.Declarations of Interest are signed by staff involved in contracting/tendering and single tender/quotation action (GE & P). 3.Robust No PO No PAY policy (P) 4. Validation of banking information & submission of evidence of work completed prior to payment authorisation (P).	Rare	1	Major	4	4	1. Education and Awareness	4	Tolerate	24/03/2023	No	24/09/2024
FR05	FR090/FR091/FR092/FR100	NHS Supplier	Procurement & Commissioning	Contractor Collusion/Post Contract	Bid Rigging/Market Division/Price Fixing/Production/Supply Limitation/False Validation	Fraud by Suppliers	Keir Warner		1. An individual/company (the actor) colludes with other suppliers on bidding on how much they will bid and what they will bid for on NHS contracts (the action) resulting in the NHS not getting true value for the services/goods supplied (the outcome). 2. An individual/supplier (the actor) involved in a procurement process conspires with others to agree the price that a particular product, works or service will be sold for to the NHS (the action) resulting in a loss to the NHS budget as the NHS may have been overcharged (the outcome). 3. An individual/supplier (the actor) deliberately restricts the levels of supply to NHS bodies in an attempt to increase the price charged (the action) resulting in a loss to the NHS budget of the increased value (the outcome). 4. An individual/supplier (the actor) has dishonestly presented information certifying that work done meets agreed standards (the action) resulting in the NHS paying for a service that does not meet the standard required or was agreed in advance (the outcome).	1. Suppliers sign declarations prior to working with health board (P & DE). 2. Segregation of Duties (P & DI). 3. Regular review of staff permissions (P) 4. Validation checks around any supplier requested changes (P)	Unlikely	2	Major	4	8	1. Audits re current staff and staff permissions 2. Audits of suppliers information and work completed. 3. D&A checks. 4. Pre-Qualification Questionnaire to determine capability & capacity/testimonials	6	Treat	24/03/2023	No	24/09/2023
FR06	FR049	NHS Staff	NHS Employees	Employee Insider Issues	Charity Funds	Charitable Funds		Finance	A NHS employee (the actor), breaches procedures relating to charitable funds (the action), and diverts monies intended for the fund for personal gain (the outcome)											
FR07	FR123	Third Parties	Usage Fraud	Plastic Card		Credit Card		Finance	An individual / third party outside the NHS (the actor) illegally uses a credit/debit/government procurement card (the action) resulting in a loss to the NHS budget (the outcome)											
FR08	FR115	Third Parties	Payment Fraud	Mandate Fraud		External Mandate Fraud		Finance	An individual/third party (the actor) outside of the NHS requests a change of bank account details in respect of an NHS Supplier (the action) with the intention to divert payments made by standing order, direct debit or bank transfer resulting in a loss to the NHS budget (the outcome)											
FR09	H-002-22	Third Parties	Payment Fraud	Mandate Fraud	Cyber	Cyber Enabled Mandate Fraud		Finance	An individual/third party (the actor) outside of the NHS utilising phishing and social engineering techniques to gain access to data and systems and make changes to key information in order to facilitate a request to change of back account details in respect of an NHS supplier (the actor) with the intention to divert funds resulting in a loss to the NHS budget (the outcome)		Unlikely	2	Major	4	8		8	Treat	01/09/2022		01/03/2023
FR10			Finance			Overpayment of Salary			This is where an employee receives payment of salary when not entitled to those payments. This could be when the employee has left employment and continues to be paid or who has inflated pay and continues to receive the inflated rate.											
FR11	FR001/FR002	NHS Patients	Overseas	European Health Insurance Card (EHIC)	False Application/False Use	Overseas European Health Card	Not a Health Board Risk		1. A patient/individual (the actor) has intentionally made a false application for a European Health Insurance Card (the action) resulting in a loss to the NHS budget for services provided (the outcome) 2. A patient/individual (the actor) has intentionally made use of a European Health Insurance card for which they were not entitled to (the action) resulting in a loss to the NHS Budget (the outcome)	Not a Health Board Risk	N/A	0	N/A	0	0	Not a Health Board Risk	0	N/A	26/04/2023	N/A	26/04/2025
FR12	FR003/FR004/FR005	NHS Patients	Overseas	Secondary Care	NHS Billing/NHS Staff Facilitation	Overseas Private Patient			1. An individual (the actor) working within general practice dishonestly charges or deliberately fails to charge overseas patients for treatment received at a general practice (the action) resulting in loss to the NHS budget or for personal gain to the individual (the outcome) 2. A NHS trust (the actor) charges the NHS for services provided to an overseas patient which should have been chargeable by the patient (the action) resulting in a loss to the NHS budget (the outcome). 3. An individual (the actor) who is an NHS employee is deliberately facilitating patients from overseas to seek care on the NHS without paying (the action) resulting in a loss to the NHS budget of the charges not collected from those overseas patients (the outcome)											
FR13	FR014	NHS Patients	Patient	NHS Additional Funding	Travel Costs	Patient Fraud - Travel Costs			A patient/individual (the actor) has claimed for NHS funding for travel to hospital (the action) for which they were not entitled too resulting in a loss to the NHS budget of the costs claimed (the outcome)											
FR14			Finance			Petty Cash		Finance	Using petty cash to fund unauthorised activities which are not in line with the NHS organisation's policy. Unrestricted access to the petty cash fund. Failing to validate a patient's entitlement prior to approving a reimbursement. Failing to verify the identity of the patient claiming a reimbursement											
FR15			Finance			Payment Terminal														
FR16	FR060	NHS Staff	NHS Employees	Income Hours	Timesheet/Overtime	Falsified Timesheet/Overtime		Workforce	A NHS employee (the actor), inputs incorrect falsified details onto a timesheet or falsifies a signature (the action) for personal gain (the outcome)		Possible	3	Minor	2	6		4		10/09/2021		10/03/2023
FR17	FR045/FR059/FR061	NHS Staff	NHS Employees	Income Hours/Employee Declarations	Working elsewhere/Sickness Certificate	Working Elsewhere & Working Elsewhere whilst sick		Workforce	1. A NHS employee (the actor), uses a false sickness certificate (the action) to support time taken off work (the outcome) 2. A NHS employee (the actor), reports sick when they are actually fit for work. For example this could relate to working elsewhere whilst sick (the action), for personal gain (the outcome) 3. A NHS employee (the actor), works elsewhere whilst employed and being paid for by the NHS during their NHS time (the action) for personal gain (the outcome)		Possible	3	Moderate	3	9		6		01/09/2021		01/03/2022
FR18	FR058	NHS Staff	NHS Employees	Income Hours	Leave	Leave		Workforce	A NHS employee (the actor), fabricates records and or falsifies authorization (the action) to obtain more leave than they are entitled to (the outcome)		Unlikely	2	Minor	2	4		2		01/09/2021		01/03/2023
FR19	FR063	NHS Staff	NHS Employees	Travel Subsistence		Employee Fraud - Expenses		Workforce	A NHS employee (the actor), dishonestly claims for travel, subsistence or other expenses they are not entitled to the action) for personal gain (the outcome)		Unlikely	2	Negligible	1	2		2		03/09/2021		03/09/2023
FR20	M-005-19	Third Parties	Payment Fraud	Salary Diversion	Cyber	Cyber Enabled Salary Diversion		Cyber Security	An individual/third party (the actor) outside of the NHS targets NHS employees utilising phishing and social engineering techniques to gain access to data and systems in order to facilitate a change to the employees bank accout details (the action) with the intention to divert the employees salary for their own personal gain (the outcome)	All Wales Information Governance Policy - Section 5.2, All Wales Information Security Policy - Section 5.1.2, Cyber Security Policy - Sections 8 & 11 • ESR system issues an email to users when key details are changed on ESR to help users identify instances where their account may have been compromised. • Users can only update Bank Details on a device that is connected to the NHS Network.• Cyber Security block spurious emails and the IP addresses preventing them repeatedly entering the Health Board Systems. • Phishing exercises carried out by Cyber Security to promote awareness of cyber attacks. • Regular Communication and Alerts to staff warning of Cyber Security Risks	Possible	3	Minor	2	6	Maintain existing controls and protocols. • Issue specific alerts around Cyber Security Risks• Introduction of One Time Password or Two Factor authentication will mitigate the risks further. This security feature is being considered but there is currently not a date for delivery	4	Tolerate	14/02/2023		14/08/2024
FR21	M-006-19	NHS Staff	NHS employees	Community Services	Death	Continence Services & Products			A Nursing/Residental Home (the actor), deliberately fails to update NHS Systems of the death of a patient requiring continence products (the action) with further supplies being ordered and supplied,resulting in a loss to the NHS budget (the outcome)		Probable	4	Moderate	3	12	Issue letters reminding Residental Homes to inform Just Wales Ltd and Continence Service of when a patient passes away. Remind residential homes to return any unused continence product. Continence Service to undertake spot-checks on re-orders submitted by Residential Homes.	6	Treat	18/06/2021		18/12/2021
FR22	FR116	Third Parties	Payment Fraud	Unsolicited Requests		Unsolicited Requests			An individual/third party (the actor) requests payment from the NHS where no contract or payment obligation exists (the action) resulting in a loss to the NHS budget (the outcome)		Possible	3	Minor	2	6		2	Treat	15/09/2021		15/03/2023
FR23			Maternity Services			Midwifery on call														
FR24	FR006/FR007/FR008/FR009/FR010/FR011/FR019/FR020	NHS Patients	Patients	Misuse of Prescriptions/Services/Drugs	Lost/Multi-Registration/Obtained for another/Stolen/Used by Someone else/Altered/Amended/Counterfeit/False Symptoms	Patient Fraud - Misuse of Prescriptions & Services			1. A patient/individual(the actor) dishonestly reports that a NHS prescription form has been lost (the action) resulting in a replacement being issued at a loss to the NHS budget of the value of the medications prescribed (the outcome). 2. A patient/individual (the actor) could register at different practices using their own identity or an alias, to obtain excess NHS medication or services (the action) resulting in a loss to the NHS budget for the costs of medication falsely claimed (the outcome). 3. A patient/individual (the actor) obtains NHS medication and forwards it to someone else, including selling, exchanging or sending abroad (the action) resulting in a loss to the NHS budget (the outcome). 4. A patient/individual (the actor) has stolen a NHS prescription form(s)(the action) resulting in a loss to the NHS budget for the medication prescribed on it (the outcome) 5. A patient/individual (the actor) has used NHS prescriptions that have been prescribed for another person (the action) resulting in a loss to the NHS budget of the value of the prescribed medication (the outcome). 6. A patient / individual (the actor) misleads a NHS service provider with false / incorrect information (the action) in order to obtain NHS services for which they were not entitled, resulting in a loss to the NHS budget (the outcome) 7. A patient/individual (the actor) falsified a genuine prescription in some manner (the action) for personal gain (the outcome). 8. A patient/individual (the actor) produces a counterfeit prescription (the action) with the intent to deceive (the outcome)											
FR25	FR041/FR042/FR043/FR044/FR046/FR047/FR048	NHS Staff	NHS Employees	Employee Declarations	Criminal Convictions/CV/Right to work in UK/Impersonating a Medical Professional/Counterfeit Documents/Forged Documents/Fraudulently obtained genuine documents	Employee Fraud - Recruitment	Richie Howorth - Assistant Head of Recruitment	Workforce	1. A NHS employee (the actor), fails to declare a criminal conviction in line with the Rehabilitation of Offenders Act 1974 (the action) to gain or continue employment that may otherwise not be the case (the outcome). 2. A NHS employee (the actor), deliberately provides false information on their CV. This may include fictitious details of qualifications, experience or skills (the action), in order to gain employment (the outcome). 3. A NHS employee (the actor), falsely presents themselves as a qualified medical professional (the action) for personal gain (the outcome) 4. A NHS employee (the actor), uses false information or false documents in their real name (the action) to support their right to work in the UK (the outcome) 5. A NHS employee (the actor), provides counterfeit identity documents with the intent to deceive (the action), for personal gain (the outcome) 6. A NHS employee (the actor), produces genuine identity documents that have been adapted or altered (the action), with the intent to deceive (the outcome) 7. A NHS employee (the actor), provides genuine documents such as passports or driving licenses that have been obtained using false information (the action) for personal gain (the outcome)		Possible	3	Catastrophic	5	15		10	Treat	01/06/2023	No	01/09/2023

FR26			WOD			Volunteers			Volunteers are not on ESR due to not being paid employees and therefore currently do not use the SGL. Millage is worked out by an individual. Currently volunteers are not attending the fraud awareness training sessions or being given the fraud or benefits in kind policys. Volunteer Team members not received recent Pre-Employment Checks training.		Possible	3	Moderate	3	9		6	Treat	10/11/2020		10/05/2021
FR28	FR017/FR018	NHS Patients	Patient	Registration Details	Registered Identity/Address False	Patient Fraud - Registration			1. A patient/individual (the actor) use the identity of another person for the purposes of registering as an NHS patient to access NHS services (the action) resulting in a loss to the NHS budget of the value of the NHS services provided (the outcome) 2. A patient/individual (the actor) has registered for NHS services using an address where they are not a resident (the action) resulting in a loss to the NHS budget of the value of the NHS services provided (the outcome)											
FR29	FR032/FR033/FR034	NHS Staff	Dentist or Dental Practice	Dental Contract/Income	Dental Activity/Patient Claims/Double Income	Dental Contractor Fraud			1. A dentist or dental practice (the actor), makes false claims under the NHS dental contract including additional claims, enhancement to claims or splitting treatment courses (the action) for financial gain (the outcome) 2. A dentist or dental practice (the actor), make false claims relating to patients. For example the patient did not attend on the day or never attended or the patient does not exist or was deceased (the action) for financial gain (the outcome) 3. A dentist or dental practice (the actor), submits claims for a patients treatment who have already paid privately (the action) for financial gain (the outcome)											
FR30	FR073/FR074/FR075/FR076	NHS Staff	Optical Practitioner or Practice	Optical Practice	Double Income/Enhanced Claims/False Claims/Testing/Dispensing	Optical Practitioner Fraud			1. An optical practice (the actor), submit claims for a patients treatment who have already paid privately (the action), for financial gain (the outcome). 2. An individual/provider of services (the actor), submits false or enhanced claims for payment to the NHS (the action), resulting in a loss to the NHS budget (the outcome) 3. An individual/optical services provider (the actor), submits false claims. This includes claims submitted where the patient did not actually attend on the day, the patient never attended, the patient does not actually exist, or the patient was deceased at the time for which the treatment was claimed (the action) resulting in a loss to the NHS budget (the outcome) 4. An individual/service provider (the actor), is involved with the dispensing and testing of optical equipment, including unnecessary early recall of patients, dispensing without clinical justification and the dispensing of optical devices and lenses (the action) resulting in a loss to the NHS budget (the outcome)											
FR31	FR069/FR070/FR071/FR072	NHS Staff	Optical Practitioner or Practice	Domiciliary	Double Income/Enhanced Claims/False Claims/Testing/Dispensing	Domiciliary Optical Practitioner Fraud			1. An optical practice (the actor), submit claims for a patients treatment who have already paid privately (the action), for financial gain (the outcome). 2. An individual/provider of services (the actor), submits false or enhanced claims for payment to the NHS (the action), resulting in a loss to the NHS budget (the outcome) 3. An individual/optical services provider (the actor), submits false claims. This includes claims submitted where the patient did not actually attend on the day, the patient never attended, the patient does not actually exist, or the patient was deceased at the time for which the treatment was claimed (the action) resulting in a loss to the NHS budget (the outcome) 4. An individual/service provider (the actor), is involved with the dispensing and testing of optical equipment, including unnecessary early recall of patients, dispensing without clinical justification and the dispensing of optical devices and lenses (the action) resulting in a loss to the NHS budget (the outcome)											
FR32	FR024/FR028/FR031	NHS Staff	GP or GP Practice	GP/GP Practice	Capitation Figures/False Claims/Treatment records/Claims	GP Misrepresentation of Patient Lists and False Claims			1. A GP or GP Practice (the actor), deliberately makes a misrepresentation of patient list size and/or demographics by health care provider (the action), in order to attract higher core funding (the outcome) 2. An individual/general practice (the actor) submits false claims for allowances, expenses or grants which are not related to patient care (the action) resulting in a loss to the NHS budget (the outcome). 3. A GP (the actor), falsely claims for treatment delivered or treatment targets (the action) for financial gain (the outcome)											
FR33			Mortuary Services			Mortality			Mortuary Assistants and staff members involved in the hospital mortuary process where they are being paid cash-in-hand amounts by Funeral Directors for the bodies to be washed, cleaned, dressed and prepared for funerals due to lack of capacity in funeral homes, during their contracted NHS hours. A private fee is paid to doctors in order to complete the certificate.		Expected	5	Minor	2	10		1	Treat	17/02/2021		17/08/2021
FR34	FR012/FR013	NHS Patients	Patient	NHS Additional Funding	Funded Healthcare/Payment in Lieu	Patient Fraud - NHS Additional Healthcare Funding			1. A patient/individual (the actor) dishonestly obtained funding for a package of care provided by the NHS to meet ongoing healthcare needs outside a hospital setting (the action) resulting in a loss to NHS budget (the outcome) 2. A patient/individual (the actor) who receives direct payments for healthcare, usually paid via an NHS personal health budget, that they are not entitled to (the action) which results in a loss to the NHS budget (the outcome)											
FR35						Patient Fraud - Mental Health & Childrens															
FR36	FR016/FR107/FR108	NHS Systems	Financial Reporting	Payment by Results (PbR)	Billing for Services not rendered/Double Billing/Up-Coding/Over-Coding	Financial Fraud - Payment by Results	Not a Health Board Risk		1. An individual/supplier (the actor) bills the NHS for medical treatment or for equipment that hasn't been provided (the action) resulting in a loss to the NHS budget (the outcome) 2. An individual/NHS body/Supplier (the actor) invoices a NHS body for the treatment of patients who are private patients and have paid privately (the action) resulting in a loss to the NHS budget (the outcome) 3. An individual/NHS body (the actor) deliberately falsifies treatment codes (the action with the intention of attracting a higher value payment (the outcome).	Not a Health Board Risk	N/A	0	N/A	0	0	Not a Health Board Risk	0	N/A	26/04/2023	N/A	26/04/2025
FR37	FR109	NHS Systems	Financial Reporting	Pevense Incentives		Financial Fraud - Pevense Incentives		Finance	An individual/supplier (the actor), abuses a payment scheme, where the objectives of the NHS or the interests of the patient are being exploited, in favour of the incentive (the action) resulting in a loss to the NHS budget											
FR38	FR035/FR034/FR037/FR038/FR039	NHS Staff	NHS Employees	Bursary Training	Childcare/Expenses/False Information/Household Arrangements/Identity	Employee Bursary/Training Fraud	Not a Health Board Risk		1. A NHS employee (the actor), provides false information about their childcare arrangements or responsibility for children (the action), in order to obtain a NHS bursary (the outcome) 2. An individual/third party (the actor) makes dishonest claims for expenses such a travel or other expenses in connection with an NHS bursary (the action) resulting in a loss to the NHS budget (the outcome) 3. A NHS employee (the actor), provides false information for example, false qualifications (the action) to obtain a bursary payment (the outcome) 4. A NHS employee, provides false information about their household income, living arrangements, including residency in the UK (the action) in order to obtain an NHS bursary (the outcome) 5. A NHS employee (the actor), uses false identity or provides false documents in the support of an identity (the action) in order to obtain an NHS bursary (the outcome)	Not a Health Board Risk	N/A	0	N/A	0	0	Not a Health Board Risk	0	N/A	26/04/2023	N/A	26/04/2025
FR39	FR077/FR078/FR079	NHS Staff	Pharmacist or Pharmacy	Abuse of Contract	Contract Balancing/False Claims/Parallel Imports/Exports	Pharmacy - Abuse of Contract			1. A pharmacy or pharmacist (the actor), contravenes their contract buy either selling medicines abroad or buying medicines from overseas at a lower cost for NHS dispensing (the action) for financial gain (the outcome). 2. An individual / pharmacist (the actor), submits false claims for allowances, expenses, payments or grants not directly related to the care of specific patients (the action), resulting in a loss to the NHS budget (the outcome) 3. A pharmacy or pharmacist (the actor), contravenes their contract buy either selling medicines abroad or buying medicines from overseas at a lower cost for NHS dispensing (the action) for financial gain (the outcome)											
FR40	FR080/FR081/FR082/FR083/FR084/FR085	NHS Staff	Pharmacist or Pharmacy	Dispensing/Services Fraud	Dispensing Counterfeit Medicines/Dispensing Irregularities/Dispensing Re-issued Medicines/Double income/Ghost Patients/Patient Services	Pharmacy - Dispensing/Services Fraud			1. A pharmacy or pharmacist (the actor), dispenses counterfeit goods (the action), for financial gain (the outcome) 2. A pharmacy or pharmacist (the actor), dispenses prescriptions not as claimed. For example the pharmacist dispenses a lower quality or strength of medication or added an item that was not dispensed (the action), for personal gain (the outcome) 3. A pharmacy or pharmacist (the actor), dispenses reissued medicines to another patient that are out of date, redundant or a split pack (the action) for personal gain (the outcome) 4. A pharmacy or pharmacist (the actor), makes a false claim from the NHS for prescriptions dispensed to patients who have already paid the NHS charge themselves (the action), for financial gain (the outcome) 5. A pharmacy or pharmacist (the actor), makes a false claim for patients who did not attend on the day or had never attended, do not exist or were deceased at the time the treatment was claimed (the action), for personal gain (the outcome) 6. A pharmacy or pharmacist (the actor), makes false claims for a payment in relation to patient services (the action) for financial gain (the outcome)											
FR41	FR087/FR088/FR089	NHS Staff	Pharmacist or Pharmacy	Market Abuse	Patent/Price Fixing/Supply Limitation	Pharmacy Fraud - Market Abuse			1. A pharmaceutical company (the actor), increases the patent length of a particular medicine to prevent competition (the action), for financial gain (the outcome) 2. An individual(s) or company in the pharmaceutical supply chain (the actor), agree to fix prices on medicines or groups of medicines (the action) for financial gain (the outcome) 3. A pharmacy / pharmacist or pharmaceutical company (the actor), deliberately restrict the supply of medicines (the action) to inflate prices for financial gain (the outcome)											
FR42	FR086	NHS Staff	Pharmacist or Pharmacy	Inflated Costs	Inflated Costs	Pharmacy Fraud - Inflated Costs			A pharmacy or pharmacist (the actor), inflates fees, allowances and reimbursements claimed under the Drug Tariff (the action), for financial gain (the outcome)											
FR43	FR021/FR040	NHS Staff/Patients	NHS Employees/Patients	Employee Declarations/Additional Funding	Compensation Claim	Compensation Claims			1. A patient / individual (the actor) lies or provides false information (the action) in order to claim compensation from the NHS (the outcome) 2. A NHS employee (the actor), dishonestly misrepresents a set of circumstances (the action), in order to obtain a compensation claim (the outcome)											
FR46	FR062	NHS Staff	NHS Employees	Recruitment Process	Undue Influence	Employee Fraud - Undue Influence around recruitment		Workforce	A NHS employee (the actor), unduly influences the recruitment process. For example a family member or friend serving on the interview panel (the action), for personal gain (the outcome)											
FR47	FR050/FR051/FR052	NHS Staff	NHS Employees	Employee Insider Issues	Ghost Employees/Improper Payments/NHS Assets	Employee Fraud - Insider Issues		Workforce	1. A NHS employee (the actor), uses their access to, or knowledge of, NHS records and systems to add false details to personal records on payroll for example retaining the details of an individual after the employee has left, (the action), for personal gain (the outcome) 2. A NHS employee (the actor), uses their knowledge or access to make illicit payments for instance, by creating bogus customer records, interfering with cheques or misusing procurement cards (the action) for a gain (the outcome). 3. A NHS employee (the actor), uses NHS property, such as data, systems, medical and non-medical equipment, vehicles, consumables and supplies for a non NHS purpose (the action) for personal gain (the outcome)											
FR48	FR025/FR027/FR039	NHS Staff	General Practitioner (GP) or GP Practice	GP/GP Practice	Conflicts of Interest/Diversion of Global Sum/Inducements	GP Fraud - Commissioning and Funding			1. A general practitioner (s), (the actor), make decisions relating to commissioning influenced or impaired by a personal interest, role or relationship (the action), for personal gain (the outcome) 2. A general practitioner (s), (the actor), diverts core funding payments from their intended use (the action) for financial gain (the outcome) 3. A general practitioner (s), (the actor), request and or accept inducements to influence decisions about registering, prescribing, treating or referring patients or commissioning services for patients (the action) for personal or financial gain (the outcome)											
FR49	FR026/FR030	NHS Staff	General Practitioner (GP) or GP Practice	GP/GP Practice	Disposal of NHS Drugs/Prescribing	GP Fraud - Medicine Management			1. A general practitioner (s), (the actor), disposes of drugs without authorisation (the action), for personal gain (the outcome) 2. A general practitioner (s), (the actor), undertakes unlawful prescribing. For example prescribing to patients who do not exist or are self prescribing (the action) for personal gain (the outcome)											
FR50	FR023	NHS Staff	GP Practice Employees	GP Practice Employees	Diversion of Funds	GP Employees - Diversion of Funds			A general practice employee (the actor), diverts funds (the action) for personal gain (the outcome)											
FR51	FR064/FR065	NHS Staff	NHS Pensioners	Administration	Theft of Funds/Withholding Funds	NHS Pensions - Theft/Unlawful Retention		Workforce	1. An individual (the actor) is involved with NHS pension funds being diverted elsewhere with the intention of stealing the funds (the action) resulting in a loss to the NHS budget (the outcome) 2. An individual (the actor), is involved with NHS pension payments which are deliberately not paid with the intention of using this money in the short, medium or long term to increase liquidity (the action), resulting in a loss to the NHS budget (the outcome)											
FR52	FR066/FR067/FR068	NHS Staff	NHS Pensioners	Member Accounts	Death/Health/Survivor	NHS Pensions - Failure to inform of change of circumstances	Not a Health Board Risk		1. A NHS pensioner or beneficiary of an NHS pension or an individual (the actor), deliberately fails to inform the NHS of the death of a pensioner or a survivor (the action) for financial gain (the outcome). 2. A NHS pensioner or beneficiary of an NHS pension (the actor), lies about the state of health of a pensioner (the action) for financial gain (the outcome) 3. A beneficiary of an NHS pension (the actor), deliberately fails to notify a relevant change in circumstances (the action) for financial gain (the outcome)	Not a Health Board Risk	N/A	0	N/A	0	0	Not a Health Board Risk	0	N/A	26/04/2023	N/A	26/04/2025

FRG3	FR110/FR111/FR112/FR113/FR114	NHS Systems	Performance Reporting	Data Manipulation/False Accounting	A&E waiting times/Emergency Service response times/False Accounting/Hygiene/Infections and patient safety/Performance Indicator	NHS Systems - Manipulation & False Accounting			1. An individual / NHS body (the actor) deliberately falsifies the recording of NHS data in respect of A&E waiting times, to inaccurately reflect performance (the action) resulting in a loss to the NHS budget (the outcome) 2. An individual / NHS body (the actor) deliberately falsifies the recording of NHS data in respect of emergency service times to inaccurately reflect performance (the action) resulting in a loss to the NHS budget (the outcome) 3. An individual / NHS body (the actor) deliberately overstates the performance of assets and / or of liabilities, with the intention of appearing financially stronger or better performing (the action) resulting in a potential loss to the NHS budget (the outcome) 4. An individual / NHS body (the actor) deliberately falsifies the recording of hygiene, infection and or patient safety data to inaccurately reflect performance (the action) resulting in a loss to the NHS budget (the outcome) 5. An individual / NHS body (the actor) deliberately falsifies key performance indicators that measures other aspects of delivery of a service (the action) resulting in a loss to the NHS budget (the outcome)												
FRG4	FR015/FR016/FR022	NHS Patients	Patients	Patient Charge Evasion	Optical/Prescription/Dental	Patient Fraud - Evasion of Payment of Charges		Finance	1. A patient (the actor) dishonestly evades payment of chargeable NHS costs (the action) resulting in a loss to NHS budget which should have been paid by the actor (the outcome) 2. A patient (the actor) dishonestly evades payment of chargeable NHS costs (the action) resulting in a loss to NHS budget which should have been paid by the actor (the outcome) 3. A patient (the actor) dishonestly evades payment of chargeable NHS costs (the action) resulting in a loss to NHS budget which should have been paid by the actor (the outcome)												
FRG6	FR095/FR096	NHS Supplier	Procurement & Commissioning	Personal Gain	Business Use/Personal Use	Purchase or Use of NHS goods for Personal Gain			1. An individual (the actor) makes use of NHS supplies for their private medical work or has purchased goods using NHS funds with the intention of selling them for personal gain (the action) resulting in a loss to the NHS budget (the outcome) 2. An individual (the actor) has purchased goods using NHS funds with the intention of selling them for personal gain (the action) resulting in a loss to the NHS budget (the outcome)												
FRG7	FR117/FR122/FR124	Third Parties	Usage Fraud	Cheque/NHS Data/Telecoms		Third Party Fraud - Illegal use of Information/Services		Finance	1. An individual /third party outside the NHS (the actor) illegally uses NHS cheques (the action) resulting in a loss to the NHS budget (the outcome) 2. An individual / third party (the actor) has obtained NHS data illegally (the action) resulting in the data obtained being used fraudulantly causing a loss to the NHS (the outcome) 3. An individual (the actor) is involved in using NHS telecoms airtime when they do not have the authority to do so (the action) resulting in a loss to the NHS budget (the outcome)												
FRG8	FR118/FR119/FR120/FR121	Third Parties	Usage Fraud	Grant Funding	Bribery/False Information/Staff Collusion/Used for another purpose	Third Party - Grant Funding		Finance	1. An individual (the actor) is involved in giving or receiving an inducement, gift or hospitality in order to influence the funding process of a grant (the action) resulting in a loss to the NHS budget (the outcome) 2. An individual (the actor) is a recipient of a grant or funding by the NHS and has provided false or misleading information to secure the funding (the action) resulting in a loss to the NHS budget (the outcome) 3. An individual (the actor) who is responsible for awarding the funding of a grant. Colludes with the recipient and /or colleagues to award grant funding dishonestly (The action) resulting in a loss to the NHS budget (the outcome) 4. An individual / business (the actor) who is in receipt of funding through an NHS grant diverts the funds elsewhere or does not use them in line with the terms of the agreement (the action) resulting in a loss to the NHS budget (the outcome)												
FRG9	FR057	NHS Staff	NHS employees	Income/Hours	Income Inflation	Staff Fraud - Income Inflation	Not a Health Board Risk		A NHS employee (the actor), falsifies their income figure (the action), in order to inflate their income paid as a bonus, commission or other reward based income (the outcome)	Not a Health Board Risk	N/A	0	N/A	0	0	Not a Health Board Risk	0	N/A	26/04/2023	N/A	26/04/2025
FRG0	H-005-23	NHS Staff	NHS Employees	Employee Declarations	False International English Language Testing System Certificates (IELTS)	Employee Fraud - False International English Language System Certificates (IELTS)			A NHS employee (the actor) provides a false international English Language Testing System Certificate (IELTS) with the intent to deceive (the action), for personal gain (the outcome)												