

COUNTER FRAUD WORK PLAN 2020/21 – V2

INFORM AND INVOLVE

	TASK/OBJECTIVE	PROPOSED DELIVERY
1	Design and deliver a programme of work to raise economic crime awareness amongst staff at all levels within the Health Board, with the aim of ensuring that the organisation is proactive in raising awareness and building an anti-economic crime culture. Production of materials, and on-going review to ensure that they remain up to date and fit for purpose, taking into account feedback received.	Throughout the Year
2	Undertake a suitable exercise to identify the level of fraud awareness within the organisation and analyse and act upon the results.	Q4
3	To develop and maintain the counter fraud pages contained on the Health Board intranet site, to include details of successfully prosecuted cases – both local and national	Q1 and Q3
4	Ensure that Fraud and Corruption Reporting Line advertising posters are displayed throughout the organisation and beyond, publicising the free-phone reporting line number.	Throughout the Year
5	Arrange for pay-slip messages to be utilised during the year as appropriate.	As Appropriate
TOTAL DAYS ALLOCATED		20

PREVENT AND DETER

	TASK/OBJECTIVE	PROPOSED DELIVERY
6	Design, produce and distribute two Counter Fraud Newsletters annually, containing articles on proven fraud cases (both local and national) and other “beware” notices and relevant messages.	Q2 and Q4
7	Review key organisational policies, procedures and documents, to ensure that the content appropriately address any potential economic crime risk(s). Ensure the communication of revised policies, procedures and documents as appropriate, emphasising the organisational commitment to countering fraud.	As Appropriate
8	In conjunction with the Head of Communications, review and update the Local Counter Fraud Communications Strategy to ensure that it remains up to date and fit for purpose, and that all appropriate awareness-raising mechanisms are being fully exploited.	Q4
9	Review and update information sharing protocols currently in place, and explore opportunities for new protocols where appropriate.	Q4
10	Regular meetings with the Head of Internal Audit (NWSSP Audit & Assurance)	Throughout the Year
11	Response to ad-hoc requests for assistance received.	Throughout the Year
12	Action Fraud Prevention Instructions issued by the NHS Counter Fraud Authority where appropriate.	As Appropriate
13	Issue of fraud alerts to all appropriate staff.	As Appropriate
14	Monitor the implementation of agreed action, following recommendations made by investigators as a result of investigations and proactive reviews, or as a result of fraud prevention instructions or alerts issued.	As Appropriate
15	Regular meetings with the Post Payment Verification Location Manager (NWSSP Primary Care), and review of PPV final reports.	Throughout the Year
16	Membership of the Western Bay Local Intelligence Network and attendance at meetings.	Throughout the Year

	TASK/OBJECTIVE	PROPOSED DELIVERY
17	Participate in mandatory national proactive exercises, as instructed by the NHS Counter Fraud Authority, Auditor General for Wales and/or the Cabinet Office (e.g. NFI).	Throughout the Year
18	Participate in mandatory risk assessment exercises as instructed by the NHS Counter Fraud Authority.	As Appropriate
19	Conduct local proactive detection and detection exercises as agreed with the Director of Finance	Throughout the Year
	TOTAL DAYS ALLOCATED	193

HOLD TO ACCOUNT

	TASK/OBJECTIVE	PROPOSED DELIVERY
20	Conduct investigations into all allegations of economic crime as required, in line with the requirements of the NHS Counter Fraud Manual, and all relevant legislation.	As Required
21	Appropriate use of the relevant case management system(s), in line with the NHS Counter Fraud Authority and NHS CFS Wales requirements.	As Required
22	Assist the NHS Counter Fraud Authority and/or NHS CFS Wales as required in respect of any regional or national investigations.	As Required
23	Ensure the application of sanctions in line with legislation and the policy document 'Applying Appropriate Sanctions Consistently'.	As Required
24	Wherever possible, seek financial redress/recovery in respect of any proven loss to the Health Board, having due regard to the particular circumstances of each case.	As Required
25	Maintain comprehensive records of time spent on each individual investigation so that this can be included in any redress claim made by the Health Board.	As Required
	TOTAL DAYS ALLOCATED	280

STRATEGIC GOVERNANCE

	TASK/OBJECTIVE	PROPOSED DELIVERY
26	Attendance at all Fraud Forum meetings held by CFS Wales.	Throughout the Year
27	Continued review/revision of mechanisms in place for the recording and management of identified economic crime risks, in line with the organisation's Risk Management Policy and Strategy.	Throughout the Year
28	Completion and agreement of the annual work plan with Director of Finance	Q4
29	Completion and agreement of the annual report with Director of Finance	Q1
30	Regular meetings/liaison with Director of Finance	Throughout the Year
31	Preparation for and attendance at Audit Committee meetings.	Throughout the Year
32	Full participation in the quality assurance process as directed by NHS Counter Fraud Authority	Q4 and As Required
33	Undertake additional training as required by the Health Board or NHS Counter Fraud Authority.	As Required
34	Implementation of the revised case management CLUE3, as mandated by the NHS Counter Fraud Authority.	As Required
35	Provide regular reports and <i>ad hoc</i> information to NHS Counter Fraud Authority, NHS Counter Fraud Service Wales and Welsh Government and others as required	As Required
	TOTAL DAYS ALLOCATED	80

SUMMARY TOTALS

	GENERIC AREA OF ACTIVITY	RESOURCE ALLOCATED (in days)
A	INFORM AND INVOLVE	20
B	PREVENT AND DETER	193
C	HOLD TO ACCOUNT	280
D	MANDATORY COUNTER FRAUD ARRANGEMENTS (STRATEGIC WORK)	80
	TOTAL	573