



## **Swansea Bay University Health Board Counter Fraud Work Plan 2021/22**

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# COUNTER FRAUD WORK PLAN 2021/22

## Introduction

NHS Wales will introduce Government Functional Standards on Counter Fraud to replace NHS Counter Fraud Authority's (NHS CFA) 'NHS Counter Fraud Standards (Wales)' from 2021/22. The Quality Assessment will remain the same with oversight from NHS Counter Fraud Authority. A full in-depth self-assessment against the new standards will be undertaken as part of the usual end of year process.

Full compliance with the new standards is not to be enforced until 2023/24 to allow Organisations to adjust. A mapping process between new and former standards was undertaken by NHS CFA this is appended to this report for information.

From an initial assessment the Health Board is in a relatively healthy position to align to the new standards. Areas that will require particular development have been identified as:

**Component 3** – Fraud bribery and corruption risk assessment. This is something that has been worked on in 2020/21 in preparation. This is a developing area across NHS Wales and England. Further guidance and assistance from NHS CFA on aligning this work to Government Counter Fraud Profession fraud risk assessment methodology is anticipated in 2021/22 which will subsequently be adopted and implemented within the Health Board.

**Component 6** – Outcome based metrics. Introduction of formal KPIs with targets set at beginning of year is completely new. Consistency across NHS Wales will be key for this. KPIs are useful for measuring performance and pushing for improvement becoming purely target driven may have a negative impact on work overall. A balance with consistent application will be key for this new standard.

**Component 8** – Reporting Identified Loss. A new case management system to be introduced on 1<sup>st</sup> April 2021 will assist in meeting this new standard. Consistency across NHS Wales in the form of calculation formula has been agreed to identify and report losses.

The Government Functional Standards and NHS Requirements to meet those standards are available in full at <https://cfa.nhs.uk/government-functional-standard/NHS-requirements>.

This work plan has been developed to maintain the areas of work in which the Health Board is already strong in, develop in the areas of potential weakness and ensure overall alignment to the new Standards. Where a Work Plan action is directly applicable to a particular Standard Component these have been referenced (GovS 013 component X).

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INFORM AND INVOLVE		
	TASK/OBJECTIVE	PROPOSED DELIVERY
1	Design and deliver a programme of counter fraud awareness presentations to staff at all levels within the Health Board, including participation in the Health Board induction programme, with the aim of ensuring that the organisation is proactive in raising fraud awareness and building an anti-fraud culture in line with GovS 013 component 11. Review and maintain materials and media used. Evaluate presentations, collate results, and amend presentations as a result of the feedback received. Report outcomes to the Director of Finance.	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 information contained on the Health Board intranet site, to include details of successfully prosecuted cases – both local and national	Q2 and Q4
4	Ensure that Fraud and Corruption Reporting Line advertising posters are displayed throughout the organisation, publicising the free-phone reporting line number.	Throughout the Year
5	Actively promote and encourage staff awareness and completion of the Counter Fraud E-learning package.	Throughout the Year
6	Arrange for pay-slip messages to be utilised during the year as appropriate.	As Appropriate
7	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
8	In conjunction with the Health Board Communications Team, review the strategy in place for raising awareness of economic crime risks and publicise the work of the LCFS, to ensure that it remains fit for purpose and that all appropriate awareness-raising mechanisms are being fully exploited.	Q2

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INFORM AND INVOLVE		
	TASK/OBJECTIVE	PROPOSED DELIVERY
9	In line with GovS 013 Components 4, 7 and 12 undertake targeted surveys of staff to measure awareness of: Counter Fraud, Bribery and Corruption Policy and Response Plan; Fraud, Bribery and Corruption incident reporting routes; and Policy and procedures relating to Conflicts of Interests, Gifts and Hospitality and Bribery Act.	Throughout the Year
	<b>TOTAL DAYS ALLOCATED</b>	<b>119</b>

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PREVENT AND DETER		
	TASK/OBJECTIVE	PROPOSED DELIVERY
10	Review key organisational policies, procedures and documents, to ensure that they are adequately robust to counter fraud. The communication of revised policies, procedures and documents as appropriate, emphasising the organisational commitment to countering fraud.	As Appropriate
11	Carry out risk analysis in line with Government Counter Fraud Profession (GCFP) fraud risk assessment methodology. Record and manage assessed risk in line with the Health Board's Risk Management policy and include on the risk registers where appropriate in line with GovS 013 component 3.	Q4
12	Develop a fraud risk profile developed from risk assessment work to effectively evaluate, evidence and measure the effectiveness of counter fraud work in mitigating and reducing fraud risk or expenditure and influencing of policy and procedure aimed at reducing fraud in line with GovS 013 component 2 and GovS 013 component 5.	Throughout the Year
13	Liaise with Corporate Governance colleagues around measuring effectiveness and staff awareness of conflicts of interest policy and registers that include gifts and hospitality with reference to fraud, bribery and corruption, and the requirements of the Bribery Act 2010 in line with GovS 013 component 12.	Throughout the Year
14	Review and update information sharing protocols currently in place. Explore opportunities for new protocols where appropriate.	Q4
15	Regular meetings with the Head of Internal Audit (NWSSP Audit & Assurance)	Throughout the Year
16	Record and respond to ad-hoc requests for assistance received.	Throughout the Year
17	Action Fraud Prevention Instructions issued by NHS Counter Fraud Authority and/or Counter Fraud Services Wales as and where appropriate.	As Appropriate

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PREVENT AND DETER		
	TASK/OBJECTIVE	PROPOSED DELIVERY
18	Issue of fraud alerts to all appropriate staff.	As Appropriate
19	Regular liaison with the Post Payment Verification Location Manager (NWSSP Primary Care) and Primary Care leads to ensure that any contractor visits which result in the identification of anomalies are reported to the LCFS.	Throughout the Year
20	Participate in mandatory national proactive exercises, as instructed by NHS Counter Fraud Authority, Auditor General for Wales and/or the Cabinet Office (e.g. NFI).	Throughout the Year
21	Participate in thematic fraud risk evaluation exercises as instructed by the NHS Counter Fraud Authority.	As Required
22	Conduct proactive work to detect fraud using relevant information and intelligence to identify anomalies that may be indicative of fraud, bribery and corruption. Results of this work are evaluated and where appropriate feed into improvements to prevent and deter fraud, bribery and corruption in line with GovS 013 component 10.	Throughout the Year
23	Membership of Local Intelligence Network and attendance at meetings.	As Required
TOTAL DAYS ALLOCATED		175

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HOLD TO ACCOUNT		
	TASK/OBJECTIVE	PROPOSED DELIVERY
24	Conduct investigations into all allegations of economic crime as required, in line with the requirements of the NHS Counter Fraud Authority Counter Fraud Manual, and all relevant guidance and legislation.	As Required
25	Appropriate use of the prescribed case management system, in line with NHS Counter Fraud Authority and NHS CFS Wales requirements.	As Required
26	Assist NHS Counter Fraud Authority and/or NHS CFS Wales as required in respect of any regional or national investigations.	As Required
27	Ensure the application of sanctions in line with legislation and the policy document 'Applying Appropriate Sanctions Consistently'.	As Required
28	Identify and maintain appropriate records and, 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
29	Review professional competencies and capabilities of accredited staff nominated to undertake the full range of counter fraud work to assess requirements for professional development opportunities in line with GovS 013 Component 9.	Q1
TOTAL DAYS ALLOCATED		350

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STRATEGIC GOVERNANCE		
	TASK/OBJECTIVE	PROPOSED DELIVERY
29	Attendance at all Fraud Forum meetings held by CFS Wales.	As Required
30	Nominate a Fraud Champion for the Health Board in line with GovS 013 component 1.	Q1
31	Completion and agreement of the annual work plan with Director of Finance in line with GovS 013 component 2.	Q4
32	Completion and agreement of the annual report with Director of Finance	Q1
33	Regular meetings/liaison with Director and/or Assistant Director of Finance	Throughout the Year
34	Preparation for and attendance at Audit Committee meetings.	As Required
35	Full participation in the quality assurance process as directed by NHS Counter Fraud Authority	Q4 and As Required
36	Undertake additional training as required by the Health Board or NHS Counter Fraud Authority.	As Required
37	Implementation of the revised case management CLUE3, as mandated by the NHS Counter Fraud Authority. Utilise system to record all fraud, bribery and corruption investigative activity, including all outcomes, recoveries and system weaknesses identified during the course of investigations and/or proactive prevention and detection exercise in line with GovS 013 component 8.	Q1 and Throughout the Year
38	Provide regular reports and <i>ad hoc</i> information to NHS Counter Fraud Authority and Welsh Government as required	Throughout the Year
39	Review the Health Board's Counter Fraud Policy and Response Plan to ensure up to date and relevant contents as well as alignment to Government Functional Standards in line with GovS 013 component 4 and GovS 013 component 7.	Q2



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STRATEGIC GOVERNANCE		
	TASK/OBJECTIVE	PROPOSED DELIVERY
40	Develop a system of outcome based metrics around reported incidents of fraud, bribery and corruption, the value of identified fraud losses, the value of fraud recoveries, the value of fraud prevented, criminal sanctions and disciplinary sanctions to enable targets to be set on an annual basis. Develop ability to evidence performance against set metrics in line with GovS 013 component 6.	Throughout the Year
	<b>TOTAL DAYS ALLOCATED</b>	<b>60</b>

## COUNTER FRAUD WORK PLAN 2021/22

### SUMMARY TOTALS

	STRATEGIC AREA OF ACTIVITY	RESOURCE ALLOCATED (in days)
A	INFORM AND INVOLVE	119
B	PREVENT AND DETER	175
C	HOLD TO ACCOUNT	350
D	STRATEGIC GOVERNANCE	60
	TOTAL	704

## COUNTER FRAUD WORK PLAN 2021/22

### Appendix – Mapping of New Government Functional Standards to Previous NHS Counter Fraud Standards Wales

#### Strategic Governance

NHSCFA Standard		Functional Standard	Notes
1.1	A member of executive board accountable	Component 1 NHS Requirement 1A	
1.2	Non-executive or lay members accountable for assurance	Component 1 NHS Requirement 1B	
1.3	Employs/contracts accredited LCFS	Component 9 NHS Requirement 9	
1.4	Comprehensive risk assessment	Component 3 NHS Requirement 3	
1.5	Annual report	Component 1 NHS Requirement 1B	
1.6	Counter fraud work necessary tools and resources		Referenced in NHS Requirements <a href="#">3</a> and <a href="#">5</a> .
1.7	Lines of communication		Referenced in NHS Requirements <a href="#">3</a> , <a href="#">5</a> and <a href="#">7</a> . Includes evidence in the use of the approved NHS Fraud Case Management System.

#### Inform & Involve

NHSCFA Standard		Functional Standard	Notes
2.1	Ongoing programme of fraud awareness	Component 11 NHS Requirement 11	
2.2	Fraud, bribery and corruption policy	Component 4 NHS Requirement 4	

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NHSCFA Standard		Functional Standard	Notes
2.3	Liaison with organisations and agencies		Manual of guidance advises on information requests. Further evidenced by use of the approved NHS Fraud Case Management System.
2.4	Code of conduct (inc Bribery Act 2010)	Component 12 NHS Requirement 12	

### Prevent & Deter

NHSCFA Standard		Functional Standard	Notes
3.1	Review policies		Manual of guidance.
3.2	Use of info/intel to ID anomalies FBC	Component 10 NHS Requirement 10	
3.3	Issue, implement, comply with FBS intel bulletins		Amalgamated into NHS Requirement 10
3.4	Pre-employment checks		Amalgamated into NHS Requirement 10
3.5	Prevent, deter, detect - Procurement		Amalgamated into NHS Requirement 10
3.6	Prevent, deter, detect - Invoice		Amalgamated into NHS Requirement 10

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### Hold to Account

NHSCFA Standard		Functional Standard	Notes
4.1	Record on case management system (CMS)	Component 8 NHS Requirement 8	
4.2	Use CMS in investigations	Component 8 NHS Requirement 8	
4.3	Pursue sanctions		Manual of guidance. Further evidenced by use of the approved NHS Fraud Case Management System.
4.4	Witness statements		Evidence for NHS Requirement 9
4.5	Interviews under caution		Evidence for NHS Requirement 9
4.6	Recovery of losses		Manual of guidance. Further evidenced by use of the approved NHS Fraud Case Management System.