



Meeting Date	10th September 2020	Agenda Item	5.1	
Report Title	Counter Fraud Progress Report			
Report Author	Matthew Evans – Head of Local Counter Fraud Services			
Report Sponsor	Darren Griffiths – Director of Finance			
Presented by	Matthew Evans – Head of Local Counter Fraud Services			
Freedom of Information	Closed			
Purpose of the Report	The purpose of this report is to update the Audit Committee on key areas of work undertaken by the Health Board Local Counter Fraud Specialists since the last meeting.			
Key Issues	<p>The report sets out activity under the Key Principles specified within the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales). The report covers: -</p> <ul style="list-style-type: none"> • Strategic governance • Inform and Involve • Prevent and Deter • Hold to Account 			
Specific Action Required <i>(please ✓ one only)</i>	Information	Discussion	Assurance	Approval
	✓			
Recommendations	<p>The Audit Committee is asked to:</p> <ul style="list-style-type: none"> • Note the Counter Fraud Progress Report. 			

1. INTRODUCTION

- 1.1 The purpose of this report is to update the Audit Committee on key areas of work undertaken by the Health Board Local Counter Fraud Specialists since the last meeting.

2. BACKGROUND

- 2.1 Meetings are held on a regular basis with the Director of Finance (interim), where progress against the annual work plan and with the LCFS case workload is discussed and monitored.
- 2.2 The following sets out activity under the Key Principles specified within the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales).

3. STRATEGIC GOVERNANCE

- 3.1 The Head of Local Counter Fraud Services (HoLCFS) has been nominated as the representative for all Wales LCFS on the Counter Fraud Steering Group (CFSG), a sub-group of the NHS Wales Directors of Finance Group. The role of the CFSG is to provide strategic oversight and review of the counter fraud service in Wales. The HoLCFS replaces the previous incumbent in role.
- 3.2 The HoLCFS has been part of a series of 1 to 1 meetings with Senior Managers across the Health Board. The meetings allowed an introduction between the new HoLCFS and key stakeholders in counter fraud work to enable continuity of working relationship as well as setting out new ways of working to ease flow of information between the parties and support on common interests. The HoLCFS has established links and processes with the Health Board's Cyber Security Team, Senior Finance Team, Medicines Management, Nurse Bank.
- 3.3 The HoLCFS has established a central inbox for the Counter Fraud Team, SBU.CounterFraudTeam@wales.nhs.uk. The central inbox offers benefits to the team in terms of presenting emails from the Team rather than individuals, it provides the Health Board with a central point to contact the Team and gives continuity to counter fraud work if staff do move on. The new inbox has been added to all awareness literature and will be promoted as the contact point for the Counter Fraud Team going forward.

4. INFORM AND INVOLVE

- 4.1 As detailed within the 2020/21 Counter Fraud Work Plan, an on-going programme of work has been put in place to raise awareness of fraud, bribery and corruption amongst all staff and practitioners across all sites. Face to face learning had been paused due to the pandemic. The face to face classes are now being delivered virtually via Microsoft Teams. The staff who had booked on to the face to face class are being invited to join the virtual setting instead and future dates will be circulated to ensure any staff who missed out due to previously cancelled face to face sessions have opportunity to join a later virtual session. The Counter Fraud Team have delivered 2 presentations in

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August via Microsoft Teams. A further 18 presentations are planned for 2020/21. More sessions will be added if demand is high; delivery will be reviewed if organisational priorities shift back to a Covid focus.

- 4.2 To support remote awareness raising the Counter Fraud Team have developed a counter fraud information booklet which succinctly provides information on identifying fraud and scams as well as outlining actions to take if concerns are held. The information booklet can be utilised in a number of different contexts and will form the basis of information the Counter Fraud Team can provide to staff.
- 4.3 A Counter Fraud Newsletter has been produced and issued to staff. A copy is appended to this report for the Committee's perusal. The Newsletter is available in Welsh and English languages.
- 4.4 The HoLCFS has arranged a slot on the Health Board's Medicine Management Safety Days. These are refresher training days for registered professionals with access to controlled drugs and medication but whose conduct in relation to that has fallen short of standards. The Counter Fraud Team will seek to reinforce the messages delivered on those training days. The delivery of these days had been paused but work is underway to reinstate.
- 4.5 The HoLCFS is seeking a slot on the Health Board's Managers Pathway Finance Day. This is a course designed for new managers to support around additional responsibilities. Managers are key to counter fraud work by being front line in terms of identification of fraud risk as well as often being approached by staff who have fraud concerns. The delivery of these days had been paused but work is underway to reinstate.

5. PREVENT AND DETER

- 5.1 A proactive fraud detection exercise has been commenced around pre-employment checks. This will cover Agencies, Nurse Bank and substantive recruitment. Verification of pre-employment checks undertaken by agencies by NHS Organisations was raised as a risk area by NHS Counter Fraud Authority in 2019/20 who established there was an over reliance on the contract terms which state that it is the responsibility of the Agency to undertake pre-employment checks.
- 5.2 Verification of pre-employment checks for substantive and Nurse Bank staff will cover recruitment completed in 2019 A review of Internal Audit findings in relation to Covid recruitment will be undertaken to assess requirement for proactive fraud detection work around that intake.
- 5.3 A report will be presented to the Committee upon completion of exercise.
- 5.4 As part of NHS Counter Fraud Standards, specifically Standard 3.1, the Health Board must review new and existing relevant policies and procedures to ensure that appropriate counter fraud, bribery and corruption measures are

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included. This process is known as 'fraud-proofing'. In 2020/21 the Counter Fraud Team have reviewed the following policies:

- Research Misconduct Policy;
- Policy advice where there is an unexplained loss or suspected/actual diversion of medication on Wards and departments in Swansea Bay UHB.
- Audit, Fraud & Corruption and Security Management – FCP No.3

5.5 The HoLCFS has arranged access to the Health Board's National Fraud Initiative (NFI) account. Data encompassing ESR records and accounts payable information will be submitted to the NFI for the next iteration of the Initiative in the Autumn.

5.6 The HoLCFS reviewed the Risk Management Policy and Procedure within the Health Board. Datix training to enable the Counter Fraud Team to access the system and manage fraud risks has been arranged for mid-September. The Counter Fraud Team have been briefed on how and when risk assessments should be undertaken – training needs in relation to this will be considered as work in this area progresses. Once in place known fraud risks from variety of sources such as previous fraud alerts, NHS CFA Fraud Prevention Notices and national guidance will be formally considered and assessed in line with Health Board procedure.

6. HOLD TO ACCOUNT

6.1 The status of the LCFS investigative caseload at the time of reporting is summarised in a separate report to be discussed within in-committee session.

7. RECOMMENDATION

The Audit Committee is asked to: -

- **Note** the Counter Fraud Progress Report.

Governance and Assurance							
Link to corporate objectives <i>(please ✓)</i>	Promoting and enabling healthier communities		Delivering excellent patient outcomes, experience and access		Demonstrating value and sustainability	Securing a fully engaged skilled workforce	Embedding effective governance and partnerships
					✓		✓
Link to Health and Care Standards <i>(please ✓)</i>	Staying Healthy	Safe Care	Effective Care	Dignified Care	Timely Care	Individual Care	Staff and Resources
							✓
Quality, Safety and Patient Experience							
Ensuring that the Health Board has an effective counter fraud function, operating at part of a robust overall governance framework, is a key factor in the quality, safety and experience of patients receiving care.							
Financial Implications							
Long standing budget provision for counter fraud services within ABMU is already in place.							
Legal Implications (including equality and diversity assessment)							
The counter fraud work detailed within this report has been delivered by an accredited and nominated Local Counter Fraud Specialist, in line with an agreed and appropriately resourced Counter Fraud Work Plan. This ensures that the Health Board remains compliant with the Directions to NHS Bodies on Counter Fraud Measures, and with the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales).							
Staffing Implications							
The counter fraud work set out herein has been delivered within the context of existing resources.							
Long Term Implications (including the impact of the Well-being of Future Generations (Wales) Act 2015)							
No implications for the Committee to be aware of.							
Report History	Progress reports are submitted to the Audit Committee on a regular basis throughout the year.						
Appendices	Appendix one - newsletter						