



**GIG**  
CYMRU  
**NHS**  
WALES

Bwrdd Iechyd Prifysgol  
Bae Abertawe  
Swansea Bay University  
Health Board



<b>Meeting Date</b>	<b>12 March 2020</b>	<b>Agenda Item</b>	<b>6.1</b>
<b>Report Title</b>	<b>Counter Fraud Policy &amp; Response Plan</b>		
<b>Report Author</b>	Len Cozens – Head of Local Counter Fraud Services		
<b>Report Sponsor</b>	Lynne Hamilton – Director of Finance		
<b>Presented by</b>	Len Cozens – Head of Local Counter Fraud Services		
<b>Freedom of Information</b>	Open		
<b>Purpose of the Report</b>	The purpose of this report is to present the revised Counter Fraud, Bribery & Corruption Policy & Response Plan for Swansea Bay University Health Board to the Audit Committee for approval.		
<b>Key Issues</b>	<p>The Fraud, Bribery and Corruption Standards for NHS Bodies (Wales), produced by the NHS Counter Fraud Authority, require organisations to put in place a Fraud Bribery &amp; Corruption Policy which must be approved by the executive body or senior management team.</p> <p>The extant Policy, which incorporates the Health Board's response plan, has been reviewed and updated to ensure that it remains relevant and fit for purpose.</p> <p>The Policy forms part of the Health Board's Standing Orders.</p>		
<b>Specific Action Required</b> <i>(please choose one only)</i>	<b>Information</b>	<b>Discussion</b>	<b>Assurance</b>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input checked="" type="checkbox"/>
<b>Recommendations</b>	The Audit Committee is asked to <b>approve</b> the revised Counter Fraud Policy & Response Plan.		

# **SWANSEA BAY UHB COUNTER FRAUD POLICY & RESPONSE PLAN REVIEW UPDATE – NOVEMBER 2019**

## **1. INTRODUCTION**

- 1.1 The purpose of this report is to present the revised Counter Fraud, Bribery & Corruption Policy & Response Plan for Swansea Bay University Health Board to the Audit Committee for approval.

## **2. BACKGROUND**

- 2.1 The Fraud, Bribery and Corruption Standards for NHS Bodies (Wales), produced by the NHS Counter Fraud Authority, require organisations to put in place a Fraud Bribery & Corruption Policy which must be approved by the executive body or senior management team.
- 2.2 This document is intended to provide direction and help to staff, Officers and Directors who identify and/or find themselves having to deal with suspected cases of economic crime. It gives a framework for a response, and advice and information on various aspects and implications of an investigation. This Policy should be read in conjunction with the Health Board's Disciplinary Policy, and Procedure for NHS Staff to Raise Concerns.

## **3. SUMMARY OF REVIEW**

- 3.1 The changes made to the policy document as a result of this review can be summarised as follows:
- Paragraph 1.4 has been updated to include signposting of both the Bribery Policy and Standards of Business Conduct as documents which should be read in conjunction with this Policy.
  - Minor amendments have been made to Section 4 to give more detail on the offences created by the Fraud Act.
  - An additional appendix has been added at Appendix 1, giving fuller examples of economic crime risks which can and do impact on NHS Wales.
  - Paragraph 6.3 has been reworded to more accurately reflect the responsibilities of NWSSP Audit & Assurance Services in respect of economic crime matters.
  - The name and contact details for Protect (formerly Public Concern at Work) have been updated at paragraph 7.3.2
  - The process charts as Appendix 2 have been reviewed and updated to ensure completeness and accuracy.

#### 4. RECOMMENDATION

- 4.1 The Audit Committee is asked to **approve** the revised Counter Fraud Policy & Response Plan.

<b>Governance and Assurance</b>		
<b>Link to Enabling Objectives</b> <i>(please choose)</i>	<b>Supporting better health and wellbeing by actively promoting and empowering people to live well in resilient communities</b>	
	Partnerships for Improving Health and Wellbeing	<input type="checkbox"/>
	Co-Production and Health Literacy	<input type="checkbox"/>
	Digitally Enabled Health and Wellbeing	<input type="checkbox"/>
	<b>Deliver better care through excellent health and care services achieving the outcomes that matter most to people</b>	
	Best Value Outcomes and High Quality Care	<input checked="" type="checkbox"/>
	Partnerships for Care	<input type="checkbox"/>
	Excellent Staff	<input type="checkbox"/>
	Digitally Enabled Care	<input type="checkbox"/>
	Outstanding Research, Innovation, Education and Learning	<input type="checkbox"/>
<b>Health and Care Standards</b>		
<i>(please choose)</i>	Staying Healthy	<input type="checkbox"/>
	Safe Care	<input type="checkbox"/>
	Effective Care	<input type="checkbox"/>
	Dignified Care	<input type="checkbox"/>
	Timely Care	<input type="checkbox"/>
	Individual Care	<input type="checkbox"/>
	Staff and Resources	<input checked="" type="checkbox"/>
<b>Quality, Safety and Patient Experience</b>		
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.		
<b>Financial Implications</b>		
Long standing budget provision for counter fraud services within Swansea Bay UHB (and predecessor organisation(s)) is already in place.		
<b>Legal Implications (including equality and diversity assessment)</b>		
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).		
<b>Staffing Implications</b>		
The counter fraud work set out herein has been delivered within the context of existing resources.		
<b>Long Term Implications (including the impact of the Well-being of Future Generations (Wales) Act 2015)</b>		
No implications for the Committee to be aware of.		
<b>Report History</b>	Progress reports are submitted to the Audit Committee on a regular basis throughout the year.	
<b>Appendices</b>	Counter Fraud Policy & Response Plan (Attached)	