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Bwrdd Iechyd Prifysgol
Bae Abertawe
Swansea Bay University
Health Board



Meeting Date	16th May 2019	Agenda Item	6a
Report Title	Counter Fraud Work Plan 2019-20		
Report Author	Len Cozens – Head of Local Counter Fraud Services		
Report Sponsor	Lynne Hamilton – Director of Finance		
Presented by	Len Cozens – Head of Local Counter Fraud Services		
Freedom of Information	Open		
Purpose of the Report	The purpose of this report is to present the Swansea Bay University Health Board Counter Fraud Work Plan for 2019/20 to the Audit Committee for approval.		
Key Issues	The Fraud, Bribery and Corruption Standards for NHS Bodies (Wales) produced by the NHS Counter Fraud Authority require the Local Counter Fraud Specialist (LCFS) and Director of Finance to agree, at the beginning of each financial year, a written work plan which outlines the LCFS' projected workload for that year. This is the agreed plan for 2019/20.		
Specific Action Required <i>(please ✓ one only)</i>	Information	Discussion	Assurance
			✓
Recommendations	The Committee is asked to Approve the Counter Fraud Work Plan for 2019/20.		

COUNTER FRAUD WORK PLAN 2019/20

1. PURPOSE

- 1.1. The purpose of this report is to present the Swansea Bay University Health Board Counter Fraud Work Plan for 2019/20 to the Audit Committee for approval.

2. BACKGROUND

- 2.1 The NHS Counter Fraud Authority Fraud, Bribery and Corruption Standards for NHS Bodies (Wales) require the Local Counter Fraud Specialist (LCFS) and Director of Finance to agree, at the beginning of each financial year, a written work plan which outlines the LCFS' projected workload for that year.

3. COUNTER FRAUD WORK PLAN 2019/20

- 3.1 The format of the Work Plan reflects the Key Principles detailed within the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales), these being:
- Inform and Involve
 - Prevent and Deter
 - Hold to Account
 - Strategic Governance
- 3.2 The content of the Work Plan has been produced by the Head of Local Counter Fraud Services and agreed with the Director of Finance, taking due account of:
- An assessment of the work required to ensure consistent and effective implementation and delivery of the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales).
 - An analysis of systems, processes and/or areas which expose the Health Board to a potential or inherent fraud, bribery or corruption (economic crime) risk
- 3.3 The resource available for the delivery of the 2019/20 Counter Fraud Work Plan equates to 630 days. The plan itself, which is attached in detail and is summarised in the following table, is designed to ensure a holistic approach to counter fraud work within the Health Board, with flexibility to allow high risk work to be undertaken urgently.

Key Principle	Resource Allocated (In Days)
Inform and Involve	50
Prevent and Deter	220
Hold to Account	305
Strategic Governance	55
Total	630

4. REPORTING

- 4.1 The Head of Local Counter Fraud Services will provide regular, detailed progress reports against the Work Plan and on-going investigative workload to the Director of Finance throughout the year.
- 4.2 Update reports will also be provided to the Audit Committee, culminating in an annual report at the end of the year.

5. Services provided to other health bodies

- 5.1 In addition to the full counter fraud service which has been provided to Powys Teaching Health Board since 2017, Swansea Bay UHB will, with effect from April 2019, also be providing local counter fraud services to Cwm Taf Morgannwg University Health Board under the terms of a service level agreement.
- 5.2 Reporting and monitoring of the delivery of these services will be via each health body's respective Director of Finance and Audit Committee.

6. RECOMMENDATION

- 6.1 The Audit Committee is asked to:
- **Approve** the Counter Fraud Work Plan for 2019/20
 - **Note** the arrangements for the provision of local counter fraud services to Powys Teaching Health Board and Cwm Taf Morgannwg University Health Board.

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
			✓		✓
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 Swansea Bay UHB is already in place.					
Services are also provided to Powys Teaching Health Board and Cwm Taf University Health Board under the terms of Service Level Agreements, and reimbursement is received accordingly.					
Legal Implications (including equality and diversity assessment)					
Failure to nominate an appropriately accredited Local Counter Fraud Specialist and to agree an appropriately resourced Counter Fraud Work Plan would place the organisation in breach of the Directions to NHS Bodies on Counter Fraud Measures, and result in a failure to comply with the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales).					
Staffing Implications					
The delivery of the proposed work plan is set 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	This is not applicable to this report.				
Appendices	Counter Fraud Work Plan 2019/20				

COUNTER FRAUD WORK PLAN 2019/20

INFORM AND INVOLVE

	TASK/OBJECTIVE	PROPOSED DELIVERY
1	Design and deliver a programme of economic crime awareness presentations to 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 presentation 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	Review and update fraud awareness material supplied to new Health Board staff as part of the staff handbook in order to ensure that it remains fit for purpose.	Q1
6	Arrange for pay-slip messages to be utilised during the year as appropriate.	As Appropriate
	TOTAL DAYS ALLOCATED	50

PREVENT AND DETER

	TASK/OBJECTIVE	PROPOSED DELIVERY
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	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
9	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
10	Review and update information sharing protocols currently in place, and explore opportunities for new protocols where appropriate.	Q4
11	Regular meetings with the Head of Internal Audit (NWSSP Audit & Assurance)	Throughout the Year
12	Response to ad-hoc requests for assistance received.	Throughout the Year
13	Action Fraud Prevention Instructions issued by the NHS Counter Fraud Authority where appropriate.	As Appropriate
14	Issue of fraud alerts to all appropriate staff.	As Appropriate
15	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
16	Regular meetings with the Post Payment Verification Location Manager (NWSSP Primary Care), and review of PPV final reports.	Throughout the Year

	TASK/OBJECTIVE	PROPOSED DELIVERY
17	Membership of the Security Management Group and attendance at meetings.	Throughout the Year
18	Membership of the Western Bay Local Intelligence Network and attendance at meetings.	Throughout the Year
19	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
20	Participate in mandatory risk assessment exercises as instructed by the NHS Counter Fraud Authority.	As Appropriate
21	Conduct local proactive detection and detection exercises as agreed with the Director of Finance	Throughout the Year
	TOTAL DAYS ALLOCATED	220

HOLD TO ACCOUNT

	TASK/OBJECTIVE	PROPOSED DELIVERY
22	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
23	Appropriate use of the FIRST case management system, in line with the NHS Counter Fraud Authority and NHS CFS Wales requirements.	As Required
24	Assist the NHS Counter Fraud Authority and/or NHS CFS Wales as required in respect of any regional or national investigations.	As Required
25	Ensure the application of sanctions in line with legislation and the policy document 'Applying Appropriate Sanctions Consistently'.	As Required
26	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
27	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	305

STRATEGIC GOVERNANCE

	TASK/OBJECTIVE	PROPOSED DELIVERY
28	Attendance at all Fraud Forum meetings held by CFS Wales.	Throughout the Year
29	Attendance at Counter Fraud Steering Group Meetings	As Required
30	Review/revision of mechanisms in place for the recording and management of identified economic crime risks, in line with the revisions to Fraud, Bribery & Corruption Standard 1.4 and the organisation's Risk Management Policy and Strategy.	Throughout the Year
31	Completion and agreement of the annual work plan with Director of Finance	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.	Throughout the Year
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.	As Required
38	Provide regular reports and <i>ad hoc</i> information to NHS Counter Fraud Authority, NHS Counter Fraud Service Wales and Welsh Government as required	As Required
	TOTAL DAYS ALLOCATED	55

SUMMARY TOTALS

	GENERIC AREA OF ACTIVITY	RESOURCE ALLOCATED (in days)
A	INFORM AND INVOLVE	50
B	PREVENT AND DETER	220
C	HOLD TO ACCOUNT	305
D	MANDATORY COUNTER FRAUD ARRANGEMENTS (STRATEGIC WORK)	55
	TOTAL	630