



# **Cwm Taf Morgannwg University Health Board**

**Audit & Risk Committee – 07 December 2021**

**Counter Fraud Progress Report**

**Matthew Evans**  
**Head of Local Counter Fraud Services**

## 1. INTRODUCTION

The purpose of this report is to update the Audit & Risk Committee on key areas of work undertaken by the Health Board Local Counter Fraud Specialists (LCFS) since the last meeting.

## 2. BACKGROUND

The following sets out activity under the Key Principles specified within the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales).

## 3. RESOURCE UTILISATION

AREA OF WORK	Planned Days	Proposed Revised Planned Days	Days to Date
<b>Strategic Governance</b>			
Ensuring that anti-crime measures are embedded at all levels across the organisation	66	45	27
<b>Inform and Involve</b>			
Identifying the risks and consequences of crime against the NHS, and raising awareness of these risks amongst NHS staff, stakeholders, and the public.	135	126	51
<b>Prevent and Deter</b>			
Discouraging those who may want to commit crimes against the NHS and ensure that such opportunities are minimised.	135	120	64
<b>Hold to Account</b>			
Detecting and investigating crime, prosecuting those who have committed crimes and seeking redress as a result.	255	300	256
<b>TOTAL</b>	<b>591</b>	<b>591</b>	<b>398</b>

Due to an ongoing complex investigation the resource days used to date for Hold to Account have exceeded planned days for the year. The Head of Counter Fraud Services has reviewed the Counter Fraud Work Plan and anticipates that savings can be found in the other areas with minimal impact on delivery of the Work Plan. The days moved represent the 'safety net' days in those areas meaning we are at the bare minimum to deliver those Work Plan actions with the resource days. Any additional actions required would result in failure to deliver that additional work or need to gain additional resource.

#### **4. STRATEGIC GOVERNANCE**

NHS Counter Fraud Authority have delivered a workshop relating to fraud risk assessments and local proactive exercises (LPE). Clarity was provided on the function and definition of what NHS CFA consider to be local proactive exercises. As a result, a number of LPEs will be retrospectively recorded on the Clue case management system with work already completed on these areas.

#### **5. INFORM AND INVOLVE**

The Counter Fraud Team have taken part in Fraud Awareness Week by disseminating a fraud awareness bulletin containing a range of awareness materials including:

- Ethical dilemmas posing staff questions and seeking feedback via a Microsoft Forms survey page
- NHS Fraud Awareness videos produced by NHS Counter Fraud Authority
- Printable posters and digital banners
- Cyber Security information on staying safe from cyber enabled fraud
- General NHS fraud information

Fraud Awareness Week will be followed by a winter edition of the Counter Fraud newsletter released in the last week of November and a payslip message in December to consolidate this awareness event.

Counter Fraud Awareness Training has been arranged for the Executive Team following assistance from the Health Board's Counter Fraud Champion. 2 sessions will be delivered to Executive Assistants and Executive Officers which will be tailored to focus on risks specific to their respective roles.

A staff survey is being drafted by the Counter Fraud Team. This year there will be an all-staff survey as usual but with additional bespoke surveys focusing on business areas at higher risk of exposure to fraud tailored to those risks to test understanding of fraud awareness and gain feedback on approach. It is anticipated the surveys will be released following winter pressures in mid to late Spring in order to maximise response.

The Counter Fraud Team have disseminated 10 alerts and bulletins to staff in this year. They cover targeted communications to local Departments and Teams around specific fraud risks to their area to all staff communications via SharePoint.

#### **6. PREVENT AND DETER**

NHS Counter Fraud Authority's Fraud Prevention Unit are undertaking Fraud Prevention Guidance Impact Assessment (FPGIA) data collection survey, which relates to the period between October 2020-September 2021.

The FPU targets fraud risks identified through system weakness reporting by Local Counter Fraud Specialists (LCFSs) and NHSCFA Counter Fraud Specialists (CFSs)

by issuing FPNs that outline recommended actions and provide new guidance (or signposts to existing guidance) for NHS organisations to address and mitigate the risks at a local level.

This FPGIA is designed to measure the impact to NHS organisations who are taking action in response to the Fraud Prevention Notices (FPNs), through the implementation of appropriate fraud prevention measures, and identify the cost savings that this has brought to organisations

Following findings linked to an investigation alleging acceptance of cash payments the LCFS has liaised with the Corporate Governance Team to review the gifts and hospitality processes in the Health Board. An amendment to the Standards of Behaviour Policy with addition of overtly prohibiting acceptance of cash and gift vouchers has been made.

The LCFS has also liaised with Corporate Governance colleagues around staff Declarations of Interests. There is an opportunity to utilise National Fraud Initiative (NFI) data which matches payroll records to Companies House records to test compliance. New processes have been proposed by the Corporate Governance Team that staff at Band 8a and above are directly asked to make a Declaration of Interests. Declarations for staff below this level and a link to Declarations of Interest and staff annual performance review is being explored. An exercise using the NFI data is paused whilst this process has opportunity to take effect.

## **7. HOLD TO ACCOUNT**

The status of the LCFS investigative caseload is summarised in the Appendix to the report. A summary of basic investigation KPI data is presented at outset of appendix. Case information presented is split by between those cases which are currently open and under active investigation by the LCFS; contained in the Open Cases table. The Pending Cases table reflects those cases where active investigation by the LCFS has concluded, however the case must remain open due to other outstanding actions from third parties such as (but not limited to) disciplinary, professional body enquiries, financial recoveries.

A table of Closed Cases is also presented to review outcomes of investigations.