



Cwm Taf Morgannwg University Health Board

Audit & Risk Committee – 24 February 2022

Counter Fraud Progress Report

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1. INTRODUCTION

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 (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	Days to Date
Strategic Governance		
Ensuring that anti-crime measures are embedded at all levels across the organisation	45	38
Inform and Involve		
Identifying the risks and consequences of crime against the NHS, and raising awareness of these risks amongst NHS staff, stakeholders, and the public.	126	69
Prevent and Deter		
Discouraging those who may want to commit crimes against the NHS and ensure that such opportunities are minimised.	120	112
Hold to Account		
Detecting and investigating crime, prosecuting those who have committed crimes and seeking redress as a result.	300	299
TOTAL	591	518

4. STRATEGIC GOVERNANCE

A full review of progress against the 2021/22 Counter Fraud Work Plan has been undertaken. Findings of this exercise is presented at Appendix 1.

5. INFORM AND INVOLVE

Counter Fraud Awareness Training programme has been continuing. The Counter Fraud Team have delivered 10 training presentations via MS Teams. These presentations have only reached 45 staff members in the Health Board however. Data

has been examined to benchmark performance.

% of Total Staff Headcount Who Received Counter Fraud Training	All Wales Average	CTMUHB
2018/19	12%	2.5%
2019/20	12%	4%
2020/21	4%	0.4%
2021/22 to date	2.4%	0.4%

Covid has had an impact on counter fraud awareness training levels across NHS Wales. The Health Board has however consistently been amongst lower performers as a percentage of total staff reached.

Although the situation with Covid is progressing towards a lower level of restrictions with pandemic status moving to endemic status it is clear the NHS will continue to feel pressures for the foreseeable future. Maximising staff engagement at low pressure times, traditionally summer, is anticipated to have the greatest impact and cut through. An all-site visit across the Health Board estates by LCFs during this time will be beneficial to boost engagement levels.

The LCFs is also in liaison with the Health Board's Head of Engagement to gain advice on strategy for 2022/23 to achieve higher levels of staff engagement. A statement of need has been forwarded and resulting advice will inform the 2022/23 Counter Fraud Work Plan.

The Counter Fraud Team have disseminated 15 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

The Counter Fraud Team have engaged in a proactive exercise relating to risk of overpayments of salary to temporary staff recruited as part of Covid response. This followed the referral of overpayment of salary concerns to the Counter Fraud Team. Circumstances of these referrals were that temporary staff recruited as fixed term employees were not terminated at the end of fixed term contracts resulting in continuing pay following end of employment. Across an initial 4 referrals a total gross overpayment value of £66,000 was identified.

This issue does not impact Bank Staff recruited for Covid roles as these staff are managed on a shift by shift basis for purposes of pay.

Other Health Boards reported concerns around overpayments in similar circumstances also relating to temporary Covid workers and this was discussed at an All Wales Counter Fraud Leads meeting.

The Counter Fraud Team investigated the cause of these overpayments at the Health Board and found that once recruited and deployed local managers were then expected to action changes in employment terms as if these temporary Covid workers were any other staff, this was communicated to Managers by Workforce & OD. This direction was lost in some instances with local Managers believing these staff were being

managed centrally.

The exercise is centred on confirmation that temporary Covid staff have been terminated relevant to employment terms. The Counter Fraud Team have obtained data of all temporary Covid staff and are verifying last date of work via the Health Board's Roster system and local managers against last date of pay to identify any variance and therefore potential overpayment. The Team have so far examined records relating to 522 individuals and have identified 24 potential overpayments under 3 months and 8 potential overpayments over 3 months. Further work verifying records relating to around 500 further individuals is continuing.

Given that this issue potentially affects all Health Boards CFS Wales are keen to co-ordinate a consistent approach in terms of approach to potential criminal investigation of cases identified.

7. HOLD TO ACCOUNT

The status of the LCFS investigative caseload is summarised in Appendix 2 to the report. A summary of basic investigation KPI data is presented at outset of the 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.