



Cwm Taf University Health Board

Item 4.1 Appendix 2 - Counter Fraud Work Plan 2021/22 Review

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Head of Counter Fraud Services

February 2022

INFORM AND INVOLVE		
	TASK/OBJECTIVE	CURRENT PROGRESS
1	<p>Design and deliver a programme of counter fraud awareness presentations to staff at all levels within the Health Board, including participation in the Health Board induction programme, with the aim of ensuring that the organisation is proactive in raising fraud awareness and building an anti-fraud culture in line with GovS 013 component 11.</p> <p>Review and maintain materials and media used.</p> <p>Evaluate presentations, collate results, and amend presentations as a result of the feedback received. Report outcomes to the Director of Finance.</p>	<p>A programme of awareness presentations has been developed and implemented. The Counter Fraud Team utilise an automated booking system to minimise impact on resource.</p>
2	<p>Undertake a suitable exercise to identify the level of fraud awareness within the organisation and analyse and act upon the results.</p>	<p>A draft survey has been prepared and will be issued for responses in March 2022. The survey will target general staff and Primary Care contractors as well as tailored surveys aimed at Finance and Workforce & OD staff.</p>
3	<p>To develop and maintain the counter fraud information contained on the Health Board intranet site, to include details of successfully prosecuted cases – both local and national</p>	<p>The intranet site was refreshed earlier this year. Further update around styling to present a professional image is being undertaken by the LCFS who has sought engagement from the Health Board's Digital Communications Manager for expert assistance.</p>
4	<p>Ensure that Fraud and Corruption Reporting Line advertising posters are displayed throughout the organisation, publicising the free-phone reporting line number.</p>	<p>The Counter Fraud Team have not engaged in site visits to raise awareness in this financial year. Covid risks and pressures at sites was paramount to this decision. Summer 2022/23 is planned for a site tour with Covid rates and pressures anticipated to be at lowest.</p>

INFORM AND INVOLVE		
	TASK/OBJECTIVE	CURRENT PROGRESS
5	Actively promote and encourage staff awareness and completion of the Counter Fraud E-learning package.	Messaging around availability of Counter Fraud e-Learning has been included in issued newsletters.
6	Arrange for pay-slip messages to be utilised during the year as appropriate.	Payslip messaging has been utilised to highlight the requirement to declare secondary employment in line with Policy requirements.
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.	A Newsletter was issued in September 2021 as an Autumn edition. A spring newsletter has been drafted and will be issued in March 2022. A special edition newsletter was also issued in November 2021 to support the International Fraud Awareness Week event.
8	In conjunction with the Health Board Communications Team, review the strategy in place for raising awareness of economic crime risks and publicise the work of the LCFS, to ensure that it remains fit for purpose and that all appropriate awareness-raising mechanisms are being fully exploited.	The Counter Fraud Team engaged with colleagues from Communications Team and a series of awareness articles were released via the Health Board’s Sharepoint intranet site. The Counter Fraud Team pages were also refreshed. The LCFS has also engaged Communications Team to discuss strategy for 2022/23 for advice and direction on improving indicators of staff engagement.
9	In line with GovS 013 Components 4, 7 and 12 undertake targeted surveys of staff to measure awareness of: Counter Fraud, Bribery and Corruption Policy and Response Plan; Fraud, Bribery and Corruption incident reporting routes; and Policy and procedures relating to Conflicts of Interests, Gifts and Hospitality and Bribery Act.	A draft survey has been prepared and will be issued for responses in March 2022. The survey will target general staff and Primary Care contractors as well as tailored surveys aimed at Finance and Workforce & OD staff.

PREVENT AND DETER		
	TASK/OBJECTIVE	CURRENT PROGRESS
10	<p>Review key organisational policies, procedures and documents, to ensure that they are adequately robust to counter fraud.</p> <p>The communication of revised policies, procedures and documents as appropriate, emphasising the organisational commitment to countering fraud.</p>	<p>The Counter Fraud Team has been involved in policy and procedure review resulting from findings from investigations and risk assessment work.</p>
11	<p>Carry out risk analysis in line with Government Counter Fraud Profession (GCFP) fraud risk assessment methodology. Record and manage assessed risk in line with the Health Board's Risk Management policy and include on the risk registers where appropriate in line with GovS 013 component 3.</p>	<p>Risk assessments have been undertaken to cover core NHS fraud risks identified by NHS Counter Fraud Authority.</p>
12	<p>Develop a fraud risk profile developed from risk assessment work to effectively evaluate, evidence and measure the effectiveness of counter fraud work in mitigating and reducing fraud risk or expenditure and influencing of policy and procedure aimed at reducing fraud in line with GovS 013 component 2 and GovS 013 component 5.</p>	<p>A fraud risk profile has been developed utilising the core NHS fraud risks identified by NHS Counter Fraud Authority. Risks across all areas of NHS business have been condensed into 26 individual risk assessments. The LCFS has undertaken work on all risk assessments and identified 4 further local risk areas. Assessments are being finalised for March 2022.</p>
13	<p>Liaise with Corporate Governance colleagues around measuring effectiveness and staff awareness of conflicts of interest policy and registers that include gifts and hospitality with reference to fraud, bribery and corruption, and the requirements of the Bribery Act 2010 in line with GovS 013 component 12.</p>	<p>Liaison with Corporate Governance colleagues established that work was underway and in motion led by those colleagues on this issue. Counter Fraud supported via review of Policy and feedback presented around fraud risk of acceptance of cash. Further support via testing utilising NFI data is anticipated in 2022/23</p>
14	<p>Review and update information sharing protocols currently in place. Explore opportunities for new protocols where appropriate.</p>	<p>Information sharing protocols were reviewed and found to be sufficient for needs.</p>

PREVENT AND DETER		
	TASK/OBJECTIVE	CURRENT PROGRESS
15	Regular meetings with the Head of Internal Audit (NWSSP Audit & Assurance)	Regular meetings with Internal Audit colleagues have been undertaken throughout the year.
16	Record and respond to ad-hoc requests for assistance received.	The Counter Fraud Team receive regular contact for requests for assistance. This is recorded locally for follow up and review. Requests can result in simple advice through to risk assessment or formal investigation.
17	Action Fraud Prevention Instructions issued by NHS Counter Fraud Authority and/or Counter Fraud Services Wales as and where appropriate.	Fraud Prevention Notices are actioned as necessary including via risk assessment, information sharing and/or proactive exercise.
18	Issue of fraud alerts to all appropriate staff.	Fraud alerts have been issued as arising.
19	Regular liaison with the Post Payment Verification Location Manager (NWSSP Primary Care) and Primary Care leads to ensure that any contractor visits which result in the identification of anomalies are reported to the LCFS.	Regular meetings with PPV colleagues have been undertaken.
20	Participate in mandatory national proactive exercises, as instructed by NHS Counter Fraud Authority, Auditor General for Wales and/or the Cabinet Office (e.g. NFI).	The Health Board has participated in NFI exercise with reviews conducted on presented matched data.
21	Participate in thematic fraud risk evaluation exercises as instructed by the NHS Counter Fraud Authority.	The Health Board has issued returns to Fraud Guidance Impact Assessment and PO vs Non-PO Covid spend and Covid Procurement proactive exercises.

PREVENT AND DETER		
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22	Conduct proactive work to detect fraud using relevant information and intelligence to identify anomalies that may be indicative of fraud, bribery and corruption. Results of this work are evaluated and where appropriate feed into improvements to prevent and deter fraud, bribery and corruption in line with GovS 013 component 10.	Local proactive exercises have been commenced in year relating to receipt of cash payments for substantive NHS work and pre-employment recruitment checks.
23	Membership of Local Intelligence Network and attendance at meetings.	The LCFS is a member of the Local Intelligence Network and has attended meetings throughout the year.

HOLD TO ACCOUNT		
	TASK/OBJECTIVE	CURRENT PROGRESS
24	Conduct investigations into all allegations of economic crime as required, in line with the requirements of the NHS Counter Fraud Authority Counter Fraud Manual, and all relevant guidance and legislation.	Allegations of economic crime are investigated by the Counter Fraud Team. Investigations are undertaken in line with applicable guidance and legislation at all times.
25	Appropriate use of the prescribed case management system, in line with NHS Counter Fraud Authority and NHS CFS Wales requirements.	The Counter Fraud Team are utilising the new Clue case management system following rollout.
26	Assist NHS Counter Fraud Authority and/or NHS CFS Wales as required in respect of any regional or national investigations.	A good working relationship is maintained between Local Counter Fraud and National Teams. Assistance is provided where required reciprocally.
27	Ensure the application of sanctions in line with legislation and the policy document 'Applying Appropriate Sanctions Consistently'.	The range of sanctions available is considered in every case investigated by the Counter Fraud Team.
28	Identify and maintain appropriate records and, 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.	Financial redress/recovery is pursued in all appropriate cases. Recoveries are recorded on the case management system and reported as part of operational statistic returns.
29	Review professional competencies and capabilities of accredited staff nominated to undertake the full range of counter fraud work to assess requirements for professional development opportunities in line with GovS 013 Component 9.	A review of professional competencies and capabilities has identified that Open Source Intelligence refresh training would be beneficial to the Team. Plans are being explored to organise training on an all Wales basis for Counter Fraud Specialists across NHS Wales.

STRATEGIC GOVERNANCE		
	TASK/OBJECTIVE	CURRENT PROGRESS
29	Attendance at all Fraud Forum meetings held by CFS Wales.	The Counter Fraud Team have attended all forum meetings held by CFS Wales.
30	Nominate a Fraud Champion for the Health Board in line with GovS 013 component 1.	The Health Board's Director of Corporate Governance has been formally nominated as the Organisation's Fraud Champion
31	Completion and agreement of the annual work plan with Director of Finance in line with GovS 013 component 2.	A Counter Fraud Work Plan for 2022/23 will be presented to the Director of Finance in March 2022.
32	Completion and agreement of the annual report with Director of Finance	A Counter Fraud Annual Report was presented in Q1 2021/22.
33	Regular meetings/liaison with Director and/or Assistant Director of Finance	The Director of Finance and LCFS have engaged in meetings and discussions around Counter Fraud work.
34	Preparation for and attendance at Audit Committee meetings.	Counter Fraud is regularly on the agenda of Audit Committee meetings.
35	Full participation in the quality assurance process as directed by NHS Counter Fraud Authority	The LCFS has prepared in readiness for release or the quality assurance process for 2022/23.
36	Undertake additional training as required by the Health Board or NHS Counter Fraud Authority.	Mandatory and Statutory training has been maintained. NHS Counter Fraud Authority delivered a training workshop on
37	Implementation of the new case management CLUE3. Utilise system to record all fraud, bribery and corruption investigative activity, including all outcomes, recoveries and system weaknesses identified during the course of investigations and/or proactive prevention and detection exercise in line with GovS 013 component 8.	The new case management system is fully utilised by the Counter Fraud Team.

STRATEGIC GOVERNANCE		
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38	Provide regular reports and <i>ad hoc</i> information to NHS Counter Fraud Authority and Welsh Government as required	The Health Board participated in NHS Counter Fraud Authority exercises and provided responses. Operational Statistics reports have been provided on quarterly basis to CFS Wales and Welsh Government.
39	Review the Health Board's Counter Fraud Policy and Response Plan to ensure up to date and relevant contents as well as alignment to Government Functional Standards in line with GovS 013 component 4 and GovS 013 component 7.	The Counter Fraud Policy and Response Plan was reviewed and found to be compliant with the relevant standards; no further amendments were required at that time. A full review of the Counter Fraud Policy and Response Plan is due in October 2022.
40	Develop a system of outcome based metrics around reported incidents of fraud, bribery and corruption, the value of identified fraud losses, the value of fraud recoveries, the value of fraud prevented, criminal sanctions and disciplinary sanctions to enable targets to be set on an annual basis. Develop ability to evidence performance against set metrics in line with GovS 013 component 6.	Guidance obtained from the Quality Assurance Team at NHS Counter Fraud Authority around the operation of GovS 013 component 6 is that performance metrics are relative to the Organisation itself. Existing metrics of operational statistics can be utilised for this purpose. Further developments of the Clue case management system will lead to natural progression of these metrics with recording opportunities built into the system.