

**PWYLLGOR ARCHWILIO A SICRWYDD RISG
AUDIT AND RISK ASSURANCE COMMITTEE**

DYDDIAD Y CYFARFOD: DATE OF MEETING:	10 December 2024
TEITL YR ADRODDIAD: TITLE OF REPORT:	Counter Fraud Update
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Huw Thomas, Director of Finance
SWYDDOG ADRODD: REPORTING OFFICER:	Ben Rees, Head of Counter Fraud

Pwrpas yr Adroddiad (dewiswch fel yn addas)

Purpose of the Report (select as appropriate)

Er Gwybodaeth/For Information

ADRODDIAD SCAA

SBAR REPORT

Sefyllfa / Situation

This report provides to the Audit and Risk Assurance Committee an update on the Counter Fraud work completed within Hywel Dda University Health Board (HDdUHB). This ensures compliance with the Welsh Government Directives for Countering Fraud in the NHS and the NHS Counter Fraud Authority Requirements of the Government Functional Standard GovS 013: Counter Fraud.

The report will present a breakdown as to how resource has been used within Counter Fraud, alongside an overview of key work areas completed against the 4 NHS Counter Fraud Authority standard areas.

Cefndir / Background

Main Report:

To evidence the provision of services within a sound governance framework.

Asesiad / Assessment

Main Report:

The Health Board is compliant with the Welsh Government Directives.

Argymhelliad / Recommendation

The Audit and Risk Assurance Committee is invited to receive for information the Counter Fraud Update Report and appended items.

Amcanion: (rhaid cwblhau)

Objectives: (must be completed)

Committee ToR Reference:

Cyfeirnod Cylch Gorchwyl y Pwyllgor:

3.2 In particular, the Committee will review the adequacy of:

	3.2.4 the policies and procedures for all work related to fraud and corruption as set out in National Assembly for Wales Directions and as required by the Counter Fraud and Security Management Service.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	Not applicable.
Parthau Ansawdd: Domains of Quality Quality and Engagement Act (sharepoint.com)	3. Effective 4. Efficient
Galluogwyr Ansawdd: Enablers of Quality: Quality and Engagement Act (sharepoint.com)	4. Learning, improvement and research
Amcanion Strategol y BIP: UHB Strategic Objectives:	3. Striving to deliver and develop excellent services 6. Sustainable use of resources
Amcanion Cynllunio Planning Objectives	Not Applicable
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022	10. Not Applicable

Gwybodaeth Ychwanegol: Further Information:

Ar sail tystiolaeth: Evidence Base:	Counter Fraud Workplan 2023/24
Rhestr Termiau: Glossary of Terms:	LCFS – Local Counter Fraud Specialist/s CF – Counter Fraud CFS Wales – Counter Fraud Services Wales NHS CFA – NHS Counter Fraud Authority NWSSP – NHS Wales Shared Services Partnership LPE – Local Proactive Exercise FRA – Fraud Risk Assessment
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Archwilio a Sicrwydd Risg Parties / Committees consulted prior to Audit and Risk Assurance Committee:	Not applicable.

Effaith: (rhaid cwblhau) Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	Not applicable.
Ansawdd / Gofal Claf: Quality / Patient Care:	Not applicable.
Gweithlu: Workforce:	Not applicable.
Risg: Risk:	Not applicable.
Cyfreithiol: Legal:	Not applicable.
Enw Da: Reputational:	Not applicable.
Gyfrinachedd: Privacy:	Not applicable.
Cydraddoldeb: Equality:	Not applicable.



HYWEL DDA UNIVERSITY HEALTH BOARD

COUNTER FRAUD UPDATE

For Presentation 10 December 2024

The NHS Protect Standards are set in four generic areas:

- Strategic Governance
- Inform and Involve
- Prevent and Deter
- Hold to Account

AREA OF ACTIVITY	Resource Allocated (days) 2023/24	Resource Used (days) as at 30/11/2024	Resource Used (Percentage as at 30/11/2024)
STRATEGIC GOVERNANCE	40	32	80%
INFORM AND INVOLVE	85	64	75%
PREVENT AND DETER	120	87	72%
HOLD TO ACCOUNT	175	129	73%
TOTAL	420	312	74%

Work Area	<i>Summary of work areas completed</i>
Inform and involve	<ul style="list-style-type: none"> • All new inductees have completed the Health Board’s induction programme and the Counter Fraud mandatory training programme. The Health Board’s Learning and Development Department are currently undertaking a review of Mandatory Training and have queried with Counter Fraud as to whether the existing Counter Fraud E-Learning package needs to remain mandatory. In response, Counter Fraud have advised that the e-learning package currently in place needs to remain mandatory. The package provides the Health Board with assurance that relevant training is both provided to and completed by all employees, ensuring compliance with both Government Functional Standards and Welsh Government directions. In addition, the ability to record and document training undertaken by employees will assist in raising a defence in connection with two corporate offences, namely section 7 of the Bribery Act 2010 and section 199 of the Economic Crime and Corporate Transparency Act 2023, both of which place an onus on organisations to prevent Fraud and Bribery offences being committed by its employees or agents. At the time writing, Learning and Development have yet to provide a response to our comments. • Counter Fraud content was delivered to Nurses by way of presentations on the Medicines Management programme and the Overseas Nurses Induction. • International Fraud Awareness Week (IFAW) took place between Sunday 17 and Friday 22 November 2024. Counter Fraud participated in the event by way of holding three online Webinars and in person engagement events with GP Providers, Pharmacies, Ophthalmic services, members of the public and staff, visiting both Hospital sites and primary care settings. In addition, online Counter Fraud awareness posts were shared daily on social media via the Health Boards Communications Team and various awareness material documents were shared internally via Viva Engage and

	<p>MS Sway Newsletters, an example of which can be accessed via the following link: https://sway.cloud.microsoft/4ypmeiYLO7qud6J4?ref=Link</p> <ul style="list-style-type: none"> Alerts associated with emerging risks have been communicated to key stakeholders, these included information on lost or stolen prescriptions from neighbouring health board areas, cyber enabled fraud and other Fraud risks, including recruitment fraud. Counter Fraud currently sit on the quarterly HDdUHB Local Intelligence Network (LIN), during which advice is provided on current fraud trends associated with Controlled Drugs. Where applicable, relevant advice, including raising awareness of Fraud in NHS, is provided.
<p>Prevent and deter</p>	<ul style="list-style-type: none"> In response to identified risks, the Local Counter Fraud Department has commenced, in Q2, the national procurement exercise. Actions undertaken include establishing the controls which are in place to govern due diligence and contract management. <p>Key stakeholders consulted included Health Board employees and both NWSSP Local and Central Procurement teams. Counter Fraud, in partnership with Procurement, have identified and reviewed:</p> <ul style="list-style-type: none"> A sample of SFI breaches linked to ongoing contracts / requisitions. A sample of existing contracts from a contract due diligence / contract management perspective. A sample of No PO No Pay non-compliance requisitions. The current Construction Framework being used by the estates department. (Please note, further work is currently being undertaken by NWSSP Specialist Audit). <p>Following this review, no evidence of fraud, bribery or corruption was found. Where evidence of non-compliance was found, actions have already been undertaken to resolve and assurance sought. Further feedback on the exercise has been reported via the in-committee report.</p>

	<ul style="list-style-type: none"> • A pro-active exercise has commenced into governance procedures surrounding Right to Work checks, further details of which will be included within the in-committee report.
Hold to Account	<ul style="list-style-type: none"> • New referrals have been received into the department over the last two months, with significant work being undertaken. A detailed report of all new, existing and closed investigations has been provided to the Committee via an in-committee report.
Strategic Governance	<ul style="list-style-type: none"> • Quarterly statistics have been submitted to Counter Fraud Service (CFS) Wales and in compliance with WG directions. CFS Wales are yet to release their Q3 report. • The LCFS attended a quarterly PPV meeting, during which issues relating to current error trends were raised and discussed, with a view to identifying potential risk areas. These meetings will continue throughout the year.

Report Provided by:
Ben Rees - Lead Local Counter Fraud Specialist
For presentation; 10 December 2024

Report agreed by:
Huw Thomas
Director of Finance