



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

DYDDIAD Y CYFARFOD: DATE OF MEETING:	12 August 2025
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:	1. Striving teams
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 2025/26
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 12 August 2025

The NHS Protect Standards are set in four generic areas:

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

AREA OF ACTIVITY	2025/26 Resource (days)	Resource Used as at 31/07/2025	Resource Used (%) as at 31/07/2025)
STRATEGIC GOVERNANCE	40	11	28
INFORM AND INVOLVE	85	25	30
PREVENT AND DETER	130	41	32
HOLD TO ACCOUNT	185	51	28
TOTAL	440	128	30

Work Area	<i>Summary of work areas completed</i>
Inform and involve	<ul style="list-style-type: none"> • All new inductees are required to complete the Health Board’s induction programme and the Counter Fraud mandatory training e-learning package. • Counter Fraud content was delivered to Nurses by way of presentations on the Medicines Management programme. In addition, this last quarter has seen presentations delivered to optometrists covering the Carmarthenshire, Ceredigion and Pembrokeshire areas, engaging with all clusters, raising awareness of fraud in the NHS and the need for greater collaborative working to reduce instances to an absolute minimum. • Following receipt of a national risk alert received in connection with individuals impersonating Registered Nurses and Qualified Healthcare Support Workers for financial gain, an awareness campaign was undertaken by Counter Fraud in partnership with Nurse Bank. This involved the issuing of guidance to all Agency Nurse users around the importance of local inductions and engagement visits by both Local Counter Fraud and Nurse Bank at various sites, where such agency workers are frequently used. • In response to recent staff communication developments, which include the introduction of Viva Engage, Counter Fraud have been posting weekly alerts, which include information of emerging fraud risks, news articles and useful information around prevention of fraud. In the last three months, we have uploaded 12 posts, which have been viewed 5005 times. This has proven to be a far more effective way of engaging with employees and has generated online conversations and referrals. • Counter Fraud currently sit on the quarterly HDdUHB Local Intelligence Network (LIN), at which advice is provided on current fraud trends associated with Controlled Drugs. Where applicable, relevant advice, including raising awareness of Fraud in the NHS, is provided.

- Earlier in the year, a Fraud Risk Assessment was undertaken in connection with a Fraud Prevention Notice linked to the impersonation of Agency employed Registered Nurses and Healthcare Support Workers. In recent weeks, further alerts from NHS England have identified that this issue remains prevalent; therefore, a review of the risk will take place, and the effectiveness of the Health Board's controls reviewed by way of two exercises:
 1. Undertake a review of the existing Risk Assessment – A copy of the completed Risk Assessment has been appended to the In-Committee report. The risk has been assessed as low.
 2. Identification Checks – the exercise will look to verify the identity of those on duty on specific times and dates. A sample of workers will be identified as working via an agency on a given date. Counter Fraud will then attend the sites and verify the identity of those working by way of examining identification badges and cross referencing with known data supplied by the Nursing agency concerned.

As part of this exercise, Health Board employees responsible for inducting new agency staff at a ward level will be reminded of the need to undertake an appropriate local induction, which should include the checking of identity / identification and appropriate uniform.

Both actions are now complete. An updated Risk Assessment has been issued to the Senior Workforce Manager for Bank and E-rostering, and a copy has been appended to the In-Committee report. The service will now be asked to consider sharing with relevant sub committees.

Action 2, which involved a pro-active exercise, was completed week ending Friday 25 July 2025 and involved both Local Counter Fraud and Nurse Bank visiting key sites where agency and bank workers were due to work over a three-day period. The exercise identified:

- On Wednesday 23 July 2025, 26 Agency / Bank workers were deployed to Prince Philip Hospital. Of these, 18 were HDdUHB Bank Healthcare Support Workers (HCSW), 7 were HDdUHB Bank

Registered Nurses and there was 1 Agency-supplied Registered Nurse. These workers were spread over 12 locations / wards.

Each location was visited and the senior Nurse on duty spoken to. Enquiries revealed that staff had been undertaking ID checks in line with guidance. There were instances where the worker was new to the ward, therefore local inductions were undertaken. Senior staff were aware of recent guidance around the checking of ID and local inductions.

Note: On attending one location, Counter Fraud were advised that the Agency worker on duty was new to the ward and a local induction had taken place. During this process, the Senior Nurse Manager identified that the Agency worker arrived without appropriate workwear and without their physical ID card. This was escalated with Nurse Bank prior to Counter Fraud arrival and further checks made. To mitigate any risks of an unknown person working on site, Counter Fraud undertook further identification checks, and the worker's identity was confirmed.

The agency who allocated the work to the Registered Nurse concerned were contacted and notified of the issue. A reminder was issued to all agencies that, should staff present without physical ID / appropriate workwear, then they would be refused entry onto the ward.

- On Thursday 24 July 2025, 55 Agency / Bank workers were deployed to Glangwili General Hospital. Of these, 28 were HDdUHB Bank Healthcare Support Workers (HCSW), 20 were HDdUHB Bank Registered Nurses and 7 were Agency-supplied Registered Nurses. These workers were spread over 20 locations / wards. The 7 agency-supplied Registered Nurses had all been deployed to Theatres. On visiting the wards / locations concerned, no concerns were identified, and staff were apprised of the need to undertake local inductions for all new agency or bank workers. Upon visiting Theatres, Counter Fraud Identified that of the 7 agency workers, 2 were new to the unit and as such required a local induction, which in line with procedure, would include ID checks.

The unit confirmed that they were aware of this requirement, having received recent communication around the need to undertake local inductions for all new starters; however, on this occasion they had undertaken their own local induction, which did not include the checking of ID.

Subsequent checking of ID was undertaken and both were in order. The Senior Nurse Manager was apprised of events and will now ensure that relevant procedures are followed.

- On Friday 25 July 2025, 27 Agency / Bank workers were deployed to Witherbush General Hospital. Of these, 18 were HDdUHB Bank Healthcare Support Workers (HCSW) and 9 were HDdUHB Bank Registered Nurses. These workers were spread over 11 locations / wards. There were no agency bookings on this date.

Again, on visiting the wards / locations concerned, no concerns were identified, and staff were apprised of the need to undertake local inductions for all new agency or bank workers.

- Counter Fraud have undertaken a review of the Counter Fraud, Bribery and Corruption Policy and amended to include the introduction of the new offence of Failure to Prevent Fraud. Other minor amendments have been made, a summary of which has been documented in a standalone item on the agenda.
- Counter Fraud have assisted in the review of one financial procedure and relevant advice provided.
- To better understand fraud risks, trends and potential areas of further monitoring, Counter Fraud have undertaken an analysis of all referrals, both crime and non-crime recorded and closed across various directorates and departments between the 01 April 2024 and 28 July 2025.

The report includes trends over time, types of allegations received, including the relevant legislation it applies to, subject types, geographic distribution, and breakdowns by directorate and site location. Key insights include:

- A steady number of fraud cases are reported month by month.

	<ul style="list-style-type: none"> ➤ Fraud by False Representation is the most common offence, followed by Theft and Failure to Disclose. Allegation types associated with these referrals include leave related concerns, such as working whilst sick, working whilst on suspension, unauthorised absence, incorrect booking of leave and TOIL abuse. ➤ Employees are the primary subjects in most cases, followed by service users and contractors. ➤ Carmarthenshire accounts for the highest number of cases, followed by Pembrokeshire and Ceredigion. ➤ The Nursing and Midwifery directorate has the highest number of allegations, followed by Estates and Primary Care. ➤ Glangwili General Hospital and Primary Care sites are the most frequently cited locations. <p>A detailed visual breakdown report of allegations by directorate, department and location is included to support future targeted risk mitigation, and has been appended to this report, Appendix A refers.</p> <p>This type of analysis is in its infancy; however, further work will be undertaken throughout the year to improve how these are presented.</p>
<p>Hold to Account</p>	<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.
<p>Strategic Governance</p>	<ul style="list-style-type: none"> • Quarterly statistics have been submitted to Counter Fraud Service (CFS) Wales and in compliance with WG directions.

Report Provided by:
Ben Rees - Lead Local Counter Fraud Specialist
For presentation; 12 August 2025

Report agreed by:
Huw Thomas
Director of Finance



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Hywel Dda
University Health Board

Fraud Case Analysis Report

Executive Summary

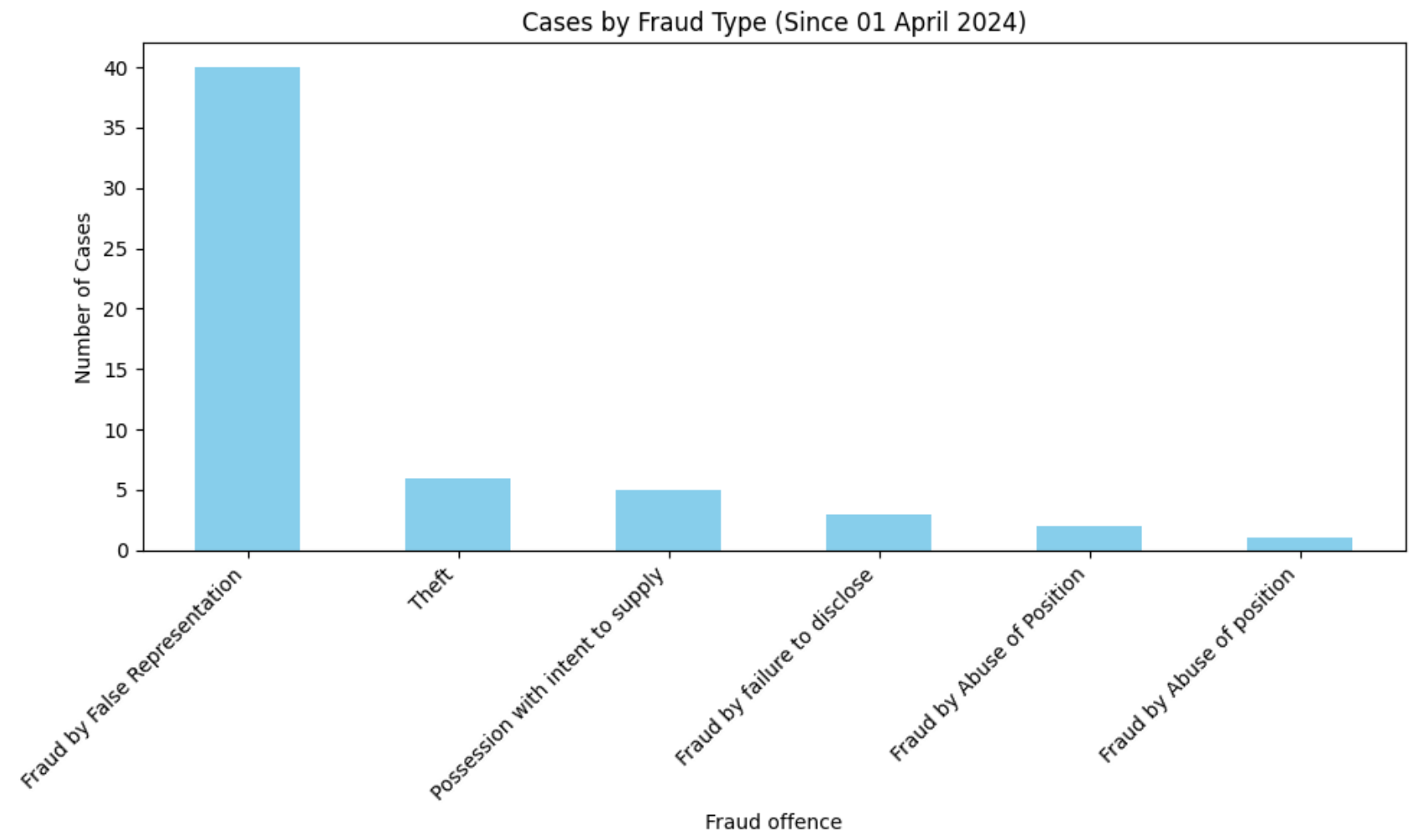
This report provides an overview of fraud cases investigated across various directorates and departments between 01 April 2024 and 28 July 2025. It includes trends over time, types of fraud offences, subject types, geographic distribution, and breakdowns by directorate and site location. The report also highlights specific allegation types and their distribution.

The report only includes details of closed cases, and not all resulted in criminal activity being substantiated. Key insights include:

- A steady number of cases of fraud are reported month by month.
- Fraud by False Representation is the most common offence, followed by Theft and Failure to Disclose. Allegation types associated with these referrals include leave related concerns, such as working whilst sick, working whilst on suspension, unauthorised absence, incorrect booking of leave and TOIL abuse.
- Employees are the primary subjects in most cases, followed by service users and contractors.
- Carmarthenshire accounts for the highest number of cases, followed by Pembrokeshire and Ceredigion.
- The Nursing and Midwifery directorate has the highest number of allegations, followed by Estates and Primary Care.
- Glangwili General Hospital and Primary Care sites are the most frequently cited locations. A detailed breakdown of allegations by directorate/department is included to support targeted risk mitigation.

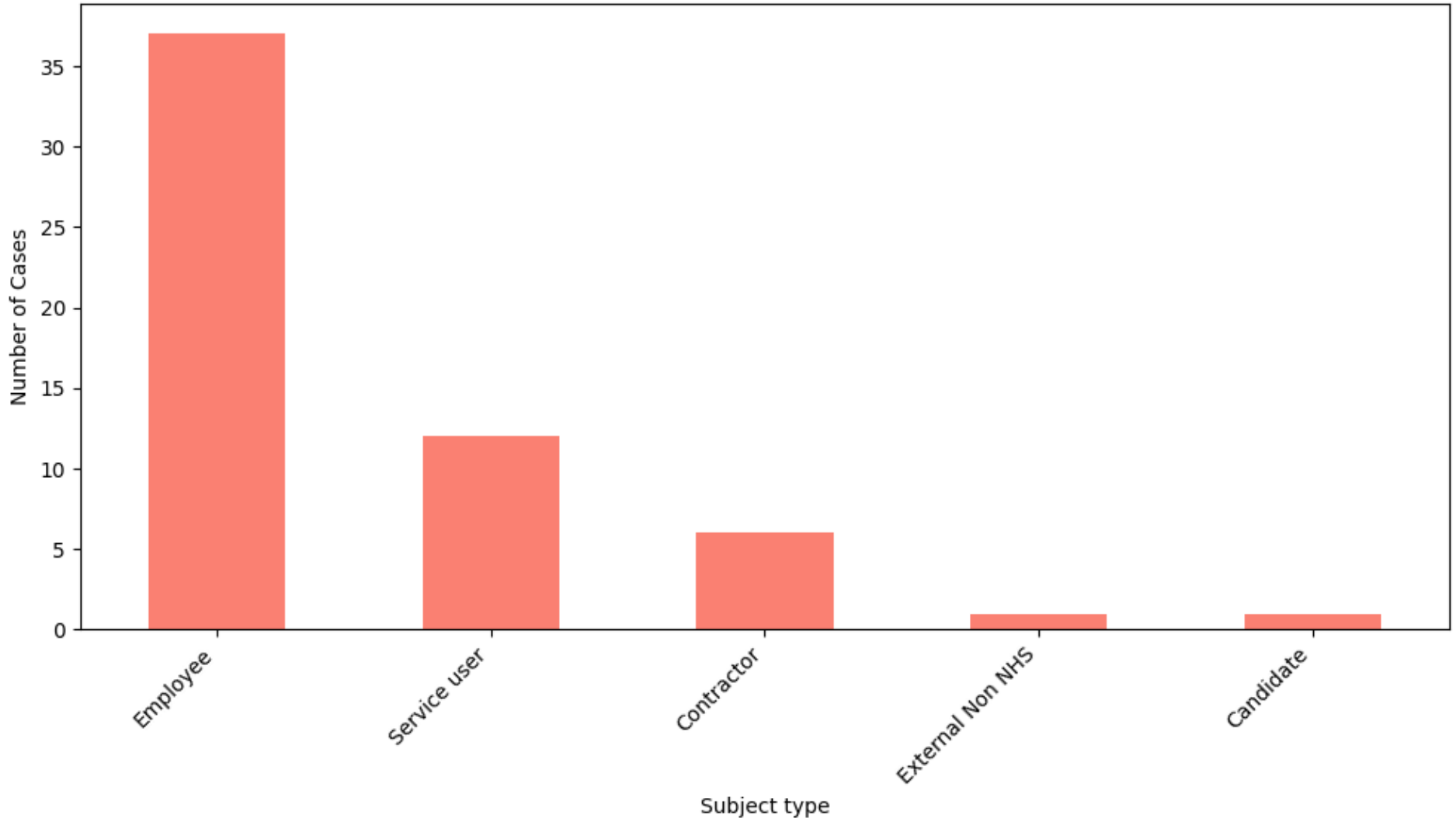
Visual Insights

Cases by Fraud Type

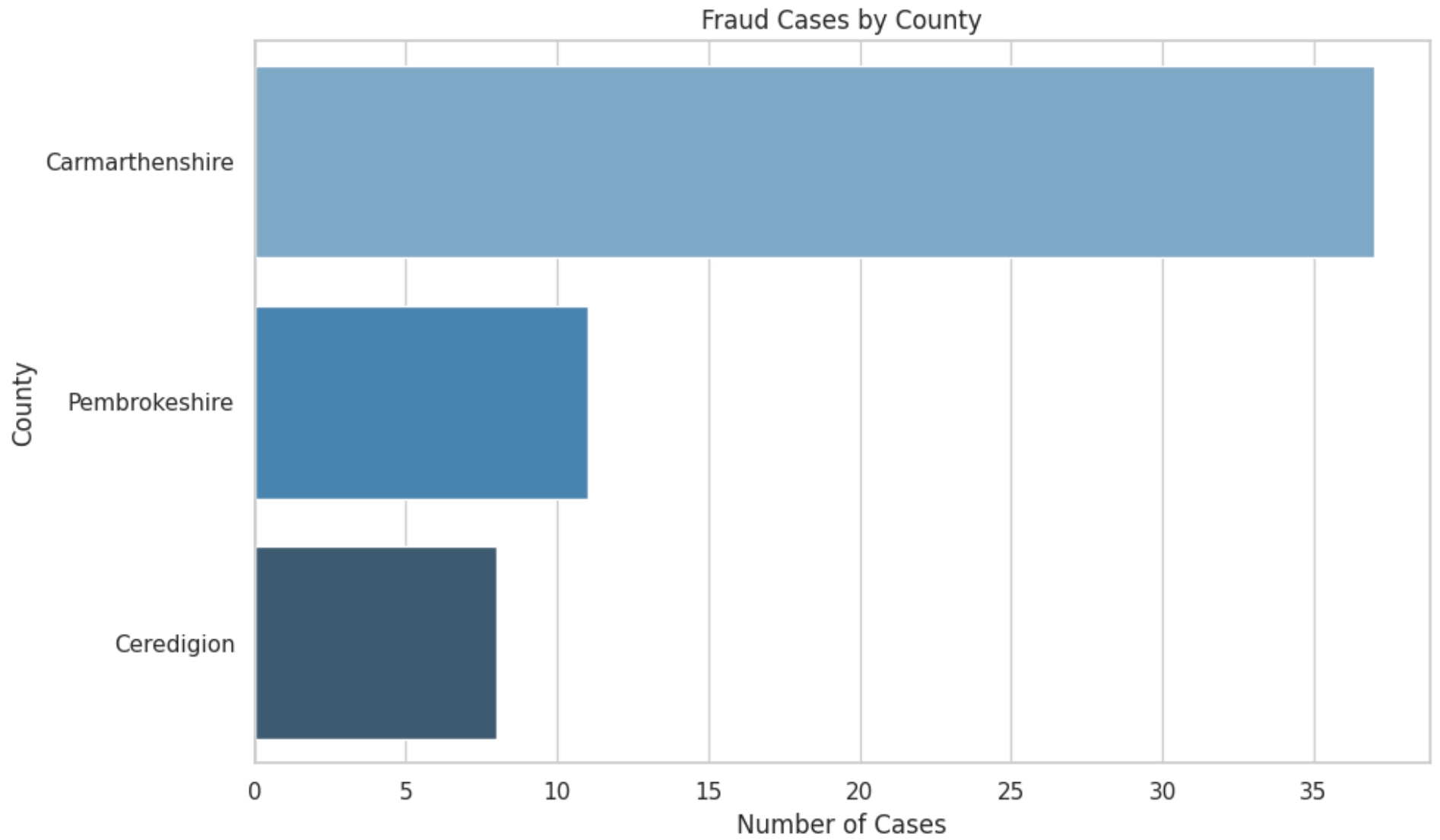


Cases by Subject Type

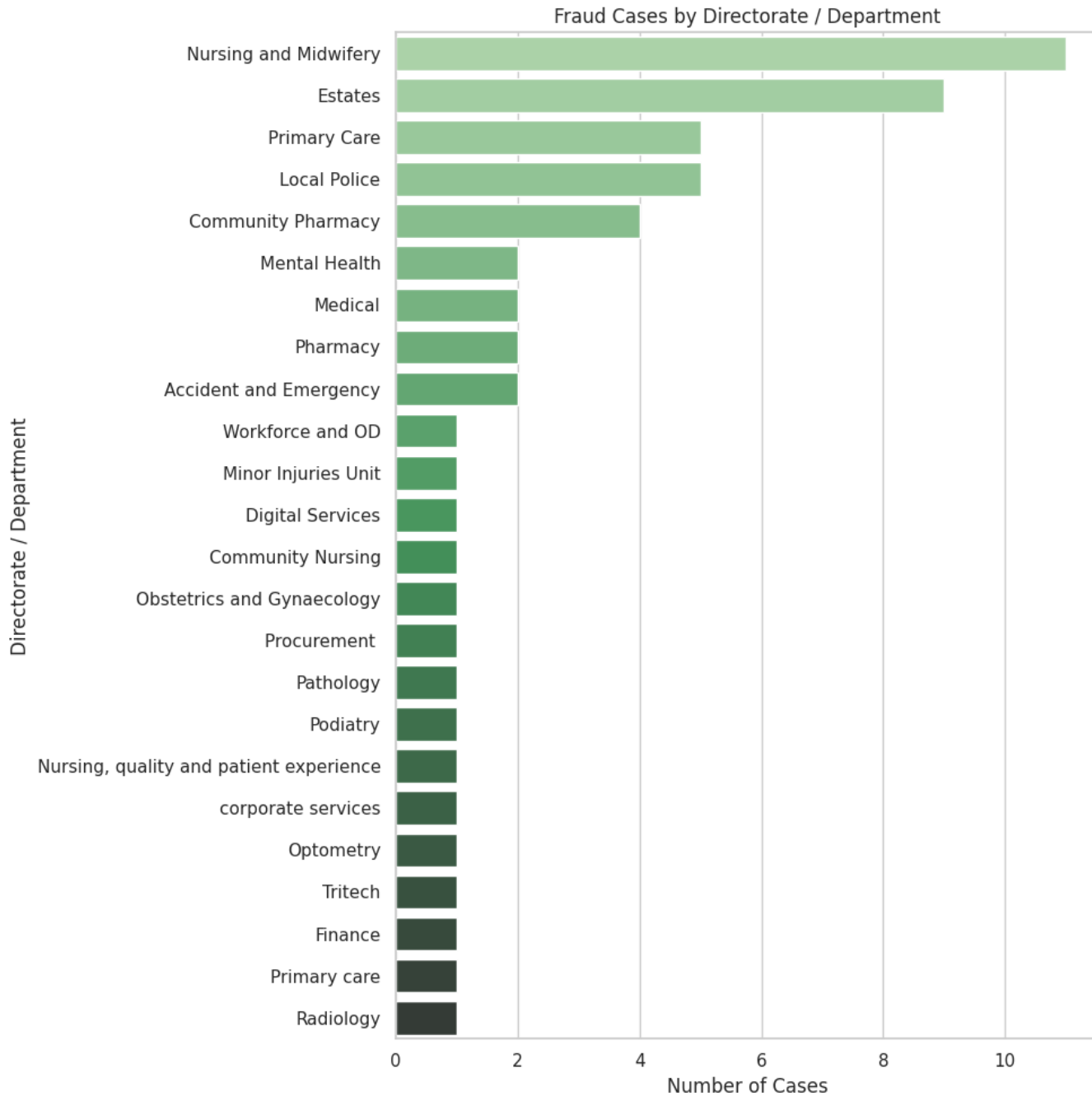
Cases by Subject Type (Since 01 April 2024)



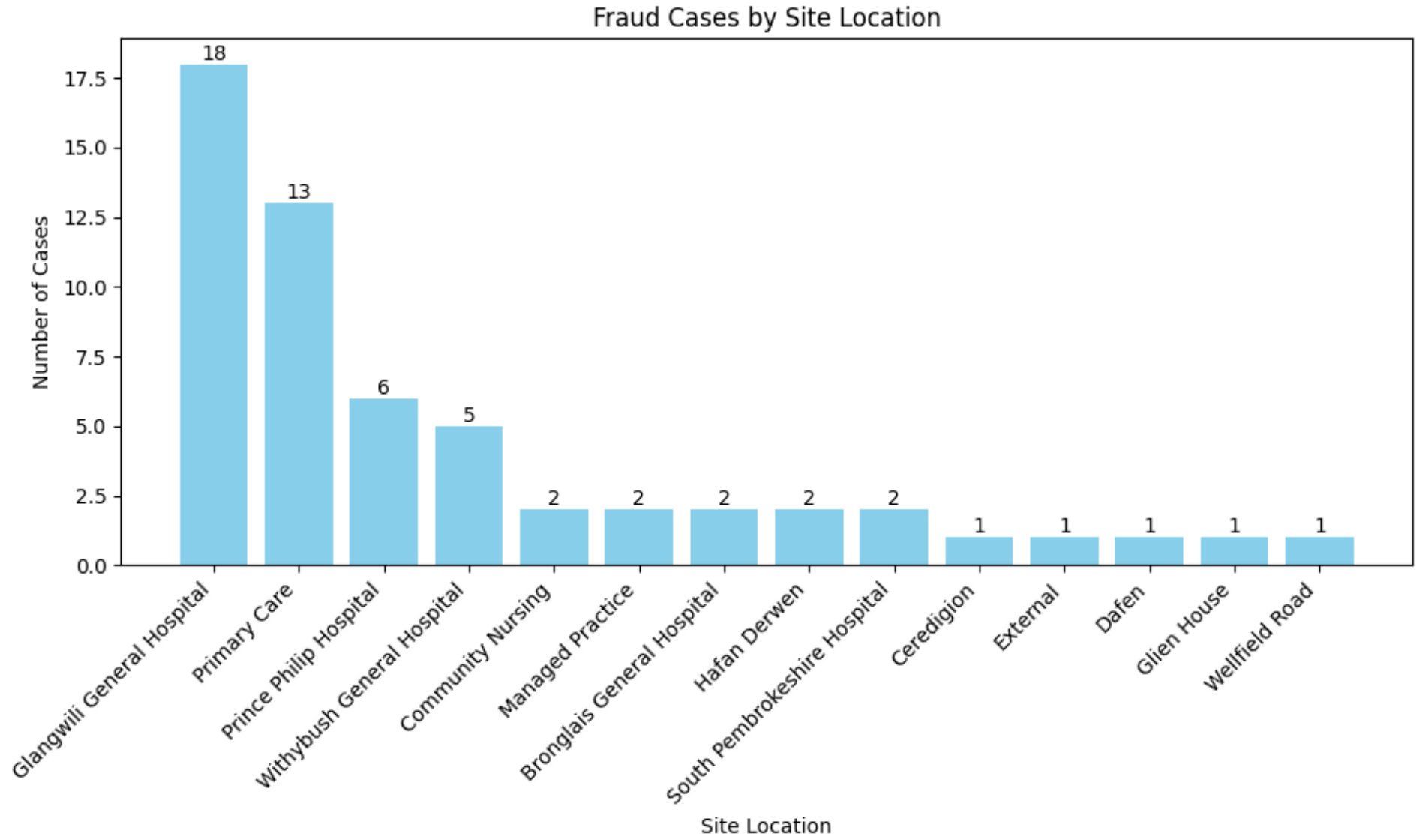
Fraud Cases by County



Fraud Cases by Directorate / Department



Fraud Cases by Site Location



Types of Allegations by Directorate / Department

Types of Allegations by Directorate / Department

