



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

DYDDIAD Y CYFARFOD: DATE OF MEETING:	14 October 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 14 October 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 30/09/2025	Resource Used (%) as at 30/09/2025)
STRATEGIC GOVERNANCE	40	15	38
INFORM AND INVOLVE	85	42	49
PREVENT AND DETER	130	56	43
HOLD TO ACCOUNT	185	75	41
TOTAL	440	188	43

Work Area	Summary of work areas completed
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 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. • Counter Fraud have issued 5 Viva Engage posts, covering various fraud and scam related alerts and news articles covering recent publicised criminal case outcomes. • In response to the National Fraud Initiative and the need to declare secondary interests, a publication was shared via the Health Board’s SharePoint system around the need to declare conflicts of interest, including those linked to secondary employment and associations. A link to the article can be found here: Declarations of Interests - Family members and partners. • A second publication was shared raising awareness of expenses-related fraud, linked to claiming of mileage expenses incurred in connection with employment. A copy of the article can be found here: "Claiming Trouble": When mileage takes a wrong turn • Counter Fraud representatives 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.

Prevent and deter

- In August 2025, Counter Fraud highlighted the reporting of a risk linked to the impersonation of Agency employed Registered Nurses and Healthcare Support Workers. In response, a local proactive exercise was undertaken, which confirmed that existing processes to mitigate the risk were in operation and were effective in reducing the likelihood of an adverse incident. A copy of the report from this exercise has been appended to the In-Committee report. In response to the findings, further risks were identified, relating to identification cards provided to Agency Workers linked to one supplier. Relevant actions were undertaken to address and resolve the issues raised and have been noted within the same report.
- Following a concern raised in connection with the creation of HDdUHB staff identification cards by someone other than the appointed person, a Counter Fraud System Weakness / Risk Identification Report was created and issued to the Assistant Director of People Management and the Executive Director of Allied Health Professions and Health Science. A copy of the report has been appended to the In-Committee report. Recommendations have been made and the risk posed is deemed low.
- Following a concern raised in connection with a stolen prescription from a GP practice in the HDdUHB area, a review was conducted into existing controls governing the storage, control, and destruction of NHS prescriptions. This report has been shared with Primary Care, and a copy of the report has been appended to the In-Committee report. No concerns of fraud were identified.
- Following an investigation into an overpayment of salary, a review into existing controls governing the administration and management of rosters on Allocate was undertaken by way of a local proactive exercise. A copy of the report has been appended to the In-Committee report. No concerns of fraud were identified.
- Following a concern raised in connection with the checking and verification of identification documents produced during the recruitment process, a Counter Fraud System Weakness / Risk Identification Report was created and

issued to the Head of Recruitment and Workforce Equality, Diversity & Inclusion. A copy of the report has been appended to the In-Committee report. Recommendations have been made and the risk posed is deemed low.

- During the reporting period, Counter Fraud have assisted in the review of the Health Board's Standards of Behaviour Policy and a financial procedure governing Patient Property and Money.
- The Public Sector Fraud Authority (PSFA) – part of the UK Government's Cabinet Office and HM Treasury – oversees the National Fraud Initiative (NFI) across the UK. Audit Wales leads the exercise in Wales under the Auditor General's powers in the Public Audit (Wales) Act 2004. The Auditor General's Code of Data Matching Practice summarises the key legislation, and controls governing the exercise in Wales. The Auditor General has mandated that unitary local authorities, NHS bodies, police forces, and fire and rescue authorities participate in the NFI. NFI helps prevent and detect fraud by sharing and matching sets of data electronically. Further information on the initiative can be found here, [National Fraud Initiative | Audit Wales](#).

Final data sets were released in January 2025. Work on the initiative is now nearing completion, with only two matches remaining open, due to ongoing enquiries.

To date, the exercise has assisted in the recovery of approximately £33,000. Further activity around risk identification and the testing of controls associated with the match groups listed below will continue into Quarter 3, with the intention of a final report being presented in Quarter 3.

A breakdown of each exercise and a summary of activity undertaken has been provided below:

Match Type	Purpose of the match	Total Matches	Opened	Reviewed and closed	Remaining	Remarks
Payroll to Payroll	To identify individuals who may be committing employment fraud by failing to work their contracted hours because they are employed elsewhere or are taking long-term sickness absence from one employer and working for another employer at the same time. The criteria for a match are a person having one full-time post plus at least one other post elsewhere.	86	86	84	2	2 enquiries remain open, one of which is linked to an ongoing investigation linked to an offence of Fraud by False Representation. The Health Board is awaiting a response from a third party reference the second open case. and the other is pending finalisation.
Payroll to Pension	To identify cases where employees who have gone back into employment after drawing a pension that could result in an abatement of pension.	110	110	110	0	Enquiries undertaken include working with NWSSP Pensions to ensure each entry is valid and compliant. No issues have been identified, and all matches are now closed.
Payroll to Creditors	The match identifies instances where an employee and creditor are linked by the same bank account or the same address to identify employees with interests in companies with which your organisation is trading. This may indicate potential undeclared interests and possible procurement corruption or where a member of staff has set up a creditor with their own bank details in order to receive payments they are not entitled to.	24	24	24	0	All matches are now complete, resulting in no concerns being identified.

	Payroll to companies' house	To identify potential undeclared interests that have given a pecuniary advantage. To do this NFI have matched payroll data to companies' house information and then to your creditors data. The reports are split between those highlighting employees who appear to be registered directors of companies that the employing body has traded with and those where the employees address appears to have links to the company directors or the company.	49	49	49	0	All matches are now complete, resulting in no concerns being identified.
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. 						

Report Provided by:
Ben Rees - Lead Local Counter Fraud Specialist
For presentation; 14 October 2025

Report agreed by:
Huw Thomas
Director of Finance