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Bwrdd Iechyd Prifysgol
Hywel Dda
University Health Board

Pwyllgor Archwilio a Sicrwydd Risg/ Audit and Risk Assurance Committee

DYDDIAD Y CYFARFOD: DATE OF MEETING:	15 October 2026
TEITL YR ADRODDIAD: TITLE OF REPORT:	Counter Fraud Update
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Huw Thomas, Executive Director of Finance
SWYDDOG ADRODD: REPORTING OFFICER:	Benjamin Rees, Head of Local Counter Fraud Services

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** and **NOTE** the Counter Fraud Update Report and appended items.

Amcanion: (rhaid cwblhau) Objectives: (must be completed)	
Cyfeirnod Cylch Gorchwyl y Pwyllgor: Committee ToR Reference:	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, Teitl a Sgôr Risg 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:	Not Applicable
Nodau Cynllunio 2026/27 Planning Goals 2026/27	Not Applicable
Hypergyswllt i Amcanion Llesiant HDdUHB 2026 Hyperlink to HDdUHB Well-being Objectives 2026	10. Not Applicable
Model Cymdeithasol ar gyfer Iechyd a Llesiant: (wedi'i gwblhau ar gyfer	Not Applicable

newid strategol a/neu newidiadau sylweddol i wasanaethau) A Social Model for Health and Wellbeing : (complete for strategic change and/or significant service changes)	
Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	Not Applicable
Rhestr Termau: Glossary of Terms:	Not Applicable
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y cyfarfod hwn: Parties / Committees consulted prior to this meeting:	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
Tegwch Iechyd: Health Equity:	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

Audit and Risk Assurance Committee 15 October 2026

For clarity of reporting, the Counter Fraud Workplan has been structured around the key areas of activity aligned to the NHS Counter Fraud Authority's framework. These are summarised as follows:

- **Pro-active related activity** (Previously Prevent and Deter, Inform, and Involve and Strategic Governance)
- **Reactive related activity** (Previously Hold to Account)

Overall resource utilisation remains broadly proportionate at this stage of the reporting period, with 211 days recorded against the 440-day annual plan as of 30 September. Activity continues to be balanced across proactive prevention, deterrence and awareness work, alongside reactive investigation activity.

AREA OF ACTIVITY	2026/27 Resource (days)	Resource Used as at 30/09/2026	Resource Used (%) as at 30/09/2026)
PRO-ACTIVE RELATED ACTIVITY	255	119 Days	47%
REACTIVE RELATED ACTIVITY	185	92 Days	49%
TOTAL	440	211 Days	48%

Work Area	Summary of work areas completed
Pro-active related activity	• 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 and to new students via Aberystwyth University. • Counter Fraud delivered a fraud awareness session to Royal College of Nursing members at their local AGM. The session outlined the role of the service, how members can help prevent and report fraud, and the risks associated with working multiple jobs, working while on sick leave and failing to submit declarations of interest. The presentation was well received and reinforced the importance of declaring potential conflicts of interest and complying with Health Board policies and procedures. • Counter Fraud currently participates in the quarterly HDdUHB Local Intelligence Network (LIN), where advice is provided on current fraud trends associated with controlled drugs. Where relevant, the team also provides wider advice to raise awareness of fraud risks within the NHS. • October will see the exchange of data between Hywel Dda University Health Board / NHS Wales and the National Fraud Initiative. To that end, relevant privacy notices have been issued to staff via Viva Engage, Payroll Messaging and the Health Boards intranet site. Further details on the initiative can be accessed here: National fraud initiative (NFI). In addition, a copy of the privacy notice issued by Audit Wales has been appended to this report, Appendix A refers. • The department continue to provide regular news bites to staff via the viva engage platform, the most recent highlighting a case where an individual was convicted for an offence of personating a medical professional. • To strengthen controls and reduce the risk of employees working while on sick leave, Counter Fraud has been authorised to review and fraud-proof sickness absence documentation. Proposed amendments will prompt

	employees to declare secondary employment or other relevant interests at the start of an absence. Where a potential conflict is identified, employees will be reminded of their obligations under their contract of employment, where applicable, and the Health Board's Standards of Behaviour Policy. The revised forms are intended to encourage more open and effective dialogue between employees and their supervisors or line managers. - Three proactive exercises have commenced, all of which will focus on procurement and risks associated with: 1 – Procurement conflicts and compliance: Assurance that conflicts of interest are declared and managed, and procurement thresholds, approvals and framework requirements are followed. 2 – Capital assets: Assurance that capital procurement and asset controls protect public funds and assets, with weaknesses or potential fraud escalated appropriately. 3 – Construction frameworks: Assurance that contracts over £25,000 are transparently and properly awarded, distinguishing administrative issues from control failures or potential fraud and corruption. Further information on the exercises has been provided within the in-committee paper.
Reactive related activity	New referrals have been received by the department over the last two months, with significant work undertaken to progress those matters. A detailed report covering all new, existing, and closed investigations has been provided to the Committee separately through the In-Committee report.
Strategic Governance	- Quarterly statistics have been submitted to Counter Fraud Services Wales in accordance with Welsh Government directions. - On 22 January 2026, the NHS Counter Fraud Authority (NHSCFA) conducted an engagement visit with HDdUHB Counter Fraud. NHSCFA representatives met with the Chair of the Audit and Risk Assurance Committee, the Executive Director of Finance, the Director of Corporate Governance/Fraud Champion and the Counter Fraud Team. The visit assessed compliance with the GovS 013 NHS Requirements, explored how NHSCFA and the

Fraud Hub could support the Local Counter Fraud Service and the Health Board, and identified good practice for sharing across the sector. The findings were subsequently reported to relevant stakeholders.

The final report has now been received and shared with the Chair of the Audit and Risk Assurance Committee, the Executive Director of Finance, the Director of Corporate Governance/Fraud Champion and the Counter Fraud Team. The relevant recommendations have been recorded and are being tracked, with the following management response noted:

The Counter Fraud Department welcomes the thematic engagement findings and accepts the recommendations. The first two recommendations have been implemented.

The Local Counter Fraud Service has adopted the Government Counter Fraud Profession fraud risk assessment methodology, providing a consistent, evidence-based approach to identifying, assessing, and managing fraud risk. NHSCFA guidance is now used to plan, undertake and record Local Proactive Exercises. To support this work, both HDdUHB Local Counter Fraud Specialists recently completed a Counter Fraud Authority programme leading to certification as Government Counter Fraud Professionals. The Health Board currently requires completion of the ESR fraud awareness e-learning module on a “one in, one out” basis. However, it will consider reintroducing the module on a three- or five-year revalidation cycle, taking account of organisational training priorities and the need to maintain an appropriate baseline of fraud awareness.

A copy of the final report has been appended to this report, Appendix B refers.

Report Provided by:

Benjamin Rees – Head of Local Counter Fraud Services

For presentation: 15 October 2026.

Report agreed by:

Huw Thomas

Executive Director of Finance

Date issued: June 2020

Data Matching Privacy Notice

This notice tells you about how your personal information is processed in connection with the Auditor General for Wales' data matching exercises, which include participation in the data matching exercises conducted by the National Fraud Initiative (NFI).

The Data

The information to which data matching relates is personal information that you provide when:

- Making a claim or applying for:
 - personal budget/social care
 - pension
 - taxi driver licence
 - market trader licence
 - personal alcohol licence
 - social housing (current tenants and individuals on a housing waiting list)
 - right to buy (completed and in progress)
 - transport pass and permit
 - council tax reduction scheme
 - blue badge
 - state benefits, including universal credit and housing benefit
 - COVID-19 support payments or grants
- Seeking payment of an invoice from an organisation that takes part in the NFI. This is referred to as trade creditor standing and payment history data.
- Seeking payment for employment from an organisation that takes part in the NFI. This is referred to as payroll data.
- Registering to vote. This is referred to as Electoral Register data.

We also process information that you provide in relation to:

- Your council tax.
- Your business rates.
- Residents in a private care home supported by an organisation that takes part in the NFI.

Data specifications providing more information about the data we process in the above areas can be accessed on our website.

Criminal Convictions

If data matching through the NFI results in a prosecution, then this may also be recorded by participating organisations.

Special Categories of Personal Information

Some special categories of personal information (sensitive personal data) are included in the above.

Housing benefit and student loan data includes an indicator of physical or mental health or condition. This disability flag, which does not identify the specific condition, is required as disability has an impact upon a student's entitlement to claim housing benefit.

The personal budget (direct payment) match uses data relating to individuals who have a specified range of social care needs because they have a particular disability.

We collect information on blue badge holders (and applicants). While we do not hold information on the medical condition that entitles the individual to a badge we do know who has a badge.

Where personal data have not been obtained from you, your personal data were obtained by us from participants including local authorities, police forces fire authorities, NHS bodies, the Welsh Government, the Wales Audit Office and some housing associations and Welsh government sponsored bodies.

This notice tells you about how your personal information is processed in connection with the Auditor General for Wales' data matching exercises, which include participation in the data matching exercises conducted by the National Fraud Initiative (NFI).

Purpose

In accordance with statute, the Auditor General for Wales (the Auditor General) conducts data matching exercises to assist in the prevention and detection of fraud.

What is done with your data

Data matching involves comparing sets of data, which includes your data, such as the payroll or benefits records of a body, against other records held by the same or another body to see how far they match. The data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency that requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

All bodies participating in the Auditor General's data matching exercises receive a report of matches that they should investigate, to detect instances of fraud, over- or under-payments and other errors, to take remedial action and update their records accordingly.

This notice tells you about how your personal information is processed in connection with the Auditor General for Wales' data matching exercises, which include participation in the data matching exercises conducted by the National Fraud Initiative (NFI).

Legal Basis of Processing

The processing of data (including special category data) by the Auditor General for Wales in a data matching exercise is carried out under his statutory powers in the Public Audit (Wales) Act 2004. It does not require the consent of the individuals concerned under data protection legislation.

In the case of sensitive personal data, it is processing which is necessary for reasons of substantial public interest for the exercise of a function of the Auditor General.

The legal basis for processing criminal convictions data is paragraphs 6 and 10 of schedule 1 to the Data Protection Act 2018.

Further information about the Auditor General's powers is set out in his Code of Data Matching Practice which is available on our website.

Recipients

Your personal data will be shared by us as necessary for the purposes of preventing and detecting fraud with equivalent audit bodies in Northern Ireland and Scotland, the Cabinet Office in England and the bodies who participate in data matching exercises on a mandatory or voluntary basis, such as local authorities and NHS bodies, central government departments and private sector organisations such as the Insurance Fraud Bureau and credit reference agencies.

Disclosures are made by the Auditor General in accordance with the relevant statutory provisions in sections 64D and 64E of the Public Audit (Wales) Act 2004.

We may share records containing personal data with HMRC. These will be matched against HMRC records and additional HMRC information appended and returned. The HMRC matching will seek to identify persons at the address provided and relevant income related information.

National Fraud Initiative (NFI)

Information about the NFI is set out in **Appendix 1** of the Auditor General's Code of Data Matching Practice which is available on our [website](#).

Retention

Your personal data will be kept by us for the periods set out in our Documents and Records Management Policy, and in relation to the NFI for the periods specified in the Cabinet Office Data deletion Schedule which is available [here](#).

Your Rights

You have the right to request information about how your personal data are processed, and to request a copy of that personal data. You have the right to request that any inaccuracies in your personal data are rectified without delay. You have the right to request that your personal data are erased if there is no longer a justification for them to be processed. You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

The processing of your data is necessary for reasons of substantial public interest in the exercise of official authority vested in the Auditor General for Wales and other data matching controllers. You have the right to object to the processing of your personal data on grounds relating to your particular situation. If you object, we must demonstrate compelling legitimate grounds for the processing.

Contact Details

If you wish to discuss any objections or concerns, or obtain a copy of the current personal information held about you, please write to:

Martin Peters

Data Protection Officer

Wales Audit Office

24 Cathedral Road

Cardiff

CF11 9LJ

or by email to: infoofficer@audit.wales

Any questions about data matching exercises should be addressed to:

NFI Co-ordinator

Wales Audit Office

24 Cathedral Road

Cardiff

CF11 9LJ

Or by email to: nfi@audit.wales

The Information Commissioners Office

If you require further information in relation to your rights under data protection law or want to complain about with how we are handling your personal data, you may contact the Information Commissioner at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

email: casework@ico.gsi.gov.uk

Thematic Engagement Exercise – Hywel Dda University Health Board

August 2026

Version 1.0

**Working together, to find,
report and stop NHS fraud**
Report NHS fraud
0800 028 4060
www.cfa.nhs.uk/reportfraud



Version control

Version	Name	Date	Comment
0.1	Ruth Barker-Jones	July 2026	Initial version
0.2	Fiona McIlwraith	July 2026	Comments
1.0	Ruth Barker-Jones	August 2026	Draft version
2.0	Ruth Barker-Jones	September 2026	Final version

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Executive summary

Background

The NHS Counter Fraud Authority (NHSCFA) is a Special Health Authority, established on 1 November 2017 and charged with identifying, investigating and preventing fraud within the NHS and the wider health group. The NHSCFA is independent from other NHS bodies and is directly accountable to the Department of Health and Social Care.

In Wales, the NHSCFA provides specialist counter fraud support functions to the Welsh Government under section 83 of the Government of Wales Act 2006. On 1st November 2017, a new section 83 arrangement was finalised and signed by both parties following the establishment of the NHSCFA.

Since April 2021, all NHS funded services have been required to provide assurance against the Government Functional Standard GovS 013: Counter Fraud to the DHSC and the Public Sector Fraud Authority. To enable NHS funded services to meet the Government Functional Standard, the NHSCFA released a suite of NHS requirements in January 2021. These requirements provide a detailed description of the necessary counter fraud arrangements and how to meet them to comply with the Functional Standard, and organisations are required to provide an annual statement of compliance with the twelve NHS requirements via an on-line Counter Fraud Functional Standard Return (CFFSR).

In April 2023, the NHSCFA created the Fraud Hub. The purpose of the Fraud Hub is to provide a gateway to a range of support services for the whole counter fraud community working across the NHS and seeking to bring the national and local counter fraud response together to work in partnership. The Fraud Hub consists of four teams. Engagement, Enforcement, Prevention, and the CLUE team. The four teams work independently to support LCFS with specific requirements and are also able collaborate to support LCFSs and organisations in delivering a comprehensive counter fraud service and achieving outcomes. The learning academy has also recently been created within the Fraud Hub, but at the time of publishing this report is in the process of being established.

The Fraud Hub Engagement team developed a workstream to actively support some of the largest health bodies based on the size of annual budget and resulting inherent risk. The aim of this programme of work was to offer health bodies and LCFSs the opportunity to collaborate with the Fraud Hub and wider NHSCFA to use its resources to develop existing working practices where necessary and share good practice identified.

The purpose of the workstream and engagement visits is to explore where the Fraud Hub can collaborate to better support ongoing counter fraud work, within the organisation and across the sector. Organisations were selected for this engagement based on meeting budgetary criteria and not yet receiving an engagement visit.

Summary of Findings

We would like to thank Hywel Dda University Health Board (the organisation) for their hospitality and professionalism during this exercise. Ruth Barker-Jones and Gareth Williams, Senior Fraud Hub Engagement Officers visited the organisation on 22nd January 2026.

During the engagement visit, we spoke with Ben Rees as the Head of Local Counter Fraud Services and LCFS Terry Slater, as well as Huw Thomas as Executive Director of Finance (DoF) and Rhodri Evans as Audit Committee Chair (ACC), and Director of Corporate Governance and nominated Counter Fraud Champion (CFC) Joanne (Jo) Wilson.

The nature of the visit was to establish how NHSCFA, with the resources available, can support the LCFS and organisation's approach to counter fraud, with consideration to the fraud risks associated with a significant budget, in excess of £1 billion. It was also an opportunity to identify good practice at the organisation, which the NHSCFA can publicise to support other LCFSs and organisations across the sector in their continued work to counter fraud.

In advance of the visit, we reviewed data available to us through documentation shared by Ben, information as submitted in the most recent Counter Fraud Functional Standard Return and data contained within the NHSCFA approved case management system, Clue.

Ben advised of considerable support for counter fraud within the organisation, including good working relationships with all key individuals and contacts, benefitting all elements of counter fraud work. Positive relationships with the nominated individuals were noted, as well as finance and HR teams. In particular, Jo's counter fraud experience is clearly invaluable in her ability to effectively support the counter fraud team.

As part of the engagement visit, we considered fraud risk assessments (FRAs), system weakness reporting (SWRs) and proactive work carried out at the organisation, starting with FRAs and specifically how they underpin and inform the local proactive work carried out. We discussed the organisation's approach to counter fraud as increasingly and encouragingly proactive in nature, focussing on identifying weaknesses that enable fraud, improving controls and reducing opportunities for fraud to be committed.

We discussed the organisation's perceived fraud risks and fraud risk assessment (FRA) work in detail, with Ben demonstrated to us the system on which fraud risks are recorded and monitored for the organisation, which appears ideal for the purpose.

Ben raised the possibility of recording risks and associated FRAs on Clue as LPEs, with a view to the risk remaining open long-term as actions develop, to enable a record and long term monitoring of actions taken and resulting outcomes. Whilst action taken to reduce or mitigate a risk is likely to be appropriate for recording as an LPE on Clue, it is not recommended for this to remain open indefinitely, but rather scoped out as a defined

exercise based on the risk's current assessed position at the commencement of the activity and closed once the exercise is concluded.

There would be benefit in reviewing the LPE guidance published by NHSCFA to support LPE work and the FRA guidance shared and discussed at the workshop Ben attended in April to ensure the two are appropriately linked but distinct.

We discussed the variety of mechanisms in place to support fraud awareness in the organisation, from e-learning and targeted training to a social media style communication platform called Viva Engage, demonstrating means to communicate with staff at all levels. We also discussed that whilst the e-learning module is mandatory for all staff, it is not currently agreed as ongoing training. We recognise the challenges of the time required to complete mandatory training; however, this is a very effective tool to deliver and maintain a baseline of awareness for staff and as such, it is recommended that further consideration is given to establishing the ESR fraud awareness e-learning module as recurrent training.

The organisation's desire to develop its counter fraud resource was clear, with interest to expand into data analytics opportunities. This could be an excellent opportunity to design the counter fraud team for resilience in the future, and findings from NHSCFA's Project Athena and Project Wise would be a useful resource as it develops.

Next Steps

The NHSCFA shares this report with the organisation and LCFS with the expectation that the recommendations made for the organisation will be used to develop an action plan for implementation. The action plan should be presented to Audit Committee with progress against the action plan subject to monitoring by the Audit Committee until all actions have been fully implemented.

The NHSCFA will assist and continue to provide support to organisations as required to drive up standards and reduce the risk of fraud occurring and can be contacted directly for support in implementing the action plan resulting from this report.

Purpose

The purpose of the engagement visit was to explore how NHSCFA, with the resources available, can support the LCFS and in turn the organisation. The engagement was also an exercise to identify any barriers to conducting effective counter fraud work.

The aim of this workstream is to collaborate to identify potential opportunities to achieve improved outcomes as well as supporting the ongoing work being conducted.

It was also an opportunity to identify good practice at the organisation, which the NHSCFA can publicise to support other LCFSs and organisations across the sector in their continued work to counter fraud.

Methodology

Scope / Out of Scope

The selection of organisations for the purposes of this engagement were based on risk analysis from the data recorded on Clue (approved NHS case management system) and the CFFSR data return for 23/24 and 24/25, focussing on organisations within Wales with a budget exceeding £1 billion.

Organisations were selected for this engagement based on meeting budgetary criteria and not yet having received an engagement visit.

Organisation Overview

Hywel Dda University Health Board is responsible for planning and providing NHS services for almost 385,000 people across Carmarthenshire, Ceredigion and Pembrokeshire.

The organisation employs over 13,000 staff, delivering primary, community, acute, mental health and learning disability services.

The counter fraud service is provided by LCFS directly employed by the organisation. At the time of reporting, the counter fraud service consisted of Ben Rees as the Head of Local Counter Fraud Services, supported by LCFS Terry Slater.

Stakeholder Findings

On Thursday 22nd January, Ruth Barker-Jones and Gareth Williams, Senior Fraud Hub Engagement Officers, visited Hywel Dda University Health Board and met with Ben Rees as the Head of Local Counter Fraud Services and LCFS Terry Slater. We then met with Huw Thomas as Executive Director of Finance (DoF) and Rhodri Evans as Audit Committee Chair (ACC), as well as Director of Corporate Governance and nominated Counter Fraud Champion (CFC) Joanne Wilson.

In advance of the visit, documentation including the organisation's fraud risk assessments (FRAs), counter fraud work plan, annual report and progress reports were requested to enable review to support meaningful discussions during the visit. We also reviewed data submitted in the most recent Counter Fraud Functional Standard Return and contained within the approved case management system, Clue.

We first met with Ben and Terry to gain an understanding of the organisation's current counter fraud position and LCFS resource.

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Ben advised of considerable support for counter fraud in-house, including good working relationships with all key individuals and contacts. The counter fraud team is particularly well embedded with the finance team as, at the time of the visit, their office was based in the same building as finance, which has facilitated invitations to attend and present at finance events to raise awareness. Plans were in motion to move the team into a new building alongside all admin staff, which it is anticipated will further develop relationships with those teams.

We discussed the organisation's perceived fraud risks and fraud risk assessment (FRA) work in detail, with Ben demonstrated to us the system on which fraud risks are recorded and monitored for the organisation. The system facilitates the assigning of risk owners, facilitating monitoring of individual risks and any actions tasked as a result of LPE activity. Ben further advised that risk owner actions are also subject to monitoring by audit committee.

Ben raised the possibility of recording risks and associated FRAs on Clue as LPEs, with a view to the risk remaining open long-term as actions develop, to enable a record and long term monitoring of actions taken and resulting outcomes. Whilst action taken to reduce or mitigate a risk is likely to be appropriate for recording as an LPE on Clue, it is not recommended for this to remain open indefinitely, but rather scoped out as a defined exercise based on the risk's current assessed position at the commencement of the activity and closed once the exercise is concluded.

There would be benefit in reviewing the LPE guidance published by NHSCFA [Guidance for planning, designing, and conducting Local Proactive Exercises](#) to support LPE work and ensure it is informed by but distinct from FRAs.

A workshop on fraud risk was held following the visit, led by the NHSCFA's fraud risk lead and hosted by the Wales CFS, to support with LCFS knowledge and understanding of the FRA process as it develops within the organisation and was attended by Ben and will be valuable to consider as the FRA develops.

In respect of recording fraud risks and FRAs, the most appropriate approach is to follow the organisation's own fraud risk management policy, using established risk management systems and assigning risk owners responsible for the relevant areas to monitor their own risks. The risk system Ben showed us is ideal for this purpose, and it would not be necessary to duplicate the recording of those risks on Clue, particularly as the risk owners would not have access to view them.

We discussed fraud awareness arrangements in the organisation, with Ben advising that whilst the ESR fraud awareness e-learning module is in use and set up as mandatory training, there is currently no requirement for the training to be renewed. Ben advised it was initially set up to require renewal every three years, but as the training is not frequently updated, it was ultimately decided that the training would remain mandatory but no longer require renewal.

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We recognise the challenges of the time required to complete recurring mandatory training; however, this is a very effective tool to maintain a baseline of awareness for staff in a position to identify and report instances of fraud, which is only possible if they're able to understand and recognise it as such. It is recommended that further consideration is given to establishing the ESR fraud awareness e-learning module as ongoing rather than one-off mandatory training.

To mitigate the risk of employees' knowledge and awareness diminishing over time, Ben advised awareness sessions are regularly provided to a range of working groups. The sessions are often also a recommendation following the closure of a case, as a future deterrent measure. In addition, the organisation also uses a social media style communication platform called Viva Engage to support with raising fraud awareness with staff through news briefings, with Ben reporting good levels of interaction. This is beneficial as a supporting means of communicating counter fraud messaging but is not an alternative for ongoing, organisation-wide, training.

Ben further advised he has arranged for some specific training on immigration through the Home Office, bringing the identification of a gap in knowledge following a concern together with a relevant contact from a presentation at an LCFS forum organised by the CFS Wales. Targeted training in high fraud risk areas, particularly where concerns have been identified, is a valuable tool to improve awareness and manage fraud risks.

Ben raised an issue with Wales data not being shared in Clue, for example, where a subject is investigated elsewhere in Wales and a joint investigation might be appropriate. This is not an uncommon occurrence with neighbouring health boards and Ben understands Welsh Government Directions means Wales-wide data sharing agreements are already in place but not enacted through Clue. We agreed to make enquiries on this and established there are limitations with the parameters within Clue that make this more complex than it appears. As the CFS Wales has oversight of all investigations, they are in a position to identify and link investigations with the same subject.

We discussed the good relationship between the counter fraud and workforce teams, comprising monthly meetings, regular communication and advice requests, as well as arrangements for use of HR meeting rooms to conduct interviews under caution (IUCs). This relationship has been developed over time, moving away from the HR team screening concerns and commencing internal investigations before referral to the counter fraud team, so it is encouraging to learn communication has improved substantially and investigations now commence in parallel.

We also discussed the working relationship with Huw, which Ben advised was positive, with Huw very receptive to counter fraud. Occasionally, Huw receives referrals directly, which are passed to Ben. Huw has also supported the team in escalating issues of non-response to actions across the organisation and externally, for example, chasing up data access requests. Ben is assured of further escalation opportunities through audit committee, where necessary.

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Additionally, Ben advised Jo is very supportive in her role as CFC, facilitating challenging discussions or contentious issues where this might be beneficial. Jo has previously worked as an LCFS and therefore has an operational understanding of some of the challenges an LCFS faces, which is advantageous in her role as CFC.

Ben's role of Head of Local Counter Fraud Services is line managed by the Assistant Director of Finance, who whilst outside of the formal nominated counter fraud roles, Ben advises is supportive and agreeable to assist as required.

We considered the organisation's counter fraud resource, which Ben is broadly satisfied is adequate; however, advised there is discussion around the potential of recruiting a band 5 local counter fraud technician with a data analytics focus. Huw has an interest in this area and is keen to develop data analytics capacity to advance counter fraud activity within the organisation.

As we concluded our discussions, Ben and Terry offered positive feedback on the programme of webinars and drop-in sessions co-ordinated by the NHSCFA's Fraud Hub, in terms of frequency and content covered. This feedback is very helpful and will assist us to ensure the programme remains relevant and valuable to the LCFS community.

We then met with Jo Wilson, who provided more detail of her previous roles as an LCFS in England and for NHS England. It was clear this background in counter fraud has made Jo a valuable asset in supporting the counter fraud team.

Specifically, Jo discussed a fraud referral received against Huw, alleging preferential treatment of a patient, which could have been contentious. As CFC, Jo supported Ben to pursue, specifically by providing an alternative reporting route given the conflict in normal reporting arrangements and the position of influence of the subject. Jo confirmed that following enquiries undertaken, no further action was required but commented on Huw's openness with regard to the allegation. Jo's experience and support during this investigation was clearly of significant value to Ben.

Jo also advised she has supported Ben with action in response to some immigration concerns, which resulted in arranging for a contact from the Home Office contact to present to improve awareness and understanding around this risk area.

We then discussed the organisation's support for counter fraud, with Jo advising counter fraud access to non-executives is well established, with annual, scheduled meetings without inviting officers. This follows the process required by many of the organisation's regulators and is valued by both audit committee members and the counter fraud team, as an opportunity to discuss activity and performance. Through these meetings, audit committee have requested the introduction of an action tracking mechanism to support with completion of agreed counter fraud actions, which has been beneficial as it facilitates follow up action where necessary.

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Overall, Jo provided positive feedback for Ben and Terry as the organisation's counter fraud team, specifically stating both are agreeable to change to achieve desired outcomes, for example through softening language used in letters relating to fraud investigations and related communications, to ensure they are more personable rather than distressing for recipients.

We then met with Huw and Rhodri, who elaborated further on the selection process that resulted in Jo taking on the role of CFC. In addition to Jo's experience with counter fraud, the organisation undertook a True North exercise, to better understand their position from an ethical, whistleblowing and raising concerns perspective, which identified Jo as a good fit for this role.

We discussed the organisation, with Huw describing the complexities of providing all elements of primary and secondary care, as well as challenges stemming from the geographical area, which is significant and covers a large and remote area, which increases risks in terms of reduced control. Rhodri added the organisation has numerous challenges and risks in respect of counter fraud, but he is satisfied the Ben approaches and manages these appropriately.

Rhodri advised he attends meetings of audit committee chairs across Wales and recognises national and local fraud trends discussed. Ben's position as the counter fraud lead is elevated by establishing regular discussion with the ACC, not restricted to audit committee meetings. Both Huw and Rhodri confirmed they are confident and willing to challenge, where needed.

Rhodri also discussed his view of the organisation against his experience with local government, commenting on the comparative transparency within the organisation, which he views as very positive. This is supported by mechanisms within the organisation that contribute to the counter fraud position, such as mandatory declarations of interest for high risk teams and training for all independent members.

Huw discussed his awareness with the review of LCFS arrangements in Wales, and the potential drive for regional joint working. At present, there seems little development or change and as such, it is not possible to propose action until more information is shared.

Huw also raised concern about the length of time taken for investigations undertaken by CFS Wales to conclude. Delays with investigations submitted to CPS is a common issue and NHSCFA is in communication with CPS to establish opportunities to minimise delays where possible.

We discussed the annual self-assessment against the NHS Requirements, the CFFSR, with Huw and Rhodri confirming they do not feel the need for all requirements to be rated green. Instead, they are satisfied to use amber or red ratings as a development opportunity, where this is more appropriate. This is an excellent approach as it drives improvement where areas for improvement are identified.

Huw raised the possibility of sharing examples of good practice linked to the requirements. Unfortunately, it is not possible to share full, prescriptive, examples of what good would look like, as this varies significantly between organisations based on local risks and local factors that contribute to their overall counter fraud position, and as such, what constitutes good in one organisation may not be good in another. Where practical, we share findings that contribute to good performance and may be replicable elsewhere in sector reports and articles on Ngage or in the monthly bulletin, and we recommend review of this content to identify opportunities for the organisation to develop its counter fraud position further.

Huw advised his responsibilities include the internal data analytics team and he would be interested to explore opportunities to develop this further for counter fraud, particularly regarding workers across neighbouring organisations, a common theme of investigations. NHSCFA's findings from Project Athena and Project Wise may be a good starting point to explore possibilities and support this development.

Recommendations

We make the following recommendations based upon the discussions that took place on 22nd January 2026.

- The LCFS should use the guidance shared in the FRA workshop April 2026 as an opportunity to direct the development of FRAs in the organisation to align with Government Counter Fraud Profession's FRA methodology and guidance. Any questions or requests for support with FRAs can be directed to strategicfraudrisk@nhscfa.gov.uk.
- The organisation should utilise LPE guidance that was published by NHSCFA - [Guidance for planning, designing, and conducting Local Proactive Exercises](#).
- The organisation should give further consideration to introducing the ESR fraud awareness e-learning module as recurrent mandatory training, as an effective means to maintain a baseline of fraud awareness across the organisation.

The recommendations made in this report are some of the opportunities that presented themselves in our initial conversation on the day of NHSCFA's visit. This list is not exhaustive, and over the course of the partnership work of the next 12 months, more opportunities to refine and improve counter fraud measures may present themselves to which we will adapt.

Links to the NHSCFA external reporting suite

ACC / DoF Link - <https://sway.cloud.microsoft/mPrJBPIWesJOidNk?ref=Link>

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LCFS / CFC Link - <https://sway.cloud.microsoft/LBSHk6PLQWGUg7Xs?ref=Link>

The NHSCFA can be contacted directly for support in implementing the action plan resulting from this report through fraudhub@nhscfa.gov.uk.