



PWYLLGOR ARCHWILIO A SICRWYDD RISG AUDIT AND RISK ASSURANCE COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	12 December 2023
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 & 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 & 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 12 December 2023

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 30/11/2023	Resource Used (Percentage as at 30/11/2023)
STRATEGIC GOVERNANCE	40	28	70%
INFORM AND INVOLVE	85	60	70%
PREVENT AND DETER	120	78	65%
HOLD TO ACCOUNT	175	120	68%
TOTAL	420	286	68%

Work Area	Summary of work areas completed
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. A new, All Wales Counter Fraud E-learning package has been created and is in operation. • Counter Fraud content on the Health Board's Medicines Safety learning days has again been delivered to Nurses by way of three virtual sessions since the last report. • Counter Fraud presentations continue to be delivered to the Overseas Nurses Cohort, raising awareness of Fraud, Bribery and Corruption, in addition to recent frauds involving immigration and rental properties. Due to a suspension in the intake of overseas nurses for this financial year, the Counter Fraud department provides its final 2023/24 presentation in October 2023. • International Fraud Awareness week took place the week commencing Monday 13 November 2023, during which several activities took place, including face to face awareness sessions at Worthybush General Hospital and Prince Philip Hospital. In addition, seven online webinars took place, where presentations were delivered to general staff groups, HDdUHB Recruitment staff, NWSSP Procurement staff and the Nurse Bank department. <p>As well as the above, daily digital newsletters were published via the Global Messaging System, placing NHS Fraud under the magnifying glass. Topics included, Working Whilst Sick, Expenses, Charitable Funds, and Overpayments of Salary. These documents will be circulated to committee members via the MS Teams chat bar.</p>
Prevent and Deter	<ul style="list-style-type: none"> • Following receipt of a Fraud Prevention Notice linked to the Impersonating Medical Professionals, three pro-active exercises have been commenced, these include: <ul style="list-style-type: none"> ➤ Two workers, one shift - This exercise will look to review our internal systems, specifically scenarios where two persons are said to have worked the same shift. In these circumstances, there is a risk that a person with genuine credentials person will have booked and be allocated a shift, but a different worker

arrives on the day. The risk is that this person is unknown to the Health Board and is impersonating another. Upon review, there were instances where two persons were said to be working the same shift, however, upon closer examination of the backing data, we identified that the shifts concerned were split into two, where one person worked the AM and another the PM. In all instances, no duplicates were found and each of the shifts had been verified as being worked by two known workers. The exercise has demonstrated that Wards / Nurse Bank are allocating one person per booking reference and where the shifts are split, a rationale for doing so is being recorded on the rostering system.

- One person working for two Health Boards – A cross border exercise has commenced in partnership with Swansea Bay UHB and Cwm Taf UHB which will look for the same registered Nurse having booked shifts for multiple organisations on the same time / date. Again, the risk is that a genuine registered Nurse will book multiple shifts but send unknown persons to work the shift on their behalf. It is said that this person will have fake identification on their person and appropriate uniform to facilitate the offence of impersonating a medical professional. Relevant data has been collated and duplicates identified, however, further work is required to verify the workers by Personal Identifiable data and not just their first and surname. Counter Fraud are working in partnership with Nurse Bank to undertake this enquiry.
- Identification Checks – the third 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. To date, two sites have been visited, namely Prince Philip Hospital and Withybush General Hospital. Further checks will need to be undertaken before conclusion of the exercise. 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.

- A further Local Proactive Exercise has been commenced in connection with invoices submitted by off framework Nursing Agencies, in particular looking at invoices submitted without valid shift booking reference numbers. Relevant data, such as invoices and timesheets associated with a sample of invoice data has been requested from Nurse Bank. Upon receipt, verification will be sought as to whether the shift was worked and by whom.
- In line with the new Counter Fraud process for identifying and reporting on Fraud Risks, fourteen fraud themes have been identified. Each theme has been sent to the relevant directorate lead for assessment, identification and reporting of controls, Risk Scoring and where applicable, Datix reporting. The In-Committee report will document the description of the risk, who has been contacted and the reply received. The service will then be asked to comment on whether the score will be tolerated, treated, transferred, or terminated and where applicable recorded on Datix. Where controls have been identified, Counter Fraud will work with the directorate to evaluate the controls by way of undertaking a local pro-active exercise. The report will be shared with the committee via the in-committee session. This is necessary to mitigate the risk of those intent on committing fraud against the NHS from identifying existing or emerging control measures. A summary of the risk themes include:
 - Procurement related fraud - Rigging of tenders
 - Procurement related fraud - Petty cash
 - Procurement related fraud - Credit card monitoring
 - Procurement related fraud - Contract splitting
 - Procurement related fraud - Buying of goods and services
 - Procurement related fraud - Supplier fraud

	<ul style="list-style-type: none"> ➤ Recruitment fraud - False qualifications ➤ Recruitment fraud - Criminal convictions ➤ Recruitment fraud - Right to work in the UK ➤ Employee fraud - Bank holiday leave ➤ Employee fraud - Timesheet fraud associated with toil management ➤ Employee fraud - Working elsewhere ➤ Employee fraud - Impersonating a medical professional ➤ Employee fraud – Abuse of position in connection with family members
Hold to Account	<ul style="list-style-type: none"> • A number of new referrals have been received into the department over the last two months, with significant work being undertaken around these. These are noted within a separate report, for discussion during the closed In-Committee session.
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. • The LCFS attended a quarterly Post Payment Verification (PPV) meeting, during which issues relating to current contractual monitoring requirements associated with Community Pharmacy. These meetings will continue throughout the year. • The Lead LCFS and Fraud Champion continue to meet on a bi-monthly basis, offering both parties the opportunity to raise and discuss areas of concern.

Report Provided by:
Ben Rees - Lead Local Counter Fraud Specialist
For presentation; 12 December 2023

Report agreed by:
Huw Thomas
Director of Finance