

Countering Fraud & Corruption Policy, Strategy and Guidance Notes

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**Countering Fraud and Corruption Policy
Strategy and Guidance Notes
Version Control Sheet**

Version	Section/Para/ Appendix	Version/Descripti on of Amendments	Date	Author/Amended by
1		New Policy (adopted from NHSL F004)	July 2014	Sean McKeever
2		Annual review and minor amendments	October 2015	Interim Director of Finance / Deputy Director of Finance and Local Counter Fraud Specialist
2.1		Extension Agreed	February 2018	Corporate Assurance Team
3	Throughout	Updated to reflect NHS Protect now NHS Counter Fraud Authority and annual review with amends	July 2018	Head of Financial Accounts Local Counter Fraud Specialist

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Lincolnshire Community Health Services NHS Trust
Countering Fraud and Corruption Policy, Strategy and Guidance
Notes

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Lincolnshire Community Health Services NHS Trust

Countering Fraud and Corruption Policy, Strategy and Guidance Notes

Policy Statement

Background	The purpose of this document is to explain the policy of the organisation in countering fraud and corruption and provide guidance on how this is to be achieved.
Statement	Lincolnshire Community Health Services NHS Trust is committed to countering fraud and corruption through the implementation of this policy.
Responsibilities	Compliance with the policy will be the responsibility of all Lincolnshire Community Health Services NHS Trust staff. Where appropriate, contractors and other parties will be expected to comply with the policy.
Training	Lincolnshire Community Health Services NHS Trust will continue to provide training to staff with regard to their role in countering fraud and corruption.
Dissemination	Intranet
Resource implication	Lincolnshire Community Health Services NHS will continue to devote the necessary resources to delivery of this policy and strategy.

Countering Fraud and Corruption Policy, Strategy and Guidance Notes

INTRODUCTION

This document supports the prevention and deterrence of fraud and corruption across Lincolnshire Community Health Service NHS Trust. It contains the organisation's:

- Counter Fraud and Corruption Policy (this page)
- Strategy for countering fraud and corruption (pages 2 to 8)
- Additional guidance for use by staff, contractors and the public (pages 9 to 17)

A counter fraud workplan, in support of the strategy, is approved annually by the audit Committee.

COUNTER FRAUD AND CORRUPTION

POLICY The policy of Lincolnshire

Community Health Service NHS Trust is:

- to minimise opportunities for, and risk of, fraud;
- to investigate reported suspicions; and
- to seek or pursue sanctions, including recovery, where fraud has taken place.

One of the basic principles of public sector organisations is the proper use of public funds. Lincolnshire Community Health Service NHS Trust is responsible for appropriate use of public funds and assets to support improved NHS services to patients and other users. We are accountable to the public for the provision of services in an open and honest manner and any failure to do so brings the service into disrepute and threatens the respect afforded to the whole organisation. It is, therefore, important that all those who work in Lincolnshire Community Health Service NHS Trust are aware of the risk of, and means of enforcing the rules against, fraud and other illegal acts involving dishonesty or damage to property. It is in the interests of all staff to uphold these principles.

Any apparent fraud or financial irregularity will be investigated and disciplinary action, including reference to any relevant professional organisation, will be taken. Cases will be referred for formal investigation wherever there is prima facie evidence of a criminal offence.

Criminal and civil prosecutions and recovery of money from individuals convicted of fraudulent activity will be pursued.

Staff have a duty to protect NHS assets and also to co-operate with any investigation and the Board wishes to encourage anyone having suspicions of fraud to report them. All members of staff can, therefore, be confident that their reasonably held suspicions will be taken seriously.

ORGANISATION COUNTER FRAUD AND CORRUPTION STRATEGY

Strategy Elements

1. Culture and awareness

To promote and publicise a culture of honesty and to ensure that staff and contractors are aware of their responsibility for the appropriate use of public funds. To raise awareness of frauds and corruption that may occur within the NHS.

2. Deterrence and prevention

To maintain and give fraud proofing advice on the systems and processes that prevent and deter potential fraudulent or corrupt activities.

3. Investigation

To investigate suspected frauds promptly and objectively.

4. Sanction and redress

To pursue appropriate disciplinary, criminal and/or civil action and inform relevant professional bodies when evidence suggests fraudulent or corrupt activity has taken place.

5. Education

To train and develop staff with regard to their role and responsibilities for the appropriate use of public funds.

6. Partnership

To work with other agencies and organisations to ensure appropriate use of public funds and assets.

Countering Fraud and Corruption Strategy

Strategy Element: 1. Culture and Awareness

Statement

To promote and publicise a culture of honesty and to ensure that staff and contractors are aware of their responsibility for the appropriate use of public funds. It is the responsibility of all staff to report suspicions of fraudulent activities, this document raises awareness of frauds and corruption that may occur within the NHS and awareness of whom any suspicious activities should be reported.

Description and Long-Term Goals

One of the basic principles of public sector organisations is the proper use of public funds. We are accountable to the public for the provision of services in an open and honest manner and any failure to do so brings Lincolnshire Community Health Service NHS Trust into disrepute and threatens the respect afforded to the whole organisation. It is, therefore, important that all those who work in Lincolnshire Community Health Service NHS Trust are aware of the risk of, and means of enforcing the rules against, fraud and other illegal acts. It is in the interests of all Lincolnshire Community Health Service NHS Trust staff to uphold these principles.

Any apparent fraud or financial irregularity will be investigated by the Local Counter Fraud

Specialist (LCFS). If appropriate, disciplinary action, including reference to any relevant professional organisation, will be undertaken by Human Resources.

Criminal and civil prosecutions and recovery of money from individuals convicted of fraudulent activity will also be pursued as appropriate.

All staff have a duty to protect the assets of the Lincolnshire Community Health Service NHS Trust and also to co-operate with any investigation. The Board also wishes to encourage anyone having suspicions of fraud to report them. All members of staff can, therefore, be confident that their reasonably held suspicions will be taken seriously.

Countering Fraud and Corruption Policy and Strategy

Strategy Element: 2. Deterrence and Prevention

Statement

To maintain systems and processes that prevents and deters potential fraudulent or corrupt activities.

Description and Long-Term Goals

The most effective deterrent will come from those of us within Lincolnshire Community Health Service NHS Trust who value the services provided and disapprove of those who abuse the systems through fraud and corruption.

In addition, publicity surrounding counter fraud work will deter some who perpetrate or consider perpetrating fraud.

Lincolnshire Community Health Service NHS Trust staff are key to preventing fraud. The implementation of robust systems is essential.

Where a case of fraud is established, the LCFS will provide a report on system weaknesses and/or risks to Lincolnshire Community Health Service NHS Trust and other bodies. Where there is no evidence of fraud but where system weaknesses are identified, these are also reported to Lincolnshire Community Health Service NHS Trust.

Countering Fraud and Corruption Policy and Strategy

Strategy Element: 3. Investigation

Statement

To investigate suspected frauds promptly and

objectively. **Description and Long-Term Goals**

The Director of Finance takes responsibility for all fraud and corruption matters and monitors and ensures compliance with the Secretary of State Directions on Counter Fraud and Corruption.

Suspected fraud will be investigated by accredited NHS Counter Fraud Specialists in a professional, confidential, objective and timely manner.

As soon as there is a suspicion of fraud or corruption, a referral should be made to NHS Lincolnshire's Local Counter Fraud Specialist (LCFS) and the NHS Counter Fraud Authority.

The LCFS will then substantiate the referral and seek to obtain at least one reliable piece of information.

The LCFS will investigate cases in line with Secretary of State Directions and the NHS Counter Fraud & Corruption Manual.

The LCFS will provide reports on systems and policy weaknesses arising from investigations to the Director of Finance and Contracting.

The LCFS will advise the Internal Audit Manager of system and policy weaknesses arising from investigations.

All matters reported by staff or any other person using the services of the organisation will be treated seriously and will be thoroughly investigated.

Fraud or corruption concerns should be raised with Lincolnshire Community Health Service NHS Trust's LCFS – on 07843 325993 or via e-mail at neil.mohan@nhs.net Alternatively, concerns can be raised with the Director of Finance and Business Intelligence on 01522 308920. Contact can also be made (anonymously if preferred) to the national NHS Fraud & Corruption Reporting Line on 0800 028 4060 or to the East Midlands Regional Team on 01623 788901.

Countering Fraud and Corruption Policy and Strategy

Strategy Element: 4. Sanction and Redress

Statement

To pursue appropriate disciplinary, criminal and/or civil action and inform relevant professional bodies when evidence suggests fraudulent or corrupt activity has taken place.

Description and Long-Term Goals

Following the investigation of fraud, it is important to ensure that appropriate sanctions, whether disciplinary, professional, criminal or civil are applied to those who have committed fraud.

In accordance with the Department of Health guidance in "Countering Fraud in the NHS : applying appropriate sanctions consistently (December 2007 update)", Lincolnshire Community Health Service NHS Trust will undertake parallel sanctions and, where appropriate, simultaneously pursue one or more of the sanctions (disciplinary, professional, criminal or civil) in compliance with the Secretary of State Directions and the NHS Anti-Fraud Manual.

When evidence suggests fraudulent or corrupt activity has taken place, the Local Counter Fraud Specialist (LCFS) and Finance and Human Resources Departments will seek compensation through all appropriate routes. It is important that resources fraudulently obtained are recovered, wherever possible. Fraudsters should not benefit from their crimes – monies recovered should be put back into patient care.

Countering Fraud and Corruption Policy and Strategy

Strategy Element: 5. Education

Statement

To train and develop staff with regard to their role and responsibilities for the appropriate use of public funds.

Description and Long-Term Goals

Lincolnshire Community Health Service NHS Trust will support its ambitions to eliminate fraud and corruption at the Trust with appropriate education and training for staff through awareness and fraud prevention advice.

Countering Fraud and Corruption Policy and Strategy

Strategy Element: 6. Partnership

Statement

To work with other agencies and organisations to ensure appropriate use of public funds and assets.

Description and Long-Term Goals

Lincolnshire Community Health Service NHS Trust has a statutory duty to comply with those elements of the Health and Social Care Act 2012 that relate to Fraud and Corruption.

Lincolnshire Community Health Service NHS Trust will aim to ensure that the agencies and organisations it works with are made aware of the Trusts' responsibilities for countering fraud and corruption with the expectation that they will work with Lincolnshire Community Health Service NHS Trust to support these requirements, ensuring the appropriate use of public funds and assets.

Lincolnshire Community Health Service NHS Trust staff will use opportunities in their dealings with external agencies and organisations and when entering into contracts, to advise these bodies of the Trusts' stance of zero tolerance against fraud and corruption.

Lincolnshire Community Health Service NHS Trust staff will ensure contracts with external agencies will be fraud proofed.

Countering Fraud and Corruption

Guidance Notes

Foreword

One of the basic principles of public sector organisations is the proper use of public funds. It is, therefore, important that all those who work within the NHS are aware of the risk of fraud and corruption, and the means of enforcing the rules against fraud and corruption. It is in the interests of us all to uphold these principles.

Fraud in the NHS costs the taxpayer millions of pounds every year. By raising fraud awareness and successfully combating fraud and corruption, we will help to minimise losses and free up resources for patient care and services.

As a public body, we are also accountable to the public for the provision of services in an open and honest manner and any failure to do so brings Lincolnshire Community Health Service NHS Trust into disrepute and threatens the respect afforded to the whole organisation.

Lincolnshire Community Health Service NHS Trust has procedures in place that reduce the likelihood of fraud occurring. These include Standing Orders, Standing Financial Instructions, documented procedures, a system of internal control and a system of risk management. In addition, Lincolnshire Community Health Service NHS Trust tries to ensure that a risk and a fraud awareness culture exists within our organisation.

The Public Interest Disclosure Act 1998 gives statutory protection, within defined parameters, to staff that make disclosures about a range of subjects, including fraud and corruption, which they believe to be happening within the organisation employing them.

This document has been prepared so that you know how you can help to combat fraud and corruption and whom you can contact within the organisation for advice and guidance.

This document is for use by all Lincolnshire Community Health Service NHS Trust staff, its contractors and members of the public.

This document provides guidance on the application of the organisation's Policy and Strategy on Countering Fraud and Corruption.

1 INTRODUCTION

1.1 The NHS Executive published the strategy document 'Countering Fraud in the NHS' in

1998. The NHS Counter Fraud & Security Management Service (NHS CFSMS) was subsequently established, giving rise to a co-ordinated approach within the NHS for dealing with fraud and corruption. The Secretary of State issued Directions to all health bodies in December 1998 in respect of the new arrangements that have been put in place to Counter Fraud and Corruption in the NHS. The NHS CFSMS has been separated into the NHS Counter Fraud Service and the NHS Security Management Service, both now running under the NHS Business Services Authority. Since its establishment, the CFSMS, (now known as 'NHS Counter Fraud Authority'), has concentrated on creating a counter fraud structure with a view to -

- reducing fraud to an absolute minimum within 10 years
- putting in place arrangements to hold fraud at an absolute minimum level
- free up resources for better patient care

1.2 The NHS Counter Fraud Authority has recruited dedicated specialists to counter fraud within the NHS. There are specialist teams supported by a national proactive team with specialist teams working to investigate dental and pharmaceutical fraud.

1.3 In addition, there is a Local Counter Fraud Specialist (LCFS) nominated to each health

body. LCFSs have a vital role to play within the counter fraud structure. They act as the "first line of defence" against fraud and corruption within the health body, working closely with NHS Counter Fraud Authority, the Chief Executive and Director of Finance of Lincolnshire Community Health Service NHS Trust. LCFS's are required to receive training and are accredited as a Counter Fraud Specialist through the Institute of Criminal Justice Studies. LCFS's are trained to conduct their work in a professional, confidential and ethical manner.

2. SCOPE

2.1 This document has been produced in order to establish and explain Lincolnshire Community Health Service NHS Trust's framework to minimise fraud and corruption.

3. OBJECTIVES

3.1 To implement the aims of the organisation's policy and strategy on countering fraud,

seven key areas of action have been identified:

3.2 Creation of an Anti Fraud Culture

3.2.1 All staff, managers or policy makers within Lincolnshire Community Health Service NHS Trust have a part to play in the fight against fraud. The organisation's Local Counter Fraud Specialist (LCFS) will play an active part in raising fraud awareness and enforcing the message that fraud within the organisation is not acceptable and will not be tolerated.

3.3 Maximum Deterrence of Fraud

3.3.1 The most effective deterrent will come from those of us within the organisation who value the services provided and disapprove of those who abuse the systems through fraud and corruption. In addition, publicity surrounding counter fraud work will deter some who perpetrate or consider perpetrating fraud.

3.4 Successful Prevention of Fraud

- 3.4.1 The organisation's staff are key to preventing fraud. Their co-operation with the implementation and operation of robust systems are essential, so that if fraud is attempted, it will fail.
- 3.4.2 Where a case of fraud is established, the LCFS will provide a report on systems weaknesses and/or risks to the organisation, NHS Counter Fraud Authority, Internal Audit and External Audit.

3.5 Prompt Detection of Fraud Which Cannot be Prevented

- 3.5.1 The organisation will use its own information but also information from NHS Counter Fraud Authority, Internal Audit and External Audit in order to assist the discovery of fraud which has not been prevented or previously detected. Early detection of fraud helps effective investigation and can establish links between different types of fraud.

3.6 Professional Investigation of Detected Fraud

- 3.6.1 Detected fraud will be investigated by accredited NHS Counter Fraud Specialists in a professional, confidential, objective and timely manner.
- 3.6.2 Referrals to the LCFS should be made as soon as there is a suspicion of fraud or corruption which is substantiated by at least one reliable piece of information.
- 3.6.3 Fraud or Corruption concerns should be raised with the organisation's LCFS Tel: 07843 325993 or via e-mail at neil.mohan@nhs.net . Alternatively, concerns can be raised with the Lincolnshire Community Health Service NHS Trust Director of Finance. Contact can also be made (anonymously if preferred) to the national NHS Fraud & Corruption Reporting Line on 0800 028 40 60.
- 3.6.4 All matters reported by staff or any other person using the services of the Lincolnshire Community Health Service NHS Trust, will be treated seriously and will be thoroughly investigated. Where the source of the referral is known, the referral will be acknowledged by the LCFS. The LCFS will ensure investigations focus on obtaining information so that recovery of funds can take place.
- 3.6.5 All staff (including Non-Executive Directors) must co-operate fully with the LCFS and provide any evidence that they require during the course of the enquiries.

3.7 Effective Sanctions, Including Appropriate Legal Action Against People Committing Fraud

- 3.7.1 Following the investigation of fraud, it is important to ensure that appropriate sanctions, whether disciplinary, criminal or civil are applied to those who have committed fraud. Department of Health guidance is contained in "Countering Fraud in the NHS: applying appropriate sanctions consistently (December 2007 update)".

3.8 Effective Methods of Seeking Redress in Respect of Money Defrauded

- 3.8.1 It is important that resources fraudulently obtained are recovered, wherever possible. Fraudsters should not benefit from their crimes; monies recovered should be put back into patient care and the Trust will make every effort to recover monies lost through fraud or corruption, whenever practicable.

3.8.2 The Trust's Overpayment Policy (available on the Trust intranet) details the range of methods that will be utilised to recover any losses to fraud or corruption. The Trust will always seek to recover such losses whenever practicable, using the full range of Civil and Criminal methods at its disposal.

4. DEFINITIONS

Fraud – English law now defines fraud under the Fraud Act 2006. For the purpose of these guidance notes “to defraud is to deprive by deceit”. This would include the obtaining of any property including money, any services or the obtaining of any pecuniary advantage and will include such actions as working whilst off sick without permission or the abuse of authorised signatories.

Corruption - The Bribery Act 2010 has replaced the fragmented and complex offences at common law, and in the Prevention of Corruption Acts 1889-1916. This broadly defines the two sections below;

- Two general offences of bribery – 1) Offering or giving a bribe to induce someone to behave, or to reward someone for behaving, improperly and 2) requesting or accepting a bribe either in exchange for acting improperly, or where the request or acceptance is itself improper;
- The new corporate offence of negligently failing by a company or limited liability partnership to prevent bribery being given or offered by an employee or agent on behalf of that organisation.

5. EMPLOYEES' RESPONSIBILITIES

- All staff have a duty to protect the assets of Lincolnshire Community Health Service NHS Trust and the Board wishes to encourage anyone having suspicions of fraud and corruption to report them. All members of staff can, therefore, be confident that their reasonably held suspicions will be taken seriously and no member of staff will suffer in any way as a result of reporting them.
- Lincolnshire Community Health Service NHS Trust discourages anybody who has reasonably held suspicions from doing nothing, trying to investigate the matter themselves, talking to others about their suspicions or approaching or accusing any individual themselves. Any of these actions could result in the continual perpetration of any fraud offences being committed against the organisation, or compromise or jeopardise a successful outcome of a counter fraud investigation.
- Front line staff are often in the best position to identify areas for concern and must therefore take the responsibility to ensure that any real concerns are passed on to the Local Counter Fraud Specialist, and provide a statement if required.

6. MANAGERS' RESPONSIBILITIES

- If a manager is notified of, or suspects that an offence may have been committed, they must report the matter immediately to the Local Counter Fraud Specialist.
- They must make notes of anything they hear or see relating to the suspicion including dates, times, descriptions etc.
- They must **not** conduct any type of investigation. It is important to note that a case can be jeopardised if evidence is not collected in the proper manner. Evidence also includes witness statements. In view of the complexity and importance of complying with all the conditions of Code C of the Police and Criminal Evidence Act 1984 (PACE), Line Managers or other staff **must not** carry out any investigations or interviews.
- They must co-operate fully with the LCFS and provide any evidence that they require during the course of the enquiries, together with providing a statement if required.

7. DIRECTOR RESPONSIBILITIES

7.1 All Executive and Non-Executive Directors are required to co-operate fully with the LCFS and provide any evidence that is required during the course of any enquiries, together with providing a statement if required.

7.2 The Director of Finance is required to:

- Take responsibility for all fraud matters in conjunction with the Chief Executive, monitor and ensure compliance with the Secretary of State Directions on the prevention of Fraud and Corruption.
- Direct the work of the LCFS in accordance with the NHS Counter Fraud and Corruption Manual.
- Liaise and reach agreement with OFT where the appropriate sanction is felt to be prosecution before any future action is taken by either the Lincolnshire Community Health Service NHS Trust or OFT.
- Ensure appropriate sanctions whether disciplinary, criminal or civil (or a combination) are applied to those who have committed fraud.
- Ensure, in conjunction with the Chief Executive, that the LCFS or other investigation team has access to all premises, records or data owned or controlled by the Lincolnshire Community Health Service NHS Trust, together with access to all staff who may have information to provide, in the detection and investigation of cases of Fraud and Corruption.
- Ensure there is proper liaison with Human Resources on matters of Employment Law or where disciplinary action is felt appropriate.
- Ensure the outcome of each investigation is reported to the Audit Committee of Lincolnshire Community Health Service NHS Trust, NHS Counter Fraud Authority, Internal Audit and the External Auditor.
- Liaise with the Chief Executive, Communications Officer, LCFS and NHS Counter Fraud Authority on any issues involving publicity concerning investigations.
- Ensure Lincolnshire Community Health Service NHS Trust facilitates and co-operates with NHS Counter Fraud Authority to deliver the quality inspection work and provides prompt access to staff, work places and relevant documentation.

7.3 The Director with responsibility for Human Resources is required to:

- Support and advise Line Managers and the LCFS throughout the course of an investigation.
- Advise Line Managers and the LCFS on the appropriateness of suspension of the employee where disciplinary action is proposed.
- Liaise with the Director of Finance and provide support in relation to any Employment Law issues or any employee related consequences.
- Liaise with the Director of Finance, LCFS and NHS Counter Fraud Authority to ensure that disciplinary action is taken at the right time and without prejudice to any criminal action.

8. The LCFS is required to:

- On an annual basis, prepare an operational work plan which will prioritise action against the key objectives.
- Advise staff and managers on fraud issues.
- Document any notification of an alleged fraud.
- Refer to the Director of Finance any cases of alleged fraud and inform NHS of all cases of suspected fraud or corruption investigated.
- Carry out re-active investigations directed by the Director of Finance.
- Maintain records of all investigations as required by the NHS Counter Fraud & Corruption Manual.
- Liaise with the Human Resources Department concerning any employment issues arising from an investigation.
- Carry out all work in accordance with the NHS Anti-Fraud Manual and ensure all proper notifications are made to NHS Counter Fraud Authority.
- To provide assistance to any NHS Counter Fraud Authority Investigation Team involving investigations within Lincolnshire Community Health Service NHS Trust.
- Ensure a full report is produced following each investigation as required by Secretary of State Directions.
- Liaise closely with External and Internal Audit to identify any potential areas where fraud could occur.
- Ensure External and Internal Audit are made aware of any investigations which have led to the identification of internal control weaknesses.
- The LCFS will report direct to the Director of Finance and provide an annual written report to Lincolnshire Community Health Service NHS Trust.
- The LCFS will have right of attendance to all Audit Committee meetings and have right of access to all Audit Committee members, the Chairman and Chief Executive of Lincolnshire Community Health Service NHS Trust.

9. CONCLUSION

- The ultimate aim of counter fraud work within the organisation is to support improved NHS services to patients and other users.
- Lincolnshire Community Health Service NHS Trust has a clear network of systems and procedures to assist the fight against fraud and corruption.
- The Director of Finance will monitor and ensure compliance with Statutes and instructions issued by the Secretary of State and/or NHS Counter Fraud Authority relating to countering fraud and corruption.
- Lincolnshire Community Health Service NHS Trust is determined that these arrangements will ensure:

Professionals and managers within the organisation see responsibility for counter fraud awareness and initiatives as an integral part of their role and duties.

Staff demonstrate that fraud within the organisation is clearly unacceptable and there is widespread support for counter fraud work.

Secure systems are in place and where new types of fraud occur, they are identified quickly and knowledge of how they are perpetrated is fed back into the process to prevent any recurrence.

10. FURTHER READING

These Guidance Notes should be read in conjunction with the following:

- Fraud & Corruption Policy & Strategy
- Standing Financial Instructions
- Standing Orders & Scheme of Delegation
- Whistle-blowing Policy
- Disclosure under the Public Interest Disclosure Act 1998 which has rules for making a protected disclosure -

Staff must disclose the information in good faith

Staff must believe it to be substantially true

Staff must not act maliciously or make false

allegations Staff must not seek any personal gain

- Code of Conduct for NHS Boards
- NHS Code of Conduct for Managers.

11. POLICY REVIEW

This document should be reviewed on an annual basis by the Audit Committee with the Director of Finance authorised to make minor amendments more frequently if necessary.

Monitoring Template

Minimum requirement to be monitored	Process for monitoring e.g. audit	Responsible individuals/ group/ committee	Frequency of monitoring/audit	Responsible individuals/ group/ committee (multidisciplinary) for review of results	Responsible individuals/ group/ committee for development of action plan	Responsible individuals/ group/ committee for monitoring of action plan
Review of Counter Fraud reports	Reports Submitted to Audit Committee.	Audit Committee	4 times per annum	Audit Committee	Counter Fraud Service	Audit Committee

Name of Policy/Procedure/Function*

**Equality Analysis Carried out by: Deputy Director of
Finance**

Date: 29th October 2015

Equality & Human rights Lead: Rachel Higgins

Director\General Manager: Roy Jackson

***In this template the term policy\service is used as shorthand for what needs to be analysed. Policy\Service needs to be understood broadly to embrace the full range of policies, practices, activities and decisions: essentially everything we do, whether it is formally written down or whether it is informal custom and practice. This includes existing policies and any new policies under development.**

Section 1 – to be completed for all policies

A.	Briefly give an outline of the key objectives of the policy; what it's intended outcome is and who the intended beneficiaries are expected to be	To ensure fraud risk is minimised and mitigated were possible.		
B.	Does the policy have an impact on patients, carers or staff, or the wider community that we have links with? Please give details	This policy refers to all patients and staff.		
C.	Is there is any evidence that the policy\service relates to an area with known inequalities? Please give details	No		
D.	Will/Does the implementation of the policy\service result in different impacts for protected characteristics?	No		
		Yes	No	
			X	
			X	
			X	
			X	
			X	
			X	
			X	
			X	
			X	
			X	
			X	
			X	
If you have answered 'Yes' to any of the questions then you are required to carry out a full Equality Analysis which should be approved by the Equality and Human Rights Lead – please go to section 2				
The above named policy has been considered and does not require a full equality analysis				
Equality Analysis Carried out by:			Deputy Director of Finance	
Date:			29 th October 2015	