

Scottish Ambulance Service Strategy to Combat NHS Fraud

Introduction

The Scottish Government issued an updated strategy to combat NHS Fraud on 28th January 2008. This document sets out how the strategy will be adopted within the Scottish Ambulance Service.

Background

The Scottish Ambulance Service has uncovered an average of 3 cases of fraud per year, either committed by staff or voluntary drivers. The financial cost of the fraudulent activity is estimated as c. £10k per annum. The Service has policies and procedures in place to minimise the risks of fraud, and to report and investigate potential fraud. These policies and procedures have been developed in partnership and cover the responsibilities of staff, contractors, the Board and its Committees, Internal Audit and NHS Counter Fraud Services.

Strategy

The Service will fully adopt the principles and strategic actions set out in the “Strategy to Combat NHS Fraud in Scotland”. The specific actions it will take during 2008/09 are:

Action	Responsibility	Due Date
Agree roles and responsibilities as set out below	Executive Team Audit Committee Board	February 2008 March 2008 March 2008
Inform SGHD/ CFS of Counter Fraud Champion	Finance Director	March 2008
Publish Strategy on Web site and Intranet	Finance Director	March 2008
Alert Staff to updated strategy in payslip announcement	Finance Director	March 2008
Discuss Strategy at National Partnership Forum	Finance Director	February 2008
Present Strategy to Audit Committee	NHS Counter Fraud Services	March 2008
Review Service Disciplinary Procedures and amend as necessary	HR Director	May 2008
Develop programme of Fraud Awareness sessions for Staff, and e-learning packages	Fraud Liason Officer	April 2008
Implement enhanced reporting arrangements when published	Finance Director	April 2008
Input into development of DVD for managers	HR Director	2008
Update Induction arrangements to incorporate fraud awareness	HR Director	2008
Update training arrangements for existing staff	HR Director	2008

Roles and Responsibilities

The **Audit Committee** will ensure that all appropriate counter fraud measures are in place and that it has sight of all reports produced by NHSS Counter Fraud Services.

The **Finance Director** will act as Counter Fraud Champion, fulfilling the role set out in CEL 3 (2008) – appended.

The **Financial Services Manager** will act as Fraud Liaison Officer, fulfilling the role as set out in CEL 3 (2008) – appended.

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Dear Colleague

STRATEGY TO COMBAT NHS FRAUD IN SCOTLAND

Summary

1. This letter informs NHSScotland bodies of the issuing by the Scottish Government of an updated strategy to combat NHS fraud and asks them to take specific actions in relation to this.

Background

2. The Scottish Government has issued an updated strategy to counter NHS fraud in Scotland. The new strategy builds on the previous version, developing it further. There are new elements to tackle the minority of people who defraud the NHS, including the identification of counter fraud champions within NHS bodies to further heighten fraud awareness and underscore the counter fraud message. The potential interaction between these champions and both audit committees and fraud liaison officers is outlined in the attached Annex which will also be included in an update of the Partnership Agreement between NHSScotland Counter Fraud Services (the CFS) and NHS Boards.

3. The strategy outlines initiatives being undertaken currently by the CFS. Some of these are in partnership with NHS HR managers to develop fraud awareness material, including an e-learning package for use in induction and continuing training of staff and a DVD to assist managers in understanding how they should act when presented with potentially fraudulent activity. The e-learning package is being piloted in early 2008 and will be rolled out to all NHS Scotland bodies thereafter. The DVD is at the design stage and will be issued to Boards during 2008.

The CFS are also in the process of initiating pilot projects within NHS Bodies whereby a local CFS presence will be established.

4. Copies of the strategy will be issued to Chief Executives, Chief Internal Auditor website at:

<http://www.scotland.gov.uk/Publications/2008/01/10154828/0>.

CEL 3 (2008)

28 January 2008

Addresses

For action

Chief Executives and HR Directors,
NHS Boards and special Health
Boards

Chief Executive and HR Director,
NHS National Services Scotland

Head of Service, NHSScotland
Counter Fraud Services

For information

Chairs, Audit Committees, NHS
Boards and special Health Boards
Directors of Finance, NHS Boards
and special Health Boards
Fraud Liaison Officers, NHS Boards
and special Health Boards
Chief Internal Auditors, NHS Boards
and special Health Boards
Employee Directors, NHS Boards and
special Health Boards

Auditor General

Association of Chief Police Officers
(Scotland)

Enquiries to:

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Scottish Government
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Fax: 0131-244 2326

<http://www.scotland.gov.uk>

5. From 1 April 2008, SGHD will introduce enhanced reporting of frauds and potential frauds against the NHS

Action

6. Chief Executives of NHS Boards and special Health Boards are asked to:

read the strategy, disseminate its contents to all staff within their Boards and take action as appropriate in accordance with it;

ensure that their Audit Committees are aware of the strategy;

encourage staff to attend fraud awareness sessions organised in association with the CFS and to use the e-learning package;

identify an NHS counter fraud champion within their Board at either senior manager or non-executive director level and provide SGHD and the CFS with details of these; and

note that further information on enhanced reporting, from 1 April 2008, of frauds and potential frauds against the NHS will be issued in due course.

7. HR Directors of NHS Boards and special Health Boards are asked to:

work with the CFS on the production of the DVD outlined in paragraph 3 above;

work with the CFS on fraud awareness material for inclusion in the induction training of new staff and the continuing training of existing staff; and

ensure that fraud awareness material is included in induction packages for new staff members.

8. The CFS are asked to nominate, as part of the process of enhancing the counter fraud message at local level

9. The names and other details of the counter fraud champions identified by Boards should be forwarded to S Way, Livingston EH54 6GA.

Yours sincerely



ALEX SMITH

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ANNEX

ROLE OF AUDIT COMMITTEES IN TACKLING NHS FRAUD

The Audit Committee of each NHSScotland body should ensure that all appropriate counter fraud measures are in place and that they have sight of all reports produced by NHSScotland Counter Fraud Services.

ROLE OF NHS COUNTER FRAUD CHAMPIONS

The list outlined below of the Counter Fraud Champion's roles and responsibilities is not exhaustive but is indicative of the activities which he/she should undertake in order to spearhead changes in culture and attitudes towards NHS fraud within his/her NHS Body.

The NHS Counter Fraud Champion should be a senior executive of the NHS Body, reporting to the accountable officer. A Non Executive Director such as the Chair of the Board's Audit Committee could also take on this role. If this is the case, we recognise that it will be necessary to adapt the activities of the champion which are outlined below. As stated above, however, these activities are indicative only. The Champion will:

- raise the profile of counter fraud initiatives and publicity within their body.
- ensure recommendations from investigation reports by NHSScotland Counter Fraud Services (CFS) are implemented within his/her NHS Body.
- make regular reports and/or presentations to the Audit Committee.
- monitor the degree to which recommendations resulting from investigations by the CFS have been implemented within his/her organisation and take steps to ensure full compliance.
- promote the Fraud Liaison Officer (FLO), where the FLO is a different person, as the point of contact for managers and Human Resources (HR) in relation to reporting suspected frauds.
- with the FLO, (where the FLO is a different person) Head of Communications and Human Resources Director ensure awareness of NHSScotland's counter fraud strategy/policy through Board-wide communications and training.
- work with CFS to deliver counter fraud initiatives suitable for application within their Board.

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- set clear guidelines and measures for monitoring the effectiveness of implementation.
- liaise with the Employee Director and Human Resources Director to agree in partnership the most effective mechanisms for raising awareness of the role of CFS and associated issues at a local level, including induction training for new staff and follow-up training for all staff.

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FRAUD LIAISON OFFICER (FLO) – Roles and Responsibilities

In fulfilling the requirements of the CFS/NHS Board Partnership Agreement, the roles and responsibilities of the FLO will include:

- working with the counter fraud champion to promote and develop a counter fraud culture with their Board.
- acting as first point of contact in communications relating to specific cases between CFS and their organisation.
- receiving information about suspected frauds within their organisation from staff or others and passing such information to CFS, including the year end summary of all Board fraud cases regardless of how they were managed.
- notifying CFS of any suspected case of fraud within 2 working days of establishing the facts that give reasonable grounds for suspecting fraud.
- in all cases involving alleged employee fraud, working with the HR lead for the case to ensure that appropriate actions are followed.
- developing distribution network(s) within their organisation for receipt of information and quarterly/ad hoc reports from the CFS,
- ensuring that their Audit Committee (usually through the Counter Fraud Champion) and relevant Appointed Auditor is informed of the status of all current investigations,
- liaising with their organisational media officer, NHS National Services Scotland media officer and the CFS media officer regarding any press enquiry about a fraud case,
- participating in national risk assessment on the likelihood of fraud occurring within different health service disciplines,
- participating in national discussions with other Fraud Liaison Officers and the CFS on the development and revision of operational protocols,
- contributing to the fraud intelligence network through the supply of local knowledge.
- assisting CFS in obtaining locally held records for investigations into suspected frauds.

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- nominating (and notifying the CFS) of a designated deputy.

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