

Local Counter Fraud, Bribery and Corruption Policy

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What is in this policy?	
<p>One of the basic principles of public sector organisations is the proper use of public funds. The majority of people who work in the NHS are honest and professional and they find that fraud committed by a minority is wholly unacceptable as it ultimately leads to a reduction in the resources available for patient care.</p> <p>University Hospitals Bristol NHS Foundation Trust (the Trust) recognises its responsibility to reduce fraud in the NHS. This policy relates to all matters of fraud, bribery and corruption and how it is managed within the Trust.</p> <p>This policy applies to all employees, consultants, vendors, contractors and/or any other parties who have a relationship with the Trust. This policy will be emailed to all staff and will be made available on the Trust Intranet and website to ensure all groups are aware of the policy.</p>	

Document Change Control				
Date of Version	Version Number	Lead for Revisions	Type of Revision	Description of Revision
June 2015	4	Trust Secretary	Major	Updating following new NHS arrangements
Nov 2015	5	Trust Secretary	Major	Policy amended and updated to reflect NHS Protect Standards for Providers. New Contact details. Duty of Candour, Francis Report 2013 Associated Policies
01/12/2018	6	Elias Hayes	Major	First draft using new NHS CFA template.

Sign off Process and Dates	
Groups consulted	Date agreed
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Policy Assurance Group	16/04/2019
Trust Partnership Forum	01/04/2019

- **Stakeholder Group** can include any group that has been consulted over the content or requirement for this policy.
- **Steering Group** can include any meeting of professionals who has been involved in agreeing specific content relating to this policy.
- **Other Groups** include any meetings consulted over this policy.
- **Policy Assurance Group** must agree this document before it is sent to the **Approval Authority** for final sign off before upload to the DMS.

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1. Introduction

One of the basic principles of public sector organisations is the proper use of public funds. The majority of people who work in the NHS are honest and professional and they find that fraud committed by a minority is wholly unacceptable as it ultimately leads to a reduction in the resources available for patient care.

The NHS Counter Fraud Authority (NHSCFA) is charged with identifying, investigating and preventing fraud and other economic crime within the NHS and the wider health group. The NHSCFA is independent from other NHS bodies and directly accountable to the Department of Health and Social Care (DHSC).

The aim is to protect staff and resources from activities that would otherwise undermine their effectiveness and their ability to meet the needs of patients and professionals. Ultimately, this helps to ensure the proper use of valuable NHS resources and a safer, more secure environment in which to deliver and receive care.

The Trust will not tolerate fraud, bribery or corruption. To meet its objectives, it has adopted the operational framework developed by the NHSCFA:

- (a) Strategic Governance – that supports a zero-tolerance approach to wrongdoing; makes this clear to all staff; and monitors, at the very top of the organisation, the effectiveness of the arrangements in place. The Trust will appoint a qualified Local Counter Fraud Specialist (LCFS) to support this commitment.
- (b) Inform and Involve – through setting clear policies and a code of conduct for all staff; raising awareness of the risks; and liaising with other organisations to develop a shared resistance to wrongdoing.
- (c) Prevent and Deter – through focused assessment of risks in existing systems and processes; audit and review of records; proactive checks of new employees and new service suppliers.
- (d) Hold to Account – through audit of known higher risk areas; investigating allegations and indications of wrongdoing; and seeking maximum punishment and reparation if wrongdoing is shown.

2. Purpose

The overall aims of the policy are to:

- (a) Improve the knowledge of all employees at the Trust, irrespective of their position, about fraud, bribery and corruption in the NHS.
- (b) Assist in promoting a climate of openness and an anti-fraud culture, where employees feel able to raise concerns appropriately and responsibly.
- (c) Ensure that appropriate sanctions are considered following an investigation.
- (d) To reduce the occurrence fraud, bribery and corruption at the Trust.

3. Scope

This policy applies to all employees of The Trust, regardless of position held, as well as consultants, vendors, contractors and/or any other parties who have a relationship with the Trust.

4. Definitions

4.1 NHS Counter Fraud Authority (NHSCFA)

- (a) The NHS Counter Fraud Authority (NHSCFA) is responsible for the detection, investigation and prevention of fraud and economic crime within the NHS. Its aim is to lead the fight against fraud affecting the NHS and wider health and social care sector, by using intelligence to understand the nature of fraud risks, investigate serious and complex fraud, reduce its impact and drive forward improvements.
- (b) The Trust will take all necessary steps to counter fraud, bribery and corruption in accordance with this policy and the NHSCFS Counter Fraud and Corruption Manual, (available to the director of finance and information and local counter fraud specialist (LCFS) only), the policy statement 'Applying Appropriate Sanctions Consistently' published by NHSCFA and any other relevant guidance or advice issued by NHSCFA. Available at: <https://cfa.nhs.uk/about-nhscfa/corporate-publications>

4.2 Counter Fraud Standards¹

- (a) SC24 of the NHS Standard Contract states that providers of NHS services must take the necessary action to comply with the NHSCFA's Counter Fraud Standards. Others should have due regard to the standards.
- (b) The NHS Standard Contract also places a requirement on providers to have policies, procedures and processes in place to combat fraud, corruption and bribery to ensure compliance with the standards. This policy document is written in accordance with these standards. The NHSCFA carries out regular assessments of health organisations in line with the Counter Fraud Standards.

4.3 Economic Crime

- (a) Economic Crime can be defined as illegal acts committed by an individual or a group of individuals to obtain a financial or professional advantage. In such crimes, the offender's principal motive is economic gain. This term is the overarching name for crimes such as Fraud, Bribery and Corruption.

4.4 Fraud

- (a) The Fraud Act 2006 represents a fundamental shift in the elements required to prove a fraud offence, and as such, represents a new way of investigating fraud. It is no longer necessary to prove that a person has been deceived. The focus is now on

¹ <https://cfa.nhs.uk/counter-fraud-standards>

the dishonest behaviour of the suspect and their intent to make a gain or cause a loss.

- (b) The offence of fraud can be committed in three ways:
 - (i) Fraud by false representation (Section 2) – lying about something using any means, e.g. by words or actions.
 - (ii) Fraud by failing to disclose information (Section 3) – not saying something when you have a legal duty to do so.
 - (iii) Fraud by abuse of position (Section 4) – abusing a position where there is an expectation to safeguard another person or organisation.

4.5 *Bribery and Corruption*

- (a) The Bribery Act received assent in 2010 and repealed previous anti-bribery/corruption legislation. It covers the public and private sector. The purpose of the legislation is to simplify the law on bribery and to allow a more effective response to bribery offences that occur either in the UK or abroad.
- (b) The main offences covered by the Act are:
 - (i) An offence of active bribery (i.e. giving, promising or offering a bribe), which applies in the public or private sector.
 - (ii) An offence of passive bribery (i.e. requesting, agreeing to receive or accepting a bribe), which applies in the public or private sector.
 - (iii) A specific offence of bribing a foreign public official.
 - (iv) A new ‘corporate’ offence which applies where a corporate body or partnership fails to prevent persons performing services on their behalf from paying bribes.

5. Duties, Roles and Responsibilities

5.1 *Trust Board of Directors*

The Trust board of directors should

- (a) Ensure a commitment to a zero-tolerance approach to fraud, bribery and corruption against the Trust.
- (b) Receive assurance that the Trust has adopted and is operating adequate procedures and controls to deter and prevent wrongdoing from occurring, in compliance with the NHS England Standard Contract and the NHSCFA “Standards for Providers”.

- (c) Gaining assurance that adequate arrangements are in place to ensure that all staff are aware of the standards of personal and professional behaviour expected of them; and that all staff have access to this policy.

5.2 Chief Executive

The Chief Executive is responsible for:

- (a) The use of overall funds entrusted to the organisation.
- (b) Ensuring policies, procedures and processes are adequate to protect the organisation and the appropriate use of public funds.

5.3 Director of Finance and Information

The Director of Finance and Information is the lead for all counter fraud; bribery and corruption work at the Trust and is responsible for:

- (a) Monitoring and ensuring compliance with SC24 of the NHS England Standard Contract.
- (b) Ensuring that an annual risk assessment is carried out by the Trust.
- (c) Managing the continuity of appointment of a qualified LCFS to the Trust; and ensuring that the counter-fraud service continues to be delivered in the event of the departure, or long term absence of the appointed LCFS.
- (d) Overseeing the delivery of services from the LCFS.
- (e) Providing the relevant required support to the LCFS in any investigations that they carry out.
- (f) Depending on the outcome of investigations (whether on an interim/on-going or concluding basis) and/or the potential significance of suspicions that have been raised, inform the accountable officer accordingly.
- (g) Informing and consulting the Chief Executive in cases where the loss may be above the agreed limit or where the incident may lead to adverse publicity.

5.4 Audit Committee

The Audit Committee is responsible for:

- (a) Ensuring that the annual counter fraud workplan is adequate and provides a reasonable balance between raising fraud awareness across the Trust and evaluating the effectiveness of the Trust's counter-fraud systems and controls.
- (b) Ensuring that it receives periodical reports from the LCFS on the progress against the workplan and update of the progress of any investigations.

- (c) Ensuring that it receives a formal annual report of the Trust's compliance with the standards set by NHSCFA.

5.5 Internal and External Audit

Internal and External Audit are responsible for:

- (a) Passing on to the nominated LCFS, any incident or suspicion that comes to internal or external auditors' attention. The outcome of the investigation may necessitate further work by internal or external audit to review systems.

5.6 Workforce and Organisational Development (Workforce & OD)

Workforce & OD are responsible for:

- (a) Liaising with managers and the LCFS from the outset if an employee is suspected of being involved in fraud, bribery or corruption in accordance with agreed liaison protocols. Workforce and OD employees are responsible for ensuring the appropriate use of the Trust's Disciplinary Policy and Procedure.
- (b) Advising those involved in the investigation on matters of employment law and other procedural matters, such as disciplinary and complaints procedures, as requested. Close liaison between the LCFS and Workforce & OD is essential to ensure that any parallel sanctions (i.e. criminal, civil and disciplinary sanctions) are applied effectively and in a coordinated manner.
- (c) Taking steps at recruitment to establish, as far as possible, the previous record of potential employees, as well as the veracity of required qualifications and memberships of professional bodies, in terms of their propriety and integrity. In this regard, temporary and fixed-term contract employees as well as staff with honorary contracts are treated in the same manner as permanent employees.

5.7 Local Counter Fraud Specialist (LCFS)

The LCFS is responsible for:

- (a) Regularly reporting on the progress of the investigation and when/if referral to the Police is required.
- (b) Ensuring that the director of finance and information is informed about all referrals/cases.
- (c) The day-to-day implementation of the NHSCFA operational framework, in particular, the investigation of all suspicions of fraud.
- (d) Reporting any case to the police or NHSCFA as agreed and in accordance with the NHSCFA Counter Fraud and Corruption Manual.
- (e) Reporting any case and the outcome of the investigation through NHSCFA's national case management system.

- (f) Ensuring that other relevant parties are informed where necessary, e.g. Human Resources (HR) will be informed if an employee is the subject of a referral.
- (g) Ensuring that the Trust's incident and losses reporting systems are followed.
- (h) Ensuring that any system weaknesses identified as part of an investigation are followed up with management.
- (i) Adhering to the Counter Fraud Professional Accreditation Board (CFPAB's) Principles of Professional Conduct as set out in the NHSCFA Counter Fraud and Corruption Manual.
- (j) Ensuring that the director of finance and information is informed of NHSCFA investigations, including progress updates.
- (k) Liaising on a regular basis with the trust secretary to review the maintenance of records including the registers of interests, gifts and hospitality.
- (l) Liaising with relevant third parties such as External Audit or the Police at the earliest opportunity, as circumstances dictate.

5.8 Managers

Managers have a responsibility to:

- (a) Ensure that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively. The responsibility for the prevention and detection of fraud, bribery and corruption therefore primarily rests with managers but requires the co-operation of all employees.
- (b) Ensure that procedures to guard against fraud and corruption are followed. They should be alert to the possibility that unusual events or transactions could be symptoms of fraud, bribery and corruption. If they have any doubts, they must seek advice from the nominated LCFS.
- (c) Instil and encourage an anti-fraud, anti-bribery and anti-corruption culture within their team and ensure that information on procedures is made available to all employees. The LCFS will proactively assist the encouragement of an anti-fraud culture by undertaking work that will raise fraud awareness.
- (d) Report all instances of actual or suspected fraud or corruption which come to the attention of the manager. It is appreciated that some employees will initially raise concerns with their manager. However, in such cases, managers must not attempt to investigate the allegation themselves; they have the clear responsibility to refer the concerns to the LCFS as soon as possible.
- (e) Inform staff of the Trust's Standards of Business Conduct and Counter Fraud, Bribery and Corruption policy as part of their induction process, paying particular attention to the need for accurate completion of personal records and form.

- (f) Ensure that all employees for whom they are accountable are made aware of the requirements of the policy.
- (g) Assess the types of risk involved in the operations for which they are responsible.
- (h) Ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, staff rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews, reconciliations and test checks to ensure that control measures continue to operate effectively.
- (i) Ensure that staff only have access to computer systems or petty cash where it is appropriate to their Trust duties.
- (j) Be aware of the Trust's Local Counter Fraud, Bribery and Corruption policy and the rules and guidance covering the control of specific items of expenditure and receipts.
- (k) Identify financially-sensitive posts in order to understand where the risk of loss is greatest within their area of responsibility.
- (l) Ensure that controls are being complied with.
- (m) Contribute to assessment of the risks and controls within their business area.

5.9 Managers of procuring or commissioning services

All managers responsible for procuring or commissioning services will:

- (a) Ensure that special regard is paid to the Public Contracts Regulations 2015, and to the requirements of the Bribery Act 2010: that all organisations from which services are procured have proportionate controls and checks on their staff to deter and prevent all forms of wrongdoing, including bribery.

5.10 All Employees

All employees are required to:

- (a) Act in accordance with the applicable standards set by their professional body, and have a personal responsibility to ensure that they are familiar with them.
- (b) Protect the assets of the Trust, including information, goodwill and property.
- (c) Comply with all applicable laws and regulations relating to ethical business behaviour, procurement, personal expenses, conflicts of interest, confidentiality and the acceptance of gifts and hospitality.
- (d) Avoid acting in any way that might cause others to allege or suspect them of dishonesty.

- (e) Behave in a way that would not give cause for others to doubt that the Trust's employees deal fairly and impartially with official matters.
- (f) Be alert to the possibility that others might be attempting to deceive.
- (g) Ensure that public funds are safeguarded, whether or not they are involved with cash or payment systems, receipts or dealing with contractors or suppliers.
- (h) Report any suspicions of fraud or corruption to their nominated LCFS.

5.11 Digital Services

The Chief Information Officer and all Information Asset Owners have a responsibility to:

- (a) Contact the LCFS immediately in all cases where there is a suspicion that digital systems are being used to commit fraud (often running concurrently with offences under the Computer Misuse Act 1990).
- (b) Similarly, the head of IM&T, all other information asset owners and other relevant colleagues will liaise closely with the LCFS to ensure that a Subject's access (physical and electronic) to Trust ICT systems is suspended or removed where an investigation identifies that it is appropriate to do so.

5.12 Freedom to Speak Up Guardian

The freedom to speak up guardian (trust secretary) has a responsibility to:

- (a) Inform the LCFS of all concerns relating to fraud, bribery and corruption which arise through the reporting processes set out in the Freedom to Speak Up Policy.

6. Policy Statement

6.1 Fraud, Bribery and Corruption

- (a) All fraud, bribery and corruption (collectively referred to as economic crime) in the NHS is unacceptable and should not be tolerated. It affects the ability of the NHS to improve health outcomes for people in England, as resources are wrongfully diverted and cannot be used for their intended purpose. In addition, the Trust's reputation can also be damaged when employees are involved in economic crime.
- (b) The Trust conducts risk assessments in line with Ministry of Justice guidance to assess how bribery and corruption may affect the Trust. Where risks are identified, they are mitigated with proportionate procedures.
- (c) All staff must be aware of the Trust's Staff Conduct policy and the Register of Interests, Gifts and Hospitality policy and comply with the conditions, in particular the following areas:
 - (i) Declarations of interest;

- (ii) Gifts; and
- (iii) Hospitality and sponsored events.
- (d) All interests, gifts, hospitality and sponsored events must be declared using the Trust's online 'Declaration of Interest Form', available on the Corporate Governance workspace area of the Intranet². If employees are in any doubt they should seek guidance from the Trust Secretary.

6.2 Reporting Fraud, Bribery and Corruption – Response Plan

- (a) If an employee has any suspicion of fraud, bribery or corruption, they must inform the nominated LCFS or the Trust's director of finance and information, unless the director of finance and information or LCFS is implicated. If that is the case, they should report it to the Chair or Chief Executive, who will decide on the action to be taken.
- (b) Details of how to contact your LCFS and the NHSCFA can be found at Appendix D.
- (c) Anonymous letters, telephone calls, etc. are occasionally received from individuals who wish to raise matters of concern, but not through traditional channels. While the suspicions may be erroneous or unsubstantiated, they may also reflect a genuine cause for concern and will always be investigated and/or used to build intelligence.
- (d) The LCFS will make sufficient enquiries to establish whether or not there is any foundation to the suspicion that has been raised. If the allegations are found to be malicious, they will also be considered for further investigation to establish their source.

6.3 Speaking Up

- (a) To support the reporting of fraud via the LCFS and through NHS CFA Fraud and Corruption Reporting Line, all employees are reminded of NHS Improvement and NHS England's: Freedom to speak up: raising concern's (whistleblowing) policy for the NHS, April 2016. These form the minimum standard to help normalise the raising of concerns in the NHS for the benefit of all patients in England.
- (b) The Trust's freedom to speak up guardian can be contacted on 0117 342 2888 or by emailing raisngconcerns@uhbristol.nhs.uk
- (c) Any concerns of fraud, bribery or corruption raised through the Trust's Freedom to Speak Up Policy will be directed to the LCFS for intelligence purposes.

² <http://workspaces/sites/Boards/CorporateGovernance/default.aspx>

6.4 *Disciplinary Action*

- (a) The disciplinary procedures of the Trust must be followed if an employee is suspected of being involved in a fraudulent or otherwise illegal act.
- (b) It should be noted, however, that the duty to follow disciplinary procedures will not override the need for legal action to be taken (e.g. consideration of criminal action). In the event of doubt, legal statute will prevail.
- (c) In accordance with the NHSCFA Counter Fraud and Corruption Manual, the director of finance and information, in conjunction with the LCFS, will decide whether or not a case should be referred to the police. Any referral to the police will not prohibit action being taken under the local disciplinary procedures of the Trust.
- (d) The LCFS, in consultation with the director of finance and information, will investigate an allegation in accordance with procedures documented in the NHS CFA Counter Fraud and Corruption Manual.
- (e) In certain circumstances, evidence may best be protected by the LCFS recommending to the Trust that the staff member is suspended from duty. The Trust will make a decision based on HR advice on the disciplinary options, which include suspension.
- (f) The Trust will follow its disciplinary procedure if there is evidence that an employee has committed an act of fraud, bribery or corruption.

6.5 *Sanctions and Redress*

The types of sanction that may apply when an offence has occurred are:

- (a) Civil – Civil sanctions can be taken against those who commit fraud, bribery and corruption to recover money and/or assets which have been fraudulently obtained, including interest and costs.
- (b) Criminal – The LCFS will work in partnership with NHSCFA, the police and/or the Crown Prosecution Service to bring a case to court against an alleged offender. Outcomes can include cautions, fines and/or imprisonment.
- (c) Disciplinary – Where events giving rise to disciplinary action are the subject of legal proceedings, the Trust may take disciplinary action before such legal proceedings are concluded. This will depend on advice from the police or other prosecuting bodies, including the LCFS on whether it is appropriate to continue with the Trust's disciplinary process. The disciplinary policy can be found at: http://hrweb/Pages/category.aspx?HR_Category=Disciplinary
- (d) Professional body disciplinary – If warranted, staff may be reported to their professional body as a result of a successful investigation and/or prosecution.
- (e) The Trust will seek financial redress whenever possible to recover losses to fraud, bribery and corruption. Redress can take the form of confiscation and

compensation orders, a civil order for repayment, or a local agreement between the organisation and the offender to repay monies lost.

6.6 Support for Staff

- (a) There are groups and individuals who can provide support for staff who feel they need to talk to someone about issues for work. This could be due to the effect on a team following an investigation (e.g. a reduction in workforce following the dismissal of a team member). Support available is as follows:
 - (i) The Joint Union Office – phone 0117 34 20826 or email union@uhbristol.nhs.uk
 - (ii) The Employee Services team – 0117 34 25000, option 3
 - (iii) The Staff Counselling team – 0117 34 20611/20612
 - (iv) The Occupational Health Department – 0117 34 23400
 - (v) Medical Career Support – 0117 34 20057
 - (vi) Trust Chaplains – phone 0117 34 26799 or email chaplaincy@uhbristol.nhs.uk

7. Standards and Key Performance Indicators

7.1 Applicable Standards

NHS Counter Fraud Authority Standards for Providers: <https://cfa.nhs.uk/counter-fraud-standards>

7.2 Measurement and Key Performance Indicator

The director of finance and information and the LCFS will agree annual and specific measures of the effectiveness of this policy.

As a minimum, the LCFS will report annually on the number and nature of instances of suspected wrongdoing reported. This report will include details of outcomes and consequences to the individuals involved.

The director of finance and information will commission the LCFS to carry out an annual review of the levels of awareness of this policy and its contents amongst staff.

The LCFS will, through the annual programme of work, determine the effectiveness of the Trust's controls and other efforts to prevent and deter wrongdoing.

The results of these audits will be reported in the LCFS annual report to the Audit Committee. Delivery of actions agreed to address weaknesses and lapses identified in the implementation of the policy will be monitored by the Audit Committee.

7.3 *Dissemination of this Policy*

This policy will be available on the Trust intranet site, on the Document Management System (DMS).

A Trust-wide email will be issued to all members of staff to inform them of the policy update.

The policy will be referred to at induction and in relevant training and development programmes.

7.4 *Review of this Policy*

This policy will be reviewed at least annually by the LCFS to ensure all contact details and guidance is up to date.

This policy will be formally reviewed by the LCFS three years from the date of issue.

8. References

Fraud Act 2006: <https://www.legislation.gov.uk/ukpga/2006/35/contents>

Bribery Act 2010: <https://www.legislation.gov.uk/ukpga/2010/23/contents>

Theft Act 1968: <https://www.legislation.gov.uk/id/ukpga/1968/60>

Computer Misuse Act 1990: <https://www.legislation.gov.uk/ukpga/1990/18>

The Public Contracts Regulations 2015: www.legislation.gov.uk/uksi/2015/102/contents/made

9. Associated Documentation

Freedom to Speak Up Policy:

- <http://nww.avon.nhs.uk/dms/Download.aspx?r=1&did=7822&f=FreedomToSpeakUpPolicy-1.pdf>

Staff Conduct Policy:

- <http://www.uhbristol.nhs.uk/media/2977229/staffconductpolicy-4.pdf>

Disciplinary Policy and Procedure:

- <http://nww.avon.nhs.uk/dms/Download.aspx?did=7799>

Register of Interest, Gifts and Hospitality Policy:

- <http://nww.avon.nhs.uk/dms/Download.aspx?did=8948>

Standing Financial Instructions:

- <http://nww.avon.nhs.uk/dms/Download.aspx?did=4338>

10. Appendix A – Monitoring Table for this Policy

The following table sets out the monitoring provisions associated with this Policy.

Objective	Evidence	Method	Frequency	Responsible	Committee
Increased Fraud, Bribery and Corruption Knowledge	Crime Reduction Day Evaluation	Staff Evaluation Form	Annually	LCFS	Audit Committee
Increased awareness of the LCFS	Crime Reduction Day Evaluation	Staff Evaluation Form	Annually	LCFS	Audit Committee
More knowledge of methods of reporting.	Crime Reduction Day Evaluation	Staff Evaluation Form	Annually	LCFS	Audit Committee

11. Appendix B – Dissemination, Implementation and Training Plan

The following table sets out the dissemination, implementation and training provisions associated with this Policy.

Plan Elements	Plan Details
The Dissemination Lead is:	Elias Hayes, Local Counter Fraud Specialist
This document replaces existing documentation:	Yes
Existing documentation will be replaced by:	[DITP - Existing documents to be replaced by]
This document is to be disseminated to:	All Staff, Contractors, Patients and the General Public
Method of dissemination:	Newsbeat, Intranet, Website
Training is required:	Not Applicable
The Training Lead is:	Local Counter Fraud Specialist

Additional Comments	
[DITP - Additional Comments]	

12. Appendix C - Equality Impact Assessment

Further information and guidance about Equality Impact Assessments is available here:

<http://nww.avon.nhs.uk/dms/download.aspx?did=17833>

Query	Response
What is the main purpose of the document?	To provide guidance to staff on all matters relating to Fraud, Bribery and Corruption.
Who is the target audience of the document? Who is it likely to impact on? (Please tick all that apply.)	All staff, patients and contractors

Could the document have a significant negative impact on equality in relation to each of these characteristics?	YES	NO	Please explain why, and what evidence supports this assessment in relation to your response.
Age (including younger and older people)		X	This policy seeks to ensure the proper use of public funds by and within the Trust. It should impact equally on all groups.
Disability (including physical and sensory impairments, learning disabilities, mental health)		X	
Gender reassignment		X	
Pregnancy and maternity		X	
Race (includes ethnicity as well as gypsy travelers)		X	
Religion and belief (includes non-belief)		X	
Sex (male and female)		X	
Sexual Orientation (lesbian, gay, bisexual, other)		X	
Groups at risk of stigma or social exclusion (e.g. offenders, homeless people)		X	
Human Rights (particularly rights to privacy, dignity, liberty and non-degrading treatment)		X	

Will the document create any problems or barriers to any community or group? YES / NO

Will any group be excluded because of this document? YES / NO

Will the document result in discrimination against any group? YES / NO

If the answer to any of these questions is YES, you must complete a full Equality Impact Assessment.

Could the document have a significant positive impact on inclusion by reducing inequalities?	YES	NO	If yes, please explain why, and what evidence supports this assessment.

Status: Approved

The master document is controlled electronically. Printed copies of this document are not controlled. Document users are responsible for ensuring printed copies are valid prior to use.

Will it promote equal opportunities for people from all groups?		X	
Will it help to get rid of discrimination?		X	
Will it help to get rid of harassment?		X	
Will it promote good relations between people from all groups?		X	
Will it promote and protect human rights?		X	

On the basis of the information/evidence so far, do you believe that the document will have a positive or negative impact on equality? (Please rate by circling the level of impact, below.)

Positive impact				Negative Impact		
Significant	Some	Very Little	NONE	Very Little	Some	Significant

Is a full equality impact assessment required? ~~YES~~ / NO

Date assessment completed: 4 January 2019

Person completing the assessment: Elias Hayes

13. Appendix D – LCFS and NHSCFA Contact Details

LCFS	
Name	Elias Hayes
Phone	0117 34 20828 or 07920 284239
Email	elias.hayes@nhs.net
Address	ASW Assurance Counter Fraud Services, level 3c Whitefriars, Lewin's Mead, Bristol, BS1 2NT.

NHS Counter Fraud Authority	
Website	https://cfa.nhs.uk/
Phone	24 hour confidential fraud reporting hotline powered by Crimestoppers: 0800 028 4060
Online	You can report fraud using the online NHS fraud reporting tool: https://cfa.nhs.uk/reportfraud