Countering Fraud in the NHS in Wales

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Foreword by Jane Hutt, Assembly Minister for Health and Social Services

This document sets out the special arrangements that have been put in place to protect the NHS from fraud and reinforces the National Assembly for Wales’ commitment to reduce fraud to an absolute minimum over the next 10 years. Fraud in the NHS is unacceptable. It is right and proper that the NHS in Wales should be protected from the small minority of patients and staff who deprive the NHS of vital resources for patient care.

Agreement has been reached between the National Assembly for Wales and the Department of Health in England to establish a professional Counter Fraud Service for Wales by the formation of a specialist Welsh unit to tackle fraud in the NHS in all its forms.

By identifying areas where the risk of fraud exists, detecting fraud which has already occurred, taking firm action against the perpetrators, and designing systems to prevent the occurrence of fraud in all its forms, the Assembly aims to develop a culture within the NHS in Wales which raises awareness of the existence of fraud and encourages vigilance and co-operation of all those who are responsible for NHS resources.

While the prime responsibility for countering fraud rests with Welsh health bodies, the Assembly has become a partner in the Counter Fraud Operational Services already in existence in England, and will be able to draw on the established expert support and the investigative and training services necessary to achieve the targets set by the Assembly.

This goal will not be achieved overnight. But the measures now in place and further initiatives which will be developed over the coming years will ensure that fraud in NHS Wales is reduced to an absolute minimum and that NHS resources are not lost to fraud at the expense of patient services.

The importance of ensuring that staff dedicated to this work are highly trained and operate within well-defined parameters cannot be emphasised enough, and it is essential that work to counter fraud and corruption is carried out to the highest standards. That is why we wish to ensure that counter fraud staff act on sound principles of good practice. To this end, the Assembly has also agreed with the Department of Health that all Welsh counter fraud staff will receive comprehensive specialist training from their own training unit. This training – to recognised standards – will be provided for all staff in the new Counter Fraud Operational Service team in Wales and for nominees from all health authorities and NHS trusts.
For too long, the cost to us all of fraud and corruption has been allowed to remain invisible in our society. By taking a robust and professional lead on these problems in the context of the NHS, we aim to raise counter fraud work to a new level of quality and efficiency, and to directly support improved patient care and services.

JANE HUTT

Assembly Minister for Health and Social Services
SECTION 1
THE COUNTER FRAUD POLICY

1. INTRODUCTION

This document has been produced in order to establish and explain the framework within which the National Assembly for Wales (the Assembly), in partnership with the Department of Health in England, plans to tackle the problem of fraud in the NHS in Wales.

A strategy for dealing with fraud in the NHS in Wales will be introduced and developed, which is comprehensive, integrated and professional.

Fraud is a type of crime that can be difficult to identify. A non-violent and sometimes entirely paper-based activity, fraud tends towards being invisible and there may not be any immediately apparent victim. This is particularly the case in public sector organisations, where large sums of money and resources must be administered on behalf of the taxpayer.

We are all the victims of fraud in public services. Money provided by taxpayers is stolen and the public is denied the proper level of service that it is entitled to expect. Fraud is theft and is morally wrong in itself and, in the case of fraud within public services, another reason it is so wrong is that it deprives society of resources which could otherwise be used for better systems and better services. Counter fraud work should therefore be seen not as an end to itself, but as a means of making the best possible use of NHS resources.

This link between the need to tackle fraud and the level of public service which can be provided means that the Assembly’s strategy adopts the principle that an effective strategy to combat NHS fraud cannot be detached from other strategies needed to ensure the proper management of the NHS in Wales.

The strategy for dealing with fraud should dovetail with the provision of new, improved quality NHS services as the NHS Plan for Wales “Improving Health in Wales” is implemented. Effective fraud controls are needed, while keeping to a minimum any increased bureaucracy which might have a damaging effect on relationships between NHS professionals and patients.

The Assembly will work with all those involved in delivering NHS services to ensure that providing excellent service and dealing with fraud are entirely complementary.

The Directorate of Counter Fraud Services (DCFS) was created in 1998 within the Department of Health and this new Directorate established the Counter Fraud Operational Services (CFOS) within the NHS in England, with separate units within each NHS region in England drawing on centrally established expert support and investigative services. The Directorate has also set up the Counter Fraud Training Service (CFTS) which provides counter fraud accredited training for the NHS.
Recognising the need to address the problem of fraud in an "intelligent" manner, the Assembly has formed a partnership with the Department of Health to establish a specialist counter fraud unit in Wales, funded by the Assembly and based in Gwent. The CFOS Wales unit will have full access to the training and support functions within DCFS, whose monitoring and compliance functions will be applied to the NHS in Wales and subject to the reporting arrangements agreed between CFOS and the Assembly. In addition, each health authority and NHS trust in Wales will appoint a Local Counter Fraud Specialist (LCFS) who will be trained by CFTS to an accredited standard. The CFOS team in Wales will work with the NHS in Wales to counter fraud wherever it is identified.

The Director of Counter Fraud Services will be answerable directly to the Assembly for operations within Wales and for effectiveness in delivering the Assembly’s policy and strategy for countering fraud and corruption within the NHS in Wales.

The Director will have direct responsibility for developing policy and strategy and for all operational work, through CFOS, to complement the counter fraud and corruption work already being undertaken by the NHS in Wales. Here the responsibility of the Director of Counter Fraud Services will involve advice, guidance and the setting and monitoring of standards.

This document outlines the overall strategic framework within which the Assembly will meet its remit - the policy, aims and objectives together with the approach, tactics and standards it proposes to adopt - and explains plans to win the maximum support for this work. The chapter on "Action" explains how targets will be set for counter fraud work and how the Assembly will translate its strategic aims into operational action to deliver against those targets.

The main aims of the Assembly’s strategy are to reduce fraud to an absolute minimum within 10 years; to put in place arrangements to hold it at that absolute minimum level permanently; and to target more NHS resources at providing better patient care.

To achieve these goals, the strategy outlines seven main types of generic action to be taken:

- the creation of an anti-fraud culture
- the maximum deterrence of fraud
- the successful prevention of fraud which cannot be deterred
- the prompt detection of fraud which cannot be prevented
- the professional investigation of detected fraud
- effective sanctions, including appropriate legal action against those committing fraud
- effective methods for seeking redress in respect of money defrauded
Specialist processes to counter fraud and corruption are part of the public’s definition of a modern organisation and professionalism is the key to success. This is not only in order to be effective but also to generate the widest possible support for the work. It is particularly necessary given the scale and diversity of the NHS as a whole – the largest organisation in Europe.

While it is entirely natural that the most professional approach possible should be taken in an organisation including existing deep-rooted and respected professions, it is the case that, hitherto, there is no long history of professional specialist counter fraud work. This makes it even more important to spell out exactly what is meant by a professional approach.

The key elements of a professional approach are:

- measuring the PROBLEM accurately
- developing a clear STRATEGY
- creating an effective STRUCTURE
- taking ACTION in all key areas
- adopting the right APPROACH
- applying the highest STANDARDS
- generating and maintaining SUPPORT

and, most important

- having the necessary, specialist SKILLS

As part of the partnership with the DCFS, the Assembly has recruited NHS counter fraud specialists who have the necessary competencies to enable them to tackle this difficult task. The DCFS is committed to giving these specialists the highest quality skills-based training and encouraging their further academic development. The Assembly is also committed to providing detailed training for NHS staff to ensure that there is a real level of understanding about the organisational environment. However, professionalism is about more than this.

Whether undertaking operational or policy-based work, Welsh NHS counter fraud specialists will not only have the highest levels of technical skills, but will also be required to apply those skills within a clear ethical framework. Professional standards will be protected because only those who successfully complete both of these elements of the training will be eligible for professional accreditation. Over time, this accreditation will become a requirement of working in the specialist area.

By working together, with common skills, having received common training, and using a common “language” of countering fraud, these specialists will develop a formidable body of knowledge about the problem of NHS fraud in Wales instead of repeatedly attempting to reinvent the wheel. The key will be developing
expertise specific to this extraordinary organisation and to Wales in particular. This professional body of knowledge will ensure that the best solutions are applied as problems arise.

This work is about the protection of something important to all of us. These methods are in the best traditions of the NHS – traditions of professionalism, fairness and dedication. The NHS is a national treasure and it deserves the best possible level of care and protection. In undertaking this task counter fraud specialists not only wish to free up resources for better patient care but also to reinforce the public’s trust and confidence in the organisation that serves them. The National Assembly for Wales is committed to achieving these goals.

JIM GEE

Director of Counter Fraud Services
2. COUNTER FRAUD POLICY

Fraud occurs within the NHS. Examples of individual frauds have come to light and studies revealing the types of fraud that take place demonstrate that action is needed. In particular, reports by the Auditor General for Wales, the National Audit Office, the Audit Commission, and the Healthcare Financial Management Association indicate the existence of a very wide range of types of fraud within the NHS.

The Report of the Efficiency Scrutiny into prescription fraud published in 1997 estimated losses from patient charge evasion and theft and forgery of forms, excluding additional losses from contractor fraud, at between £80 and £100 million across Wales and England. The Welsh Office, and now the National Assembly for Wales, have taken steps in recent years to assist trusts and health authorities (HAs) to counter fraud, some of whom have responded well to counter fraud initiatives already in place.

Pharmacists in Wales dispense some 40 million items a year at a gross expenditure in Wales on prescribed drugs and appliances of more than £380 million, a figure equivalent to 13 per cent of the total estimated expenditure on the National Health Service in Wales. A significant number of people are exempt from prescription charges because of their age or their medical condition or because they are in receipt of a social security benefit which in turn allows them to have their prescriptions dispensed free of charge.

The Assembly has been concerned for some time that potential revenue from prescription charges was being lost. On 1 April 1999 new checks were introduced in England and Wales at the Point of Dispensing which required individuals to produce evidence to confirm to the pharmacist their eligibility for exemption from prescription charges. The aim of the new arrangements was to reduce the element of loss of income rather than eliminate it.

The report of the Auditor General for Wales, "Maximising Income from Prescription Charges", published in 2000, examined the arrangements in place in Wales and found that in 9 per cent of those cases where an individual had claimed exemption from prescription charges there was, prima facie, no entitlement to exemption. On this basis, he has estimated that the potential income foregone as a result of allowing exemption from prescription charges to individuals who did not meet the relevant criteria was in the order of £15 million a year.

Individual HAs and trusts in Wales are tackling fraud when it is identified, but not on a co-ordinated all-Wales basis. More needs to be done. There is a clear recognition among professionals within the NHS of the existence of the problem and of the need for an operational service to counter all types of fraud and to provide national coverage.
While the main responsibility for deterring, detecting and countering fraud will remain with the NHS in Wales, the measures the Assembly will take as part of its strategy for Wales will further encourage and support this work. The new structure will provide that support and will give the Assembly clear information about the extent and success of anti-fraud work in the NHS in both the primary and secondary sectors in Wales.

Following the 1997 Efficiency Scrutiny of prescription fraud and the Auditor General for Wales’ report last year, the Assembly is overseeing the implementation of action plans already underway to address this problem. Specific targets for fraud reduction will be set once the results of fraud measurement work currently underway in parts of NHS Wales are known.

Work is already in progress to re-emphasise to NHS pharmacy contractors the need for Point of Dispensing checks on patients’ claims to exemption. The Assembly has also introduced similar checks on entitlement to exemption from charges within the dental and optical services. In 2001-02, penalty charges are to be introduced, to be levied where it is established that someone has fraudulently claimed help with health costs for themselves or someone else.

But, while awareness of the problem of fraud in the NHS has grown and action to tackle fraud within Family Health Services in Wales has already begun; there has not been a comprehensive integrated strategy for dealing with all NHS fraud, nor a language or programme which has allowed real strategic discussion to take place. The Assembly’s work to deal with fraud will make good these deficiencies.

Developing, implementing, managing, monitoring and revising counter fraud policy requires clear agreement on its purpose. The policy as described above is to create a strategic framework - based on aims and objectives - within which the tactics to be applied can sit.

The starting points for policy development should be:

- overall policy aims and objectives set by the Assembly; and
- quality information about the nature of the problem and the effectiveness of existing action to tackle it, derived from the most effective measurement processes possible.

The second of these starting points requires knowledge of:

- how the problem of fraud, and the success in tackling it, can best be measured; and
- the nature of the risks that need to be managed.

We must be clear about the skills that are needed to develop counter fraud policy. We must also be clear about the skills needed to successfully implement counter fraud policy. Competencies must be identified for each relevant post and these need to inform recruitment procedures and to be reflected in training.
Since policy should determine structures, revision of existing structures may be necessary in order to deliver a successful counter fraud strategy. Key elements include:

- establishing working structures which ensure an ongoing integration of policy and practice and an outcome-focused approach to counter fraud work - the remit of the new Welsh unit will be to set up a new anti-fraud structure to assist the NHS in Wales to identify potential for fraud, and to assist the NHS in Wales in tackling fraud wherever it is identified;

- all organisations involved in countering fraud becoming "learning organisations", with every effort made to ensure that knowledge gained of systematic failures which allow fraud to occur is used in analysing and addressing weaknesses in those systems; and

- the appointment of a senior official in overall charge of counter fraud work within the NHS in Wales. The Director of Counter Fraud Services has been given this role, and he will be accountable to the Assembly.

As part of the Assembly’s agreement with the Department of Health, the Welsh CFOS unit will be directly accountable to the DCFS which will report to the Assembly. The DCFS will retain sole responsibility for the day to day management of the team and will develop reporting links with the Assembly to ensure that the Assembly’s policy objectives are reflected in the work of the CFOS (Wales) unit.

At every level within involved organisations there must be clear accountability for implementation of counter fraud policy and management of counter fraud work, and recognition and support will need to be given for responsibilities in counter fraud work:

- work to counter fraud work must be a core management responsibility, which should be reflected in job descriptions and appraisal processes; and

- awareness of and involvement in counter fraud work should become a general responsibility of all professionals, to be supported by independent practitioners and staff.
3. **AIMS**

This chapter explains the high level, underlying aims of the National Assembly’s counter fraud strategy. Clarity is essential in focusing all work in this area in the same direction. The aim not only to keep fraud under control, but also:

- to reduce fraud to an absolute minimum within a set timescale;
- to put in place arrangements to hold fraud at a minimum level permanently; and
- by so doing, make more resources available in Wales for patient care.

**To Reduce Fraud to an Absolute Minimum**

With its first aim, the Assembly does not propose merely to tinker with the problem of fraud or create the appearance of tackling it. Rather, it intends to adopt a position of zero tolerance where fraud will be unacceptable. Fraud must be reduced to an absolute minimum level as quickly as possible.

*The Assembly aims to reduce the amount of fraud in the NHS in Wales to an absolute minimum within 10 years.*

A robust measure of the amount of fraud will need to be developed, and a prioritised action plan for dealing with it. Unless this is done, it will not be possible to ensure that counter fraud action is being correctly prioritised and that the use of available resources is being targeted at the areas most at risk of losses to fraud.

*The measurement programme will begin with the problem of prescription fraud and will produce the most robust figures possible on the size of this problem.*

*The measurement programme will continue, and measurement methodologies will be developed, to measure the size of other types of NHS fraud in Wales, focusing initially on Family Health Services and including use of existing information held by health authorities, the Dental Practice Board, and the Prescribing Service Unit.*

Further details on measurement of fraud in NHS Wales are in Chapter 9.

**To Hold Fraud at a Minimum Level**

The Assembly’s second aim is to ensure that, as fraud is addressed, lessons are learned of how it has been perpetrated and this knowledge will be used to inform the development of measures to prevent fraud. This link between practical knowledge of fraud and future systems to prevent it will be crucial in building secure systems.

**To Release Resources for Patient Care**

Fraud will be tackled because this is morally the right thing to do. But counter fraud work will not be pursued as an end in itself. The most powerful incentive
to tackle this problem is the need to ensure that resources are not lost to fraud but are used for better systems and services delivering improved patient care.

The third aim is therefore to link counter fraud work with overall improvements to the service provided by the NHS in Wales. This is the underlying purpose of the Assembly’s counter fraud work and needs to be stated.

To implement these high level aims, a solid framework, is needed consisting of:

- the Assembly’s **objectives** - in support of these aims;
- its **approach** to reaching these objectives;
- the **tactics** to be adopted within the strategic framework;
- the **standards** to be applied to this work; and
- the **support** needed in order to succeed.
4. **OBJECTIVES**

This chapter outlines the seven specific objectives of the Assembly’s strategy, which are defined and described below:

- the creation of an **anti-fraud culture**;
- maximum **deterrence** of fraud;
- successful **prevention** of fraud which cannot be deterred;
- prompt **detection** of fraud which cannot be prevented;
- professional **investigation** of detected fraud;
- effective **sanctions**, including appropriate legal action against people committing fraud; and
- effective methods for seeking **redress** in respect of money defrauded.

**Objective:** To create an anti-fraud culture in which countering fraud is the joint responsibility of all those involved in giving political direction, determining policy, and management of the NHS.

The pervasiveness of fraud throughout the NHS has helped to give it the appearance of acceptability in some cases. This attitude still persists within some groups in society despite growing evidence that the public consider that crimes against the NHS, even if petty, are not acceptable.

These notions need to be dispelled, and a zero tolerance attitude to fraud developed. Work to tackle fraud cannot be seen as an "add-on" to the NHS.
Instead, it needs to be an element in the Assembly’s development of all policies and in their subsequent implementation.

In working towards such a culture, all those working in Wales in NHS management, independent practitioners, and NHS staff need to “own” this approach. Education and support from the centre will be needed to help secure this.

**Objective:** To ensure that the totality of anti-fraud measures represents the strongest deterrent possible to those perpetrating or considering perpetrating fraud

The most preferable way of minimising fraud is to ensure that fraudsters and potential fraudsters are deterred from even trying to perpetrate fraud. The most effective fraud deterrent would be peer group pressure, within a culture which rejects the idea of fraud as acceptable, values services provided and disapproves of those who would abuse them through fraud.

As such an anti-fraud culture develops, deterrence can in practice be achieved where strong prevention, detection, investigation, sanction and redress processes are in place and effective publicity and communication are developed around them.
Objective: To develop the most effective preventative measures so that, if fraud is attempted, it will fail

If it is not possible to deter fraudsters, then the next most preferable course of action is to prevent fraud from succeeding before there is any loss to public funds. This can be achieved by developing systems with administrative or technical features that make them less vulnerable to fraud.

To this end the strongest possible preventative measures are needed. This objective, in particular, is a key element in influencing policy design and the development of future administrative systems and processes. The need for preventative measures is therefore a main message within the drive to make counter fraud work an integral part of NHS management.

A real anti-fraud culture encourages both staff and the public to actively defend the service and provide assistance and information.

DEVELOPING AN ANTI-FRAUD CULTURE
Objective: to establish the most effective processes to detect fraud

Existing fraud is present within the NHS. Additionally, there will always be those intent on finding new ways to perpetrate fraud, and it may not always be possible to prevent them from succeeding. We must therefore have as an objective the ability to detect existing and new frauds effectively.

Detection processes must discover fraud at the earliest possible stage, and effective liaison procedures must ensure that prompt action is taken to minimise losses to public funds.

Objective: To develop a highly skilled body of professional investigators able to investigate any detected fraud objectively.

Once a possible fraud is detected, it is essential that it is investigated in the most professional, objective and timely manner possible.

In order to match and exceed the level of skills and techniques used by those who would commit fraud, a level of investigative skill needs to be developed which will allow investigations to be brought to satisfactory conclusions, allowing appropriate sanctions to be applied and redress sought for losses to public funds.
Objective: To take appropriate legal action and apply realistic sanctions for people or organisations where an investigation reveals fraud

Following investigation of fraud, we need to ensure that effective sanctions, including legal action where appropriate, are taken in respect of those investigated.

It may be necessary to shape and develop the law and regulatory frameworks within the NHS in Wales, ensuring that they are concise and unambiguous, and therefore effective tools in anti-fraud work. Again, this aspect of our counter fraud work must be linked into the overall strategy, and must not be allowed to become a separate specialist area. This will mean ensuring that there is integration of investigative and legal skills and practices.
**Objective:** To use all possible means to seek redress in respect of money lost to fraud

Seeking redress is an area of anti-fraud work which, in general terms, has been neglected in the past. Where redress has been pursued, this has tended to be done as a separate activity.

But alongside effective investigation leading to appropriate sanctions, the recovery of defrauded money should be an essential part of the Assembly’s overall strategy in order to ensure that fraud does not pay, whatever the legal outcome of an investigation.

These objectives reflect the proposed methodology to assess NHS fraud problems and identify solutions. It is important to recognise how these objectives support each other. There is of course a balance to be struck between these objectives and it should also be recognised that the balance between them will change as the NHS in Wales moves from a situation where it is vulnerable to fraud to one where there are effective preventative systems in place and there is less fraud to detect.
5. APPROACH

Having defined our aims and objectives, this chapter explains the approach the Assembly will take in working towards them. The approach will be:

- inclusive;
- professional;
- comprehensive;
- fair;
- balanced;
- cost effective; and
- specialist.

Inclusive

All those who are stakeholders in this project must be involved, and every area where skills can be of use must contribute. Proposals for countering fraud must be formulated and implemented taking account of the need for the full involvement of professionals and staff working within the NHS in Wales and taking full advantage of opportunities for multi-agency working.

Professional

The Assembly’s work to counter fraud must be undertaken with professionalism and to the highest standards. Indeed, the base on which all counter fraud work will rest is the body of available skills. This will need to be developed in a focused way, to attract skilled people to the work and to give them the support that they will need to achieve the Assembly’s targets. Section 2 of this document sets out the Assembly’s professional and ethical approach to countering fraud in the NHS in Wales.

Comprehensive

Every area of fraud within the NHS in Wales must be tackled. Equally, all appropriate methods must be used to tackle it. The effort to counter fraud should not be artificially limited or skewed towards one counter fraud method, or to tackling one type of fraud. There should not be any "safe" areas for fraud where difficulties or sensitivities are allowed to moderate the Assembly’s aims and objectives.

Fair

In all the Assembly’s counter fraud work it must act, and be seen to act, fairly. Principles of good practice will be developed and applied consistently. In particular, high standards of objectivity must be applied.
**Balanced**

All types of fraud will be tackled, always seeking to strike a balance between addressing very common high volume but low value fraud and higher value, complex and sophisticated fraud.

It will be important to prioritise the work programme so that the most money can be saved in the short-term - possibly through straightforward preventative measures - but also to deal effectively with skilled fraudsters who may represent an equally significant threat in the longer term.

**Cost Effective**

As with any area of work involving public funds, there is a clear duty to spend money wisely. Work to counter fraud, particularly in relation to the amounts of public money which can be safeguarded or recovered, can be highly cost effective.

The cost effectiveness of counter fraud work in Wales will continue to be measured and, while it must be accepted that some areas of work may appear to give better returns than others, a comprehensive programme of counter fraud work across the whole range of the Assembly’s objectives will continue to be prioritised.

**Specialist**

There can be no question that safeguarding public money against fraud is an area where specialist skills are essential. The complex nature of the problem and corresponding complexity of solutions to it make this a crucial factor.

In all counter fraud work, staff with a level of expertise will be recruited and developed, which will allow prompt and effective action to be taken, recognising the importance of the sums of public funds at stake.
6. TACTICS

This chapter explains the Assembly’s proposed tactics for actions to counter NHS fraud, within the strategic framework.

Flowing from the strategic framework, specific action plans will be developed for tackling each individual area of fraud in the NHS in Wales, taking full regard of the context of the problem. Initial action plans will continue to focus on addressing fraud in the Family Health Services, the NHS area where the most information is currently available about the amount lost to fraud. The Assembly’s priorities will change as the scale of other fraud problems is assessed and plans for dealing with them are drawn up.

The Assembly’s proposed action in relation to generic issues that are central to counter fraud work can be outlined as follows:

- **measurement** - which began with prescription fraud and which will continue with a comprehensive programme to assess accurately the totality of NHS fraud;

- **information** - where the most advanced Information Technology available will be used and which will ensure that there is access to, and the means to analyse accurately, all information necessary for the Assembly’s counter fraud aims to be achieved;

- **professionalism** – agreement has already been reached with the Counter Fraud Training Services which has been established as a centre of excellence in England to ensure that counter fraud staff of CFOS Wales receive accredited training in the skills and competencies required for fraud investigation;

- **linking policy and practice to ensure the most effective counter fraud measures are devised and successfully implemented.**

In particular, measuring the size of the problem is key to developing the counter fraud action plan. The extent of fraud across all of NHS Wales is not currently known; however, it is known that reports and studies into other types of fraud show an ever-increasing trend in the number and size of reported frauds, and that continued developments in ways of recording and accounting for fraud have tended to expose more fraud than had previously been thought to exist.

**The Level of Fraud**

The Efficiency Scrutiny of prescription fraud examined estimates of the amounts of fraud perpetrated on the activities of a variety of public and private sector organisations, and found a range of losses due to fraud within their businesses or spending programmes of 3 per cent to 8 per cent.
Given that organisations with simple, centrally controlled systems tend to be less vulnerable to fraud and that organisations with complex, delegated systems tend to be more vulnerable, it could reasonably be expected that the overall risk of fraud in the NHS as a whole would be high. Since dedicated counter fraud work within the NHS in Wales has only begun comparatively recently, it could also reasonably be expected that the risk of fraud has indeed translated into actual losses.

What can be said with certainty from the work already undertaken in England is that the more that fraud in the NHS is looked for, the more can be found. With large sums of public money at stake, it can be seen how central the issue of measurement of different types of fraud is. It is needed in order to be sure that counter fraud resources are being directed and prioritised in the most effective way so that the aim of reducing fraud can be achieved within satisfactory timescales.
7. STANDARDS

This chapter explains the standards to which counter fraud work will be undertaken and the methodology for assuring that those standards are being met:

- the quality processes to be applied;
- how compliance with good practice guidance can be assured;
- how continuous learning and continuous improvement can take place; and
- how quality assurance can be provided.

Quality Processes

In order to ensure that counter fraud work is managed in the most efficient way, available quality management standards will be examined to establish which are most suitable, both for use within the new Welsh CFOS unit and for counter fraud work within Welsh health bodies. Formal accreditation for all counter fraud quality management processes will be sought.

The Assembly's intention in developing the use of the most up to date quality processes goes beyond the counter fraud remit. The counter fraud organisation within the NHS should become a leader in promoting efficient use of modern quality systems and management within the broader organisation. There is a need to promote counter fraud work widely within the NHS in Wales to ensure an integrated approach to the problem of fraud.

Compliance with Good Practice Guidance

Of great importance to preventative counter fraud work are high standards in operating administrative and payment systems. Alongside use of formal quality standards, the Assembly will produce comprehensive good practice guidance for all professionals and staff, looking outwards and learning wherever possible from other public and private sector organisations.

Compliance with guidance will also be monitored. The effectiveness of monitoring compliance systems will be reviewed and, subject to the findings, the potential advantages of the creation of an inspectorate function for this purpose will be explored.

Continuous Learning

In order to strengthen and benefit from the interrelations between different areas of counter fraud work, it must be ensured that opportunities to learn from operational experiences are not missed.

The knowledge derived from detective and investigative work will be used to design the strongest possible systems. In this sense, it must always be ensured that knowledge is increased through practical experience of fraud problems
tackled and that future preventative policy work is up to date with the reality of the fraud risks faced.

**Quality Assurance**

Progress in dealing with fraud on a regular basis will be reviewed. The widest possible accountability for discharging our counter fraud responsibilities will be introduced by following this initial strategic document at appropriate intervals with regular reports on achievements and the development of the Assembly’s plans and these reports will be publicly available. The aim is for openness and transparency in all the Assembly’s counter fraud work.
8. SUPPORT

This chapter outlines the areas from which support for the strategy is needed and how that support can be won. Support, as described below, will be needed from four main areas:

- executive support;
- financial support;
- public support; and
- professional and staff support.

**Executive Support**

In order to succeed in reaching specified targets, executive support is needed from all levels of Welsh NHS management. Work undertaken to counter fraud can have a beneficial impact in other areas of the organisation, highlighting inefficiencies and helping to alleviate problems of low morale.

**Financial Support**

Without adequate investment, it will be impossible to realise the aim of reducing fraud to an absolute minimum level. All organisations that have made progress in tackling fraud have made initial financial investments in order to produce medium and long-term results.

The Assembly has begun with its investment in the new Welsh CFOS team and also by raising the profile of fraud issues across the NHS in Wales.

**Public Support**

This area of work must be actively promoted, emphasising that fraud against the NHS is real crime and that public funds that are saved or recovered can be used positively. The Assembly’s intention is to make clear that counter fraud work is intended to enable the targeting of resources at genuine need.

Counter fraud work in Wales will be carried out fairly, but in a determined and objective manner. Any cynicism about what can be achieved must be overcome in order to build public faith in the NHS through assurance that public funds are being properly used.

**Professional and Staff Support**

All those working in the NHS need to be motivated with the message that this is a socially responsible area of work in which the vast majority of honest people all have an important role to play.
Counter fraud work can protect and enhance the reputation of the NHS, freeing up the resources that professionals and staff need to be able to deliver the best possible service in the way that they would prefer.

In order to win the support needed from these areas, a comprehensive communications strategy will be developed and promoted which explains counter fraud work in Wales and its wider importance to each target audience.

It must be recognised that the active assistance of all those working within the NHS and of the general public is needed and every effort must be made to gain and to justify their help.
9. ACTION

The section describes the initial, practical steps that which will be taken to turn the strategy into successful counter fraud action.

**Information**

Access to information is essential to analysis of fraud problems and to operational work to tackle fraud. Information is held in many places throughout the NHS. This includes both administrative records and confidential patient...
records. Access to confidential patient information is subject to legal restrictions that we will of course observe.

Subject to legal restrictions, those working throughout the NHS in Wales will be required to supply relevant information wherever it is held, in order to develop the knowledge needed to identify systems weaknesses and to carry out counter fraud operations.

**Measurement**

The Assembly’s commitment to reduce NHS fraud in Wales to an absolute minimum in 10 years will entail milestone targets within that period. But it would be wrong to set those targets now, before there is an accurate picture of the amount of fraud that exists.

The measurement process that will be developed will involve exhaustive examination of statistically valid samples of Welsh NHS spending in order to extrapolate the most accurate figures possible for these estimates. This examination will be carried out using the widest possible sources of information in order to demonstrate whether, on the balance of probabilities, a particular example is fraudulent or not. Examination processes will be such as to provide the best possible information available.

*Following statistically valid, investigative examinations of areas of Welsh NHS spending, the Assembly will announce financial milestone targets for reductions in fraud within the overall 10 year commitment, with the first targets set by the end of 2001/02.*

**Operations**

In order to enable the effective detection and investigation of fraud, professional counter fraud officers will be needed in each area of the NHS in Wales. The necessary resources will be invested in order to build comprehensive counter fraud coverage and to put in place the staff and equipment needed:

- specialist, targeted guidance will be provided relating to each area of known NHS fraud and, based on the evidence from the measurement process, comprehensive action plans for each of these areas be developed; and

- professional counter fraud training will be provided for designated staff of Welsh health bodies and financial incentives will be reviewed so that they are able to direct specialist resources at their fraud problems.

Investigation of detected fraud, and allegations of fraud, will begin immediately. Throughout 2001/02 a unified counter fraud structure will be built - supporting action in local health bodies - which is capable of reacting promptly to suspicions of fraud that arise, and of proactively targeting areas where there is a high risk of fraud. All staff engaged in Welsh NHS counter fraud work will be required to be
trained and accredited by the DCFS in order to ensure that work is undertaken to common, high standards.

*The Assembly is committed to providing resources for this work and to ensuring that there are staff available in all areas, with the professional training and support that they will need in order to successfully tackle fraud.*

The end result of this operational counter fraud work will be:

- more fraudsters detected;
- more prompt and effective investigations;
- tough sanctions applied where fraud is proven;
- less money lost to fraud and more stolen money recovered from fraudsters; and
- more NHS resources targeted where they are genuinely needed.
10. VISION

The ultimate aim of all the Assembly’s counter fraud work is to support improved NHS services in Wales. Stopping the theft of public money by fraudsters brings with it the added bonus of being able to see that money deployed for the public good, as the taxpayer intended.

Counter fraud work will be entirely in tune with, and will directly support, the Assembly’s Plan for the NHS in Wales “Improving Health in Wales”. It aims for the highest standards of stewardship of public funds, and for quality and efficiency in the best possible use of NHS resources.

The Assembly is therefore working towards a vision of the NHS where:

- secure systems are in place and, where new types of fraud occur, they can be identified quickly and knowledge of how they are perpetrated can be fed back into the process of preventing them occurring again;
- professionals and managers within the NHS see responsibility for counter fraud awareness and initiatives as an integral part of their roles and duties;
- there are professional and well-trained counter fraud staff available to all parts of the NHS where they are needed; and
- public attitudes demonstrate that fraud within the NHS is clearly unacceptable, and there is widespread support for the Assembly’s counter fraud work.
SECTION 2
THE PROFESSIONAL AND ETHICAL APPROACH

1. INTRODUCTION

This section contains details of the essential elements that form the new Professional and Ethical Approach to counter fraud work in the NHS in Wales:

- the required competencies for Counter Fraud Specialists
- specialist training – both Foundation and Advanced levels
- the learning route that links practical skills-based training and academic learning
- the professional accreditation process
- the ethical framework – the context for this work

Although there has been some good work to counter fraud and corruption in some areas of the NHS, it is time for a new improved, professional approach. It is important not only to build on what already exists, but to share good practice and help develop expertise in all areas of NHS business. For the first time in the NHS in Wales, a fully professional, specialist and co-ordinated approach will be taken in uncovering and combating fraud and corruption in all areas.
2. **THE REQUIRED COMPETENCIES**

It is important to be clear from the outset what skills are needed to tackle the problem of fraud. It follows that common core competencies should exist for all Counter Fraud Specialists in the NHS.

Counter Fraud Specialists do not need to be experts in every field, however, they do need to combine these skills to counter fraud effectively.

The common core competencies have been listed by area of generic action:

*The creation of an anti-fraud culture*
- the ability to contribute to the creation of strong anti-fraud culture
- an understanding of the complex nature of organisational cultures and of how they can be changed

*The maximum deterrence of fraud*
- the ability to effectively present and explain counter fraud work to achieve the greatest deterrent effect
- an understanding of how fraud and corruption is deterred

*The successful prevention of fraud which cannot be deterred*
- the ability to incorporate streamlined preventative counter fraud measures into the design of mainstream organisational processes
- the ability to maintain effective links between operational feedback and policy design in order to reduce fraud to an absolute minimum
- an understanding of the broader policy context and of the need to balance measures to combat fraud with other policy objectives

*The prompt detection of fraud which cannot be prevented*
- an understanding of where information relevant to a fraud can be found
- the ability to continually develop sources of information
- the ability to access – in a lawful and appropriate manner – information and evidence from the widest possible range of sources
- an understanding that fraud often stretches across organisational and process boundaries
- an understanding of how information from different sources can relate
The professional investigation of detected fraud

- an understanding of the financial and legal implications of decisions made during the course of the investigation
- the ability to collate information with proper regard to the rules of evidence
- the ability to assess evidence against the full range of sanctions which might be appropriate

Effective sanctions, including appropriate legal action against those committing fraud

- the ability to coherently present evidence to support proceedings relating to sanctions
- the ability to pursue a case by means of a criminal prosecution if appropriate

Effective methods for seeking redress in respect of money defrauded

- an understanding of the ways in which redress that can be sought and of the evidential requirements
- an understanding of the specialist support needed by organisations seeking redress
3. THE LEARNING ROUTE

Skills-based training is essential to enable the highest standards to be applied to counter fraud work, but the learning does not have to stop there. Further specialist skills can be acquired by the continuation of studying through the learning route.

The Directorate of Counter Fraud Services (DCFS) and the Institute of Criminal Justice Studies at the University of Portsmouth (ICJS) have co-operated to link the skills-based training into a course of academic learning that can lead to academic qualification at BSc and MSc degree levels. As part of the agreement between the Assembly and the Department of Health, Welsh Counter Fraud Specialists will have full access to this training. The benefits of this learning route are:

- as each level of study has been successfully completed academic credits are awarded towards higher levels of study
- the credits earned are a recognition of study undertaken in the learning route
- the progressive means by which higher levels of academic qualification may be achieved lend accessibility not experienced elsewhere

There are two stages of training. They are:

- Foundation Level
- Advanced Level

The DCFS have obtained accreditation for the skills-based Foundation Level training from the ICJS. The Foundation Level is assessed to a pass/fail standard and only those who reach a high standard will be awarded the Accredited Counter Fraud Specialist (ACFS) qualification. It is in recognition of this high professional standard that the ICJS have agreed to accredit the qualification.

Foundation Level accreditation confers academic credits which can allow entry to a year-long distance learning Advanced Level course covering the issues of fraud and corruption in more depth and looking at the key policy and strategic issues. Those who complete this course successfully will be awarded a Certificate of Higher Education and will be awarded the Certified Counter Fraud Specialists (CCFS) qualification.

A diagram outlining the learning route follows:
The Learning Route:
Practical Skills-Based Training Leading To Advanced Academic Study

**FOUNDATION LEVEL**

- Investigation, law and procedures
- Investigative interviewing
- Proactive investigation or proactive evidence gathering
- Principles of good practice workshop

**QUALIFICATION:**
Accredited Counter Fraud Specialist

**ADVANCED LEVEL**

**PROFESSIONAL DEVELOPMENT PROFILE**
20 Credits

<table>
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<th>STUDY</th>
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<th>UNIT</th>
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<td>10 Credits</td>
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</tbody>
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- Introduction to criminal justice studies
- Introduction to criminology and fraud
- Nature of public sector fraud & corruption and counter fraud strategies
- Fraud management
- Principles of data analysis, intelligence gathering and data protection

**QUALIFICATIONS:**
Certified Counter Fraud Specialist
Certificate of Higher Education in Counter Fraud and Criminal Justice Studies

**QUALIFICATION:**
BSc Degree

**QUALIFICATION:**
MSc Degree
4. COURSE DELIVERY

Both Foundation and Advanced Level courses are modular in design. The modules are delivered using a variety of teaching methods including attendance at residential courses, student participation and skill assessments.

Each course contains an element of distance learning. In order that students get the most from the Foundation Level course, it is fully residential and students are urged to stay at the accommodation arranged for them unless there are exceptional circumstances.

The distance learning allows students to prepare for the subsequent residential course. This enables all students attending the course to begin with the same standard of knowledge so more time can be spent on practical skills during the residential part of the course. Each student is provided with a training pack with all the information needed to complete the distance learning element of the module.

The modules require a significant level of commitment. If delegates have not spent the necessary amount of time studying their pre-course materials, they will find themselves at a serious disadvantage.

Each module involves study at the NHS Counter Fraud Training Service centre of excellence. Study is based around student-centred learning with role-play and practical exercises. Courses are restricted to a maximum of twelve students and led by two trainers. This is the optimum number of students to ensure that individuals receive the appropriate amount of attention and allows for effective group work.

The Advanced Level course takes place over a year and is primarily organised on a distance learning basis with some residential study schools. Participants need to be able to commit themselves to serious study over this period to benefit properly from the course and the high quality academic input from the ICJS.
5. FOUNDATION LEVEL - ACCREDITED COUNTER FRAUD SPECIALIST

The Foundation Level qualification has been developed by specialist practitioners in the counter fraud field to reflect the operational needs of Counter Fraud Specialists, providing a common standard of core skills and levels of knowledge.

Four training modules have been developed to encapsulate the competencies of counter fraud staff. This has been further translated into the practical skills required to effectively tackle fraud in the NHS.

The four modules are as follows:

- Investigation, Law and Procedures
- Investigative Interviewing
- Proactive Investigation or Proactive Evidence Gathering
- Principles of Good Practice

The aim of these modules is to prepare Counter Fraud Specialists for their role and to ensure competence in conducting criminal investigations (both reactive and proactive), from receipt of initial information through all stages to presentation of evidence at court.

The intended outcome at completion of the Foundation Level is that delegates will have acquired a set of generic skills that can be applied across the range of areas where fraud is investigated. This requirement is necessary because Counter Fraud Specialists will need to apply their expertise to a variety of situations as the countering of fraud and corruption within the NHS develops and expands.

The aims and objectives of the training modules are as follows:

**Investigation, Law and Procedures**

*Aims*

To train Counter Fraud Specialists in the skills and procedures of investigations suited to their needs.

*Objectives*

At the conclusion of the course delegates will be able to:

- demonstrate an excellent knowledge of relevant Police and Criminal Evidence Act 1984 (PACE) legislation
- demonstrate skills in search procedures and exhibit handling
- understand the relevant civil and criminal law as it relates to their role
demonstrate competence in court procedures
demonstrate a working knowledge of disclosure rules in relation to the Criminal Procedure and Investigation Act 1996

Investigative Interviewing

Aims

To train Counter Fraud Specialists in the skills and abilities necessary to construct effective interviews with witnesses and suspects with integrity and in accordance with current legislation.

Objectives

At the conclusion of the course delegates will be able to:

• Prepare and plan the interview
• Show competence in the use of the PEACE model
• Apply the relevant sections of PACE and the Criminal Justice and Public Order Act 1994
• Demonstrate the use of cognitive and conversation-management methods of interviewing
• Deal with suspects, witnesses and victims in an ethical and non-discriminatory manner
• Conduct an interview in accordance with the national principles of investigative interviewing as recommended by Association of Chief Police Officers (ACPO)
• Demonstrate the correct procedures of recording interviews which includes taped interviews

The Proactive Courses

Responding to the different operational roles that some Counter Fraud Specialists perform, two courses have been devised to accommodate the differing needs that arise. In practice there is little difference in these courses and this is reflected in the number of common objectives. Delegates will study one of the two courses and the Counter Fraud Training Services will determine which one this is. The courses are:

• Proactive Investigation
• Proactive Evidence Gathering

Aims

To provide Counter Fraud Specialists with up-to-date information regarding the
best practice methods used in proactive operational work. To standardise procedures to enable students to organise and manage operations to a high standard of professionalism.

Common Objectives

Lists objectives common to both Proactive Investigation and Proactive Evidence Gathering courses.

At the conclusion of the course delegates will be able to:

- Demonstrate a good knowledge of proactive investigation
- Use photography correctly in surveillance situations
- Work effectively as a team and with other agencies and organisations carrying out surveillance
- Correctly state the duties of the officer in charge
- Be confident in the use of the correct glossary for covert operations
- Prepare an Operational Order and conduct a briefing
- Prepare, plan and set up covert observation posts in accordance with national recommendations
- Have knowledge of the relevant law surrounding covert surveillance
- Correctly carry out the duties of loggist

Additional Objectives

Proactive Investigation

At the conclusion of the course delegates will be able to:

- Carry out Level II Surveillance as defined by ACPO recommendations 1994
- Correctly carry out surveillance using public transport
- Prepare and plan an operation to carry out live surveillance

Additional Objectives

Proactive Evidence Gathering

At the conclusion of the course delegates will be able to:

- Compile a file for prosecution
- Have a basic understanding of computer forensics
- Have knowledge of forensic evidence gathering procedures available to the Counter Fraud Specialist
**Principles of Good Practice**

**Aims**

That Counter Fraud Specialists gain an understanding of how to apply the Principles of Good Practice to their day-to-day work and to understand the broader context of counter fraud work and the need for a professional and ethical approach.

**Objectives**

At the conclusion of the course delegates will be able to:

- Understand how the principles link to the skills-based training courses
- Gain an awareness of negative and stereotypical representation of those who counter fraud
- Appreciate the need for a professional image for counter fraud specialists and to banish old, negative images
- Gain an understanding of the Principles of Good Practice, why we need them and how they inter-connect.
- Learn to apply the principles to their day-to-day work
- Appreciate the broader context of counter fraud work and how non-adherence to the principles could have an adverse impact upon the perception of the counter fraud profession as a whole

Successful completion of the Foundation Level Training means that delegates can apply for accreditation as an Accredited Counter Fraud Specialist (ACFS).
6. ADVANCED LEVEL - CERTIFIED COUNTER FRAUD SPECIALIST

To ensure continuous development further training has been designed to lead officers into academic study to broaden their professional skills base.

Successful completion of the Foundation Level allows counter fraud staff to register with the ICJS for this higher education course.

The DCFS in England have developed this qualification in conjunction with the ICJS which comprises a number of course units:

- **Skills Study Unit.** This is preparation for academic study. Learning how to approach studying: including distance learning, referencing, note-taking, essay construction, examination skills.

- **Professional Development Profile.** This helps students to demonstrate critical understanding of their role in their professional organisation and the role of their organisation in society by planning, designing and completing an individual project.

- **Introduction to Criminal Justice Studies**

- **Introduction to Criminology and Fraud**

- **The Nature of Public Sector Fraud and Counter Fraud Strategies**

- **Fraud Management**

- **Principles of Data Analysis, Intelligence Gathering and Data Protection**

The Advanced Level course is delivered through:

- Specially produced distance learning study materials delivered to home addresses; and

- A telephone tutor and email support service

Completion of the Advanced Level yields higher education course credits which, combined with the accreditation of prior learning from the Foundation Level, results in the attainment of a Certificate of Higher Education in Counter Fraud and Criminal Justice Studies.

Successful completion of the Advanced Level course also means that students can apply for accreditation as a Certified Counter Fraud Specialist (CCFS).
7. Accreditation

Accreditation gives official recognition of approval to both the training courses and the training provider.

The DCFS, in partnership with the ICJS, have created an accreditation process so that all courses that are completed successfully attract credits. Under this accredited prior learning scheme, all learning is recognised. If students wish to undertake further study the credits that they have already gained can be used to help achieve other qualifications. The benefits include:

- linking the practical, ethical and academic approaches to countering fraud
- study can be completed at the student’s convenience
- study can be tailored to gain entrance to further study such as BSc and MSc degrees

In order to administer the accreditation process the DCFS and the ICJS have formed a Counter Fraud Professional Accreditation Board (CFPAB). Where the required courses have been passed, students may apply to the CFPAB to be awarded either the ACFS or CCFS accreditation.

Successful completion of the ACFS and CCFS courses yield 120 accredited prior learning credits, or the equivalent to the first year of a full-time undergraduate degree. This allows students wishing to access an undergraduate course direct entry onto a degree programme at the beginning of the second year. Qualification at degree level could ultimately lead to further academic study such as a Master’s degree.

To provide professional consistency in the provision of counter fraud training, accreditation was sought from a higher education institution. The ICJS was chosen for their academic expertise in the field of fraud, criminal justice and criminology and because of their flexible and modern approach to study.
8. THE ETHICAL FRAMEWORK - PRINCIPLES OF GOOD PRACTICE

Technical skills alone are not enough. It is important that they are applied in an appropriate ethical manner. A framework of principles of good practice clearly states the standard of conduct expected from counter fraud specialists.

There are six principles that underpin all counter fraud work in the NHS. These principles are a supplement to policy, rules and guidance set out elsewhere in greater detail and should also be read in conjunction with the statement of required competencies for counter fraud specialists (see chapter 2).

The six principles of good practice are as follows.

**Professionalism**

Counter Fraud Specialists should maintain the highest standards of professionalism, in the best tradition of the existing NHS professions. Specifically this should cover areas of personal conduct, expertise and all work taken to counter fraud. Any information or evidence must be obtained in a proper legal manner and recorded accordingly. The reputation of the NHS must be paramount and officers must not bring it into disrepute by any of their actions.

**Objectivity**

Counter Fraud Specialists should undertake all work with an open mind, and in particular ensure that any evidence or information obtained is assessed without preconceptions. Consideration should be given to all interpretations that may be placed on such evidence or information.

**Fairness**

Counter Fraud Specialists should act in a courteous, polite and considerate manner, and conduct all work applying proper standards of fairness and without discrimination in accordance with the current Equal Opportunities Policy.

**Expertise**

Counter Fraud Specialists have a duty to maintain the highest level of expertise and to ensure that this is applied thoroughly and comprehensively in every aspect of counter fraud work that is undertaken.

**Propriety**

Counter Fraud Specialists have a duty to ensure that they meet the highest standards of propriety. It must be ensured that in all personal and financial areas the integrity of those undertaking counter fraud work is never
undermined. Proper, accurate records, which meet the legislative requirements, must be kept on all aspects of work with particular reference to issues of confidentiality so that information is passed only to those who are entitled to receive it.

It is not enough merely to ensure that this propriety is maintained it is also essential that there is never any perception of impropriety.

**Vision**

Counter Fraud Specialists should ensure that the work undertaken is understood in the context of all action taken to counter fraud and corruption and develop an anti-fraud culture. This should also include promoting fraud awareness generally, encouraging the active participation of other relevant agencies and the implementation of a clear multi-agency approach.

Work continues to build a comprehensive Code of Conduct on the firm basis of these principles.
9. FURTHER STUDY

Students can use the credits attained from the Foundation and Advanced Level courses towards further study.

After successful completion of the Advanced Level within the Certificate of Higher Education in Public Sector Investigation and Criminal Justice Studies, students will be able to study for a:

- Diploma of Higher Education in Criminal Justice Studies
- BSc (Hons) in Criminal Justice Studies
- MSc in Criminal Justice Studies

The Institute of Criminal Justice Studies at the University of Portsmouth is developing a range of higher education awards for all public sector Counter Fraud Specialists within the framework of criminal justice studies. These courses offer the opportunity to study areas specifically relevant to countering fraud in the public sector. There are also other courses dealing with wider issues of criminal justice.

The ICJS already delivers the programme that is available either as a full-time or part-time programme by attendance at the University, or by distance learning.
10. CONCLUSION

The Assembly’s mission is to promote a standard of excellence among Counter Fraud Specialists in Wales, enhance public confidence in the profession and provide a programme of progressive study. The Professional and Ethical Approach meets these objectives and sets new heights in professional counter fraud training.

Professionalism recognises a need to meet the unique requirements of counter fraud staff through the training outlined in this document. In doing so the Assembly has sought to achieve a balanced and integrated approach by providing a broad range of skills-based, academic and ethical training.

The high standards reflect the ambitions and objectives of the National Assembly for Wales in the quest to counter fraud and corruption in the NHS in Wales. Professionalism is key to its objective of effectively tackling fraud, because in order to safeguard public money against fraud specialist skills are essential.
APPENDIX 1

GLOSSARY

Accreditation
Provision of a credential recognising attainment of a defined set of competencies or learning outcomes – awarded by the Counter Fraud Professional Accreditation Board (CFPAB).

Accredited
Indication that official recognition of approval has been given to a course, a programme of training, or a provider of training.

Accredited course
A course that has been approved by an accrediting body, the successful completion of this course (or courses) leads to an accreditation.

Accredited prior learning
Candidates who have been successful at Foundation and Advanced Levels can gain course exemptions on higher education courses.

Competency
A specification of knowledge and skills, and their application, within an occupation or industry level to the standard of performance required in employment.

Learning outcome
Learning outcomes specify what a person should be able to demonstrate as a result of skills and knowledge gained from a module or programme of training.

PEACE model
This was originally developed by the Association of Chief Police Officers in 1992 in recognition of the more professional approach required by professional interviewers.

PEACE (a mnemonic) offers a structured approach to investigative interviewing incorporating cognitive and conversation-management methods of interviewing.
Required competencies

Standards based on the organisation of work and expressed in terms of workplace outcomes, which describe what a competent worker does in the workplace. Such standards are normally developed and/or endorsed by the relevant industry.

Skills assessment

A process of collecting evidence of a person’s competency and making judgements as to whether they have met the required competencies.

Skills-based learning

A skills-driven approach to organising employee development that focuses on developing skills during the courses.
APPENDIX 2

BACKGROUND TO THE INSTITUTE OF CRIMINAL JUSTICE STUDIES

The Institute of Criminal Justice Studies (ICJS) of the University of Portsmouth is a principal provider of higher education programmes for criminal justice professionals in the UK. Set up in 1991, the Institute is a multi-disciplinary unit within the School of Historical and Social Studies of the University of Portsmouth. The staff of the Institute includes sociologists, criminologists, psychologists and other social scientists that specialise in, and conduct research into, aspects of criminal justice.

The Institute provides a growing number of courses at both undergraduate and postgraduate level. The vast majority of courses are delivered by distance learning methods. At undergraduate level most students are serving police officers, but new programmes are being launched which are specially designed for probation officers, risk and security managers, counter fraud specialists, civilian employees of the police service, special constables, and stadium security specialists. At postgraduate level, those studying include: probation officers, social workers, lawyers, prison officers and other criminal justice professionals as well as those studying out of general interest.

The Institute has close to 1,000 students working at all levels of the available higher education programmes. Particularly important features of the calendar of available courses are the Partnership Programmes between ICJS, the Metropolitan Police and the Directorate of National Police Training. These programmes have been a key feature in the development of the Institute since its commencement and are principally associated with the Certificate of Higher Education in Policing. In addition, the Institute, in association with the Directorate of National Police Training, has developed a second Certificate Level course, the Certificate of Higher Education in Policing and Police Studies, which is available for police officers serving in police forces outside the Metropolitan Police.
ANNEX

CONTACT LIST

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