

COUNTER FRAUD COMMUNICATIONS POLICY

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Should a member of staff or any other person require access to this policy in another language or format (such as Braille or large print) they can do so by contacting the communications department or the relevant policy holder. NHS Central Lancashire will do its utmost to support and develop equitable access to all policies.

Managers are responsible for ensuring staff within their area of responsibility are aware of NHS Central Lancashire policies and that staff adhere to them.

Managers are responsible for ensuring that a system is in place for their area of responsibility that keeps staff up to date with new policy changes.

Staff are responsible for ensuring they are familiar with policies, know where to locate the documents on the NHS Central Lancashire's website, and seek out every opportunity to keep up to date with them

Independent contractors are expected to identify a lead person to be responsible for ensuring staff employed within their practice are aware of NHS Central Lancashire policies.

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1 INTRODUCTION

The NHS budget for England for 2010/11 is £112 billion. While the majority of people who work in or use the NHS are honest, fraud does exist and is a serious issue. We all pay when the dishonest minority seeks to defraud the NHS of these valuable funds. NHS Central Lancashire works closely with its Local Counter Fraud Specialist (LCFS) Deborah Carr to fight fraud by implementing policies and procedures to prevent fraudsters succeeding and also by creating an anti fraud culture throughout the Trust.

1.1 Scope

All staff, patients and members of the public have a role to play in protecting our resources. This document applies to all NHS Central Lancashire staff and reinforces the unacceptability of fraud, the processes for reporting fraud or raising concerns, and assurances that any concerns will be treated in the strictest confidence.

Aim

The overall aim of this policy is to support the work of reducing the impact of fraud on NHS Central Lancashire

1.2 Principles

This document sets out the principles, tactics and actions for counter fraud communications.

The specific objectives are:

- To raise awareness of the damage caused by fraud to the NHS, and the impact this can have on resources available for health care
- To reinforce the culture that fraud is unacceptable and must never be tolerated
- To raise awareness of the role of the LCFS and the Counter Fraud Service, emphasising the message that when fraud is detected the punishments are severe
- To ensure staff understand their roles and responsibilities in tackling fraud
- To ensure staff are aware of the procedures in place for reporting suspicions and raising concerns about possible fraud.
- To put in place appropriate arrangements to publicise any successful local fraud prosecutions
- To ensure that stakeholders, including the regional Counter Fraud Manager, are kept informed of local efforts to combat fraud

2 COUNTER FRAUD COMMUNICATIONS POLICY

An essential part of counter fraud work is communications and publicity. By raising awareness of the damage caused to the NHS by fraud, individuals will become aware of their roles and responsibilities in tackling fraud, and of the actions to take if they suspect fraud.

3 IMPLEMENTATION

Various communications messages, tactics and channels are required for the diverse target audiences. The main audiences, messages and communications tools are set out in this section.

3.1 PCT Board and Audit Committee

Members of the Board and Audit Committee require assurance that all appropriate measures are in place to prevent and detect fraud. This will be provided through regular reports to the Director of Finance, Audit Committee, and the submission of Audit Committee minutes to the Board.

3.2 PCT Senior Managers

Senior Managers have a particular role to play in establishing the culture of the organisation and emphasising the unacceptability of fraud. The LCFS is available to reinforce this message by attending staff briefings and is able to give support and advice to members of staff with concerns. Senior Managers need to be familiar with the relevant policies and procedures.

3.3 PCT Staff

Staff are probably the most important target audience for this policy. Key messages for staff include the unacceptability of fraud, the processes for reporting fraud or raising concerns, and assurances that any concerns will be treated in the strictest confidence.

These messages are reinforced through the existing staff communications channels including induction training sessions, mandatory risk training sessions, the staff newsletter, staff surveys, LCFS newsletter 'Fraud Guardian', information printed on payslips and posters distributed across the Trust. National fraud awareness campaigns are localised where possible so that national and local messages reinforce each other.

In addition any media publicity about successful fraud prosecutions will be used at every opportunity, including all training sessions delivered by the LCFS.

All staff with access to the Trust Intranet will be able to contact the LCFS to report any potential fraud and/or corruption.

3.4 Patients and Families

The key message is that we are safeguarding NHS Central Lancashire resources to provide better healthcare. In addition we aim to ensure that

members of the public are aware that they can report concerns about possible fraud in confidence and that they know how to do this.

Posters in waiting areas of health service premises will give the confidential number to call to report suspicions. NHS Central Lancashire is committed to ensuring patients or clients whose first language is not English also receive the information to report any suspicions of fraud. Translated information is available upon request from the Local Counter Fraud Specialist (LCFS). Local media coverage of any successful prosecutions will highlight action taken to safeguard resources.

3.5 The Local Community

The taxpayer also needs to know that we are safeguarding NHS resources. The main route to communicate with them is through the local media. We will endeavour to gain editorial coverage for any anti-fraud campaigns that take place within NHS Central Lancashire, and for any successful prosecutions. In addition, Primary Care Trust Board meetings are open to the public, with all reports available through the Primary Care Trust website – and this will of course include reports relating to fraud policy, etc.

3.6 The Regional Counter Fraud Service

The Local Counter Fraud Specialist (LCFS) for NHS Central Lancashire is Deborah Carr. Deborah is available on 01772 644537 or Deborah.carr@centrallancashire.nhs.uk Additional support and advice is provided via NHS Protect Regional Office which is based in St.Helens. A further role of the Regional Office is the management of the NHS Case Management System. The LCFS enters all investigations into this system, which serves as a management and intelligence database.

Interesting and topical fraud cases are published on the NHS Counter Fraud Service website, www.nhsbsa.nhs.uk/fraud, and in the Counter Fraud Service's magazine Insight, which can also be accessed via this website.

3.7 Action Plan

Please refer to Appendix 1.

3.8 Evaluation

To evaluate the success of communications work with the key target audiences of managers and staff a short questionnaire is distributed annually across the Trust. This information is used to highlight areas of opportunity for further counter fraud work to be delivered.

3.9 Protocol for Publicising Specific Cases

Any cases which are taken to court will be brought to the attention of the local media, through press releases highlighting the work of the counter fraud staff and, where appropriate, the role of any members of staff, patients or the public in bringing the fraud to light.

The following guidelines will be observed:

- No individual involved in bringing the fraud to light or providing evidence will be identified without their express consent
- All press releases will be checked at draft stage with any partner agencies involved (e.g. Police, other NHS body)
- Press releases must be approved by both the Director of Finance and the Counter Fraud Service before issuing

4 REFERENCE DOCUMENTS

This document should be read in conjunction with the NHS Central Lancashire's Whistle Blowing Policy, which sets out the principles by which the Primary Care Trust responds to concerns raised by staff, and the Fraud and Corruption Policy, which sets out the processes for raising concerns.

5 GLOSSARY

None

Appendix 1

Action	Target Audiences	Timing	Responsibility
Distribution of fresh posters to staff and public noticeboards	NHS Central Lancashire staff/patients	Annual	Deborah Carr (LCFS)
Article in staff newsletter	NHS Central Lancashire staff	Three articles per year	Deborah Carr (LCFS)./ Communications Manager
Fraud awareness sessions to be delivered at induction	New NHS Central Lancashire staff	Every induction	Deborah Carr (LCFS)
Fraud awareness sessions to be delivered at Mandatory Risk Training sessions	Existing NHS Central Lancashire staff	When required	Deborah Carr (LCFS)
Information on Payslips	NHS Central Lancashire staff	Annual	Deborah Carr (LCFS)/ Payroll Provider
Reports to Audit Committee	Committee members and Primary Care Trust Board	At each Audit Committee meeting.	Deborah Carr (LCFS)
Updated Information on Primary Care Trust Website	All	When required	Deborah Carr (LCFS)
Reports to Regional NHS Protect	RCFS	As investigations arise.	Deborah Carr (LCFS)
Publicity about individual cases	Members of the public	As cases occur	Deborah Carr (LCFS)/DOF/ Communications Mgr