

# ANTI FRAUD AND CORRUPTION POLICY

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**NHS Central Lancashire is committed to ensuring that, as far as it is reasonably practicable, the way we provide services to the public and the way we treat our staff reflects their individual needs and does not discriminate against individuals or groups on the basis of their age, disability, gender, race, religion/belief or sexual orientation.**

**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.**

**This policy is individual to NHS Central Lancashire. NHS Central Lancashire does not accept any liability to any third party that adopts or amends this policy.**

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# 1 INTRODUCTION

NHS Central Lancashire is committed to reducing the level of fraud, corruption and bribery within the NHS to an absolute minimum and keeping it at that level, freeing up public resources for better patient care. This policy has been produced by the Local Counter Fraud Specialist (LCFS), Deborah Carr and is intended as a guide for all employees on counter fraud work within the NHS. All genuine suspicions of fraud, corruption and bribery can be reported to Deborah Carr on 01772 644537 or [Deborah.carr@centrallancashire.nhs.uk](mailto:Deborah.carr@centrallancashire.nhs.uk) or through the NHS Fraud and Corruption Reporting Line (FCRL) on freephone 0800 028 40 60 or online via [www.reportnhsfraud.nhs.uk](http://www.reportnhsfraud.nhs.uk)

## 1.1 Principles

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.

NHS Central Lancashire does not tolerate fraud and corruption within the NHS. The aim is to eliminate all NHS fraud and corruption as far as possible.

### Generic areas of action

NHS Central Lancashire is committed to taking all necessary steps to counter fraud and corruption. To meet its objectives, it has adopted the seven-stage approach developed by the NHS Counter Fraud Service:

- 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 corruption, and
- effective methods of seeking **redress** in respect of money defrauded.

### Aims

This policy relates to all forms of fraud and corruption and is intended to provide direction and help to employees who may identify suspected fraud. It provides a framework for responding to suspicions of fraud, advice and information on various aspects of fraud and implications of an investigation. It is not intended to provide a comprehensive approach to preventing and detecting fraud and corruption.

## 1.2 Scope

This policy applies to all employees of NHS Central Lancashire, regardless of position held, as well as consultants, vendors, contractors, and/or any other parties who have a business relationship with NHS Central Lancashire. It will be brought to the attention of all employees and form part of the induction process for new staff.

## **DEFINITIONS**

### **Fraud**

The Fraud Act 2006 represents an entirely new way of investigating fraud. It is no longer necessary to prove that a person has been deceived. The focus is now on the dishonest behaviour of the suspect and their intent to make a gain or cause a loss.

The new offence of fraud can be committed in three ways:

- 1) Fraud by false representation (s.2) – lying about something using any means, e.g. by words or actions
- 2) Fraud by failing to disclose (s.3) – not saying something when you have a legal duty to do so
- 3) Fraud by abuse of a position of trust (s.4) – abusing a position where there is an expectation to safeguard the financial interests of another person or organisation.

It should be noted that all offences under the Fraud Act 2006 occur where the act or omission is committed dishonestly and with intent to cause gain or loss. The gain or loss does not have to succeed, so long as the intent is there.

### **Corruption**

This can be broadly defined as the offering or acceptance of inducements, gifts, favours, payment or benefit-in-kind which may influence the action of any person. Corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

Corruption prosecutions tend to be most commonly brought using specific pieces of legislation dealing with corruption, i.e. under the following:

- the Public Bodies Corrupt Practices Act 1889
- the Prevention of Corruption Acts 1889–1916
- the Anti-terrorism, Crime and Security Act 2001.

### **Bribery**

The Bribery Act 2010 came into force on 1 July 2011. The Act introduces the following new bribery offences:-

- to give, promise or offer a bribe
- to request, agree to receive or accept a bribe, either in the UK or overseas
- a corporate offence of failure to prevent bribery by persons working on behalf of an organisation.

### **Employees**

For the purposes of this policy, 'employees' includes NHS CFS and NHS Central Lancashire staff, as well as board, executive and non-executive members (including co-opted members) and honorary members.

### **Codes of Conduct**

The codes of conduct for NHS boards and NHS managers set out the key public service values. They state that high standards of corporate and personal conduct, based on the recognition that patients come first, have been a requirement throughout the NHS since its inception. These values are summarised as:

Accountability	Everything done by those who work in the authority must be able to stand the tests of parliamentary scrutiny, public judgements on propriety and professional codes of conduct.
Probity	Absolute honesty and integrity should be exercised in dealing with NHS patients, assets, staff, suppliers and customers.
Openness	The health body's activities should be sufficiently public and transparent to promote confidence between the authority and its staff and the public.

All staff should be aware of and act in accordance with these values.

## **2 ANTI FRAUD AND CORRUPTION POLICY**

### **2.1 Roles and Responsibilities**

Through our day-to-day work, we are in the best position to recognise any specific risks within our own areas of responsibility. We also have a duty to ensure that those risks – however large or small – are identified and eliminated. Where you believe the opportunity for fraud exists, whether because of poor procedures or oversight, you should report it to Deborah Carr (LCFS) on 01257 256256 or [Deborah.carr@centrallancashire.nhs.uk](mailto:Deborah.carr@centrallancashire.nhs.uk) or the NHS Fraud and Corruption Reporting Line 0800 028 40 60 or online at [www.reportnhsfraud.nhs.uk](http://www.reportnhsfraud.nhs.uk)

This section states the roles and responsibilities of employees and other relevant parties in reporting fraud or other irregularities.

#### **Role of NHS Central Lancashire**

NHS Central Lancashire also has a duty to ensure that it provides a secure environment in which to work, and one where people are confident to raise concerns without worrying that it will reflect badly on them. This extends to ensuring that staff feel protected when carrying out their official duties and are not placed in a vulnerable position. If staff have concerns about any procedures or processes that they are asked to be involved in, NHS Central Lancashire has a duty to ensure that those concerns are listened to and addressed.

NHS Central Lancashire will implement the seven generic areas of counter fraud action outlined below. A key element in achieving this is the appointment of the LCFS.

**The creation of an anti-fraud culture**

NHS Central Lancashire will use counter fraud publicity material to persuade those who work within the Trust that fraud and corruption is serious and takes away resources from important services. Such activity will demonstrate that fraud and corruption is not acceptable and is being tackled.

**Maximum deterrence of fraud**

Deterrence is about increasing the expectation that someone will be caught if they attempt to defraud – this is more than just tough sanctions. NHS Central Lancashire will introduce such measures to minimise the occurrence of fraud and corruption.

**Successful prevention of fraud which cannot be deterred**

NHS Central Lancashire has policies and procedures in place to reduce the likelihood of fraud and corruption occurring. These include a system of internal controls,

Standing Financial Instructions and documented procedures, which involve physical and supervisory checks, financial reconciliations, segregation and rotation of duties, and clear statements of roles and responsibilities. Where fraud and corruption has occurred, NHS Central Lancashire will ensure that any necessary changes to systems and procedures take place immediately to prevent similar incidents from happening in the future.

**Prompt detection of fraud which cannot be prevented**

NHS Central Lancashire will develop and maintain effective controls to prevent fraud and corruption and to ensure that if it does occur, it will be detected promptly and referred to the LCFS for investigation.

**Professional investigation of detected fraud**

The LCFS will be professionally trained and accredited to carry out investigations into suspicions of fraud and corruption to the highest standards. In liaison with the NHS CFS, the LCFS will professionally investigate all suspicions of fraud and corruption to prove or disprove the allegation.

**Effective sanctions, including appropriate legal action against people committing fraud and corruption**

Following the conclusion of an investigation, if there is evidence of fraud, available sanctions will be considered in accordance with the guidance issued by the NHS CFS – ‘Applying Appropriate Sanctions Consistently’. This may include criminal prosecution, civil proceedings and disciplinary action, as well as referral to a professional or regulatory body.

**Effective methods for seeking redress in respect of money defrauded**

Recovery of any losses incurred will also be sought through civil proceedings if appropriate, to ensure losses to NHS Central Lancashire and the NHS are returned for their proper use.

## 2.2 Employees

NHS Central Lancashire's Standing Orders, Standing Financial Instructions, policies and procedures place an obligation on all employees and non-executive directors to act in accordance with best practice.

Employees are expected to act in accordance with the standards laid down by their professional institutes, where applicable, and have a personal responsibility to ensure that they are familiar with them.

Employees also have a duty to protect the assets of NHS Central Lancashire, including information, goodwill and property.

In addition, all employees have a responsibility to 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. This means, in addition to maintaining the normal standards of personal honesty and integrity, all employees should always:

- avoid acting in any way that might cause others to allege or suspect them of dishonesty
- behave in a way that would not give cause for others to doubt that NHS Central Lancashire's employees deal fairly and impartially with official matters
- be alert to the possibility that others might be attempting to deceive.

All employees have a duty to ensure that public funds are safeguarded, whether or not they are involved with cash or payment systems, receipts or dealing with contractors or suppliers.

As the Bribery Act 2010 became law in 1 July 2011, employees are reminded all gifts, sponsorship and hospitality must be declared to the Trust Secretary. Reasonable and proportionate hospitality is not prohibited by the Act.

If an employee suspects that there has been fraud, corruption or bribery, or has seen any suspicious acts or events, they must report the matter to Deborah Carr the nominated LCFS.

## 2.3 Managers

Managers must be vigilant and 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 and corruption. If they have any doubts, they must seek advice from the nominated LCFS.

Managers must instil and encourage an anti-fraud and 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.

All instances of actual or suspected fraud, corruption or bribery which come to the attention of a manager must be reported immediately. 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.

Line managers at all levels have a responsibility to 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 and corruption therefore primarily rests with managers but requires the co-operation of all employees.

## 2.4 LCFS

The Directions to NHS Bodies on Counter Fraud Measures 2004 require NHS Central Lancashire to appoint and nominate an LCFS. The LCFS's role is to ensure that all cases of actual or suspected fraud and corruption are notified to the Director of Finance and reported accordingly.

The LCFS will regularly report to the Director of Finance on the progress of the investigation and when/if referral to the police is required.

The LCFS will:

- ensure that the director of finance is informed about all referrals/cases
- be responsible for the day-to-day implementation of the seven generic areas of counter fraud and corruption activity and, in particular, the investigation of all suspicions of fraud
- investigate all cases of fraud
- in consultation with the director of finance, report any case to the police or NHS CFS as agreed and in accordance with the *NHS Counter Fraud and Corruption Manual*
- report any case and the outcome of the investigation through the NHS CFS's national case management system (CMS)
- ensure 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
- ensure that NHS Central Lancashire's incident and losses reporting systems are followed
- ensure that any system weaknesses identified as part of an investigation are followed up with management and reported to internal audit
- adhere to the Counter Fraud Professional Accreditation Board (CFPAB)'s Principles of Professional Conduct as set out in the *NHS Counter Fraud and Corruption Manual*
- not have responsibility for or be in any way engaged in the management of security for any NHS body
- ensure that the director of finance is informed of regional team investigations, including progress updates.

## **2.5 Operational fraud managers (OFMs)**

Each operational fraud manager works as part of the NHS Protect, whose key objective is to combat fraud and corruption in the National Health Service

## **2.6 Director of Finance**

The director of finance, in conjunction with the chief executive, monitors and ensures compliance with Secretary of State Directions regarding fraud and corruption.

The director of finance will, depending on the outcome of investigations (whether on an interim/ongoing or concluding basis) and/or the potential significance of suspicions that have been raised, inform appropriate senior management accordingly.

The LCFS shall be responsible, in discussion with the director of finance, for informing third parties such as external audit or the police at the earliest opportunity, as circumstances dictate.

The director of finance will inform and consult the chief executive in cases where the loss may be above the agreed limit or where the incident may lead to adverse publicity.

The director of finance will delegate to NHS Central Lancashire's LCFS, who has responsibility for leading the investigation, whilst retaining overall responsibility him/herself.

The director of finance or the LCFS will consult and take advice from the head of HR if a member of staff is to be interviewed or disciplined. The director of finance or LCFS will not conduct a disciplinary investigation, but the employee may be the subject of a separate investigation by HR.

## **2.7 Internal and external audit**

Any incident or suspicion that comes to internal or external audit's attention will be passed immediately to the nominated LCFS. The outcome of the investigation may necessitate further work by internal or external audit to review systems.

## **2.8 Human resources**

HR will liaise closely with managers and the LCFS from the outset if an employee is suspected of being involved in fraud and/or corruption, in accordance with agreed liaison protocols. HR staff are responsible for ensuring the appropriate use of NHS Central Lancashire's disciplinary procedure. The HR department will advise 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 HR will be essential to ensure that any parallel sanctions (i.e. criminal, civil and disciplinary sanctions) are applied effectively and in a coordinated manner.

HR will take steps at the recruitment stage 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 are treated in the same manner as permanent employees.

## **2.9 Information management and technology**

The head of information security (or equivalent) will contact the LCFS immediately in all cases where there is suspicion that IT is being used for fraudulent purposes. HR will also be informed if there is a suspicion that an employee is involved.

# **3 IMPLEMENTATION**

## **3.1 The Response Plan Reporting fraud or corruption**

This section outlines the action to be taken if fraud or corruption is discovered or suspected.

If an employee has any of the concerns mentioned in this document, they must inform the nominated LCFS or NHS Central Lancashire's director of finance immediately, unless the director of finance 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.

**Form 1** provides a reminder of the key contacts and a checklist of the actions to follow if fraud and corruption, or other illegal acts, are discovered or suspected. Managers are encouraged to copy this to staff and to place it on staff notice boards in their department. An employee can contact any executive or non-executive director of NHS Central Lancashire to discuss their concerns if they feel unable, for any reason, to report the matter to the LCFS or director of finance.

Employees can also call the NHS Fraud and Corruption Reporting Line on freephone 0800 028 40 60. This provides an easily accessible route for the reporting of genuine suspicions of fraud within or affecting the NHS. It allows NHS staff who are unsure of internal reporting procedures to report their concerns in the strictest confidence. All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.

Anonymous letters, telephone calls, etc are occasionally received from individuals who wish to raise matters of concern, but not through official channels. While the suspicions may be erroneous or unsubstantiated, they may also reflect a genuine cause for concern and will always be taken seriously.

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.

Staff should always be encouraged to report reasonably held suspicions directly to the LCFS. You can do this by filling in the NHS Fraud and Corruption Referral Form (**form 2**) or by contacting the LCFS by telephone or email using the contact details supplied on **form 1**.

NHS Central Lancashire wants all employees to feel confident that they can expose any wrongdoing without any risk to themselves. In accordance with the provisions of the Public Interest Disclosure Act 1998, NHS Central Lancashire has produced a whistleblowing policy. This procedure is intended to complement NHS Central Lancashire's counter fraud and corruption policy and code of business conduct and ensures there is full provision for staff to raise any concerns with others if they do not feel able to raise them with their line manager/management chain. It can be found on the Trust's intranet.

### **Disciplinary action**

The disciplinary procedures of NHS Central Lancashire must be followed if an employee is suspected of being involved in a fraudulent or otherwise illegal act.

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.

### **Police involvement**

In accordance with the *NHS Counter Fraud and Corruption Manual*, the director of finance, 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 NHS Central Lancashire.

### **Managing the investigation**

The LCFS, in consultation with NHS Central Lancashire's director of finance, will investigate an allegation in accordance with procedures documented in the *NHS Counter Fraud and Corruption Manual* issued by the NHS CFS.

The LCFS must be aware that staff under an investigation that could lead to disciplinary action have the right to be represented at all stages. 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.

The trust will follow its disciplinary procedure if there is evidence that an employee has committed an act of fraud or corruption.

### **Gathering evidence**

The LCFS will take control of any physical evidence, and record this in accordance with the procedures outlined in the *NHS Counter Fraud and Corruption Manual*.

Interviews under caution or to gather evidence will only be carried out by the LCFS, if appropriate, or the investigating police officer in accordance with the Police and Criminal Evidence Act 1984 (PACE). The LCFS will take written statements where necessary.

### **3.2 Recovery of losses incurred to fraud and corruption**

The seeking of financial redress or recovery of losses should always be considered in cases of fraud or corruption that are investigated by either the LCFS or NHS CFS where a loss is identified. As a general rule, recovery of the loss caused by the perpetrator should always be sought. The decisions must be taken in the light of the particular circumstances of each case.

Redress allows resources that are lost to fraud and corruption to be returned to the NHS for use as intended, for provision of high-quality patient care and services

### **3.3 Reporting the results of the investigation**

The investigation process requires the LCFS to review the systems in operation to determine whether there are any inherent weaknesses. Any such weaknesses identified should be corrected immediately.

If fraud or corruption is found to have occurred, the LCFS should prepare a report for the director of finance and the next NHS Central Lancashire audit committee meeting, setting out the following details:

- the circumstances
- the investigation process
- the estimated loss
- the steps taken to prevent a recurrence
- the steps taken to recover the loss.

This report should also be available to NHS Central Lancashire's Trust board.

### **3.4 Action to be taken**

Sections 10 and 11 of the *NHS Counter Fraud and Corruption Manual* provide in-depth details of how sanctions can be applied where fraud and corruption is proven and how redress can be sought. To summarise, local action can be taken to recover money by using the administrative procedures of NHS Central Lancashire or the civil law.

Criminal investigations are primarily used for dealing with any criminal activity. The main purpose is to determine if activity was undertaken with criminal intent. Following such an investigation, it may be necessary to bring this

activity to the attention of the criminal courts (magistrates' court and Crown court). Depending on the extent of the loss and the proceedings in the case, it may be suitable for the recovery of losses to be considered under the Proceeds of Crime Act 2002 (POCA).

The civil recovery route is also available to NHS Central Lancashire if this is cost-effective and desirable for deterrence purposes. This could involve a number of options such as applying through the Small Claims Court and/or recovery through debt collection agencies. Each case needs to be discussed with the director of finance to determine the most appropriate action.

The appropriate senior manager, in conjunction with the HR department, will be responsible for initiating any necessary disciplinary action. Arrangements may be made to recover losses via payroll if the subject is still employed by NHS Central Lancashire. In all cases, current legislation must be complied with.

In some cases (taking into consideration all the facts of a case), it may be that NHS Central Lancashire, under guidance from the LCFS and with the approval of the director of finance, decides that no further recovery action is taken.

### **3.5 Timescales**

Action to recover losses should be commenced as soon as practicable after the loss has been identified. Given the various options open to the trust, it may be necessary for various departments to liaise about the most appropriate option.

### **3.6 Recording**

In order to provide assurance that policies were adhered to, the director of finance will maintain a record highlighting when recovery action was required and issued and when the action taken. This will be reviewed and updated on a regular basis.

### **3.7 Further Reading**

[www.nhsbsa.nhs.uk/fraud](http://www.nhsbsa.nhs.uk/fraud)

## **4 REFERENCE DOCUMENT**

None

## **5 GLOSSARY**

None

## APPENDIX 1

*NHS fraud and corruption: dos and don'ts  
A desktop guide for NHS Central Lancashire*

**FRAUD** is the dishonest intent to obtain a financial gain from, or cause a financial loss to, a person or party through false representation, failing to disclose information or abuse of position.

**CORRUPTION** is the deliberate use of bribery or payment of benefit-in-kind to influence an individual to use their position in an unreasonable way to help gain advantage for another.

### DO

- **note your concerns**

Record details such as your concerns, names, dates, times, details of conversations and possible witnesses. Time, date and sign your notes.

- **retain evidence**

Retain any evidence that may be destroyed, or make a note and advise your LCFS.

- **report your suspicion**

Confidentiality will be respected – delays may lead to further financial loss.

Complete a fraud report and submit in a sealed envelope marked 'Restricted – Management' and 'Confidential' for the personal attention of the LCFS.

If you suspect that fraud against the NHS has taken place, you must report it immediately, by:

- directly contacting the **Local Counter Fraud Specialist**, or
- telephoning the **freephone NHS Fraud and Corruption Reporting Line**, or
- contacting the **Director of Finance**.

### DO NOT

- **confront the suspect or convey concerns to anyone other than those authorised, as listed below**

Never attempt to question a suspect yourself; this could alert a fraudster or accuse an innocent person.

- **try to investigate, or contact the police directly**

Never attempt to gather evidence yourself unless it is about to be destroyed; gathering evidence must take into account legal procedures in order for it to be useful. Your LCFS can conduct an investigation in accordance with legislation.

- **be afraid of raising your concerns**

The Public Interest Disclosure Act 1998 protects employees who have reasonable concerns. You will not suffer discrimination or victimisation by following the correct procedures.

### Do you have concerns about a fraud taking place in the NHS?

If so, any information can be passed to the  
**NHS Fraud and Corruption Reporting Line: 0800 028 40 60**  
 All calls will be treated in confidence and investigated  
 by professionally trained staff

Your nominated Local Counter Fraud Specialist is **Deborah Carr**, who can be contacted by telephoning **01257 256256**, or emailing [deborah.carr@anw.nhs.uk](mailto:deborah.carr@anw.nhs.uk)

If you would like further information about the NHS Counter Fraud Service, please visit [www.nhsbsa.nhs.uk/fraud](http://www.nhsbsa.nhs.uk/fraud)

*Protecting your NHS*

**APPENDIX 2**

**NHS Central Lancashire fraud and corruption referral form**

*All referrals will be treated in confidence and investigated by professionally trained staff*

**Note:** *Referrals should only be made when you can substantiate your suspicions with one or more reliable pieces of information. Anonymous applications are accepted but may delay any investigation.*

**1. Date**

**2. Anonymous application**

*Yes (If 'Yes' go to section 6) or No (If 'No' complete sections 3–5)*

**3. Your name**

**4. Your organisation/profession**

**5. Your contact details**

**6. Suspicion**

**7. Please provide details including the name, address and date of birth (if known) of the person to whom the allegation relates.**

**8. Possible useful contacts**

**9. Please attach any available additional information.**

Submit the completed form (in a sealed envelope marked **Private and Confidential** for the personal attention of Deborah Carr, Audit North West, Wrightington Conference Centre, Wrightington Hospital, Appley Bridge, Wigan WN6 9EP. Under no circumstances should this report, which contains personal details, be transmit