

Fraud, Bribery & Corruption Policy

Issue Date	Review Date	Version
July 2021	July 2022	12

Purpose

This document is the Trust's policy on dealing with fraud and other illegal acts involving dishonesty or bribery/corruption. It includes a brief statement to all employees setting out the organisation's position on dealing with fraud and what employees should do if they suspect fraud and/or bribery/corruption.

Who should read this document?

All staff, contractors, consultants, vendors and other internal and external stakeholders.

Key Messages

A basic principle of public sector organisations is the proper use of public funds. This policy is to ensure that all Trust employees are aware of the risk of fraud and bribery/corruption and provides guidance for detected or suspected fraud and corruption.

Core accountabilities

Owner	Tracy Wheeler, Local Counter Fraud Specialist
Review	Audit Committee
Ratification	Director of Finance – Sarah Brampton
Dissemination (Raising Awareness)	All staff via Staffnet
Compliance	Audit Committee

Links to other policies and procedures

Raising Concerns Policy & Speaking up leaflet
 Performance and Conduct policy
 Standards of Business Conduct policy
 NHS England Managing Conflicts of Interest guidance

Version History

6	December 2009	Approved by Audit Committee November 2008
7	March 2011	Reviewed by Local Counter Fraud Specialist
8	July 2014	Reviewed by Local Counter Fraud Specialist
9	June 2016	Reviewed by Local Counter Fraud Specialist
10	July 2018	Reviewed by Local Counter Fraud Specialist

11	July 2019	Reviewed by Local Counter Fraud Specialist
12	July 2021	Reviewed by Local Counter Fraud Specialist

The Trust is committed to creating a fully inclusive and accessible service. Making equality and diversity an integral part of the business will enable us to enhance the services we deliver and better meet the needs of patients and staff. We will treat people with dignity and respect, promote equality and diversity and eliminate all forms of discrimination, regardless of (but not limited to) age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage/civil partnership and pregnancy/maternity.

**An electronic version of this document is available on Trust Documents.
Larger text, Braille and Audio versions can be made available upon
request.**

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1 Introduction

One of the basic principles of public sector organisations is the proper use of public funds. It is therefore important that all Trust employees, contractors, consultants, vendors and other internal and external stakeholders are aware of the risk of and means of enforcing the rules against any acts involving dishonesty, such as over claiming of travel expenses/hours worked, bribery/corruption or abuse of position. This document sets out the Trust's policy for detected or suspected fraud and bribery/corruption.

The Trust is committed to preventing and reducing fraud, bribery and corruption in the NHS and will seek the appropriate disciplinary, regulatory, civil and criminal sanctions against fraudsters and where possible will attempt to recover losses.

The Board already has procedures in place that reduce the likelihood of fraud occurring. These include Standing Orders, Standing Financial Instructions, a system of internal control and a system of risk assessment.

The Trust's expectation on propriety and accountability is that board members and staff at all levels will lead by example in ensuring adherence to rules. Given that we are handling public resources, all procedures and practices should be above reproach.

Fraud in the NHS can impact on patient care and confidentiality.

It is everyone's responsibility to prevent fraud, bribery and corruption and know how to report concerns.

This document is intended to provide direction and help to all employees who have suspicions or become aware of fraud and/or bribery/corruption. It is supported and endorsed by senior management.

2 Purpose

Service Condition 24 of the NHS Standard Contract details the counter fraud standards for providers of NHS services (which includes University Hospitals Plymouth NHS Trust) must have in place.

Those working for University Hospitals Plymouth NHS Trust need to be aware of the public sector values and the Trust's commitment to maintaining a honest, open and well intentioned culture within the Trust.

The Trust's Policy - The Board is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the Trust. It is therefore also committed to the elimination of any fraud within the Trust, and to the rigorous investigation of any such cases.

The Board wishes to encourage anyone with reasonable suspicions of fraud to report them. The Board will ensure that no employee will suffer in any way as a result of reporting reasonably held suspicions. "Reasonably held suspicions" are any suspicions other than those which are both raised maliciously and also found to be groundless. Malicious allegations may be dealt with as a disciplinary matter.

The Trust's staff are an important element in our stance on fraud and corruption. All staff are positively encouraged to raise any concerns that they may have on these issues where they are associated with the Trust's activity. All such concerns will be treated in confidence, wherever possible, and properly investigated.

The Trust will not tolerate any harassment, victimisation or other disadvantage – including disciplinary action – of employees who raise concerns in good faith which are subsequently shown to be unfounded.

3 Definitions

Public Sector Values:

The three fundamental public service values underpinning the work of the NHS and all public sector work, specified by the NHS Code of Conduct for Boards are:

Accountability Everything done by those who work in the organisation must be able to stand the tests of parliamentary scrutiny, public judgments 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 organisation's activities should be sufficiently public and transparent to promote confidence between the organisation and its patients, staff and the public.

All those who work in the public sector should be aware of, and act in accordance with, these values. The core standards of conduct of NHS managers are set out in the Code of Conduct for NHS Managers and for all NHS staff NHS England issued in June 2017 the Managing Conflicts of Interest in the NHS guidance <https://www.england.nhs.uk/publication/managing-conflicts-of-interest-in-the-nhs-guidance-for-staff-and-organisations/> .

Fraud Act 2006:

The Act gives a statutory definition of the criminal offence of fraud, defining it in three classes - fraud by false representation, fraud by failing to disclose information, and fraud by abuse of position.

These offences occur when the act or omission is committed dishonestly and with the intention of making a financial gain or causing a financial loss. The gain or loss does not have to succeed, so long as the intent is there.

Some Fraud Act 2006 offences:

- Section 2 – **fraud by false representation** – lying about something using any means eg by words or actions
- Section 3 – **fraud by failing to disclose** – not saying something when you have a legal duty to do so eg failing to declare criminal convictions

- Section 4 – **fraud by abuse of position** – abusing a position where there is an expectation to safeguard the financial interests of another person or organisation
- Section 7 – **making or supplying articles for the use in fraud** eg false references
- Section 11 – **obtaining services dishonestly**

Examples of NHS fraud:

- Abuse of Trust property
- False qualifications and references
- Deception or falsification of records such as fraudulent time or expense claims
- Corruption concerning procurement or tendering
- Incorrectly claiming reimbursement
- Charging for goods and services not actually delivered
- Misuse of sick leave ie working elsewhere
- Falsified cash accounting records ie petty cash vouchers, patients money
- False pharmaceutical/ophthalmic/dental claims

Bribery Act 2010:

Bribery/Corruption is defined as the offering, promising or giving a payment of benefit-in-kind in order to influence others to use their position in an improper way to gain an advantage.

The Bribery Act 2010 makes it an offence to give, promise or offer a bribe, and to request, agree to receive or accept a bribe. The Act also introduces a corporate offence of failing to prevent bribery by an organisation. An organisation may avoid conviction if it can show that it had procedures/protocols in place to prevent bribery. NHS organisations are liable under this Act.

If Trust employees, contractors or temporary staff have any personal or business interest in an organisation which contracts with University Hospitals Plymouth NHS Trust then they are required to declare it at plh-tr.interests@nhs.net

All staff must take great care over offering or accepting gifts, hospitality, entertainment or sponsorship. To ensure protection against any accusation of compromise then a declaration must be made to plh-tr.hospitality@nhs.net

Further information on expected conduct of all NHS staff can be found in the Trust's Standards of Business Conduct Policy and the NHS England Managing Conflicts of Interest in the NHS guidance.

Theft Act 1968

Theft is defined as dishonestly appropriating property belonging to another with the intention of permanently depriving them of it (ie stealing). Fraud is distinct from theft because it involves an element of deception – making a false representation. All instances of theft within the Trust should be referred to the Trust’s Security Management.

Computer Misuse Act 1990

The Computer Misuse Act is designed to protect computer users and organisations against intentional misuse, attack and/or theft of information. The Act introduced three main criminal offences:

- Unauthorised access to computer material (Section 1).
- Unauthorised access with intent to commit or facilitate commission of further offences (Section 2).
- Unauthorised modification of computer material (Section 3).

The maximum penalties for computer misuse offences are 10 years’ imprisonment and a fine.

NHS Counter Fraud Authority (NHSCFA)

The NHSCFA has the responsibility for the detection, investigation and prevention of fraud and economic crime within the NHS. Its aim is to lead the fight against fraud affecting the NHS and wider health service, by using intelligence to understand the nature of fraud risks, investigate serious and complex fraud, reduce its impact and drive forward improvements.

The NHSCFA is a special health authority which is independent from NHS bodies and is directly accountable to the Department of Health & Social Care (DHSC).

The NHSCFA strategy 2020-2023 and business plan 2021-22 is available at https://cfa.nhs.uk/resources/downloads/documents/corporate-publications/NHSCFA_Strategy_2020-23.pdf. This follows the publication of the DHSC’s 2020-2023 counter fraud strategy, which sets out the department’s plan to prevent and tackle fraud across the healthcare system.

Crimes against the NHS seriously undermine its effectiveness and ability to deliver the best quality of healthcare and patient experience. By tackling crime across the health service, it helps to achieve the best use of NHS resources.

Counter fraud standards¹

A requirement in the NHS standard contract is that providers of NHS services (that hold a Monitor’s Licence or is an NHS Trust) must take the necessary action to comply with the NHSCFA’s counter fraud requirements. Others should have due regard to the standards. The contract places a requirement on providers to have policies,

¹ <https://cfa.nhs.uk/government-functional-standard>

procedures and processes in place to combat fraud, corruption and bribery to ensure compliance with the standards. The NHSCFA carries out regular assessments of health organisations in line with the Government Functional Standard GovS013: Counter Fraud.

4 Duties & Responsibilities

The Chief Executive

The Chief Executive as the Trust's accountable officer, has the overall responsibility for funds entrusted to it. This includes instances of fraud, bribery and corruption. The Chief Executive must ensure adequate policies and procedures are in place to protect the organisation and funds it receives. They will keep the Board informed of the progress of any investigation as necessary.

Role of the Board

The Board are responsible for:

- Providing clear, demonstrable support and strategic direction for counter fraud, bribery and corruption work.
- Proactively managing, controlling and evaluating counter fraud, bribery and corruption work.
- Scrutinising NHSCFA assessment reports and where applicable ensures recommendations are actioned.

Director of Finance

The Director of Finance has responsibility for:

- Approving financial transactions initiated by directorates across the organisation.
- Preparation and maintenance of detailed financial procedures and systems applying principles of segregation of duties and internal checks.
- Reporting to the Board on the adequacy of internal financial controls and risk management as part of the Board's overall responsibility to prepare a statement of internal controls for the annual report.
- Ensuring that the Trust complies with the requirements of Service Condition 24 of the NHS Standard Contract.
- Overseeing the Trust's counter fraud arrangements.
- Informing third parties such as External Auditors of any significant cases when appropriate.

Audit Committee

The Audit Committee is responsible for reviewing, approving and monitoring counter fraud workplan, receiving regular updates on counter fraud activity and providing direct access and liaison with those responsible for counter fraud and discussing NHSCFA quality assessment reports. They should ensure that the organisation has adequate arrangements in place for countering fraud and review the outcomes of counter fraud work. The NHS Audit Committee Handbook 2018 (published by the HFMA) details the responsibilities of the Audit Committee and how counter fraud activity supports the Audit Committee's work (section 5.6). <https://www.hfma.org.uk/publications/details/nhs-audit-committee-handbook>

Director of People

The Director of People will be responsible for ensuring that employment law and the Trust's policies and procedures are complied with throughout the investigation. Their role impacts on the application of parallel sanctions at the start of an investigation.

Human Resources

Human Resources (HR) has a key role in relation to suspected cases of fraud, bribery and corruption, including liaison with the Local Counter Fraud Specialist and the conduct of any investigation, and instigating the necessary disciplinary action against those who fail to comply with the policies, procedures and processes.

HR should also be aware of the guidance outlined in the Pursuing Sanctions section of the NHSCFA fraud manual; seeking to apply sanctions where fraud, bribery or corruption is proven.

Fraud Champion

The NHSCFA introduced the Fraud Champion's role to help form part of the NHS organisation's counter fraud provision and meet the requirements of the Government's Counter Fraud Functional Standard which was introduced across the NHS in 2020-21.

The Fraud Champion is a nominated role and should be held by a person who is senior and directly employed by the organisation and has enough influence to raise awareness of fraud.

Fraud Champions will support and promote the fight against fraud at a strategic level and with other colleagues in their own organisation. Fraud Champions will support the Local Counter Fraud Specialist in the work they already do.

The role and duties of the Fraud Champion includes:

- Promote awareness of fraud, bribery and corruption within your organisation
- Understand the threat posed by fraud, bribery and corruption, and
- Understand best practice on counter fraud.

Information management and technology

IM&T have a duty to manage systems and hardware in accordance with the Computer Misuse Act 1990.

- Any fraudulent use of information technology should be reported by the head of information security (or equivalent) to the Local Counter Fraud Specialist.

Local Counter Fraud Specialist (LCFS)

The LCFS is responsible for taking forward all counter fraud work locally in accordance with national standards and reports directly to the Director of Finance and the Audit Committee. They are responsible for ensuring all local counter fraud work is conducted in a professional comprehensive and ethical manner following guidance in the NHS Counter Fraud Manual and any other guidance issued by the NHS Counter Fraud Authority.

Adhering to the NHSCFA counter fraud functional standard is important in ensuring that the organisation has appropriate counter fraud, bribery and corruption arrangements in place.

The LCFS will work with key colleagues and stakeholders to promote counter fraud work, apply effective preventative measures and investigate allegations of fraud and/or corruption.

The LCFS can be approached confidentially and anonymously by any Trust employee or member of the public who has suspicions of fraud within the Trust.

Internal and external audit

The role of internal and external audit includes reviewing controls and systems and ensuring compliance with financial instructions. They have a duty to pass on any suspicions of fraud, bribery or corruption to the LCFS.

Managers

All managers are responsible for:

- ensuring that policies, procedures and processes within their local area are adhered to and kept under constant review.
- That staff are aware of fraud, bribery and corruption and understand the importance of protecting the organisation from it.
- Be responsible for the enforcement of disciplinary action for staff who do not comply with policies, procedures and processes.
- Be alert to the possibility that unusual events or transactions could be indications of fraud.
- Seeking advice from the Director of Finance or the LCFS if they have suspicions of fraud.
- Reporting all incidents or suspicions immediately to the Director of Finance or the LCFS and to not investigate the matter themselves.

All Employees

All employees are responsible for:

- Complying with the Trust's policies, procedures and processes and apply best practice in order to prevent fraud, bribery and corruption.
- Being aware of their own responsibilities in accordance with the Trust's Standards of Business Conduct policy and acting in accordance with it. Thus, protecting the organisation and themselves from these crimes.
- Protecting the assets of the Trust, including information and goodwill as well as property.
- Acting in accordance with the standards laid down by their professional bodies where applicable.
- Reporting all incidents or suspicions of fraud, bribery or corruption to the Director of Finance, the LCFS or the NHSCFA.
- Managing internal control systems (if applicable) and should receive adequate training and support in order to carry out their responsibilities.

If an employee suspects fraud, bribery or corruption has taken place, they should ensure it is reported to the LCFS and/or NHSCFA.

5 The Response Plan

Fraud, Bribery and Corruption All fraud, bribery and corruption (collectively referred to as economic crime) in the NHS is unacceptable and should not be tolerated. It affects the ability of the NHS to improve health outcomes for people in England, as resources are wrongfully diverted and cannot be used for their intended purpose. In addition, the Trust's reputation can also be damaged, especially when its staff are involved in economic crime.

The Trust conducts risk assessments in line with Ministry of Justice guidance to assess how bribery and corruption may affect the organisation. Where risks are identified, they are mitigated with proportionate procedures.

All staff must be aware of the Standards of Business Conduct policy and comply with the conditions, in particular the following areas:

- Declarations of interests
- Gifts
- Hospitality

Any declarations of interests, gifts or hospitality offered or received must be declared, if staff are in any doubt they should seek guidance from the Trust's Company Secretary: karen.senior8@nhs.net .

REPORTING FRAUD AND GUIDANCE

Reporting Fraud

If you have reason to suspect a colleague, patient, contractor or other person of fraud or an offence against the Trust or a serious infringement of Trust or NHS rules, you have a responsibility to report this.

Contact your LCFS if you have any suspicions or concerns. All referrals will be treated in the strictest of confidence.

Your LCFS is:

- Tracy Wheeler – 01752 431378 / 0778 986 8568 – tracy.wheeler2@nhs.net
- Third Floor, Elsie Margaret House, William Prance Road, Derriford, Plymouth PL6 5ZD

Alternatively, you can inform the Director of Finance:

- Sarah Brampton – s.brampton@nhs.net

If staff wish to report any suspicions or concerns and feel that it cannot be done internally they can contact the NHS Fraud and Corruption reporting line on 0800 028 40 60 (Freephone 24 hours a day 7 days a week) or via the online fraud reporting form at <https://cfa.nhs.uk/reportfraud>. Please remember to give as much information as possible.

Once contacted the LCFS will ensure that the DoF is notified and based on the information provided agree the best course of action to be taken.

The DoF will liaise with the Director of People to ensure that good practice is adhered to. The following guidance will be followed

- NHSCFA Fraud Manual
- Performance & Conduct Policy
- Raising Concerns Policy

Once fraud is suspected it is critical that any investigation is conducted in a professional manner aimed at ensuring that the current and future interests of both the Trust and the suspected individual(s) are protected. It is important to note that suspicion should not be seen as evidence of guilt. An investigation may be instigated purely to establish the facts.

At no stage should any member of staff speak or write to representatives of the media or any third party about a suspected fraud without the express authority of the Chief Executive.

Any individual raising a genuine concern can request support from the Trust as detailed in the Raising Concerns Policy. Staff should also be aware of the

guidance provided by NHS Improvement and NHS England: Freedom to speak up: raising concern's (whistleblowing) policy for the NHS, April 2016.

If there are any concerns that the LCFS or Director of Finance may be implicated in suspected fraud, bribery or corruption then employees can report them either via the Trust's Freedom to Speak up Guardian, the Chief Executive or the Audit Committee Chair.

Disciplinary Action

Any staff member involved in a fraudulent or illegal act will have disciplinary procedures initiated as described in the Sanctions and Redress section.

Where staff have acted negligently and the negligent action subsequently leads to a fraud being perpetrated, they may also face disciplinary action.

Sanctions and Redress

The Trust is committed to pursuing all appropriate sanctions against those that have committed fraud against the organisation. Where the Trust have incurred a loss they will seek financial redress whenever possible to recover those losses to fraud, bribery and corruption. The redress can take the form of confiscation and compensation orders, a civil order for repayment, or a local agreement between the organisation and the offender to repay monies lost.

There are three main types of sanction the Trust may pursue (more than one sanction may be applied):

- **Criminal** The LCFS works in partnership with the NHSCFA, the police and/or the Crown Prosecution Service to bring a case to court against an alleged offender. Outcomes can range from a criminal conviction to fines and imprisonment.
- **Disciplinary** If an employee is suspected of being involved in a fraudulent or illegal act disciplinary action will be initiated as per the Performance and Conduct Policy.
- **Civil** sanctions that can be taken against those who commit fraud, bribery and/or corruption. They are used to recover money and/or assets which have been fraudulently obtained, including interest and costs.
- **Professional body disciplinary** If warranted, staff may be reported to their professional body as a result of a successful investigation/prosecution.

Recoveries Plan

Where fraud has been identified and loss calculated; the Trust will employ the following actions:

- **Staff payroll recoveries:** deductions may be made from salary payments either as a one off sum or via a payment plan.
- **Post-criminal sanction recoveries:** we will recover losses via compensation awarded as part of the trial or via a Proceeds of Crime Act application.
- **Civil recoveries:** The Trust's cash management team will pursue the loss identified in civil proceedings to the extent of the law including as appropriate a civil court application.

The LCFS will keep records of all outstanding fraud losses. Cash management will provide a quarterly report to the LCFS on all outstanding invoices and payments received. Payroll will provide quarterly reports to the LCFS of any staff that have salary deductions. In this way the LCFS will ensure loss recovery is monitored and maximised.

What should you do if you suspect a fraud?

- **Make an immediate note of your concerns.**

Note all relevant details, such as what was said in telephone or other conversations, the date, time and the names of any parties involved.

- **Convey your suspicions to someone with the appropriate authority and experience.**

Tell the LCFS or the Director of Finance or contact the NHS Fraud & Corruption reporting line 0800 028 40 60 or <https://cfa.nhs.uk/reportfraud>

- **Deal with the matter promptly.**

Any delay could cost the Trust money.
If in doubt, report your suspicions anyway.

- **Do not be afraid of raising your concerns.**

Your concerns will be dealt with in confidence. You will not be ridiculed and will not suffer any recriminations as a result of voicing a reasonably held suspicion. The Trust will treat any matter you raise sensitively and confidentially.

- **Do not accuse any individuals directly.**

- **Do not try to investigate the matter yourself.**

There are special rules surrounding the gathering of evidence for use in criminal cases. Any attempt to gather evidence by people who are unfamiliar with these rules may destroy the case.

- **Do not tell anyone about your suspicions other than those with the proper authority.**

All reported frauds will be investigated and if appropriate the police maybe involved.

- **Be responsive to staff concerns**

The Trust needs to encourage staff to voice any reasonably held suspicion as part of developing an anti-fraud culture. As a manager you should treat all staff concerns seriously and sensitively.

- **Note details**

Note all relevant details. Get as much information as possible from the reporting member of staff. If the staff member has made any notes obtain these also. In addition, note any documentary evidence that may exist to support the allegations made. But do not interfere with this evidence in any way.

- **Evaluate the allegation objectively**

Before you take the matter further, you need to determine whether any suspicions appear to be justified. Be objective when evaluating the issue. Consider the facts as they appear, based on the information you have to hand. Even if in doubt you must report your suspicions immediately.

- **Advise the appropriate person**

Director of Finance – Sarah Brampton s.brampton@nhs.net

LCFS–Tracy Wheeler (01752) 431378/0778 986 8568 or tracy.wheeler2@nhs.net

NHS Fraud & Corruption Reporting Line - **0800 028 40 60** or <https://cfa.nhs.uk/reportfraud>

- **Deal with the matter promptly**

Any delay may cause the Trust to suffer further financial loss.

- **Do not ridicule suspicions raised by staff**

The Trust cannot operate effective anti-fraud and whistle blowing policies if staff are reluctant to pass on their concerns to management.

- **Do not approach or accuse any individuals directly**

- **Do not convey your suspicions to anyone other than those with the proper authority**

- **Do not try to investigate the matter yourself**

There are special rules surrounding the gathering of evidence for use in criminal cases. Any attempt to gather evidence by people who are unfamiliar with these rules may destroy the case.

6 Overall Responsibility for the Document

Director of Finance, LCFS and Audit Committee.

7 Consultation and Ratification

The design and process of review and revision of this policy will comply with The Development and Management of Formal Documents.

The review period for this document is set as default of one year from the date it was last ratified, or earlier if developments within or external to the Trust indicate the need for a significant revision to the procedures described.

This document will be reviewed by the LCFS and ratified by the Director of Finance.

Non-significant amendments to this document may be made, under delegated authority from the Director of Finance, by the nominated owner. These must be ratified by the Director and/or the Audit Committee.

Significant reviews and revisions to this document will include a consultation with named groups, or grades across the Trust. For non-significant amendments, informal consultation will be restricted to named groups, or grades who are directly affected by the proposed changes.

8 Dissemination and Implementation

Following approval and ratification, this policy will be published in the Trust's formal documents library and all staff will be notified through the Trust's normal notification process

Document control arrangements will be in accordance with The Development and Management of Formal Documents.

The document owner will be responsible for agreeing the training requirements associated with the newly ratified document with the named Director and for working with the Trust's training function, if required, to arrange for the required training to be delivered.

9 Monitoring Compliance and Effectiveness

Monitoring of the policy is essential to ensuring that controls are appropriate and robust enough to prevent or reduce fraud.

The LCFS will undertake the monitoring on an annual basis. Any amendments will be reported to the Director of Finance and reported to the Audit Committee if there are significant changes.

Raising Concerns Policy & Speaking up leaflet

Performance and Conduct policy

Standards of Business Conduct policy

NHS England Managing Conflicts of Interest guidance

NHS Counter Fraud Authority Fraud Manual

Fraud Act 2006

Bribery Act 2010

Theft Act 1968

Computer Misuse Act 1990

Dissemination Plan			
Document Title	Fraud, Bribery & Corruption Policy		
Date Finalised	July 2021		
Previous Documents			
Action to retrieve old copies	Removed from Staffnet		
Dissemination Plan			
Recipient(s)	When	How	Responsibility
All Trust staff		IG StaffNet Page	Information Governance Team

Review Checklist		
Title	Is the title clear and unambiguous?	√
	Is it clear whether the document is a policy, procedure, protocol, framework, APN or SOP?	√
	Does the style & format comply?	√
Rationale	Are reasons for development of the document stated?	√
Development Process	Is the method described in brief?	√
	Are people involved in the development identified?	√
	Has a reasonable attempt has been made to ensure relevant expertise has been used?	√
	Is there evidence of consultation with stakeholders and users?	√
Content	Is the objective of the document clear?	√
	Is the target population clear and unambiguous?	√
	Are the intended outcomes described?	√
	Are the statements clear and unambiguous?	√
Evidence Base	Is the type of evidence to support the document identified explicitly?	√
	Are key references cited and in full?	√
	Are supporting documents referenced?	√
Approval	Does the document identify which committee/group will review it?	√
	If appropriate have the joint Human Resources/staff side committee (or equivalent) approved the document?	√
	Does the document identify which Executive Director will ratify it?	√
Dissemination & Implementation	Is there an outline/plan to identify how this will be done?	√
	Does the plan include the necessary training/support to ensure compliance?	√
Document Control	Does the document identify where it will be held?	√
	Have archiving arrangements for superseded documents been addressed?	√
Monitoring Compliance & Effectiveness	Are there measurable standards or KPIs to support the monitoring of compliance with and effectiveness of the document?	√
	Is there a plan to review or audit compliance with the document?	√
Review Date	Is the review date identified?	√
	Is the frequency of review identified? If so is it acceptable?	√
Overall Responsibility	Is it clear who will be responsible for co-ordinating the dissemination, implementation and review of the document?	√

Core Information	
Date	29 July 2021
Title	Fraud, Bribery and Corruption Policy
What are the aims, objectives & projected outcomes?	To ensure that those working for University Hospitals Plymouth NHS Trust understand the Public Sector values, Fraud and Bribery Act and know how to report any concerns/suspicions about fraud or corruption
Scope of the assessment	
This assessment will highlight any areas of inequality with the implementation of this policy	
Collecting data	
Race	This policy can be made available in alternative languages
Religion	The document has no impact on this area
Disability	This policy can be made available in alternative formats
Sex	The document has no impact on this area
Gender Identity	The document has no impact on this area
Sexual Orientation	The document has no impact on this area
Age	The document has no impact on this area
Socio-Economic	The document has no impact on this area
Human Rights	The Human Rights Act is adhered to when undertaking any investigation
What are the overall trends/patterns in the above data?	There are no trends/patterns in this data
Specific issues and data gaps that may need to be addressed through consultation or further research	Trust wide documents can be made available in a number of different formats and languages as required. No further research is required as there are no further equality issues.

Involving and consulting stakeholders				
Internal involvement and consultation	This policy has been compiled by the Local Counter Fraud Specialist. The policy has been circulated to staff within the Finance and Governance departments for consultation and presented at Audit Committee for approval			
External involvement and consultation	External consultation has been given to Police & Criminal Evidence Act, NHS Counter Fraud Authority and the NHS Fraud Manual			
Impact Assessment				
Overall assessment and analysis of the evidence	<p>This assessment has shown that there could be an impact on race or disability groups. However this document can be made available in other formats and languages if required. This document does not have the potential to cause unlawful discrimination.</p> <p>This document does not have negative impact</p>			
Action Plan				
Action	Owner	Risks	Completion Date	Progress update
Provide document in alternative formats and languages if requested	Director of Finance	Potential cost impact	Ongoing	This action will be addressed as and when the need occurs.

Action to be taken if YOU discover or suspect FRAUD, BRIBERY/CORRUPTION or THEFT

	This includes:	What to do:-
FRAUD	When a person knowingly or recklessly obtains money or property to which they have no entitlement – it is theft through using deception	You must discuss your suspicions or what you have discovered with one of the following:- <ul style="list-style-type: none"> ➤ The Director of Finance ➤ Directly with the Trust’s Local Counter Fraud Specialist on 01752 431378/ 0778 986 8568/ tracy.wheeler2@nhs.net ➤ Crimestoppers line Free Phone 0800 028 40 60 or https://cfa.nhs.uk/reportfraud
BRIBERY/ CORRUPTION	Where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.	
THEFT	Any misappropriation, stealing, malicious damage and actual or attempted break-in.	This MUST be reported to your line manager who will report the incident to the Local Security Management Specialist (LSMS) Andrew Davies mobile 07798 564 340 or JoanneWoolley 01752 437004 An incident report form must be completed in accordance with Trust procedure.
DO’S and DON’T’S	➤ If you are suspicious or have concerns DO report it - confidentiality will be respected	
	➤ DO NOT confront the individual with your suspicions	
	➤ DO NOT contact the police directly – go via one of the contacts above first	
	➤ DO Keep or copy any document that arouse your suspicions	