

**Reference Number:** UHB054  
**Version Number:** 3

**Date of Next Review:** 11 May 2025  
**Previous Trust/LHB Reference Number:** T129

## Counter Fraud Bribery and Corruption Policy

### Policy Statement

This policy is designed to promote an anti-fraud and corruption culture and to ensure that there are appropriate measures in place to deter, detect, prevent and investigate fraud. It aims to eliminate fraud and corruption within CAVUHB as far as possible. The policy also provides a framework for responding to suspicions of fraud, together with advice and information on fraud, and the implications and outcome of counter fraud investigations.

This policy is based upon the model policy produced for the NHS by the Local Counter Fraud Specialist and is intended as a guide for all staff on counter fraud work within the NHS. All genuine suspicions of fraud and corruption can be reported to the Local Counter Fraud Specialist or through the NHS Fraud and Corruption Reporting Line.

### Policy Commitment

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. They find fraud committed by a minority wholly unacceptable as it ultimately leads to a reduction in the resources available for the provision of services.

All members of staff have a duty to ensure that public funds are safeguarded and a duty to protect CAVUHB from fraud, corruption or any irregularity. CAVUHB encourages anyone having reasonable suspicions of fraud to report them. If a member of staff has any concerns regarding fraud or corruption, or has seen any suspicious acts or events, they must report the matter to the nominated Local Counter Fraud Specialist, or to the National Fraud Reporting Line or the Chief Executive or Deputy, or Executive Director of Finance.

CAVUHB is committed to the rigorous investigation of any fraud allegations and to taking appropriate action against the wrong doers. This includes disciplinary action and criminal prosecution when it is necessary.

### Supporting Procedures and Written Control Documents

This Policy should be read in conjunction with the supporting **Counter Fraud and Corruption Procedure**, the All Wales Raising Concerns Policy and the All Wales Disciplinary Policy.

### Scope

This policy relates to all forms of fraud and corruption and is intended to provide direction and help to members of staff who may identify suspected fraud.

It is intended to provide a framework for responding to suspicions of fraud, advice and information on various aspects of fraud and implications of an investigation.

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| Document Title: <i>CFBC POLICY</i>         | 2 of 2 | Approval Date: 11 May 2023       |
| Reference Number: UHB054                   |        | Next Review Date: 11 May 2025    |
| Version Number: 3                          |        | Date of Publication: 16 May 2023 |
| Approved By: Audit and Assurance Committee |        |                                  |

This policy applies to all CAVUHB staff, including secondees, those engaged via the bank, volunteers, those with honorary contracts, Independent Members, those working in bodies hosted by CAVUHB and other parties who may have a business relationship with CAVUHB e.g. consultants, vendors or contractors.

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| <b>Equality Impact Assessment</b> | An Equality and Health Impact Assessment (EHIA) has been completed and this found there to be no impact. This policy relies on the generic EHIA for admin type policies. |
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| <b>Health Impact Assessment</b>  | A Health Impact Assessment (HIA) has not been completed as this an administration policy not related to healthcare. |
| <b>Policy Approved by</b>  | Audit Committee   |
| <b>Group with authority to approve procedures written to explain how this policy will be implemented</b> | Audit Committee   |
| <b>Accountable Executive or Clinical Board Director</b>  | Catherine Phillips, Executive Director of Finance.  |

**Disclaimer**

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the [Governance Directorate](#).

**Summary of reviews/amendments**

| Version Number | Date Review Approved | Date Published | Summary of Amendments                                    |
|----------------|----------------------|----------------|--|
| 1              | 24/05/2011           | 24/05/2011     | None   |
| 2              | 03/12/2019           | 05/12/2019     | Minor Amendments made                                    |
| 3              | 11/05/2023           | 16/05/2023     | Minor Amendments due to changes in NHS CFA requirements. |