

# **Anti-Fraud, Bribery and Corruption Policy**

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Target audience	All Staff
Summary	The policy relates to all forms of fraud, bribery and corruption and is intended to provide direction and help to colleagues who may identify suspected illegality. It provides a framework for responding to suspicions of fraud, bribery, and corruption; advice and information, and the implications of an investigation
Changes since last revision	A Full Review, Equality Impact Assessment, and Privacy Impact assessment have been completed. Additionally, the policy has been updated to include the failure to prevent offence.
Monitoring arrangements	This policy will be reviewed by the LCFS every two years or soon if legislative or procedural changes arise.
Training requirements	All new starters will receive details of the counter fraud arrangements in the staff induction package. The LCFS will undertake a fraud awareness presentation to Bradford Teaching Hospitals Foundation Trust employees on an annual basis or as required. Teams who wish to arrange a bespoke counter fraud presentation tailored to their roles and responsibilities may do so by contacting the LCFS directly. The LCFS is able to offer a range of different training and awareness packages. Staff members are encouraged to discuss their requirements or topics of interest with the LCFS to access training which is appropriate for their specific role. If face-to-face or electronic presentations do not meet the needs of individual staff, there is a Fraud Awareness E-Learning module available. Staff can access this by contacting the LCFS.
Equality Impact Assessment	The Policy was assessed 13/05/2025. No equality implications identified that are not already mitigates and this is not a policy that will work to advance EDI.

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## **1 Introduction**

### **1.1 General**

Bradford Teaching Hospital NHS Foundation Trust is committed to reducing the level of fraud, bribery and corruption to an absolute minimum and keeping it at that level, freeing up public resources for better patient care. When fraud is proven, the organisation will seek the appropriate disciplinary, regulatory, civil and criminal sanctions, and will attempt to recover losses where possible. This policy is endorsed by the Director of Finance.

### **1.2 Aims and objectives**

This policy relates to all forms of fraud, bribery and corruption and is intended to provide direction and help to colleagues who may identify suspected illegality. It provides a framework for responding to suspicions of fraud, bribery and corruption, advice and information, and the implications of an investigation. It is not intended to provide a comprehensive approach to preventing and detecting fraud, bribery and corruption. The overall aims of this policy are to:

- improve the knowledge and understanding of everyone in and associated with Bradford Teaching Hospital NHS Foundation Trust, irrespective of their position, about the risk of fraud, bribery and corruption within the organisation and its unacceptability
- assist in promoting a climate of openness and an environment where people feel able to raise concerns sensibly and responsibly.
- set out the organisation's responsibilities in terms of the deterrence, prevention, detection and investigation of fraud, bribery and corruption.
- This policy aims to be accessible to all and staff are encouraged to review with regularity.

### **1.3 Scope**

This policy applies to all Bradford Teaching Hospital NHS Foundation Trust colleagues, the member's council, non-executive directors, contractors, suppliers and other internal and external stakeholders.

## **2 Definitions**

### **2.1 NHS Counter Fraud Authority**

The NHS Counter Fraud Authority (NHSCFA) is a special health body who oversee the national fight against NHS fraud. Any fraud, bribery or corruption investigations undertaken on behalf of Bradford Teaching Hospitals Foundation Trust will be conducted following NHSCFA guidance.

### **2.2 Fraud**

Section 1 of the Fraud Act 2006 defines the offence of fraud. Fraud can be committed in several ways. The most common fraud offences are:

- Fraud by false representation – lying about something using any means. For example, a patient submitting false travel expense claims or a contractor submitting inflated invoices.
- Fraud by failure to disclose – not sharing information when you have a legal obligation to do so. For example, not providing an honest response about previous criminal convictions on a job application.
- Fraud by abuse of position (Section 4) – abusing a position where you are expected to safeguard the financial interests of another person or organisation. For example, ignoring procurement rules in order to award NHS contracts to a friend.

All offences under the Fraud Act 2006 occur where the person has behaved dishonestly and with the intention to cause a gain or loss. The person does not have to be successful in making a gain or causing a loss, as long as the intention was there.

For example, imagine that someone puts false data into the expenses system to try to get money they are not actually entitled to. The false data is noticed before any payments are made, and the person does not get any extra money. The person could still be prosecuted for fraud, even though their attempt to get extra money was unsuccessful.

### 2.3 **Bribery and corruption**

The Bribery Act 2010 makes it a criminal offence to give, promise or offer a bribe. It is also an offence to ask for, agree to, or accept a bribe. These offences can be committed directly or via a third person.

It is extremely important that staff follow the guidance contained within the Conflicts of Interest Policy. The Conflicts of Interest Policy sets out the expectations around the conduct of Bradford Teaching Hospitals Foundation Trust staff in relation to various matters such as gifts, hospitality, and declaring personal or professional interests.

The Bribery Act also introduced a corporate offence of failing to prevent bribery. This offence applies where an organisation has not put enough bribery prevention procedures in place. This offence will be explored if someone connected to the organisation commits a different bribery offence (such as offering or accepting a bribe).

Corruption often involves the offering or accepting of gifts, favours, payments or other benefits that are designed to encourage the recipient to act improperly. Corruption does not always result in a loss to an organisation. However, corrupt behaviour falls far short of the levels of professionalism and accountability that NHS staff are expected to display. The Standards of Business Conduct Policy sets out the Bradford Teaching Hospitals Foundation Trust's expectations regarding staff behaviour.

### 2.4 **Failure to Prevent Fraud**

The Economic Crime and Corporate Transparency Act 2023 introduced an additional fraud offence:

Section 199 Failure to Prevent Fraud: large organisations are held accountable if someone associated with them (such as an employee) commits fraud to benefit:

1. The organisation itself, or
2. A person or company that the organisation provides services to.

A large organisation is defined as employing more than 250 people, having a turnover of over £36 million, or owning assets of over £18 million.

An organisation can be prosecuted if the criteria above are met, and the organisation doesn't have sufficient measures in place to prevent fraud.

### **3 Roles and responsibilities**

All members of Bradford Teaching Hospitals Foundation Trust staff have a duty to protect NHS funds. If a member of staff thinks they have identified a potential fraud risk, they should inform the Local Counter Fraud Specialist (LCFS) or the NHSCFA. You can find the details of how to contact the LCFS or the NHSCFA in Appendix A of this policy.

This section sets out the roles and responsibilities of employees and other relevant parties in reporting fraud, bribery or corruption concerns.

### **3.1 Chief Executive**

The Chief Executive has overall responsibility for funds entrusted to the organisation as the accountable officer. 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 the public funds entrusted to it.

### **3.2 Chief Finance Officer (CFO)**

The Chief Finance Officer is provided with powers to approve financial transactions across the organisation.

The Chief Finance Officer prepares documents and maintains detailed financial procedures and systems that incorporate the principles of separation of duties and internal checks to supplement those procedures and systems.

The Chief Finance Officer reports annually to the Board on the adequacy of internal financial control and risk management, as part of the Board's overall responsibility to prepare an annual governance statement for inclusion in Bradford Teaching Hospital NHS Foundation Trust's annual report.

The Chief Finance Officer will, depending on the outcome of initial investigations, inform appropriate senior management of suspected cases of fraud, bribery and corruption, especially in cases where the loss may be significant or where the incident may lead to adverse publicity. If an investigation is deemed appropriate, the Chief Finance Officer will delegate to Bradford Teaching Hospital NHS Foundation Trust's LCFS who has responsibility for leading the investigation, whilst retaining overall responsibility.

### **3.3 Internal and external audit**

The role of internal and external audit includes reviewing controls and systems and ensuring compliance with financial instructions. Any incident or suspicion that comes to internal or external audit's attention must be passed immediately to the nominated LCFS. The outcome of the investigation may necessitate further work by internal or external audit to review systems.

### **3.4 Human Resources**

When suspicions of fraud involve contractors or staff, the LCFS will liaise with Human Resources department following an initial discussion with the Chief Finance Officer.

Human Resources will support Bradford Teaching Hospitals Foundation Trust to ensure that disciplinary procedures are appropriately applied.

The Human Resources department will advise those subject to an investigation of employment law and other procedural matters, such as disciplinary or complaints procedures.

The LCFS and Bradford Teaching Hospitals Foundation Trust provider of Human Resources services will liaise closely on fraud investigations to ensure that any sanctions are applied effectively and in a coordinated manner.

### **3.5 Local Counter Fraud Specialist**

The LCFS is responsible for counter fraud work at the Bradford Teaching Hospitals

Foundation Trust. The LCFS will carry out this work in line with the national standards published by the NHSCFA.

The LCFS reports directly to the Director of Finance. The LCFS will work with key colleagues and stakeholders to promote the counter fraud message.

The LCFS will investigate allegations of fraud and corruption following the instructions of the NHSCFA.

The LCFS will provide regular updates on current investigations to the Chief Finance Officer and the Audit and Assurance Committee.

The LCFS is responsible for all external reporting requirements.

The LCFS will play an active part in raising fraud awareness and enforcing the message that fraud within Bradford Teaching Hospitals Foundation Trust is not acceptable and will not be tolerated.

The Counter Fraud service for the Trust is provided by Audit Yorkshire. The Trust endorses and supports the Audit Yorkshire Counter Fraud Strategy, which aligns with the NHS Counter Fraud Authority Strategy 2020-23. For further information about the Audit Yorkshire Counter Fraud Strategy, please contact your LCFS.

The LCFS will:

- Inform the Chief Finance Officer of any fraud referrals received.
- Take responsibility for the day-to-day implementation of anti-fraud, bribery and corruption activity.
- Take responsibility for investigating fraud referrals.
- Consult with the Chief Finance Officer to identify cases that need to be escalated to the NHSCFA or police.
- Log cases and investigation outcomes using the investigation database provided by the NHSCFA.
- Ensure that other relevant colleagues are notified of referrals received (for example, Human Resources staff would be notified if an allegation was received relating to a member of staff).
  - Ensure that any system weaknesses that are identified during investigative work are followed up with management and reported to Internal Audit.

#### **Regarding Failure to Prevent:**

- Contact from the LCFS at presentations, inductions, and alerts will continue to ensure robust reporting routes. The Trust aims to inform the wider organisation and staffing network.
- Fraud Risk Assessments are carried out by the LCFS and these risks are reviewed regularly to allow for changes and updates.
- Relevant Risk owners are assigned key fraud risks at the Trust for ongoing review and monitoring.

### **3.7 Managers and Team Leaders**

Managers and Team Leaders must be vigilant and ensure that procedures to guard against fraud, bribery and corruption are followed. They should be alert to the possibility that unusual events or transactions could be symptoms of fraud, bribery or corruption, and any such instances must be reported immediately to the nominated LCFS.

Managers and Team Leaders must instil and encourage an anti-fraud, bribery and

corruption culture within their team and ensure that information on procedures is made available to all colleagues. 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 or corruption which come to the attention of a manager or team leader must be reported immediately. It is appreciated that some colleagues will initially raise concerns with their manager or team leader. However, in such cases, managers and team leaders 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.

Fraud education and awareness such as training, intranet updates and monthly communication is ongoing at the Trust. Staff have the opportunity to attend any relevant online masterclass programme and that the LCFS is also happy to provide bespoke counter fraud training on request.

Internal and external fraud risks are considered. Fraud risks are discussed at Audit Committee and the committee is apprised of emerging or receding risks.

As part of that responsibility, line managers need to:

- ensure that all colleagues for whom they are accountable are made aware of the requirements of this policy.
- assess the types of risk involved in the operations for which they are responsible.
- ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, staff rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews, reconciliations and test checks to ensure that control measures continue to operate effectively.
- Take responsibility (together with Human Resources) for the enforcement of disciplinary action for staff who do not comply with policies and procedures.

### **3.8 All colleagues**

Bradford Teaching Hospital NHS Foundation Trust's Standing Orders, Standing Financial Instructions, policies and procedures place an obligation on all colleagues and non-executive directors to act in accordance with best practice.

Colleagues 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.

Colleagues also have a duty to protect Bradford Teaching Hospital NHS Foundation Trust's assets, including information, goodwill and property.

In addition, all colleagues 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, colleagues 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 Bradford Teaching Hospital NHS Foundation Trust's colleagues deal fairly and impartially with official matters.
- be alert to the possibility that others might be attempting to deceive.

All colleagues 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.

If a colleague suspects that there has been fraud or corruption, or has seen any suspicious acts or events, they must report the matter to the nominated LCFS

### **3.9 Freedom to Speak Up Guardian**

FTSU guardians have a key role in helping to raise the profile of raising concerns in their organisation and provide confidential advice and support to staff in relation to concerns they have about **risk, malpractice or wrongdoing** if you think it is harming the service we deliver.

Guardians don't get involved in investigations or complaints but help to facilitate the raising concerns process where needed, ensuring organisational policies are followed correctly. The Guardian will liaise directly with the trusts nominated Counter Fraud Specialist where required to ensure the correct reporting procedure is followed.

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a concern. Nor will we tolerate any attempt to bully you into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action.

Provided you are acting honestly, it does not matter if you are mistaken or if there is an innocent explanation for your concerns.

### **3.10 Information management and technology**

The Computer Misuse Act (1990) recognises the following offences:

- Accessing computer material without permission, e.g. looking at someone else's files.
- Accessing computer material without permission with intent to commit further criminal offences, e.g. *hacking* into the bank's computer and wanting to increase the amount in your account.
- Altering computer data without permission, e.g. writing a virus to destroy someone else's data, or actually changing the money in an account.

### **3.11 Fraud Champion**

All NHS bodies are expected to appoint a Fraud Champion. The role of the Fraud Champion is as follows:

1. To promote awareness of fraud, bribery and corruption
2. To understand the threat posed by fraud, bribery and corruption.
3. To understand best practice on counter fraud

The Fraud Champion is not expected to take referrals from concerned staff. If a member of staff contacts the Fraud Champion wanting to make a report, they will be signposted to the available reporting routes (via the LCFS, Director of Finance, or NHSCFA Reporting Line).

The LCFS and the Fraud Champion will work closely together to ensure that there is no duplication of effort. The Fraud Champion for Bradford Teaching Hospitals Foundation Trust is:

**Michael Quinlan:**  
[Michael.Quinlan@bthft.nhs.uk](mailto:Michael.Quinlan@bthft.nhs.uk)

With Failure to Prevent Fraud in mind, the Trust has an ongoing commitment to establishing a counter-fraud culture with visible executive support via the Counter Fraud Champion.

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

#### 4.1 Reporting fraud or corruption

Fraud can be discovered in a number of ways. In all cases, it is essential that members of staff are able to report their concerns and know how to do so.

All staff should report their suspicions to the Local Counter Fraud Specialist who is authorised to treat concerns raised in the strictest confidence and anonymously if requested.

A referral form can be found in Appendix 2 of this policy. The LCFS will undertake to acknowledge receipt of this referral within 2 working days unless otherwise requested.

To report any suspicions of fraud and/or corruption please use the contact details below:

Richard Maw

Steve Moss

Local Counter Fraud Specialist

Head of Anti-Crime Services

[r.maw@nhs.net](mailto:r.maw@nhs.net)

[steven.moss@nhs.net](mailto:steven.moss@nhs.net)

07771 390 544

07717 356707

The LCFS will inform the Chief Finance Officer if the suspicion seems well founded. If proportionate, the LCFS will conduct a thorough investigation. Concerns may also be discussed with the Chief Finance Officer and the Chair of the Audit and Assurance Committee.

Allegations are investigated by the LCFS in a professional manner aimed at ensuring that the current and future interests of Bradford Teaching Hospitals Foundation Trust and the suspected individual(s) are protected. An allegation of fraud does not automatically mean the suspect is guilty.

If the allegation is proven, the suspect may face a range of sanctions. The investigation will be conducted in line with legislation and with a view to achieving the most proportionate outcome.

**Appendix 1** provides a reminder of the key contacts and a checklist of the actions to follow if fraud, bribery and corruption, or other illegal acts, are discovered or suspected. Managers are encouraged to copy this to staff and to place it on staff noticeboards in their department.

**Appendix 2** provides a template to report your concerns of Fraud, Bribery and Corruption to the Local Counter Fraud Specialist in writing by post.

Any colleague can contact any executive or non-executive director of Bradford Teaching Hospital NHS Foundation Trust to discuss their concerns if they feel unable, for any reason, to report the matter to the LCFS or Director of Finance.

Suspected fraud, bribery and corruption can also be reported using the **NHS Fraud and Corruption Reporting Line on Freephone 0800 028 40 60** or by filling in an online form at [www.reportnhsfraud.nhs.uk](http://www.reportnhsfraud.nhs.uk), as an alternative to internal reporting procedures and if staff wish to remain anonymous.

All reports of fraud, bribery and corruption will be taken seriously and thoroughly investigated.

Fraud reporting is encouraged. When a person is dismissed or prosecuted due to fraud this will be publicised by the Trust.

#### 4.2 Sanctions and Redress

The full range of sanctions includes:

- Criminal – criminal cases are heard in court with the view to obtaining a criminal conviction and appropriate sentence (this could include a prison sentence, a fine, a compensation order and award of court costs). Bradford Teaching Hospitals Foundation Trust and the LCFS will look to recover losses under the Proceeds of Crime Act 2002 (POCA) wherever appropriate.
- Civil – civil proceedings seek to recover money or assets through the civil courts. Before embarking on such a claim, Bradford Teaching Hospitals Foundation Trust will consider whether the cost of court action would outweigh the monies recovered. Bradford Teaching Hospitals Foundation Trust will also consider the potential deterrent effect and whether the individual has the ability to pay.
- Disciplinary – disciplinary proceedings are initiated via Human Resources. The disciplinary policy is available on the intranet. Where the individual is a registered professional, it may also be necessary to notify their professional body (e.g. the General Medical Council or Nursing and Midwifery Council).

All three types of sanction will be considered and a combination of sanctions can be used. Bradford Teaching Hospitals Foundation Trust may also consider financial recovery outside of a criminal case by mediation and/or voluntary repayment as appropriate.

The decision on the sanctions to be pursued will be determined by the Chief Finance Officer in conjunction with the NHSCFA and the Crown Prosecution Service (CPS) as appropriate.

If the allegation relates to an individual or group that is external to Bradford Teaching Hospitals Foundation Trust, the LCFS will consider both criminal and civil routes for progressing the investigation. Depending on the circumstances, it may be necessary to inform the police.

Where a staff member is suspected of fraud, bribery or corruption Bradford Teaching Hospitals Foundation Trust will determine on the appropriate disciplinary action, in accordance with the Disciplinary Policy. The LCFS will

work closely with Human Resources representatives where disciplinary action is necessary.

The duty to follow disciplinary procedures for Bradford Teaching Hospitals Foundation Trust staff does not prevent the consideration of the other available sanctions.

#### **4.3 Training**

All new starters will receive details of the counter fraud arrangements in the staff induction package.

The LCFS will undertake a fraud awareness presentation to Bradford Teaching Hospitals Foundation Trust employees on an annual basis or as required.

Teams who wish to arrange a bespoke counter fraud presentation tailored to their roles and responsibilities may do so by contacting the LCFS directly. The LCFS is able to offer a range of different training and awareness packages.

Staff members are encouraged to discuss their requirements or topics of interest with the LCFS to access training which is appropriate for their specific role.

If face-to-face or electronic presentations do not meet the needs of individual staff, there is a Fraud Awareness E-Learning module available. Staff can access this by contacting the LCFS.

#### **4.4 Risk Assessments**

The Trust carries out comprehensive local risk assessments to identify fraud, bribery and corruption risks, and has counter fraud, bribery and corruption provision that is proportionate to the level of risk identified.

Risk analysis is undertaken in line with Government Counter Fraud Profession (GCFP) fraud risk assessment methodology and is recorded and managed in line with the organisation's risk management policy.

Measures to mitigate identified risks are included in an organisational work plan, progress is monitored at a senior level within the organisation and results are fed back to the audit committee (or equivalent body).

### **5 Review**

#### **5.1 Monitoring and auditing of policy effectiveness**

Monitoring is essential to ensuring that controls are appropriate and robust enough to prevent or reduce fraud. Arrangements might include reviewing system controls on an on-going basis and identifying weaknesses in processes. Any weaknesses in policies or procedures may be identified by a number of sources including colleagues, Internal Audit or the LCFS.

Where deficiencies are identified as a result of monitoring, Bradford Teaching Hospital NHS Foundation Trust should explain how appropriate recommendations

and action plans are developed and how any recommendations made should be implemented.

## **5.2 Dissemination of the policy**

This policy will be available on the staff intranet and communicated to all colleagues where possible and when changes arise.

## **5.3 Review of the policy**

This policy will be reviewed by the LCFS every two years or sooner if legislative or procedural changes arise.

## **5.4 Equality Impact Assessment**

### **Equality Assessment Statement**

This Policy was assessed in September 2017 to determine whether there is a possible impact on any of the nine protected characteristics as defined in the Equality Act 2010. All new and updated policies need to have an equality impact assessment completed to determine whether there is any specific impact and action required to ensure our policies meet the needs of all protected characteristics.

It has been found to have a positive impact on:

- Age
- Disability
- Gender
- Gender reassignment
- Marriage and civil partnership
- Maternity/pregnancy
- Race and ethnicity
- Religion and belief
- Sexual orientation

It has also been assessed to determine whether it impacts on human rights against the FREDA principles (Fairness, Respect, Equality, Dignity, Autonomy) and it is considered that it does not have impact. This assessment will be reviewed when the policy is next updated or sooner if evidence of further impact emerges.

## **5.5 Privacy Impact Assessment**

The Privacy Impact Screening Tool was completed for this policy and no privacy implications were identified.

## **5.6 Financial Impact Assessment**

There is no financial impact of the implementation of this policy. It should be subsumed into the existing workloads of those with associated roles and responsibilities. There is a potential to invest in enhanced database capabilities to support the management and governance associated with organisation-wide procedural documents.

## **Policy Appendices: Quick Reference Guide to Reporting Fraud & Fraud Referral Form**

### **Appendix 1 – Quick Reference Guide to Reporting Fraud**

**Fraud** is a criminal offence which takes place when someone behaves dishonestly in order to make a gain for themselves (or someone else), or to cause a loss to someone else. Examples of fraud include:

- Lying about having qualifications or experience in order to gain a job.
- Failing to notify your employer about your criminal record.
- Putting false entries onto timesheets or expense claim systems.

More examples of the types of fraud which impact the NHS can be found on the NHS Counter Fraud Authority website.

**Bribery and corruption** take place when someone is paid or offered some kind of benefit in exchange for acting improperly. Some examples of this could include:

- A recruiting manager accepting money to ensure a particular job applicant is successful.
- A procurement manager bypassing official procedures in order to award NHS contracts to a friend or relative.

If you are concerned that fraud, bribery or corruption is taking place, please report your concerns following the guidance below.

#### **Please do:**

- Report your concerns. The NHS loses over £1.2 billion to fraud every year, every referral is important.
- Please keep a record of any useful information (such as dates or times of conversations, who else was present etc.) and hold onto any relevant material that supports your concerns (such as emails or documents).
- If you choose to make an anonymous referral, please make sure to provide as much information as possible as we will not be able to contact you to clarify any details.

**Please do not:**

- Try to investigate the matter yourself. To be able to take a case to court, the correct investigative procedures need to be followed.
- Please do not discuss your concerns with other members of staff – the more people who know the higher the chance that the suspect will find out and destroy or alter evidence.
- Please don't ignore your concerns. Report what you suspect using the contact details below.

You can report your concerns to the Local Counter Fraud Specialist team:

Richard Maw	<a href="mailto:r.maw@nhs.net">r.maw@nhs.net</a>	07771 390 544
Steve Moss	<a href="mailto:steven.moss@nhs.net">steven.moss@nhs.net</a>	07717 356 707

If you prefer, you can report concerns to the NHS Counter Fraud Authority by calling:

**0800 028 40 60** or by using their online reporting tool.

## APPENDIX 2 – Fraud Referral Form

**Your concerns** – please provide as much detail as possible about what you suspect may have happened. If you can provide dates, times, where evidence could be located, who else may be able to assist with our enquiries, please do so. Please continue on a separate sheet if required.

**Your name:**

**Your place of work:**

**Your job title:**

**Your telephone number/email address:**

Once complete, this form should be returned to Richard Maw [r.maw@nhs.net](mailto:r.maw@nhs.net)

**About the Other Person/People** – please let us know who you suspect is involved in wrongdoing, giving as much detail as possible. Try to include full names, job roles, places of work etc.

Or Steve Moss ([steven.moss@nhs.net](mailto:steven.moss@nhs.net)).

If you would prefer to speak to us over the phone or if you have any questions about how to fill in this form you can call us on 07771 390 544 (Richard) or 07717 356707 (Steve).