

False representation

This is the most common type of fraud investigated within the NHS. This normally involves a false declaration being made, such as working whilst sick. The staff member is being paid sick pay by the CCGs, but is then being paid for secondary employment too, whether that is in the NHS or otherwise.

Failure to disclose

This could be relating to any information where there is a legal duty to disclose. For example, failing to disclose a criminal record or anything that could affect your DBS checks.

Abuse of position

This is when someone abuses their position of authority against another person or their employer, for personal or financial gain, or to cause loss to another. Essentially, those who know how to use the systems, but ultimately abuse them too.

Counter Fraud

Fraud against the NHS means that the money intended for patient care, and funded by the taxpayer, ends up in the pockets of those who did not legitimately earn it. It means fewer resources are available to be spent on frontline health services such as patient care, health care facilities, doctors, nurses and other staff.

Fraud, bribery, corruption and other illegal acts committed to obtain financial or professional gain, cost the NHS billions of pounds every year. In 2016-17 it was estimated that the cost to the NHS was around £1.25 billion per annum, as per the NHS Counter Fraud Authority, who assess that to be enough money to pay for over 40,000 staff nurses or to purchase over 5,000 frontline ambulances.

The CCGs are committed to maintaining an honest, open and well-intentioned approach to best fulfil the objectives of the NHS. This means the CCGs operate a zero-tolerance approach to fraud and bribery. Such conduct, at any level, is unacceptable.

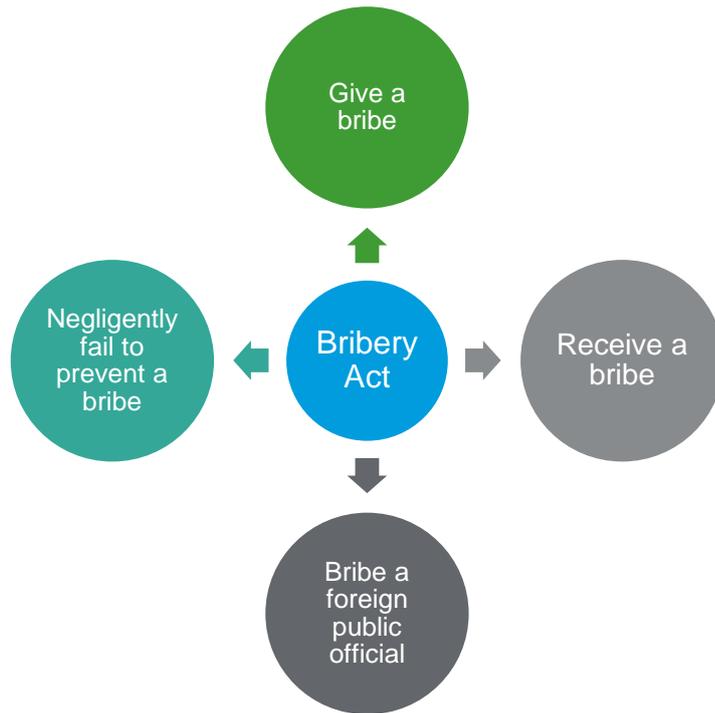
The CCGs ensure that there are effective controls in place throughout the organisation, including stringent policies and internal systems to prevent and detect bribery, in accordance with the Bribery Act 2010, and to counter fraud by ensuring compliance with the [NHS Counter Fraud Authority Standards for Commissioners](#).

What is fraud?

Fraud happens when someone makes a deliberate attempt to dishonestly make a gain for themselves or another or cause a loss to another. This may include any person who makes a false representation or dishonestly fails to disclose to another person information which they are under a legal duty to disclose, or commits fraud by abuse of position, including any offence as defined in the Fraud Act 2006. Examples of the three main fraud offences are provided below. Further information can be found in our Anti-Fraud and Anti-Bribery Policy.

What is bribery?

Bribery refers to the giving or receiving of an inducement, in return for a person committing an improper function. It is an offence to give or receive a bribe, or even offer or accept, even if the briber is never paid. A bribe is any inducement, financial or not, to encourage or reward someone to do something they should not do. The four main offences under the Bribery Act 2010 are detailed below. Further information can be found in our Anti-Fraud and Anti-Bribery Policy.



What can I do?

The first steps are being aware of the risk and remaining vigilant. You should also know how to report any suspicions or concerns you may have about fraud and/or bribery.

The CCGs contract RSM to provide the Counter Fraud service. Suspicions and concerns can be reported to the CCGs' Local Counter Fraud Specialist team:

Erin Sims on **07800 617 456** or at erin.sims@nhs.net.



Kasia Gruszka on **07436 268 597** or at kasia.gruszka@nhs.net



Paul Gedge on **07528 970 131** or at p.gedge@nhs.net



Alternatively, you can call the NHS Counter Fraud Authority's 24-hour reporting line anonymously on 0800 028 4060, or confidentially online at www.cfa.nhs.uk/reportfraud. More information about the NHS Counter Fraud Authority and examples of recent cases can be found [here](#).