

Business Plan 2024 to 2025



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Foreword



The Business Plan for 2024 to 2025 runs in parallel to the second year of our 2023 to 2026 Strategy. Following delivery of our first-year business plan, the strategic pillars of Understand, Prevent, Respond and Assure are now embedded in our working processes and operational methodology. Fraud, bribery and corruption continue to divert funds from NHS finances and therefore our purpose to protect the NHS in England remains as relevant as ever.

Countering fraud, bribery and corruption threats is a complex business and requires our people to have a wide range of skills. Our counter fraud specialists and supporting functions operate in an environment which constantly evolves, often with conflicting priorities and significant uncertainty. They must operate with precision in their area of expertise but also in a way that complements

co-existing disciplines, for example, our criminal investigators play a significant role in developing prevention advice. This is why we have adopted an integrated approach to business planning. This year, development will continue by being more proactive and stepping up our use of technology. A strong human resources function will enable us to value our people and support our ambitions in this area.

To support our technology ambitions, the plan describes how we will make a significant investment in data analytical capability. Through the development of learning models focused on known areas of risk, we believe there is a substantial opportunity to improve the identification of fraud, error and abuse. This insight will enable controls to be strengthened, influence policy change, and improve operational outcomes. As machine learning and artificial intelligence develop in society and in government, this pilot programme will stand us in good stead to maximise the benefits of technology and people skills in this field. The programme will be known as Project Athena.

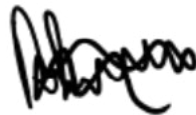
We will also continue to develop our relationships with stakeholders and value the support that Local Counter Fraud Specialists (LCFSs) provide to the health sector. The Fraud Hub has demonstrably improved our interaction with health bodies, LCFSs and the organisations that employ them. We will now seek to use our new operating model and the data we possess to

drive improvements in performance and meet assurance standards. Our communications specialists will support this work and promote our activity.

Over the past year, we have successfully prosecuted people for criminal offences and secured substantial sentences. To enhance learning from investigations, we have produced learning reports which are shared with key stakeholders. This approach will continue and grow during the lifetime of this plan and forms part of our wider approach to prevention. Designing effective fraud-prevention strategies and measuring their success takes time. This will need to be balanced against the need to maintain capacity to respond to emerging threats which have unknown fraud prevention values when first identified.

The past year has also provided an opportunity to connect and benchmark our work with overseas jurisdictions and we continue to share our collective expertise with the devolved nations. This approach will continue and is of particular importance in understanding technology-use cases.

I look forward to working with our colleagues, stakeholders and partners during the lifetime of this plan. However, I would like to recognise the work of our outgoing Chair Tom Taylor, who has been with us for six years, and Non-Executive Directors Martin Spencer and Jayne Scott, who left at the end of 2023. Their expertise, knowledge and leadership enabled us to deliver genuine change and meaningful impact.



Alex Rothwell
Chief Executive
NHS Counter Fraud Authority

Our vision

In this second year of our three-year strategy, we continue to work collaboratively with partners, understand and respond to fraud when it occurs, and use our expertise in prevention to strengthen the system. Our strategic pillars will guide us to improve and innovate within an ever-changing landscape.

Vision statement

Working together to understand, find and prevent fraud, bribery and corruption in the NHS

Our purpose

To protect the NHS from fraud, bribery and corruption

We achieve this by:

- being experts and leaders in our field
- leading the NHS response
- empowering others
- putting the interests of the NHS and its patients first

Our Counter Fraud Pillars

In the first year of our new 2023 to 2026 Strategy, we introduced our four Counter Fraud Pillars of Understand, Prevent, Respond and Assure, which are underpinned by People and Resources.

Our pillars of counter fraud activity ensure that we do the following:

- **Understand** - we will understand how fraud, bribery and corruption affects the NHS
- **Prevent** - we will ensure the NHS is equipped to take proactive action to prevent future losses from occurring
- **Respond** - we are equipped to respond to fraud
- **Assure** - we can confidently assure our key partners, stakeholders and the public that the overall response to fraud across the NHS is robust

A foundation of our fraud-focused approach is an ambition to ensure we are supporting our People to deliver counter fraud activity in the NHS using our Resources whilst striving to identify and pursue opportunities for growth and innovation.

This plan will remain agile and responsive to the needs of the counter fraud effort within the wider NHS and is intended to evolve as risks develop.

Flexibility of the plan

For the second year of our strategy, the NHSCFA will develop proactive and impactful responses to the fraud threats faced by the NHS. We will work collaboratively with our partners and stakeholders to drive delivery of our annual plan and strategic targets. There will be an emphasis on the exploration and utilisation of new advances in technology to detect, prevent and deter fraud through innovation whilst continuing to flex to meet the increasing counter fraud needs of the NHS.

Year one reflections and opportunities

In year one, we introduced our four new fraud-focused pillars and the two foundations of our Resources and our People. We have initiated a series of corporate, transformation and control strategy projects including a data analytics programme called Project Athena that meets our strategic objective of increasing our focus on data and data analytics. We also introduced a new operating model. As a result, we are able to move forward in our second year to meet our ambition of challenging and facilitating efficiencies and improvements in operational service delivery to create a sustainable future for the organisation.

NHSCFA Fraud Hub

Our stakeholder engagement is being driven by our evolved Fraud Hub and we continue to work to grow our key strategic partnerships and collaborations. The work of our colleagues across health bodies is a vital part of preventing fraud in the NHS; one they have executed with diligence and expertise.

As part of our new operating model, we successfully established the Fraud Hub as the primary focal point for our colleagues in health bodies to work with us to tackle fraud. The Fraud Hub acts as the main point of contact between the NHSCFA and the wider NHS counter fraud community, bringing together the national and local counter fraud response; a valuable partnership with our counter fraud community. This collective working approach strengthens information sharing, amplifies our collective message and achieves better results across all parts of the NHS to reduce and prevent fraud.

The Fraud Hub's successes in the first year of the three-year strategy include a substantial increase in sanctions recorded by the counter fraud community and numerous engagement and information sharing programmes. To help build a culture of continuous improvement and knowledge sharing, new learning reports identify and share outcomes using investigations from real cases across the sector.

Partnership working and international learning

Our engagement continues to strengthen the NHSCFA's position as the national body for tackling fraud, bribery and corruption in the NHS.

In 2023 to 2024, we continued to work with our Four Nations partners in England, Scotland, Wales and Northern Ireland; meeting in Belfast and Cardiff for the final summit for counter fraud professionals in which we agreed our strategic intentions and shared our knowledge, experience and methodology. We have also shared key elements of counter fraud including the use of pillars, our approaches to prevention, data analytics, intelligence, and investigative best practices across the sector. The NHSCFA has also been represented internationally and our partners in Europe and the United States of America are part of a commitment to learn and evolve our thinking, practice and approach to fraud.

The theme of engagement across the sector continued with an emphasis on procurement in the NHS, where we took forward new local proactive exercises. These aim to drive improvements in due diligence and contract management capability in the health sector in England, improve our intelligence and the sectors' investigative response to procurement threats, and identify savings in fraud prevention across the sector.

Introducing our values and behaviours

We introduced our values and behaviours framework called 'Leading, Influence and empowerment, Fairness and Expertise' (LIFE), which underpins all our activity in the NHSCFA. It is led and championed by our Senior Management Team and embodies our principles and behaviour to which we aspire. Our People and Workforce Development Team has driven new behaviours in appraisals, coaching and leadership development programmes and policies.

Data and influence

Our emphasis on exploring novel insights from data continued internally and externally.

Internally, we introduced our Corporate Dashboard Suite; a central collection of organisational data which is presented on an accessible platform. This was the first step in an approach which focuses on how data leads to valuable information that will, in turn, improve performance monitoring. This will then provide better outcomes, more informed decision making, earlier sight of developing issues and identification of opportunities.

We have introduced and developed sector-specific dashboards with our stakeholders. These show relevant information for counter fraud professionals and distinct reporting for directors of finance in health bodies.

External reporting to our colleagues across the counter fraud community is also within a framework of support, performance and insight underpinned by the work enabled by the Fraud Hub.

Advanced data analytics (Project Athena)

With the introduction of the 2023 to 2026 Strategy, we highlighted the need to use data to tackle fraud at scale and share data and information with the sector in new ways.

The NHSCFA will lead the proactive approach to fraud identification by incorporating an aligned response, using pilot funding to use machine learning and analyse data to identify fraud. We will maintain our professional and ethical principles whilst using advanced analytical techniques and approaches to inform our response.

Detecting patterns in data will capture intelligence and offer opportunities for fraud prevention and enforcement. Greater use of data will also identify system weaknesses and support organisational wide fraud-proofing through processes and policies.

Collaboration and partnerships

As an arms-length body we will continue to build strong partnerships at a strategic level to influence system-wide change. To support this work, we will continue to develop bilateral partnerships with key stakeholders and create working relationships with international partners to benchmark performance and capture best practice. We are continuing to build on the links we have developed as we move into our second year of the strategy.

We will continue to maximise the benefits of our membership of the Health Counter Fraud Board, which brings together all national partners who are responsible for counter fraud service delivery by identifying the priority areas for collaborative effort.

The Control Strategy and Strategic Tasking and Coordination Group (CSSTCG) is an opportunity for us to collaborate with key partners include the NHS Business Services Authority (NHSBSA), NHS England (NHSE), the Department of Health & Social Care (DHSC) and UK Health Service Agency (UKHSA) to deliver focused and coordinated counter fraud activity based on agreed priorities and clear action plans.

Intelligence and horizon scanning

In the past year, we have seen a significant interest in the discipline of fraud risk assessment¹ and how that influences behaviour, appetite for fraud and corrective action to mitigate risk.

The more we know about fraud in the NHS, the more effective our response will be. Fraud risk, alongside our Strategic Intelligence Assessment (SIA), will inform our understanding to help formulate the right response to fraud and drive activity. With the introduction of horizon scanning in our strategic planning cycle earlier in the year, we continue to improve our strategic awareness of new and emerging areas that may present a threat. This is a process well founded and embedded within our robust integrated planning approach.

Responses to fraud

Whilst enforcement continues to be a significant tool and an important deterrent in countering fraud, we must remain alive to new and emerging ways of detecting fraud.

We will also explore appropriate, and timely, methods of dealing with fraud when it is found.

1. [Fraud Risk Assessment Standards \(2022-03-25\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Targeted campaigns to influence behavioural change and encourage reporting will also continue to be a key driver and will be supported by a targeted fraud-focused communications strategy which supports our stakeholders. Lessons learnt from investigative activity will be identified quickly with best practices shared. More prevention and investigative activity will be driven through data insight which will allow for system weakness to be closed.

Our people and resources

As part of a strengthened approach to strategic workforce planning, our new operating model will help to shape the response to fraud under the four pillars of activity. Internalisation of our HR function will provide quicker recruitment and stronger support to the workforce, improving areas such as talent management and wellbeing.

As we continue developing and embedding our performance culture, we believe that effective performance monitoring leads to better outcomes and more informed decision making. Therefore, in year two, there will be an increased focus on performance and accountability with clear data available and visible to the organisation at all levels. A new transformation function will also ensure the organisation can respond to a rapidly changing landscape.

Our integrated approach to delivery

This plan details the high-level programme of work the NHSCFA will implement during the second year of our three-year strategy. In this year, technology is something we will continue to embrace to facilitate smarter working principles, allowing for a more flexible working environment for our people, whilst continuing to use data to identify areas for collaborative prevention activity across the health sector to strengthen the controls against fraud. We must also remain alert to new and emerging threats that may take precedence over the life of this business plan to safeguard valuable resources from fraudsters who target the NHS.

We will do this by leading a positive and effective reaction to emerging threats; working with our partners to reduce any financial loss to fraud within the health sector. We will utilise a network of trained investigators, prevention specialists, intelligence expertise and data experts across the NHS to realise a direct financial value from enforcement and local proactive activity. We will also target key areas of fraud where we can collaborate and share resources to make the greatest impact on fraud within the NHS.

To fulfil our organisational ambitions, we will continually improve our integrated strategic approach. This will ensure our strategies for estates, finances, digital, data, service provision, prevention, intelligence, enforcement response, business planning and workforce are aligned.

The SIA details the key fraud threats, vulnerabilities and enablers within the NHS. Intelligence also assists us in identifying which priority areas should be our focus for the period of our strategy. It also informs our Control Strategy, which sets out our decisions as to where and how we can have the most effective influence and impact on fraud within the NHS. A combination of the SIA, Control Strategy and integrated planning cycle inform our work to achieve the maximum impact over the life of our Business Plan and 2023 to 2026 Strategy.

Financial assumptions

The delivery of this business plan is supported by robust financial planning that includes some key assumptions:

- the NHSCFA annual Government (DHSC) funding request for financial year 2024-25 is £22.567m. This includes £5.911m of project funding for Athena and £1.208m for our Capital Programme
- there will be no further changes in service delivery requirements outside of the current plans
- there are no further cost pressures above the current growth and inflation assumptions
- organisation change undertaken in 2022 to 2023 is still expected to achieve a performance improvement of 25% on the base performance target set in 2020 to 2023

The NHSCFA's financial framework

This supports the organisation in delivering its duties in a sustainable manner. As part of the framework, we will strive to achieve further investment in NHS counter fraud work by demonstrating it has a positive financial impact. The key elements of the framework are:

- financial management and controls are regularly scrutinised and reviewed at board level
- all opportunities to secure additional funding are identified to achieve best financial outcomes within three years generated by funding constraints

- financial balance is delivered by aligning financial and workforce planning
- routine monitoring of monthly financial position and risks is undertaken by the finance team, underpinned by monthly finance assurance meetings to review and assess the risk of the financial position with accountable budget holders

Our Audit and Risk Assurance Committee (ARAC) oversees all financial aspects of governance, including financial and non-financial risk management. The mitigations against financial and all other strategic risks are regularly reviewed as part of our risk management framework and are reported to the ARAC.

Portfolio of key corporate projects over the strategic period

Through our integrated business planning process, we initiated a series of corporate projects that commenced during 2023 to 2024. As with any value-adding project, or programme, the right amount of time allocated is the key to ensure success.

Set out in table one are the identified projects and programmes throughout the duration of the three-year strategy. These areas of work will be governed by a combination of project boards, highlight reports and strategic updates during the performance cycle and accountability process. All of these will be visible in the organisation's performance, programmes, and portfolio management system.

We will also continue to transform the NHSCFA over the remaining strategic period covering 2023 to 2026. We will facilitate efficiencies and improvements in service delivery for the sustainable future of the organisation. We will also ensure that the organisation remains fit for purpose within a flexible, agile operating model which is continually evolving to meet business and the needs of the NHS.

Table one: corporate projects and programmes over the life of our 2023-2026 Strategy

Corporate Annual Projects









Health-wide Control Strategy Priorities (Interdependencies with Project Athena)

	2023-24	2024-25	2025-26
 Procurement - Due Diligence and Contract Management	✓	✓	✓
 Multiple Employment Fraud	✓	✓	✓
 Intelligence Picture - Agency Fraud	✓	✓	
 Fraud Rate within Provider Assurance	✓	✓	
 Enterprise Fraud Risk Assessment (EFRA)	✓	✓	

Operational Business Projects

	2023-24	2024-25	2025-26
 Data Driven (Intervention/prevention)	✓	✓	✓
 Loss Measurement Initiatives	✓	✓	✓
 Prevention Initiatives	✓	✓	✓
 Customer Relationship Management System	✓	✓	
 Procurement of Case Management System	✓		
 Procurement of Analytical Tooling	✓		
 Learning Reports Approach		✓	
 Strategy Development 2026-2029		✓	✓
 Internal/External Reporting	✓		

Estates/ Transformation/ Investment Opportunities

	2023-24	2024-25	2025-26
Estates			
 NHSCFA Estates Rationalisation	✓	✓	✓
Transformation			
 Technology Transformation Review and Implementation	✓	✓	
 Project Athena	✓ Initiation Q4	✓	✓
 Mandatory Fraud Reporting	✓	✓	
 Benefits Realisation of Evolution Stage 1		✓	✓
 Business Case Development	✓	✓	✓

Delivery Plan 2024 - 2025

Within this plan we will achieve a fiscal impact on fraud that will contribute to the three-year strategic target of £500m. This will be a combination of initiatives and activities resulting from fraud prevention, fraud detection and fraud recovered.

Counter fraud financial impact will be driven by partnership working in key agreed areas within the strategic tasking and coordinating process to maximise counter fraud impact. We estimate that our year two combined minimum financial impact on fraud will be a minimum of £126m. This also includes counter fraud impact delivered locally and within Arm's Length Bodies.

Strategic Pillar - Understand

Strategic objective – Understand how fraud, bribery and corruption affects the NHS

Strategic actions over the life of the strategy (year 1 – 3)

- Produce a comprehensive assessment of the threat and effect of fraud against the NHS together with an identification of opportunities to respond to them from intelligence
- Deliver a comprehensive intelligence - gathering and dissemination function to support all parts of the NHS to evaluate, initiate and deliver an appropriate and effective operational response to fraud
- Develop and maintain an Enterprise - level Fraud Risk Assessment (EFRA) which proactively identifies, describes and assesses the risks to fraud across the NHS and identifies and evaluates mitigating controls
- Enhance our data analytical function to generate insight and counter fraud action from patterns in data indicative of fraud
- Develop and maintain a comprehensive assessment of the capacity and capability of the NHS to respond to counter fraud threats and to inform future development opportunities

Key area of focus (year 2)

Deliverables

A strengthened intelligence picture

Develop our intelligence to close gaps in knowledge in key areas of fraud within the NHS, thereby increasing our confidence to make our response to fraud more effective

	<p>Produce an annual Strategic Intelligence Assessment (SIA) to estimate financial vulnerability, identify threats and evaluate the risk of fraud to the NHS</p> <p>Continue the Enterprise Fraud Risk Assessment (EFRA) to include development of risk tolerance, risk appetite, identification of additional thematic areas and capture emerging fraud risks. (TBC subject to funding)</p>
Enhance the referral, collation, and dissemination of information	Following the successful enhancement of the key areas of focus in year one, we will ensure the embedding process is conducted via monitoring and maintain the challenging timelines from receipt of intelligence to decision and dissemination to relevant parties
Improved learning from intelligence reports	Delivery of organisation level Learning Reports to share opportunities for intervention and prevention with stakeholders across the NHS nationally
Continue to innovate the mechanisms for fraud reporting	Deliver and embed the Online Fraud Reporting (OFR) system into the NHSCFA
Lead the application of advanced data analysis techniques in countering fraud in health	Apply the skills and capabilities within the NHSCFA to tackle the most serious areas of fraud, areas identified through the Control Strategy and the Fraud Risk Assessment
Drive the use of data to support our understanding of fraud and drive key decision making in the counter fraud community	Embed and improve our insight and reporting capabilities that will inform and support the counter fraud community
Continue to strive for access to additional key datasets and collaboration with key partners in using data and systems for counter fraud purposes.	<p>Develop and deepen partnership working to secure data access, whilst also maintain existing sharing and practice agreements for key datasets and systems</p> <p>Collaborate with partners to embed business systems that will provide key analytical capabilities</p>

Strategic Pillar - Prevent

Strategic objective – We will ensure the NHS is equipped to take proactive action to prevent future losses from occurring

Strategic actions over the life of the strategy (year 1 – 3)

- Develop, co-ordinate and lead a fraud prevention and deterrence programme for the NHS
- Coordinate and lead robust fraud prevention and deterrence activities across the health group to protect the NHS from fraud losses
- Proactively promote a counter fraud culture within the NHS that develops fraud awareness and understanding across all areas of spend
- Develop and share good practice and lessons learned from all aspects of counter fraud activity in the NHS
- Influence the delivery of Fraud Risk Assessments and Initial Fraud Impact Assessments across areas of NHS expenditure and promote the fraud-proofing of all NHS systems and processes
- The innovative use of data to support the opportunities for prevention across key areas of business by designing, developing and delivering proactive analysis
- Develop a targeted fraud-focused communications and deterrence strategy

Key area of focus (year 2)

Deliverables

Engage with emerging legislation which is relevant to our function

Interpret Home Office guidance to the sector to support the adoption of the Failure to Prevent Fraud Offence introduced under the Economic Crime and Transparency Act 2023

Apply strategic tasking to areas of fraud risk

Develop and implement coordinated fraud prevention campaigns to tackle areas of specific strategic targeted risk

Provide fraud prevention support through horizon scanning and system weakness

Evaluate our horizon scanning processes to ensure we are improving our strategic awareness and that we are responding quickly to emerging threats

Issue fraud prevention guidance to the sector when required and provide advice on fraud proofing existing systems

The NHSCFA will explore solutions and advise on the introduction of a central fraud register for the NHS

Support local fraud prevention activity

Provide direct support and advice in respect of local proactive exercises

Provide timely information to our stakeholders on identified system weaknesses to proactively prevent fraud

Provide timely and effective counter fraud guidance to inform and enable a local counter fraud response

Develop a counter fraud culture across the NHS

Deliver a targeted webinar programme to inform and support our stakeholders in their counter fraud efforts

Establish and deliver a programme of face-to-face regional stakeholder liaison events to communicate and facilitate a counter fraud culture

Continue to maintain a quarterly bulletin for our stakeholders

Undertake a systematic Enterprise Fraud Risk Assessment to identify, assess, prioritise and mitigate potential fraud risks

In collaboration with our stakeholders, develop and agree effective action plans across identified priority areas of vulnerability

Ensure new systems, processes and major programmes adopted by the NHS have a counter fraud response from the outset

Provide expertise and collaborate with key partners to support the delivery of the appropriate counter fraud response

Strategic Pillar - Respond

Strategic objective – When we know that fraud has occurred, we are equipped to respond

Strategic actions over the life of the strategy (year 1 – 3)

- Use our understanding of fraud to develop a control strategy, agree priorities, develop action plans, manage strategic and tactical tasking of resources and close intelligence gaps
- Through developing a response to allegations of fraud we will prioritise prevention and disruption to reduce harm and loss
- We will conduct and support, criminal, financial and corporate investigations to establish whether a) fraud, bribery or corruption has occurred b) determine or influence appropriate action/sanctions and c) initiate recovery of funds lost
- We will provide support, advice and guidance to the counter fraud community to develop capability and capacity to respond to fraud
- We will develop our analytical capability to provide insight that presents patterns in data that are indicative of fraud

Key area of focus (year 2)

Deliverables

Bring the national and local counter fraud response together through the establishment and operation of the NHSCFA Fraud Hub

Embed and improve our Fraud Hub enforcement function, providing support and enabling an improved counter fraud enforcement response at a local level

Embed and improve our Fraud Hub prevention function to provide support and enable an improved counter fraud prevention response at a local level

Embed and improve our Fraud Hub stakeholder engagement and relationship management function to continue to develop a collaborative counter fraud community within the NHS

Embed and improve our Fraud Hub case management function, providing a case management process to capture and realise the activity and impact of all counter fraud activity in the NHS

Embed and improve our Fraud Hub internal training function, providing an ongoing learning and skill development capability to the NHSCFA

Strategic Tasking and Tactical Tasking
Coordinating Group

Coordinate and resource areas of activity agreed with key counter fraud partners to maximise impact across the NHS that will contribute towards the health group's financial achievements

Produce an agreed strategic action plan with key counter fraud partners to tackle priority areas of new and emerging fraud

Increase opportunities for prevention

Improved integrated response to intelligence and horizon scanning, data analysis and learning from enforcement

Tackle areas of fraud risk vulnerability by producing timely and effective Fraud Prevention Notices and Intelligence Bulletins to enable counter fraud action by our stakeholders

Work collaboratively with partners to provide assurance through shared resources, capabilities, and expertise

Provide an effective national counter fraud enforcement response

Where an instance of serious fraud, bribery and corruption is identified, undertake national enforcement activity to address the fraud

Achieve improved outcomes in the financial impact of NHSCFA enforcement activity

Continue to develop a highly skilled NHSCFA enforcement workforce through a robust programme of continuous professional development

Provide high levels of assurance relating to enforcement activity via a robust quality management system applied to investigations

Provide a responsive expert digital forensic capability to support criminal investigations in England, Wales and Scotland through a digital forensic unit operating framework and extending the current scope of accreditation

Deploy accredited financial investigators and financial intelligence officers to support the progress of criminal investigations across the NHS and utilise powers under the Proceeds of Crime Act to recover NHS funds obtained through fraud and return them to the NHS for the provision of patient care

Support enforcement activity at a local level

Support the NHS to improve the value of recorded financial outcomes realised from counter fraud enforcement work undertaken locally and enable health bodies to pursue all appropriate sanctions where fraud is identified

Innovate in the use of data

Proactively use data to deliver an innovative enhanced analytical capability which provides novel insights to identify patterns in data indicative of fraud

Strategic Pillar - Assure

Strategic objective – We can assure our key partners, stakeholders and the public that the overall response to fraud across the NHS is robust

Strategic actions over the life of the strategy (year 1 – 3)

- Measure, assure and report health bodies' compliance with the Government Functional Standard GovS 013 and NHS counter fraud requirements
- Provide a robust evidence base demonstrating the positive impact of the NHS counter fraud response and championing the work undertaken in the NHS counter fraud community
- Provide and manage a case management system and reporting tool for the NHS to ensure all counter fraud activity and outcomes are captured
- Provide assurance to the Department of Health and Social Care (DHSC) and the Public Sector Fraud Authority (PSFA) the reported information relating to fraud affecting the NHS (threat levels, response activity and measurable outcomes) have the highest level of validation and statistical integrity
- Lead the NHS counter fraud community to drive measurable improvements in the counter fraud response through collaborative partnerships
- Protect NHS funds through the reduction of vulnerability to fraud and reduction of losses
- Continued development of the NHS counter fraud community

Key area of focus (year 2)

Deliverables

Support compliance with the Government Counter Fraud Functional Standard

Enable and support health bodies to achieve and improve compliance with the Government Functional Standard 'GovS 013: Counter Fraud'

Access and report sector standards returns

Produce comprehensive and accurate information about standards returns, ensuring consistency and accuracy that reflects work undertaken by the sector

Develop and improve our Case Management System

Improve the intelligence functionality of our Case Management System to identify trends and aid dissemination

Continue to develop and provide detailed performance information across the health group to drive improvement activity

Provide assurance to the Department of Health and Social Care

Review and deliver compliance with the DHSC/NHSCFA performance framework

Incorporate the impact on counter fraud resulting from error and corrective action

Assess our stakeholder engagement

Assess our stakeholder engagement and demonstrate an improvement on the baseline established in 2023 to 2024 by undertaking targeted survey work, assessing qualitative feedback and observing performance outcomes

Assure against our governance

Assure ourselves against the requirements of the Govs 013 Functional Standard

Develop and deliver a Continuous Improvement and Assessment Framework to address any gaps in assurance

National and international collaboration enhances our role as the national body for NHS counter fraud

Continue to collaborate nationally with our Four Nations colleagues, share in best practice and responses. Strengthen relationships with our international partners in leading in health-related fraud prevention, enforcement and recovery

Strategic Pillar - People

Strategic objective – Supporting our people in an innovative and agile way to underpin and deliver counter fraud activity within the NHS

Strategic actions over the life of the strategy (year 1 – 3)

- A sustainable approach to workforce and succession planning aligned to our People and Workforce Development Strategy to include recruitment and retention initiatives, opportunities for learning and development and access to coaching and mentoring
- Building skills and capabilities to be future fit and recruiting in a smart and targeted way
- Investing in people to achieve a return on that investment
- Managing talent within the organisation and seeking new and emerging expertise where required
- Build on strong, safe, legal and best practice foundation to enable us to deliver a comprehensive, diverse and inclusive portfolio of people related activities
- Being a flexible and collaborative 'One Team' of professionals who are driven by our vision, purpose and values and behaviours in order to deliver, which is underpinned by personal performance

Key area of focus (year 2)

Deliverables

Make the best use of people and skills through strategic workforce planning

Enhance recruitment and onboarding processes, underpinned by monitoring and improvement metrics in each area as directed by the People and Workforce Development Strategy

Ensure the HR advisory is well-qualified, responsive, proactive, and collaborative

Embed and further develop the HR operating model and team/operational structures, contained in NHSCFA's People and Workforce Development Strategy in this financial year

Continue to simplify, streamline, and refine the number of HR policies and processes, ensuring consistent application

Develop visible, positive, confident, and enthusiastic leaders who exemplify our values

Identify any emerging gaps and develop the skills needed at different leadership and management levels and designing/ providing access to development as appropriate

Publicise and train the leadership and management model (Leadership Essentials) and continue to embed values and behaviours (LIFE), guiding their application in a supportive and inclusive programme

Deliver a workplace where people are proud of the work we do and feel included, valued and fairly and equally supported for their efforts

Pursue accreditations that evidence the NHSCFA as an employer that attracts and retains, creating a truly inclusive environment appropriate to the modern workplace.

Implement the NHSCFA Wellbeing Strategy for our people.

Deliver a refreshed performance management structure that sets clear and fair expectations, supported and informed by organisational health and management data to aid delivery and decision making

Continue to embed the competency and behaviour framework underpinned by our LIFE Values and Behaviours Framework

Review and improve the provision of the people related performance data made available to management, ensuring it is being used to support improvement

Introduce and embed our succession planning process, identifying skills gaps and potential talent for development

Personal and professional development for all staff to build on existing potential

Embed and improve the use of technical education and development, exploring the use of technology, delivering an inclusive, engaging and cost-effective way to build skills and capabilities

Strategic Pillar - Resources

Strategic objective – Ensuring we use our resources in an innovative and agile way to support and deliver counter fraud activity within the NHS

Strategic actions over the life of the strategy (year 1 – 3)

- Ensure access to flexible contract and procurement support
- Develop a flexible approach to strategic, business and resource planning
- Develop the right working partnerships regardless of the sector they are from
- Develop a sustainable long-term financial plan
- Develop mechanisms that demonstrate return on investment
- Understand and enable all appropriate routes for counter fraud activity to take place
- Prepare for future delivery and changes in counter fraud approaches
- Ensure our IT infrastructure, systems and people are developed to ensure maximum business impact
- Adhere to and develop our governance and assurance practices
- Ensure our IT will fully support our operational delivery and future ambitions around advanced analytical capability
- Ensure our IT will protect the NHSCFA from risks, threats and vulnerabilities we face from cyber-attacks
- Continually explore technology to enable business success

Key area of focus (year 2)

Deliverables

Enable and support procurement

Ensure the organisation has appropriate access to a procurement process, providing support as requested

Develop and implement an appropriate future model to ensure timely access to legal and contractual support

Deliver the NHSCFA integrated business planning process

Deliver a flexible business planning approach, emphasising the incorporation of a lessons learned process

Use our data to inform key decision making; enhancing and transforming the way we use information in the organisation

Review our priorities to support our planning and strategic delivery and ensure delivery and accountability for action taken within this plan

Define the process to develop and deliver our new strategic delivery for 2026 to 2029 during this business planning year

Enhance our approach to prioritisation through the integrated planning approach

Embed our Design Authority within the establishment and management of our key projects and programmes

Establish and enhance our Return On Investment (ROI)

Embed the developed model to quantify the organisation's Return On Investment (ROI) in countering fraud and enabling services

Demonstrate business line reporting to enhance ROI from base line reporting to improve decision making

IT infrastructure and optimised business solutions

Embed and optimise technology infrastructure and scope, develop, and deliver new business solutions to deliver a transformed and agile technology service

Continue to review our technology environment to support and optimise the delivery of our Digital Strategy

Continue to provision technical solutions to benefit and enhance business needs

Identify the cyber security threats the NHSCFA faces, learn from attempts made to compromise systems, and those prevented

Exploration of new and emerging technologies to support effective and efficient operational delivery

Implement the supported recommendations following completion of the Technology Review

Continue to develop and implement our Customer Relationship Management (CRM) system

Strengthening our governance

Delivery of our governance and audit requirements

Take a risk-based approach to our assurance practices

Continue the development of 'supporting our governance' processes / management functions

Demonstrable improvement in the timely implementation of audit recommendations

Strong financial management and controls

We will manage our existing budget and strive to secure additional funding to support improved financial outcomes across the counter fraud community

We will develop and implement organisational cost improvement programmes if required

We will maintain our sustainable long-term financial plan, developing it further as required

In partnership with internal and external stakeholders, support business cases development in preparation for funding opportunities

Deliver a robust performance programme and project management across the NHSCFA

Deliver and promote a service catalogue that outlines the service and capabilities offered by our Project Management Office (PMO) to support the delivery of our strategic objectives

Focus on improving the mobilisation of projects and the delivery of capabilities and benefits

Develop and enhance the organisations PMO Competency Framework to enable delivery, strategy and capability

Continue to develop practices, people, tools and knowledge across the NHSCFA

Transformation to benefit countering fraud in the NHS

Facilitate the continued transformation of the NHSCFA to maximise impact on fraud within NHS and wider health sector

Delivery of an agile and fit for purpose infrastructure for the NHSCFA

Collaboration with stakeholders

Deliver strategic and operational corporate communications

Continue to provide strategic and operational communications support to the NHSCFA

Embed and improve a targeted fraud-focused communications strategy for our stakeholders

Establish and improve systems and processes to ensure effective delivery of communications both internally to our people and externally across the sector to support organisational deliverables

Optimise the physical and virtual environment where our people work

Deliver an efficient use of space, resources and technology to enhance productivity and collaboration

Manage the policies, procedures and practices that prioritise the wellbeing of individuals, the prevention of accidents or incidents, and the protection of the environment

Agree and implement strategies and procedures to ensure the NHSCFA can continue its essential functions and recover quickly from disruptions

Introduce and embed policies, procedures and practices to meet social responsibility requirements

Accountability and performance delivery

Our annual business plan supports the delivery of our strategy year-on-year. The NHSCFA has a framework underpinning its business planning cycle and subsequent performance management and delivery assurance. Quarterly strategic accountability meetings with the Department of Health and Social Care (DHSC), attended by the NHSCFA's chair and chief executive officer, provide an opportunity to discuss progress against our objectives and targets.

Our strategy sets out our direction in line with the delivery of the strategic pillars of the organisation. Delivery of these is discharged through this business plan. The plan is then supported by divisional and unit business plans to ensure a golden thread and alignment across the organisation's plans. This plan will be actively managed and monitored through a robust performance management framework, with at least monthly consideration of performance at Executive, Senior Management Team, Leadership and unit-level performance reporting.

NHSCFA Board level performance reporting will take place on a quarterly basis together with a portfolio report on the delivery of our key projects and programmes. The transparency of our board reporting is underpinned by quarterly Performance and Assurance Panels, where delivery and performance across the entire organisation is reviewed by the panel with associated metrics to demonstrate impact and value to counter fraud.

The heads of service for each division, along with their management teams, actively engage in this process of delivery assurance and mitigation. The panels are chaired by the director of performance and improvement, who directly escalates any key issues, concerns, or risks to the Senior Management Team (SMT), chief executive officer and board secretary. Escalated delivery and performance risks are considered by the SMT in the first instance. The mitigations against these and all other strategic risks are regularly reviewed as part of our risk management framework and are reported to the ARAC.



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