

NHSCFA 2020-2021 Business Plan

October 2020





Foreword by the CEO Sue Frith

Welcome to our NHSCFA 2020-21 business plan which sets out what the NHSCFA will deliver this year.

As a special health authority focussed entirely on NHS counter fraud work and independent from other NHS bodies, the NHSCFA is directly accountable to Ministers through the Department of Health and Social Care (DHSC).

The impact on the NHS from the Covid 19 pandemic has been huge and I would like to thank all of our colleagues across the NHS for their hard work and dedication at such a difficult time. Covid 19 has also had an impact on the NHS fraud landscape; criminals will always take advantage of crisis situations. As the NHS faces possibly the greatest challenge since its creation, at the NHSCFA we have been doing all we can to support our colleagues on the frontline of the NHS. We have focussed our fraud work on the changes to the fraud threats, vulnerabilities, and enablers associated with Covid19, identifying and sharing that risk information with our NHS counter fraud colleagues. We have reviewed and updated our plans to address those risks alongside continuing to deliver our existing counter fraud work to shield the NHS from fraud. We have supported key Covid 19 workstreams - procurement of Personal Protective Equipment and the new Test and Trace programme - with counter fraud resource and expertise.

Since our launch in November 2017 the NHSCFA has delivered on the commitment made to Ministers to reduce fraud in the NHS by £300m by 2021. This was reached in 2019 through collaborative work with our NHS partners, the dedicated innovative

work of our specialist counter fraud teams and the support of our Board and the Department of Health and Social Care sponsor.

However, with an estimated annual loss of over £1.2bn NHS fraud remains a significant risk and we cannot be complacent. Fraud against the NHS is particularly despicable as it diverts precious resources from patient care and negatively impacts the health service's ability to meet people's needs. As fraud is a hidden crime, we will remain constantly vigilant in our review of fraud risks, we will continue to improve our understanding of how the fraud landscape is changing and identify where we can make the most impact to protect the NHS and reduce financial loss.

To do this the NHSCFA regularly reviews the available intelligence to draw a strategic picture of fraud across the NHS and identify key thematic fraud risk areas. This information is used to not only assess fraud risk and estimate the value of loss, but also to understand in more detail the threats, vulnerabilities, enabler to fraud across the whole system. It is essential that the NHSCFA understands the capability within the system to effect change so that we can innovate and offer counter fraud solutions that support the NHS to implement best practice to prevent fraud loss.

Innovation is key to the development of action to tackle fraud. The NHSCFA will develop and deliver collaborative intervention with NHS organisations. We will tailor this approach to support NHS organisations and help them identify and address local fraud risks effectively. We will provide opportunities to share local and

national counter fraud expertise and work in collaboration with the NHS to support the development of value for money counter fraud services. Most importantly we will innovate change that encourages and mobilises local and national fraud resources to tackle risk in partnership.

In 2019-20 working in partnership across the NHS the NHSCFA successfully delivered against its first financial target of £127m. By directing resources at high risk areas, we were able to prevent and detect fraud and recover monies to be re-invested in NHS care.

The new NHSCFA three-year strategy sets out our commitment to meet a £400M fraud detected, prevented and recovered target, and this business plan describes the first year of our delivery against that target. The impact of the pandemic makes this challenging but through our integrated approach to planning we are in a strong position to identify and anticipate where fraud loss can be identified, and savings realised.

In 2020-21 our plan is to deliver a minimum of £50m against our overall target and to do this our focus will be on a number of priority areas.

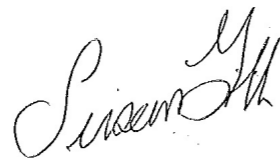
- We will continue to support the DHSC and the NHS to tackle Covid 19 related fraud
- We will work with partners to develop a targeted approach to tackle Agency fraud.
- We will continue our measurement and analytical work in Procurement, specifically post Covid 19 assurance and assess the fraud taking place in the pharmaceutical area.
- We will continue to address fraudulent

activity within Help with Health Costs with our partners the NHSBSA.

- We continue to progress work to ensure that monies with general practice are not lost to fraud and the allocation is distributed fairly and effectively using a range of methods to understand and highlight areas of concern.

We will identify savings by preventing loss or reducing vulnerability to fraud across all these areas.

To achieve our strategy commitments, we need every individual and every organisation to take responsibility for finding and fighting fraud. This is a challenge and one we share with the wider public sector. We will work with partners across government, the NHS and the public sector to deliver the NHSCFA's commitment to reduce financial loss to the NHS from fraud.



Sue Frith
Chief Executive Officer



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Our vision - what we are aiming to achieve

Our vision is to lead and proactively support the NHS to understand, find, prevent and respond to fraud.

Our purpose

Our purpose is to:

- Provide leadership and expertise in counter fraud as a valued NHS partner
- Collaborate nationally and locally with the NHS to understand fraud threats, vulnerabilities and enablers
- Deliver intelligence-led counter fraud services to find, respond to and prevent fraud
- Reduce the impact of fraud on the NHS
- Work with partners to deliver financial savings that can be reinvested in patient care

What we will achieve

Our ambition is that in three years' time we will be:

- Recognised for pioneering counter fraud initiatives that deliver real savings for the NHS
- Spearheading the fight against fraud in the NHS
- A valued partner for the whole NHS in fighting fraud, with leaders at national and local level looking to us to innovate and provide knowledge and expertise
- Recognised internationally as a leader in finding and fighting healthcare fraud

Our strategic objectives

To achieve our vision, we have identified four strategic objectives which will translate our ambitions into delivery:

- We will lead and influence the NHS to find, prevent, and reduce fraud, recovering losses and putting money back into patient care
- We will work with partners to reduce fraud loss in the NHS
- We will support and empower our people to be the best in their roles and feel valued
- We will effectively use our resources, identify and pursue opportunities for growth and innovation and reduce our operating costs

Our annual integrated planning approach will ensure that we are doing the right things. This approach will allow us to be dynamic and flexible to ensure our objectives adapt and anticipate the changing environment. This includes the emerging fraud risks, especially considering the COVID 19 pandemic and its impact globally and nationally on our economy and society.

This business plan sets out our programme of work for 2020-2021 and how we will work with our partners to achieve it.

At a glance - our successes by 2023

1. Lead and influence

- More people understand NHS fraud, are engaged with the counter fraud agenda and report fraud
- A network of fraud champions is embedded in NHS providers
- All NHS organisations are supported in achieving compliance with the Government Counter Fraud Functional standard
- Membership of the Government Counter Fraud Profession is available to the whole NHS counter fraud community in England, with all eligible professionals empowered and supported to become members
- Our stakeholders have high levels of satisfaction in the services we provide

2. Reduce fraud loss

- National and local counter fraud activity will result in measurable financial benefits
- We have a process to measure value for money in local counter fraud functions for both proactive and reactive counter fraud work
- Targeted intervention by the NHSCFA in partnership with health bodies and counter fraud providers will have delivered measurable results
- Data and technology drive efficiencies in how we work and innovate our services

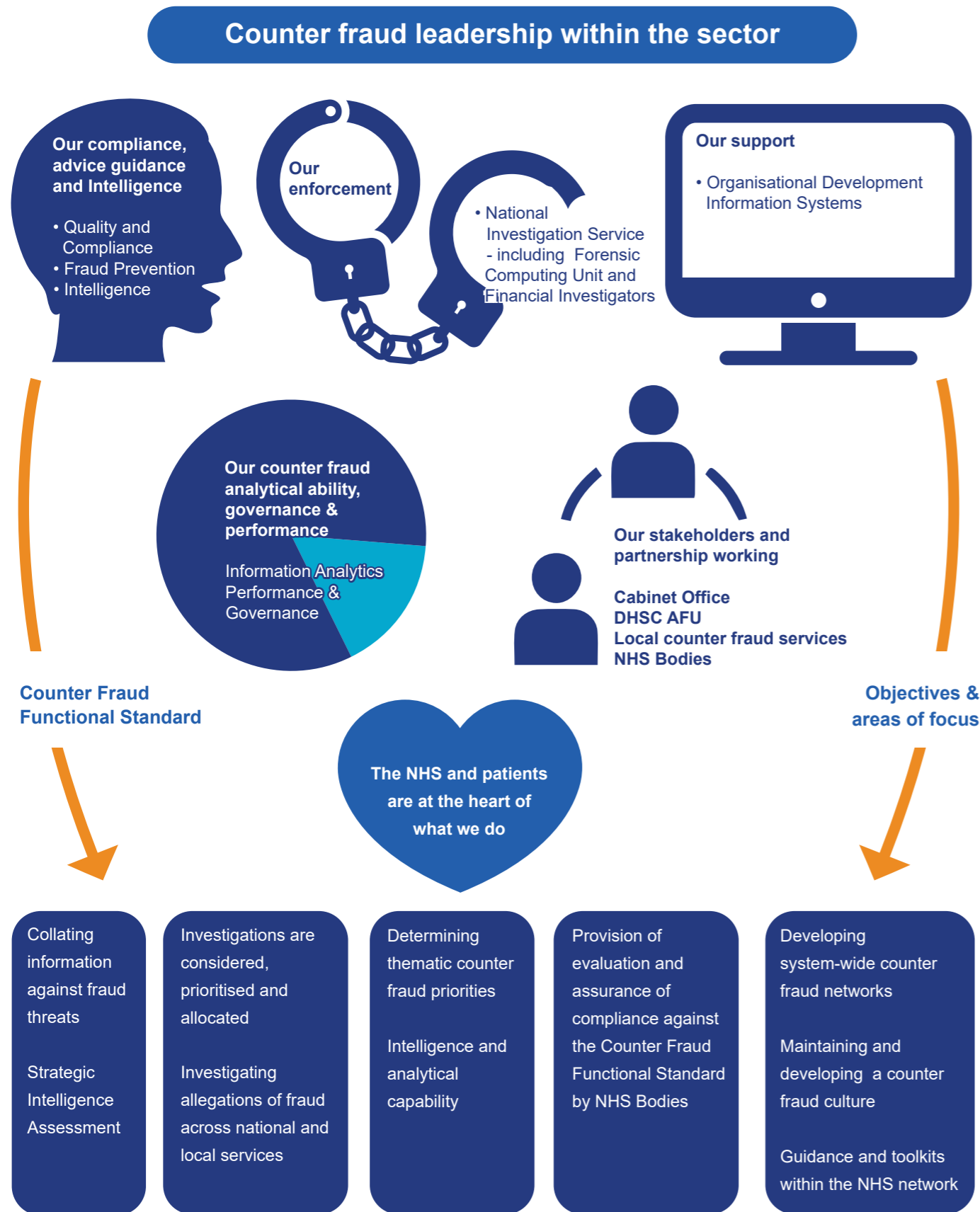
3. Support and empower our people

- We will demonstrate the benefits of adopting smarter working principles
- Leaders are seen to create an open, empowering and supportive culture, where people feel they add value and are treated fairly
- Our people have access to the training and development they need
- Equality, diversity & inclusion and mental health are promoted and supported in the workplace

4. Effective use of our resources

- We consistently deliver financial balance by integrated alignment of financial, business and workforce, translating our strategy into effective and resourced deliverables
- We have effective performance and project management approaches to drive delivery of our priorities
- All opportunities to secure additional funding and investment are identified & pursued
- We have lower operating costs through rationalisation of our estate, ensuring accommodation is of a high standard but reduced in size where appropriate
- We will work with NHS partners to develop shared programmes of intervention including identifying opportunities for income generation

Our Business Model



Our integrated approach to successful delivery

This plan details the high level programme of work the NHSCFA will implement during the first year of our three year strategy. This includes working with partners to reduce the financial loss to fraud within the health sector by a minimum of £50m this year and utilising a network of trained investigators across the NHS to realise a direct financial value of enforcement activity exceeding a minimum value of £25m. This plan has been developed in line with the Secretary of State for Health's priorities, i.e. we will embrace technology to facilitate smarter working principles allowing for a more flexible working environment for our people whilst continuing to utilise data to identify areas for collaborative prevention activity across the health sector to strengthen the controls against fraud.

Financial assumptions

The delivery of this business plan is supported by financial planning that includes some key assumptions. We will deliver against cost improvement plans (CIP) in year, that the NHSCFA annual parliamentary funding allocation remains at £11.3m for financial year 2020/21, that there will be no further changes in service delivery requirements outside of the current plans and that there are no further cost pressures above the current growth and inflation assumptions.

We have made considerable progress and achieved a range of successes during the period of our previous strategy (2017-2020). We now face a unique set of challenges and opportunities over the

lifespan of the strategy and beyond. To fulfil our ambition for our organisation we require an integrated strategic approach. This will ensure that all our strategies around estates, finances, digital, data, service provision, business planning and workforce are aligned.

Our Integrated Approach

Development of an integrated three-year planning cycle in line with the delivery of the strategy is essential to this. We also need to identify our key projects and programmes and deliver them through a consistent organisational approach and common standards.

The Strategic Intelligence Assessment (SIA) details the key fraud threats, vulnerabilities and enablers within the NHS. With limited resources at our disposal, the SIA assists us in identifying which priority areas should be our focus for the period of the strategy. The SIA 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.

The Strategic Intelligence Assessment, Control Strategy and integrated planning cycle will inform our work to achieve the financial targets set over the lifespan of the strategy. This will be a mixture of direct savings from NHSCFA activity and wider savings due to behaviour change through our fraud prevention, recovery and assurance work.

With the response to COVID-19 dominating the work of the NHS during 2020, issues relating to the pandemic will feature heavily in our annual plans including the following in particular:

- An increase in funding for the procurement of goods and services, with a reduced level of scrutiny during this period, means that vulnerabilities remain and potentially have increased. Procurement fraud will continue to be a key area of focus for the NHSCFA for the life of this strategy, with COVID-19 post event assurance underpinning this work in 2020-21.
- The dynamic nature of people deployment within the NHS has been identified as a fraud vulnerability, therefore the NHSCFA will prioritise fraud prevention activity in relation to agency and bank staff during 2021-2023.
- Continued collaboration with the NHSBSA and access to data has highlighted key areas for analysis for fraud taking place during 2020-21. Targeted prevention activity will take place during 2021-2023.
- Work will continue in key areas such as fraud taking place in general practice in 2021-22, with updated analysis on Help with Health Care Costs (patient fraud) in 2022-23.

Our control strategy will be aligned to a 3-year planning cycle and support the delivery of our financial targets of £400 million as a result of national and local counter fraud activity (fraud prevented, detected and recovered).

NHSCFA will also develop a range of innovative and exploratory interventions to support the prevention and detection of fraud by combining technology, machine

learning and analytical techniques over the lifecycle of the strategy. The areas that will be targeted although not restricted to are NHS staff E-rostering and procurement. In addition, NHSCFA are in the early stages of planning an NHS Counter Fraud Hub in order to provide a focal point with responsibility for coordinating, enabling and advising the Local Counter Fraud function. 2020/21 will see the development of funding bids and planning to take these initiatives forward during 2021-23.

2020-2021 Delivery Plan



2020-21 Strategic Objectives	Core Work Streams	KPI/Key Deliverables
<p>We will lead and influence the NHS to find, prevent and reduce fraud, recovering losses and putting money back into patient care.</p>	<p>Building on the work completed in 2018-19 and 2019-20, we will work to increase the engagement across the health sector to build counter fraud capability and support NHS organisations to evolve and develop better understanding of their fraud risks, vulnerabilities and threats.</p>	<p>25% of those eligible for membership within the NHSCFA and 10% of the LCFS community will be members of the Government Counter Fraud Profession.</p>
	<p>Improving quality of fraud reports received by the NHSCFA.</p>	<p>The NHSCFA will provide its counter fraud expertise and resource to NHS Test and Trace – to develop an understanding of inherent fraud risks and vulnerabilities, and to establish an appropriate counter fraud resource and response.</p>
		<p>The NHSCFA will continually assess new and emerging threats to the NHS during the pandemic and publish regular threat assessments for action by our stakeholders and partners.</p>
		<p>The NHSCFA will provide its counter fraud expertise and resource to support the DHSC in the review of due diligence in relation to PPE and associated procurement during the COVID-19 response across the NHS.</p>
		<p>The number of referrals converted into reports in the case management system will increase by 4% by end of 2020-21. Reports converted/promoted to investigations will also increase by 4%.</p> <p>CLUE3 implementation /roll out to LCFS’s NHSE/I, NHSBSA and DHSC AFU completed by the end of March 2021.</p> <p>FCROL Review completed in line with CLUE3 implementation timescales in relation to usability and logic, to enhance fraud reporting experience of those reporting and in turn increase the numbers of referrals received.</p>

2020-21 Strategic Objectives	Core Work Streams	KPI/Key Deliverables
<p>We will work with partners to reduce fraud loss in the NHS.</p>	<p>Intelligence Development and Fraud Prevention strategies primarily focussed on</p> <ul style="list-style-type: none"> a) Measuring the impact of NHSCFA Fraud Prevention Guidance and Advice b) Undertaking Loss Analysis work to inform our intelligence picture c) COVID-19 Procurement Post Event Assurance d) Identification of the reduction in vulnerability to losses to fraud. 	<p>Reduce losses to fraud within the health sector by contributing to the overall three year target of £400m. In year delivery of £50 million as a result of the change in focus.</p>
	<p>Measuring the impact of NHSCFA Fraud Prevention Guidance and Advice.</p>	<p>Design, develop and deliver a compliance exercise to measure impact of fraud prevention guidance issued as part of the 2019-20 Procurement fraud NPE and Fraud Prevention Notices.</p> <p>Deliver on savings identified from compliance exercise, impact of fraud prevention work and prevention savings at local level as a result of activity and directed work undertaken by the LCFS community.</p> <p>Identify savings of a minimum for fraud prevention activity of £5 million from 18/19 & 19/20 FPNs.</p>

2020-21 Strategic Objectives	Core Work Streams	KPI/Key Deliverables
	Undertaking Loss Analysis work to inform our intelligence picture.	<p><u>Help with Healthcare Costs</u> Undertake a measurement exercise to determine the current losses in prescription charge evasion.</p> <p>We will also undertake a thematic assessment on the effectiveness and vulnerabilities within the Real Time Exemption checking initiative.</p> <p>Fraud taking place in the pharmaceutical area - We will be undertaking a loss measurement exercise to determine the vulnerabilities within specific areas to inform targeted prevention activity in 2021-22.</p>
	COVID-19 Procurement Post Event Assurance.	<p><u>Procurement Fraud</u> Increase understanding in specific areas of local NHS procurement, identifying the threat of fraudulent activity and delivering a reduction in vulnerability as a result.</p> <p>Obtain a baseline for local NHS fraud risk on Covid-19 procurement spend and develop targets for reduction of the risk in 2021-22.</p> <p>Deliverables for 2020-21</p> <p>Design and develop, a national proactive exercise directing NHS provider organisations to undertake a Covid-19 Post Event Assurance activity focusing on the four PPNs (Part A) and PO vs non-PO spend (Part B), deliver the exercise in 2021-22.</p>

2020-21 Strategic Objectives	Core Work Streams	KPI/Key Deliverables
	Identification of the reduction in vulnerability to losses to fraud.	<p><u>Fraud taking place in General Practice</u> Deliver analysis of fraud taking place in general practice, increasing confidence in the fraud loss assessment to form a basis for a prevention strategy. The analysis and identification of vulnerability will be measured in 2021-22.</p> <p>Deliverables for 2020-21</p> <ul style="list-style-type: none"> Secure data by the end of Q4 Explore opportunities with the NHSBSA to analyse anomalies in the data this year. <p><u>Agency Fraud</u> To identify the threat of fraudulent activity in agency staff spend and work with stakeholders in tightening controls and reducing fraud vulnerability.</p> <p>Deliverables for 2020-21</p> <ul style="list-style-type: none"> Complete the TVE Assessment incorporating recommendations on fraud prevention solutions to reduce losses in agency fraud. Engage with service owners and stakeholders to develop a Fraud Response Action Plan.
	NHSCFA Investigations	Direct Financial Value of enforcement activity across the NHSCFA, local counter fraud provision and other arm's-length bodies will be a minimum of £25m a year.
	LCFS Outcomes	Value of reactive enforcement activity by local counter fraud functions will represent a 2:1 return on investment.

2020-21 Strategic Objectives	Core Work Streams	KPI/Key Deliverables
<p>Enable our People to be the best in their roles and feel valued.</p>	<p>Continued alignment with the Places for Growth Programme.</p> <p>Targeted leadership training programme.</p> <p>Promote equality, diversity and inclusion in our workforce, applying clear, fair and consistent policies.</p>	<p>100% of our people will have successfully adopted smarter working principles by 2020-21.</p> <p>The development of a sustainable workforce plan aligned to the delivery of our Strategy and objectives.</p> <p>90% of our people will receive Learning and Development programmes.</p> <p>We will observe a 10 percentile point improvement in how well people feel they are being led.</p> <p>An increase of 10% in Our People Satisfaction rating.</p> <p>Develop a Management Information Reporting Dashboard including organisational health metrics around equality, diversity and inclusion for reporting in Q4.</p>

2020-21 Strategic Objectives	Core Work Streams	KPI/Key Deliverables
<p>We will effectively use our resources, identify and pursue opportunities for growth and innovation and reduce our operating costs.</p>	<p>Identify and explore opportunities to secure additional funding and investment by demonstrating positive financial impact.</p> <p>Work with NHS partners to develop shared programmes of intervention, including identifying opportunities for income generation.</p> <p>Integrate financial, business and workforce planning, translating our strategy into effective, resourced deliverables.</p> <p>Develop effective performance and project management approaches to drive delivery of our priorities.</p> <p>Reduce operating costs through review and rationalisation of estates to embrace and reflect new ways of working.</p> <p>Application of good governance arrangements.</p>	<p>We will achieve best financial outcomes in investment and income generation.</p> <p>Project and Programme Management Approach agreed and implemented The impact and delivery of corporate projects will be measured to ensure return on investment is maximised and benefits are realised, through robust governance and assurance structures</p> <p>95% of corporate projects delivered on time and to budget.</p> <p>We will successfully reduce our estate by 10% in 2020-21.</p> <p>Reduce costs of travel and subsistence by 20% against the 19/20 baseline.</p>

Our Portfolio of Key Corporate Projects

Through our Business Planning Refresh process during late summer in response to COVID-19, the following have been identified as the key projects for the Organisation scheduled for delivery /commence during 2020-21. An overarching Portfolio dashboard highlight report will be produced for regular and timely updates to SMT, Board and ARAC.

2020-21 Objectives	Key Corporate Project/Programmes (s)
Lead and influence the prevention, detection and reduction of NHS Fraud and recover financial loss for the Health Sector to invest in patient care.	<ul style="list-style-type: none"> • Organisation Wide Engagement and Stakeholder Management including LCFS Service Improvement Initiatives (Local Embedded Teams Pilot) (scoping stage). • CLUE3 Implementation across the Sector (underway). • Extranet Development (underway).
We will work with partners to reduce fraud loss in the NHS.	<ul style="list-style-type: none"> • Loss Analysis Help with Health Costs (underway). • Loss Analysis Help with fraud taking place in the pharmaceutical area (underway). • Fraud taking place in general practice (Core project) continue into 2021/22 (underway). • Post Covid-19 Assurance (initiation stage).
Enable our People to be the best in their roles and feel valued.	<ul style="list-style-type: none"> • Workforce Strategy (underway). • Workforce Management Information Dashboard (underway). • Delivery of the People Plan (Multi-strand projects including the Diversity & Inclusion Action Plan) (underway.) • Smarter Working (underway).
Effective Use of Our Resources .	<ul style="list-style-type: none"> • Development of NHSCFA Project and Programme Approach (underway). • Income Generation Feasibility Project in relation to areas to be explored for cost recovery or commercialisation of activities including Forensic Computing Unit, Training and Development (scoping stage). • Innovation Projects covering Machine Learning, NHS Counter Fraud Hub & Rostering (scoping stage, awaiting approvals).

Accountability & Performance Delivery

Our annual business plan supports delivery of our strategy year on year. The NHSCFA has in place a framework in terms of its business planning cycle and subsequent performance management and delivery assurance. Quarterly strategic accountability meetings with the 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 key performance indicators that have been developed in line with delivery of the three strategic objectives of the organisation. Delivery of these are 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 closely managed and monitored at Board and Executive level through a Board level performance report and Portfolio Dashboard Report for our key projects and programmes. The transparency of our Board reporting is underpinned by quarterly Performance and Assurance Panels where delivery and performance across all four Divisions of the organisation are reviewed by the Panel. The Heads of Service for each division along with their management teams actively engage in this process of delivery assurance and mitigation. These 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 and Board Secretary. The management decision making forum on all escalated

delivery and performance risks is 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 Audit and Risk Assurance Committee.