

Tactical Tasking and Coordination Group Policy

August 2019

Version 0.3



**NHS fraud.
Spot it. Report it.
Together we stop it.**

Version control

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1. Purpose

- 1.1** The Tactical Tasking and Co-ordination Group (TTCG) is the process by which NHSCFA formally considers cases for the adoption of criminal investigations, the most appropriate resource to undertake these, and alternative disposals. The TTCG will also undertake reviews and consider outcomes of previous cases and where appropriate identify lessons learned for further dissemination. The process is undertaken within the confines of existing operational budgets.
- 1.2** Tasking and Co-ordination provides transparency in the identification of priorities and the deployment of resources in a measured manner. It ensures that all cases have a clear designation and direction upon formal adoption.

2. Accountability, governance and membership

- 2.1** The TTCG shall be chaired by an appointed member of the SMT who will be accountable for the allocation of resources between units towards the achievement of NHSCFA tactical priorities. Governance of this group is through the SMT. The TTCG is structured so as to reflect the contributions required from operational personnel to the decision making process. The TTCG will comprise:
- SMT member (chair).
 - National Investigations Manager.
 - Fraud Prevention Team Manager.
 - Central Intelligence Lead.
 - Minute taker.
 - Invited guests/specialist when required.
 - A representative of the Department of Health and Social Care Anti-Fraud Unit (DHSC AFU) will be invited as an observer.
- 2.2** The Chair is accountable for the timely and quality decision making of the TTCG. The chair of the TTCG must also ensure that, in the application of this policy, any action taken is legal, proportionate, necessary and sufficient. The use of deputies should be exceptional.

3. Process

- 3.1** The TTCG should meet once a fortnight prior to SMT Meetings. The timing of these meetings should be fixed to support a culture of timely reporting to the TTCG. Where intelligence is immediately actionable and requires the urgent deployment of resource, a meeting of the TTCG can otherwise be called. In time critical cases where a decision would normally be made by TTCG, The chair will make a decision and this will be reviewed at the next available TTCG.
- 3.2** The IIU will provide a 'Tactical Intelligence Assessment' to the TTCG at least 24 hours ahead of their meeting. Items for inclusion in the Tactical Intelligence Assessment developed outside of the IIU should be forwarded to the IIU (Central Intelligence) at least 48 hours ahead of the meeting of the TTCG to allow for incorporation. It is the sole responsibility of those seeking to have matters to be discussed at the TTCG to provide these to the IIU in advance of any meeting. With the exception of rare urgent issues, The TTCG will only consider those matters included in the Tactical Intelligence Assessment.
- 3.3** No matters within the vires of the Department of Health and Social Care Anti Fraud Unit (DHSC AFU) will be subject to a Tactical Intelligence Assessment. These matters will be referred directly to the DH AFU.
- 3.4** No matters relating to the professional conduct or alleged criminal actions of NHS CFA staff will be subject to a Tactical Intelligence Assessment. These matters will be referred directly to the Chief Executive Officer of the NHSCFA (or if the CEO is the subject of the allegation, to the Chair of the NHSCFA).
- 3.5** The Tactical Intelligence Assessment will comprise of:
- A summary of packages compiled by the IIU that require designation.
 - A summary of LCFS cases forwarded to NHSCFA for research, development and, or investigation.
 - A summary of NIS cases that require cross unit resourcing decisions.
- 3.6** Each item featuring in the Tactical Intelligence Assessment will contain the following information:
- The operation name or information report URN
 - The NHSCFA business unit responsible for the intelligence case

- The name of the intelligence case owner
- A brief summary of the intelligence case
- Whether or not a briefing is required
- The name of the Presenting officer
- Any relevant comments from the IIU officer compiling the Tactical Intelligence Assessment.

3.7 The format for the Tactical Intelligence Assessment is attached as Appendix A.

3.8 It will not always be possible to fully explain complex matters in the Tactical Intelligence Assessment. In these circumstances the Tactical Intelligence Assessment will need to be supported by presentation of facts and inferences by person with knowledge of the intelligence case who does not sit on the TTCG. Briefings should aim to be delivered in around 5 to 10 minutes.

3.9 The Tactical Intelligence Assessment will be disseminated to the TTCG with all intelligence packages referred to within attached.

4. Intelligence case review

4.1 The tactical assessment will form the basis for discussion amongst the TTCG who will consider the intelligence case and decide upon designation.

4.2 It is the responsibility of the TTCG to rigorously scrutinise the intelligence case and scrutinise the intelligence case and assess if any fraud or bribery is evident. In reaching all designation decisions, the TTCG will need to take account of the following:

- NHS vires
- NHSCFA case acceptance criteria
- The nature and scale of the identified threat
- NHSCFA Strategic Intelligence Assessment and prevention, enforcement and intelligence priorities
- Headline priority project work undertaken against NHCFA organisational priorities

- NHSCFA tactical resource capability and availability
- Money laundering offences

4.3 The TTCG can make recommendations to the Senior Management Team (SMT) to make a Strategic Tasking decision to review and revise prevention, enforcement and intelligence priorities. In these circumstances a formal referral will be made to the SMT and any decision by the SMT on resource allocation and preferred action to be taken be formally and in writing referred back to the TTCG for reference.

4.4 Upon review of a case, the TTCG can make the following recommendations:

- That the matter, owing to the complexity or another reason detailed in the Case Acceptance Criteria, should be investigated by NIS now (NIS) and allocate to the Fraud Investigation Lead
- That the matter needs to be investigated by NIS, but there are insufficient resources to undertake the investigation at this time (PENDING)
- That the matter should be referred to an LCFS (LCFS)
- The matter should be transferred to a non-NHS organisation (TRANSFER)
- The matter should be referred to or referred back, to the IIU for development (IIU).
- If referred to NIS consideration should be given to the potential for authorising a Financial Investigation or Money Laundering Investigation.

A record of all decisions and key discussions will be made in the TTCG decision log (Appendix B).

4.6 THE TTCG will try at all times to reach consensus. In exceptional cases, an executive decision may be taken by the Chair.

4.7 If a case is accepted for investigation by NIS, a tactical resolution should be developed, to include:

- Resource plans
- Technical requirements, and
- An operational plan.

4.8 Process flows for the Tactical Tasking and Co-ordination Group process are illustrated at Appendix C.

5. TTCG progress reviews

- 5.1** The TTCG will review cases that have been previously allocated by them. TTCG progress reviews will principally focus on those issues of greatest harm to NHSCFA, the NHS or NHS England.
- 5.2** The purpose of these reviews is to:
- Allow for previous decisions to be re-evaluated in line with the current NHS CFA Strategy
 - Evaluate progress
 - Ensure appropriate resourcing going forward.
- 5.3** It is not the responsibility of the TTCG to direct investigations or make investigative decisions.
- 5.4** Cases allocated to NIS will be reviewed initially three months following allocation, then at a period determined at this initial review.
- 5.5** All NIS closed case reports will be reviewed by the group.
- 5.6** Operational case reviews to be conducted by the TTCG will be listed in the Tactical Intelligence Assessment and updated upon in the TTCG Decision Log.
- 5.7** It is the responsibility of the Chair of the TTCG to identify which cases require review, and to make arrangements as to the format and personal required to provide update.

6. Appendices

Appendix A. Tactical Intelligence Assessment

OFFICIAL-SENSITIVE (May change when content added)

Tactical Intelligence Assessment

Period:

| Ref | Unit Source | Owner | Summary of Intelligence case | Briefing | Presenter | Comments | Attachment |
|-----|-------------|-------|------------------------------|----------|-----------|----------|------------|
| | | | | | | | |
| | | | | | | | |
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Appendix B. TTCG Decision Log

| TTCG Decision Log | | Decision date: | |
|-------------------|-------|----------------------------|-------------------------|
| Ref | Owner | Summary / Tasking Decision | FOR ADMIN PURPOSES ONLY |

| Ref | Owner | Summary / Tasking Decision | Action Required by TASKING: |
|-----|-------|----------------------------|---|
| | | | <input type="checkbox"/> Retain in CIU <input type="checkbox"/> Disseminate to LCFS <input type="checkbox"/> Disseminate to NIS <input type="checkbox"/> Other (please define) |
| | | | For admin use on dissemination: |
| | | | Dissemination to: |
| | | | Dissemination date: |
| | | | Team: |
| | | | Officer: |
| | | | FIRST Ref: |

OFFICIAL

| | | | |
|---|--|--|------------------------|
| LCFS Information reports | | | Admin action required: |
| | | | Admin action taken: |

| | | | |
|------------|--|--|------------------------|
| AOB | | | Admin action required: |
| | | | Admin action taken: |

Date of next TTCG: DD/MM/YYYY

Appendix C. Tactical Tasking and Co-ordination Group Process Flow Chart

