



Fraud Prevention Policy

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CONTENTS

1 INTRODUCTION..... 3

2 PRINCIPLES 3

3 THE POLICY 3

4 INTERNAL REPORTING 3

5 NO DETRIMENT POLICY..... 4

6 ASSOCIATED DOCUMENTS 5

APPENDIX A 5

1 INTRODUCTION

- 1.1 One of the most fundamental principles governing any organisation, whether in the private or public sector, is the proper use of funds - however these are derived. This document sets out the procedures that apply regarding reporting of any detected or suspected fraud or other illegal act determined within or outside of Commisceo Primary Care Solutions.

2 PRINCIPLES

- 2.1 There are three fundamental principles that govern everyone working in Commisceo Primary Care Solutions:

- Accountability – everything done by those who work in Commisceo Primary Care Solutions must be able to stand the test of public and parliamentary scrutiny and judgements on propriety and professional codes of conduct.
- Probity – absolute honesty and integrity should be exercised in dealing with suppliers, patients, staff and contracts.
- Openness – Commisceo Primary Care Solutions activities will be sufficiently transparent at all times so as to promote confidence between the practice and its providers, staff and patients. All financial records will be available and accessible by more than one person at all times.

- 2.2 It is therefore important that all those who work within Commisceo Primary Care Solutions are aware of our commitment to the elimination of fraud and other illegal acts involving dishonesty or damage to property. For simplicity, all such offences are referred to as “fraud”, except where the context indicates otherwise.

3 THE POLICY

- 3.1 BB Healthcare Solutions is committed to the elimination of any fraud within the activities of the organisation to this end:

- Every case of suspected fraud will be rigorously investigated.
- The police will be called in whenever it appears that a criminal offence may have been committed.
- Commisceo Primary Care Solutions disciplinary procedures will be rigorously followed.
- Action will be taken to recover any loss to the organisation.
- Fraudulent activity will be considered as Gross Misconduct and may be subject to summary dismissal.

4 INTERNAL REPORTING

- 4.1 If a member of staff has reason to suspect a colleague, provider or other person of committing a fraudulent offence, or other offence involving a serious infringement of Commisceo Primary Care Solutions rules, for example:

- Theft of the organisations property
- Abuse of the organisations property

- Deception or falsification of records
 - Fraudulent claims
- 4.2 the member of staff should, in the first instance, report their concerns to the project co-ordinator. If it is suspected that the service manager may be involved in the fraud, the report should be made to the Medical Director.
 - 4.3 The person receiving the report will make a written record of the discussion and immediately inform the senior partner before taking any action.
 - 4.4 The member of staff reporting the fraud will be kept informed as to the outcome of the investigation.

5 NO DETRIMENT POLICY

- 5.1 All members of staff have a responsibility to protect the assets of the practice.
- 5.2 Commisceo Primary Care Solutions wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore, the practice will rigorously enforce the principle that no employee will suffer in any way as a result of reporting reasonably held suspicions providing these were genuinely held and considered.
- 5.3 Any member of staff who raises suspicions that they are unable to justify as being “reasonably held” or with malicious intent will be dealt with through Commisceo Primary Care Solutions disciplinary procedures.
- 5.4 Reference should also be made to Whistleblowing Policy [*] as the principles and procedures will apply.

6 ASSOCIATED DOCUMENTATION

6.1 APPENDIX A

Equality Impact Assessment

To be completed and attached to any policy/procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	Race	No	
	Ethnic origins (including gypsies and travellers)	No	
	Nationality	No	
	Gender	No	
	Culture	No	
	Religion or belief	No	
	Sexual orientation including lesbian, gay and bisexual people	No	
	Age	No	
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4.	Is the impact of the policy/guidance likely to be negative?	N/A	
5.	If so can the impact be avoided?	N/A	
6.	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	