

NHS Cheshire and Merseyside ICB

Anti-Fraud, Bribery and Corruption Policy & Response Plan

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1 Introduction

1.1 General

One of the basic principles of public sector organisations is the proper use of public funds. The majority of people who work in the NHS conduct themselves in an honest and professional manner and they believe that fraud, bribery and corruption, committed by a minority, is wholly unacceptable as it ultimately leads to a reduction in the resources available for patient care.

Cheshire and Merseyside Integrated Care Board (the ICB) is committed to reducing the level of fraud, bribery and corruption within the NHS to an absolute minimum and keeping it at that level, freeing up public resources for better patient care. The ICB does not tolerate fraud, bribery or corruption and aims to eliminate all such activity as far as possible.

The ICB, at its most senior levels, wishes to encourage anyone having reasonable suspicions of fraud, bribery or corruption to report them. For the purposes of this policy “reasonably held suspicions” shall mean any suspicions other than those which are totally groundless (and/or raised maliciously).

It is the ICB’s policy that no employee will suffer in any way as a result of reporting these suspicions. This protection is given under the provisions of the Public Interest Disclosure Act 1998, and other related legislation / regulations, which the ICB is obliged to comply with.

The ICB will take all necessary steps to counter fraud, bribery and corruption in accordance with this policy, with the Government Functional Standard GovS 013: Counter Fraud (NHS Requirements), NHS contractual requirements and with regard to the policies, directions, instructions and guidance as issued by the NHS Counter Fraud Authority (NHSCFA), as well as in accordance with relevant UK legislation.

The ICB will seek the appropriate disciplinary, regulatory, civil and criminal sanctions [as well as referral to professional bodies, where appropriate] against fraudsters and, where possible, will attempt to recover losses.

Each ICB is required to appoint its own dedicated Anti-Fraud Specialist (AFS), also known as Local Counter Fraud Specialist (LCFS), who is accredited by the NHSCFA and accountable to them professionally for the completion of a range of preventative anti-fraud, bribery and corruption work, as well as for undertaking any necessary investigations. Locally, the AFS is accountable on a day-to-day basis to the ICB Director of Finance and also reports, periodically, to the ICB Audit Committee.

All instances where fraud, bribery and/or corruption is suspected are thoroughly investigated by suitable accredited personnel. Any investigations will be undertaken in accordance with the NHSCFA investigatory toolkit requirements.

[NB. For staff awareness, **theft issues** are usually dealt with by Local Security Management Specialists (LSMS), not the AFS. However, the AFS will be mindful of any potential criminality identified in the course of any investigation and will, with the agreement of the Director of Finance, notify the appropriate investigating authority].

1.2 Aims and Objectives

The ICB is committed to taking all necessary steps to counter fraud, bribery and corruption.

The aim of this policy is to provide a guide for employees as to what fraud is in the NHS, to emphasise that it is everyone’s responsibility to prevent fraud, bribery and corruption and to provide guidance on how to report it.

The NHSCFA unified approach to tackling fraud and economic crime against the NHS ('NHSCFA Strategy 2023-26') is guided by four strategic pillars of activity:

- Understand: Understand how fraud, bribery and corruption affects the NHS
- Prevent: Ensure the NHS is equipped to take proactive action to prevent future losses from occurring
- Respond: Ensure the NHS is equipped to respond when a fraud occurs
- Assure: Provide assurance to key partners, stakeholders and the public that the overall response to fraud across the NHS is robust.

1.3 Scope

This policy has been produced by the ICB's AFS, and is intended to provide a guide for all employees [regardless of position or employment status], contractors, consultants, vendors and other internal and external stakeholders who have a professional or business relationship with the ICB, on what fraud and corruption are in the NHS; what everyone's responsibilities are to prevent fraud, bribery and corruption; and also how to report concerns and/or suspicions with the intention of reducing fraud to a minimum within the ICB.

This policy relates to all forms of fraud, bribery and corruption and is intended to provide direction and help to employees who may identify suspected fraud, bribery or corruption. It provides a framework for responding to suspicions of fraud, bribery and corruption, advice and information on various aspects of fraud, bribery and corruption and implications of an investigation. It is not intended to provide a comprehensive approach to preventing and detecting fraud, bribery and corruption.

2 Definitions

2.1 NHS Counter Fraud Authority (NHSCFA) / NHS Counter Fraud Strategy¹

The NHS Counter Fraud Authority (NHSCFA) is a health authority with the responsibility for the identification, investigation and prevention of fraud and other economic crime within the NHS and the wider health group. Its purpose is to "protect the NHS from fraud, bribery and corruption" by being experts and leaders in its field, leading the NHS response, empowering others and putting the interests of the NHS and its patients first. The NHSCFA also maintains a national NHS Counter Fraud Strategy which sets out the strategic approach and direction, key challenges and opportunities, and the priority areas identified for tackling fraud, bribery and corruption in the NHS. The ICB's local approach to tackling fraud, bribery and corruption, through the work of the AFS, organisational resources and the annual risk-assessed counter fraud work plan, fully acknowledges and aligns itself to the priorities set out in the national strategy.

2.2 Government Functional Standard GovS 013: Counter Fraud² (NHS Requirements)

A requirement in the NHS standard contract is that providers and commissioners of NHS services must take the necessary action to comply with the NHSCFA's counter fraud standards. Others should have due regard to the standards. The contract places a requirement on providers and commissioners to have policies, procedures and processes in place to combat fraud, bribery and corruption to ensure compliance with the standards. The NHSCFA carries out regular assessments of health organisations in line with the counter fraud standards.

2.3 ICB Counter Fraud Statutory Guidance³

As per the guidance, the ICB will liaise with NHSE and providers as necessary in respect of any fraud allegations arising around primary care provision. Due consideration will be given to the nature of the allegations raised and where the contractual responsibility resides for any primary care funds identified as being at risk of abuse. On occasions, this may necessitate a multi-agency approach to an investigation and the ICB's AFS will advise the ICB accordingly. Similarly, the AFS will advise on any other counter fraud

arrangements relating to primary care provision that may be necessary or appropriate. The AFS will ensure ICB compliance with the relevant requirements of the guidance.

2.4 Fraud⁴

The Fraud Act 2006 introduced an entirely new way of investigating and prosecuting fraud, which can relate to money, property or other benefits of value. Previously, the word 'fraud' was an umbrella term used to cover a variety of criminal offences falling under various legislative acts. It is no longer necessary to prove that a person has been deceived, or for a fraud to be successful. The focus is now on the dishonest behaviour of the suspect and their intent to make a gain either for themselves or another; to cause a loss to another; or expose another to a risk of a loss.

There are several specific offences under the Fraud Act 2006; however, there are three primary ways in which it can be committed that are likely to be investigated by the AFS.

The offence of fraud can be committed in three ways:

- **Fraud by false representation (s.2)** – lying about something using any means, e.g. falsifying a CV or NHS job application form.
- **Fraud by failing to disclose (s.3)** – not saying something when you have a legal duty to do so, e.g. failing to declare a conviction, disqualification or commercial interest when such information may have an impact on your NHS role, duties or obligation and where you are required to declare such information as part of a legal commitment to do so.
- **Fraud by abuse of a position of trust (s.4)** – abusing a position where there is an expectation to safeguard the financial interests of another person or organisation, e.g. a carer abusing their access to patients' monies, or an employee using commercially confidential NHS information to make a personal gain.

It should be noted that all offences under the Fraud Act 2006 occur where the act or omission is committed dishonestly and with intent to cause gain or loss. The gain or loss does not have to succeed, so long as the intent is there. Successful prosecutions under the Fraud Act 2006 may result in an unlimited fine and/or a potential custodial sentence of up to 10 years.

The Economic Crime and Corporate Transparency Act 2023 (ECCTA 2023) includes a corporate fraud offence of 'failure to prevent fraud' [5] which came into force on 1st September 2025.

This fraud is where someone connected with the organisation (what the Act calls an 'associated person') commits a fraud offence that intentionally benefits the organisation, or a related body, rather than just the individual, and where the organisation should have had procedures in place to prevent it happening.

If this offence occurs, the health body can be prosecuted.

The offence applies to large organisations (which includes NHS organisations), and all those 'associated persons' conducting work on their behalf. 'Associated persons' includes employees of all levels and volunteers, but can also include contractors, subsidiaries, agents and other service providers or partner organisations.

Successful prosecutions under the 'failure to prevent fraud' section of the ECCTA 2023 may result in an unlimited fine to the organisation. In addition to this there may be associated reputational damage to the organisation as well as operational disruption and other sanctions against those who committed the fraud or allowed it to happen through their actions or inactions.

The 'benefit' to the organisation has not been defined, but is not limited to a purely financial benefit, and the benefit does not have to materialise; the intention is sufficient.

An example of this kind of fraud may be where a manager liaises with an established recruitment agency to ensure that additional staff are available to meet demands; standard recruitment controls are intentionally ignored to ensure sufficient resources can be provided.

All organisations can prevent prosecution if they have 'reasonable procedures' in place, which are intended to make people aware of their responsibilities and mitigate the risk of someone committing the offence on behalf of the organisation. These procedures are supported by the work of the Anti-Fraud Specialist, who can provide further information.

2.5 Bribery and Corruption⁵

The ICB adopts a 'zero tolerance' attitude towards bribery and does not, and will not, pay or accept bribes or offers of inducement to or from anyone, for any purpose. The ICB is fully committed to the objective of preventing bribery and will ensure that adequate procedures, which are proportionate to our risks, are in place to prevent bribery.

The Bribery Act 2010⁶ reformed the criminal law of bribery, making it a criminal offence to:

- Give, promise, or offer a bribe (s.1), and/or
- Request, agree to receive or accept a bribe (s.2).

Corruption is generally considered to be an "umbrella" term covering such various activities as bribery, corrupt preferential treatment, kickbacks, cronyism, theft or embezzlement. Under the 2010 Act, however, bribery is now a series of specific offences.

Generally, bribery is defined as: ***an inducement or reward offered, promised or provided to someone to perform their functions or activities improperly in order to gain a personal, commercial, regulatory and/or contractual advantage.***

Examples of bribery in an NHS context could be a contractor attempting to influence a procurement decision-maker by giving them an extra benefit or gift as part of a tender exercise; or, a medical or pharmaceutical company providing holidays or other excessive hospitality to a clinician in order to influence them to persuade their ICB to purchase that company's particular clinical supplies.

A bribe does not have to be in cash; it may be the awarding of a contract, the provision of gifts, hospitality, sponsorship, the promise of work or some other benefit. The persons making and receiving the bribe may be acting on behalf of others – under the Bribery Act 2010, all parties involved may be prosecuted for a bribery offence.

All staff are reminded to ensure that they are transparent in respect of recording any gifts, hospitality or sponsorship and they should refer to the separate ICB's policy, the 'Conflict of Interest Policy and Procedure' covering:

- Acceptance of Gifts and Hospitality
- Declaration of Interests
- Sponsorship.

The Bribery Act 2010 applies to (and can be triggered by) everyone "associated" with the ICB who performs services for it, or on its behalf, or who provides it with goods. This includes those who work for and with it, such as employees, agents, subsidiaries, contractors and suppliers (regardless of whether they are incorporated or not). The term 'associated persons' has an intentionally wide interpretation under the Bribery Act 2010. Sanctions, following a successful prosecution, are similar to those of the Fraud Act 2006.

3 Roles and Responsibilities

Through their day-to-day work, all staff, are in the best position to recognise any specific risks within their own areas of responsibility. They also have a duty to ensure that those risks – however large or small – are identified and eliminated. Where staff believe the opportunity for fraud, bribery or corruption exists, whether because of poor procedures or oversight, they should report it to the AFS or the NHS Fraud and Corruption Reporting Line and/or online Fraud Reporting Form.

This section states the roles and responsibilities of employees and other relevant parties in reporting fraud, bribery or corruption.

3.1 Chief Executive

The ICB's Chief Executive, as the organisation's accountable officer, has overall responsibility for securing funds, assets and resources entrusted to it, including instances of fraud, bribery and corruption

The Chief Executive must ensure adequate policies and procedures are in place to protect the organisation and the public funds it receives. However, responsibility for the operation and maintenance of controls falls directly to line managers and requires the involvement of all of ICB employees. The ICB therefore has a duty to ensure employees who are involved in or who are managing internal control systems receive adequate training and support in order to carry out their responsibilities. Therefore, the Chief Executive and ICB's Executive Director of Finance will monitor and ensure compliance with this policy.

3.2 Board

The ICB's Board has a duty to provide adequate governance and oversight of the ICB to ensure that its funds, people and assets are adequately protected against criminal activity, including fraud, bribery and corruption.

The Board provides clear and demonstrable support and strategic direction for counter fraud, bribery and corruption work. They review the proactive management, control and the evaluation of counter fraud, bribery and corruption work. The Board and non-executive directors scrutinise NHSCFA assessment reports, where applicable, and ensure that the recommendations are fully actioned.

3.3 Executive Director of Finance and Contracting

The Executive Director of Finance (DOF) has the power to approve financial transactions initiated by directorates across the organisation.

They prepare, document and maintain detailed financial procedures and systems and apply the principles of separation of duties and internal checks to supplement those procedures and systems.

The DOF will report annually to the Board on the adequacy of internal financial controls and risk management as part of the Board's overall responsibility to prepare a statement of internal control for inclusion in the annual report.

They also act as the Executive Lead for the organisation's counter fraud arrangements, liaising closely with the AFS.

The DOF will, depending on the outcome of initial investigations, inform appropriate senior management of suspected cases of fraud, bribery and corruption, especially in cases where the loss may be above an agreed limit or where the incident may lead to adverse publicity.

3.4 Audit Committee

The role of the Audit Committee includes reviewing, approving and monitoring counter fraud work plans, receiving regular updates on counter fraud activity, monitoring the implementation of action plans, providing direct access and liaison with those responsible for counter fraud, reviewing annual reports on counter fraud, and discussing NHSCFA quality assessment reports. Reference: NHS Audit Committee Handbook 2018 <https://www.hfma.org.uk/publications?Type=Guide>.

3.5 Internal and External Audit

The role of internal and external audit includes reviewing controls and systems and ensuring compliance with financial instructions. They have a duty to pass on any suspicions of fraud, bribery or corruption to the AFS.

3.6 Human Resources

Human Resources (HR) play a crucial role in relation to employees in suspected cases of fraud, bribery and corruption, including liaison with the AFS and the conduct of any investigation, and instigating the necessary disciplinary action against those who fail to comply with the policies, procedures and processes. HR work with the AFS to ensure that appropriate parallel sanctions are applied (in accordance with the NHSCFA Anti-Fraud Manual) where fraud, bribery or corruption is proven against employees. Appropriate joint working protocols exist to detail this relationship.

3.7 Anti-Fraud Specialist

The AFS is responsible for taking forward all anti-fraud work locally in accordance with the Government Functional Standard GovS 013: Counter Fraud (NHS requirements), as well as the NHS Counter Fraud Strategy and ICB Counter Fraud Statutory Guidance, and reports directly to the DOF.

Adhering to the Government Functional Standard GovS 013: Counter Fraud (NHS requirements) is important in ensuring that the organisation has appropriate counter fraud, bribery and corruption arrangements in place and that the AFS will look to achieve the highest standards possible in their work.

The AFS will work with key colleagues and stakeholders to promote counter fraud work, apply effective preventative measures and investigate allegations of fraud, bribery and corruption.

The AFS will conduct risk assessments in relation to their work to prevent fraud, bribery and corruption.

The AFS has responsibility for investigating any allegations of fraud, bribery and corruption within and on behalf of the organisation.

3.8 Counter Fraud Champion

Where a Counter Fraud Champion has been appointed, their role and duties include:

- Promoting awareness of fraud, bribery and corruption within the organisation,
- Understanding the threat posed by fraud, bribery and corruption and,
- Understanding best practice on counter fraud.
- They do not have any remit to investigate allegations of fraud, bribery or corruption.

3.9 Freedom to Speak-Up Guardians ('Whistleblowing')

The ICBs Freedom to Speak-Up / Whistleblowing Guardian has a responsibility to report allegations they receive relating to fraud, bribery or corruption against the organisation to the AFS (whilst protecting the identity of the referrer, if necessary).

3.10 Managers

All managers are responsible for ensuring that policies, procedures and processes within their local area are adhered to and kept under constant review.

Managers have a responsibility to ensure that staff are aware of fraud, bribery and corruption and understand the importance of protecting the organisation from it.

Managers will also be responsible for the enforcement of disciplinary action for staff who do not comply with policies, procedures and processes.

Managers should report any instances of actual or suspected fraud, bribery or corruption brought to their attention to the AFS immediately. It is important that managers do not investigate any suspected financial crimes themselves.

Other responsibilities managers have include conducting risk assessments and mitigating identified risks.

3.11 All Employees

Employees are required to comply with the organisation's policies, procedures and processes and apply best practice in order to prevent fraud, bribery and corruption (for example in the areas of procurement, personal expenses and ethical business behaviour). Staff should be aware of their own responsibilities in accordance with the organisation's standards of behaviour and in protecting the organisation from these crimes.

Employees who are involved in or manage internal control systems should be adequately trained and supported in order to carry out their responsibilities. If an employee suspects that fraud, bribery or corruption has taken place, they should ensure it is reported to the AFS and/or to NHSCFA as explained below.

3.12 Information Management and Technology

The ICB's Head of Information Security (or equivalent position) will contact the AFS immediately in all cases where there is suspicion that ICB ICT (Information and Communications Technology) is being used for fraudulent purposes in accordance with the Computer Misuse Act 1990. Similarly, the Head of Information Security (or equivalent position) will liaise closely with the AFS to ensure that a subject's access (both physical and electronic) to ICB ICT resources is suspended or removed where an investigation identifies that it is appropriate to do so.

4 The Response Plan

4.1 Bribery and Corruption

The AFS undertakes an annual fraud and bribery risk assessment, in conjunction with the organisation conducting periodic assessments (in line with Ministry of Justice guidance⁷) to assess how bribery and corruption may affect it. Proportionate procedures and measures have been put in place to mitigate identified risks.

The organisation also has a policy and procedure in place in relation to the completion of declarations of interest, declarations of secondary employment and the hospitality/gifts register. The relevant policy and procedures are accessible via the ICB's Staff Hub and via the ICB's website at: <https://www.cheshireandmerseyside.nhs.uk/about/how-we-work/managing-conflicts-of-interest> and staff are required to comply with these arrangements. Instances of non-compliance may be referred to the AFS for further investigation.

The AFS has primary organisational responsibility for investigating allegations of fraud,

bribery and corruption against or with the organisation.

4.2. Reporting Fraud, Bribery or Corruption

This section outlines the action to be taken if fraud, corruption or bribery is discovered or suspected.

All genuine suspicions of fraud, bribery and corruption must be reported directly to the AFS via investigation.team@miaa.nhs.uk.

If the referrer believes that the DOF or AFS is implicated, they should notify whichever party is not believed to be involved who will then inform the Chief Executive and Audit Committee Chairperson.

An employee can contact any executive or non-executive director of the ICB to discuss their concerns if they feel unable, for any reason, to report the matter to the AFS or DOF. Details of a suspected fraud, bribery and corruption may also be reported through the **NHS Fraud and Corruption Reporting Line** on **Freephone 0800 028 4060**, (powered by 'Crimestoppers 24/7') or online at <https://cfa.nhs.uk/reportfraud>, in addition to the AFS.

The AFS and/or the NHSCFA will undertake an investigation and seek to apply criminal and civil sanctions, where appropriate. Any investigation would follow its set investigative procedures.

Investigations may also include police involvement, where appropriate.

All NHS bodies including private providers, commissioners and Trusts refer to the Home Office's bribery and corruption assessment template⁸ in order to assess their response to bribery and corruption.

4.3 Whistleblowing / Freedom to Speak Up

Concerns regarding fraud, bribery or corruption may also be reported to the ICB via the Freedom to Speak Up Guardian ("Whistleblowing"), in accordance with the related ICB policy which will be available via the ICBs Staff Hub and ICB Staff website at www.cheshireandmerseyside.nhs.net.

4.4 Disciplinary Action

Disciplinary procedures, in the context of fraud allegations, will be initiated where an employee is suspected of being directly involved in a fraudulent or illegal act, or where their negligent action has led to a fraud being perpetrated. The organisation's disciplinary policy can be located via the ICB's Staff Hub.

4.5 Sanctions and Redress

This section outlines the sanctions that can be applied and the redress that can be sought against individuals who commit fraud, bribery and corruption against the organisation.

The ICB's approach to pursuing sanctions in cases of fraud, bribery and corruption is that the full range of possible sanctions – including criminal, civil, disciplinary and regulatory – should be considered at the earliest opportunity and any or all of these may be pursued where and when appropriate. The consistent use of an appropriate combination of investigative processes in each case demonstrates the ICB's commitment to take fraud, bribery and corruption seriously and ultimately contributes to the deterrence and prevention of such actions.

Briefly, the types of sanction which the organisation may apply when a financial offence has occurred include:

- **Civil** – civil sanctions can be taken against those who commit fraud, bribery and

corruption to recover money and/or assets which have been fraudulently obtained, including interest and costs.

- **Criminal** – The AFS will work in partnership with the NHSCFA, the police and/or the Crown Prosecution Service to bring a case to court against an alleged offender. Outcomes can range from a criminal conviction to fines and imprisonment.
- **Disciplinary** – Disciplinary procedures will be initiated where an employee is suspected of being involved in a fraudulent or illegal act, as per Section 4.3 of this policy.
- **Professional Body Disciplinary** – If warranted, staff may be reported to their professional body as a result of a successful investigation/prosecution.
- The ICB will seek financial redress whenever possible to recover losses to fraud, bribery and corruption. Redress can take the form of confiscation and compensation orders, a civil order for repayment, or a local agreement between the organisation and the offender to repay monies lost. It may also include recovery via an employee's NHS pension.

5 Review

5.1 Monitoring and auditing of policy effectiveness

Monitoring is essential to ensuring that controls are appropriate and robust enough to prevent or reduce fraud. Monitoring arrangements include reviewing system controls on an ongoing basis and identifying weaknesses in processes.

Where deficiencies are identified as a result of monitoring, appropriate recommendations and action plans are developed and implemented.

5.2 Dissemination of the policy

This policy will be brought to the attention of all employees and will form part of the induction process for new staff.

This policy will be disseminated ICB wide for all employees to understand and be made aware of via awareness presentations, through the ICB's established communication routes and on the ICB's Staff Hub.

It is important that staff understand and are aware of this policy.

5.3 Review of the policy

The AFS will on a regular basis review this policy. Given the ongoing nature of anti-fraud work and the ongoing development of the ICB, this policy will be reviewed yearly to ensure it remains fit for purpose. The ICB's Audit Committee will review any proposed changes to the policy and it will be approved via the approval route as outlined within the ICB's Scheme of Delegation and Reservation.

References

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