

APPENDIX 1 – Thematic Assessment Final Progress Report

Question	Response	Action Required	Action completed
Standard 3.4 Pre-Employment Checks			Yes / No (comments included)
Can the organisation confirm that all directly employed staff are recruited using the shared services (SS) policies and protocols including pre-employment checks?	Not all directly employed staff are processed by NWSSP, but all recruiting managers should be adhering to the NHS Employers recruitment guidance, which is the guidance that NWSSP's processes are based on	There should be a proactive exercise undertaken between the LCFS and HR implementing recommendations made in NHSCFA and NHS Employers guidance and with policies and protocols set out by NWSSP. The findings of the proactive exercise should inform the health bodies fraud risk assessments and an action plan should be developed to mitigate identified risks. Risk assessments should be undertaken, recorded and managed in line with health bodies risk management policies. Progress against action plans should be reported upon to audit committee.	Actions for this issue have been undertaken and presented to the health bodies audit committee.

<p>Does the organisation employ agency staff?</p>	<p>We don't employ agency staff, we contract with various agencies to provide staff.</p>	<p>There should be a proactive exercise undertaken between the LCFS and HR implementing recommendations made in NHSCFA and NHS Employers guidance and with policies and protocols set out by NWSSP. The findings of the proactive exercise should inform the health bodies fraud risk assessments and an action plan should be developed to mitigate identified risks. Risk assessments should be undertaken, recorded and managed in line with health bodies risk management policies. Progress against action plans should be reported upon to audit committee.</p>	<p>Actions for this issue have been undertaken and presented to the health bodies audit committee.</p>
<p>When employing agency staff does the organisation use the SS policies and protocols including pre-employment checks?</p>	<p>We don't employ agency staff, we contract with various agencies to provide staff</p>	<p>There should be a proactive exercise undertaken between the LCFS and HR implementing recommendations made in NHSCFA</p>	<p>Actions for this issue have been undertaken and presented to the health</p>

		<p>and NHS Employers guidance and with policies and protocols set out by NWSSP. The findings of the proactive exercise should inform the health bodies fraud risk assessments and an action plan should be developed to mitigate identified risks. Risk assessments should be undertaken, recorded and managed in line with health bodies risk management policies. Progress against action plans should be reported upon to audit committee.</p>	<p>bodies audit committee.</p>
<p>If agency staff are not employed using the SS policies and protocols, what pre-employment checks are undertaken?</p>	<p>There would be an expectation that the providing agency will have undertaken pre-employment checks. Certainly, with agency nurses, the agency is responsible for the PECs, but we contract with the agency to provide the staff rather than directly employing the staff.</p>	<p>There should be a proactive exercise undertaken between the LCFS and HR implementing recommendations made in NHSCFA and NHS Employers guidance and with policies and protocols set out by NWSSP. The findings of the proactive</p>	<p>Actions for this issue have been undertaken and presented to the health bodies audit committee.</p>

		<p>exercise should inform the health bodies fraud risk assessments and an action plan should be developed to mitigate identified risks.</p> <p>Risk assessments should be undertaken, recorded and managed in line with health bodies risk management policies.</p> <p>Progress against action plans should be reported upon to audit committee.</p>	
When were HR staff last given fraud awareness training and what did this include?	<p>New starters to Recruitment also receive counter fraud training during induction.</p> <p>NWSSP Recruitment staff are booked to receive refresher Counter Fraud training on 17/12/19.</p>		
Have HR staff received document recognition training and if so, when?	<p>Recruitment staff received ID Fraud Training from Terry Stevens (Terry.Stevens@south-wales.pnn.police.uk), Counter Terrorism Security Officer, South Wales Police on 14/10/19.</p>		
Standard 3.5 Procurement Fraud			

<p>Can the organisation confirm whether all procurement is undertaken utilising the shared services protocols and procedures?</p>	<p>All Procurement activity undertaken by the Procurement department is conducted in line with NWSSP Procurement services protocols and procedures. Some areas of procurement activity undertaken by the Health Board are devolved and so are not conducted in line with NWSSP Procurement services protocols and procedures. Advice is however available from the Procurement department regarding all organisation procurement activity.</p>		
<p>If you answered no which areas of procurement within your organisation are not undertaken utilising shared services protocols and procedures?</p>	<p>At present, HSDU, MEMS and Pathology are able to raise orders in Oracle, any individual orders raised that exceed the quotation threshold (£5k) have to be approved by the Frontline Procurement Department. Where purchases exceed the threshold, checks are conducted by the Procurement department to ensure that the organisations Standing Orders and Standing Financial Instructions are adhered to.</p> <p>Catering and Estates orders have moved away from local purchasing to the Procurement department within the last 18 months.</p>		

<p>Does all procurement comply with the organisations standing financial instructions?</p>	<p>Yes, all procurement activity is conducted in line with the organisations Standing Orders and Standing Financial Instructions where the Procurement department have visibility of the activity.</p> <p>The following advice is both available to all parts of the Health Board and is followed by the Procurement department in conducting activity; Purchases in excess of £5,000 - if not covered by an existing contract are subject to the Health Boards Quotation procedure. If in doubt please contact a member of the procurement department before putting a requisition on the system.</p> <p>Single Quotation Action (SQA) - is only to be used in exceptional circumstances when the equipment or service required exceeds the HB's Quotation threshold, but cannot be put out to quote as it is either unique in its functionality, (there is nothing in the market that does the same or similar), or we can only purchase specific goods or services due to compatibility issues with existing equipment/services. If in</p>		
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	<p>doubt please contact a member of the procurement department before putting a requisition on the system Purchases in excess of £25,000 - if not covered by an existing contract are subject to the Health Boards Tender procedure. If in doubt please contact a member of the procurement department before putting a requisition on the system.</p> <p>Single Tender Action (STA) - is only to be used in exceptional circumstances when the equipment or service required exceeds the HB's Tender threshold, but cannot be put out to quote as it is either unique in its functionality, (there is nothing in the market that does the same or similar), or we can only purchase specific goods or services due to compatibility issues with existing equipment/services. If in doubt please contact a member of the procurement department before putting a requisition on the system.</p>		
<p>When were staff engaged in procurement last given fraud awareness training</p>	<p>This is part of all Procurement departments staff's mandatory training and we are 100% compliant. I am unable to confirm</p>		

<p>and what did this include</p>	<p>whether the wider staff group that are engaged in procurement (local purchasers, members of evaluation panels) have been given fraud awareness training.</p>		
<p>Do the organisation ensure that those staff engaged in procurement complete declarations of interest documentation and are these recorded?</p>	<p>Yes, this is a standard requirement that is embedded within NWSSP Procurement services Integrated Management System Policies, Procedures and templates. All returns are recorded in accordance with the requirements of the procedure. Annual DOI forms are completed by all NWSSP Procurement staff at band 6 level and above.</p>		
<p>Has the organisation carried out a risk assessment to consider the risks identified in the NHSCFA document "Pre-contract procurement fraud and corruption: Guidance for prevention and detection"?</p>	<p>All risks that are identified are covered within the NWSSP Procurement services Integrated Management System Policies, Procedures and templates. The Guidance documents are also available via NWSSP Procurement Services intranet page.</p>		
<p>Is all procurement activity at the organisation subject to audit?</p>	<p>Yes, NWSSP Procurement services activity is subject to both internal and external audits. These include the Wales Audit Office, ISO 3rd party auditors, NWSSP Internal Audit,</p>		

	NWSSP Procurement Audit, Swansea Bay UHB internal Audit and Swansea Bay UHB appointed external auditors.		
Standard 3.6 Invoice Fraud			
Has the organisation ensured that it has adequate and proportionate processes in place for the prevention, detection and deterrence of invoice fraud, bribery and corruption?	Yes, NWSSP commissioned forensic software in 2016 that detects duplicate payments and in addition since becoming a Shared Service, it has centralised its supplier set-up and validation activities, so that supplier edit rights are restricted to a few individuals. In addition, the AP Division is proactively working with the All Wales P2P Forum to reduce the number on no PO invoices that are transacted each year		
Has the organisation undertaken a comprehensive and systematic risk assessment to consider the risk identified in the NHSCFA document "Invoice fraud: Guidance for prevention and detection" within the last two years?	Yes, this is part of our day to day responsibilities and we work closely with local Counter Fraud staff in undertaking this responsibility		
Has the organisation undertaken any	Yes, we have commissioned forensic software and in addition		

<p>preventative and detection work as described in sections 3 to 6 of the same document?</p>	<p>we have commissioned a third party supplier to undertake recovery audit work on behalf of NHS Wales</p>		
<p>When were staff engaged in invoicing processes last given fraud awareness training and what was the content?</p>	<p>Training is currently being delivered to AP staff in North & South Wales. This should be completed by mid-January 2020</p>		
<p>Have any findings from either proactive or reactive work relating to invoice fraud, bribery and corruption led to improvements in the processes in place at the organisation?</p>	<p>The AP Division works closely with Internal Audit, Counter Fraud and the Wales Audit office in improving and enhancing our procedures and processes. During 2018/19 the AP Division achieved ISO 9001, ensuring a consistency of approach in tackling this</p>		