

REFERENCE NUMBER OF DOCUMENT:	11.2.383.01
COMMITTEE IDENTIFICATION:	Galago Directors
SECRETARIAT:	MS
DOCUMENT TYPE:	External Policy
DOCUMENT LANGUAGE:	E
THIS POLICY IS FOR:	Staff including Agency Workers (temporary workers), Commissioners and Service Users

COUNTER FRAUD

WARNING:

If the document contains proprietary information, it may only be released to third parties after management has approved its release.

Unless otherwise marked, documents are uncontrolled; uncontrolled documents are not subject to update notifications.

The latest revision of this document can be found in the reference panel above. It can also be determined and double checked by checking the 'Master Document List' before using or sending.

Any changes must be requested through the 'Document Control Manager' by submitting a 'Document Change Request' form.

COUNTER FRAUD POLICY AND PROCEDURE

1. PURPOSE

1.1 Nursing Direct has a zero-tolerance approach towards deception, fraud, corruption, and bribery and is committed to taking action against perpetrators of such acts.

This policy outlines the clear framework for the prevention of fraud, corruption, and bribery.

1.2 This policy dovetails with the following policies:

- Anti-Bribery Policy and Procedure
- Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure

1.3 To support Nursing Direct in meeting the Key Lines of Enquiry (KLOE) and relevant Quality Statements as set out by Care Quality Commission (CQC).

1.4 Relevant Legislation

- Economic Crime and Corporate Transparency Act 2023
- The Bribery Act 2010
- Public Contracts Regulations 2015
- Fraud Act 2006

2. SCOPE

2.1 Roles Affected:

- All Staff including Agency Worker

2.2 People Affected:

- Service Users

2.3 Stakeholders Affected:

- Commissioners
- Local Authority
- NHS/ICB

3. OBJECTIVES

3.1 Nursing Direct will ensure that all staff including Agency Workers receive appropriate information and training relating to what counter fraud is and what to do if they suspect that fraudulent or corrupt activity has taken, or is taking, place.

4. POLICY

4.1 Counter Fraud

Counter fraud refers to the steps and measures taken to combat fraud against the public and private sector which takes money away from services on which the public depend, including the NHS and Adult Social Care.

Fraud

The use of deception for personal gain, most often for monetary gain. It can also involve bribery, corruption, and the abuse of a position of trust. It is defined by the Fraud Act 2006 as:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

Corruption

Dishonest or fraudulent conduct by those in power for their own personal gain.

Bribery

The Bribery Act 2010 defines bribery as giving or receiving a financial or other advantage in connection with the 'improper performance' of a position of trust or function that is expected to be performed impartially or in good faith.

4.2 Nursing Direct conducts all business in an honest and ethical manner.

Nursing Direct works in a truthful and honourable way with all commissioners, be that public or private, and is aware of the detrimental impacts of failing to conduct its business appropriately.

Fraud, corruption, or bribery will not be tolerated.

4.3 Nursing Direct operates without collusion, bribery, mis-selling and false validation.

Nursing Direct generates invoices for works supplied under the agreed price, as well as the agreed contract terms and conditions and on no account shall create false claims or invoices.

4.4 All staff including Agency Workers at Nursing Direct receive training appropriate to their role regarding counter fraud and the conduct expected in this area of their work.

All staff including Agency Workers will:

- Work honestly and with integrity
- Not accept any bribe or gift (item of personal gain) in exchange for information or goods
- Not offer a payment, gift, or hospitality to any representative or government official to 'facilitate' or expedite a routine procedure
- Under no circumstances create false invoices for the financial benefit of themselves or another third party
- Only claim for actual travel expenses and understand that false claims for travel and mileage are indeed fraudulent and an act of stealing
- Report suspected or confirmed fraudulent or corrupt activity
- Not engage in any activity that might lead to a breach of this policy

5. PROCEDURE

5.1 The Economic Crime and Corporate Transparency Act 2023 outlines the key guidance for organisations to ensure that they take steps to prevent fraud within their company. Nursing Direct recognises its duty to ensure such measures are taken.

5.2 The Commitment of Nursing Direct to Counter Fraud

In agreeing with this policy, Nursing Direct understands that:

- Fraud, corruption and bribery will not be tolerated
- Working in an honest way is an integral part of the ethos at Nursing Direct
- It is committed to preventing fraud, corruption, and bribery
- All staff including Agency Workers are educated about fraud, corruption and bribery and act with honesty and integrity at all times
- Those committing acts of fraud, corruption and bribery will be dealt with quickly and will face prosecution

5.3 The NHS Counter Fraud Authority

The NHS Counter Fraud Authority released guidance in its 'Suppliers' Code of Practice: preventing fraud, bribery and corruption, January 2024' which states that suppliers to the NHS should always ask themselves:

- Is it legal?
- Does it feel right and fair?
- Am I comfortable with it?
- Is it something that may be portrayed negatively in the media?
- If my actions were made public, would they be represented in a positive way?

5.4 Support for Staff including Agency Workers

To assist all staff including Agency Workers in identifying and recognising fraud, corruption and bribery, Nursing Direct will:

- Provide regular training and awareness sessions that assist both new and existing staff including Agency Workers in recognising signs of such activity and how to prevent it
- Ensure that all staff including Agency Workers understand the severity of fraudulent actions, and that such actions can ultimately result in prosecution
- Make sure that all staff including Agency Workers understand the measures in place to prevent fraudulent activity
- Encourage staff including Agency Workers to report suspected fraud, corruption, or bribery without fear of retribution or adverse consequences

5.5 What to do if Staff including Agency Workers Suspect Fraud, Corruption or Bribery

Nursing Direct is committed to promoting a culture where staff including Agency Workers feel able and supported to speak up about any wrongdoing in the workplace. If staff including Agency Workers are concerned about any possible or actual wrongdoing, they must report it immediately to the Registered Manager or Responsible Individual. In cases where these roles are carried out by the same person, Nursing Direct has suitable measures in place for impartiality and transparency by using an alternative external contact as outlined in the Good Governance Policy and Procedure.

All reports or concerns are treated confidentially and will be investigated fully and promptly.

Staff including Agency Workers will follow the Raising Concerns, Freedom to Speak Up and Whistleblowing policy and procedure if they suspect any wrongdoing.

NHS Suppliers

As an NHS supplier, any fraud, corruption, or bribery will be reported immediately by the Registered Manager or Responsible Individual to the relevant NHS Organisation or to the NHSCFA (NHS Counter Fraud Authority).

Any suspicions of fraud will be reported online at <https://cfa.nhs.uk/reportfraud> or through the NHS Fraud and Corruption Reporting Line 0800 028 4060.

There is also the option to report to the Local Counter Fraud Specialist.

The Police

Fraudulent activity including being the victim of a scam, fraud or cybercrime will be reported to the police at Action Fraud, either online or by telephone - 0300 123 2040.

5.6 Audits and Internal Checks

Audits and other internal checking mechanisms are in place at Nursing Direct to ensure that practices are carried out honestly and with integrity.

6. DEFINITIONS & ABBREVIATIONS

6.1 Staff including Agency Workers

6.1.1 Staff

Denotes the employees of Nursing Direct Healthcare Limited.

6.1.2 Agency Workers

Refers to individuals who are contracted with Nursdoc Limited or another employment business as an Agency Worker (temporary worker) provided to Nursing Direct Healthcare Limited to perform care services under the direction of Nursing Direct.

6.2 Nursing Direct

Nursing Direct, also known as Nursing Direct Healthcare Limited, is the entity regulated by the CQC (Care Quality Commission) and responsible for the care service provision, contracted to provide homecare services to service users in their homes, in placements, essential healthcare facilities and in the community.

6.3 Nursdoc Limited

As the sister company to Nursing Direct Healthcare Limited, Nursdoc Limited acts as an employment business, specialising in providing staffing solutions to the healthcare sector.

6.4 CQC (Care Quality Commission)

CQC throughout this policy, the term "CQC" refers to the Care Quality Commission (CQC) which is the independent regulator of health and social care in England.

6.5 NHS Counter Fraud Authority

A special health authority tasked to lead the fight against fraud, corruption, and bribery in the NHS


6.6 The Local Counter Fraud Specialist

An accredited counter fraud professional who delivers both proactive work such as raising fraud awareness and reactive work to hold those who commit fraudulent activity to account

OUTSTANDING PRACTICE

To be "outstanding" in this policy area you could provide evidence that:

- Nursing Direct Healthcare Limited ensures that all staff receive regular counter fraud training and education
- Nursing Direct Healthcare Limited ensures that there is evidence that all staff have read and understand the contents of this policy
- Nursing Direct Healthcare Limited ensures that directors and company owners act with the same honesty and integrity as they train their staff, following company policies and procedures
- All staff are fully versed in how to report suspected or actual fraudulent activity and feel safe to do so

COMPLETED DATE:	24.04.2026
SIGN OFF DATE:	29.04.2026
REVIEW DATE:	29.04.2027
SIGNED:	 Marc Stiff – Group Managing Director