NHS Rotherham Clinical Commissioning Group

AQuA – 7 July 2020

Strategic Clinical Executive – Date

GP Members Committee (GPMC) – Date

Clinical Commissioning Group Governing Body - 5 August 2020

Review of counter fraud bribery and corruption policy

Lead Executive:	Wendy Allott - Chief Finance Officer
Lead Officer:	Matt Jones - Head of Financial Services
Lead GP:	Jason Page

Purpose:

The above policy has been reviewed in line with the CCG's standard processes for policy review. The amended policy was brought to OE 07-05-20 for approval.
It is being returned today for information following the addition to Section 3.9 to cover the role of fraud champion

Background:

This policy was last updated April 2018, with a review date of April 2020.

Analysis of key issues and of risks

The policy has been reviewed by the CCG's Anti-Crime Specialist (360 Assurance) and internal finance team.

In summary

1. No material changes have been required to the content of the policy.
2. Minor changes to wording have been made in some places (and these are listed below).
3. New section added to cover role of Fraud Champion (section 3.9)
4. Where there are references or hyperlinks to content held on the CCG's intranet; that content has either been or is currently in the process of being updated.

To assist OE members , changes made under point 2 and 3 bove are shown below in red

- Section 2 ,Page 3: Words added
  "This policy is mandatory and applies to all staff whether permanent or temporary and whether employed directly or indirectly within any part of the CCG. For the avoidance of doubt this includes anybody employed via an agency, all bank staff, honorary staff, externally appointed consultants, self-employed contractors and those employed on fixed term contracts".

- Section 3.6, Page 5: Wording changed from 'direct reports'
  "CCG managers are responsible for ensuring that policies, procedures and processes within their local area are adhered to and kept under constant review. It is the responsibility of managers to ensure that staff are aware of fraud, bribery and corruption…….. "

- Section 3.9 . This is a new section added to cover the role of Fraud Champion.

Patient, Public and Stakeholder Involvement:

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n/a
Equality Impact:
Assessment attached
Financial Implications:
None
Human Resource Implications:
None
Procurement Advice:
None required
Data Protection Impact Assessment:
No issues arising from this paper
Approval history:
This is the first meeting
Recommendations:
Governing Body are asked to note the amendments and support the proposed changes to the policy. Note next scheduled review date of April 2022
Paper is for consideration and support

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