

COUNTER FRAUD POLICY

INTRODUCTION

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 with regard to reporting any detected or suspected fraud or other illegal acts.

PRINCIPLES

There are three fundamental principles that govern everyone working for GPS:

1. Accountability – everything done by those who work for GPS must be able to stand the test of public and parliamentary scrutiny, and judgements on propriety and professional codes of conduct.
2. Probity – absolute honesty and integrity should be exercised in dealing with suppliers, service users, workers, and contracts.
3. Openness – GPS activities will be always sufficiently transparent so as to promote confidence between the GPS and its providers, workers and service users. All financial records will be always available and accessible by more than one person.

Not only must these principles be followed, but they must also be seen to be followed - and all workers must be made fully aware of the details behind the use of funds.

It is therefore important that all those who work for GPS 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.

THE POLICY

GPS is committed to the elimination of any fraud. To this end:

1. Every case of suspected fraud will be rigorously investigated.
2. The police will be called in whenever it appears that a criminal offence may have been committed.
3. GPS disciplinary procedures will be rigorously followed.

4. Action will be taken to recover any loss to GPS or client providers.
5. Fraudulent activity will be considered as Gross Misconduct and may be subject to summary dismissal.
6. GPS has the right to suspend a worker pending the outcome of any investigation.

INTERNAL REPORTING

If a worker has reason to suspect a colleague, provider, or other person of committing a fraudulent offence, or other offence involving a serious infringement of GPS rules, for example:

- Theft of GPS / client provider property
- Abuse of GPS / client provider property
- Deception or falsification of records
- Fraudulent claims

The worker should, in the first instance, report their concerns to their line manager. If it is suspected that the line manager may be involved in the fraud, the report should be made to a more senior person. Alternatively, one can report concerns to the NHS Counter Fraud Authority by emailing generalenquiries@nhscfa.gov.uk

The worker reporting the fraud will be kept informed as to the outcome of the investigation.

“NO DETRIMENT” POLICY

All workers have a responsibility to protect the assets of GPS and client providers.

GPS wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore, GPS will rigorously enforce the principle that no worker will suffer in any way as a result of reporting reasonably held suspicions providing these are genuinely held and considered and have evidence supporting such a claim.

Any worker who raises suspicions that they are unable to justify as being “reasonably held” or with malicious intent will be dealt with through the disciplinary procedures.