



Business Services  
Organisation

**FRAUD POLICY &**  
**FRAUD RESPONSE PLAN**



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	<a href="#">Cyber Policies and Standards</a>		

# FRAUD POLICY

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## 1. INTRODUCTION

- 1.1. BSO is committed to the prevention of fraud and the promotion of an anti-fraud culture to ensure the proper use of the public funds with which it has been entrusted. This policy is to provide a definition of fraud and to outline the key responsibilities regarding the prevention of fraud. The procedures to be followed in the event of a fraud being detected or suspected are detailed in our **Fraud Response Plan**, as contained at **Appendix A**. This policy and the Fraud Response Plan should be read in conjunction with BSO's Raising a Concern in the Public Interest (Whistleblowing) Policy and BSO Cyber Policies and Standards. These documents are available on BSO's intranet.
- 1.2. BSO operates a **zero-tolerance approach to fraud. All staff, regardless of grade, have a duty to minimise the risk of fraud in BSO.** It requires staff at all times to act honestly and with integrity, to safeguard the public resources for which they are responsible and to report all suspicions of fraud. Staff are assured that any information which they provide will be treated confidentially subject to legal requirements.
- 1.3. Every case of attempted, suspected or proven fraud will be thoroughly investigated and where appropriate referred to the Police Service of Northern Ireland (PSNI). BSO will seek to recover funds and assets lost through fraud. After full investigation, BSO will take civil, criminal and/or disciplinary action in all cases where it is appropriate to do so. BSO is committed to ensuring that opportunities for fraud are reduced to the lowest possible level of risk.
- 1.4. This policy is concerned with internal and external fraud committed against the BSO by BSO employees, suppliers of goods and services, contractors in the course of their work or other persons.

## 2. WHAT IS FRAUD?

- 2.1. Fraud is a criminal offence. The key legislation - the Fraud Act 2006 identifies three primary fraud offences:

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

This Policy also reflects the expanded provisions under the **Economic Crime and Corporate Transparency Act 2023** including offences relating to corporate failure to prevent fraud.

**2.2. For an offence to have occurred, the person must have acted dishonestly and with the intention** of making a gain for themselves or anyone else, or inflicted a loss (or a risk of loss) on another. The term fraud is usually used to describe depriving someone of something by deceit, which might either be straight theft, misuse of funds or other resources, or more complicated offences such as false accounting and the supply of false information. Some common types of fraud are set out at **Appendix C**.

**2.3.** Fraud may also be cyber-enabled or digitally facilitated, including misuse of information systems to dishonestly manipulate data, digital identity misuses and the AI-generated forgeries. Threads include phishing, payroll diversion, credential theft and forged electronic document. Further guidance on IT security is provided in BSO's Cyber Policies and Standards.

**2.4.** Legislation relevant to fraud includes the Theft Act (NI) 1969, the Theft (NI) Order 1978 and UK Bribery Act 2010, which clarifies the law in relation to bribery and corruption. This Policy also takes account of the Online Safety Act 2023 and Procurement Act 2023, relevant to cyber-enabled and procurement – related fraud risks.

### **3. BSO POSITION ON FRAUD**

**3.1.** The BSO Board is committed to maintaining an anti-fraud culture in the organisation so that all staff who work in the BSO are aware of the risk of fraud, of what constitutes a fraud and the procedures for reporting it. The BSO adopts a zero-tolerance approach to fraud and will not accept any level of fraud within the organisation. It is also BSO policy that there will be a thorough investigation of all allegations or suspicions of fraud

and robust action will be taken where fraud is proven in line with the BSO's Fraud Response Plan which is appended to this policy at **Appendix A** together with BSO Fraud reporting flowchart as set out at **Appendix B**.

**3.2.** BSO Board encourages anyone having reasonable suspicions of fraud to report it in line with the BSO Fraud Response Plan. It is the policy of the BSO, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes "reasonably held suspicions" shall mean any suspicions other than those that are raised maliciously. **BSO management will respond in these circumstances in line with its procedures.** Further guidance on the protection afforded to staff is contained in the BSO's policy on Raising a Concern in the Public Interest (Whistleblowing).

**3.3.** Cases referred to **Counter Fraud Services (CFS)**, will be subject to a Preliminary Enquiry and where appropriate, to the full investigation. Following such investigation, and when the circumstances so warrant, the matter may be referred by the Management to the Police Service Northern Ireland (PSNI) for the purpose of considering a criminal proceeding. Any decision to involve the PSNI in CFS fraud investigations will be made by the FLO. The BSO will seek to recover any losses arising from the fraudulent activity and may, where appropriate, take disciplinary action which may result in dismissal.

**3.4.** BSO has adopted the Departmental Counter Fraud Strategy as the basis for its anti-fraud activities. The key elements of this Strategy are as follows:

1. Engage and Educate

- Continued promotion of an anti-fraud culture
- All staff to play their part in effective prevention and prompt detection of fraud
- Sharing of knowledge and learning

2. Prevent and Detect

- Operating a collaborative approach to fraud awareness activity
- Promoting use of risk assessments to identify and reduce potential fraud risks
- Continuous improvement of systems and controls

3. Investigate and Sanction
  - Professional investigation of suspected fraud
  - Working collaboratively to obtain best outcomes
  - Taking all necessary steps to enable enforcement action including imposing appropriate sanctions whether disciplinary, criminal, civil or financial recovery
  
4. Monitor and Review
  - Monitoring evolving fraud trends and acting to update policies and procedures to ensure best practice approach in prevention and detection of fraud
  - Departmental commitment to regular review and monitoring of the effectiveness of the regional Counter Fraud Action Plan to measure progress

#### **4. FRAUD PREVENTION AND DETECTION**

- 4.1. BSO supports the role of its Counter Fraud and Probity Services Department (CFPS) and ensures that appropriate fraud prevention and detection measures are implemented in accordance with guidance issued.
  
- 4.2. BSO has implemented a range of policies and procedures that are designed to ensure probity, business integrity and minimise the likelihood and impact of incidents of fraud arising, including mandatory fraud awareness training (with refresher training every two years), internal control processes, consideration of fraud risks when designing new systems.
  
- 4.3. BSO also has a robust Internal Audit service which is actively involved in the review of adequacy and effectiveness of internal control systems thereby further deterring opportunity for and likelihood of fraud occurring.
  
- 4.4. BSO participates in the **National Fraud Initiative (NFI)**, which promotes the proper spending of public money. Under this initiative BSO may share information in relation to payroll, pensions and trade creditors with other bodies responsible for auditing or administering public funds to prevent and detect fraud. Regular progress updates are

provided to the Governance and Audit Committee. Further details on the Initiative can be found on the [National Fraud Initiative | Northern Ireland Audit Office \(niauditoffice.gov.uk\)](https://niauditoffice.gov.uk)

## **5. KEY RESPONSIBILITIES**

It is mandatory for BSO to report all suspected or actual fraud to CFS. This responsibility is formally undertaken by the Fraud Liaison Officer (FLO); however, preventing or detecting fraud is a shared duty across the organisation and all staff have an essential role to play.

### **5.1. Chief Executive**

The Chief Executive, as the Organisation's Accounting Officer, is responsible for:

- Ensuring effective fraud- risk assessment
- Maintaining up-to-date Fraud Policy and Fraud Response Plan
- Supporting a strong anti-fraud culture
- Ensuring staff understand their responsibilities in respect of fraud

### **5.2. Director of Finance**

The Director of Finance has delegated overall responsibility for managing the BSO fraud risk to include the establishment and monitoring of the organisational Fraud Policy via the Fraud Response Plan in line with BSO Standing Orders and Standing Financial Instructions.

The Director of Finance will work in conjunction with the Assistant Director of Counter Fraud and Probity Services on all fraud matters relating to BSO and the Director of Human Resources on disciplinary matters emanating from any fraud case. When required, advice may be sought from the Chief Legal Adviser. The Director of Finance is supported in the role by other senior managers who hold operational responsibility for particular business areas, programmes and projects.

### **5.3. Fraud Liaison Officer (FLO)**

**The FLO is BSO's key contact for fraud matters and is responsible for:**

- Coordinating all Preliminary Enquires and fraud referrals to CFS
- Promoting and supporting enforcement of BSO's anti-fraud culture and zero - tolerance approach to fraud
- Liaising with CFS and with the individual or body reporting the alleged fraud to ensure that all necessary actions are undertaken by BSO in a timely and appropriate manner
- Providing regular update regarding actual or potential fraud to the BSO Governance and Audit Committee.
- Ensure organisational compliance with departmental fraud reporting requirements
- Coordinating BSO's participation in and reporting of counter fraud initiatives such as the National Fraud Initiative.

#### **5.4. Governance and Audit Committee (GAC)**

The Governance and Audit Committee (GAC), on behalf of BSO Board reviews:

- Fraud policy and procedure as required
- Fraud Response Plan compliance
- Regular updates on fraud cases either potential or actual presented by the FLO
- BSO participation in the National Fraud Initiative (NFI)

#### **5.5. Counter Fraud Services (CFS)**

Counter Fraud Services delivers a comprehensive fraud service which includes **Preliminary Enquiries and investigations** to its HSC Clients. In the first instance all suspected or actual frauds will be reported to CFS who undertake preliminary enquiries on behalf of their clients, including the BSO. If it is decided that the case warrants a full investigation the case will be further referred to CFS.

All investigations undertaken by CFS are required to comply with all statutory obligations including those specified in:

- Police and Criminal Evidence (Northern Ireland) Order 1989,
- Criminal Procedure and Investigations Act 1996,
- Investigatory Powers Act 2016,

- Freedom of Information Act 2000
- Data Protection Act 2018
- Human Rights Act 1988
- Economic Crime and Corporate Transparency Act 2023

## **5.6. Internal Audit**

The BSO's Internal Audit assesses the effectiveness of internal controls and assists in preventing fraud by highlighting any weaknesses in systems and processes for organisational action.

## **5.7. BSO Employees**

BSO staff must uphold, and be seen to uphold, the highest ethical and personal standards. All employees are required to act honestly, objectively and professionally in the performance of their duties and in their use of official resources.

Staff conduct is guided by the Seven Principles of Public Life, as set out in the first report of the Nolan Committee Standards in Public Life:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

Every member of staff is responsible for ensuring their behaviour reflects these principles and supports the organisation's commitment to high standards of public service.

Managing a proactive approach to fraud detection is essential to protecting public funds and safeguarding organisational integrity.

Staff are expected to consider whether any personal, financial or business activities could conflict – or be perceived to conflict - with their duties to the organisation. Any actual or potential conflict of interest must be reported to the Chief Executive or Director of Finance for inclusion in the Register of Interests.

The paragraphs that follow outline in detail the key responsibilities of all staff in relation to the reporting and management of fraud. These responsibilities apply to all employees, regardless of grade or function, and for an essential part of the organisation's overall governance and assurance framework.

All staff must remain vigilant to the possibility that unusual events or transactions may indicate attempted or actual fraud. Employees are required to:

- Be alert to potential indicators of fraud
- Report any concerns, suspicions or known instances of fraud to management without delay
- Assist in the investigation into suspected fraud, where requested
- Liaise with CFS/PSNI as required

### **Line Managers**

Managers have primary responsibility for:

- Implementing controls to deter and detect fraud
- Ensuring staff understand reporting routes
- Supporting staff who raise concerns

### **Individual Staff**

Individual members of staff have an important role to play in combating fraud. Their responsibilities include:

- Awareness of the organisation's Fraud Policy and what part they are expected to play in it
- Awareness of the organisation's Fraud Response Plan
- Awareness of the organisation's Raising a Concern in the Public Interest (Whistleblowing) Policy
- Completion of fraud awareness training

- Reporting any suspicions, they may have where HSC resources are not being used for the correct purpose
- Reporting any suspicions of patients presenting for free HSC treatment when they are not eligible for same
- Acting with propriety in the use of official resources and in the handling and use of corporate funds whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers
- Reporting details immediately to their line manager or through another avenue for reporting fraud (e.g. raising a concern arrangements) if they suspect that fraud has been committed or see any suspicious acts or events
- Conducting themselves in accordance with the Code of Conduct.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud
- Cooperating fully with CFS in respect of any enquiries.

## 6. AVENUES FOR REPORTING FRAUD

BSO has available a number of avenues by which staff can raise suspicions of fraud. These are detailed in the BSO's Fraud Response Plan and Raising a Concern in the Public Interest (Whistleblowing) Policy. Staff may report concerns in the following ways:

- initially to the appropriate line manager
- to the Director of Finance
- through Fraud Liaison Officer FLO (Tina Steele 028 9536 3712/ [BSOFLO@hscni.net](mailto:BSOFLO@hscni.net) )
- using the "Raising a Concern" form on the BSO website
- the Raising a Concern phonenumber: **0800 096 33 96, where concerns can be raised in confidence and anonymously, if preferred**

All matters will be dealt with in confidence and in strict accordance with the **terms of the Public Interest Disclosure (Northern Ireland) Order 1998.**

Staff must not attempt to investigate suspected fraud themselves.

## **7. CONCLUSION**

Whilst the individual circumstances surrounding each fraud will vary, BSO takes all suspected or actual fraud cases very seriously and takes appropriate action, adopting a zero-tolerance approach. All reported suspicions will be fully investigated and robust action will be taken where fraud can be proven. This policy will be reviewed regularly to ensure it reflects new legislation, cyber-enabled crime, procurement regulations, raising a concern law and economic crime requirements.

# FRAUD RESPONSE PLAN

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## 1. INTRODUCTION

- 1.1. BSO is committed to the highest standards of probity, integrity and accountability in the use of public funds. The organisation operates a **zero-tolerance attitude to fraud, bribery and corruption**, in line with the principles set out by the **Northern Ireland Audit Office (NIAO)** and the **Department of Health (DoH)**. BSO is committed to fostering a culture where its staff demonstrate the highest standards of honesty, propriety and integrity in the exercise of their duties.
- 1.2. The BSO Board has overall responsibility for ensuring effective arrangements are in place for the **prevention, detection, investigation and reporting of fraud**. All allegations or suspicions of fraud will be taken seriously, investigated thoroughly and robust action will be taken where fraud is proven.
- 1.3. BSO will work in partnership with Counter Fraud Services (CFS), to promote fraud awareness through fraud awareness e-learning, staff roadshows and targeted presentations for staff to improve awareness and understanding of the impact of fraud on Health and Social Care (HSC) services in Northern Ireland and provide guidance on how and where concerns should be reported.
- 1.4. The purpose of this Fraud Response Plan is to set out the mandatory procedures to BSO staff, that must be followed when fraud, bribery or corruption is suspected or detected. **The Director of Finance** has primary responsibility for implementation of this Plan and will ensure that the **Chief Executive** and **Governance and Audit Committee** are appropriately informed.
- 1.5. In accordance with BSO's Standing Financial Instructions, any employee who discovers or suspects a loss or irregularity of any kind to notify their **Line Manager** or **Head of Department**, who must inform their Director and the Director of Finance. Where there is evidence of deliberate action, the possibility of fraud must be considered.

1.6. In order to assist understanding of the fraud response process, a flowchart is provided at **Appendix B**. This document should be read in conjunction with the following BSO documents:

- BSO Fraud Policy
- BSO Raising a Concern in the Public Interest (Whistleblowing) Policy
- BSO Standing Financial Instructions
- BSO Cyber Policies and Standards

## 2. WHAT SHOULD BE REPORTED?

2.1. For the purpose of this Plan, **FRAUD** is defined broadly and includes deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, money laundering, concealment of material facts, collusion and abuse of position. Fraud involves dishonest intent to make a gain or inflict a loss (or a risk of loss) to another party.

2.2. Examples of common fraud risks are provided at **Appendix C**. The list is not exhaustive. Where uncertainty of fraud-related concerns exist, advice and guidance can be obtained from the **Director of Finance**, the **BSO Fraud Liaison Officer (FLO)** or **Counter Fraud Services (CFS)**.

2.3. **External Organisation's** actions of concern must also be reported, including:

- offers of bribes or inducement
- fraudulent (rather than erroneous) invoices
- allegations of corruption or deception by supplier

Under the **Bribery Act 2010**, a bribe is defined as *'a financial or other advantage intended to induce or reward the improper performance of a person's function or activity, where benefit could create a conflict between personal interests and business interests.*

2.4. BSO participate in the National Fraud Initiative (NFI), which promotes the proper spending of public money. Under this initiative data match checks are carried out in respect of payroll, pensions and trade creditors by nominated BSO staff. Following

these checks, if it is suspected that some fraud may have taken place these cases should be forwarded to FLO for referral to the CFS to undertake a Preliminary Enquiry.

### 3. SAFEGUARDS

3.1. BSO maintains a **Raising a Concern in the Public Interest (Whistleblowing) Policy** in line with DoH guidance, enabling staff and others to raise concerns in safely and confidentially. Protection is afforded where concerns are raised in good faith and without malice. This Policy is available [here](#) and on the BSO intranet site.

3.2. While individuals are encouraged to identify themselves when raising concerns, all anonymous allegations will be considered.

3.3. No action will be taken against individuals who raise concerns in good faith that are not substantiated. Malicious or vexatious allegations may result in disciplinary action.

### 4. WHAT SHOULD AN EMPLOYEE DO IF THEY SUSPECT FRAUD OR CORRUPTION?

4.1. All employees have a duty to report suspected fraud promptly in accordance with BSO Standing Financial Instructions.

4.2. Managers and staff must remain alert to:

- Unusual or unexpected events or transactions
- Weaknesses in internal control
- Potential collusion involving staff and third parties.

4.3. Concerns should normally be reported as soon as possible to the **Line Manager**, who must escalate to their **Director**, the **Director of Finance** and the **FLO**.

4.4. Where this is not appropriate, concerns may be raised directly with:

- Director of Finance on 028 9536 3835
- Fraud Liaison Officer (Assistant Director of Finance) on 028 9536 3712

- Confidential HSC Fraud “Raising a Concern” line on **0800 096 33 96**
- BSO website - [online](#) reporting
- In writing to:

**Counter Fraud and Probity Services  
Business Services Organisation  
2 Franklin Street BELFAST BT2 8DQ**

## **5. WHAT SHOULD A MEMBER OF THE PUBLIC DO IF THEY SUSPECT FRAUD OR CORRUPTION?**

Members of the public who suspect fraud involving BSO, its staff or contracts, are strongly encouraged to report concerns via:

- Confidential HSC Fraud Raising a Concern line on **0800 096 33 96**
- BSO website - [online](#) reporting
- In writing to:

**Counter Fraud and Probity Services  
Business Services Organisation  
2 Franklin Street  
BELFAST BT2 8DQ**

## **6. ACTIONS TO BE TAKEN WHEN SUSPICION ARISES**

6.1 Any allegation of potential or actual fraudulent activity must be reported immediately to the relevant **Line Manager or Director**, who must **inform the FLO**.

6.2. The FLO will notify CFS by completing the PE form via **REFRAIN** portal without delay.

6.3. CFS hold responsibility for conducting preliminary enquiries for all HSC organisations.

6.4. Additionally, CFS will report to Department of Health (DoH), Department of Finance (DoF) and Northern Ireland Audit Office (NIAO) all suspected or actual frauds, arising within HSC.

6.5. The outcome of the preliminary enquiry will be communicated to the FLO and where the fraud is not substantiated, the case will be closed with appropriate documentation retained.

6.6. If the Preliminary Enquiry confirms that a fraud is suspected or confirmed, the CFS Investigating Officer will keep the FLO apprised and depending on the circumstances of the suspected fraud, immediate action will be taken to:

- prevent further loss,
- strengthening controls,
- changing procedures or processes
- suspending any payment and/or processes

6.7 Internal Audit may be consulted for advice and assistance on matters relating to internal controls, if required.

6.8 The **Director of Human Resources** will determine whether suspension of any individuals is appropriate in line with HR policy.

6.9 The information collected will be used to learn from the experience of others and encourage good practice.

## **7. PROCEEDING TO FULL INVESTIGATION**

7.1. Following the Preliminary Enquiry (PE), CFS will propose recommendations to the FLO as to the appropriate action. The FLO will review the matter and, if it recommends an investigation, the FLO will sign and return the PE1 Form authorising CFS to proceed with an investigation.

7.2. The FLO will provide regular progress updates to the Director of Finance and the Governance and Audit Committee, in line with the BSO Standing Financial Instructions and good governance practice.

7.3. Where appropriate, staff will be informed of the outcomes by the FLO, without prejudicing disciplinary action or criminal proceedings that may arise from the investigation.

## **8. PROTECTION OF DOCUMENTS**

If preliminary investigations indicate attempted or actual fraud, then the relevant Director must immediately take steps to prevent the potential destruction of evidence and ensure that all original documentation is retained in a safe place for further investigation. If the removal of documentation would impair the efficient operation of work, arrangements should be made to have copies available for continued use. Safe storage of original documents is essential in the event of any potential future legal action.

## **9. INTERVIEWING**

9.1. Fraud investigations are a specialist field and staff responsible for conducting the investigation should have appropriate experience and training therefore all interviews under caution will be conducted by PSNI.

9.2. When fraud is suspected, an interview may be necessary to initiate disciplinary and/or criminal proceedings. Where disciplinary action is necessary, interviews should be carried out by the appropriate line manager in conjunction with a representative from the Human Resources Directorate. In such circumstances, it is essential that specialist personnel advice is sought on the appropriate disciplinary procedures before conducting the interview.

9.3. Where criminality is suspected, interviewing of suspects must be left to the PSNI and not carried out by any other member of BSO staff. If the conditions of the Police and

Criminal Evidence (NI) Order 1989 (PACE) are not complied with, evidence will not be admissible in Court.

## **10. REFERRAL TO THE POLICE SERVICE FOR NORTHERN IRELAND (PSNI)**

### **10.1. Referral via CFS Investigation**

Where it appears that a criminal offence may have been committed, the matter, in the first instance, will be referred to CFS for Preliminary Enquiries. Any decision to involve the PSNI in CFS fraud investigations will be made by the FLO, based on recommendation from CFS. A Memorandum of Understanding (MoU) between the NI Public Sector and the PSNI has established Acceptance Criteria that must be met before a case is referred to PSNI for action. The decision to accept a case for investigation rests solely with PSNI, who will confirm their decision in writing. CFS acts as the key liaison with PSNI on behalf BSO with regards to fraud cases which are under investigation. Where necessary, BSO may seek advice from its Directorate of Legal Services. If PSNI involvement is required, CFS will undertake the initial liaison in relation to the investigation. The relevant Business Area Lead Officer may be contacted by PSNI to discuss the case and/or provide any further evidence required.

### **10.2. Direct Reporting to PSNI (outside full CFS Investigation e.g. thefts)**

On:

- initial discovery of a suspected or actual fraud, or
- following completion of a CFS preliminary enquiry,

**BSO management may report the case to PSNI.**

In this instance, where the case is not under full investigation by CFS, responsibility for reporting rests with the relevant business area and a Crime Reference Number must be obtained and provided to the FLO and CFS.

Fraud cases can be reported to the PSNI via:

- [Report Fraud website](#), or
- By phone **0300 123 2040**.

If in doubt, staff should contact the BSO FLO or CFS for advice.

10.3. Evidential packages provided to the PSNI will be provided by the CFS and should contain a detailed summary of all relevant information surrounding the allegations made.

## **11. FINDINGS OF THE FULL INVESTIGATION**

11.1. The Director of Human Resources will determine whether any members of staff should be subject to disciplinary action as a result of the findings during or after the investigation and will initiate any such action.

11.2. The FLO will notify the Governance and Audit Committee of the fraud following the initial investigation, will regularly update the Committee on progress and will formally report on the outcome of the investigation.

## **12. RECOVERY OF LOSS**

12.1. Preventing further loss and recovering any losses incurred is the primary outcome of any fraud investigation undertaken on behalf of BSO. The Director of Finance shall ensure that in all fraud investigations, the amount of any loss shall be quantified. In all cases, recovery of losses must be pursued.

12.2. Legal advice should be obtained without delay and consideration should be given on the potential to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should be obtained on the prospects for recovering losses through the civil court, should the suspect refuse to repay the loss. The BSO may seek to recover costs in addition to any losses.

12.3. The Director of Finance will ensure that any loss incurred as a result of the fraud is recorded in the BSO's **Register of Losses** in line with Circular HSC (F) 18-2025.

### **13. ACTING ON LESSONS LEARNED FROM THE INVESTIGATION**

- 13.1. Upon completion of a fraud investigation, the FLO shall discuss the need for a Lesson Learned Report with the Lead Officer within the relevant business area, CFS and, where appropriate, with the Head of Internal Audit, and arrange its completion as necessary. The purpose of the report is to identify any system, control or procedural weaknesses arising from the investigation. A suggested template is as set out in **Appendix D**. Agreed lessons learned must be communicated to the relevant officers and disseminated across the organisation as necessary.
- 13.2. The FLO, in conjunction with the Director of Finance, is responsible for ensuring that appropriate and timely amendments to procedures, controls and working practices are implemented by responsible officers to address identified weaknesses.
- 13.3. Where considered necessary, the Director of Finance may initiate a follow-up examination of the relevant areas to ensure the revised procedures and controls have been implemented and are operating effectively.

### **14. PUBLIC RELATIONS**

- 14.1. The Director of Finance in conjunction with CFS will collaborate with the DoH Press Office as appropriate on any public relations work arising from the findings of investigations.

Where appropriate, the Director of Finance, in conjunction with the Director of Human Resources, will decide whether the findings of the investigation need to be conveyed to other members of staff within the wider organisation

**COLOUR CODE FOR RESPONSIBILITIES**

INDIVIDUAL

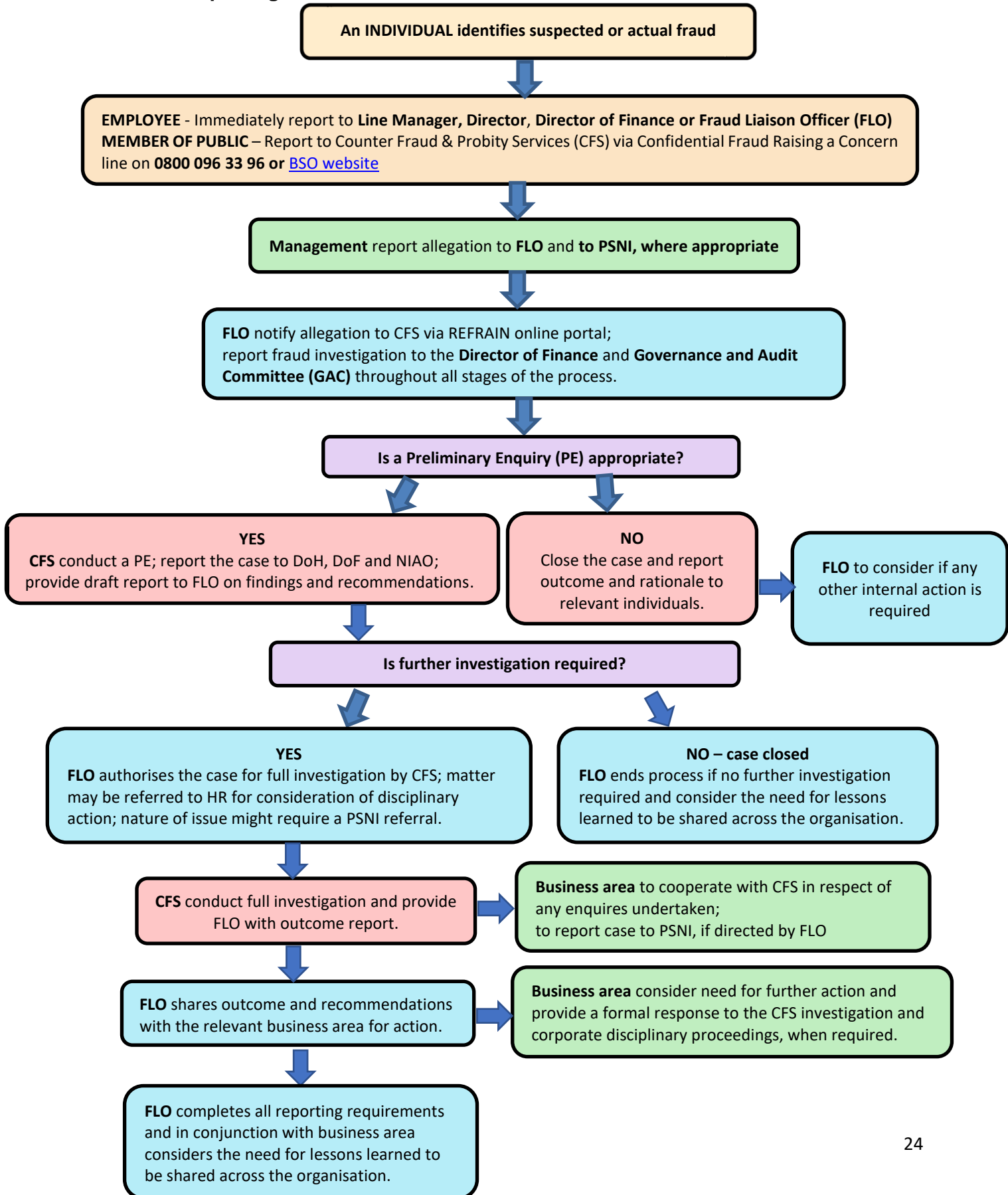
MANAGEMENT

FLO

CFS

**Appendix B**

**BSO Fraud Reporting Process Flowchart**



## Appendix C

### Common types of fraud in Health and Social Care (HSC)

#### 1. Procurement and Contract Fraud

- Fictitious or inflated invoices
- Bid-rigging and collusive tendering
- Claims for goods / services not received
- Overcharging for goods/ services
- Manipulated specifications to favour a supplier
- Accepting money or gifts for awarding contracts
- Offering personal incentives to secure contracts

#### 2. Payroll and Workforce Fraud

- Abuse of flexi time
- Submitting false claims (travel, subsistence or work)
- Working whilst on sick leave
- “Ghost employees” – paying wages to staff who don't exist
- False qualification – using fake credentials to obtain a job or higher pay

#### 3. Patient - Related Fraud

- Prescription fraud – obtaining or selling medication illegally
- Using another person's identity to access treatment or drugs
- Claiming free or reduced dental/ophthalmic treatment when not entitled
- Receiving free treatment when not entitled (e.g. not ordinarily resident in Northern Ireland)
- Charging patients privately while claiming reimbursement under health service regulations
- Claiming for services or treatments not provided
- Creating fictitious patients
- Substituting expensive drugs for a cheaper alternative and claiming for the supply of the more expensive brands
- Misappropriation of patient / client monies

#### **4. Asset & Resource Theft**

- Theft of equipment, drugs, IT assets, monies or general supplies
- Misuse of office equipment/stationery

#### **5. Cyber and Data Fraud**

- Phishing scams targeting staff
- Social engineering attacks
- Manipulation of electronic records
- Unauthorised access to system
- Forged digital documents (e.g. timesheets, qualifications)

#### **6. Financial & Billing Fraud**

- Billing for services not provided
- Double charging
- Claiming for more expensive procedure than delivered
- Fake or duplicate expenses claims
- Phantom patients or appointments

**This list is not exhaustive.**

## Appendix D

### FRAUD INVESTIGATION – LESSONS LEARNED TEMPLATE Business Services Organisation

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#### SECTION 1: CASE DETAILS (CONFIDENTIAL)

Item	Details
REFRAIN Case ID	
Directorate / Service Area	
Case Type	<input type="checkbox"/> Actual <input type="checkbox"/> Attempted but Prevented <input type="checkbox"/> Suspected
Estimated Financial Impact (£)	

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#### SECTION 2: SUMMARY OF THE ISSUE

**Brief description of the fraud, irregularity or control failure identified.**

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#### SECTION 3: ROOT CAUSE ANALYSIS / CONTROL WEAKNESSES IDENTIFIED

Identify the primary causes that enabled the fraud or control failure (tick all that apply and expand):

- Weak or ineffective internal controls
- Lack of segregation of duties
- Inadequate management oversight
- Poor compliance with procedures
- Insufficient training or awareness
- System or IT control weakness
- Override of controls
- External party failure
- Other (specify)

**Narrative explanation:**

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#### SECTION 4: LESSONS IDENTIFIED

*(What should have been in place?)*

List the key lessons arising from the investigation that are relevant across the business area / organisation.

- 1.
- 2.
- 3.

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**SECTION 5: ACTION PLAN**

Action Required

Responsible Officer

Directorate

Target Date

Status

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**SECTION 6: RISK & CONTROL ASSESSMENT**

Question	Yes / No	Details
Does this issue indicate a wider organisational risk?		
Has the Corporate Risk Register been updated?		
Has Internal Audit been notified (if required)?		

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**SECTION 7: FOLLOW-UP**

**How will management confirm actions have been implemented?**  
(e.g. management review, internal audit, system checks)

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**SECTION 8: COMMUNICATION & DISSEMINATION**

Audience	Method	Date
Senior Management Team		
Governance & Audit Committee		
Relevant Managers / Staff		
Organisation-wide (if appropriate)		
Other		

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**SECTION 9: SIGN-OFF**

I confirm that the lessons identified have been considered and appropriate actions agreed between the FLO and the business area as documented above.

Role	Name	Position	Signature	Date
Fraud Liaison Officer				
Business Area Lead Officer				

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**NOTES FOR COMPLETION**

- This template needs to be considered **for all confirmed frauds and significant attempted frauds**.
  - Completed templates must be retained in line with **records management requirements**.
  - Actions should be **tracked until fully implemented**.
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