



Fighting Fraud

**Safeguarding Every Pound
for Patient Care**

**Fighting Fraud Strategy for NHS Wales
2026 – 2030**



**GIG
CYMRU
NHS
WALES**

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Foreword

"I am pleased to be able to introduce this second iteration of the Fighting Fraud Strategy, first published in 2019. This strategy reinforces the focus on prevention as Fraud, bribery, and corruption threaten the very resources that keep NHS Wales running. Every pound lost to economic crime is a pound taken away from patient care and therefore this strategy is not just a document—it is a call to action because protecting NHS Wales from economic crime is everyone's responsibility.

The Welsh Government is unequivocal: economic crime against NHS Wales will not be tolerated. It is important to remember that these crimes are not victimless; they undermine trust and steal funding meant for frontline services. Together, we can protect these resources and hold offenders to account.

The approach in NHS Wales is clear:

- *to raise awareness to stop fraud before it starts.*
- *to strengthen controls and systems to prevent it.*
- *to pursue offenders and recover stolen funds for patient care.*

By making best use of intelligence, seeking out innovation and by developing our counter fraud workforce we can stay ahead of evolving risks exploited by criminals. Everyone plays a vital role.

You can make a difference when you:

- **Champion fraud awareness** within your teams and networks.

- **Report concerns promptly—every report matters.**
- **Embed strong controls** in your service area to support prevention.
- **Complete required training and engage with campaigns** to stay informed.
- **Stay vigilant and take proactive action** to reduce the risk of fraud in your area.

Your engagement is vital. A coordinated response which is strategic, tactical, and operational—will ensure NHS Wales is resilient against fraud.

I am proud to champion this work and confident this strategy will deliver real impact. Thank you to our dedicated staff and partners for your commitment to protecting NHS Wales. Together, we can protect the resources meant for patient care. Every action matters."



Jacqueline Totterdell
Chief Executive, NHS Wales

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Executive Summary

Fraud, bribery, and corruption are growing threats that divert vital NHS funds, increase costs, and erode public trust. Every pound lost is a pound taken from patient care.



Our Vision

To build a resilient, intelligence-led, and collaborative counter fraud culture across NHS Wales to ensure resources are protected for patient care.

Our Strategy

Our strategy focuses on proactive prevention, rapid detection, and decisive action to safeguard NHS resources.

- Prevent fraud before it happens.
- Detect and investigate swiftly.
- Apply sanctions and recover stolen funds.
- Build expertise and capability across NHS Wales.



How We Will Deliver

- Use intelligence to identify and target fraud risks.
- Raise awareness among staff, patients, and suppliers.
- Act decisively against offenders.
- Invest in staff training, tools, and resources to enhance effectiveness.



In the last five years, NHS Wales has applied 59 sanctions and recovered a total of £3,322,427, returning funds to patient care. Fraud risks are ever evolving—from procurement and contract fraud through to cybercrime—and we must stay ahead.

Fraud is one of the most prevalent crimes in England and Wales, and the National Crime Agency estimates that around 67% of reported fraud is cyber-enabled¹ and the NHS is a prime target. With NHS Wales processing billions of transactions and sensitive data, the stakes have never been higher.

This strategy builds on the previous *Fighting Fraud Strategy (2019)* recognising new and emerging risks. This strategy raises the bar with refreshed objectives and will be underpinned with a delivery plan and measurable indicators. It also aligns with UK-wide counter fraud strategies and Welsh Government priorities.

This strategy is our commitment to safeguarding every pound for patient care. Together, we will make NHS Wales resilient against fraud.

Fraud prevention is everyone's responsibility.

All NHS staff must remain vigilant and report any suspected fraud to their Local Counter Fraud Specialist or NHS Counter Fraud Services Wales.

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Strategic Objectives

To protect NHS Wales resources and maintain public trust, we must adopt a proactive and coordinated approach to tackling fraud. Our Strategic Objectives provide the foundation for this work, focusing on prevention, early detection, decisive response, and building the capability needed to stay ahead of evolving risks. By investing in our people, connecting intelligence, and strengthening collaboration with partners across Wales and the UK, we will create a resilient system that protects funding so it can be directed where it matters most—patient care.

Strategic Objective	Description
Prevent 	Assess the risk, strengthen systems and controls and promote awareness to stop fraud before it occurs.
Detect 	Use data, intelligence and advanced analytics to help prioritise resources and link fraud risks early.
Respond 	Investigate thoroughly, recover losses, and apply appropriate sanctions swiftly.
Build Capability 	Invest in our people by providing specialist training and equipping counter fraud teams with latest tools and technology.
Collaborate 	Foster strong partnerships across NHS Wales, other Welsh public bodies, Welsh Government, and UK agencies such as HMRC and DWP to share intelligence and best practice.

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Key Enablers

Delivering our Strategic Objectives requires more than intent—it requires investment in the right tools, skills, and partnerships.

This includes:

- the Welsh Government Directions, which establish the legal framework for the responsibilities and functions of NHS Counter Fraud services across NHS Wales, including requirements for cooperation with partners; and
- the local counter fraud specialists and the national counter fraud service across NHS Wales, whose ongoing and collaborative work -enabled by these Directions - forms a core enabler of effective prevention, detection, and response. Their contribution will be fundamental to delivering the objectives set out below.

To strengthen NHS Wales’ resilience against fraud, we have identified a set of **Key Enablers** that will underpin our approach. These enablers provide the infrastructure, technology, and expertise needed to prevent fraud, detect risks early, respond effectively, and build capability across the system. By aligning each enabler with our objectives, we ensure a clear, coordinated path to success.

Strategic Objective	Key Enabler	Impact
Prevent 	Functional Standards: Benchmarking & Assurance. Counter Fraud Culture: Led from the top, fostering a proactive, NHS-wide culture that empowers everyone to prevent fraud and manage risk effectively. All NHS employees should complete the e-learning Fraud Awareness training module.	Sets clear benchmarks for counter fraud activity and provides assurance that controls are robust and effective and that standards are being met across NHS Wales. Building a strong anti-fraud culture increases awareness and helps identify fraud risks early. Prevention through good practice is the most effective way to reduce fraud in the NHS.

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Strategic Objective	Key Enabler	Impact
<p>Detect</p> 	<p>Encourage all staff and stakeholders to report fraud whenever they have a concern.</p> <p>Collaborative approach to Risk Assessments and use of Data Analytics & AI.</p>	<p>Enables early identification of fraud risks through use of data analytics and AI driven tools to improve intelligence-led decision-making across Wales, enabling a proactive and front-footed response to both existing and emerging threats.</p>
<p>Respond</p> 	<p>Digital Forensics, CLUE System & Proceeds of Crime Act 2002.</p> <p>Investment in investigative resources and training.</p>	<p>Delivers enhanced investigation tools for robust evidence gathering, case management, and recovery of stolen funds.</p>
<p>Build Capability</p> 	<p>Continuous professional development through the Centre for Specialist Learning.</p>	<p>Provides professional development, specialist training, and accreditation to strengthen counter fraud capability and to equip staff with the skills needed to tackle evolving fraud risks.</p>
<p>Collaborate</p> 	<p>Counter Fraud Liaison Group. Counter Fraud Steering Group. Directors of Finance Group.</p>	<p>Promotes operational collaboration, sharing of best practice, and consistency across Health Boards, Special Health Authorities and Trusts.</p>

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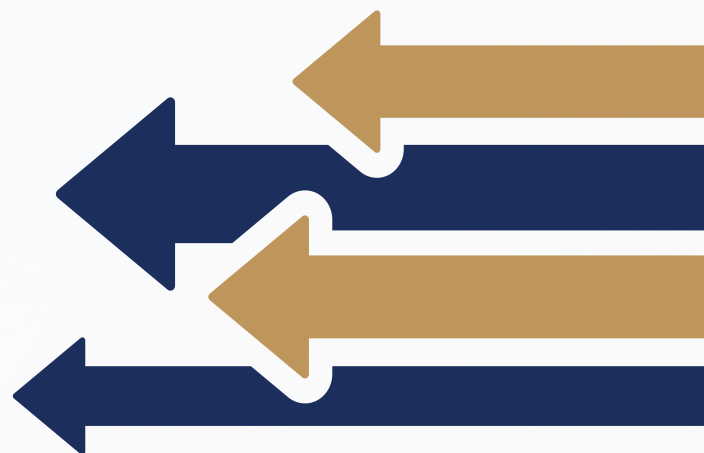
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Priorities for Action

Accountability and progress tracking are central to this strategy. Each Strategic Objective will be monitored against planned actions, with regular reporting to the Counter Fraud Steering Group and Welsh Government. This ensures transparency, drives continuous improvement, and keeps NHS Wales focused on safeguarding resources for patient care.

Together, the following planned actions will create a proactive, coordinated system that safeguards NHS resources and ensures funding is directed to patient care.



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Strategic Objective	Description	What will 2030 and beyond look like
<p>Prevent</p> 	<p>To reduce opportunities for fraud before they arise, we will strengthen assurance frameworks and embed fraud risk management across NHS Wales.</p> <p>We will:</p> <ul style="list-style-type: none"> • implement annual benchmarking reviews against Functional Standards, • develop local and national assurance dashboards, • implement a process for tracking actions and follow up of national proactive exercises. • undertake fraud risk assessments using a consistent and efficient methodology • publish an annual Counter Fraud Assurance Report. <p>These measures will set clear expectations and provide transparency on progress.</p>	<p>Fraud risk management will be embedded into everyday processes, making it a standard part of governance and decision-making rather than a reactive measure.</p> <p>Staff across NHS Wales will have a clear understanding of fraud risks and their role in mitigating them.</p> <p>Local and national dashboards will provide real-time visibility of fraud risk indicators, enabling quick interventions and informed decision-making.</p>

<p>Detect</p> 	<p>Early detection is critical to minimising financial loss and protecting patient care.</p> <p>We will:</p> <ul style="list-style-type: none"> • deploy advanced data analytics and AI-driven tools to identify anomalies in financial transactions, • integrate fraud risk indicators into core systems, • establish a central data-sharing protocol to enhance intelligence across NHS Wales. <p>Quarterly fraud trend analysis will inform proactive interventions and ensure resources are directed where they are most needed.</p>	<p>Predictive models identify emerging fraud risks before they materialise, enabling pre-emptive action.</p> <p>A secure, NHS Wales-wide data-sharing protocol ensures that intelligence from one health organisation is instantly available to all others.</p> <p>Patterns of fraud detected in one region inform preventive measures everywhere, creating a network effect of protection.</p>
<p>Respond</p> 	<p>When fraud occurs, we must act decisively and recover stolen funds.</p> <p>We will:</p> <ul style="list-style-type: none"> • work with the NHS CFA to enhance the case management system to improve investigation efficiency, • put in place arrangements for counter fraud specialists to access data analytics expertise, • implement a rapid response protocol in collaboration with national and local Cyber teams for cyber-enabled fraud incidents. <p>Recovery methods and achievements will be monitored to ensure accountability and continuous improvement.</p>	<p>The case management system is fully enhanced, enabling investigators to manage cases seamlessly, track evidence, and collaborate across health organisations in real time.</p> <p>A rapid response protocol is triggered immediately when cyber-enabled fraud is detected—like an emergency response system.</p> <p>NHS Wales publishes transparent recovery data, reinforcing public trust and demonstrating continuous improvement.</p>

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<p>Build Capability</p> 	<p>A skilled and knowledgeable workforce is essential to staying ahead of evolving fraud risks.</p> <p>We will:</p> <ul style="list-style-type: none"> • deliver structured CPD programmes, • introduce career pathways including technician roles and consider secondment opportunities with NHS CFA in areas such as data analytics and digital forensics, • Require all NHS Wales employees to complete the e-learning fraud awareness module. <p>Annual Counter Fraud Conferences will provide opportunities to share best practice and emerging trends.</p>	<p>Counter fraud roles have clear career pathways, including technician-level positions and advanced roles in analytics and digital forensics.</p> <p>The e-learning fraud awareness training is accessible to all NHS Wales employees—from clinical staff to executives. Increased awareness helps to reduce fraud.</p> <p>Annual Counter Fraud Conferences are major events, bringing together experts, health organisations, and other partners to share best practices and emerging trends.</p>
<p>Collaborate</p> 	<p>Fraud prevention and detection require strong partnerships. The Counter Fraud Steering Group will work with Directors of Finance and the Counter Fraud Liaison Group to drive operational collaboration, share intelligence, and promote consistency across Health Boards, Special Health Authorities, and Trusts.</p> <p>We will:</p> <ul style="list-style-type: none"> • strengthen the sharing of intelligence across Wales, between the four nations and other public bodies including police forces, • publish joint guidance documents, • and establish cross-organisation arrangements, working with the NHSCFA to tackle high-risk areas such as procurement and cybercrime. 	<p>Collaboration is no longer ad hoc—it's structured, consistent, and strategic, ensuring alignment across the entire NHS Wales system.</p> <p>Enhanced intelligence sharing across the UK and public bodies enabling real-time access to fraud alerts, case updates, and emerging risk patterns. This shared intelligence helps identify cross-organisational trends early, allowing faster and more coordinated action.</p> <p>NHS Wales publishes standardised guidance documents co-developed by all partners, ensuring consistency in fraud prevention and response.</p>

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Key Outcomes by 2030

1

Fraud prevention is system-wide, not siloed—intelligence flows freely, and responses are coordinated.

2

NHS Wales is recognised as a leader in collaborative fraud prevention, influencing UK-wide policy.

3

Public confidence is strengthened because the system demonstrates collaboration, transparency, and effectiveness.

Staff Responsibility

Fraud prevention is everyone's responsibility.

All NHS staff must remain vigilant and report any suspected fraud to their LCFS or CFSW.

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Governance Structure

Strong governance is essential to ensure accountability, consistency, and effectiveness in tackling fraud across NHS Wales. This governance structure provides a clear line of accountability from local services through to national oversight, ensuring NHS Wales remains resilient against fraud risks and focused on protecting resources for patient care.

Counter Fraud Steering Group (CFSG)

The CFSG provides strategic oversight of counter fraud services across NHS Wales and advises Welsh Government on actions and opportunities for improvement.

Meetings: Quarterly

Chair: NWSSP Director of Finance and Corporate Services

Membership:

- Welsh Government representative
- NHS Wales Finance Directors
- Audit Committee Chairs
- NHS Counter Fraud Authority
- Head of Counter Fraud Services Wales
- Chair of the Counter Fraud Liaison Group
- Audit Wales (Observer)

The CFSG ensures alignment with national priorities, reviews performance, and recommends enhancements to strengthen fraud prevention and detection.

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Counter Fraud Liaison Group

Established in 2025, this group brings together Local Counter Fraud Specialists (LCFS) and NHS Counter Fraud Services Wales. Its primary purpose is peer to peer support and to share best practice, promote consistency, and support operational delivery across Health Boards, Special Health Authorities and Trusts.

Members report direct to their respective Director of Finance and can collectively raise common issues and opportunities through the Directors of Finance Group to raise with the Counter Fraud Steering Group. The Chair and Vice Chair also attend the Counter Fraud Steering Group meetings.

Local Governance

Operationally, local counter fraud specialists report to Finance Directors and are monitored by Audit Committees within each NHS body. These Committees review annual work plans, progress reports, and outcomes to ensure robust oversight and accountability.

The Head of Counter Fraud Services Wales provides professional support, direction and strong leadership to the network of local counter fraud specialists within NHS bodies in Wales as well as operational line management of the NHS Counter Fraud Services Wales team. They advise NHS Wales Directors of Finance and Welsh Government officials, and work in close partnership with the NHS Counter Fraud Authority, National Crime Agency, regional police forces, HMRC, and the Department for Work and Pensions.

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Quality Assurance

The quality of counter fraud services within NHS Wales is assessed against the Government Functional Standards 013 Counter Fraud, facilitated by the NHS Counter Fraud Authority (NHSCFA) and adopted across NHS Wales.

These standards ensure that measures to prevent, detect, and respond to fraud, bribery, and corruption are implemented in line with the Cabinet Secretary for Health and Social Services' Directions and the Service Level Agreement between Welsh Government and the NHSCFA.

Purpose of the Standards

The Functional Standards provide a consistent framework to:

- Embed robust counter fraud controls across NHS Wales.
- Ensure compliance with statutory and contractual obligations.
- Deliver transparency and accountability in fraud prevention and detection.

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Quality Assurance Programme

The programme comprises **two core processes**:

1. Assurance

- Each NHS organisation completes an annual self-review against the Functional Standards.
- Results are reported to the NHS organisation's Audit Committee and submitted to the NHSCFA for analysis and thereafter to the UK Government.
- This process ensures compliance, highlights areas for improvement, and supports continuous development.

2. Assessment

- The NHSCFA Quality and Compliance team conducts independent assessments.
- Using the Self-Review Tool, supporting evidence, and inspection procedures, the team evaluates:
 - **Counter fraud resources.**
 - **Performance against standards.**
 - **Effectiveness of implemented controls.**
- Any recommended improvements should be addressed promptly, to maintain high standards and strengthen capability.

Governance Reviews

In addition to above Quality Assurance Programme the Counter Fraud Service Wales (CFSW) team undergoes a cyclical governance assurance review conducted by the NHSCFA, ensuring alignment with national standards and best practice.

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Local Counter Fraud Specialists

The Welsh Government Directions on Counter Fraud require every Health Body to appoint qualified Local Counter Fraud Specialists (LCFS), accredited by the Counter Fraud Professional Accreditation Board or equivalent. There are 23.38 whole time equivalent (WTE) LCFS staff in Wales, all directly employed by NHS bodies.

LCFS act as the primary point of contact for all economic crime concerns within their organisation. They agree annual work plans with their Health Body, balancing proactive activities (fraud awareness, risk assessment and detection) and reactive work (investigations), aligned to the Fraud, Bribery and Corruption Standards for NHS Bodies (Wales).

NHS Counter Fraud Services Wales (CFSW)

The NHS Counter Fraud Service Wales is an independent team funded by Welsh Government and employed by the NHS Wales Shared Services Partnership (NWSSP) hosted by Velindre University NHS Trust. It provides a specialist independent investigation resource to all health bodies in Wales and provides operational oversight on all counter fraud activities in NHS Wales, to ensure compliance with the Welsh Government Directions.

CFSW serves as the professional and strategic lead for NHS Wales on proactive and investigative counter fraud matters, promoting a consistent, high quality approach across health bodies in line with relevant legislation. Its experienced, accredited investigators manage large and complex economic crime cases, provide specialist guidance to the LCFS network, and are authorised to exercise financial investigation powers under the Proceeds of Crime Act 2002.

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Specialist Support from NHS Counter Fraud Authority (NHSCFA)

Under a Section 83 Government of Wales Act 2006 arrangement, NHSCFA provides specialist operational support services to NHS Wales, including Forensic Computing and Specialist Dental Services, funded via an annual Service Level Agreement with Welsh Government.

Other Key NHS Wales Functions Supporting Counter Fraud

- **Primary Care Services (PCS):** The Post Payment Verification (PPV) team check claims in General Medical, Ophthalmic, and Pharmacy services. Dental checks are delivered via NHS England Business Services Authority. These checks ensure claims are accurate and services meet NHS specifications. Any concerns are referred to LCFS or CFSW under an Information Sharing Protocol.
- **Audit & Assurance:** NWSSP Audit & Assurance provides internal audit services to all NHS bodies. While not directly responsible for detecting fraud, their work highlights control weaknesses and potential breaches. They collaborate with LCFS under an Information Sharing Protocol.
- **Auditor General for Wales:** External audits may uncover system weaknesses or fraud indicators. Regular liaison occurs between auditors, NHS bodies, Welsh Government and CFSW to address concerns.
- **National Fraud Initiative (NFI):** Led by the Auditor General under statutory powers, NFI matches data across public bodies every two years to identify anomalies. Since inception, NFI has uncovered £56.5M in fraud and overpayments across Wales, including £7.1M in the latest exercise.

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Reporting Fraud

Report NHS fraud securely and confidentially by using the [**NHS Counter Fraud Authority online reporting tool**](#) or by calling our free phone line on 0800 028 40 60.

Contact Details

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