

Public Audit and Post-Legislative Scrutiny Committee

National Fraud Initiative

Submission from NHS National Services Scotland

Post-Legislative scrutiny call for written submissions.

Introduction

NHS National Services Scotland is Scotland's largest shared services body, supporting Scotland's health by delivering shared services and expertise that help other organisations to work more efficiently and save money. We provide national strategic support services and expert advice to all of NHSScotland. We also play an active and crucial role in the delivery of effective healthcare to patients and the public.

Other than as a participating Board, NHS National Services Scotland does not have any direct role or responsibility with regard to the National Fraud Initiative (NFI), and therefore this response is based on premise.

Q.	What have been the benefits, financial and otherwise, of putting the National Fraud Initiative on a statutory footing?
A.	Not applicable, please see above statement. NHS National Services Scotland is only a participant body.
Q.	Could the legislation be strengthened in any way?
A	Yes. It is suggested that some purposive measures introduced to ensure participation and compliance, for example, in the timely provision of core data sets. It is not suggested that this be obstructive or punitive. An overall approach of willing voluntary participation above provision of datasets as suggested should continue.
Q	Should participation in the National Fraud Initiative be improved? Are there any bodies who do not participate in the National Fraud Initiative who should do so?
A	<p>Integrated Joint Boards are becoming responsible for the provision of more and more vital public services. Some consideration should be given to ensure that any new data sets are considered/provided, and that collaboration between the individual public authorities that make up the Integrated Joint Board is adequate to ensure governance arrangements are robust, assurance is provided on public expenditure and NFI is fully utilised along with other measures, to ensure fraud, error and loss is reduced to a minimum within these new and essential public authorities.</p> <p>Other bodies such as the Association of British Pharmaceutical Industry, could be considered as a participant body who could publish and provide data around payments, honorarium or hospitality, which is provided to public officials, for</p>

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	<p>consultancy/discretionary/advisory or educational services. It is always useful to have additional sources of information through a wider fraud landscape. The NFI could be extended to other bodies who engage in such activity, such as major research and development companies or companies with a dominant market position in key services such as IT, telecommunications or care services. This data could be matched against public authority employee/agency/contractors records to ensure transparency, and that deliberate failures or errors in compliance with policy and procedures are investigated appropriately.</p>
Q	<p>Are there any other issues you would like to raise in connection to this particular part of the legislation?</p>
A	<p>As the numbers of participating public and discretionary bodies may increase along with the data sets provided, and given the existing challenges regards resources and time to deliver core services, a longer lead in time could be considered, or a staggering of the NFI matching datasets, with less 'successful' matches being carried out less frequently and the more 'successful' matches targeted with relevant resources to investigate to an outcome.</p> <p>On the wider connected point, a strategic assessment of the matches and learning from the outcomes should now be considered given the length of time the NFI has now been in existence. This strategic approach may be codified into the statute or left as ancillary to it. This would help with an overall targeting of public authority resources and lead to more efficient investigation and potential recoveries or cessation of losses. It seems inefficient to continually find the same errors year after year. Strategic/operational assessments should be made and recommendations followed to increase resilience of systems and processes after each match.</p>