

**JOB DESCRIPTION**

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| **Job Title:**  | Senior Local Counter Fraud Specialist  |
| **Band/Pay:**  | Band 7  |
| **Department:**  | Financial Services/Directorate of Finance and Information  |

***ASW Assurance Counter Fraud Team Structure***

Counter Fraud Manager

Senior Local Counter

Fraud Specialist

Local Counter Fraud

Specialist

Senior Local Counter

Fraud Specialist

Local Counter Fraud

Specialist (Trainee A4C

annex U until December

2022)

Senior Local Counter

Fraud Specialist

Local Counter Fraud

Specialist (A4C annex U

applies)

Senior Local Counter

Fraud Specialist

# Job overview

As part of the NHS Contract organisations are required to have counter fraud arrangements in place to provide added value through the use of counter fraud specialists, the purpose of this role is primarily to manage, control and deliver highly complex counter fraud investigations and value-added proactive work to a number of organisations simultaneously.

Expectations of the post holder fall into distinct categories.

1. Work with multiple organisations to ensure and assist in the development of appropriate governance frameworks in place to reduce the risk of fraud at those organisations to an absolute minimum; ensure that those frameworks provide significant opportunity to detect and be able to prosecute fraud that occurs. The post holder is also required to respond to requests for information, expert advice and guidance from senior managers and regulators of multiple organisations.
2. Undertake proactive work including (but not limited to) educating staff at multiple organisations about fraud so that they are able to identify fraud and know how to respond correctly; undertake nationally directed proactive exercises and develop and deliver local risk based proactive exercises.
3. Undertake criminal investigations complying with the requirements of criminal investigation legislation (including but not exclusively, the Police and Criminal Evidence Act 1984, the Fraud Act 2006, Theft Act 1968, Criminal Procedure and Investigations Act 1996 and the Regulation of Investigatory Powers Act 2000). These investigations may be highly complex in nature and may involve the preparation of prosecution files for the Crown Prosecution Service. Where appropriate, the post holder will liaise with multiple HR departments, regulators and other organisations where the case includes disciplinary and/or professional conduct matters.
4. Act as lead specialist for counter fraud services on a portfolio of clients covering the planning, delivery and client liaison, including strategic and operational liaison with the Director of Finance.
5. Line manage Band 6 Local Counter Fraud Specialist and Trainee Local Counter Fraud Specialist Band 6 Annex U or be responsible for specialist areas of counter fraud work eg risk management, consortium wide local proactive work and complex investigations.

# Main duties of the job

The Senior Local Counter Fraud Specialist is responsible for a range of allocated ASW Assurance clients and the delivery of the operational counter fraud service to prevent, detect and investigate fraud, corruption and bribery in line with NHS Counter Fraud Authority (NHSCFA) requirements.

Assist the Counter Fraud Manager with managing and developing the counter fraud team, including the regular formal appraisal of performance, with a view to ensuring the most effective use of resources.

As a counter fraud expert, to develop, promote and maintain effective counter fraud arrangements for a portfolio of clients in accordance with the NHS Counter Fraud initiative, working at Board level, with NHSCFA and the Police.

Supervise and coach newer and less experienced colleagues in own work areas.

To work in partnership with ASW Assurance audit colleagues and other external agencies in the key areas of counter fraud work as set out in Government Functional Standard 13 relating to Counter Fraud. To ensure that all complex, high risk, material and sensitive issues identified are reported appropriately to the most suitable party (for example, Director of Audit and Assurance Services or Director of Finance, NHSCFA, police and Crown Prosecution Service).

Respond to and anticipate queries from clients, external agencies and members of the public, often highly complex, sensitive and confidential in nature across a diverse client base and action as necessary. Queries may relate to highly complex issues that require a detailed understanding of risk, NHS structures and existing guidance.

Identify and provide solutions to fraud risks in line with the Government Counter Fraud Profession Fraud Risk Assessment Methodology. Escalate risks in the event of insufficient mitigation and proactively track progress of fraud risk mitigation implementation.

Undertake the role of “Officer in charge” of investigations into allegations and suspicions of fraud against multiple organisations. Complying at all times with relevant legislation including the Police and Criminal Evidence Act 1984, Criminal Procedure and Investigations Act 1996 and the Regulation of Investigatory Powers Act 2000.

Provide coordination of, and participation in relevant internal and external working groups and provide project advice, expertise and support where requested.

Provide relevant and timely specialist advice and guidance on own portfolio of projects/function.

Work collaboratively with the Counter Fraud team and wider ASW Assurance teams to deliver agreed plans.

# About the ASW Assurance Counter Fraud team

As the main counter fraud service provider to the NHS in the South West, ASW Assurance provides an excellent, value added service, which meets and exceeds the delivery of both national and local NHS counter fraud requirements.

ASW Assurance work is focused to ensure that fraud risks that may prevent the achievement of NHS organisations strategic objectives are kept to a minimum. The counter fraud work is pivotal in ensuring that the organisation’s specific fraud risks are identified and managed to prevent financial loss and protect the organisation’s reputation. We also deliver specialised security management consultancy services, and can provide a comprehensive, joined up, resilient anti-crime service.

The Senior Local Counter Fraud Specialist (LCFS) focus is to:

* Implement and encourage an anti-fraud culture throughout organisations
* Provide operational leadership in delivering the counter fraud message to multiple organisations
* Take positive action against fraud, including sanctions against perpetrators and recovery of any monies defrauded
* Meet and exceed the NHSCFA requirements
* Achieve successful outcomes from both criminal and civil proceedings

**Detailed job description and responsibilities**

# Communication and working relationships

* Advise multiple organisations at executive and non-executive level on matters relevant to the post holder’s area of expertise
* Be the subject matter expert for advice and guidance at Board level for multiple organisations in the post holder’s area of expertise
* Provide and co-ordinate advice on organisational risks and issues to staff at all levels. This may include unique NHS circumstances where there are a number of competing and complex considerations that must be made without an obvious solution
* Be able to communicate the reasoning behind highly complex or contentious recommendations and persuade and negotiate with management leads to arrive at an agreed position
* Keep the Counter Fraud Manager regularly informed of issues relating to investigations, client work plans, proactive work and training matters
* Prepare high quality reports for use at Executive level within multiple clients on the commencement and completion of work (proactive and reactive) covering complex and detailed subject areas including highlighting system weaknesses and recommending improvements
* Maintain good working relationships with ASW Assurance audit staff, internal and external audit personnel from external organisations, NHSCFA and other agencies in the delivery of the fraud service. This is to ensure the most effective use of information and working arrangements which may involve join working
* Understand, review, update and promote client’s fraud-risk relevant policies to staff at all levels of multiple organisations
* Work collaboratively with colleagues in supporting services: financing, contracting, HR

# Planning and organisation

* Have responsibility for planning, leading, management and delivery of the counter fraud annual work plans for multiple organisations in line with the

ASW Assurance Business Plan and in collaboration with the ASW Assurance Counter Fraud Manager

* Prioritise and deliver on urgent conflicting priorities
* Contribute to the strategic planning of Counter Fraud team projects, identifying interdependencies across projects/functions, potential impacts on wider organisation, resource requirements and building in contingency and adjustments as necessary
* Contribute to the development of Counter Fraud relevant performance and governance strategies and the development and implementation of improvement programs, in accordance with organisational priorities
* Contribute to short, medium and long-term business plans, achieving quality outcomes in respect of ASW Assurance and multiple client organisations

# Analytical and judgement

* Undertake highly complex investigations in accordance with current legislation and NHS guidelines. The postholder is officially the Officer in Charge on investigations and has freedom to progress investigations and proactive work as they see fit. The postholder is expected to ensure that they maintain current and relevant knowledge of legislation, guidance and good practice relevant to NHS Counter Fraud
* Ensure that information obtained during proactive or reactive work is robust in order to interpret and make sound assessments and judgements that lead to effective recommendations to address system weaknesses and risk management
* Receive and evaluate complex data pertinent to developments in fraud and, using their own knowledge, skills and expert judgement decide and implement appropriate fraud resilience measures. This may take the form of undertaking checks anywhere within multiple organisations for instances of the fraud described and developing measures to improve fraud resilience for multiple organisations. The post holder will also work with executives, managers and staff to implement the proportionate and effective anti-fraud controls the post holder has developed

# Responsibility and accountability

* Be responsible for leading the counter fraud service within their nominated organisations including the formulation and delivery of agreed Counter fraud plans under the guidance of the Counter Fraud Manager to ensure optimum counter fraud prevention and detection is delivered across all services
* Be accountable to the Audit Committee and Director of Finance of multiple organisations, the NHSCFA and the ASW Assurance Counter Fraud Manager for the delivery of the Counter Fraud Service to multiple organisations
* Provide interim and annual reports to the Audit Committee and liaise with Directors of Finance of multiple organisations regarding progress against agreed Counter Fraud Workplans, progress of Counter Fraud investigations and proactive work in compliance with Government Functional Standard 13: Counter Fraud and implementation of recommendations. Advising on national strategy and trends
* Be responsible for the preparation of documents, data analysis, specifications and management of the Counter Fraud arrangements for multiple organisations

# Policy and service responsibility

* Be responsible for the development, implementation and maintenance of annual Counter Fraud work plans for multiple organisations
* Be responsible for the development, implementation and maintenance of the Counter Fraud, Bribery & Corruption Policy for multiple organisations
* Be responsible for providing specialist advice and guidance in key policy in other areas including (but not limited to) disciplinary, managing absence, standards of business conduct, procurement, recruitment and secondary/additional employment
* In collaboration with the Counter Fraud Manager, develop and provide long term planning of the Counter Fraud service for which they are responsible across multiple organisations
* Contribute to the review and development of existing information management systems and contribute to the development of an integrated approach to, service or initiative management
* Develop fraud related policies and procedures and advise on control systems to improve fraud resilience, as required
* Carry out regular reviews of investigations, Fraud Prevention Notices and risk registers ensuring that appropriate follow up action is taken to address and reduce the risk of fraud and disseminate learning points to appropriate staff groups
* Working with the CF manager in developing service wide policy and service improvement/development
* To travel independently to ASW Assurance clients, other locations and further afield sometimes at short notice to deliver the service in person when other methods are not appropriate

# Responsibility for finance, equipment and other resources

* Report regularly to Board level staff on use of valuable counter fraud budget and provide advice and guidance throughout the reporting year as situations develop to realign priorities, ensuring the most efficient use of resources
* Be professionally responsible for ensuring the effectiveness of financial systems across organisations through scrutiny of purchasing and highly complex procurement processes
* Have the lead responsibility of delivering the service to multiple nominated organisations. Therefore, must be able to correctly prioritise the complex financial arrangements within each organisation, share good practice and correctly advise each organisation on their financial arrangements to minimise losses to fraud and error
* Evaluate organisation-wide projects and functions within identified portfolio for delivery against financial recovery through providing high quality analysis as required by the Director of Finance and/or Audit Committee
* Initiate the recovery of any monies misappropriated through fraud and/or error
* Develop and implement projects designed to evaluate Trust spending and identify system improvement opportunities to create savings
* Responsibility for the delivery of the Cabinet Office project, the ‘National Fraud Initiative’ involving analysis of complex financial creditors and payroll data and recovery of monies lost to fraud/error, as well as taking formal action against those responsible
* Be responsible for the secure storage and use of equipment used to perform their duties

# Responsibility for supervision, leadership and management

* Act as lead specialist for counter fraud services on a portfolio of clients covering the planning, delivery and client liaison, including strategic and operational liaison with the Director of Finance
* Line manage Band 6 Local Counter Fraud Specialist and Trainee Local Counter Fraud Specialist Band 6 Annex U or be responsible for specialist areas of counter fraud work eg risk management, consortium wide local proactive work and complex investigations
* Participate in the management and coordination of training and development of team members and contribute to recruitment activity across the team.
* Develop and deliver bespoke specialist training to all groups of staff for multiple organisations following consultation with board level members and heads of service
* Develop and deliver bespoke specialist training to budget holders for multiple organisations following consultation with board level members and heads of service
* Take responsibility for their own personal development, capability and CPD within the PDR process and undertake PDRs for Band 6 Local Counter Fraud Specialists
* Be responsible for the identification of staff development opportunities for Local Counter Fraud Specialists
* Coach, mentor and provide supervision to junior/less experienced staff on all aspects of Counter Fraud work to develop staff skills and knowledge to deliver bespoke pieces of work
* Supervise specialist work resulting in recommendations for service improvement and financial sustainability. This may mean supervising and delegating to other members of the ASW Assurance Counter Fraud Team and Internal Auditors
* Able to be responsible for the day to day supervision of lower band Local Counter Fraud Specialists
* Negotiate with senior managers to ensure staff conduct and financial sustainability are conducive to a fraud resilient service
* Provide advice and support for managers in the area of criminal investigation and, where legal to do so, liaise with HR colleagues in respect of disciplinary processes including current client policy guidance and to ensure that counter fraud investigations observe parallel sanction routes appropriately. This will involve liaison and management with the client, NHSCFA, Crown Prosecution Service and relevant professional bodies

# Information technology and administrative duties

* Design and provide recommendations to current and innovative processes, advising on procedures to enhance fraud resilience and enable sound financial and employment decisions to be made
* Responsible for designing/adapting systems to meet the specifications of others
* Create, record, retain and disclose confidential and non-confidential information across all aspects required by the role
* Ensure timely and accurate information analysis and reporting to Board members and management on agreed areas of work, which will withstand close scrutiny at Board level meetings, client disciplinary hearings, professional hearings and criminal trial processes
* Oversee progress toward implementation of recommendations arising from Counter Fraud work
* Develop and oversee implementation of recommendations to mitigate identified system weaknesses
* Make full and appropriate use of the NHS Counter Fraud Authority case management system observing all the requirements of handling highly sensitive data and documents
* Take and transcribe minutes of formal Counter Fraud Team meetings

# Responsibility for research and development

* Develop, coordinate and implement surveys across multiple organisations to assist with local initiatives and provide valuable data to influence work at a local and national level
* Contribute to the development of key performance indicators for the successful assessment of individual and work stream success
* Delegate aspects of Research and Development activities, collating and interpreting information, analysing and reporting findings



# PERSON SPECIFICATION



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| **Attributes**  | **Essential**  | **Desirable**  |
| **Qualifications and training**  | * Educated to Masters level in relevant subject (or working towards this) **or** equivalent level qualification **or** significant experience of working at a similar level in specialist area
* Accredited Local Counter Fraud Specialist
* Extensive knowledge of specialist areas, acquired through post-graduate diploma or equivalent experience or training
* Strong evidence of continued professional development

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| **Knowledge and experience**  | * Must have an understanding of the background to and aims of current healthcare policy and appreciate the implication of this on engagement
* Must have significant experience of criminal investigation with a current and expert knowledge of police and criminal investigation procedures and legislation, in order to fulfil the role of “Officer in Charge” of investigations with the freedom to act and make all decisions about how investigations are progressed
* Must be able to understand systems and processes across multiple departments within multiple organisations and, using that knowledge, develop
 | * Demonstrated experience of coordinating projects in complex and challenging environments
* Experience in using data analysis software and able to evidence its effective use
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| **Attributes**  | **Essential**  | **Desirable**  |
|  | programs of proactive work to increase fraud resilience at those organisations • Experience of successfully operating in a politically sensitive environment   |  |
| **Specific Skills**  | * Ability to prepare and produce concise yet insightful communications for dissemination to senior stakeholders and a broad range of stakeholders as required
* Well developed interpersonal skills with excellent verbal and written comms skills
* Well developed negotiation skills and able to influence others across a wide range of seniority
* Act with discretion and highly aware of and able to maintain confidentiality across all aspects of counter fraud work
* Able to use highly developed presentation skills to creating and giving presentations to a varied group of internal and external stakeholders, up to Board level
* Able to produce clear and factual written reports covering detailed and complex subject matters for senior stakeholders and influential groups
* Ability to apply highly developed analytical and evaluation skills to very complex issues where material is conflicting and drawn from multiple sources
* Demonstrated capability to act upon incomplete information, using experience to make inferences and decision making
* Numerate and able to understand complex financial issues combined with deep analytical skills
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| **Attributes**  | **Essential**  | **Desirable**  |
|  | * Experience of setting up and implementing internal processes and procedures
* Knowledge of Financial Systems e.g. monitoring budget management, processing invoices and procurement
* Demonstrates well developed organisational skills and capability to plan over short, medium and longterm timeframes and adjust plans and resource requirements accordingly
* Excellent IT skills and in-depth knowledge of

Microsoft Office programs with intermediate keyboard skills * Able to mentor, coach, supervise and guide less experienced members of the team across all aspects of the Local Counter Fraud Specialist role

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| **Requirements due to work** **environment/conditions**  | * Demonstrates capability to manage own workload and make informed decisions in the absence of required information, working to tight and often changing timescales
* Needs to have a thorough understanding of and commitment to equality of opportunity and good working relationships in terms of day-to-day working practices, which support and promote this agenda
* Awareness of information governance procedures
* Ability to travel independently within the ASW

Assurance client area and further afield sometimes at short notice * Whilst the role is largely of an office nature, there are occasions when the job holder will need to work in potentially hostile environments (for example police station custody centres)
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| **Attributes**  | **Essential**  | **Desirable**  |
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| **Physical skills**  | * Used to working in a wide range of working environments, both in busy settings and able to work for periods of time in isolation
* Proficient IT keyboard skills

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| **Physical effort**  | • Use of a vehicle for business purposes and holder of a valid full UK driving licence with physical ability to lift and carry documents and equipment necessary for the job   |
| **Emotional effort**  | * Adaptable, flexible and ability to cope with uncertainty and change
* Professional calm and efficient manner including, but not limited to highly confrontational and contentious situations
* Able to deal with situations where outcomes may have serious consequences for those involved, for example being a defendant in court, loss of employment and loss of career
* Highly motivated and able to work independently as well as part of a team
* Managing several complex projects concurrently
* Able to cope and deal with challenges from senior professionals, for example, barristers and solicitors in court room and interview settings

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| **Mental effort**  | * Ability to select appropriate sources of information and data and liaise with information/data holders to secure the same
* Use to qualitative and quantitative data with a view to progressing investigations, proactive exercise, fraud detection and system weaknesses
* Ability to prioritise a wide set of competing demands form multiple organisations
* Willing to work flexibly, including outside normal working hours
* Able to maintain concentration on complex issues for substantial periods of time whilst also coping with interruptions

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|  | **FREQUENCY****(Rare/ Occasional/ Moderate/ Frequent)** |
| **WORKING CONDITIONS/HAZARDS** | **R** | **O** | **M** | **F** |
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| **Hazards/ Risks requiring Immunisation Screening** |  |  |  |  |
| Laboratory specimens |  | X |  |  |  |
| Contact with patients |  | X |  |  |  |
| Exposure Prone Procedures |  | X |  |  |  |
| Blood/body fluids |  | X |  |  |  |
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| **Hazard/Risks requiring Respiratory Health Surveillance** |  |  |  |  |  |
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| Solvents (e.g. toluene, xylene, white spirit, acetone, formaldehyde and ethyl acetate) |  | X |  |  |  |
| Respiratory sensitisers (e.g isocyanates) |  | X |  |  |  |
| Chlorine based cleaning solutions (e.g. Chlorclean, Actichlor, Tristel) |  | X |  |  |  |
| Animals |  | X |  |  |  |
| Cytotoxic drugs |  | X |  |  |  |
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| **Risks requiring Other Health Surveillance** |  |  |  |  |
| Radiation (>6mSv) |  | X |  |  |  |
| Laser (Class 3R, 3B, 4) |  | X |  |  |  |
| Dusty environment (>4mg/m3) |  | X |  |  |  |
| Noise (over 80dBA) |  | X |  |  |  |
| Hand held vibration tools (=>2.5 m/s2) |  | X |  |  |  |
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| **Other General Hazards/ Risks** |  |  |  |  |
| VDU use ( > 1 hour daily) |  |  |  |  | X |
| Heavy manual handling (>10kg) |  | X |  |  |  |
| Driving |  |  | X |  |  |
| Food handling |  | X |  |  |  |
| Night working |  | X |  |  |  |
| Electrical work |  | X |  |  |  |
| Physical Effort  |  | X |  |  |  |
| Mental Effort  |  |  |  |  | X |
| Emotional Effort  |  |  |  |  | X |
| Working in isolation |  |  |  | X |  |
| Challenging behaviour |  |  | X |  |  |