

Tackling crime against the NHS

A strategic approach

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Tackling fraud and managing security

Foreword

The Coalition Government has delivered a new vision for the NHS, which sets out its plans for a better health service for patients and professionals. The intention is to put patients and the public at the heart of the NHS, improve healthcare outcomes, increase local autonomy, accountability and democracy, cut bureaucracy and improve efficiency.

Crime against the NHS seriously undermines its effectiveness and ability to deliver healthcare. NHS Protect is launching this strategy to tackle this crime and meet the current and emerging challenges facing the NHS.

NHS Protect will support the NHS in meeting its commitments as laid down in the NHS Constitution. In particular, it will strive to ensure that care can be delivered and received in a safe and secure place and that precious and finite resources, provided by the taxpayer, are used effectively in delivering good quality healthcare.

NHS Protect will co-ordinate work to prevent crime in the NHS effectively and efficiently. This will include managing information and intelligence in all parts of the NHS and sharing it with relevant bodies so that, wherever possible, crime is prevented.

NHS Protect will introduce measures to ensure that there is greater local accountability in preventing crime and that the benefit of localised investment is maximised in order to tackle crime. It will provide support, guidance and direction, and manage improved criminal intelligence and information flows across the health service. It will evaluate the effectiveness of its own and local prevention activity, building an evidence base for future activity. This will drive up standards and lead to enhanced performance and effectiveness across the NHS.

Greater local accountability will enable NHS Protect to co-ordinate and manage work to tackle crime against the NHS nationally, and to deal with complex crime through the National Investigation Service. The basis for this local accountability will be in legislation and commissioning contracts, which will set out the responsibilities of commissioners and providers respectively.

I would like you to join us in wholeheartedly supporting NHS Protect's strategy and its important initiatives, to ensure that the NHS can continue to deliver the best possible healthcare experience.

Dermid McCausland
Managing Director, NHS Protect

Introduction

Looking forward

1. We need to put a stop to crime against the NHS. Crime diverts resources from their proper use, patient care, and has far-reaching effects on the ability of the NHS to meet the needs of the public. There are many types of crime that could affect the NHS, and in response to these NHS Protect has responsibility for this, including the following areas:
 - violence
 - counter terrorism security preparedness
 - criminal damage
 - theft
 - bribery
 - corruption
 - fraud
 - unlawful action (market fixing etc).
2. In order for it to be most effective, work to tackle crime needs to be nationally led and co-ordinated. This is the mission of NHS Protect, and this strategy outlines how we will achieve this, and thereby reduce crime against the NHS.
3. The coalition government has introduced a new blueprint for the NHS, including new arrangements for the commissioning of health services. NHS Protect will work with the Department of Health and the new bodies within the emerging structure, to build appropriate anti-crime measures into the reformed NHS. It will provide expert guidance, support and liaison with partner organisations to ensure that the NHS has the most up to date information to allow it to respond appropriately through contractual arrangements, monitoring mechanisms and where appropriate regulatory activity to provide the proper anti-crime arrangements in the new commissioning and provider bodies.
4. Commissioners and providers should demonstrate their commitment to local accountability and safeguarding NHS resources by making the proper investment in anti-crime measures. This will include, where appropriate, having fully trained and qualified professional resources to deliver this strategy at the local level.

5. As part of its overarching responsibility for tackling crime affecting the health service, NHS Protect will provide strategic and tactical guidance to health bodies and will work closely within the NHS framework.
6. This requires that NHS Protect continues to develop as a centre of excellence for anti-crime work. Being a centre of excellence, we will support and protect frontline services by performing essential tasks that cannot be undertaken by other bodies either in isolation or regionally. NHS Protect will focus particular investigative attention on cases which are complex or of national significance in accordance with the published NHS Protect case acceptance criteria, while making the most efficient use of resources and ensuring the best possible return on investment.

Working with the NHS

7. NHS Protect leads on work to safeguard NHS staff, patients and resources. It will meet the challenges facing the NHS, with the emergence and development of the new NHS delivery framework. We aim to provide increased levels of support, guidance and advice by improving the management of information and the delivery of anti-crime intelligence.
8. Crime can be prevented by targeting and co-ordinating work effectively, building in anti-crime measures at all stages of national and local policy development, and reflecting wider government initiatives where appropriate. To enable compliance with the NHS Standard Contract, we will provide a Crime Risk Assessment Toolkit, we will set standards for tackling crime across NHS funded services and we will use an evaluation model to assess the effectiveness of prevention activity and improve future proactive work.
9. This document outlines the overarching strategy for tackling crime within and against the NHS. More detail on priority areas for action will be outlined in the relevant operational business plans.

The NHS anti-crime strategy

NHS Protect aims

10. Given the backdrop of reform in the NHS, we need to continuously improve anti-crime provision to safeguard the NHS for the future. In order to ensure this continuous improvement, NHS Protect has five strategic aims:
 - To provide **national leadership** for all NHS anti-crime work by applying an approach that is strategic, co-ordinated, intelligence-led and evidence based.
 - To **work in partnership** with the Department of Health, commissioners and providers, as well as our key stakeholders, such as the police, the CPS, local authorities and professional organisations such as the National Fraud Authority and the Cabinet Office Counter Fraud Task Force, to coordinate the delivery of our work and to take action against those who commit offences against the NHS.
 - To **establish a safe and secure environment** that has systems and policies in place to: protect NHS staff from violence, harassment and abuse; safeguard NHS property and assets from theft, misappropriation or criminal damage; and protect resources from fraud, bribery and corruption.
 - To lead, within a clear professional and ethical framework, **investigations** into serious, organised and/or complex financial irregularities and losses which give rise to suspicions of fraud, bribery or corruption.
 - To **quality assure** the delivery of anti-crime work with stakeholders to ensure the highest standard is consistently applied.
11. These aims will be met by working in accordance with the following three key principles, which underpin all anti-crime work in the NHS.

Three key principles for action

12. In order to reduce crime, it is necessary to take a multi-faceted approach that is both proactive and reactive. We advocate the adoption of three key principles designed to minimise the incidence of crime, and to deal effectively with those who commit crimes against the NHS. These principles apply across the sector, at national and local and at strategic and operational levels. The three key principles are:

- **Inform and Involve** those who work for or use the NHS about crime and how to tackle it. NHS staff and the public should be informed and involved with a view to increasing understanding of the impact of crime against the NHS. This can take place through communications and promotion such as public awareness campaigns and media management. Working relationships with stakeholders will be strengthened and maintained through active engagement. Where necessary, we will all work to change the culture and perceptions of crime so that it is not tolerated at any level. NHS Protect provides the tools to those who tackle crime so that they are equipped to deliver this strategy at the local level. We will also provide local specialists with the information and intelligence they need in order to be able to detect and investigate crime.
- **Prevent and Deter** crime in the NHS to take away the opportunity for crime to occur or to re-occur and discourage those individuals who may be tempted to commit crime. Successes will be publicised so that the risk and consequences of detection are clear to potential offenders. Those individuals who are not deterred should be prevented from committing crime by robust systems, which will be put in place in line with policy, standards and guidance developed by NHS Protect.
- **Hold to account** those who have committed crime against the NHS. NHS Protect will professionally train specialists who tackle crime and ensure they continue to meet the required standard. Crimes must be detected and investigated, suspects prosecuted where appropriate, and redress sought where possible. Where necessary and appropriate, this work should be conducted in partnership with the police and other crime prevention agencies. In relation to economic crime, investigation and prosecution should take place locally wherever possible. NHS Protect will deal with cases which are complex or of national significance through the National Investigation Service. Where recovery of monies lost to crime is viable, this should be pursued. In relation to crimes against NHS staff, criminal damage or theft against NHS property, investigation and prosecution should be

undertaken in liaison with the police and CPS or where necessary NHS Protect. NHS funded organisations will need to meet the relevant standards when tackling crime, and will be responsible for ensuring that they do so, supported by NHS Protect's quality assurance process.

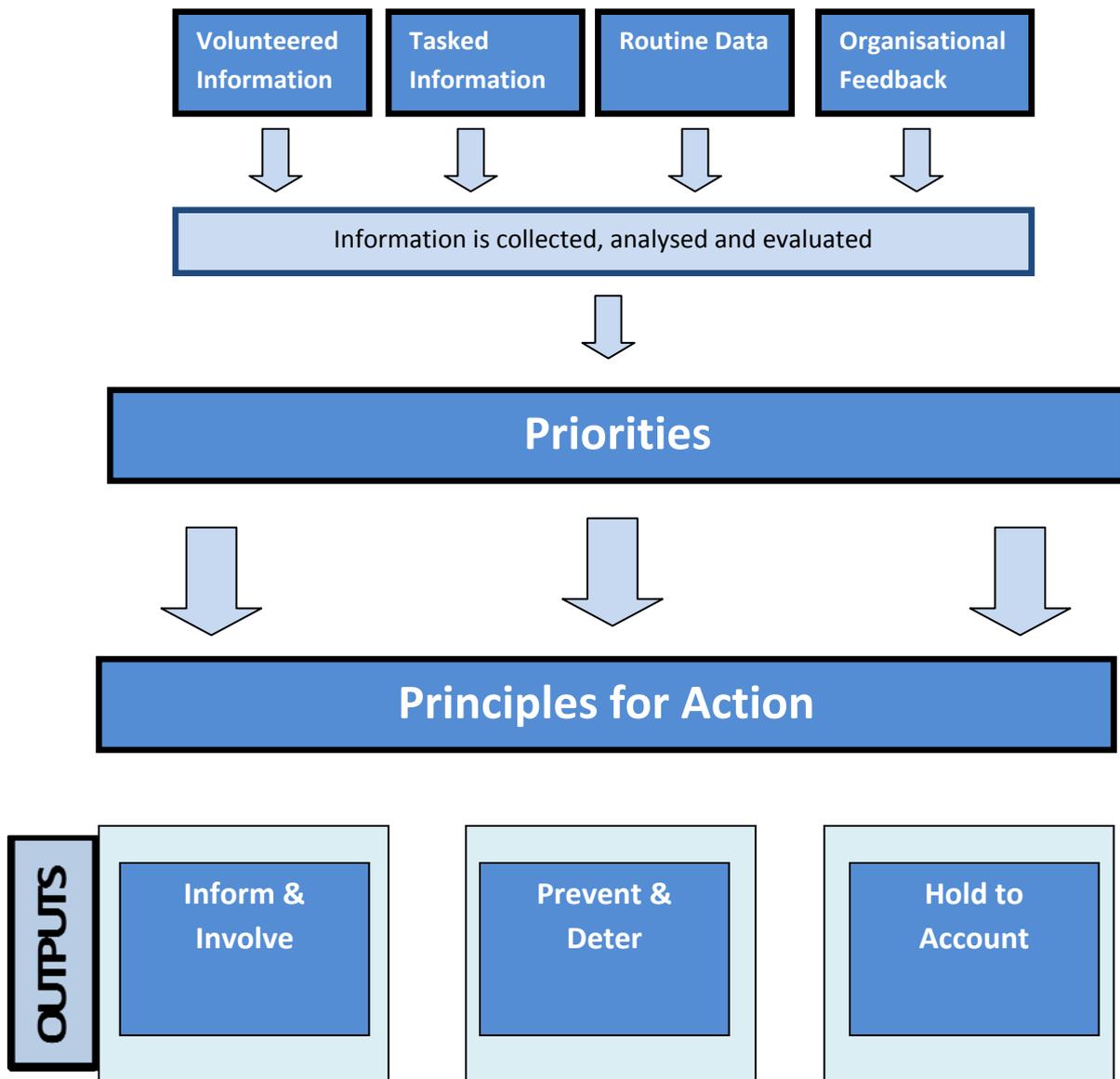
Standards

13. The three key principles for action, which could apply to any sector, provide a foundation for the work that needs to be undertaken to tackle crime. In order to deal with the specific needs of the health sector, NHS Protect has developed standards, which provide a more detailed framework of requirements that apply to organisations involved in the delivery of NHS care. These standards, which are available on our website at <http://www.nhsbsa.nhs.uk/Protect.aspx>, give more detail on what is expected at a local level when implementing this strategy and working in accordance with the key principles of action.
14. NHS Protect will continue to quality assure anti-crime work across the NHS by monitoring compliance against these standards and assessing the quality of the anti-crime work carried out across the sector. In order to increase transparency in the quality assessment process, the standards set out the requirements and indicate levels of performance. They also enable local specialists to identify where improvements need to be made and take action accordingly.

Business process

15. The Business Process is explained further in the NHS Protect Business Plan. This brings together the collection of information and intelligence from a number of potential sources, enabling a strategic assessment to inform organisational priorities and resulting actions to deliver the necessary outputs.

Process Chart



Review of strategy

16. The NHS is currently undergoing a reform programme and this will present new challenges to anti-crime work. The strategy for NHS Protect is designed so that the proper local arrangements can be put in place now to ensure that the process for protecting the NHS from crime can be developed along with the organisational structure. Commissioners, providers and the regulatory framework are changing, and will continue to evolve in the coming years. The strategy for tackling crime needs to keep pace with this change and will be reviewed and adapted accordingly.
17. Monitoring performance is an important part of NHS Protect's approach to ensure that the organisation is fulfilling its strategy commitments and is performing to the very highest standard. While the NHS is reforming, our ability to define a standard against a constant set of targets is limited.
18. NHS Protect will encourage the introduction of proper anti-crime measures over the next two years as an important immediate safeguard both now and as the reforms run their course. It will support the continuation of anti-crime provisions in relevant legislation and contractual requirements. This includes the requirement for continuation in the provision of specialists as existing organisations merge and new ones come into being. We will continue to contribute to the reform process and promote our anti-crime message.