NHS Protect
Business Plan
2016-17

April 2016
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive summary</td>
<td>3</td>
</tr>
<tr>
<td>About us</td>
<td>7</td>
</tr>
<tr>
<td>Context</td>
<td>13</td>
</tr>
<tr>
<td>Organisational priorities</td>
<td>19</td>
</tr>
<tr>
<td>Finance</td>
<td>24</td>
</tr>
</tbody>
</table>
Executive summary
NHS Protect is the body within the NHS that delivers a service focussed on the protection of NHS resources from crime.

We deliver services to the NHS that allow it to review, manage and reduce risks from crime, enabling valuable resources to be directed to, not diverted from, patient care.

NHS Protect provides a number of services that are unique. NHS Protect is the only organisation with the resources and the capabilities needed to provide these services.

Mission, vision and purpose

NHS Protect has a clear strategic framework encapsulated in our mission, vision and purpose:

**Our mission**

To lead the fight against crime affecting the NHS and the wider health group, protecting vital resources intended for patient care.

**Our vision**

Our vision is for an NHS which can protect its valuable resources from crime.

**Our purpose**

We will lead the NHS in protecting its resources by using intelligence to investigate serious and complex economic crime, reduce the impact of crime and drive improvements.

Strategic goals

NHS Protect will realise these aims by pursuing the following strategic goals:

- We will develop and use our intelligence function to improve understanding
of crime risks across the NHS and the wider health group and provide high quality analysis of those risks.

- We will develop and deliver evidence-based strategic, tactical and operational crime reduction solutions for the NHS and enable the prioritisation and removal of both existing and potential crime risks.

- We will develop our people and our services, identifying and developing new technology and systems that support continuous organisational improvement and reductions to operating cost.

- We will provide anti-crime standards, benchmarking data and robust assessment mechanisms that will be used to measure and drive improvement in work done to identify and tackle crime across the NHS.

- Where serious, complex, or high-value fraud or corruption is identified and money lost to the NHS, we will investigate fully those allegations, seek to recover losses and pursue all possible and appropriate sanctions against offenders.

Our values

In achieving our aims NHS Protect will always work in a way that demonstrates the highest regard to our key values:

- Fairness
- Expertise
- Propriety
- Objectivity
- Professionalism
- Vision
Organisational priorities

In view of the outcome of the review of NHS Protect, in 2016-17 we will focus on developing the services we are tasked with providing. Our organisational priorities will therefore be as follows:

- Development of transitional arrangements for service delivery
- Development of intelligence services for the NHS and the wider health group
- Development of NHS Protect’s improvement services
- Developments of NHS Protect’s compliance process
- Roll out and implementation of guidance for the NHS on the Community Safety Accreditation Scheme
About us
NHS Protect delivers a service focused on the protection of NHS resources from crime. The aim of our anti-crime work is to protect health and care staff and resources from activities that would otherwise undermine their effectiveness and their ability to meet the needs of patients and professionals. Ultimately this helps to ensure the proper use of valuable resources and a safer, more secure environment in which to deliver and receive care.

NHS Protect is part of the NHS Business Services Authority (NHSBSA) and works to a memorandum of understanding with the NHSBSA and the Department of Health (DH).

NHS Protect leads on work to protect NHS staff, patients and financial resources through intelligence led activities that enable effective prevention, disruption and enforcement action against all criminals targeting the NHS. We also promote awareness of the risks that these criminals pose to NHS staff and the services they deliver. Our approach fully supports the aims and objectives of the Department of Health Anti-Fraud Unit and its partners, in a collaborative approach to fighting crime affecting the NHS. The DH AFU have determined that action to combat economic crime requires a cycle of intelligence assessment, prioritisation, collaboration, co-ordinated action and evaluation (illustrated below). Their approach to anti-fraud work will aim to provide clarity on the nature and scale of problems and progress in dealing with them.
NHS Protect’s strategy and plans mirror this approach.

We deliver services that support the NHS in reviewing, managing and reducing the crime risks it faces, enabling valuable resources to be directed to, not diverted from, patient care.

There are many types of crime that could affect the NHS, including the following:

- violence against NHS staff and patients
- criminal damage and theft of NHS property, assets and resources
- economic crime (fraud, bribery or corruption)

NHS Protect seeks to prevent crime within the NHS 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.
There are three principles of co-ordinated action to combat crime in the NHS:

- It is necessary to **inform and involve** those who work for or use the NHS on the risks of crime and how to tackle it. Where necessary we will work to continue to change the culture and perceptions of crime so that it is not tolerated at any level.

- Wherever possible, crime should be **prevented and deterred**. We will work to design out vulnerabilities from new systems, processes and working practices focusing on prevention by maximising the use of data analytics and checks against relevant data sets.

- There will always be a minority of dishonest people who attempt to evade our preventative efforts. Those who have committed crime against the NHS should be **held to account**. They will be detected, investigated, prosecuted where appropriate, and redress sought where possible.

NHS Protect sets standards for tackling crime across NHS commissioner and provider organisations, and uses an evaluation model to assess the effectiveness of crime prevention work within these organisations and improve the way in which they detect criminals and take action against them.
As an intelligence led organisation, NHS Protect has adopted a business model to:

- ensure that decisions about priorities and competing demands are made on the best available assessments of threats
- provide a sound basis for, and record of, decision making
- deliver the investment of resources in areas where they are most likely to be effective

Since November 2014 NHS Protect has been subject to a review of its functions and services. Following the outcome of this review (please see the next section for more details), the organisation’s priorities for 2016-17 will focus on the need to establish an agreed remit and strategic direction. They will therefore reflect the planning and development of key areas of activity rather than a focus on specific crime risks. Work to address priority crime risks will continue but it will be considered business as usual rather than identified as organisational priorities.

Our organisational priorities in 2016-17 will be:

- To develop and deliver a plan (operational and communications) for the withdrawal of some support functions currently provided by Local Support and Development Services (LSDS).
- Identify which services currently provided by LSDS need to be retained and model these into the operating structure for 2017-18.
- To develop and deliver a plan (operational and communications) for the withdrawal of functions currently provided by Training.
- Identify which services currently provided by Training need to be retained and model these into the operating structure for 2017-18.
• Using current guidance and knowledge, provide a briefing paper to DH on the key fraud issues, likely objectives for NHS Protect’s work plan and how NHS Protect units can work together.

• Provide ongoing anti-fraud advice and guidance which feeds into the national initiative to reduce NHS staff agency costs.
Context
This business plan is written in the context of the requirements of the government’s comprehensive spending review and the outcome of the Department of Health Anti-Fraud Unit’s review of NHS Protect’s functions. The review concluded that the primary responsibility for all local anti-crime work (both economic and non-economic) should remain with the boards of local NHS organisations.

There remains a need for a single expert intelligence-led organisation - NHS Protect - to provide centralised investigation capacity for complex crime matters and to have oversight of and monitor anti-crime work across the NHS. This will include the definition of anti-crime standards and assessment of performance through the provision of comparative data together with a drive to improve the anti-crime work that is undertaken.

It was identified that the support work undertaken currently by NHS Protect, such as anti-crime specialist training and local support services, had been successful. The review concluded that NHS Protect should no longer provide these services as boards of local NHS organisations should now have the knowledge and capacity required to deal with the crime threats they face. If these services continued, there is a risk that NHS boards would not properly take ownership of local anti-crime risks.

As a result NHS Protect’s service delivery model will now change from direct operational support to standard setting, benchmarking and assurance which will enable local corrective action.

In 2016-17 NHS Protect will undergo a transition, and it is anticipated that it will move to an operating model that no longer includes the direct provision of support services, so it can deliver its agreed new remit and strategic direction. Until this time NHS Protect will continue to provide the full range of support functions that it provides at present. When more information becomes available, this will be shared with all users of our services.
Intelligence and Research

Through a cycle of intelligence development, NHS Protect’s Intelligence and Research Unit will provide a consolidated understanding of the economic and security crime threats facing the NHS and wider health group. This will be achieved through the collection, collation and analysis of information that holds intelligence value. The unit’s processes will enable the development of the best available understanding of current threats and emerging trends at operational, tactical and strategic levels. They will also allow for the identification of threats that may not be apparent when considered locally or in isolation. The approach of the Intelligence and Research Unit will help it to ensure that the experiences of any one organisation are appropriately shared at the earliest opportunity to enable the wider prevention and detection of crime.

Investigations

Within the range of economic crime activity targeted against the NHS, there are investigations and enquiries which are complex in nature, involve organised criminal activity or are considered to be of national significance. For such cases, NHS Protect has a National Investigation Service, a specialised NHS focused unit with specific statutory responsibilities and unique powers to investigate cases that other investigatory bodies have neither the remit, expertise nor specialist resources to take forward. In addition to this, the Forensic Computing Unit is a specialised NHS focused investigation service which provides highly specialised forensic computing and eDiscovery services specifically for the NHS.

Strategy, Guidance and Crime Prevention

To provide the NHS with the tools to be able to prevent crime, NHS Protect’s Strategy, Guidance and Crime Prevention Unit develops innovative, effective,
Context

NHS Protect Business Plan 2016-17

flexible and evidence-based solutions to protect NHS resources by preventing crime. The unit provides the national overview of relevant NHS and government policy and procedures and takes the lead on anticipating and interpreting developments and assessing their impact on the NHS. They develop strategic guidance and toolkits for the NHS, specifically to tackle the crime risks it faces. The unit finds new solutions to emerging crime problems, and is uniquely placed to adopt a tactical approach through access to NHS specific information in order to evaluate those problems and develop practical crime prevention and crime reduction solutions. The unit is also able to adapt the anti-crime strategy in line with national health and criminal justice policy.

Information Security and Systems

NHS Protect provides the NHS with a number of digital tools designed to aid the fight against crime. The Information Security and Systems (ISS) team manages the ongoing development of bespoke applications, including fraud case management, security incident reporting, fraud reporting and compliance reporting systems used across the NHS. The team is also responsible for information security within NHS Protect and the maintenance of ISO certifications. During 2016-17 ISS will act in support of the organisation as it transitions to the new service model, amending existing systems and identifying areas for technological improvement.

Training

Currently NHS Protect delivers a university accredited training programme for anti-crime specialists working at a local level across the NHS, and other generic anti-crime training modules focusing specifically on the NHS. During the 2016-17 financial year NHS Protect will withdraw from the delivery of these direct support courses and will work with the private sector to develop options for NHS staff to continue to obtain these qualifications through other accredited providers.
Local Support and Development Services

LSDS currently provides a nationally coordinated, intelligence led approach to anti-crime work supporting and guiding NHS organisations in tackling crime against the NHS.

Their aim is to lead on and influence a complete and comprehensive approach to anti-crime work across the NHS locally. They are the interface between NHS Protect and organisations providing NHS services including private sector contractors. During 2016-17 there will be a gradual withdrawal of the support, advice and guidance currently provided as NHS Protect transitions to its new operating model.

Quality and Compliance

The Quality and Compliance Unit is a multi-discipline team which evaluates the effectiveness of anti-crime work undertaken by NHS commissioners and providers. By taking an intelligent and evidence-based approach the unit assesses organisations against required standards set by NHS Protect. Using data analytical capability and benchmarking it works with the DH governance panel to hold to account those organisations that fail to meet agreed standards.

Deterrence and Engagement

D&E is responsible for developing and delivering effective communications, support functions and media engagement to highlight the need for all in the NHS to be aware of the vulnerabilities it faces. D&E proactively contributes to and supports central elements of the organisation’s work programmes with the aim of publicising the work of NHS Protect and educating on the effects of crime. During 2016-17 D&E will support the new service model, improving a number of key
Context

internal and external communication channels and developing and implementing technological improvements where possible.

Information Analytics

The Information Analytics team is responsible for collecting, collating, managing, analysing and disseminating information in support of all business units within NHS Protect and externally. The outputs are used for both strategic and tactical purposes to enable operational and management decision making to take place from an informed position. This includes informing national policy, guidance and the development of a proactive approach to the protection of NHS staff, patients and resources.
Organisational priorities
Development of transitional arrangements for service delivery

Aim

To establish an agreed remit, strategic direction and location for NHS Protect together with a target operating structure that supports the anti-crime services required by the Department of Health and the NHS.

Objectives

- To develop and deliver a plan (operational and communications) for the withdrawal of some support functions currently provided by Local Support and Development Services (LSDS).

- Identify which services currently provided by LSDS need to be retained and model these into the operating structure for 2017-18.

- To develop and deliver a plan (operational and communications) for the withdrawal of functions currently provided by Training.

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- Using current guidance and knowledge, provide a briefing paper to DH on the key fraud issues, likely objectives for NHS Protect’s work plan and how NHS Protect units can work together.

- Provide ongoing anti-fraud advice and guidance which feeds into the national initiative to reduce NHS staff agency costs.
Organisational priorities

Development of intelligence services for the NHS and the wider health group

Aim

To enhance and develop NHS Protect’s intelligence services to provide a central hub that meets the intelligence requirements of the NHS and the wider health group.

Objectives

- To deliver an enhanced strategic intelligence assessment of crime risks affecting both NHS expenditure and matters affecting the wider health group. To specifically include DH administered grants and adult social care budgets.

- To increase the quantity of fraud reports and actionable intelligence available to NHS Protect and the wider health group.

- To develop the central anti-fraud intelligence system hub to enhance the capture, evaluation and management of information on behalf of the wider health group.

- To increase the effectiveness of our information analytics capability by increasing our information data sets to include areas identified as having a heightened risk.

Development of NHS Protect’s improvement services

Aim

To devise new ways in which to develop solutions to minimise crime risks in the NHS and to bring about improvements in local approaches to tackling crime.
Objectives

- To research, develop and document a range of options for the delivery of services to improve outcomes in the tackling of crime against the NHS. This will require developing and evaluating options for the delivery of that activity, including detail as to how improvements could be identified/measured and how this would link with NHS Protect’s quality assurance and compliance process.

- Develop an implementation plan for the delivery of improvement functions and services.

Development of NHS Protect’s compliance process

Aim

To develop a dynamic, robust, intelligent, evidence-based quality assurance and compliance framework to support the DH health group’s governance panel in raising the standards and performance of those delivering anti-crime services to the NHS. This will include utilising our data analytical capability to provide comprehensive benchmarking information to support the health group in holding organisations to account for failure to meet agreed standards.

Objectives

- Review existing processes to ensure that they are relevant and fit for purpose.

- Develop a more intelligent, evidence-based assessment programme.

- Develop a wider range of products, designed to measure the NHS response to crime affecting it.
Organisational priorities

- Enhance quality and compliance reports, including individual compliance assessment reports, for providers and commissioners, to support the DH health group’s strategic aims.

- In association with DH, establish a governance process for security management.

- Review information assurance and sharing agreements and develop associated process maps.

- Enhance the on-line information portal for external stakeholders.

Roll out and implementation of guidance for the NHS on the Community Safety Accreditation Scheme

Aim

To roll out effective guidance for the implementation of the Community Safety Accreditation Scheme (CSAS) in providers of NHS services.

Objectives

- To ensure that health bodies are provided with sufficient information and guidance to allow them to implement CSAS arrangements

- To collate information from health bodies engaging with CSAS (e.g. number of staff accredited) and produce tables showing effective and less effective engagement
Finance
The budget for NHS Protect for 2016-17 is £9.872m (in 2015-16 this was £10.4m; the reduction is due to requirements of the government’s comprehensive spending review of 2015).
## Organisational Priority Area –
### Development of transitional arrangements for service delivery

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• To develop the central anti-fraud intelligence system hub to enhance the capture, evaluation and management of information on behalf of the wider health group.  
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  • Develop an implementation plan for the delivery of improvement functions and services. |
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