

**………………………………………………………………………………… (Organisation name)**

###### COUNTER FRAUD

**COMMUNICATIONS STRATEGY**

**……………………………………… …………………………….**

**Counter Fraud Specialist Communications Manager**

**………………………………………**

**Director of Finance**

Revision date

**Counter Fraud – Communications Strategy**

# 1 Introduction

1.1 This document has been established to enable and evidence communication requirements to promote and raise awareness of the ABC Ltd counter fraud initiative, including the publicising of proven ABC fraud cases and media handling.

1.2 The Counter Fraud Specialist (CFS) is committed to ensuring that effective communication is in place to deter fraud and prevent the organisation from falling victim to fraudulent practices which divert much needed resources from patient care. Through publicity, education and training, the organisation seeks to change attitudes to and perceptions of fraud. The message will be that fraud is not a victimless crime and that active co-operation is necessary to prevent valuable resources being diverted through fraudulent activity.

1.3 The CFS will enlist the assistance of staff who already have effective communication methods in place which may be used to publicise, educate and train staff throughout the organisation.

1.4 The types of communication used by the CFS will be reported to both the director of finance and the audit committee, along with how effective this work has been.

1.5 This strategy concentrates on the following communication areas:

* media
* local promotion of fraud awareness.

1.6 The director of finance should be consulted about any conflicts that arise in respect of this communications strategy.

1.7 This communications strategy is open to review and continual improvement, particularly in light of further experience and new developments. Countering fraud will require a comprehensive approach from everyone who works in and around the organisation.

**3 Communicating with the media**

3.1 The communications manager will receive an advance warning from the CFS if there is a possibility of external interest in any potential fraud investigation or fraud awareness event. Appropriate measures may need to be put in place to protect the organisation from adverse publicity and ensure continuity of patient services/care.

3.3 All press releases relating to fraud and corruption will initially be agreed with the communications manager in liaison with the CFS. Such communications allow members of the public to become aware of the organisation’s anti-fraud stance.

3.4 The CFS will promptly brief the communications manager on any other contentious issue in relation to fraud and corruption which is likely to attract interest from the media. Public interest/safety should always be the ultimate consideration when deciding whether to be proactive in these circumstances by releasing information or issuing a reactive statement.

3.5 Despite best efforts, the media may become aware of inappropriate information about an ongoing fraud or corruption investigation. If this situation does occur, it can sometimes result in the media running inaccurate stories about investigations. In such cases, the Director of Finance should be contacted immediately so that, in liaison with the CFS, the best course of action can be determined. The CFS/Board/Communications Team will need to liaise closely to ensure that resulting stories are not misrepresentative or damaging to the investigation or reputation of the organisations and people involved.

3.6 Any media enquiry about fraud or corruption received by the CFS will be directed to the communications manager in the first instance. This will ensure a consistent approach across the organisation.

3.7 Any request to the CFS for a media interview will be directed to the communications manager, ensuring that it is handled promptly and the most appropriate person interviewed.

**4 Local promotion of fraud awareness**

4.1 To promote the role of the CFS and create an anti-fraud culture, the CFS will use various communication methods around the organisation. These will inform, educate and train staff, suppliers and customers about the effect fraud can have on service levels and how to report any knowledge or suspicions of potentially fraudulent activity.

4.2 The communications undertaken by the CFS are designed to cover the following areas:

* **Creating an anti-fraud culture** – this involves changing the attitudes to and perceptions of fraud within the organisation so that there is a willingness, and confidence, to report any knowledge or suspicion of fraud. The need to protect the organisation from fraudulent activity needs to be seen as the joint responsibility of everyone within the organisation.
* **Deterrence** – this is linked to the creation of an anti-fraud culture in that peer group pressure can make potential fraudsters feel that what they are contemplating is unacceptable. The deterrent factor is about the extent to which potential fraudsters believe that if fraud is attempted it will be detected and prevented from succeeding. It also relies on communicating the message that full sanctions (including criminal action) will be considered, without exemption, and appropriate action taken for any perpetrator of fraud.
* **Prevention** – this involves raising awareness of the types of fraud that may occur and communicating this to line managers, budget holders, risk groups, audit committees and auditors of organisations to ensure that systems being operated are not open to fraud occurring unchallenged or undetected.
* **Detection** – this involves enforcing the message for all staff to remain vigilant and open to the possibility of fraud being attempted. The CFS will need to communicate to all staff what action to take if a potential fraud has been detected, as inappropriate, well-intentioned actions may compromise the pursuit of full sanctions if fraud can be evidenced. This type of communication needs to emphasise organisation support for staff who report such concerns so that confidence in the system can be maintained.
* **Sanctions and redress** –to underpin the above messages, the CFS will publicise proven cases of fraud that has occurred both locally and nationally. Communication in this area enhances the message that fraud will not be tolerated and that the organisation will pursue full sanctions whenever appropriate to do so.

4.3 The effectiveness of the communication methods explained in 4.2 will be assessed by using a local annual staff survey issued to a sample of staff across the organisation. The results of this survey will be reported to the director of finance and will inform future work undertaken by the CFS.

4.4 Appendix A details the communication methods and action plans to meet specific target audiences. Any other types of communication available around the organisation should be brought to the attention of the CFS so that they can be added to the appendix.

**5 Contact points**

* 1. Any concerns about work related to fraud and corruption should be communicated to the CFS, who can be contacted on ………………………… or email …………………………….
  2. The Communications/Media team can be contacted on **0000 999999**.
  3. Further information can be found on the organisation’s intranet site, in its whistleblowing policy or fraud policy.

**EXAMPLE OF COMPLETED TABLE OF**

**KNOWN INTERNAL COMMUNICATION OPPORTUNITIES**

*(CFS to amend as necessary so it is applicable to organisation concerned)*

| **Target Audience** | **Method** | **Timescale** | **Details/Action** | **Frequency of CFS usage** | **Responsibility** |
| --- | --- | --- | --- | --- | --- |
| Staff | Promote the role of the CFS | Ongoing | Article in Team Brief and official newsletter to promote CFS role and disseminate fraud awareness information | 1 article per year per newsletter | CFS &  communications manager |
| Managers  Staff | Fraud alerts to specific department(s)  Fraud alerts to staff | As required | Email alert information to relevant departments  Global beware email to staff | Ongoing  As appropriate | CFS |
| Staff | Specialist / departmental  briefings | Ongoing | Customised presentations to raise fraud awareness  Article in departmental /specialist newsletters | --- *(number)* presentations per year  1 article per year | CFS &  dept managers  CFS |
| Staff | Identifying the risk of fraud in departments / areas | Ongoing | Utilise risk newsletter to publicise risk areas  Presentation to the risk group  Update risk group with proven fraud cases | 1 article per year  1 per year  4 per year | CFS &  risk manager |
| Staff | Information contained in induction information  packs | Ongoing | Fraud information contained in induction packs to be kept up-to-date and with a smart presentable image | Update information 4 times a year | CFS &  training co-ordinator |
| Staff | Publicise local and national cases | Ongoing | Publicise proven fraud cases through the CFS newsletter  Include proven case information on local intranet  Include up-to-date proven fraud cases on presentation handouts | 3 per year  Ongoing  Ongoing | CFS  System administrator  CFS |
| Staff | Counter fraud intranet site giving fraud awareness information | Ongoing | Local intranet web page to provide staff with details on counter fraud within the organisation  Constantly place good news stories with official organisation newsletter | Update information 3 times per year  2 articles per year | CFS &  system administrator  Communications manager |
| Staff / customers/ suppliers | Fraud information | Ongoing | Fraud Awareness Event / road shows around the organisation  Payslip message | 1 per year  1 message every 10 months | CFS  HR/Payroll |
| Staff / customers/ suppliers | Posters to give a positive image to staff and provide contact numbers to report suspected fraud in the workplace | Ongoing | Counter fraud posters in departments / public areas, reception area | 1 walk around per year to replenish stocks | CFS  dept managers  reception manager |
| Customers | Complaints systems local procedures/handbook | Ongoing | Refer to methods of fraud reporting | Review contact details annually | Complaints manager |
| Audit Committee | Regular in-year progress reports of counter fraud work and investigation updates  Annual report of counter fraud work | Every 3 months  Every year | Attendance at meetings as required  Written report presented to committee | 3 reports per year  1 report per year | CFS |