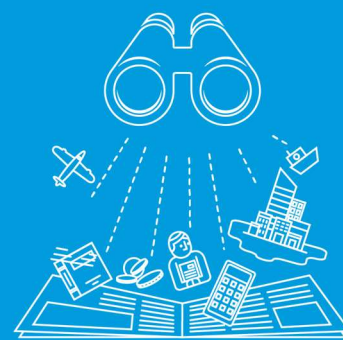


Pre-employment checks spotlight



The first line of defence against the different forms of recruitment fraud is strong pre-employment checks and controls. These help to prevent applicants from securing employment based upon false or misleading information. The controls also stop dishonest individuals from entering the NHS and having access to our patients, colleagues and systems where they could commit further fraud.

NHS Employment Check Standards

The NHS Employment Check Standards provide examples of best practice in relation to pre-employment checks. The six standards also act as a useful guide to the type of risks that can apply to the recruitment process and as a framework for preventing and detecting fraud in this area.

Fraud in the recruitment process

Details of the various ways that recruitment fraud is committed are provided below:

- the use of false identities, either using fake details, or impersonating another person
- attempting to work within the NHS when they have no current legal right to work in the UK. *Failure to conduct right to work checks could result in NHS employers being issued with a civil penalty of £20,000 per illegal worker, or up to five years imprisonment and / or an unlimited fine where they have found to have knowingly employed an illegal worker.*
- attempting to work within the NHS without the required professional registration or essential qualifications for the position;
- providing false or misleading employment history, or providing unsuitable or false employment referees and references to support this;
- attempting to hide or disguise a criminal record in order to gain employment. They may also use false identity details so that the criminal record does not appear on any checks.

In each method, the individual could provide false or misleading information on their job application form or at their interview, and may also present stolen, forged/counterfeit or dishonestly obtained documents. It must also be remembered that the individual may withhold or disguise other false information, such as no right to work in the UK, a criminal record or a lack of skills, knowledge or experience for the position.

Covid-19 Relaxed controls

One of the most crucial pre-employment checks is confirming the applicant's identity but social distancing means that we are unable to meet all applicants face to face to conduct checks. Refer to the [NHS employers guidance](#); on how these checks should be managed during Covid;

How to conduct the verification of identity check?

Ask the applicant to provide a scanned copy or photo of their original identity documents via email or by using a mobile app. This should include one of the following combinations:

Combination 1:

- two forms of photographic personal identification
- one form of identity showing the applicants' current residing address

Combination 2:

- one form of photographic personal identification
- two forms of identity showing the applicants' current residing address

Combination 3:

- A current passport-compliant photograph of themselves. NB: employers can temporarily accept expired passports, as long as they are within six months of their expiration date, as proof of identity
- two forms of identity confirming their current residing address
- two forms of non-photographic identity

Forged DBS certificate presented.

A client of ours identified a forged DBS certificate submitted electronically by an applicant. The individual had applied for a position at the Trust as a Band 3 HCA. Due to the nature of the role, applicants are required to undertake a DBS check. No convictions had been declared on their application form.

The applicant was required to present their certificate. Staff noticed the certificate provided had different coloured fonts on the top and bottom halves, mis aligned boxes and the pages appeared mis-aligned. It was identified that two separate certificates have been placed together to appear to be one and the same.

Enquiries by the Trust identified the applicant had previously been convicted of defrauding the NHS of £43,000. His job offer was rescinded, and an investigation is underway

Covid 19 identified Recruitment Risks.

Socially distanced recruitment, and an urgent need to on-board staff, brings new risks. We have provided some mitigating steps to help reduce these increased risks

Risk Area	Contributing Factors	Mitigation
Recruitment An increase in staffing demand due to self-isolation and increasing pressures, will prevent the application of some existing pre-employment screening processes	<ul style="list-style-type: none">• New applicants without the appropriate qualifications or right to work status, or with criminal records, will seek to exploit the opportunity to commence employment whilst screening is pending• Staff in training and former staff not currently regulated will be able to join or return to the workforce• Agency staff may commence engagements whilst screening is pending	<ul style="list-style-type: none">• Pre-employment screening should be pursued to the greatest extent in the time frame available, with checks continuing to progress to completion, even post recruitment• Document scanners should be utilised wherever possible• Accurate records should be taken and recorded throughout the recruitment process• Framework agencies should be utilised wherever possible, with suspected non-compliance escalated• Agency staff identity must be confirmed at their first shift
Temporary workforce Agency staff usage will be increased due to self-isolation and increasing pressures		

Recruitment fraud workshops and reporting to LCFS

Regular training is essential for recruitment staff to ensure you are aware of the fraud risks and have the skills to identify forged and counterfeit documents. Recruitment fraud workshops are delivered by the LCFS and are designed for all those involved in the recruitment of staff. The objectives of the workshop are to:

- explain why recruitment fraud is an issue within the NHS;
- highlight the relevant legislation and guidance available;
- provide recent case examples of recruitment fraud;
- show you how to emphasise what can be done to prevent and detect recruitment fraud; and
- explain when and how suspicions of recruitment fraud should be reported.

If you wish to arrange a workshop or require any further information regarding fraud or bribery within the NHS, please contact your LCFS.

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