

OFFICIAL



Counter Fraud Authority

Recruitment fraud

NHS fraud prevention quick guide

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Working together to **find**, **report** and **stop** NHS fraud

Recruitment fraud

Fraud risks linked to the recruitment process present a significant concern to NHS organisations. This quick guide has been developed to support recruitment teams, human resources (HR) teams and line managers in identifying and preventing fraud during recruitment.

False representation of qualifications or experience is a significant fraud risk within the NHS context; this not only presents significant patient safety concerns but also undermines public confidence in the NHS.

This guide provides practical steps to strengthen internal controls and mitigate risks, helping NHS organisations prevent recruitment-related fraud.

Who is this quick guide for?

This quick guide is intended for recruitment teams, HR teams, temporary staffing teams, and staff responsible for recruiting both internal and external applicants.

Prevention advice

While much of this prevention advice reflects established NHS Employers' standards and long-standing good practice across NHS organisations, intelligence from investigated cases consistently shows that recruitment-related fraud is often enabled not by the absence of controls, but by failures to apply these standard controls robustly in practice.

When recruiting [registered healthcare professionals](#), NHS recruitment teams rely on applicants' registrations with regulatory and licencing bodies such as the [General Medical Council \(GMC\)](#), [Nursing and Midwifery Council \(NMC\)](#) or the [Health and Care Professions Council \(HCPC\)](#). These bodies undertake checks to confirm that applicants hold the relevant clinical qualifications and experience to be on their register and are permitted to practise in their profession.

However, checking an individual's professional registration does **not** guarantee their suitability for a role. Employers must always obtain the necessary assurances by carrying out the full range of checks outlined in the other [NHS Employment Check Standards](#).

This prevention advice also extends to staff recruited via agencies and staff bank. The expectation is that agencies and staff banks will have undertaken the necessary checks, however NHS organisations should seek assurance that the full range of pre-employment checks have been completed.

Employing organisations must also validate any other qualifications related to specialist areas of knowledge or skills that are essential for the role being appointing to.

Governance arrangements

Recruitment teams in the NHS must complete the [nationally agreed pre-employment checks](#) when recruiting staff. The six NHS Employment Check Standards outline the type and level of checks employers are required to carry out before appointing staff to NHS positions. Recruitment policies should therefore be drafted in line with these requirements and clearly outline what is required, including (but not limited to):

- request original documentation of all essential qualifications and certificates. Staff should also be alert to the tampering and alteration of genuine certificates.
- acceptable forms of identification to confirm identity and procedures for right-to-work checks.
- to ensure the legitimacy of a reference, provide guidance on obtaining references from legitimate persons. Preferably, NHS organisations should accept references where a recognised or business email address is used and contains the referees name, job title, and main landline as this reduces the risk of fraud.
- a counter fraud declaration on applications, making it clear that any falsification will be referred to the organisation's Local Counter Fraud Specialist (LCFS) and robustly investigated, with potential prosecution for any fraud offence.

To ensure consistency in the prevention of fraud, recruitment teams should also create a checklist to ensure that all right-to-work documentation, identification, qualifications and references are reviewed. This checklist should be completed in full and signed off by the manager undertaking the review, supporting accountability.

Regular training should be provided to all staff involved in the recruitment process on the relevant policies, procedures, and tools available to support them in carrying out their role effectively.

Reference checks

From a fraud prevention perspective, references help verify that the applicant's employment record is genuine and consistent, reducing the risk of individuals fabricating roles, inflating experience, or concealing conduct issues that may indicate a wider fraud risk. Reference checks should aim to provide details of:

- where the individual has been employed, volunteered or studied
- the dates of employment, volunteering study
- the positions held or course undertaken
- any recent or ongoing disciplinary action or referrals

- the reasons for leaving employment, training or study (where known)
- any discrepancies between the reference and the application that could indicate attempts to misrepresent qualifications or experience.

Employment history and references must be verified in line with NHS Employers standards. Dates and other details should be carefully checked to identify any inconsistencies. References should not be obtained from, or sent to, personal email addresses as this would be difficult to verify the reference is genuine. NHSCFA has seen instances where individuals have created fake email addresses to provide their own reference.

Inter Authority Transfer (IAT)

IAT is a tool within ESR that helps NHS employers verify a candidate's previous NHS employment by identifying any potential overlapping service across NHS organisations. Employers should pursue any identified anomalies to verify information provided by the candidate and prevent recruitment fraud. IAT may also identify instances of dual working or multiple employment when candidates are already in full-time employment but have applied to undertake another role without permission from the first employer. NHSCFA has produced guidance on this type of fraud.

Artificial Intelligence (AI) enablers

AI technology has many positive benefits, but it is also an enabler to fraud and can be used to create false certificates in the name of a genuine or fictional educational institution or awarding body. AI-generated certificates can be highly convincing and may include deliberate imperfections, such as creases and smudges, to enhance their authenticity.

AI can also be used to create entirely false applications and facilitate fraudulent references by generating fake online profiles or personas. In addition, advanced deep fake technology can be used to simulate interviews and enable individuals to be impersonated, either intentionally or maliciously. Some commonly used remote interview platforms also offer AI 'assistant' features which may inappropriately influence interviewees.

To mitigate these risks, recruiting managers should always meet the applicant in person and verify qualifications before they commence employment. The interview process is also critical in testing the authenticity of a candidate's experience by probing the depth and accuracy of information provided in their application. NHS Employers has hosted a webinar on AI-related fraud and security risks in recruitment, which is available via their [website](#).

International recruitment

International recruitment is also at high risk of fraud and the advice in this guidance applies equally in that context. The multi-agency nature of international recruitment can lead to gaps in oversight and unclear ownership of associated risks. More information on the process can be found at the following links:

[Immigration and the skilled worker recruitment process | NHS Employers](#)

[Identifying fraudulent pre-employment documentation: recruitment from outside the UK](#)

Recruitment checklist for internal recruitment/HR teams:

Policies and procedures

- Does your organisation have a recruitment policy that clearly outlines the pre-employment checks required for all applicants (including internal applicants) prior to an offer of employment? This could include a checklist signed off by the employing manager.
- Does your organisation conduct regular audits to ensure adherence to its recruitment policy and NHS Employers' NHS Employment Check Standards?
- Does your organisation conduct regular audits and obtain assurance from agencies to ensure it adheres to your recruitment policy and operates in line with NHS Employers' NHS Employment Check Standards?

Documentation and verification

- Does your organisation request hard copies of all original documentation during the recruitment process?
- Does your organisation check that certificate details - such as names, dates, course titles and grades - match the information provided in the application form?
- Does your organisation obtain additional evidence in cases of name changes due to marriage, civil partnership or divorce?
- Does your organisation retain a copy (scanned or photocopied) of all qualification documents?

- Does your organisation verify whether qualification certificates match other documentation previously provided by the individual, including consistency and authenticity checks via UK ENIC? If there are any doubts about whether an overseas qualification or its UK equivalent is genuine, further information can be obtained through the [UK ENIC website](#).)

Qualification and registration checks

- Does your organisation conduct registration checks with relevant regulators such as the NMC, GMC, and HCPC?
- For Ofqual-regulated qualifications, does your organisation verify them via the awarding organisation? (Use Ofqual's 'Find a regulated awarding organisation' and 'Find a regulated qualification' services).
- Does your organisation seek advice from the relevant UK embassy, consulate or high commission when verifying qualifications awarded outside the UK? (Contact details available via the [Foreign and Commonwealth Office website](#)).
- Does your organisation use UK ENIC's Statement of Comparability to assess overseas qualifications against UK standards and frameworks?

Employment history and references

- Does your organisation use the IAT to verify previous NHS employment and identify overlapping service across NHS organisations?
- Does your organisation use the [NHS Employers cross-referencing tool](#) and conduct thorough, in-person checks to detect false qualifications?

Training and counter fraud awareness

- Does your organisation ensure that the recruitment team receives regular counter fraud training to understand emerging threats and maintain communication channels for reporting concerns?
- Has your organisation ensured that all staff involved in recruitment checks have completed the NHS Employers e-learning modules on employment checks? These include:
 - [Employment checks: understanding requirements for identity checks](#)
 - [Employment checks: understanding requirements for right to work checks](#)
 - [Employment checks: understanding requirements for professional registration and qualification checks](#)

- [Employment checks: understanding requirements for criminal record checks](#)
- [Employment checks: understanding requirements for employment history and reference checks](#)
- [Employment checks: understanding requirements for work health assessments](#)

Key questions for managers:

All NHS employees have a responsibility to report suspected fraud and should be encouraged to do so. A fraudster's colleagues, particularly supervisors, are ideally placed to observe underperformance or other concerns in an individual's role.

Policies and procedures

- Is there a clear performance management policy in place that recognises performance concerns as a potential indicator that an employee has falsely represented their level of qualification and provides detail of the organisation's LCFS?

Documentation and verification

- Do managers meet the employee at interview and, if the interview was remote, again in person to review their qualifications before they commence employment?
- Do managers ensure that recruitment checks are undertaken robustly for both internal and external candidates?
- Do managers check that all certificates appear genuine and relate to a real qualification? This may include checking basic security features and the presentation of the document as well as further enquiries with the awarding body where necessary.
- Do managers retain a copy of certificates (scanned or photocopied) on file? When storing information, employers should ensure they comply with existing data protection legislation.

Qualification and registration checks

- Do managers complete annual revalidation checks on qualifications for employees working in clinical setting? There should be an escalation process where the organisation's LCFS is brought in at an early stage if fraud is suspected.

Training and counter fraud awareness

- Do managers utilise the probation period to evaluate the new employee's performance and any red flags?

Further information

The NHSCFA has developed resources to support organisations tackling recruitment fraud. These can be used to raise awareness, support investigations and strengthen internal controls:

- Employment agency
- Working whilst sick
- Multiple employment

For further information visit the [NHSCFA website](#)

If you suspect fraud

If fraud is suspected the organisation's counter fraud policy and escalation process should be followed immediately and the LCFS contacted for advice (see below).

How to report fraud

Report any suspicions of fraud to the [NHS Counter Fraud Authority](#) online or through the NHS Fraud and Corruption Reporting Line on **0800 028 4060** (powered by Crimestoppers). All reports are treated in confidence, and you have the option to report anonymously. You can also report fraud to your nominated LCFS.

Details of your LCFS [ADD DETAILS]

- Organisation name:
- Name:
- Job Title:
- Email:
- Telephone:
- Mobile:
- Address:



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