

BUILDING A CASE FOR THE USE OF ELECTRONIC DOCUMENT SCANNERS IN THE NHS



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Introduction

The NHS Employment Check Standards outline the mandatory checks that a Healthcare Trust must carry out in the recruitment and ongoing employment of all staff, whether permanent, temporary, volunteers or trainees. Any trust using agencies, contractors or other external bodies to provide services must also regularly audit and monitor those providers to ensure that they also comply with these standards.

Employment Check Standards comprise 6 main areas:

1. Verification of identity validation
2. Right to Work checks
3. Registration and qualification checks
4. Employment history and reference checks
5. Criminal record checks
6. Occupational health checks

Full details of the standards can be found here:

<http://www.nhsemployers.org/your-workforce/recruit/employment-checks/nhs-employment-check-standards>

Failure to comply with NHS Employment Check Standards could potentially put the safety, and even the lives, of patients, staff and the public at risk.

Electronic document scanners can offer effective support to an NHS Trust with 'Verification of identity validation' and 'Right to Work' checks.

Right to Work

The Immigration, Asylum and Nationality Act 2006 (amended in February 2008) stipulates that all employers must check the ongoing entitlement of their employees' right to work in the UK. Failure to do so means that employers risk breaking the law and could face a civil penalty of up to £20,000 per illegal worker.



THERE ARE THREE STEPS THAT EMPLOYERS MUST WORK THROUGH TO CONFIRM A PROSPECTIVE EMPLOYEE HAS THE RIGHT TO WORK IN THE UK:

- ✓ Request Right to Work documents
- ✓ Validate the documents in the presence of the holder
- ✓ Copy the documents, record the date of the check, and store them securely

The majority of employees will present legal and valid documentation to comply with identity validation and Right to Work checks. Illegal documents do, however, continue to be manufactured by professional fraudsters, some to a very high standard, and these counterfeit documents are then used by criminals to fraudulently apply for jobs or claim from the public purse.

2. Electronic Document Scanning explained

Without significant training, staff may not easily be able to judge whether an identity document is genuine. The Home Office recognises the value of electronic scanners in providing 'a quick and easy way to establish the validity of documents presented for identity verification purposes'.

Electronic scanning works by capturing and validating both printed and chip information and then recording and storing the results in a database. It can be used to validate international passports and ID cards, biometric residence permits (BRP's), visas and driving licenses which are presented by employees for NHS employment checks.

Each document takes just a few seconds to scan, using a desktop scanner or mobile device. Advanced scanning features capture information visible to the naked eye and also non-visible information that is far more difficult for counterfeiters to imitate, such as the data held within the document's chip. This makes scanners highly effective when compared to a visual inspection by staff with limited training in examining documents.

Scanners are already being used to validate documents presented to assert and prove identity within parts of the NHS, a number of local authorities, the police and the private sector. Document scanning protects the communities served by an NHS Trust by raising the standards of identification checks. These electronic document scanners support front line staff in validating genuine documents quickly and reliably whilst also screening out counterfeit documents, without the need to invest heavily in ongoing training.

3. The benefits of Electronic Document Scanning

There are many benefits to electronic document scanning solutions compared to a manual check and photocopy:

- Scanning provides a single, consistent process across the organisation for all staff who are required to check identity.
- When an organisation publicises the use of scanners and applicants are notified that ID scanning software is used, this deters those individuals who may seek employment using false documentation.
- With a consistent process which can highlight illegal documentation, the risk of having to prosecute staff is much lower. The associated prosecution costs and the possibility of NHSLA litigation premiums are also reduced as a consequence.
- A scanning application eliminates the need to photocopy and store paper copies of documents which greatly eases the administrative burden on staff. It also means that records are easily accessible for future reference and auditing purposes.
- Using scanning technology enables an HR team to demonstrate their compliance with the NHS Employment Check Standards for Right to Work and identity validation to a higher degree. This, in turn, gives the CQC and the immigration authorities' reassurance of recruitment practices.
- With ever-increasing levels of sophistication, an electronic solution protects your recruitment administrators who would otherwise have to bear the burden of identifying fraudulent documentation.
- With scanning software, staff can be trained on how to use the solution and don't need training updates on how to check new or updated national identity documents.
- If a suspect document is identified, the document scanning vendor provides a Document Helpdesk to help staff review the suspect document, offering an additional level of support to NHS staff.

4. Your options

In order to meet the legal requirements around Right to Work checks and establish a statutory excuse ('the excuse') against payment of a civil penalty, an NHS Trust must be able to show that they have followed due process in accordance with the regulations.

A Trust is required to see an original document or combination of documents from the approved list (full list here: <http://www.nhsemployers.org/~media/Employers/Publications/Right%20to%20work%20checks%20June%202014.pdf>).

As a minimum, staff should then check that the person claiming to own them resembles the photographs on the documents and examine them for any signs of forgery or counterfeiting, including:

- Printing quality including gold-blocking, paper quality and construction
- Watermarks, intaglio printing and latent images
- Alterations to the holder name or the photographs, gender or date of birth
- Extra pages or missing pages, false visas, stamps or residence permits

Further guidance on checking the authenticity of documentation can be found in Appendix 2 of the Identity Check document of the NHS Employment Check Standards.

All documents provided must also be copied and stored either electronically or in hard copy along with a record of the date on which a check was made. Copies of the documents should be kept securely for the duration of the individual's employment and a further six years after their employment has ended.

This check, copy and store process can be handled either manually or electronically.

With manual checking, frontline staff bear the burden of a drawn-out administrative process which leaves them to determine the validity of identity documents. They need regular training updates to help them identify revised identity documents and ensure that they are up to date with changing legislation. Any manual check puts responsibility for making the right decision onto your staff. Copies of all document must be filed and stored securely and accessibly for any future audit requirements.

The introduction of an electronic scanner adds a 'filter' and helps the user decide how to handle a document or an applicant. With electronic scanning technology, a quick, single, consistent process helps users validate documentation or highlight any anomalies.

It is possible for a system to provide a response on the validity of the document in just a few seconds, which may be beneficial in high volume environments. Some electronic document scanning providers also provide investigative support when any anomalies with a document are identified.

5. Key assumptions, dependencies and resources

It is assumed that a scanner will prove significantly more effective when compared to a basic visual inspection by a person with no or limited training in examining documents.

An NHS Trust should consider the purpose served by the use of scanners and the level of knowledge of fraudulent documents amongst staff and weigh this against any purchase, implementation, training and ongoing costs.



WHEN FORMULATING COSTS, A TRUST SHOULD CONSIDER:

- ✓ The ongoing costs of training staff to conduct manual checks
- ✓ Potential civil penalties which could be incurred by a breach
- ✓ Time saved in administrative process during recruitment and on-boarding
- ✓ Potential NHSLA premium savings
- ✓ Whether the project can be seen as a critical anti-fraud measure and therefore funded by the finance department

With the support of their IT function, an NHS Trust could install an electronic scanning solution within one working day, with half a day of training sufficient to get staff up to speed and using the application. A Trust should also investigate the hardware requirements of introducing a scanning solution; a scanning application should be able to run on existing hardware and require little additional investment.

Confidence in your compliance

More than 40 NHS Trusts already use TrustID to validate identity documents. For more information on identity validation solutions, please visit: www.trustid.co.uk

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