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Suspicious CEO Payment Request Prevented
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National cases

£300,000 stolen from Trust

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Spring 2026

fraudtalk

Focus on...



Dual Working in the NHS: When Secondary Employment Becomes Fraud

Many NHS staff have secondary employment and when managed transparently, this can be entirely legitimate. Problems arise when secondary work is hidden and dishonesty follows.

Dual working refers to situations where an employee works for more than one employer at the same time. In the NHS, this often includes:

- Bank or agency work
- Private sector roles
- Employment with another NHS organisation
- Self-employment or business interests

Having a second job is not, in itself, misconduct. Failing to declare it — and being dishonest about time and attendance — is where serious issues arise.

The risk we're seeing

A recurring pattern in NHS fraud investigations involves staff who:

- Fail to declare secondary employment as required by Trust policy
- Work overlapping hours across two employers



- Claim to be sick or request special leave from one employer in order to work elsewhere
- Alternate sickness or leave between employers to "juggle" both roles

This behaviour is dishonest and undermines trust, particularly where staff are being paid while not genuinely available for work.

Why this matters

Claiming sick leave or special leave when you are fit for work — but instead working for another employer, or working for one employer when you should be working for another — are all forms of false representation, and can be prosecuted under the Fraud Act 2006.

This behaviour takes money away from patient care, places unfair pressure on colleagues covering absences and undermines public confidence in the NHS.

Cases of undeclared dual working and false sickness are not treated lightly. Depending on the facts, consequences can include:

- Disciplinary action leading to summary dismissal.
- Recovery of monies via salary deduction, civil action, or via court orders.
- Referral to regulators such as the NMC, GMC, HCPC or other professional bodies. This can result in potential sanctions including conditions of practice, suspension or removal from the register.
- Criminal sanctions, ranging from custodial sentences, conditional cautions, and penalties including fines, and confiscation of assets.

All staff have a responsibility to:

- Declare secondary employment and business interests honestly and promptly.
- Ensure there is no conflict with NHS duties or contracted hours.
- Be truthful about sickness and leave.
- Follow Trust policies and contractual obligations.

If circumstances change, declarations must be updated — silence is not neutrality.

Early advice prevents escalation

Many investigations begin with issues that could have been resolved early through advice and transparency. If you are unsure whether something needs to be declared, or how secondary employment might affect your role:

- Speak to your manager
- Review your Trust's policies
- Contact your Local Counter Fraud Specialist (LCFS) for confidential advice

Being open protects you. Being dishonest can cost you your job, your professional registration and, in some cases, your freedom.

Abuse of Position: A Fraud Risk We Can't Ignore

Trust is central to how the NHS works — and abusing that trust can be a criminal offence.

What does the law say?

Section 4 of the Fraud Act 2006 creates the offence of fraud by abuse of position. It applies where a person:

- Holds a position of trust
 - Dishonestly abuses that position
 - Intends to make a gain or cause loss (or risk of loss)
- Crucially, no actual loss needs to occur. The dishonest intent is enough.

Why is this relevant to the NHS?

Many NHS roles involve safeguarding public money and resources. Abuse of position can arise in any role, but is commonly linked to:

- Recruitment and selection
- Procurement and contract management
- Finance, payroll and invoicing
- Rostering, authorisation and approvals

What might this look like in practice?

Examples include:

- Approving payments or timesheets you know are false
- Manipulating recruitment to favour someone you know

- Failing to declare a conflict of interest and benefiting privately
- Using NHS systems or authority for personal gain

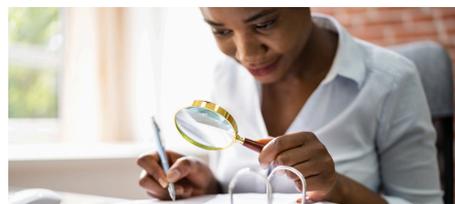
The consequences

Abuse of position is treated seriously and can result in:

- Up to 10 years' imprisonment
- Unlimited fines and confiscation of assets
- Dismissal and long-term professional consequences

If in doubt, speak to your Local Counter Fraud Specialist (LCFS). Early conversations prevent serious outcomes.

Fraud prevention protects patients, staff and the NHS as a whole.



The Bribery Act 2010: Staff must: ✓

Responsibilities for Staff and Suppliers

The NHS has zero tolerance for bribery and the law applies to everyone we work with.

What is bribery?

Under the Bribery Act 2010, bribery involves offering, giving, requesting or receiving an advantage to induce improper performance.

An "advantage" is not just cash. It can include:

- Gifts or hospitality
- Discounts or free services
- Job offers or work opportunities
- Preferential treatment or inside information

Staff must not: ✗

- Accept gifts or hospitality that could influence decisions
- Accept gifts from current or prospective suppliers
- Offer advantages to suppliers or contractors
- Use their role to improperly benefit others

Staff must: ✓

- Declare gifts and hospitality in line with Trust policy
- Refuse and report inappropriate offers
- Seek advice if unsure — uncertainty is a warning sign

Responsibilities of suppliers and contractors

Suppliers working with the NHS must:

- Not offer inducements to secure or influence NHS business
- Ensure their staff understand NHS standards
- Have adequate anti-bribery controls in place

Organisations can be prosecuted for failing to prevent bribery, even if senior leaders were unaware.

Why this matters

Bribery undermines:

- Fair competition
- Value for money
- Public confidence

Consequences include criminal prosecution, unlimited fines, contract termination and exclusion from future NHS work.

Ethical relationships protect both the NHS and its partners.

Fraud & Bribery Training: When Did Your Team Last Have It?

Fraud risks evolve — training must keep pace.

Why regular training matters

Fraud and bribery awareness training helps staff:

- Recognise real risks relevant to their roles
- Understand legal and policy responsibilities
- Spot early warning signs
- Feel confident raising concerns

Teams with up-to-date training are far more effective at preventing fraud.

Our recommendation

If your team has not received fraud and bribery training in the last two years, it's time for a refresh. Training can be tailored for:

- Clinical teams
- Managers and budget holders
- Recruitment and People and Culture
- Procurement and contract management
- Finance and payroll

Contact your Local Counter Fraud Specialist (LCFS) to discuss your team's needs and book a session.

fraudtalk

This edition of *FraudTalk* has been compiled by Zenda Butler, Head of Counter Fraud. You'll find information about local and national fraud cases as well as general advice about fraud issues.

Reminder – what to do if you suspect fraud

Do

- Report your suspicion to your LCFS immediately. If the problem is ignored, it may get worse and if it isn't addressed more money might be lost to the organisation.
- Deal with the matter promptly- the sooner it's reported the sooner the problem can be dealt with.
- Keep any evidence safe. Your LCFS will need this to form part of the case. Please don't write on it.
- Make notes on what you know/have heard or seen. It makes you more credible as a witness if you can be sure of what you're saying.

Don't

- Don't rely on someone else to make the call—the chances are they are hoping someone else will do it too.
- Don't ignore it.
- Confront any suspect yourself directly, this could give them time to destroy or remove evidence. The LCFS will notify the individual at the appropriate time.
- Start an investigation yourself. The LCFS has had specialist training to collect evidence to meet the standard required for admission in court. Any relevant findings will be shared with the health body and professional bodies so that disciplinary action can also be considered, if appropriate.
- Discuss your concerns with anyone other than the LCFS or the Director of Finance/Chief Finance Officer - you don't know whether others are involved or if they are linked to the subject.
- If you're not sure whether or not what you have found constitutes fraud or bribery or can be investigated by the LCFS, please contact your LCFS anyway. It is better that you report a concern so that we have the opportunity to decide whether we can investigate, rather than missing an opportunity to deal with suspected fraud.

ELFT's Counter Fraud Service delivers an in-house counter fraud service to East London NHS Foundation Trust (ELFT) and also provides North East London NHS Foundation Trust's (NELFT) Counter Fraud Service.

Introducing the team



Zenda Butler

Zenda is the Head of Counter Fraud at ELFT. Also the lead Local Counter Fraud Specialist (LCFS) for ELFT.



Beth Raistrick

Beth Raistrick is the LCFS responsible for all referrals relating to fraud and bribery within ELFT's Bedfordshire and Luton services.



Daniel Higgs

Daniel is the LCFS for NELFT and works across NELFT sites.



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FraudTalk: Guess the Words Challenge

Theme: "Spotting Fraud Before It Happens"

1. Dishonest use of your job role for personal gain, could be classed as an -----of position under the Fraud Act 2006 (5 letters)
2. The specialist you should contact for fraud concerns (4 letters)
3. Offering or receiving an inducement is known as _____ (7 letters)
4. Fake invoices are often sent to the _____ department (7 letters)
5. If an NHS employee is a director in a company they have commissioned to do work at their NHS Trust, this is a -----of interest (8 letters)

Answers:
1. ABUSE
2. LCFS
3. BRIBERY
4. FINANCE
5. CONFLICT

Fraud in the Finance Department: £300,000 Stolen from the NHS

A serious case of fraud in a Trust finance department has resulted in multiple convictions. The offences involved a finance employee abusing their position to facilitate fraudulent refund claims, with funds transferred to accounts linked to co-conspirators.

The scheme was uncovered after staff noticed suspicious refund requests relating to monies held on behalf of patients and clients. Internal checks revealed links between the finance employee and the accounts receiving the fraudulent payments.

Investigators from the NHS Counter Fraud Authority used their powers to trace the stolen funds. The total value of fraud identified exceeded £302,000, including both paid-out and prevented claims.

Consequences

- The primary employee received a custodial sentence.
- Co-conspirators received a mix of custodial and suspended sentences.
- Recovery of stolen funds is ongoing.

This case highlights the serious impact of abuse of position fraud: it diverts public money away from patient care, damages trust, and carries criminal, professional, and financial consequences.



Key Takeaways for Staff

- Always follow policies for processing refunds and financial transactions.
- Be vigilant for unusual requests or patterns.
- Report suspicions promptly to your Local Counter Fraud Specialist (LCFS).

Source: <https://cfa.nhs.uk/about-nhs/cfa/latest-news/NHSCFA-investigation-results->

ELFT case

Suspicious CEO Payment Request Prevented

The Trust's Chief Finance Officer (CFO) received an email appearing to come from the Chief Executive Officer (CEO) requesting payments to be processed.

Due to the vigilance of the CFO and adherence to established financial controls, the request was identified as suspicious. The email had not originated from the CEO and was confirmed to be an attempted mandate/impersonation fraud.

The matter was immediately referred to the Local Counter Fraud Specialist (LCFS) and a staff alert was circulated across the organisation to raise awareness of this fraud typology.

As a result of the prompt action taken and the effectiveness of existing controls, a financial loss of £22,000 was prevented.

Lessons Learned for Staff

Fraudsters frequently impersonate senior staff to create urgency and pressure quick decision-making. Staff should:

Stop and verify

- Always independently verify payment requests, especially those marked urgent or confidential

- Contact the requester using a known telephone number — not the contact details in the email
- Never rely solely on email confirmation for payment instructions

Be alert to red flags

- Requests to bypass normal procedures or approvals
- Changes to bank details
- Unusual tone, spelling or email address variations
- Pressure to act quickly or keep the request secret
- Requests received outside normal working hours

Follow Trust processes

- Do not override financial controls, regardless of the seniority of the requester
- Apply segregation of duties at all times
- Escalate suspicious requests to your manager and the LCFS immediately

Report early

- Even if no money has been lost, reporting allows preventative action and helps protect other NHS organisations

Highlights of the work undertaken at NELFT since 1st April 2025

- 40 referrals
- 1 dismissal, 3 agency workers blocked from working and 4 successful prosecutions
- £1,816 recovered and more in progress –
- £57,802 fraud prevented
- 15 recommendations to address system weaknesses/improve controls

Highlights of the work undertaken at ELFT since 1st April 2025

- 48 referrals
- 5 dismissals, 1 final written warning and 3 successful prosecutions
- £54,923 fraud and non-fraud prevented £41,661 recovered
- 27 recommendations