

Your response

1. Context

JobsAware provides an online platform for workers and work-seekers in the UK to report labour market abuses, including issues relating to online job scams and fraud.

As part of our broader work on pioneering the concept of ‘Collective Regulation’ - which brings together the voices of worker, business and government to identify and solve problems in different sectors of the labour market – we are conducting a pilot study in the online recruitment space, where we have historically received a lot of fraud reports.

This has culminated in the creation of a certification scheme, initially aimed at tackling online job advertising fraud, alongside major UK online recruitment platforms and the Employment Agency Standards Inspectorate. It is being developed to help demonstrate compliance with relevant duties of the Online Safety Act, such as those in section 7.2.

The intention behind this response is to offer an overview of the scheme and the types of fraud we see in the online recruitment space. As we implement a pilot of the scheme with online platforms during H1 2024, we will also be able to share deeper insights into how well Ofcom’s proposed Codes of Practice and regulatory approach aligns with this work.

2. Online Recruitment Scheme overview

The scheme itself came from JobsAware’s Online Recruitment Forum, made up of some of the UK’s largest online recruitment platforms (including Indeed, Adzuna, Totaljobs, CV Library, reed.co.uk and others) and representatives from supportive areas of government (including DBT and Home Office), informed by fraud reports received by work-seekers through the JobsAware platform.

The starting point was the drafting of a simple Code of Practice that covers the prevention of fraud in ‘advertising services’; which includes publishing adverts and direct advertising to users. To keep the pilot scheme focused, initially it covers only the ‘publishing adverts’ elements of the Code (job scams & fraud).

With the agreement of Forum members, JobsAware then engaged with a certification body partner to turn the Code of Practice into a set of scheme requirements. The intention is to go through the UKAS accreditation process, once the scheme has been successfully piloted and the requirements refined with scheme members.

Forum members were then invited to participate in the pilot scheme, of which several have already signed up and more are likely to follow soon. A press release to accompany the launch of the pilot has gained support from the UK’s Anti-Fraud Champion, Simon Fell MP, as well as the Minister for Enterprise, Markets and Small Business.

As we now move into scheme implementation with pilot members, this process focuses on:

- Agreeing metrics by which to judge the success of the pilot
- Comparing the scheme Code of Practice and requirements to the proposed Codes of Practice laid out by Ofcom, to maximise alignment and provide further feedback
- Writing and discussing detailed guidance documents for pilot members that cover how to meet requirements
- Setting out a two-stage auditing process, with the first stage being to help members identify where there are potential issues, so they can be remedied
- Understanding how well the requirements work in practice, so that they can be refined and adjusted where needed
- Testing technology built by JobsAware to help scheme members report and share suspected instances of fraud with each other (known as an 'Ad Vetting System').

Initial drafts of the Code of Practice and scheme requirements are linked to below:

- [‘Preventing Fraud in Advertising Services’ Code of Practice](#)
- [Online Recruitment Scheme requirements](#)

3. Fraud in the online recruitment space

The JobsAware platform has been live since June 2021, however the Community Interest Company behind it (SAFERjobs) has been working since 2008 to tackle fraudulent job advertisements. The aim of the actors behind these fraudulent job advertisements is typically to obtain the personal data of work-seekers, or to defraud them out of money. However, there are other scenarios that fraudulent job advertisements facilitate, such as: overseas workers being sold fake visas and relocating with no right to work; work-seekers being employed into modern slavery and debt bondage situations or work-seekers being employed into pyramid schemes and often working for little to no pay.

JobsAware receives an average of 5 reports per day on a range of labour market abuses, including fraudulent job adverts as well as non-payment of wages and modern slavery. We have frequently been identified as a key contributor of data to labour market regulators and have been included in every Labour Market Enforcement Strategy.

66% of reports received by JobsAware are relating to fake or fraudulent job adverts, which is our largest data set. Since June 2021, JobsAware has received 1290 reports relating to fraudulent job advertisements. In 2023 we noted a 109% increase in fraudulent job advertisement reports compared to 2022, highlighting that the issue of fraudulent job advertisements continues to grow.

In that time, we have recorded over £750,000 of losses by individuals from fake and fraudulent jobs advertised online. This calculates as an average of £584 per work-seeker that encounters a fake job.

A variety of case studies are available on request.

4. A new trend on the rise

Whilst most of the fraudulent job advertisement reports JobsAware receives are related to advertisements placed on online recruitment platforms (job boards etc), during the latter half of 2023 we have noted a growing trend of job scams being sent directly to individuals using social media platforms and messaging apps (such as WhatsApp). Often these fraudulent advertisements are impersonating legitimate recruitment agencies to attempt to seem real. The consequences not differing much to those listed above – loss of data, loss of money or unlawful working conditions.

The Online Recruitment Scheme does not cover such cases, as there is no intermediary offering an ‘advertising service’ - it is simply user-to-user messaging. It is likely this issue will only grow if left unchecked and would welcome further discussions on how it could be effectively addressed.