

## **Illegal Workers Policy**

### **1. Purpose**

This policy outlines our commitment to preventing illegal working within our organization, ensuring compliance with the Immigration, Asylum & Nationality Act 2006 and related Home Office guidance.

### **2. Identification of Foreign Workers**

Our organization identifies foreign workers and their nationalities through:

- Collection of valid identification documents (e.g., passports, national ID cards)
- Verification of visas and work permits
- Use of the Home Office online right to work checking service

### **3. Compliance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006**

To ensure compliance, we:

- Conduct right to work checks before employment begins
- Follow the prescribed steps to establish a statutory excuse against liability for a civil penalty
- Maintain records of all checks conducted

### **4. Applicability of Controls**

The controls outlined in this policy apply to:

- All potential employees during the recruitment process
- All current employees throughout their employment

### **5. Verification of Right to Work Documents**

We ensure that documents used to verify the right to work are:

- Compliant with the Home Office guidance "Comprehensive Guidance for Employers on Preventing Illegal Working"
- Retained for at least 2 years after the individual has left our employment

### **6. Inclusion of Agency, Self-Employed, and Subcontracted Personnel**

Our checks and controls extend to:

- Agency workers
- Self-employed individuals (checks will be undertaken to ensure self-employed with HMRC as required)
- Subcontracted personnel (All security staff will be employed under the PAYE scheme)

### **7. Periodic Reviews**

We conduct periodic reviews of the right to work status for all workers, including:

- Agency workers
- Temporary employees
- Seasonal employees

### **8. Record Keeping**

All documentation related to right to work checks is securely stored and retained in accordance with legal requirements.

### **9. Training and Awareness**

We provide regular training to all relevant staff on:

- Conducting right to work checks
- Identifying fraudulent documents
- Understanding the legal implications of employing illegal workers

### **10. Reporting and Monitoring**

We have established a reporting mechanism for any concerns related to illegal working. Regular audits are conducted to ensure ongoing compliance with this policy.

Signed: Siobhan Hamill

Position: Managing Director

Date: 16/10/2025

Signature:



**RAYAN**  
FACILITIES MANAGEMENT LTD