

QBD.29 Illegal Workers Policy

1. Purpose

This policy outlines our commitment to preventing illegal working within our organisation, ensuring compliance with the Immigration, Asylum and Nationality Act 2006 and the latest Home Office employer guidance on preventing illegal working.

2. Identification of Foreign Workers

Our organisation 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 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 Home Office guidance “Comprehensive Guidance for Employers on Preventing Illegal Working”
- Retained for at least two 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 confirm their self-employed status with HMRC, where 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 relating 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 concerns related to illegal working, including concerns raised by managers, workers, clients or third parties.

Regular audits are conducted to ensure continued compliance with this policy.

Signed:



Siobhan Hamill

Position: Managing Director

Date: 10-03-2026