

Is your supply chain covered?

The right-to-work checklist

Since 1 October 2026, your business can be fined up to **£45,000 per worker** (£60,000 for a repeat breach) if anyone working for you through a subcontractor, agency or online platform doesn't have the right to work in the UK, even if you never hired them directly. Your defence, the **statutory excuse**, only counts if the right protections were in place **before work started**.

How to use it. Answer each question for your business today. It takes about 10 minutes.

What it tells you. Every "No" or "Not sure" is a gap in your defence. Page 2 shows what your answers mean.

01 Know how people come to work for you

	YES	NO	NOT SURE
We have a current list of every subcontractor, agency and platform that supplies people to us.	☐	☐	☐
We know which of them use their own subcontractors (second tier and below).	☐	☐	☐
We know which suppliers or self-employed workers can send a substitute in their place.	☐	☐	☐
One named person is responsible for right-to-work compliance across the supply chain.	☐	☐	☐

02 Contract terms

Our subcontract terms require every supplier to carry out right-to-work checks before anyone starts work.	☐	☐	☐
They stop suppliers subcontracting further without our prior written consent.	☐	☐	☐
They require suppliers to pass the same obligations down to their own subcontractors.	☐	☐	☐
Existing contracts have been updated, not just the template for new suppliers.	☐	☐	☐

03 Substitutes and stand-ins

No substitute can start until their right to work has been confirmed.	☐	☐	☐
Checks are never left to the worker to arrange or prove for themselves.	☐	☐	☐
We would know if a different person turned up to a shift or job than the one arranged.	☐	☐	☐

04 Identity on site

	YES	NO	NOT SURE
We can confirm the person on site is the person who was checked, for example by site pass, sign-in or facial match.	☐	☐	☐
Any digital checks use an identity provider certified for right-to-work checks, not just general ID checks.	☐	☐	☐
Site and shift managers know what to do when someone can't be matched to a completed check.	☐	☐	☐

05 Evidence

We can show that each control was in place before each person started, with dated records.	☐	☐	☐
Follow-up checks for people with time-limited permission to work are scheduled.	☐	☐	☐
Records containing passport or ID details are stored securely, with access limited to those who need it.	☐	☐	☐
We could produce this evidence within a day if Home Office Immigration Enforcement visited.	☐	☐	☐

What your answers mean

All "Yes"

Your defence looks well established. Keep testing it: suppliers change, and evidence goes out of date.

1–5 "No" or "Not sure"

You have gaps. Each one could mean your defence fails for the workers it affects.

6 or more

Your supply chain is likely exposed. Treat this as a priority, especially in sections 02 and 03.

Work out your exposure

Count the workers supplied through routes where you answered "No" or "Not sure", then multiply by the first-breach maximum.

_____ workers × £45,000 = £ _____ maximum potential penalty

Want a second opinion on your answers?

Book a free 15-minute call. We'll talk through your gaps and whether a fixed-fee Readiness Check (£1,950) makes sense for you.

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Based on the Border Security, Asylum and Immigration Act 2025 (section 48, in force 1 October 2026) and the Home Office Employer's guide to right to work checks. This checklist is general information as at October 2026 and is not legal or immigration advice. It does not cover every requirement of the statutory excuse, and we don't advise on whether a particular person has the right to work in the UK.