
Right to Work (RTW) Policy

February 2026

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Policy brief & purpose

Employers must examine specific documents to ensure that employees and workers have the legal right to work in the UK.

While it is the individual's obligation to gain the right to work and submit the necessary documents, it is ultimately DSG's responsibility to guarantee that all of its employees have the right to work in the UK.

Scope

This policy applies to permanent, fixed term and casual staff equally. This policy applies to all employees of Danny Sullivan Group Limited (DSG) and its subsidiaries (Danny Sullivan & Sons Ltd, Diamond Construction & Engineering Recruitment Limited, and Danny Sullivan Group Academy Limited), contractors, workers, agency workers and volunteers.

General Principles

Acceptable documents

There are two lists of documents that are accepted as proof of a worker's permission to work in the United Kingdom.

List A contains documentation proving an indefinite right to work in the UK, whereas List B contains documents proving a restricted right. Additional inspections will be necessary for List B documents.

On the gov.uk website, the Home Office provides a checklist that includes both listings – a copy of which is held at **Appendix A** of this policy.

Process for checking

Before the individual begins work, all documents must be reviewed.

As part of the screening and onboarding process, the candidate will be required to provide appropriate proof of right to work and should not be permitted to begin work until this proof is documented.

One of the following three checks must be completed to establish a right to work:

- A manual check
- Check via an IDSP
- Online check

Manual Check

Step1 – Obtain

If conducting a manual check – the acceptable documents are as per Appendix A must be reviewed.

Step 2 – Check

The documents must be checked as genuine and that the person presenting them is the prospective employee or employee, the rightful holder and allowed to do the type of work you are offering.

1. Check photographs are consistent across documents with the person presenting themselves for work
2. Check the dates of birth are correct and consistent across documents
3. Check any expiry dates for time limited permission to be in the UK are in the future (i.e they have not passed) (if applicable)
4. Check work restrictions to determine if the person is able to work for you and do the type of work you are offering. (For **Students** who have limited permission to work during term time, you **must** also obtain, copy and retain details of their academic term and vacation times covering the duration of their period of study in the UK for which they will be employed)
5. Take all reasonable steps to check that the document is genuine, has not been tampered with and belongs to the holder
6. Check the reasons for any different names across documents (e.g marriage certificate, divorce decree, deed poll). Supporting documents should also be photocopied and a copy retained.

Step 3 – Copy

You must make a **clear copy** of each document in a format which cannot manually be altered and retain the copy securely: electronically or in hardcopy.

You must also retain a secure record of the date on which you made the check.

You must copy and retain copies of:

Passports: any page with the document expiry date, the holder's nationality, date of birth, signature, immigration permission, expiry date, biometric details, photograph and any page containing information indicating the holder has an entitlement to enter or remain in the UK (visa or entry stamp) and undertake the work in question (the front cover no longer has to be copied).

All other documents: the document in full, both sides of an immigration status document and an Application Registration Card.

All copies of documents taken should be kept securely for the duration of the worker's employment and for two years afterwards. The copy must then be securely destroyed.

Know the type of excuse you have

If you have correctly carried out the above 3 steps you will have an excuse against liability for a civil penalty if the above named person is found working for you illegally. However, you need to be aware of the type of excuse you have as this determines how long it lasts for, and if, and when you are required to do a follow-up check.

The documents that you have checked and copied are from:

1. **List A** contains the range of documents you may accept for a person who has a continuous right to work in the UK (including British and Irish citizens). If you conduct the right to work checks correctly before employment begins, you will establish a **continuous statutory excuse for the duration of that person's employment with you**. You do not **have** to conduct any follow-up checks on this individual.

2. **List B** contains a range of documents you may accept for a person who has a temporary right to work in the UK. If you conduct the right to work checks correctly, you will establish a **time-limited statutory excuse**. You will be required to conduct a follow-up check in order to retain your statutory excuse.

You will **not** obtain a statutory excuse if:

- it is reasonably apparent that the person presenting the document is not the person referred to in that document, even if the document itself is genuine
- you know that the individual is not permitted to undertake the work in question
- you know that the documents are false or do not rightfully belong to the holder.

You may wish to include a declaration in line with the check, such a statement could include:

'I confirm that I have carried out the right to work check above in compliance with the instructions within and I believe a valid statutory excuse is established for this worker.'

IDVT Check using an IDSP

The Home Office recommends that employers only accept checks via an IDSP, that satisfy a minimum of a Medium Level of Confidence.

It is not mandatory for you to use a certified provider: you may use a provider not featured within this list if you are satisfied that they are able to provide the required checks.

For the purposes of verifying identity for RTW checks through IDVT, only the following specified documents can be accepted:

- valid British passport
- valid Irish passports
- valid Irish passport cards

Please see the following steps for an employer to conduct a right to work check via an IDSP

1. Have you obtained an IDVT identity check which shows that there exists in relation to the employee a relevant IDVT document from an IDVT identify provider?
2. Are the photograph and biographic details (for e.g. date of birth) on the output from the IDVT check consistent with the individual presenting themselves for work (i.e the information provided by the check relates to the individual and they are not an imposter)?
This can be done in person or by video call
3. Have you retained a clear copy of the IDVT identify check output in a format which cannot subsequently be altered?
This must be for the duration of employment and for two years after the employment has come to an end
4. Do you reasonable believe that the IDVT identify service provider has taken all reasonable steps to check the validity of the document?
5. Do you reasonable believe that the IDVT identity service provider recorded the date on which the check was carried out in a format that cannot be subsequently altered?
6. Do you reasonable believe that the IDVT identity service provider is satisfied that the photograph of the employee and the date of birth is consistent with the appearance of the employee?
7. Do you reasonable believe that the IDVT identity service provider has taken all reasonable steps to verify the employee is the rightful holder of the document?

8. Do you reasonable believe that the IDVT identity service provider has retained a clear copy of the following pages of the passport which is not in the form of a card, in a format which cannot be subsequently altered?
 - a. Any page containing the holder's personal details including nationality;
 - b. Any page containing the holder's photograph
 - c. Any page containing the date of expiry

9. Do you reasonable believe that the IDVT identity service provider has retained a clear copy of the whole of a travel document in the from of a card, in a format which cannot be subsequently altered?

Home Office Online right to work check

A Home Office online right to work check will provide you with a statutory excuse against a civil penalty in the event of illegal working involving the subject of the check, provided the check is carried out before the commencement of employment and at the prescribed intervals.

Currently, the Home Office online service supports checks for a range of individuals, depending on the type of immigration documentation they are issued with.

Those who apply for immigration status are now issued with an eVisa and are no longer issued physical immigration documents as proof of their immigration permission in the UK. Individuals with an eVisa are only able to use the Home Office online service to evidence their right to work.

Please see the following steps to conduct an online right to work check:

1. Use the Home Office online right to work checking service <https://www.gov.uk/viewright-to-work> on GOV.UK, enter the 'share code' provided to you by the individual and enter their date of birth.
2. Check that the online check confirms that the employee named in it is allowed to work in the UK and is allowed to carry out the work in question.
3. Satisfy yourself that the photograph on the online right to work check is of the individual presenting themselves for work (i.e. the information provided by the check relates to the individual and they are not an imposter). This can be done in person or by video call.
4. If the employee or prospective employee is a student who has permission to work for a limited number of hours per week during term time whilst studying in the UK, obtain and retain details of the term and vacation dates of the course that the employee is undertaking.

5. Retain evidence of the online right to work check. This should be the 'profile' page confirming the individual's right to work. You should store this securely, (electronically or in hardcopy) for the duration of employment and for two years afterwards. The file must then be securely destroyed. You should also be able to produce these document copies quickly in the event that you are requested to show them to demonstrate that you have performed a right to work check and retain a statutory excuse.

Failure to provide valid Right to work

Failure of the prospective employee or employee to provide ongoing evidence of right to work in the UK could result in the offer of employment being withdrawn, or in the case of an existing employee and ongoing right to work relating to time limited evidence, employment being terminated under the disciplinary process.



Russell Deards
General Counsel & Company Secretary
1st February 2026

Appendix A

The following guidance confirmed the acceptable documents that can be presented to provide a manual right to work check.

If your right to work is via a Share Code, please provide this along with confirming your Date of Birth so the check can be completed via the Home office Online right to work checking service.

List A

1. A passport¹ (current or expired) showing the holder is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK.
2. A passport or passport card¹ (in either case, whether current or expired) showing that the holder is an Irish citizen.
3. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man, which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted unlimited leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules.
4. A current passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK².
5. A current Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
6. A birth or adoption certificate^{3,4} issued in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
7. A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
8. A certificate of registration or naturalisation as a British citizen, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.

List B group 1

1. A current passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to do the type of work in question⁵.
2. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man, which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted limited leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules.
3. A current Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in the UK, and is allowed to do the type of work in question, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.

List B group 2

1. A document issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules (known as the EU Settlement Scheme) on or before 30 June 2021 together with a Positive Verification Notice from the Home Office Employer Checking Service.
2. A Certificate of Application (non-digital) issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules (known as the EU Settlement Scheme), on or after 1 July 2021, together with a Positive Verification Notice from the Home Office Employer Checking Service.
3. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man showing that the holder has made an application for leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules or Appendix EU to the Immigration Rules (Bailiwick of Guernsey) Rules 2008, or Appendix EU to the Isle of Man Immigration Rules together with a Positive Verification Notice from the Home Office Employer Checking Service.
4. An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.
5. A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question.

Footnotes

- 1 A clipped passport is a cancelled document (identified by the corners of certain pages in the passport being cut/removed) and therefore is not acceptable proof of right to work.
2. 'Definition includes those with a document which shows that the holder is entitled to readmission to the UK (RUK endorsement)' and ILR endorsements from a Crown Dependency.
3. Definition includes a short or long birth certificate.
4. Definition includes a birth certificate issued by a UK diplomatic mission (British Embassy or British High Commission) and consular birth certificates.
5. This includes a current passport endorsed with a stamp showing an individual has been granted leave to enter and there are no work-related conditions attached. If, under the conditions of the individual's leave, work was restricted or prohibited the endorsement placed in the individual's passport would explicitly set that out as a condition.