Right to Work Policy Rev 2.0

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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 all individuals engaged by DSG where a right to work check is required, including permanent, fixed-term and casual employees and workers, and individual subcontractors where applicable.

Employment or engagement is subject to satisfactory completion of the required right to work checks before work commences.

Where an individual is engaged through a third party or contractual chain, responsibility for right to work checks will be determined in accordance with the applicable legislation, contractual arrangements and current Home Office guidance.

General Principles

DSG will carry out right to work checks in accordance with current Home Office requirements and will ensure that the appropriate check is completed before an individual commences work.

There are three prescribed methods of establishing a statutory excuse against liability for a civil penalty:

- a manual right to work check;
- a Home Office online right to work check; or
- a right to work check using a registered Right to Work Digital Verification Service Provider (RtW DVSP), where applicable.

The appropriate method will depend on the individual's nationality, immigration status, documentation and the requirements of the Home Office right to work checking process.

DSG will not require an individual to use a particular method of demonstrating their right to work and individuals will be provided with a reasonable opportunity to demonstrate their right to work and DSG will apply its checking procedures consistently and without unlawful discrimination.

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.

You can review the current guidance on .gov via this link: Right to work checks: an employer's guide - GOV.UK

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 prescribed checks must be completed to establish a statutory excuse against liability for a civil penalty:

1. A manual right to work check;
2. A Home Office online right to work check; or
3. A right to work check using a registered Right to Work Digital Verification Service Provider (RtW DVSP), where applicable.

1) Manual Check

Manual checks must be completed using the original acceptable documents. A photograph, scan or copy of a physical document must not be accepted as a substitute for inspecting the original document.

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 being offered.

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 can work doing the type of work being offered. (For **Students** who have limited permission to work during term time, it is necessary to 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 tempered 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

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

Retain a secure record of the date on which you made the check.

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 has been established

Correctly carrying out the above 3 steps will provide an excuse against liability for a civil penalty if the candidate is found working illegally. However, its important to note the type of excuse established as this determines how long it lasts for, and if, and when it is necessary to do a follow-up check.

The documents checked and copied are from:

1. **List A** contains the range of documents which may be accepted for a person who has a continuous right to work in the UK (including British and Irish citizens). If the right to work checks have been conducted correctly before employment begins, this will establish a **continuous**

statutory excuse for the duration of that person's employment with you. There is no need to conduct any follow-up checks on this individual.

2. **List B** contains a range of documents which may be accepted for a person who has a temporary right to work in the UK. If the right to work checks have been conducted correctly, this will establish a **time-limited statutory excuse**. There is a requirement to conduct a follow-up check in order to retain a statutory excuse.

A statutory excuse is **not** established 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
- it is known that the individual is not permitted to undertake the work in question
- if is known that the documents are false or do not rightfully belong to the holder.

It may be sensible 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.'

2) Right to Work Digital Verification Service Provider (RtW DVSP)

DSG may use a Right to Work Digital Verification Service Provider (RtW DVSP) to complete the digital identity verification element of a right to work check.

Where this method is used, DSG will use a RtW DVSP that is registered with the Office for Digital Identities and Attributes (OfDIA) to provide right to work checks.

DSG will follow the Home Office requirements applicable to the use of a RtW DVSP and will retain the required evidence of the check.

Where a RtW DVSP check is used, DSG will ensure that the required identity and right to work verification process has been completed and that any relevant restrictions on the individual's right to work have been identified and recorded.

Where facial recognition technology is used as part of the digital verification process, DSG will retain the required comparison and service output in accordance with the applicable Home Office requirements.

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

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

Steps for an employer to conduct a right to work check using a RtW DVSP

1. Has the RtW DVSP completed the required verification of the individual's identity document and provided an appropriate verification output?

2. Are the photograph and biographical details (for example, date of birth) provided through the RtW DVSP 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, by video call or, where applicable, using facial recognition technology through a registered RtW DVSP. See Appendix B for more information. You can review the full guidance here Right to work checks: an employer's guide - GOV.UK

3. Have you retained a clear copy of the RtW DVSP verification output in a format which cannot subsequently be altered?
   This must be retained for the duration of employment and for two years after the employment has come to an end.

4. Do you have reasonable grounds to believe that the RtW DVSP has taken the required steps to verify the validity of the identity document?

5. Do you have reasonable grounds to believe that the RtW DVSP has recorded the date on which the check was carried out?

6. Do you have reasonable grounds to believe that the RtW DVSP has taken the required steps to verify that the individual is the rightful holder of the identity document?

7. Where facial recognition technology has been used, have you retained the facial comparison (imposter check) provided by the RtW DVSP confirming the match between the facial image from the document and the individual?
   This must be retained alongside the relevant RtW DVSP verification output.

8. Have you checked the information provided by the RtW DVSP and satisfied yourself that the individual has the right to work in the UK and is permitted to undertake the work in question?

Any restrictions or conditions on the individual's right to work must be identified and complied with.

3) 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. **See Appendix B for more information**

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.

eVisas and Biometric Residence Permits

Individuals who hold an eVisa must use the Home Office online right to work checking service to demonstrate their right to work in the UK.

A physical Biometric Residence Permit (BRP), including an expired BRP, must not be accepted as evidence of right to work. Where an individual has an eVisa, DSG must obtain and verify the individual's right to work using the Home Office online service and the share code provided by the individual.

DSG must check the online result and confirm that the individual is permitted to undertake the work in question and comply with any restrictions stated in the result.

Client and Site-Specific Requirements

Clients may require additional right to work, identity, eligibility, security or site-access checks as part of their own legal, contractual, site security or compliance requirements.

Where such checks are required by a client, DSG will cooperate with the client and provide the information or evidence reasonably required, subject to applicable data protection requirements

and DSG's contractual obligations.

Any additional client checks are supplementary to DSG's own right to work checking responsibilities and do not replace the prescribed right to work checks that DSG is required to complete.

Where contractual arrangements with a client or other third party place additional right to work obligations on DSG, these requirements will be reflected in the relevant contractual arrangements and followed alongside this policy. All DSG employees and other workers must also satisfy any client-specific requirements.

Time Limited Right to work checks

Where a right to work check confirms that an individual's permission to work is time limited, the expiry date and any applicable work restrictions will be recorded and tracked through the Company's systems.

The HR team will monitor time-limited right to work permissions and complete the appropriate follow-up check before the existing statutory excuse expires.

Where a follow-up check confirms that the individual continues to have the right to work, the updated evidence will be recorded and retained in accordance with this policy.

Where an individual has an outstanding immigration application, appeal or administrative review and the Home Office online service cannot confirm their right to work, the Employer Checking Service (ECS) will be used where appropriate to establish whether a Positive Verification Notice (PVN) can be obtained.

A Positive Verification Notice will be retained as evidence of the statutory excuse for the period specified by the Home Office.

Compliance and Failure to Provide Valid Right to Work

All employees and relevant individuals involved in the right to work checking process are expected to comply with this policy, the required right to work checking procedures and any associated client requirements.

Failure to comply with this policy or the required right to work checking procedures may result in disciplinary action.

Prospective employees must provide satisfactory evidence of their right to work in the UK before commencing employment. Failure to provide satisfactory evidence may result in an offer of employment being withdrawn.

Existing employees are required to maintain a valid right to work throughout their employment and, where applicable, provide further evidence when requested. Failure to provide satisfactory evidence of an ongoing right to work, including where a time-limited right to work has expired, may result in the matter being dealt with under the Company's disciplinary process and could ultimately result in termination of employment.

Escalations

Any queries about this process or documents that have been produced should be escalated to any of the following roles:

- Head of Commercial
- Operations Director
- HR



Russell Deards
General Counsel & Company Secretary
1 October 2026

Appendix A

Acceptable Documents

The documents listed in this appendix reflect the Home Office requirements applicable at the date of publication of this policy.

HR must always refer to the latest Home Office guidance and the current list of acceptable documents when completing a right to work check. Where there is any difference between this appendix and the current Home Office requirements, the current Home Office requirements will apply.

Individuals who demonstrate their right to work using a Home Office online right to work check must be checked through the prescribed online service and must not be required to provide physical immigration documents where the Home Office online service is the applicable method.

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

You can refer to the latest guidance from **Right to work Checks: An employers guidance** here

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 passport[1] (current or expired) showing the holder is a British citizen.
2. A passport or passport card[1] (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 UK[2].
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 question[5].
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.

Appendix B

Identity and Imposter Checks

This flowchart explains how to complete the required identity and imposter check where a right to work check has been conducted using the Home Office online right to work checking service or, where applicable, a registered Right to Work Digital Verification Service Provider (RtW DVSP). The person conducting the check must satisfy themselves that the individual presenting for work is the person to whom the right to work evidence relates.

You can refer to the latest guidance from **Right to work Checks: An employers guidance** here

