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Right to Work Compliance Checklist for Construction Businesses



Seven areas to help you move from **declaring** compliance to **demonstrating** it, across your workforce and your supply chain.

Ready isn't the same as provable

Since 1 October 2026, Right to Work responsibility has extended further into the construction supply chain. The question now is whether you have a robust process in place and, more importantly, whether you can prove that it works.

Many businesses know a check is required. Fewer can say exactly who carries it out, which route applies, what evidence is retained, and how the outcome is confirmed before someone is allowed on site.

Built by DataScope and PPAC, this checklist turns the seven areas from our webinar into practical questions you can work through with your compliance, HR, commercial, and site teams.

> "Compliance cannot be established through declarations alone; it must be supported by evidence and an operational process that can withstand scrutiny.



Dean Tuhey
Founder, PPAC
ppac.co.uk →

ppac

The seven areas at a glance

PAGES 2–4

01
Verify the person
The identity must belong to the worker.

02
Close the site gap
The verified worker is the one on site.

03
Know what's permitted
A valid status isn't permission for any work.

04
Manage status
Follow up before permissions expire.

05
Supply chain gaps
Agree who checks and who holds evidence.

06
Control onboarding
One route, one owner, before work starts.

07
Be enforcement-ready
Trained teams and evidence that still holds.

How to score
Tick only what you could evidence today.

AREA 1

Verify the person, not just the document

Having the correct document isn't enough. The identity has to belong to the person doing the work.

YOUR SCORE ___ / 5

- [ ] We treat **identity verification and Right to Work as separate checks**. Confirming who someone is doesn't confirm they can do the work.
- [ ] We check that **the person presenting for work is the person whose identity is being checked**, and we flag any discrepancies.
- [ ] We check that a worker's **personal details are consistent** across their recruitment records.
- [ ] Where we use the prescribed digital route, our provider is **certified and registered** for Right to Work checks on the government register.
- [ ] We understand **what our technology verifies, and what it doesn't**, and what evidence it returns after a check.

AREA 2

Close the gap between onboarding and site

The biggest emerging risk is the gap between the person registered to work and the person doing it.

YOUR SCORE ___ / 5

- [ ] We confirm that **the verified worker is the person on site**, and that the person who completes onboarding is the one who does the work.
- [ ] We check that no one is **using another person's verified account** or working under another person's identity.
- [ ] If a worker is **substituted**, the new person is checked before they start.
- [ ] Site access is granted on a **verified outcome**, never on an induction, an access card, a QR code, or an "active" status alone.
- [ ] Site teams know **what each status means** and what to do when information is incomplete or inconsistent.

AREA 3

Understand what a check actually permits

A valid immigration status doesn't automatically mean someone can do every type of work.

YOUR SCORE ___ / 5

- [ ] We understand **what a positive check actually permits**, not just that a check was passed.
- [ ] We confirm each worker is **eligible to undertake the specific work** proposed.
- [ ] We check for **limits on working hours** and **restrictions on self-employment**.
- [ ] We check for **employment conditions attached to particular visa categories**, including student visa working restrictions.
- [ ] We never assume a **valid share code** means unrestricted permission to work.

AREA 4

Manage permissions over time

The initial check is only one part of ongoing compliance.

YOUR SCORE ___ / 5

- [ ] We **diarise follow-up checks** and complete them before permissions expire.
- [ ] Once a permission expires, **no one continues working** until their updated position has been confirmed.
- [ ] Status changes are **passed to the relevant parties**.
- [ ] We have a **clear process** for when a worker changes employer, moves between subcontractors, or is supplied to another project.
- [ ] We've **reviewed our existing workers' records** against the rules in place at the time of their original check, and logged any gaps.

AREA 5

Close accountability gaps in the supply chain

Engaging an agency or subcontractor doesn't transfer all of your compliance responsibility.

YOUR SCORE ___ / 5

- [ ] We've **mapped every working arrangement** that brings people onto our sites, looking past whether someone is self-employed or CIS-registered to the actual working arrangement.
- [ ] We know **which business actually engages and pays** each worker, not just which subcontractor they arrive with.
- [ ] It's **agreed in writing** who completes the checks and who holds the evidence, and our contracts reflect it.
- [ ] **Completed PQQ declarations are backed by evidence** and sample audits, not accepted at face value.
- [ ] We apply **extra due diligence** to newly formed or frequently changing businesses, long supply chains, and inconsistent paperwork.

AREA 6

Make onboarding a controlled process

For many organisations, compliance has been an administrative exercise rather than a controlled business process.

YOUR SCORE ___ / 5

- [ ] Every worker follows **one defined process**: identity check, Right to Work check, evidence retained, approval, then site access.
- [ ] Every step of the process has **clear ownership** and doesn't rely on individual recruiters.
- [ ] Checks are completed **before work starts**, at procurement and onboarding, not at the site gate.
- [ ] For every worker, we can **retrieve the evidence**, see who completed the check, and demonstrate the outcome.
- [ ] Our platform **highlights incomplete checks**, and is supported by training and periodic assurance checks.

AREA 7

Be ready for rising enforcement

Illegal working visits rose 31% in the first half of 2026, and smaller firms are the most exposed.*

YOUR SCORE ___ / 5

- [ ] Everyone involved in recruitment is **trained** and understands the relevant **immigration restrictions**.
- [ ] Our teams can **recognise the warning signs** of potential illegal working.
- [ ] We **don't rely on third parties** for compliance without checking what they've done.
- [ ] We **don't assume historical checks still protect us**, and confirm older records remain valid.
- [ ] We have a clear route for **seeking compliance or legal advice** where a worker's position is uncertain.

*Home Office, Illegal working and enforcement activity to the end of June 2026, comparing January to June 2026 with the same period in 2025.

Your score summary

AREA 1	AREA 2	AREA 3	AREA 4	AREA 5	AREA 6	AREA 7	TOTAL
___ / 5	___ / 5	___ / 5	___ / 5	___ / 5	___ / 5	___ / 5	___ / 35

5 OUT OF 5

Strong

You can evidence every point. Keep reviewing it as your workforce changes.

3–4 OUT OF 5

Gaps to close

Some controls need evidence behind them. Plan how you'll close the gaps.

0–2 OUT OF 5

Priority area

Start here. These are the gaps most likely to catch your business out.

Remember: only tick a statement if you could evidence it today, if asked by a client, an auditor, or the Home Office. Start with your lowest-scoring area, and work through it with your compliance, HR, commercial, and site teams.

Four assumptions to avoid

A completed PQQ ≠ verified compliance

Declared controls need evidence behind them.

An identity check ≠ a right to work

Who someone is isn't what they can do.

An "active" status ≠ a verified outcome

Know what each status really means.

Speed to mobilise ≠ a reason to skip

Approve only once checks are done.

HOW DATASCOPE CAN HELP

Make the right process the easy one

- ✓ One standard onboarding route for every worker
- ✓ Digital checks through two approved Right to Work partners
- ✓ Right to Work status assured at all times, with audit-ready evidence

Contact us to find out more

What to do now

Five next steps from the webinar

1. Map working arrangements
2. Close supply chain gaps
3. Check your provider
4. Manage status over time
5. Verify the person on site

This checklist is general guidance to support your own review. It isn't legal advice. Seek compliance or legal advice for your specific circumstances.