

R&M POLICY · PEOPLE AND ETHICS

Right to Work in the UK and Verification Policy

R&M Property Group Ltd

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Policy Statement

R&M Property Group Ltd is committed to operating lawfully and responsibly in all aspects of its business. We recognise our legal obligation to prevent illegal working and to verify that every individual who works for us, or on our behalf, has the legal right to work in the United Kingdom. This obligation extends to our directly employed workforce, to operatives supplied through external employment agencies, and to the workforce of subcontractors and supply chain partners engaged on our projects.

As a developer working within public sector frameworks - R&M delivers projects for local authorities, housing associations, NHS trusts, and other public bodies. These Client Organisations rightly expect that every individual working on their schemes is legally entitled to do so, and that robust verification procedures are in place throughout the supply chain. This policy sets out how R&M meets that expectation.

R&M has a zero-tolerance approach to illegal working. Any individual found to be working without a valid right to work will be removed from the project immediately, and any employer or agency responsible for placing that individual will be subject to contract review and potential termination of the commercial relationship.

2. Legal Framework

The principal legislation governing right to work checks in the United Kingdom is the Immigration, Asylum and Nationality Act 2006, as amended by the Immigration Act 2014 and the Immigration Act 2016. This legislation places a duty on every employer to verify that each employee has the right to work in the UK before the employment commences. Failure to comply carries significant penalties:

- **Civil penalties:** A civil penalty of up to sixty thousand pounds per illegal worker may be imposed on an employer who has not carried out the prescribed right to work checks. This penalty was increased from forty-five thousand pounds in February 2024 under the Immigration (Employment of Adults Subject to Immigration Control) (Maximum Penalty) (Amendment) Order 2024.
- **Criminal offences:** Under Section 21 of the Immigration, Asylum and Nationality Act 2006, an employer who knowingly employs a person who does not have the right to work in the UK commits a criminal offence punishable by up to five years' imprisonment and an unlimited fine.
- **Statutory excuse:** An employer who conducts the prescribed right to work checks correctly and in the prescribed manner obtains a statutory excuse against liability for a civil penalty. This means that even if a worker is subsequently found to be working illegally, the employer will not be penalised provided the checks were carried out properly and on time.

R&M also complies with the Equality Act 2010 in the conduct of right to work checks. Checks are carried out consistently for all individuals regardless of nationality, ethnicity, or appearance. R&M does not make assumptions about a person's right to work based on their name, accent, appearance, or country of origin. Selective or discriminatory checking is itself unlawful and will not be tolerated.

The Home Office publishes detailed guidance on conducting right to work checks, including the list of acceptable documents, the online checking service, and the Identity Document

Validation Technology (IDVT) route. R&M follows this guidance and ensures that its checking procedures reflect the most current version of the Home Office Code of Practice on Preventing Illegal Working.

3. Scope of This Policy

This policy applies to:

- All directors, employees, and workers directly engaged by R&M Property Group Ltd, whether on permanent, fixed-term, or casual contracts
- All operatives supplied to R&M through external employment agencies, labour providers, or recruitment businesses
- All subcontractors and their workforce engaged on R&M projects, whether appointed directly by R&M or through the wider supply chain
- All consultants, professional advisors, and self-employed individuals engaged to provide services on R&M's behalf where they are working on site or within R&M's premises

The policy covers initial right to work verification before any individual commences work, follow-up checks for individuals with time-limited permission to work, ongoing monitoring and audit across the supply chain, and the procedures for dealing with situations where right to work cannot be confirmed.

4. Directly Employed Workforce

4.1 Pre-Employment Checks

Every individual offered employment by R&M must provide evidence of their right to work in the United Kingdom before their first day of work. No individual may commence work until their right to work has been verified and recorded. This is a non-negotiable requirement - there are no exceptions, regardless of seniority, urgency, or the nature of the role.

The checking process follows the three-step procedure prescribed by the Home Office:

- **Step 1 - Obtain:** The individual presents their original right to work document or documents. R&M accepts documents from the Home Office lists of acceptable documents (List A and List B). Photocopies, scanned images, or photographs of documents are not acceptable - the original must be presented in person or, where the online checking service is used, via the share code route.
- **Step 2 - Check:** The person conducting the check examines the documents in the presence of the holder. They verify that the documents are genuine, that the photographs and dates of birth are consistent with the appearance of the holder, that the documents have not expired (unless they are acceptable as expired documents under the Home Office guidance), that the documents allow the individual to do the type of work being offered, and that there are no discrepancies or signs of tampering.
- **Step 3 - Copy and record:** A clear, legible copy is taken of the relevant pages of the document - for a passport, the front cover and the page containing the photograph, personal details, nationality, date of birth, signature, date of expiry, and any endorsements. The copy is dated with the date the check was made and stored securely in the individual's personnel file. The date of the check, the documents presented, and the name of the person who conducted the check are recorded in R&M's Right to Work Register.

4.2 Acceptable Documents

The Home Office maintains two lists of acceptable documents:

- **List A - Permanent right to work:** Documents from List A establish a permanent, ongoing right to work and provide a continuous statutory excuse. The most common List A document is a current or expired UK or Irish passport. A full UK birth or adoption certificate combined with an official document showing the holder's permanent National Insurance number is also acceptable. Individuals who are British or Irish citizens have an unrestricted, lifelong right to work in the UK.
- **List B - Time-limited right to work:** Documents from List B establish a right to work that is limited in duration, typically by the terms of a visa or immigration permission. These include biometric residence permits, frontier worker permits, and documents issued under the EU Settlement Scheme (pre-settled status). List B documents provide a statutory excuse only until the permission expires, at which point a follow-up check must be conducted.

4.3 Online Right to Work Checks

Where an individual holds a biometric residence permit, biometric residence card, frontier worker permit, or status under the EU Settlement Scheme or points-based immigration system, R&M may use the Home Office online right to work checking service as an alternative to manual document checks. The individual provides a share code (generated via the Home Office "prove your right to work" service) and their date of birth. R&M enters these into the employer checking service, views the result, and saves or prints the online profile page as the record of the check. The online check provides the same statutory excuse as a manual document check.

R&M also accepts checks conducted through certified Identity Document Validation Technology (IDVT) service providers, where the individual holds a valid British or Irish passport. IDVT checks are conducted remotely and provide a statutory excuse in the same way as a manual check, provided the IDVT service provider is on the Home Office list of certified providers.

4.4 Follow-Up Checks

Where an individual has time-limited permission to work (evidenced by a List B document), R&M conducts a follow-up check before the permission expires. The expiry date is recorded in the Right to Work Register at the time of the initial check, and a diary reminder is set for twenty-eight days before the expiry date. The follow-up check follows the same three-step procedure as the initial check.

If the individual's permission has been extended or they have made an in-time application to the Home Office that has not yet been decided, R&M uses the Home Office Employer Checking Service to verify that the individual retains a right to work pending the outcome. The Employer Checking Service issues a Positive Verification Notice which provides a statutory excuse for six months, at which point a further check must be made.

If the follow-up check reveals that the individual's permission has expired and has not been extended or renewed, the individual must cease work immediately. R&M will not permit any individual to continue working once their right to work can no longer be verified.

5. Site Induction - Right to Work Verification Procedure

Right to work verification is embedded in R&M's standard site induction process. Every individual - whether directly employed, agency-supplied, or working for a subcontractor - must complete a site induction before commencing work on any R&M project. The right to work element of the induction operates as follows:

- **Before induction:** The individual is notified in advance (via the induction booking confirmation) that they must bring original right to work documents to the induction session. The notification specifies that photocopies, photographs, or digital images are not acceptable and that no one will be permitted to start work without presenting valid documents.
- **At induction - document presentation:** The operative presents their original documents to the site manager, project administrator, or designated induction officer. The checker examines the documents following the three-step process described in Section 4.1.
- **At induction - recording:** A dated copy of the documents is taken and filed. The operative's details are entered into the site Right to Work Register, recording their name, date of birth, document type and reference number, expiry date (if applicable), the date the check was conducted, and the name of the person who carried out the check.
- **At induction - CSCS/competence cards:** R&M also checks the operative's CSCS card or equivalent competence card at induction. While a CSCS card is not a right to work document, it provides an additional layer of identity verification and confirms that the holder has the qualifications and training appropriate to their role on site.
- **No documents, no start:** If an individual cannot present valid right to work documents at induction, they are not permitted to commence work. There are no exceptions to this rule. The individual may rebook the induction once they have obtained the necessary documents.

6. Agency-Supplied Workers

Where R&M engages operatives through external employment agencies, labour providers, or recruitment businesses, the agency is the employer for the purposes of the Immigration, Asylum and Nationality Act 2006 and carries the primary legal obligation to conduct right to work checks. However, R&M does not rely solely on the agency's compliance. R&M applies the following additional safeguards:

- **Contractual requirements:** R&M's standard agency terms require the agency to confirm in writing that right to work checks have been completed for every operative before they are supplied to R&M. The agency must certify that the checks were conducted in accordance with the Home Office Code of Practice and that the statutory excuse has been obtained. These terms also require the agency to conduct timely follow-up checks for any operative with time-limited permission and to notify R&M immediately if any operative's right to work cannot be confirmed.
- **Agency compliance declaration:** Before an agency is added to R&M's approved supplier list, the agency must provide a signed declaration confirming that it has robust right to work checking procedures in place, that its staff are trained to conduct checks correctly, and that it maintains auditable records. R&M reviews the agency's right to work procedures as part of the supplier onboarding assessment.

- **Site induction verification:** Every agency operative must attend R&M's standard site induction and present their original right to work documents. This provides an independent verification that complements the agency's own checks. If there is any discrepancy between the documents presented at induction and the agency's confirmation, work is suspended until the matter is resolved.
- **Audit rights:** R&M reserves the right to audit an agency's right to work records at any time. Failure to provide satisfactory evidence of compliance may result in suspension or termination of the agency relationship.

R&M only uses reputable employment agencies that are registered with the Gangmasters and Labour Abuse Authority (GLAA) where required by law. R&M does not engage agencies that cannot demonstrate compliant right to work procedures.

7. Supply Chain - Subcontractors and Their Workforce

R&M's supply chain includes a wide range of subcontractors, from specialist trade contractors to professional service providers. Each subcontractor is the employer of its own workforce and carries the primary obligation to conduct right to work checks for its employees and operatives. R&M ensures compliance across the supply chain through the following measures:

- **Pre-qualification requirement:** As part of R&M's subcontractor pre-qualification and onboarding process, every subcontractor must confirm that it has a documented right to work checking procedure, that it conducts checks for all employees in accordance with the Home Office Code of Practice, and that it maintains records of all checks. This is assessed alongside financial due diligence, health and safety competence, and insurance verification.
- **Subcontract conditions:** R&M's standard subcontract terms include a clause requiring the subcontractor to comply with all applicable immigration legislation, to verify the right to work of every operative before they commence work on an R&M project, and to provide evidence of compliance upon request. The subcontractor is required to flow these obligations down to any further subcontractors in the chain.
- **Site induction:** Every subcontractor operative must attend R&M's site induction and present their original right to work documents, regardless of whether their employer has already conducted checks. This provides a consistent, project-level verification and ensures that no individual commences work on site without their right to work being independently confirmed by R&M's site team.
- **Ongoing monitoring:** R&M monitors right to work compliance throughout the life of the project. The site manager reviews the Right to Work Register periodically to identify any operatives whose time-limited permission is due to expire. Where a follow-up check is required, the subcontractor is notified and must provide updated evidence. Spot checks may be conducted during routine site walks.
- **Non-compliance:** If R&M identifies an operative on site who cannot provide satisfactory evidence of their right to work, the operative is removed from site immediately. The subcontractor is notified and required to investigate. Repeated or serious non-compliance may result in the subcontractor being removed from R&M's approved supplier list and reported to the relevant authorities.

8. Record Keeping and Data Protection

R&M maintains comprehensive records of all right to work checks. These records are essential both for demonstrating compliance and for establishing the statutory excuse in the event that an individual is subsequently found to be working illegally.

The following records are maintained:

- **Right to Work Register:** A central register recording the name of every individual whose right to work has been verified, their date of birth, the type and reference number of the documents presented, the expiry date of any time-limited permission, the date the check was conducted, and the name and role of the person who carried out the check. The register is maintained by the site manager for each project and consolidated centrally.
- **Document copies:** Dated copies of the documents presented, stored in the individual's personnel file (for direct employees) or in the project right to work file (for agency workers and subcontractor operatives).
- **Agency declarations:** Copies of agency compliance declarations and any correspondence regarding right to work verification for agency-supplied operatives.
- **Follow-up check records:** Records of all follow-up checks, including Positive Verification Notices from the Home Office Employer Checking Service.

All right to work records are retained for the duration of the individual's engagement and for a minimum of two years after the engagement ends. This is the period during which the Home Office may conduct an investigation and during which the statutory excuse remains relevant.

Right to work records contain personal data and are processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Access to records is restricted to authorised personnel. Document copies are stored securely, whether in physical files or on R&M's IT systems. Records are not retained beyond the retention period unless there is a specific lawful basis for doing so.

9. Responsibilities

- **Thom McKenna (Director):** Overall responsibility for ensuring that R&M complies with all right to work legislation and that this policy is implemented effectively across the business. Authorises any exceptions or escalations (though exceptions to the verification requirement itself are not permitted).
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Responsible for maintaining the template checking procedures, training site staff on right to work verification, monitoring compliance across projects, and advising on complex cases such as pending Home Office applications or disputed documents.
- **Site Managers / Project Administrators:** Responsible for conducting right to work checks at site induction, maintaining the project Right to Work Register, taking and filing document copies, diarising follow-up checks, and refusing entry to any individual who cannot present valid documents.
- **Louis Howard (Procurement Manager, Enabl):** Responsible for ensuring that right to work compliance requirements are included in all subcontract and agency terms, that supplier onboarding includes assessment of the supplier's right to work procedures, and that non-compliance is escalated appropriately.

- **Ian Skates (Financial Director):** Works alongside PAYE administration to ensure that UTR and CIS verification (conducted under R&M's Financial Due Diligence Policy) complements the right to work verification process. Any discrepancies identified through payroll or CIS checks are reported to the Compliance Officer.

10. Training

All R&M personnel who are responsible for conducting right to work checks receive training on the correct procedure, including how to examine documents, what to look for in terms of signs of fraud or tampering, how to use the Home Office online checking service, and how to record checks correctly. Training is provided at induction and refreshed annually or whenever the Home Office updates its guidance or acceptable document lists.

Training covers the importance of conducting checks consistently and without discrimination, the consequences of failing to carry out checks (both for the company and for the individual conducting the check), and the procedure for dealing with situations where documents cannot be verified or where there are concerns about authenticity. Training records are maintained by Phillip Hollingworth.

11. Reporting Concerns

Any R&M employee or associate who suspects that an individual is working without a valid right to work, or who has concerns about the authenticity of documents presented, must report the matter immediately to the site manager and the Compliance Officer. The matter will be investigated promptly and confidentially.

R&M will not penalise any employee who raises a genuine concern about right to work compliance in good faith. Equally, R&M treats any attempt to use false or fraudulently obtained documents as a serious matter, which may be reported to the Home Office and the police.

If R&M identifies a case of illegal working, the company will cooperate fully with the Home Office and any other relevant authority. R&M will also notify the relevant Client Organisation and the Framework Manager where the matter relates to a framework project, in accordance with the transparency and reporting obligations that apply under public sector procurement frameworks.

12. Relationship to Modern Slavery and Ethical Employment

Right to work verification is closely connected to R&M's commitment to preventing modern slavery and labour exploitation. Workers without a legal right to work are among the most vulnerable to exploitation, forced labour, and trafficking. By maintaining rigorous right to work checks throughout our workforce and supply chain, R&M helps to identify potential victims and to ensure that no one working on our projects is doing so under duress or coercion.

This policy operates alongside R&M's Modern Slavery Statement, Social Value Policy, and Supply Chain Management procedures. Where a right to work check reveals indicators of potential exploitation - such as documents being held by a third party, workers appearing to be under the control of another individual, or operatives who appear not to understand the terms of their engagement - the matter is escalated immediately to the Compliance Officer and,

where appropriate, reported to the Gangmasters and Labour Abuse Authority or the Modern Slavery Helpline.

13. Framework and Client Organisation Requirements

Working within public sector procurement frameworks requires R&M to demonstrate that it has effective procedures for verifying the right to work of its entire workforce, including agency workers and the supply chain. Client Organisations may request evidence of R&M's right to work checking procedures as part of the call-off process, during project mobilisation, or at any time during the life of a project.

R&M is able to provide Client Organisations with:

- A copy of this policy
- The project Right to Work Register (redacted as necessary to comply with data protection requirements)
- Confirmation that all operatives on site have been verified through the induction process
- Evidence of agency and subcontractor contractual obligations regarding right to work compliance
- Training records demonstrating that R&M personnel are competent to conduct right to work checks

R&M welcomes audits and inspections by Client Organisations and the Framework Manager in relation to right to work compliance, and will cooperate fully with any such exercise.

14. Policy Review

This policy is reviewed annually by the Compliance Officer and approved by the Director. The next scheduled review date is June 2027. The policy will also be reviewed following any right to work incident or investigation, any change in immigration legislation or Home Office guidance, any significant change in R&M's workforce model or supply chain structure, or upon feedback from Client Organisations or the Framework Manager.

Approved and Signed

Name: Thom McKenna

Position: Director, R&M Property Group Ltd

Date: 24 June 2026

This policy will be published on the R&M Property Group Ltd website and available to all employees, supply chain partners, and framework clients upon request.

Please print name, sign and date below your agreement to this policy -