

# Immigration Compliance

Risk and exposure audit  
2025

## Introduction

Firms licenced by the Home Office to sponsor workers are subject to strict ongoing compliance obligations, also known as "Sponsorship Duties". Home Office enforce these Sponsorship Duties by conducting both unannounced and announced compliance visits, where officers will seek to interview the "Authorising Officer".

As a licenced sponsor, your Firm agreed to provide the Home Office access for an unannounced visit when you signed the application. This includes digital compliance inspection, where the Home Office can conduct a remote compliance audit.

An unsatisfactory compliance visit can result in the revocation or suspension of your Firm's sponsorship licence, leading to the visas of sponsored workers being cancelled and the inability to sponsor workers. Not conducting Right to Work Checks in a specified manner can lead to Civil Penalties, and in some cases, criminal convictions.

If your Firm employs non-UK nationals and sponsors workers, your first step must be to ensure ongoing compliance with Sponsorship Duties.

## Prevention of illegal working

- A review of right-to-work check policies including records held on file.
- A review of mechanisms to prevent illegal working.

## Record keeping

- A review of files and records of sponsored employees to check whether the Firm is compliant with its Record Keeping duties and retains Specified documents and information on file for its sponsored workers.

## Monitoring and reporting duties

- A review of files and records to check whether Triggering Events have been and are being reported to the Home Office within the specified timeframes.
- A review of Key Personnel's awareness to confirm whether they are aware of the events that can trigger Reporting Duties.
- A review of HR systems of how sponsored workers are monitored.

## Key Personnel

- A review of whether the Key Personnel – Authorising Officer and Level 1 User – are compliant and aware of their ongoing duties.
- A review of Key Personnel's awareness to confirm whether they are aware of what constitutes breach of Sponsorship Duties.

## General compliance and HR health check

- An overall health check of the Sponsorship Licence and compliance mechanisms.
- To be followed by Action Points and Recommendations.

## Training and Development

- Action Points and Recommendations following a review.
- A training session or a document outlining top tips for Key Personnel (Authorising Officer and, Level 1 Users) and HR / Recruitment Business partners on Sponsorship Duties.

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