

International Sponsorship Compliance: Inspection Preparation Toolkit

A Practical Operational Toolkit for UK Social Care Leaders, covering everything registered managers and compliance leads need to know to maintain sponsor licence integrity, protect their workforce, to strengthen your readiness and reduce risk ahead of potential inspection.



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1. Compliance Failure Has Immediate Consequences

The regulatory environment for international recruitment in social care has tightened significantly. UK Visas and Immigration (UKVI) now cross-checks payroll data, reporting logs and sponsor records automatically. Discrepancies can trigger enforcement action before a formal inspection ever takes place. Registered managers must understand that compliance failure is not an abstract risk, it can result in immediate, concrete harm to your organisation and to the workers you sponsor.

What Must Always Be True

- Salary matches all recruitment commitments made to sponsored workers
- Workers earn the required salary thresholds consistently, every pay period
- Roles and work locations align exactly with records held by UKVI
- All changes to roles, hours, or salary are reported promptly and accurately

How Monitoring Now Works

- Payroll data is cross-checked against sponsor declarations
- Discrepancies are flagged automatically by UKVI systems
- Enforcement action can be initiated without a full on-site inspection
- Digital audit trails are reviewed routinely, not only on request

Salary Below Threshold

Pay drops below required level, a critical high-risk failure triggering immediate review

Reduced Hours Unreviewed

Hours cut without salary reassessment or formal reporting to UKVI

Late or Missing Reporting

Failure to notify UKVI of changes within required timeframes

Incomplete Records

Worker files missing key documents, creating gaps in the audit trail

-  **If compliance fails, your workforce is at risk.** Sponsor licence suspension or revocation means sponsored workers lose their right to remain and work in the UK. The human consequences are as serious as the regulatory ones.

2. What Inspectors Actually Look For

When UKVI compliance officers assess a sponsor, they are not simply reviewing paperwork in isolation. They evaluate whether your organisation's systems, practices, and culture genuinely support compliant employment of sponsored workers. Understanding their focus areas allows you to prepare comprehensively not just for the documents they request, but for the evidence of real-world delivery they expect to see.



Documentation

Inspectors verify that all worker files are complete, current, and readily accessible. Missing or outdated documents are treated as non-compliance, regardless of intent.



Salary & Payroll

Pay records are scrutinised to confirm workers have received the correct salary in every pay period. Underpayment, even temporary, is a serious breach.



Job Role Accuracy

The worker's actual duties must match the role specified on their Certificate of Sponsorship. Informal role changes without reporting are a common enforcement trigger.



Work Location

Workers must be based at the location recorded with UKVI. Operating across multiple sites without updating records is flagged routinely.



Attendance Records

Inspectors cross-reference attendance logs with payroll. Unexplained absences or inconsistencies between records raise immediate concerns.



Safeguarding

Evidence that sponsored workers are protected from exploitation and that your organisation has robust safeguarding procedures in place is assessed in every inspection.

 **Inspectors assess both systems AND real-world delivery.** Having a policy is not enough, you must demonstrate it is applied consistently and that your team can evidence this under questioning.

3. Governance & Accountability

Robust governance is the foundation of sustained compliance. UKVI expects that responsibility for sponsor licence management is clearly assigned at leadership level, not left to chance or delegated informally. Inspectors will ask who owns compliance and they expect a clear, confident answer. Organisations with ambiguous accountability structures are at significantly higher risk of systemic failures going undetected until enforcement action is already under way.

Leadership

Registered Manager

- Ultimate accountability for sponsor licence compliance
- Oversight of all governance structures and reporting
- Escalation point for high-risk issues or breaches
- Accountable to CQC and UKVI simultaneously

Operations

HR & Compliance Lead

- Day-to-day management of recruitment processes
- Maintaining worker files and reporting logs
- Ensuring CoS accuracy and timely notifications
- Coordinating internal audits and reviews

Control

Finance & Safeguarding

- Payroll accuracy and threshold monitoring
- Worker protection and exploitation prevention
- Cross-checking salary records against declarations
- Flagging discrepancies before reporting deadlines

→ Roles Clearly Assigned

Every compliance function has a named owner – not a team or a department, but an individual who is accountable and can be questioned by inspectors.

→ Compliance Owned at Leadership Level

The Registered Manager is actively involved in compliance governance, not merely informed of outcomes after the fact.

→ Internal Reviews Scheduled

Compliance reviews are diarised, documented, and actioned – not triggered only when problems arise or inspections are announced.

- ❏ **Compliance is now a core operational risk.** Failures are detected automatically, not only during inspection. Every provider sponsoring international workers must treat compliance as continuous, embedded practice.

4. Core Compliance Duties

Every sponsor has three interconnected duties that together form the bedrock of compliant international recruitment. These are not optional enhancements, they are legal obligations under the sponsor licence framework. Understanding what each duty requires in practice, and building systems to discharge them consistently, is what separates organisations that pass inspections from those that face enforcement action.

Record Keeping

Maintain complete, accurate and accessible worker files for every sponsored employee. This includes:

- Full employment contracts and any amendments
- Verified identity documents and passport copies
- Payroll records for every pay period
- Certificate of Sponsorship details and right to work evidence
- Recruitment documentation and agency correspondence

Monitoring

Active, ongoing oversight of employment conditions to detect and address issues before they become reportable breaches:

- Regular salary checks against CoS thresholds
- Role and duty monitoring to ensure CoS accuracy
- Hours tracking with payroll cross-referencing
- Attendance record maintenance and review

Reporting

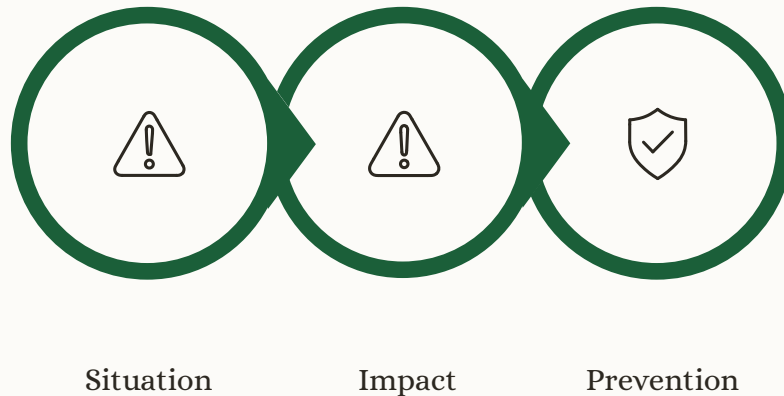
- Any change to a worker's role, salary, or hours
- Significant or unexplained absences
- Worker leaving employment or changing visa status
- Any concerns about worker welfare or exploitation



⚠ Most enforcement action stems from failure to report changes on time. Reporting is not simply an administrative task, it is a legal duty. Late notification is treated as seriously as the underlying change itself.

5. Scenario: Salary Compliance Failure

One of the most common and most serious, compliance failures occurs when a worker's hours are reduced without a corresponding review of their salary against the required threshold. This often happens during periods of operational pressure, when informal rota changes are made without triggering the formal HR and finance review processes that compliance requires. Understanding how this failure unfolds, and what it costs, is essential for every manager.



This scenario illustrates a pattern that inspectors encounter repeatedly: not a deliberate breach, but a failure of systems and communication between HR and finance teams. The pathway from informal rota adjustment to formal enforcement action can be surprisingly short once automated UKVI monitoring flags the salary discrepancy.

Impact on the Organisation

- Sponsor licence placed under review or suspended
- Workforce instability — sponsored workers face uncertainty
- Regulatory scrutiny from CQC as well as UKVI
- Reputational damage and recruitment disruption

Prevention Measures

- Monthly payroll checks against CoS salary thresholds
- Formal alignment between HR and finance on any hours changes
- Automated escalation triggers when pay approaches threshold
- Supervisory sign-off required before any rota amendments affecting sponsored workers

6. UK-based care workers: transitional route & sponsor checks

- ❑ From **22 July 2025**, care workers and senior care workers under occupation codes **6135** and **6136** can no longer be sponsored from outside the UK. For these roles, sponsorship is now limited to workers who are **already in the UK** and applying for permission to stay, subject to specific conditions.

Who can still be sponsored?

A worker must **already be in the UK** and must meet **one** of these routes:

Route 1 - 3-month prior work with you

They have been **legally working for your organisation** as a care worker or senior care worker for **at least 3 months** before you assign the CoS.

This in-country switching option is a **transitional provision** and applications under this route must be made **no later than 22 July 2028**. You must keep evidence such as payslips or a contract showing the 3-month work history.

Route 2 - Already sponsored in care

They were **last granted permission as a Skilled Worker** in a care worker or senior care worker role, and have had **continuous permission** in one of those roles since then. This includes people changing employer, as long as the continuity requirement is met.

Important rule changes providers should know

The previous requirement to try to recruit from the **displaced worker pool** was removed, because only workers exempt from that requirement remain eligible in these care roles.

Existing transitional arrangements for current Skilled Worker holders in below-RQF-6 occupations are being kept under review, and providers should continue checking official guidance because this area is changing.



7. The 10 Documents Inspectors Will Request

Whether for a scheduled for a compliance request, visit or an unannounced inspection, you may be requested for a specific set of documents for each sponsored worker. The speed and completeness with which you produce these documents is itself an indicator of your compliance culture. Delays, gaps, or inconsistencies are not treated charitably. Preparation means having every item below organised, current, and instantly accessible for every sponsored employee on your payroll.

1	Passport & Identity Documents Current passport and any previous travel documents relevant to the worker's immigration history. Must be verified copies held on file.
2	Employment Contract Signed contract including salary, role, hours, and location. Any amendments must be documented with the original contract retained.
3	Certificate of Sponsorship Details Full CoS record including the reference number, assigned role, salary stated, and any subsequent changes notified to UKVI.
4	Payroll Records Complete payroll history for the duration of employment, demonstrating consistent payment at or above the required threshold in every pay period.
5	Job Description Accurate, current job description that corresponds to the CoS role. Must reflect actual duties not a generic template.
6	Attendance Records Comprehensive attendance logs that can be cross-referenced with payroll and rota records. Unexplained absences must be documented.

Recruitment Records

Documentation of the recruitment process including agency correspondence, interview records, and any pre-employment checks undertaken.

Reporting Logs

A complete record of every notification made to UKVI, including dates, the nature of the change reported, and confirmation of submission.

Right to Work Evidence

Verified right to work checks for every sponsored worker, conducted at the point of hire and reviewed at each visa renewal or status change.

- ❑ **If you cannot produce any of these documents quickly, it is treated as non-compliant.** A missing document is not simply a gap it is evidence of a system failure that inspectors will pursue further.



8. What To Do If Contacted by Authorities

Receiving contact from UKVI, whether a request for information, a compliance visit notice, or any form of enquiry, must be treated as an immediate priority, not a routine administrative matter. Your response in the first 24 to 48 hours significantly influences how the situation develops. Organisations that respond promptly, transparently, and with well-organised evidence consistently achieve better outcomes than those that delay, are disorganised, or appear unprepared.



Step 1 Treat as Urgent

Immediately escalate to the Registered Manager and designated compliance lead. Do not treat any UKVI contact as routine. Assess the nature of the contact and assign a named response owner within the hour.



Step 2 Launch Internal Audit Within 24 Hours

Begin a comprehensive internal review covering all sponsored workers. Do not wait for the inspection date, early identification of discrepancies gives you the opportunity to address them proactively.



Step 3 Review Payroll, CoS & Reporting Logs

Cross-check every sponsored worker's payroll records against their CoS salary, and verify that all changes have been reported correctly and on time. Identify any gaps or inconsistencies immediately.



Step 4 Identify & Document Discrepancies

Record every discrepancy found, however minor. Demonstrating that you have identified and addressed issues before inspection significantly reduces the severity of regulatory findings.



Step 5 Seek Professional Advice If Needed

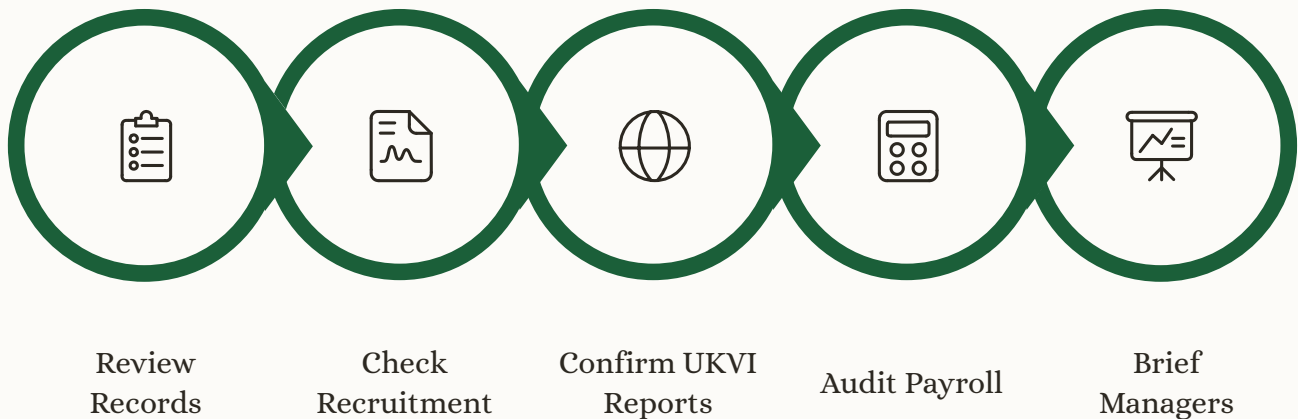
If discrepancies are identified, or if the nature of the UKVI contact is unclear, seek specialist immigration or legal advice immediately. Early professional guidance can prevent escalation and inform your response strategy.



Early, organised action can significantly reduce escalation risk. UKVI distinguishes between organisations that have robust systems and encounter isolated issues, and those whose failures are systemic. Your response demonstrates which category you fall into.

9. Preparing for Inspection

Inspection readiness is not a state you achieve once, it is a continuous operational posture. The most effective preparation is not a frantic review conducted when an inspection is announced, but a well-maintained system of records, monitoring, and governance that means you are ready at any time. That said, when an inspection is confirmed or anticipated, a structured preparation process ensures nothing is overlooked and your team is confident and well-briefed.



Pro Tip: Create a Central Compliance Folder

Maintain a dedicated, organised compliance folder (physical or digital) for every sponsored worker. This folder should contain all ten documents inspectors request, indexed and current. When inspectors arrive, the ability to produce a complete, organised file for every worker immediately signals a culture of compliance. It reduces stress, reduces inspection time, and reduces risk.

Manager Preparation Essentials

- Brief all managers on the inspection process and what to expect
- Ensure managers know their own compliance responsibilities and can articulate them
- Conduct a mock Q&A so managers are confident responding to inspector questions
- Confirm who is the designated point of contact during the inspection
- Prepare a clear, concise summary of your governance structure to present if asked
- Review any previous compliance issues and document the remedial action taken

10. Practical Steps for Providers

Beyond meeting minimum compliance requirements, leading providers are embedding compliance into their operational culture, making it a continuous, structured practice rather than a reactive response to risk. The organisations that consistently perform well in inspections are those that treat compliance as a core management discipline, invest in training and systems, and ensure that every function, HR, finance, operations, and leadership, shares accountability for getting it right.



Supervision Integration

Incorporate compliance checks into regular staff supervision. Reviewing a worker's file, salary, and role accuracy becomes a standard agenda item, not a special exercise.



Regular File Audits

Conduct scheduled audits of all worker files and records at minimum quarterly. Identify gaps before they become enforcement triggers.



Sponsor Licence Procedures

Review sponsor licence procedures internally at least annually. Ensure all nominated persons and key contacts are current and that internal processes reflect latest UKVI guidance.



Compliance Training

Invest in sponsor licence and immigration compliance training for HR, finance, and management teams. Knowledge gaps are a significant risk factor and are preventable.

→ Align HR, Finance & Operations

Establish regular cross-functional meetings to review sponsored worker data. Salary changes, rota adjustments, and reporting obligations must flow seamlessly between teams — not sit in silos.

→ Escalate Issues Early

Create a culture where staff feel confident flagging potential compliance issues without delay. Early escalation allows problems to be addressed before they become reportable breaches or enforcement matters.

→ Consider Professional Licence Management

For organisations sponsoring significant numbers of international workers, specialist licence management services provide an additional layer of assurance and expertise that many in-house teams cannot replicate.

→ Seek Expert Advice When Uncertain

If any aspect of your sponsor obligations is unclear, seek specialist legal or immigration advice promptly. Acting on uncertainty without guidance is one of the most avoidable causes of compliance failure.

11. Sponsorship Is a Legal Responsibility, Not a Commercial Opportunity

Protecting International Sponsored Workers from Exploitation in Adult Social Care

Holding a sponsor licence places a legal duty on organisations to protect and support international sponsored care workers throughout their employment.

It is NOT an opportunity to generate income through sponsorship or to exploit vulnerable workers. Sponsorship must never be used as a means of coercion or control, create financial advantage, restrict a worker's rights or exploit their immigration status.

The UK Government has made it clear that employers holding a sponsor licence have significant legal and ethical responsibilities towards sponsored workers.

Every provider has a responsibility to uphold ethical employment practices, comply with legal requirements and foster an inclusive workplace. A worker's immigration status should never result in them being treated less favourably, subjected to additional financial burdens, or placed at a disadvantage compared to their UK-based colleagues.

Recent government enforcement has highlighted increasing concerns regarding a number of providers who have exploited overseas workers by charging unlawful fees, making illegal deductions from wages and threatening workers' immigration status. These practices undermine public confidence, damage the reputation of the sector and may result in serious regulatory and legal consequences for the employer.

ILLEGAL CHARGES

Examples of unlawful or prohibited practices include:

- Charging workers to issue or renew sponsorship.
- Charging workers to extend their Skilled Worker visa where those costs must legally be met by the employer.
- Charging disguised "administration fees" that are sponsorship costs in another form.
- Requiring workers to repay immigration costs through unlawful wage deductions.
- Demanding payment in exchange for continuing sponsorship or employment.

The Government considers these practices to be exploitative. Workers have successfully recovered unlawful payments through legal action, and enforcement activity continues across the care sector.

 Ethical sponsorship is not just a legal requirement, it is a professional and moral obligation. Providers who uphold these standards protect their workers, their licence, and the reputation of the sector.

12. Legal Consequences & Employer Obligations

What Happens When Providers Break the Rules

Providers found to have exploited sponsored workers face serious consequences. UKVI may suspend or revoke the sponsor licence, preventing the organisation from recruiting internationally. The Care Quality Commission (CQC) may also be notified, which can affect registration and ratings.

Criminal prosecution is possible in the most serious cases. Directors and senior managers can be held personally liable where exploitation is found to be deliberate or systemic.

Workers who have been unlawfully charged have the right to recover those payments. Employment tribunals and civil courts have consistently ruled in favour of workers in these cases.

WHY PROVIDERS SHOULD BE CONCERNED

Providers engaging in exploitative practices expose themselves to significant legal, regulatory and commercial risk, including:

- Revocation of their sponsor licence.
- Loss of the ability to recruit overseas workers.
- Investigation by the Home Office and UKVI.
- HMRC investigations into unlawful wage deductions and National Minimum Wage compliance.
- Care Quality Commission scrutiny where exploitation affects safe, effective and well-led services.
- Employment Tribunal claims.
- Civil litigation and compensation claims.
- Criminal investigation where evidence suggests fraud, forced labour or modern slavery.
- Exclusion from local authority commissioning opportunities.

What Employers Must Do

01	02	03
Never charge workers any fee related to sponsorship, visa costs (including extensions) or immigration administration.	Ensure all employment contracts are transparent, lawful, and do not contain unlawful deduction clauses.	Pay all visa and immigration costs directly, do not pass these on to workers in any form.
04	05	
Maintain clear records showing that no unlawful charges have been applied.	Report any internal concerns about exploitation through your governance and whistleblowing channels.	

13. Final Compliance Checklist & Resources

Use this checklist as a rapid self-assessment tool. Every item below represents a compliance obligation that UKVI inspectors will assess directly or indirectly. If you cannot confidently answer yes to each point, it identifies a priority area for immediate action. Compliance is continuous, not a one-time check, and this checklist should be revisited regularly, not only when an inspection is anticipated.

✓ Final Compliance Checklist

- **Recruitment compliant:** No fees charged, agencies vetted, job descriptions accurate, conditions transparent
- **Salary maintained:** Every sponsored worker paid at or above required threshold in every pay period
- **Records complete:** All 10 documents held on file, current, and instantly accessible for every sponsored worker
- **Reporting up to date:** All changes to roles, salaries, hours, and absences reported to UKVI on time
- **Governance active:** Named accountable owners, scheduled reviews, cross-functional alignment in place
- **Managers prepared:** Briefed, confident, and able to respond to inspector questions clearly
- **Audit trail maintained:** Internal audit records, reporting logs, and compliance meeting minutes documented

Key Takeaways

- Use the correct SOC code for the role being sponsored.
- New SW sponsor guidance (March 2026): Skilled Worker sponsors must now ensure that the salary stated on the CoS is paid at or above the minimum salary requirement in every pay period. Previously, the minimum salary requirement was met through an assessment of what was paid on an annual basis.
- Maintain robust systems to monitor visa expiry dates and ensure ongoing compliance.
- Respond to Home Office requests promptly and comprehensively.

NB. The Home Office can request any document at an audit.

Compliance is continuous, not a one-time check. Every sponsored worker in your organisation represents both a responsibility and a commitment. Maintaining that commitment with rigorous, well-documented, consistently applied systems is what protects your licence, your workforce, and your reputation.



Stay Up to Date: Live Resources

UK Visas & Immigration (UKVI) www.gov.uk/ukvi

Immigration Rules

www.gov.uk/guidance/immigration-rules

Sponsor a Licence: Guidance for Employers [Sponsor Licence Guidance](https://www.gov.uk/guidance/sponsor-a-licence)

HMRC www.gov.uk/hmrc

Care Quality Commission (CQC) www.cqc.org.uk

Skills for Care www.skillsforcare.org.uk