Right to Work & Identity Verification

Policy

LIQUID FRIDAY

Purpose

Liquid Friday is committed to ensuring that all individuals employed by the Company have a valid Right to Work in the United Kingdom and that appropriate measures are taken to verify their identity before employment commences.

This policy sets out the procedures for verifying a worker's Right to Work, confirming that the individual presenting for employment is the same individual whose identity has been verified, and maintaining an auditable record of the checks completed.

The policy is designed to: Comply with Home Office Right to Work requirements, prevent illegal working, reduce the risk of identity fraud and worker impersonation, protect workers, recruitment agencies, end hirers and the wider labour supply chain, and ensure appropriate records are retained to demonstrate compliance.

No worker will be cleared to commence employment until the required verification and compliance checks have been successfully completed.

Scope

This policy applies to all individuals employed by Liquid Friday and supplied to clients and end hirers through recruitment agencies or other labour supply arrangements.

The policy applies prior to the commencement of employment and throughout the duration of employment where ongoing Right to Work checks are required.

Step 1 – Worker Referral

Upon receipt of a worker referral from a recruitment agency, the worker will be invited to complete onboarding.

The worker must provide:

- Full legal name
- Date of birth
- Current residential address
- Contact details
- National Insurance number (where applicable)

Step 2 – Right to Work Verification

The appropriate Right to Work verification method will be selected based on the worker's nationality, immigration status and the documentation available.

British and Irish Citizens

Where eligible, verification will be completed through TrustID, our approved Identity Service Provider (IDSP).

This process includes:

- Identity document validation
- Facial biometric matching
- Liveness testing
- Digital identity verification

Individuals with Digital Immigration Status

Workers who hold a visa or other immigration status that is evidenced digitally will be required to provide a valid Home Office share code.

Right to Work verification will be completed using the Home Office online Right to Work checking service in accordance with Home Office guidance.

Manual Document Verification

Where a digital verification route is unavailable, or where documents provided cannot be processed through TrustID or verified through the Home Office online service, the worker must provide original Right to Work documentation for manual verification.
Original documents must be reviewed and verified before the worker proceeds to the live identity verification call.

No worker will progress to the next stage of onboarding until a compliant Right to Work check has been successfully completed.

Step 3 – Live Identity Verification Call

Following successful completion of the Right to Work verification process, the worker will participate in a brief live verification call with a member of the team.

The live verification call forms a mandatory part of Liquid Friday's identity assurance process and is designed to mitigate the risk of worker impersonation and substitution.

The purpose of the call is to:

- Confirm that the individual attending the call is the same individual identified during the Right to Work verification process.
- Compare the worker against the photograph obtained through TrustID or the photograph contained within the original identification documents reviewed.
- Confirm key biographical details.
- Verify assignment and contact information.

Where a live video call is not reasonably practicable, alternative evidence of visual identity verification completed elsewhere within the labour supply chain may be considered, subject to appropriate documentation and risk assessment.

Step 4 – Compliance Review

A Compliance Officer will review:

- Right to Work evidence.
- Digital verification results and/or manual document verification records.
- Identity verification outcome.
- Employment documentation.
- Any visa restrictions or conditions.

The Compliance Officer will record one of the following outcomes:

Cleared to start | Further information required | Verification failed

Step 5 – Clearance to Start

A worker will only be approved for employment when:

- Right to Work verification has been successfully completed.
- Identity verification has been completed.
- Employment documentation has been signed.
- Any compliance concerns have been resolved.

Step 6 – Agency Assurance

Following successful completion of the onboarding and verification process, Liquid Friday will provide the recruitment agency with a Compliance Pack, demonstrating that the required employment and compliance checks have been completed prior to the worker commencing an assignment.

Step 7 – Record Retention

Liquid Friday will maintain a complete audit trail of the verification process, including:

- Right to Work evidence.
- Digital verification reports and/or manual verification records.
- Identity verification call logs.
- Compliance approval records.

Records will be retained for the duration of employment and for the required statutory retention period thereafter.

Supporting evidence may be provided to agencies, end hirers, auditors or regulatory bodies upon reasonable request and in accordance with applicable data protection obligations.

Ongoing Monitoring

Further Right to Work checks will be conducted where legally required, including for workers with time-limited permission to work.

Additional identity verification will be undertaken where:

- Identity concerns arise.
- Documentation changes.
- The worker returns following a significant break in engagement.
- Worker substitution concerns are identified.

Commitment

Liquid Friday recognises its role within the labour supply chain and is committed to implementing proportionate controls to prevent illegal working, worker impersonation, identity fraud and labour supply chain abuse.

Liquid Friday is committed to maintaining robust Right to Work and identity verification controls designed to protect workers, agencies, end hirers and the wider labour supply chain.

References

- Right to Work Checks: An Employer's Guide
  https://www.gov.uk/government/publications/right-to-work-checks-employers-guide
- Right to Work Checks: Employer Guidance Collection
  https://www.gov.uk/government/collections/right-to-work-checks-employer-guidance
- Illegal Working Penalties: Codes of Practice for Employers
  https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers
- Code of Practice for Employers: Avoiding Unlawful Discrimination While Preventing Illegal Working
  https://www.gov.uk/government/publications/right-to-work-checks-code-of-practice-on-avoiding-discrimination
- Checking a Job Applicant's Right to Work
  https://www.gov.uk/check-job-applicant-right-to-work
- Right to Work Checklist
  https://www.gov.uk/government/publications/right-to-work-checklist

Where there is any conflict between this policy and current legislation or Home Office guidance, the applicable legislation and Home Office guidance shall take precedence.

Data Control

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