



REC

Recruitment
& Employment
Confederation

Recruitment & Employment Confederation
Dorset House, First Floor, 27-45 Stamford Street, London, SE1 9NT
Tel: 0207 009 2100 Email: info@rec.uk.com Web: www.rec.uk.com



Association of Professional Staffing Companies Ltd
101 Borough High Street, London SE1 1NL
Tel: 0203 117 0910 Email: info@apsco.org Web: www.apsco.org

Tom Pursglove MP
Parliamentary Under Secretary of State
(Minister for Immigration Compliance and Justice)

21 January 2022

By email only: immigrationminister@homeoffice.gov.uk

Dear Mr Pursglove,

Costs of Digital Right to Work Checks

The REC has previously written to your predecessor, Chris Philp, on right to work (RTW) checks and we are now keen to continue working closely with the Home Office on this.

Following our conversations with Minister Philp and Home Office colleagues, we were pleased that the government confirmed last year that a permanent digital RTW checking system would be introduced for UK nationals from April this year.

This is exactly the right call from an efficiency and safety perspective. However, the REC and our membership do have concerns over the proposed costs per check suggested by the Home Office's report on the new system. The difference in proposed cost, ranging from £1.45 to £75 per check, could be a huge barrier to any employer using the new system, but particularly to our members given the sheer number of checks an employment business is required to do. Our industry conducts these checks to ensure all compliance procedures are met. The REC conservatively estimates that the UK recruitment industry conduct upwards of 300,000 RTW checks a week which means the costs of this will rapidly add up and become prohibitive. The UK jobs market has bounced back strongly from the pandemic. In the face of rising inflation and soaring energy prices, it's vital we keep the labour market moving so more people can find work, change jobs and afford the cost of living increases that lie ahead.

Based on the middle point of the suggested range of costs (£38.23), one REC member has informed us that this would have amounted to £18,044.56 in costs for them in the 2021/22 financial year to date. Over the last five years, the total outlay for this agency would have been £156,322.47, just on RTW checks. At this level of cost, it would not be possible for an agency to use the new system on a regular and frequent basis as each candidate would need to work for over a week before the agency covered their total costs and made a return.



REC

Recruitment
& Employment
Confederation

Recruitment & Employment Confederation
Dorset House, First Floor, 27-45 Stamford Street, London, SE1 9NT
Tel: 0207 009 2100 Email: info@rec.uk.com Web: www.rec.uk.com



Association of Professional Staffing Companies Ltd
101 Borough High Street, London SE1 1NL
Tel: 0203 117 0910 Email: info@apsco.org Web: www.apsco.org

Multiple agencies have reported to the REC that any cost over a nominal amount (roughly £1 - £2) would force them to reconsider their wider business planning and candidate vetting processes. One agency in particular made it clear that high costs for RTW would prevent them from registering candidates, reducing the opportunities they would be able to provide for workers. If this scenario was repeated at agencies across the UK, then fewer candidates would be registered, and this would undermine the efficiency benefit that was one of the driving arguments behind the introduction of digital RTW.

Two-tiered RTW System

In addition to the costs being prohibitive, the REC remains concerned about the two-tiered system this creates between UK nationals and overseas candidates. Overseas candidates can have their RTW checked via the free online checking service. Requiring agencies to pay to check the RTW of UK nationals, whilst a free system exists for non-UK nationals, puts UK candidates at a disadvantage. The discrepancy between the online checking service for overseas candidates and the requirement for UK nationals to have their RTW checked in person was a key reason for digital RTW to be introduced. By introducing a digital check for UK nationals but then charging for the service, the two-tier system remains in place - the nature of the discrepancy has just changed.

The REC is always happy to discuss this further and engage with the Home Office to ensure digital RTW checks can be implemented in a fair and accessible manner for all work seekers and businesses. We're keen to work with you and your team so the potential scale of costs can be limited. It is important that these concerns over costs are addressed before guidance on IDVT providers is issued by government and to allow businesses time to make informed decisions over their use of the new technology. We can facilitate opportunities to speak with our members directly to review and test how the new system will work in practice - we found this was a useful approach last summer when considering the value of digital RTW checks. Natalie in my office (natalie.wright@rec.uk.com) can help us find a convenient time to discuss further. In the meantime, thank you to you and your team once again for proceeding with RTW checks and we look forward to working with you on developing a workable system for everyone.

Yours sincerely,

Kate Shoesmith
Deputy CEO
Recruitment & Employment Confederation.



REC

Recruitment
& Employment
Confederation

Recruitment & Employment Confederation
Dorset House, First Floor, 27-45 Stamford Street, London, SE1 9NT
Tel: 0207 009 2100 Email: info@rec.uk.com Web: www.rec.uk.com



Association of Professional Staffing Companies Ltd
101 Borough High Street, London SE1 1NL
Tel: 0203 117 0910 Email: info@apsco.org Web: www.apsco.org