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DIGITAL CARE HUB X BORDERLESS

Digital checks and data standards

Staying compliant as the Home Office goes digital. What sponsor licence holders in care need to know

THURSDAY 17 SEPTEMBER 2026, 11:30 UK

THIS SECTION

What I'll cover

01 **What has actually changed. eVisas, online checks, and the SMS**

02 **Where a digital check still leaves you exposed**

03 **1 October. Right to work checks expand**

04 **Q&A with Michelle and Will**

The Home Office has gone digital. Your duty to evidence it has not changed.

- The status is digital. The obligation to prove you checked it is yours
- A digital process is not automatically a compliant one
- Most providers are running a 2023 process against 2026 rules

What has actually changed

Three shifts, happening at once

SHIFT ONE

The card in the drawer cannot carry a new check

BRPs stopped being issued on 31 October 2024

None of them carries an expiry date beyond 31 December 2024

An expired BRP is not acceptable proof of right to work

But a check you did properly at the time **still protects you** , as long as any follow-up was done.

SHIFT ONE, CONTINUED

The check has moved, not disappeared

THEN

- 01 Take the card
- 02 Photocopy it
- 03 File it
- 04 Date it and sign it

NOW

- 01 Ask for a share code
- 02 Enter it with their date of birth
- 03 Check the photo is them
- 04 Save the profile page

Their screenshot is not your check. It has to go through the online service.

SHIFT TWO

Multi-factor authentication on the SMS

Phased licence by licence, with two weeks' notice by email



- Check the date of birth, mobile number and email on your Level 1 User records now. MFA runs off them
- **An SMS account unused for 12 months gets deactivated. Lose every Level 1 User and the licence follows**

The Home Office will never ask for your user ID, password, one-time passcode or date of birth outside the SMS system

The Home Office digitised the status. It did not digitise your duty to evidence it.

Where a digital check still leaves you exposed

Three gaps, and what closes each one

THE THREE GAPS

Three places a check passes and you are still exposed



The wrong tool

A certified provider cannot check anyone who holds an eVisa



The wrong evidence

Their screenshot is not your check



The wrong moment

The excuse expires with the permission, not with the job

The digital identity check you can buy will not cover your sponsored workers

What a certified provider can check

Sponsored workers, Valid British and Irish passports, and Irish passport cards

From 1 October, other documents too, but only where the issuing authority makes them available digitally

You still confirm the person matches the photo, and still save the report

The provider does the verification. You keep the liability.

GAP TWO

Their screenshot is not your check

The statutory excuse comes from you going through the employer side of the service yourself

Viewing what the worker sees on their side does not create one

Nor does a copy of a document, for a check you are doing today

If it did not go through the online service, **it did not happen**

The excuse expires with the permission, not with the job



BEFORE THEY START

The check happens before the first day of work, not during the first week



ON THE RIGHT PERSON

On the person actually doing the work



WATCH THE EXPIRY

Where permission is time-limited the excuse runs only to its expiry, and for anyone with an eVisa the follow-up goes through the online service



KEEP IT, THEN DESTROY IT

The duration of employment plus two years, then securely destroyed

A worker who was compliant in March can be a breach in October **without doing anything wrong**

FREE RESOURCE

The right to work check checklist

What to check, in what order, and what to keep. Built for sponsored workers on digital status

SCAN TO DOWNLOAD



getborderless.co.uk/checklists/

1 October 2026

Right to work checks expand beyond your employees

1 OCTOBER 2026

From 1 October, the duty follows the work, not the contract

-
- 01 **Settled law.** Section 48, Border Security, Asylum and Immigration Act 2025, in force 1 October 2026
-
- 02 **Now in scope.** People engaged under a worker's contract, individual subcontractors, and anyone sourced through an online matching service. In practice: agency workers, bank and platform workers, their substitutes, and casual and zero-hours workers
-
- 03 **Still out of scope.** People operating in business on their own account, contracting directly with clients or customers. Not people who get work through a platform or intermediary
-
- 04 **Not retrospective. A penalty can only be imposed where the engagement started on or after 1 October 2026**
-

1 OCTOBER 2026

Care runs on exactly the arrangements coming into scope



AGENCY COVER

From 1 October, who checks the worker who fills a new shift, and who holds the evidence



BANK AND PLATFORM WORKERS

Sourced through an app, and the substitutes they send count too



INDIVIDUAL SUBCONTRACTORS

The self-employed carer engaged directly, and anyone in a chain below your supplier



WHERE THE DUTY SITS

With whoever holds the direct contract. Your protection is what that contract requires them to do

A clause saying the agency is responsible is not the same as **evidence that a check happened**

WHAT IT COSTS

Getting right to work wrong

£45,000

Per worker, for a first breach.
£60,000 per worker if it happens
again within three years

Up to £10,000 per worker comes off for mitigation, and a first breach can end in a warning notice instead

WHAT GOOD LOOKS LIKE

When the evidence is digital, the discipline has to be too.

- One list of every arrangement, not one person's memory
- Checks done through the right door, retained for employment plus two years
- **And the data behind all of it protected properly, which is where Michelle started**

WHERE THIS GETS EASIER

Providers who join us close the gap in a quarter

AUDIT-READINESS SCORE

AT SIGN-UP

43%

of records audit-ready

AFTER 90 DAYS

96%

same records, one place



Day 1

Every existing check scored against what an audit asks for. The gaps end up on a list, not in someone's memory



Day 90

Checks through the right door, evidence retained to standard, every expiry diarised before it lands

Borderless customer data, first 90 days after onboarding.

WE'RE LISTENING

Q&A

Immigration and sponsor licence questions to Will. Data protection and cyber security to Michelle

FREE CHECKLIST



The right to work check
checklist

BOOK A DEMO



General guidance, not advice on your specific case



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Thank you

Digital Care Hub x Borderless, 17 September 2026

[GETBORDERLESS.CO.UK](https://getborderless.co.uk)



Run by social care providers
for social care providers.

Data Standards: Staying Compliant as the Home Office Goes Digital

Will Murch, Head of Commercial Growth, Borderless
Michelle Corrigan, Chief Executive Officer, Digital Care Hub



Run by social care providers
for social care providers.

Cyber Security and Data Protection in context

*Michelle Corrigan, Chief Executive Officer,
Digital Care Hub*

Cybersecurity Threats in social care

- Government report: <https://www.gov.uk/government/publications/the-state-of-cyber-security-in-adult-social-care>
- 79% of care providers have well-established approaches to identify cyber threats within last 12 months
 - Risk assessments
 - Staff awareness
 - Cyber security vulnerability audits
- 33% reported a cyber incident or unsuccessful attack in the last 3 years
 - Potential underreporting?
- Most common attacks:
 - Phishing (75%)
 - People impersonating their organisation (35%)

The state of cyber security in adult social care

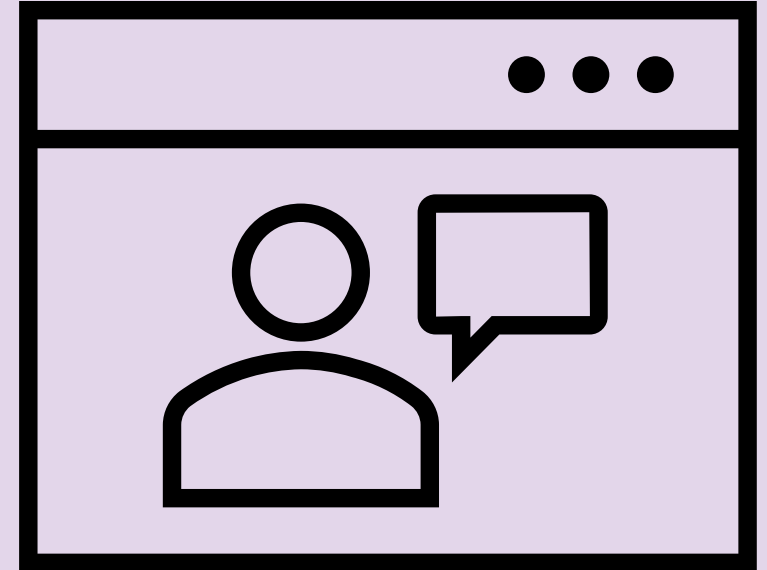
- On average, care providers spent £2,575 dealing with cyber security incidents over the last 3 years.
- Care providers who reported at least one incident incurred an average cost of £9,528 dealing with this or these incidents over the last 3 years.
- The highest cost of incidents reported by an individual provider over the past 3 years cumulatively stood at £900,080.

The vast majority of incidents (89%) resulted in actions being taken by the care provider - for example, carrying out training and/or communications to staff (61%) or reviewing or updating their cyber policies and procedures (50%).

Cyber risk in health and care

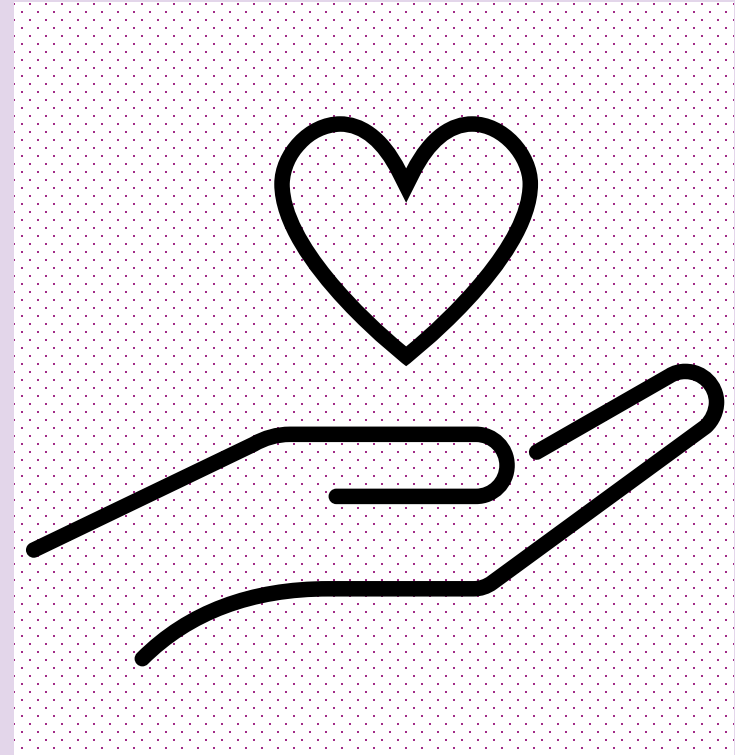
- Over 120 ransomware incidents have affected the NHS in recent years
- The WannaCry attack cancelled around 19,000 appointments and operations*
- Healthcare is one of the most targeted sectors globally for ransomware**

*<https://www.nao.org.uk/reports/investigation-wannacry-cyber-attack-and-the-nhs/>



Why this matters for social care

- Care providers hold highly sensitive personal information
- Digital care records are now widespread
- Remote monitoring and digital tools are expanding
- Cyber incidents can directly affect care delivery



Common Sponsor Licence Scams

Subject: Sponsor licence – Upcoming compliance appointment

A compliance visit has been scheduled for your organisation. Please review the details in your SMS account and prepare the required documentation.

Sponsorship Management System

Compliance Visit Notice – Sponsorship Management System (SMS)

Compliance Visit Scheduled

Dear Authorising Officer,

We are writing to inform you that a compliance visit has been scheduled for your organisation in relation to your duties as a licensed sponsor under the Points-Based Immigration System.

Visit Details

Date: Thursday, 25 June 2026

Time: 10:00 – 14:00

Reference: COMP-2026-0847

During the visit, the compliance officer will review your sponsorship records, HR systems, and migrant worker files to ensure you are meeting your sponsorship duties. A full list of required documentation has been posted to your SMS account.

Please ensure the following personnel are available:

- Authorising Officer
- Key Contact (Level 1 user)
- HR Manager or relevant personnel responsible for migrant workers

Access your SMS account to view the full visit notice and required documentation checklist:

[View Visit Details in SMS](#)

For enquiries regarding this visit, please contact:

sponsor-enquiries@homeoffice.gov.uk

Quoting reference: **COMP-2026-0847**

Kind regards,
Sponsor Compliance Unit
UK Visas and Immigration

This message was sent by UK Visas and Immigration, part of the Home Office. If you believe you have received this notification in error, please disregard it or contact sponsor-enquiries@homeoffice.gov.uk.

UK Visas and Immigration
2 Marsham Street
London
SW1P 4DF
United Kingdom

To update your communication preferences, please [contact us](#).

Photo by [FlyD](#) on [Unsplash](#)

Importance of Cybersecurity and Data Protection

- Data safety is client safety
- Legal responsibility to protect data
- Increased data sharing: real benefits, but also new risks such as cyber attacks
- The present – never mind the future – is digital
- Indicator of good quality
- Regulatory requirement
- Increased loss of data risk with some service types i.e. homecare
- Staff using their own devices for work purposes

Impact of a cyber attack

"I cannot express the emotional stress this caused..."

It felt like we were watching a burglary on CCTV without any power to intervene.

Email accounts literally disappeared mid-email. It felt like being in a Hollywood film

As soon as we made a fix on one area something else went down or became disrupted."

Anonymous care home

Better Security, Better Care

Free national and local support with
Data Security and Protection Toolkit



DSPT
Better Security.
Better Care.



Digital
Care Hub

Best Practices for Data Security

Top Tips



Photo by [FlyD](#) on [Unsplash](#)

- Complete the Data Security and Protection Toolkit
- Have clear policies
- Business Continuity Plans
- Staff training and culture
- Think through staff use of mobile devices
- Invest in cyber insurance
- Identify who has responsibilities for managing cyber security at a senior level



Thank you

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