



Home Office

An employer's guide to the administration of the civil penalty scheme

28 July 2014

Produced by the Home Office

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1. Introduction

Illegal working often results in abusive and exploitative behaviour, the mistreatment of illegal migrant workers, tax evasion and illegal housing conditions. It can also undercut legitimate businesses and have an adverse impact on the employment of people who are lawfully in the UK.

The law on preventing illegal working is set out in sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 (the 2006 Act). This legislation replaced section 8 of the Asylum and Immigration Act 1996 (the 1996 Act) in respect of employment which commenced on or after 29 February 2008. Under section 15 of the 2006 Act an employer may be liable for a civil penalty if they employ someone who does not have the right to undertake the work in question.

Employers have a duty to prevent illegal working in the UK by carrying out prescribed document checks on people before employing them to ensure they are lawfully allowed to work.

Changes to the scheme in May 2014

On 16 May 2014 changes came into force to strengthen and simplify the civil penalty scheme to prevent illegal working. This includes some changes to the way in which the scheme is administered and the introduction of new notices that employers may receive during the process.

The changes to the civil penalty process include the following:

- **We have increased the maximum civil penalty and revised the method for calculating penalty amounts.** We still have a sliding scale of penalties which continues to take into account an employer's compliance record and mitigating factors. For a first breach in a three-year period, the new starting penalty is £15,000 per illegal worker. For a second or subsequent breach in a three year period the starting point is £20,000¹.
- **We have a new consideration framework which includes changes to the mitigating factors which, if applied, can reduce a civil penalty amount or result in a Warning Notice.** Each mitigating factor will result in a reduction of the penalty by £5,000. It is also possible, in certain circumstances, to receive a Warning Notice for a first breach.
- **We have increased the reduction for fast payment of a civil penalty from 20 per cent to 30 per cent.** We have also extended this option to all cases where this is the first breach to have occurred within a three year period² (this is regardless of the number of illegal workers identified on one civil penalty notice), and following an objection against a civil penalty where the employer remains liable for a civil penalty.
- **We have introduced a 'no action notice'.** This will be served on an employer who is able to demonstrate they have a statutory excuse for any identified illegal workers during a visit to their business premises. The case for a breach of section 15 of the Act will be closed for those workers.

¹ Unless the employer previously had a statutory excuse and was not found liable for a civil penalty.

² As above

- **We have introduced new notices which will be issued to administer the civil penalty scheme.** The notices will explain the outcome of Home Office decisions, and what action is required by the employer and by when.

Changes to the scheme in July 2014

As a result of the Immigration Act 2014:

- **Employers must object before they appeal against a civil penalty.** We have introduced the requirement for employers to exercise their right to object against a civil penalty before they appeal to the civil court. The exception is where a civil penalty has been increased following an unsuccessful objection, when the employer may raise a new objection or proceed directly to an appeal. The new arrangements apply to penalty notices issued on or after 28 July 2014.
- **We are making it easier to enforce an unpaid civil penalty in the civil courts.** The Secretary of State will be able to register the debt rather than issue a substantive claim in the civil court which means that enforcement proceedings can be issued immediately. This does not affect the employer's rights to object and appeal earlier in the process. The new arrangements apply to cases in which proceedings for the enforcement of a penalty are commenced on or after 28 July 2014.

For whom is this guide relevant?

This guide applies in respect of employment which commenced on or after 29 February 2008 where the breach of section 15 of the Act occurred on or after 16 May 2014.

Where the employment commenced on or after 29 February 2008 and the breach occurred before 16 May 2014, the Code of practice published in February 2008 and the employer guidance published in October 2013 continue to apply.

This guide applies to employers who employ staff under a contract of employment, service or apprenticeship, whether expressed or implied and whether oral or in writing. It does not apply to those who carry out work with a genuine self employed status.

How should this guide be used?

This guide sets out how Home Office officials will administer the illegal working civil penalty scheme in cases of illegal working which occur on or after 16 May 2014. It provides guidance on the process, the range of notices that may be sent to an employer and the relevant timeframes for any action they may be required to take. It also explains the factors taken into consideration when making a decision on a case.

This guide has been issued alongside the following:

- An employer's guide to acceptable right to work documents;
- An employer's guide to right to work checks;
- Frequently asked questions;
- An employer's 'Right to Work Checklist';
- An online interactive tool 'Check if someone can work in the UK';
- Code of practice on preventing illegal working: Civil penalty scheme for employers; and

- Code of practice for employers: Avoiding unlawful discrimination while preventing illegal working.

They can be found on the illegal working penalties page on [GOV.UK](https://www.gov.uk).

Who should read this guidance?

Home Office officials will have regard to this guidance when administering the scheme. Employers, their legal representatives and those staff with delegated responsibility for recruitment and employment should also read this guide to understand how decisions in cases of illegal working are made, the types of notices they may receive and the relevant timescales for each stage of the process.

References in this guidance

'We' or 'us' in this guidance mean the Home Office. References to 'you' and 'your' mean the employer.

'Days' means calendar days, i.e. including Saturdays, Sundays and bank holidays.

'Employee' or 'worker' means someone who is employed under a contract of employment, service or apprenticeship.

'Breach' or 'breaches' mean that section 15 of the Immigration, Asylum and Nationality Act 2006 has been contravened by employing someone who is:

- subject to immigration control; and
- aged over 16; and
- not allowed to carry out the work in question because either they have not been granted leave to enter or remain in the UK or because their leave to enter or remain in the UK:
 - (i) is invalid;
 - (ii) has ceased to have effect (meaning it no longer applies) whether by reason of curtailment, revocation, cancellation, passage of time or otherwise; or
 - (iii) is subject to a condition preventing them from accepting the employment.

A breach also refers to the contravention of the Accession of Croatia (Immigration and Worker Authorisation) Regulations 2013.

'Employment of illegal workers within the previous three years' means you have been issued with a civil penalty or warning notice in respect of a breach of the Act or the Accession of Croatia Regulations 2013 for one or more workers which occurred within three years of the current breach and your liability was maintained following the exercise of any objection and/or appeal, or you have committed an offence under section 21 of the Act during the same period.

2. Overview of the civil penalty process

The civil penalty process is made up of **seven** key stages. The following summary states what these are, however, the list should not be taken as chronological because some stages may overlap.

Illustration 1: Summary illustration of each stage of the civil penalty process

Breach	<ul style="list-style-type: none">• Breach of section 15 occurs.
Referral	<ul style="list-style-type: none">• Referral is made to consider liability for a civil penalty.
Decision	<ul style="list-style-type: none">• Decision is made on liability and the appropriate notice is issued.
Payment	<ul style="list-style-type: none">• Payment of the civil penalty or object.
Objection	<ul style="list-style-type: none">• Object to the civil penalty or pay.
Appeal	<ul style="list-style-type: none">• Appeal against the civil penalty or pay.
Enforcement	<ul style="list-style-type: none">• Enforcement action may be taken if no payment, objection or appeal is made on time.

Each stage is explained in further detail below. A further summary is provided at [Annex A](#).

For penalty notices issued on or after 28 July 2014 employers must exercise their right to object against a civil penalty before they appeal to the civil court. The exception is where a civil penalty is given following an objection (when the penalty has been increased) when the employer may choose to object or proceed to appeal.

3. Breach

The civil penalty process starts when an employer is found, or suspected to be employing illegal workers.

In the event that illegal workers are encountered by officials visiting your business premises, you will be provided with an opportunity at this time to demonstrate that you have complied with the law. You should do this by showing officials that you have correctly carried out the required right to work document checks, and established a statutory excuse against liability for a civil penalty.

Officials will consider any evidence you give them to determine whether or not you have clearly established a statutory excuse for each illegal worker. They will then make a decision to issue you with a **No Action Notice** or a **Referral Notice** in respect of each illegal worker.

If officials determine that you have clearly established a statutory excuse for an illegal worker you will be issued with a **No Action Notice**.

A **No Action Notice** informs you that no action will be taken against you for any breach of section 15 of the Act on this occasion and your case has now closed for these workers. This notice will not be taken into account if you breach Section 15 of the Act in future.

If you receive a No Action Notice you should ensure that you continue to comply with the law by carrying out the correct document checks on potential and existing employees as required. You should also not employ anyone identified on the notice if they are not allowed to do the work in question. If you are found doing so, you could be prosecuted for knowingly employing an illegal worker, which may result in an unlimited fine and/or imprisonment. During any future enforcement visit, you will also be unable to rely on the statutory check you previously carried out to avoid a civil penalty liability as you now know that the employment is not permitted.

If however, officials determine that there are illegal workers for whom you **have not** established a statutory excuse you will be issued with a **Referral Notice**.

A **Referral Notice** informs you that your case is being sent to Home Office officials with responsibility for administering the civil penalty scheme, to consider your liability for a civil penalty for breaching section 15 of the Act. It also informs you how your case will be considered and the possible outcomes. If appropriate, consideration may be given to prosecution under section 21 of the Act if you have knowingly employed illegal workers.

If you receive a Referral Notice, officials will refer the evidence gathered in your case to the Civil Penalty Compliance Team. This is the Home Office team responsible for administering the scheme.

Your compliance will be taken into account in determining your case. Prior reporting of an illegal worker and active co-operation during our visit and investigations could lead to any civil penalty being reduced in amount. Further information about mitigating factors can be found in our [‘Code of practice](#) on preventing illegal working: Civil penalty scheme for employers’.

4. Referral

A copy of your **Referral Notice** together with evidence gathered in your case will be sent to the Civil Penalty Compliance Team **within 14 days** of the breach, or suspected breach, being encountered. We will then send you an **Information Request** asking for any further information and evidence which will inform our decision on your liability, and, if applicable, the level of your penalty.

The **Information Request** will ask you to confirm:

- **Your business details if you are the employer** of the illegal workers identified;
- The **business details** of the **actual employer** (if you know this) if **you are not** the employer of the illegal workers identified;
- If you have **undertaken document checks** as required on the workers named in your Referral Notice;
- If you have **reported your suspicions** about the right to work of any of the illegal workers;
- If you have **supporting documentary evidence** – which you should send us.

You should complete and return your **Response Form**, together with any supporting evidence, by the deadline given in the request. Once the deadline has passed, we will make a decision on your case on the basis of the information and evidence we hold, including any additional information you may have sent us.

5. The decision

Your case will be allocated to a case worker who will consider if you are liable for a civil penalty, and if so, at what level and amount. The caseworker will consider the four questions set out in the table below.

Table 1: Case decision questions

Questions	What is determined?
1. Who is the employer?	The party potentially liable for a Civil Penalty or Warning Notice.
2. What is the worker's immigration status and employment start date?	Whether the worker had permission to work and do the work in question and when the employment commenced in order to establish if section 15 of the Act applies.
3. Has a breach of section 15 occurred?	Whether the worker has been found in employment contrary to the Act by working when they do not have permission, or working in breach of their conditions.
4. What is the penalty level and amount?	Whether the formal response to the employer will be a Civil Penalty Notice for a specified amount, a Warning Notice or a No Action Notice .

To answer question 4 - your penalty level and amount, the caseworker will use the **Consideration Framework** and **Civil Penalty Calculator** set out in our '[Code of practice](#) on preventing illegal working: Civil penalty scheme for employers'.

There are several possible decision outcomes, which will result in you receiving one of the following notices:

- **A Civil Penalty Notice**
- **A Warning Notice**
- **A No Action Notice**

Each of these of these notices will include a [Statement of case](#) which sets out the evidence and an explanation of our decision. A description of these notices and the action required by you, are provided below.

Civil Penalty Notice

If **you are liable for a civil penalty** for employing one or more of the illegal workers who were identified on your Referral Notice, we will give you a **Civil Penalty Notice** for a specified amount.

Your **Civil Penalty Notice** will inform you why you are liable and for which illegal workers. It will state the breach date, how much you must pay (including whether reductions have been applied because you have met mitigating factors), the date payment is due, whether a fast payment option is available and the methods of payment. It will also state how you may object and, where the notice was served prior to 28 July 2014, appeal against the penalty, and how we may enforce the penalty if you fail to comply with the process.

You must either pay the penalty in full or set up payment by instalments, or object against the penalty by the deadlines given in your Civil Penalty Notice. If you fail to do so, we will take enforcement action to recover your penalty debt.

If the penalty is increased following an unsuccessful objection and a new civil penalty notice is issued, you may pay the penalty, object against the penalty or proceed directly to an appeal.

Warning Notice

In certain circumstances you may receive a **Warning Notice** when you have been found employing illegal workers and you do not have a statutory excuse for them. To qualify, you must not have been issued with a civil penalty or warning notice or been convicted under section 21 of the Act within the last three years, and you must have **met all the published mitigating factors**. The criteria are set out in our '[Code of practice](#) on preventing illegal working: Civil penalty scheme for employers'

Your **Warning Notice** will inform you **why you are not liable for a financial penalty** on this occasion and for which illegal workers. It will state that this notice is a **formal warning**, that it will be taken into account if you breach the Act again, and how to ensure you comply in future.

Where you receive a Civil Penalty or Warning Notice you should ensure that you comply with your duty to conduct right to work checks in future. If you are found employing illegal workers within the following three years, this could result in you receiving the maximum civil penalty of £20,000 for each illegal worker.

No Action Notice

If you are **not liable** for a civil penalty because, for example, you have established a statutory excuse for the identified workers, you will be issued with a **No Action Notice**. Unlike the Warning Notice, this No Action Notice will not be taken into account if you are found employing illegal workers in future.

Your **No Action Notice** will inform you **why no action has been taken** against you on this occasion and for which illegal workers. It will state that your case has been closed in respect of section 15 of the Act.

You should ensure you comply with the law by continuing to conduct right to work document checks on potential and existing employees as required. You should not employ anyone identified in this notice if they are not allowed to do the work in question. It is a criminal offence to knowingly employ an illegal worker. You will also not be able to rely on your statutory excuse against a civil penalty if you know the employment is prohibited.

Statement of Case

As part of your Civil Penalty, Warning or No Action Notice, you will receive a **Statement of Case** setting out the evidence and the reasons for our decision in your case.

Your **Statement of Case** will inform you of the types of evidence we hold together with an explanation for our decision for each illegal worker. It will state how the total penalty amount has been calculated if you have been issued with a Civil Penalty Notice and, if applicable, provide our response to other points you have raised.

6. Payment

Your **Civil Penalty Notice** will state the civil penalty amount and the date by which your payment should be made. The due date for the full amount is **28 days** from the date your Civil Penalty Notice was given and will be clearly shown on your notice. The possible methods of payment will also be explained. **If you fail to pay your penalty or exercise your objection or appeal rights by the deadlines given, enforcement action may be taken against you.**

Fast payment option

We have a fast payment option which reduces the amount of your civil penalty by **30 per cent** if we receive payment **in full within 21 days of it being due**. The discounted penalty amount and the final date by which you must pay will be clearly shown on your notice. If you have been found to be employing illegal workers within the previous three years for whom you did not have a statutory excuse, you are not eligible for this reduced payment after the first penalty notice or offence.

If you object to your penalty before the deadline given in your Civil Penalty Notice, you will continue to be eligible for the fast payment option. If you remain liable for a civil penalty following your objection you will be given a fresh notice which gives a new date by which you may pay your penalty at the lower amount under the fast payment option.

Payment by instalments

We will consider the impact of the penalty on you insofar as you are unable to pay it in one lump sum. We may agree that you are able to pay your penalty by instalments over an agreed period of time, usually up to 24 months, and exceptionally up to 36 months. We will not reduce the penalty amount.

You may request to pay the penalty by way of an instalment plan by **Direct Debit**. If you wish to take up this option you should contact the Home Office Shared Service Centre by e-mail to Order-to-cash@homeoffice.gsi.gov.uk stating that you wish to request an instalment plan or by writing to the Order to Cash Team at:

Order to Cash Team
Home Office Shared Service Centre
HO Box 5003
Newport
Gwent
NP20 9BB
Telephone: 0845 0100125

This should be **done within 28 days** of the date your Civil Penalty Notice was given, in order for your application to be considered. When we inform you of our decision, we will state when the payment or payments are due. Your request to pay by instalments does not affect the time limits within which an objection against the civil penalty must be brought.

If you do not pay an instalment on the due date, debt recovery enforcement action will be taken. A fast payment option may not be paid by instalments.

7. Objection

If you receive a **Civil Penalty Notice** and you want to object, you have **28 days** from the date given in your notice to do so. Subject to the exception below, you must exercise your objection against a penalty before you appeal to a civil court. The final date by which we must receive your objection will be clearly shown in your notice. You should object using the **Objection Form**, which you will receive with your Civil Penalty Notice. You should indicate on which of the specified grounds you are objecting, and provide your reasons and supporting evidence. The form must be sent to the return address in your notice by the deadline given.

You may object on the **grounds** that:

- you are not liable to pay the penalty (this could mean you are **not** the employer of the illegal worker(s) identified);
- you have a statutory excuse (this means you carried out document checks as required); and/or
- the level of penalty is too high (this means we have miscalculated the amount of your penalty by reference to the wrong scale, or you have evidence that you have met specified mitigating criteria which we have not taken into account).

A caseworker will review the **additional evidence** supplied with your objection and make the decision as to whether your civil penalty is cancelled and closed, cancelled and replaced by a formal warning, maintained, or is reduced, or increased in amount.

You will then receive one of the following notices informing you of the outcome of your objection within 28 days of us receiving your completed Objection Form:

- **A Warning Notice**
- **A new Civil Penalty Notice (where the penalty is increased)**
- **An Objection Outcome Notice (Penalty maintained)**
- **An Objection Outcome Notice (Penalty reduced)**
- **An Objection Outcome Notice (Penalty cancelled)**

Each of these notices will include a [Statement of case](#).

If the penalty is increased following an unsuccessful objection, you will receive a new Civil Penalty Notice. You must pay the penalty in full or set up payment by instalments. You also have the right to object to the new notice, but you may exercise a right of appeal without first raising another objection.

If your penalty amount is reduced or maintained you will receive an Objection Outcome Notice (Penalty reduced) or an Objection Outcome Notice (Penalty maintained) respectively. You must either pay the penalty in full or set up payment by instalments, or appeal against the penalty by the deadlines given in your notice.

If you objected to your penalty before the deadline given in your Civil Penalty Notice, you will continue to be eligible for the fast payment option if you remain liable for a penalty.

If you fail to pay, object (where relevant) or appeal by the deadlines given, we will start enforcement action to recover the penalty debt.

8. Appeal

When your objection against a civil penalty has been determined, or you have not been informed of a decision on your objection within 28 days, you may bring an appeal to a civil court. You must lodge your appeal within 28 days from the date given in your notice to do so unless a longer period has been agreed. You may appeal against your civil penalty to a County Court in England, Wales and Northern Ireland and to the Sheriff Court in Scotland. If you wish to appeal you must do so by the deadline given in your Civil Penalty Notice.

In England and Wales an appeal must be filed using Form N161, which you can obtain from any County Court office or on the [HM Court Services website](#). You will need to submit the completed appeal form with the relevant fee. In Scotland an appeal is made by summary application. For details of the fee applicable in Scotland you should contact your local Sheriff Court. In Northern Ireland you should contact your local County Court for advice on how to appeal and the fees.

You may appeal on the grounds that:

- you are not liable to pay the penalty (this could mean you are **not** the employer of the illegal worker(s) identified);
- you have a statutory excuse (this means you carried out document checks as required); and/or
- the level of penalty is too high.

If you appeal against a civil penalty, the court may allow the appeal and cancel the penalty; or allow the appeal and reduce the penalty; or dismiss the appeal.

You should be aware that if your appeal to the court does not succeed, the court may order that you pay the reasonable costs/expenses of the Home Office in defending your appeal. If, however, your appeal is successful, the court may order that the Home Office pay your reasonable costs/expenses of the appeal.

You are also required to serve the appeal papers on the Secretary of State for the Home Department. You can do this by sending a copy of the papers by recorded delivery to:
Treasury Solicitor's Department, 1 Kemble Street, London, WC2B 4TS.

9. Enforcement action

If you **do not pay the penalty** in full or set up and comply with payment by instalments, or object or appeal by the deadlines given in your **Civil Penalty Notice or Objection Outcome Notices**, we will start action to recover the civil penalty.

This action may have an adverse impact on your ability to obtain credit in the future and act in the capacity of a director in a company.

If we seek to register the judgement, it will enter the County Court Register of Judgments. Banks and other financial institutions may check this Register when deciding whether to offer credit or other services.

Adverse impact of a civil penalty on future immigration applications

If you are an employer who is subject to immigration control, you should also be aware that if you are liable for a civil penalty, this will be recorded on Home Office systems and may be taken into account when considering any future immigration application that you make.

Adverse impact of a civil penalty on a sponsor licence

If you are liable for a civil penalty, it could also affect your ability to sponsor migrants who come to the UK in the future, including those you wish to work for you under Tier 2 of the Points Based System, or to hold a Gangmaster licence. You can find more information on the effects of a civil penalty on an existing or prospective sponsor in guidance published on our [sponsor pages](#) on the GOV.UK website'.

More information can also be found on the [Gangmaster Licensing Authority](#) website.

We also publish the details of employers of illegal workers on the government's website.

Annex A - Summary of each stage in the civil penalty process

Stage	Activities	Possible outcomes for the employer	Potential action required by employer
Breach	<ol style="list-style-type: none"> 1. Illegal working encountered. 2. Officials consider evidence of a statutory excuse during any visit to a business premises. 3. Officials consider evidence against published criteria to determine appropriate action. 4. Officials gather evidence of illegal working (where applicable). 	<ol style="list-style-type: none"> 1. No Action Notice issued for illegal workers with a clear statutory excuse – case is closed in respect of section 15. 2. Referral Notice issued for illegal workers without a statutory excuse – case remains open and referred for consideration of liability for a civil penalty. 	<ol style="list-style-type: none"> 1. Active co-operation with officials during their visit and investigations. 2. Ensure employment of workers listed in a No Action Notice is not in breach of the law. 3. Ensure workers identified in the Referral Notice are not employed in breach of the law. 4. Gather supporting information and documentary evidence in anticipation of the Information Request.
Referral	<ol style="list-style-type: none"> 1. Referral Notice and referral pack received by the Civil Penalty Compliance Team. 2. Information Request issued to the employer. 	<ol style="list-style-type: none"> 1. Information Request received by the employer requesting confirmation of a) the business details of the employer of the identified workers, b) whether document checks have been conducted and c) whether illegal working suspicions have been reported. 	<ol style="list-style-type: none"> 1. Information Response Form completed by the employer and returned with supporting evidence and information by the deadline given. 2. Continued active co-operation with officials during their investigations.
Case decision	<ol style="list-style-type: none"> 1. Case worker given the completed Information Response Form together with all evidence and information held in the case. 2. Case worker considers the four case decision questions 3. Case worker issues the appropriate notice to the employer setting out the decision. 	<ol style="list-style-type: none"> 1. Civil Penalty Notice indicating liability for a given amount. 2. No Action Notice indicating that no action will be taken on this occasion for breach of section 15- case is closed. 3. Warning Notice indicating that a formal warning has been issued on this occasion. 	<ol style="list-style-type: none"> 1. Pay the penalty amount due by the date given in the Civil Penalty Notice. 2. Use the fast payment option or request payment by instalments. 3. Object against the civil penalty by the date given in the Civil Penalty Notice. 4. Ensure continued compliance for workers who have the right to work. Do not employ workers for whom employer has a statutory excuse but who it has been determined have no right to work, to avoid prosecution.
Payment	<ol style="list-style-type: none"> 1. Pay the penalty amount by one of the possible methods by the due date given. 	<ol style="list-style-type: none"> 1. Avoid adverse effects of debt enforcement action. 	<ol style="list-style-type: none"> 1. Ensure future compliance.
Objection	<ol style="list-style-type: none"> 1. Completed Objection Form submitted to the Civil Penalty Compliance Team on one or more of the specified grounds. 2. Case worker reviews the additional evidence and makes a decision on whether the civil penalty is cancelled and closed, or a warning notice is issued, or if it remains the same, or is reduced, or increased in amount. 3. Where the penalty notice was served prior to 28 July 2014, you may exercise your right of appeal without having first objected against the penalty. 	<ol style="list-style-type: none"> 1. Civil Penalty Notice – where liability is increased. 2. Warning Notice indicating the penalty is cancelled and replaced with a formal warning. 3. Objection Outcome Notice: <ul style="list-style-type: none"> - (Penalty reduced) – where the amount is less. - (Penalty maintained) – where the penalty amount is unchanged. - (Penalty cancelled) – where the penalty is cancelled and the case is closed. 	<ol style="list-style-type: none"> 1. Pay the penalty amount due by the date given in the new Notice. 2. Appeal against an Objection Outcome Notice by the date given in the Notice. 3. Object or Appeal against a Civil Penalty Notice when penalty is increased. 4. Ensure continued compliance for workers who have the right to work. Do not employ workers who have no right to work, to avoid prosecution.
Appeal	<ol style="list-style-type: none"> 1. Appeal submitted to the courts/sheriff office on one or more of the specified grounds. 2. Court/Sheriff Court procedures followed. 	<ol style="list-style-type: none"> 1. Appeal successful – penalty cancelled, or penalty reduced. 2. Appeal unsuccessful – liability remains. 	<ol style="list-style-type: none"> 1. Pay the penalty amount due by the date given in the court order. 2. No action - case is closed (if the penalty is cancelled).
Enforcement	<ol style="list-style-type: none"> 1. Debt recovery action started. 	<ol style="list-style-type: none"> 1. Adverse effect on credit and ability to act as a company Director. 2. Adverse impact on future immigration applications. 3. Adverse impact on sponsor licence. 4. Publication of details on GOV.UK for failing to pay. 	<ol style="list-style-type: none"> 1. Pay the penalty amount due.