

CQC Inspection Readiness Checklist

CQC Inspection Readiness Guide

Everything UK care providers need to prepare for a CQC inspection
— from staff file requirements to the 7 most common audit failures.

3,000+ licences revoked in 2025

470+ care providers lost their licence 2022—2024

10 days to respond to a Home Office intent to revoke

Who this guide is for

Registered managers, HR leads, compliance officers, and care home owners who want to understand what CQC inspectors look for — and how to make sure your files, processes, and staff records are ready before they arrive.

Schedule 3: The 8 Categories Every Staff File Must Cover

Schedule 3 of the Health and Social Care Act sets out the evidence inspectors expect to find in every staff file. These are not optional. Missing any of these categories is a compliance failure.

The 8 Schedule 3 categories:

Category	What inspectors expect
☐ Proof of identity	Government-issued ID with photo, verified in person or via approved digital means.
☐ Professional registration	Verified directly with NMC, HCPC, SWE or other relevant body — not self-declared.
☐ Enhanced DBS	Must include Adult Barred List check. No older than 12 months at start of employment.
☐ Conduct in previous employment	Verified directly with former employers — not just a written reference. Contact attempts must be logged.
☐ Why previous care employment ended	Required where the previous role involved children or vulnerable adults.
☐ Qualifications	Verified with the issuing body where reasonably practicable.
☐ Full employment history	No unexplained gaps. Every gap must have a signed written explanation from the candidate.
☐ Health information	Collected after conditional offer, in line with Equality Act 2010\.

The Lifted compliance standard goes further

Lifted designs its internal threshold to meet or exceed both Home Office and CQC requirements. Where CQC requires 2 references, Lifted requires 2 professional + 1 character. Employment history is captured from age 16 with every gap signed by the candidate. Address history covers a minimum of 5 years. For overseas workers, police clearance covering the previous 5 years is obtained.

What CQC Inspectors Are Looking For

CQC inspections under the 2026 framework are more structured and evidence-based than ever. Inspectors are not just assessing care quality — they are specifically examining whether your organisation can demonstrate safe, compliant workforce management. That means your staff files, your recruitment processes, and your immigration compliance are all in scope.

The inspection framework focuses on five key questions about your service:

- ▶ **Safe** — Is it Safe?
- ▶ **Effective** — Is it Effective?
- ▶ **Caring** — Is it Caring?
- ▶ **Responsive** — Is it Responsive?
- ▶ **Well-led** — Is it Well-led?

For workforce and compliance purposes, the Safe and Well-led questions carry the most weight. Safe covers your recruitment checks, right-to-work processes, and DBS verification. Well-led covers your systems for managing staff compliance, record-keeping, and how you respond when things go wrong.

Right-to-Work Checks — What You Must Get Right

Right-to-work checks are one of the most common areas of non-compliance found during CQC inspections and Home Office audits. The rules are specific and non-negotiable. Critically, checks must be carried out in the prescribed manner — for the vast majority of workers this means conducting an online check using the worker's share code via the Home Office online checking service. Manual checks of Biometric Residence Permits (BRPs) are no longer permitted. It is also not sufficient to simply view a worker's e-visa — a formal online right-to-work check using a share code must be completed and recorded.

Every right-to-work check must be:

- Completed online via the Home Office right-to-work checking service using the worker's share code — this is the prescribed method for all workers with a biometric or e-visa. Manual BRP checks are no longer valid
- Dated — and the date must be before the worker starts on that visa or employment status
- In your company's name — checks carried out by a previous employer or agency do not count
- Repeated after each visa renewal — a check carried out at the start of employment is not valid for the duration of sponsorship

Common right-to-work mistakes:

- People working 20 hours at your organisation must be sponsored elsewhere and working their full contracted hours there — you must have evidence to prove this
- Students must stick to their permitted hours — exceeding these is an illegal working breach
- Share code checks must be completed via the Home Office online service and dated correctly — an expired or incorrectly recorded check is treated as no check at all. Simply viewing a worker's e-visa on their phone or device does not constitute a valid right-to-work check. Manual checks of Biometric Residence Permits are no longer an accepted method

The 7 Things That Fail Audits

Based on real CQC enforcement patterns and Home Office compliance actions, these are the most common reasons care providers fail audits. If any of these apply to your organisation, they need to be resolved before an inspection.

1. Missing or unverified references. References not verified directly with the employer — written references alone are not sufficient
2. DBS out of date. DBS check is more than 12 months old at the worker's start date with you — not their previous employer
3. Unexplained employment gaps. Gaps in employment history have no written explanation signed by the candidate
4. Missing reason for leaving previous care employment. No evidence of why the previous care role ended — required for roles involving vulnerable adults
5. Unverified qualifications. Qualifications have not been verified with the issuing body where practicable
6. No verification audit trail. No audit trail showing who verified each document, when, and by what method
7. Reconstructed files. Files have been assembled after the fact with no contemporaneous decision trail — inspectors are trained to spot this

Important: Auditors are trained to spot retrospective fabrication

Backdating only works when the audit trail is genuine. If you discover a gap in a staff file, the correct approach is to acknowledge it, risk-assess it, remediate it, document everything with a timeline, and have a compliance officer sign off. Do not attempt to backfill without a clear contemporaneous record.

Sponsored Worker Compliance

— Additional Requirements

If your organisation employs sponsored workers, you have additional duties on top of standard CQC requirements. These apply from April 2026 onwards and reflect the Home Office's significantly increased enforcement activity in the care sector.

Payroll compliance — the April 2026 change

From April 2026, HMRC submits live payroll data directly to UKVI. Salary discrepancies are now flagged automatically every pay period — not just during audits. Every sponsored worker's actual pay must match their Certificate of Sponsorship at all times. This includes:

- Pay at or above £12.82/hour and £25,000/year for care workers and home carers
- Pay at or above £25,000-38,700/year for senior care and nursing roles depending on shortage status
- Any overtime, top-up payments, or deductions must be correctly reflected in Full Payment Submissions
- Three new data items on Full Payment Submission (FPS) and two on Employer Payment Summary (EPS) must now be reported

SMS reporting duties

You must report the following changes to UKVI within 10 working days via your Sponsor Management System:

- Any change to a sponsored worker's job title, hours, or salary
- Absence without pay of more than 4 weeks
- A worker leaving your employment for any reason
- Any significant changes to the work location

New legal requirement: employment rights documentation

From 6 March 2026, sponsors must provide every sponsored worker with written information about their UK employment rights. This must cover: National Minimum Wage, Working Time Regulations, Pension auto-enrolment, Statutory leave and pay, Health and safety rights, Trade union membership, Equality Act duties, and how to raise grievances. This evidence must be retained under Appendix D of the sponsor licence guidance and will be checked during compliance visits. Best practice is a signed sponsorship agreement that each worker receives and acknowledges.

The 5-Step Remediation Playbook

When you find a compliance gap — and you will find one — this is the correct way to handle it. The worst thing you can do is ignore it or attempt to paper over it. The second worst thing is to remediate it without creating a proper contemporaneous record.

01

Acknowledge

Do not paper over it. Note the gap and the date you found it. Create a written record immediately.

02

Risk-assess

Can the worker continue safely in their role? Document your reasoning in writing. This becomes part of the audit trail.

03

Remediate

Obtain the missing document or carry out the alternative check. If the original cannot be retrieved, document why and what alternative action was taken.

04

Document

Create a full written record: timeline of the gap, risk assessment, actions taken, and outcome. All in one place.

05

Sign off

An authorised compliance officer signs and dates the completed file. The sign-off itself is evidence of good governance.

Your Pre-Inspection Checklist

Run this checklist on every staff file before your next inspection. If you can tick every item, you are in a strong position. If you find gaps, use the 5-step remediation playbook in Section 6.

For all staff

Check	Notes
☐ Passport or government ID	Verified original or certified copy. Appearance confirmed in person or via approved digital method.
☐ Right-to-work check	Completed via share code or document check. Signed, dated, before start date.
☐ Enhanced DBS with Adult Barred List	No older than 12 months at start of employment.
☐ 2 professional references \+ 1 character	All verified directly. Contact attempts logged for any that did not respond.
☐ Full employment history	No unexplained gaps from age 16\ . Every gap has a signed written explanation.
☐ Reason for leaving previous care role	Required where previous role involved vulnerable adults or children.
☐ Qualifications verified	Verified with issuing body where reasonably practicable.
☐ Health declaration	Collected post conditional offer, in line with Equality Act 2010\ .
☐ Proof of current UK address	Within 3 months.
☐ NI number documented	From an acceptable source — payslip, P45, HMRC letter.
☐ Signed employment contract on file	Including offer letter if applicable.
☐ Pre-employment RTW check dated before contract start date	The initial right-to-work check must be completed and dated before the sponsored worker's contract start date to ensure that they are in the UK on a valid visa.
☐ Post-employment RTW check dated after contract start date	For sponsored workers, a follow-up right-to-work check must be carried out after the contract start date to confirm the worker has entered employment and is working under the terms of their current visa.
☐ Decision audit trail	Who verified each document, when, and by what method.

Additional checks for sponsored workers

Check		Notes
☐	CoS details on file	Certificate of Sponsorship reference, assigned date, and conditions.
☐	Entry date verification	Confirmed against visa vignette or BRP.
☐	Pay matches CoS	Actual pay and hours match Certificate of Sponsorship at all times.
☐	Rostering matches CoS hours	Worker is not rostered below contracted sponsored hours.
☐	SMS reporting up to date	All changes reported within 10 working days.
☐	Recruitment decision trail	Evidence of why this worker was selected including advertising and shortlisting.
☐	Bank transfer evidence	Payslips and bank transfer records showing worker's name on payments.

About lifted

Not sure where your compliance actually stands?

Lifted is a regulated immigration advisor (OISC) and workforce compliance platform built exclusively for UK care providers. We help 500+ care providers stay Home Office and CQC compliant through a combination of purpose-built technology and a hands-on team of registered immigration advisors.

Our Immigration Compliance Audit gives you a clear, written picture of exactly where your sponsored workforce compliance stands — what is in order, what needs fixing, and in what priority order. No obligation to take further action.

If you are in the West Midlands, Lifted is directly commissioned by the West Midlands to support care providers in your region. The cost of your audit may be covered by local authority funding.

Book a free audit consultation

liftedcare.com/audit | hello@liftedcare.com

Lifted is OISC regulated. Everything we do meets the highest standards of immigration law compliance.