



Shape the future
with confidence

Global Immigration alert

April 2026

The better the question. The better the answer.
The better the world works.

United Kingdom

UK sponsor update: New right-to-work requirements and higher visa fees

Executive summary

Between 6 March and 8 April 2026, the UK Home Office introduced a series of updates to sponsor guidance that significantly expand right to work obligations, replace the longstanding “genuine vacancy” test with a new “eligible role” framework, and strengthen sponsor compliance and record-keeping expectations. In parallel, most UK visa application fees increased by approximately 6.5% to 7% from 8 April 2026, raising the overall cost of UK immigration for employers and individuals.

Background

The Home Office regularly updates sponsor guidance to reflect evolving immigration policy, enforcement priorities and compliance expectations. The March and April 2026 changes form part of a broader shift toward enhanced sponsor accountability, preventative compliance monitoring and closer scrutiny of employment practices. Separately, routine fee increases have now taken effect across a range of UK work, visitor and settlement routes.

Key developments

The updates introduced during this period include:

- *Expanded right to work check obligations (effective 8 April 2026).* Sponsor guidance has been amended to clarify that sponsors must confirm, before any work starts, that any worker they wish to sponsor, and any worker they otherwise directly employ or engage, has valid permission to enter or remain in the UK and is permitted to carry out the work in question. The revised wording separates sponsorship obligations from wider employment or engagement arrangements. This expands sponsor responsibility to cover directly engaged workers who are not sponsored, including individuals who may hold independent permission to work in the UK, reinforcing expectations of comprehensive right to work oversight.
- *“Genuine vacancy” replaced by “eligible role” (effective 6 March 2026).* The Home Office has replaced the

genuine vacancy requirement with a new “eligible role” concept. An eligible role must:

- Exist at the point a Certificate of Sponsorship (CoS) is assigned, or be reasonably expected to exist
- Require the sponsored worker to perform the duties, responsibilities and weekly hours stated on the CoS
- Meet all route specific requirements, including minimum skill and salary thresholds, with ongoing compliance with the National Minimum Wage Act and Working Time Regulations
- Align with the sponsor’s business model, business plan and scale for the full duration of sponsorship

This change signals a move away from a one-off assessment toward an expectation of ongoing role integrity and alignment.

- *New duty to provide information on UK employment rights (effective 6 March 2026).* Sponsors must now provide all sponsored workers with information about their UK employment rights and retain evidence confirming this has been done as part of mandatory sponsor records under Appendix D of the Home Office Sponsor Guidance. Acceptable evidence may include written materials, such as contracts or induction packs, copies of guidance provided, or records of briefings or training sessions. This requirement also applies to existing sponsored populations.
- *Increased emphasis on sponsor awareness and compliance enforcement.* Updated guidance reiterates that sponsors are expected to read, understand and keep up to date with all aspects of sponsor guidance. The Home Office has also clarified that compliance action may be taken on the basis of reasonable suspicion, rather than conclusive proof of non-compliance. Sponsors are therefore expected to maintain robust HR processes, clear audit trails and accurate, consistent records to demonstrate ongoing compliance.

- *Payroll and salary requirements.* Updated sponsor guidance introduces a new salary compliance framework assessed by pay frequency, requiring the required salary to be met in each rolling period. Any shortfall, even if later corrected, may constitute a breach. Sponsors must document variable working patterns on the CoS and report changes where required. Increased enforcement, including license suspension or revocation, may follow where underpayment is identified, with salary compliance subject to ongoing Home Office and HMRC monitoring.
- *Increase in UK visa application fees (effective 8 April 2026).* Most UK visa application fees increased by approximately 6.5% to 7%, including:
 - *Work visas outside the UK:* (a) Skilled Worker or Global Business Mobility (GBM), CoS of three years or less: GBP 769 to GBP 819; (b) Skilled Worker or GBM, CoS longer than three years: GBP 1,519 to GBP 1,618
 - *Work visas inside the UK:* (a) Skilled Worker or GBM, CoS of three years or less: GBP 885 to GBP 943; (b) Skilled Worker or GBM, CoS longer than three years: GBP 1,751 to GBP 1,865
 - *Settlement:* Indefinite leave to remain (ILR): GBP 3,029 to GBP 3,226
 - *Visitor visas:* (a) Up to six months: GBP 127 to GBP 135; (b) Long-term, two years: GBP 475 to GBP 506; (c) Long-term, five years: GBP 848 to GBP 903; (d) Long-term, 10 years: GBP 1,059 to GBP 1,128

Impact on employers

Taken together, these developments increase both compliance exposure and cost pressures for UK sponsors:

- Right to work checks must be consistently conducted and evidenced for all sponsored and directly engaged workers.
- The eligible role framework requires closer, ongoing alignment between job design, CoS content and business operations.
- Enhanced record keeping obligations increase the importance of structured onboarding, training and payroll governance.
- The reasonable suspicion standard heightens the risk of earlier Home Office intervention where controls are weak or documentation is incomplete.
- Visa fee increases may affect international hiring budgets, approval thresholds and workforce planning.

Key steps for sponsors

Sponsors may consider the following actions in response to the recent changes:

- Review and update right to work checking processes to ensure coverage of all sponsored and directly engaged workers.
- Align role design, job descriptions and CoS content with the new eligible role requirements.
- Introduce or refresh materials provided to sponsored workers on UK employment rights and retain evidence of delivery.
- Conduct internal audits of Appendix D sponsor guidance records, payroll alignment and right to work documentation.
- Factor revised visa fees into mobility cost forecasts and hiring budgets.

Key steps

EY will continue to monitor these developments. Should you have any questions, we encourage you to contact one of our immigration professionals.

EY is building a better working world by creating new value for clients, people, society and the planet, while building trust in capital markets.

Enabled by data, AI and advanced technology, EY teams help clients shape the future with confidence and develop answers for the most pressing issues of today and tomorrow.

EY teams work across a full spectrum of services in assurance, consulting, tax, strategy and transactions. Fueled by sector insights, a globally connected, multi-disciplinary network and diverse ecosystem partners, EY teams can provide services in more than 150 countries and territories.

All in to shape the future with confidence.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. EY member firms do not practice law where prohibited by local laws. For more information about our organization, please visit ey.com.

© 2026 EYGM Limited.
All Rights Reserved.

EYG no. 002945-26GbI

2101-3682263
ED None

This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax, legal or other professional advice. Please refer to your advisors for specific advice.

ey.com

Seema Farazi, Partner
Global Immigration
+ 44 207 951 7122
seema.farazi@uk.ey.com

Denise Isaacs, Partner
Global Immigration
+44 207 980 9244
disaacs@uk.ey.com

Lisa Amos, Partner
Global Immigration
+ 44 207 197 0817
lisa.amos@uk.ey.com

Anthony Michael, Partner
Global Immigration
44 207 760 9413
anthony.michael@uk.ey.com

Nikita Potdar, Director
Global Immigration
+44 20 7760 8208
nikita.potdar@uk.ey.com

Kellie Sullivan, Director
Global Immigration
+ 44 207 806 9707
kellie.sullivan1@uk.ey.com

Caitlin Graham, Director
Global Immigration
+44 207 760 9332
cgraham2@uk.ey.com

Vicky Cregan, Partner
Global Immigration
+44 20 7951 1897
vcregan@uk.ey.com