

HMRC and the minimum wage: more questions than answers

Published: January 13, 2026, 10:02 pm

HMRC has [published a list of minimum wage offenders this morning](#). It has responsibility for policing enforcement of the minimum wage on behalf of the Department for Business, Innovation and Skills.

This list poses more questions than answers. The first, and obvious question, is why it has received relatively little attention in the press. There are stories, but I have seen nothing like the level of interest that HMRC's list of top tax evaders attracted and yet in a very real way the abuse of the minimum wage is at least as significant in imposing real cost on both individuals and society at large.

Second, there has to be real doubt about how this list was chosen. As the BBC note, one Premier League football club was apparently found guilty of abuse of the minimum wage last year and had to pay £27,500 in wages as a result, split between 3,000 people. You could, of course, argue as a consequence that this means that each worker only benefited by about £9 and as a result that this settlement falls into the 'insignificant' category but one of the employees named by HMRC did in fact underpay £149 split between 15 workers, or under £10 each. In that context the Premier League football club was of much more interest, but was not named. Why was that?

And why is it that a settlement of £149 is apparently enough to put you in the top 25 worst offenders of minimum wage? Does that imply that HMRC is simply not doing enough? Or is it that it does not have enough resource? Or is it that despite promises made last year this years budget for tackling minimum wage abuse has, I am reliably informed, gone down by 3%?

The one thing I can say with considerable confidence is that it is not because there are no cases to find. Abuse of the minimum wage amongst outsourced workers is notorious and whilst one, recent, case will undoubtedly help them when it comes to payment for travelling time I'm sure that there is much to do in this area, and yet there was no mention of any sort of such employees or their employers in the list published. Again, why was that when this is so well-known as an area for abuse? Is HMRC turning a blind eye, or have they been told not to embarrass the privatisation of outsourcing process

by drawing attention to the fact that this is only viable when workers are exploited?

The minimum wage is a vital part of the attack on poverty. It is, of course, too low: we all know that it should be raised to the level of a living wage, but whichever level it is set at it is vital that sufficient resources are dedicated to ensuring that it is paid, and that the right abusers are named if that is considered to have an appropriate deterrent effect. Letting off large employers, and those that might be conflicted by political preference indicate a system that is not being run equitably and that is an affront to the whole spirit of the minimum wage. It also confirms what so many small and medium-size enterprises think, which is that HMRC is set against them.

As on so many other issues, HMRC have got to do better. Right now there are no signs that it will.