

OFFICE OF THE  
IMMIGRATION SERVICES  
COMMISSIONER



# Annual Report and Accounts 2020/21



Incorporating the Commissioner's report on  
regulation by the Designated Professional Bodies  
of their members



# Office of the Immigration Services Commissioner Annual Report and Accounts

1 April 2020 to 31 March 2021

Incorporating the Commissioner's  
report on regulation by the  
Designated Professional Bodies  
of their members

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paragraph 21(3) of Schedule 5 to the Immigration and  
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# Part 1: Performance Report

## 1.1 Overview

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**This overview provides information on the Office of the Immigration Services Commissioner (OISC), including our purpose and activities, the key risks against achieving our objectives and a summary of our performance for 2020/21.**

### 1.1.1 Commissioner's statement

*The last 12 months have been a truly unique period for OISC as it has for the entire country in battling COVID-19. This has necessitated the organisation working from home for the year and there is further detail in this report of the impact and measures that have been adopted. I would though wish to express my appreciation and admiration for the way in which the OISC staff have risen to the challenges of the pandemic. Not only have all our routine services and functions continued but, in many areas, innovation and fresh thinking has resulted in new on-line processes that are a distinct improvement and will certainly be retained for the future.*

*Our Business Plan objectives have been met with only a few areas being adversely affected by the pandemic. Most significant in this respect has been the slowing down of processes within the courts preventing prosecutions proceeding.*

*The year has also been the first one in which our new Vision and Corporate Plan 2020-2023 has been approved by Ministers and started to take effect. The shift of emphasis in the vision to put the advice seeker or migrant at the heart of our work has meant a fundamental change in the way we think, plan and deliver our services. There is now a major organisational change programme which over the next two years will transform the way we operate. Fundamental to this new approach will be our adoption of three Regional Teams in April 2022 that will deliver compliance and enforcement activities within three regions of the United Kingdom, alongside a much greater emphasis on engaging with the local communities, advisers as well as advice seekers themselves. Much planning has already gone into this programme despite the pandemic. I am hopeful we can use 2021 with some lessening of COVID-19 restrictions as a preparation period for going live with Regional Teams next year.*

*Financially, this last year has been especially challenging and has illustrated that the last few years of flat cash allocations of Grant-in-aid with no increases, has now resulted in huge pressures on the OISC budget. I have agreed with the Home Office that we need to review the funding basis for the OISC and where alignment with HM Treasury requirements and other regulators could provide a more sustainable and robust basis. This work will hopefully proceed in 2021.*

*A significant event of the future is that our tenancy of offices in Bloomsbury Street will come to an end on 7 November 2022. Like many others we have shown that working from home is perfectly feasible for our work, and the intention is that as part of our transformation programme, we become a totally working from home organisation with minimal requirement for permanent office space. We will continue to use 21 Bloomsbury Street as we can this coming year but staff will not be returning to full time office-based working as in previous years.*

*2020/21 has seen us start to engage with external organisations and bodies. Ironically, the pandemic restrictions on travel have necessitated using online processes which can offer greater opportunities than occur when people travel to meet each other. Our relations with the Home Office now include regular dialogues on a range of policy and operational issues and we have continued discussions with other regulators in the sector, notably the Solicitors Regulation Authority and the Bar Standards Board. Our whole communications and engagement functions are starting to develop and expand their range of contacts and content.*

*In February 2021 Dr Ian Leigh retired as Deputy Commissioner. His contribution to the OISC over some 10 years has been highly significant, especially in leading OISC for nearly four years when no Commissioner was appointed. For the moment it has been decided not to appoint a new Deputy Commissioner and adjustments have been made to the responsibilities of senior executives to mitigate this.*

*2021/22 will bring OISC many new challenges. As the pandemic restrictions hopefully are relaxed, the one aspect everyone looks forward to is to be able to meet people face to face again and pursue those aspects of business that undoubtedly require people to be physically present with each other. I end by again paying tribute to OISC staff. It is their efforts and motivation levels which have remained consistently high throughout the year, that have enabled OISC to achieve so much in this turbulent year.*

*J. F. Tuckett*

John Tuckett  
Immigration Services Commissioner



### 1.1.2 About the Office of the Immigration Services Commissioner

Led by the Immigration Services Commissioner, the OISC is an Arm's Length Body of the Home Office. Our statutory duties are set by the Immigration and Asylum Act 1999 and include regulating immigration advice and services across the UK<sup>1</sup>. We are funded through a Grant-in-aid budget of £4.388m to carry out our statutory regulatory responsibilities with 61 employees and based in London. We regulate over 3,000 individual immigration advisers and 1,600 organisations from which we collected fees of £1m in 2020/21 which were remitted to the Home Office.

The Immigration Services Commissioner acts as Corporation Sole and Accounting Officer and is accountable to the Home Secretary for the OISC's activities and performance. The Commissioner is supported by an Audit, Risk and Assurance Committee (ARAC), the Deputy Commissioner and a senior management team.

Our Home Office Senior Sponsor is the Deputy Director for Human Rights & Family Unit within the Migration and Borders Group, who is responsible for the policy and legal framework within which the OISC works. Our relationship with the Home Office is defined by a Framework Agreement, which includes details on accountability, governance, finance and reporting arrangements. These matters are overseen by the Home Office Sponsorship Unit (HOSU).

### 1.1.3 Our purpose and core activities

The OISC fulfils its statutory duties as set out in the Immigration and Asylum Act 1999 by promoting good practice to immigration advisers, setting standards for immigration advice and services, and making sure those standards are upheld. Specifically, it includes:

- assessing and registering those who want to provide immigration advice against OISC levels of competence (Level 1, 2 and 3)
- auditing the performance of organisations and advisers ensuring standards are maintained
- managing and investigating complaints against immigration advisers
- investigating and taking enforcement action against those who provide poor service or immigration advice illegally
- overseeing those who regulate immigration advice by solicitors and barristers in Scotland and Northern Ireland where the legal systems are different.

### 1.1.4 Our key risks and issues

We are committed to applying risk management to all our activities to enable the identification, prioritisation and escalation of strategic and operational risks and issues. During 2020/21, three principal risks which had the potential to impact on our success in delivering our strategic objectives were identified and managed:

**Financial:** Assumptions used to set the 2020/21 budget proved unfounded, and/or unplanned-for costs rise during the financial year

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<sup>1</sup> Advice provided by solicitors and barristers falls outside of OISC's authority and is regulated by the Solicitors Regulation Authority and the Bar Standards Board

**Financial:** The spending review does not result in the monies bid for in support of the Development Programme and/or Grant-in-aid being maintained at current levels

**COVID-19:** Key OISC operational practices are reduced or stopped during 2020/21 as COVID-19 restrictions and uncertainties continue to affect ways of working

More about these and other organisational risks can be found on pages 26-27.

### 1.1.5 Going concern statement

Our accounts have been prepared on a going concern basis with the future financing of the OISC's liabilities to be met by Grant-in-aid funding, to be approved annually by Parliament. Approval for amounts required for 2021/22 has been given and there is no reason to believe future approvals will not be forthcoming.

The OISC has been established by the Immigration and Asylum Act 1999 and the Triennial Review into the OISC (published January 2017) confirmed that there was a continued need for regulation of immigration advice and services and that the OISC should continue to provide this as a non-departmental public body.

Our future cash flow projection is adequate to cover liabilities as they fall due for a period of 12 months after date of certification by the Comptroller and Auditor General. In 2022/23 financial year, the OISC offices lease in 21 Bloomsbury Street will expire on 7 November 2022. The funding for the dilapidation and other exit cost is yet to be formally agreed with the Home Office.

## 1.2 Performance summary: Delivery against our business plan

### 1.2.1 Strategic aims and objectives

Our Corporate Plan sets six strategic objectives that will enable us to deliver our vision:

<b>Promote</b>	Ensure advice seekers and those around them know how and why to access advice from a regulated adviser
<b>Collaborate</b>	We will collaborate with others to create a system that is transparent and easy for the advice seeker to understand and navigate
<b>Regulate</b>	Create a world class advisory system where good practice is the norm for all OISC regulated immigration advisers
<b>Protect</b>	Protect advice seekers, taking action against poor advice, exploitation and criminal activities
<b>Develop</b>	Reform the OISC into a modern and engaging organisation, geared to meet the needs of advice seekers in the 2020s
<b>Enable</b>	Provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value

Through our 2020/21 Business Plan we set out a programme of activities in support of our six objectives. Performance against these objectives are measured on a quarterly basis through the senior management team and Audit and Risk Assurance Committee. The following section provides a summary of our performance against these objectives in 2020/21.

## 1.2.2 Performance summary

**751**

new adviser applications decided, including regulated individuals applying to raise levels

**55%**

of new organisation applications decided in under 16 weeks

**100%**

of Commissioner's decisions upheld on appeal

**8**

applications to provide support for EU Settlement Scheme

**73%**

of new organisation applications decided within six months

**67**

complaints against regulated advisers received

**122**

new organisation applications approved

**6**

organisations' registration cancelled, or refused continued registration

**£25k**

fees recovered on behalf of clients

**1,077**

continued registrations approved

**236**

premises audits completed

**8**

criminal prosecutions awaiting trial

**11**

Competency assessment events held

**8**

organisations appealed against a negative decision

**8**

people convicted

**774**

applicants attended assessment centres

**368**

Applicants passed the competence assessment

**64**

investigations into complaints of illegal activity completed

## Promote

Through our promote activities we increased awareness of the OISC and its responsibilities amongst our stakeholders by better understanding our stakeholders and delivering communication and engagement activities. We undertook research into UK Immigration trends which has informed our understanding of where immigration advisers are needed within the UK. We have mapped our external stakeholders identifying opportunities for greater collaboration where our agendas coincide. A new communications and engagement strategy has been developed which will underpin our future activities as we develop regional teams. Work on identity guidelines and branding has been limited due to budget and COVID-19 restrictions but will be taken forward next year. We have run a number of campaigns (including posters and videos) aimed at improving understanding of how quality immigration advice can be accessed and the dangers of using unregulated advisers.

## Collaborate

We have continued to build and energise our relationships with partners and stakeholders, notably other regulators (Solicitors Regulation Authority, Bar Standards Board, Chartered Institute of Legal Executives) and agencies such as the Legal Services Board, despite the physical limitations of COVID-19 restrictions. We have taken forward discussions on the implementation of the Competition and Markets Authority review of Legal Services and Stephen Mason's Independent Review of Legal Services, both of which could have profound implications for the OISC in the future depending upon what recommendations are accepted.

We have worked closely with the Home Office and now have a much better and regular exchange of immigration information. Home Office awareness of the work of the OISC is higher than it has been for many years and OISC staff are now regularly engaged in discussing immigration policy issues with officials. In particular the importance of good immigration advice for migrants at the start of their application journey through the overall immigration system is now recognised, enabling a more integrated approach.

## Impact of COVID-19 (Promote and Collaborate)

COVID-19 restrictions have meant that some planned engagement activities requiring face-to-face contact were put on hold in 2020/21. However, this has been mitigated by utilising new opportunities for on-line conferences and meetings. Additionally, we have given greater emphasis to developing social media activities and electronic channels to communicate with advice seekers and EUSS (European Union Settlement Scheme) applicants, as well as advisers and stakeholders.

## Regulate

Through our regulate objective in 2020/21 we:

- ensured those who wish to work as an immigration adviser have the right skills and knowledge through a formal competence assessment prior to being accepted into the scheme
- through risk-based audits, ensured advisers are complying with OISC standards and providing a quality service to advice seekers.
- supported advisers so that they develop professionally and improve the

quality of their service.

In 2020/21 we received 151 applications from previously unregulated organisations, of which 122 organisations were approved. This included eight applications to provide immigration advice and services related to the Home Office EUSS. By comparison in 2019/20, a total of 209 applications were received including 56 under the EUSS scheme. 181 were approved including all 56 EUSS applications.

We approved a total of 603 applications for new advisers joining an existing registered organisation. (505 in 2019/20). This was made up of 136 brought forward from 2019/20 and 467 applications for new advisers to join an existing registered organisation.

We received 1,087 applications from regulated organisations for continued registration, of which, 1,077 applications were approved (1,047 received in 2019/20, 1,033 approved).

The above figures suggest that there had been a slight increase in both applications and approvals for registered organisations and individual advisers.

We held 11 on-line competency assessment events. Of the 774 applicants, 368 applicants passed. In 2019/20, 642 applicants attended 19 assessment centres with 304 passing. This would suggest the new on-line processes are an efficient and effective way of carrying out these assessments.

We completed 236 organisational audits compared to 264 in 2019/20. This reduction was due to COVID-19 restrictions preventing OISC staff visiting adviser premises. On-line audits were developed and have proved effective. Only one organisation audited had two or more serious breaches within two years of their initial registration. Six organisations had their registrations cancelled or were refused continued registration on the basis of a lack of fitness or competence.

Our advisers are supported by our team of OISC caseworkers, who provide individual advice and guidance when needed. In addition to ensuring all advice seekers can access an OISC adviser, we continue to work with the Community and Voluntary sector and support them to complete the OISC application process.

### Impact of COVID-19

Restrictions on travel and social distancing requirements had a significant impact on how we were able to carry out our regulatory work. We were unable to run competency assessments centres or undertake in person premises audits. Whilst this impacted our activity in the first and second quarter of the year, through introducing online competency assessments in September and undertaking remote audits we were able to overcome these challenges.

Our Business Plan objectives were achieved with the exception of 80% of Level 1 applications being decided within four months, where 53% were decided within 4 months and 73% within 6 months. This was due to no competency assessments taking place between April and September, and also applicants needing greater

flexibility due to illness, travel and work restrictions. However, the total number of assessments decided in the year exceeded that achieved in 2019/20.

The changes that have been put in place are working effectively and are more efficient than historical processes. We will continue to use these in both online audits and competency assessments next year when COVID-19 requirements relax.

## Protect

Through the protect objective we:

- identified poor advice and services or unlawful activity and act in the interest of the complainant
- investigated and where appropriate take enforcement action against those who provide unlawful immigration advice and services

In 2020/21 we received 67 complaints against regulated advisers compared to 113 received in the previous business year, 83% of which were resolved within five months compared to 87% resolved in (2019/20). In 2020/21 45 (67%) complaints were resolved in favour of the complainant. Whilst we do not have statutory powers or authority to force an organisation to refund fees to a client, in 2020/21 we secured 11 refunds totalling £25,211.

We received 64 complaints against unregulated immigration advisers (45 Section 91 offences (providing unlawful immigration advice) and 19 Section 92B offences (advertising unlawful immigration advice). 48 were taken forward for formal investigation compared to 87 received in 2019/20.

We secured eight convictions were secured in 2020/21 all of whom received custodial or community sentences. Six of those convicted were also ordered to repay fees and or compensation towards their victims. A further eight are awaiting trial as at 31 March 2021. This is compared to seven convictions secured in 2019/20.

In addition:

- 16 unlawful websites were closed/changed
- three unregistered organisations were investigated and then applied for OISC registration
- eight Interventions – activity stopped\*
- six reprimands were given\*\*
- one Civil remedy pursued\*\*\*
- Nil simple cautions applied (3 pending but cannot be administered due to COVID-19) \*\*\*\*
- 12 new prosecutions files awaiting review

\* Letter sent to unregulated advisers warning them of potential Section 91/92B offences

\*\* Official letter issued regarding unlawful activity, recorded on file, and can be used for any future prosecutions

\*\*\* Complainant is advised to seek remedy through the Civil Courts

\*\*\*\* Simple caution as used by the Police



## Impact of COVID-19

Access to courts was the most significant impact of COVID-19 with cases both at Magistrates and Crown courts delayed. This will have an ongoing impact into 2021/22.

Both our work on complaints and criminal investigations were affected by COVID-19. Reduced access to advisers' case files caused delays in processing complaints. There were similar issues with interviewing witnesses and those being investigated. These were overcome to some extent by the introduction of a new process for conducting remote on-line interviews with witnesses.

## Develop

In 2020/21 we published our new Corporate Plan (2020-2023) which establishes a new vision for the OISC that every person seeking immigration advice in the UK

- Makes an informed choice to seek advice only from a regulated immigration adviser
- Receives reliable and professional advice and service that they can have confidence and trust in

In 2020/21 we established a new development programme, designed to transform the OISC. At the heart of this is a new organisational construct of regional and national teams all working remotely. Three regional teams will provide operational frontline services on a local basis enabling improved awareness of advice seekers' needs and how these can be met, better engagement with local stakeholders, and improving the quality of services provided by immigration advisers and will look to implement this in 2021/22. We have established a programme board with formal programme and project management processes to ensure the overall aims are delivered.

## Enable

To support our regulatory, enforcement and engagement work our corporate services have continued to support the organisation. In 2020/21 we have ensured our staff have the help they need whilst working in a new environment due to COVID-19. We continued to maintain our IT systems with an uptime of 99.9%. Our financial statements continue to be produced in line with Government's financial reporting guidance, and we continue to monitor performance and risk and have introduced a new approach to corporate risk management in line with best practice standards. We have achieved 93% staff retention rate, introduced a talent management strategy and plan, and implemented a revised performance and appraisal framework. We responded to all freedom of information and subject access requests within the required timeframes. We commenced a website review, refreshing content. We also produced a new social media strategy and internal communications strategy and implementation plan.

## Impact of COVID-19

COVID-19 restrictions have impacted the way we work and also the morale and



wellbeing of staff. In March 2020 we moved all staff to working from home with access to our office limited to urgent business requirements only. This has remained in place throughout 2020/21 and there has been minimal impact on our ability to carry out our work. We have ensured all staff have the right equipment they need to work from home. In addition, we launched a staff wellbeing initiative OISConnect, to provide more social interactions and trained four new mental health first aiders.

As a result of COVID-19, the OISC expenditure increased by £193,815. Staff pay increased by £105,501, due to an increase in the holiday pay accrual, increased responsibilities and temporary promotions. There was minimal departure of staff and no consequential vacancies, as opposed to the historical figure of 90% occupancy. Other unbudgeted expenditure in supporting staff working from home in line with Government requirements amounted to £88,314. Supplementary Grant-in-Aid was provided by the Home Office. There were, however, a reduction in travel and subsistence and scanning costs.

### EU Settlement Scheme (EUSS)

The OISC was granted £14k from the Home Office EU Exit communications fund. This was used to develop an OISC video to promote the EUSS and the importance of regulated immigration advice. This video was published on social media and shared with stakeholders.

### 1.2.3 Business Impact Target 13 December 2019 -12 December 2020

The Immigration Services Commissioner is a 'relevant regulator' for the purposes of section 22 of the Small Business, Enterprise and Employment Act 2015 and brings the OISC within the scope of the Regulators' Code. During the Business Impact Target reporting period 13 December 2019 to 12 December 2020, we have made no changes to our processes that met the qualifying threshold for submission as a Qualifying Regulatory Provision.

### **1.3 The Commissioner's Report on Regulation by the Designated Professional Bodies of their members**

**This report, which is made in accordance with Part V of the Immigration and Asylum Act 1999, provides the Commissioner's opinion on the extent to which the Designated Professional Bodies (DPBs) have provided effective regulation of their members in the provision of immigration advice and/ or services. The DPBs are the Law Society of Northern Ireland, the General Council of the Bar of Northern Ireland, the Law Society of Scotland and the Faculty of Advocates.**

### The Law Society of Northern Ireland

The Law Society of Northern Ireland (the Society (NI)) continues with its focus on immigration, with its Immigration Practitioners Group meeting remotely online and planning its immigration conference.

The Society (NI) is currently awaiting the full enactment of the Legal Complaints and Regulation Act (NI) 2016 and are hopeful that secondary legislation will be introduced in the forthcoming year.

Currently one complaint is under investigation that was not referred by the OISC. The complaint relates to delays in lodging a visa application, failure to keep the client properly informed and acting contrary to the client's instructions. The client separately made an application to the Society's Professional Conduct Committee (PCC) seeking the repayment of monies paid to the solicitor and the PCC authorised the full return of the monies paid. There is also one ongoing matter before the Solicitors Disciplinary Tribunal which we will continue to follow.

During the year, the Society (NI) has also intervened in a practice that undertakes Immigration work and has liaised with other organisations to inform them of the intervention and to assist the immigration clients of the firm. The OISC will continue to monitor this situation.

### The General Council of the Bar of Northern Ireland

No complaints were received or were outstanding as at 31 March 2021 in respect of the Bar Council.

### The Law Society of Scotland

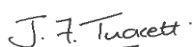
Liaison with the Law Society of Scotland (the Society (Scotland)), continues on immigration matters. The Society (Scotland) recently responded to Scottish Government's consultation on Amendments to Legal Complaints, and we will continue to monitor any outcome.

In 2020/21 the Society (Scotland) received two complaints from the Scottish Legal Complaints Commissioner (SLCC). These both were non OISC referral complaints and against the same solicitor. Both complaints concerned taking payments from the clients, not undertaking the work, and then not paying a refund. Both matters are still under investigation.

Three complaints were determined in the year. One of the complaints was closed due to lack of evidence, the second was against the wrong individual and the third was found to be factually incorrect. In addition, another complaint was closed, due to the death of the Solicitor.

### The Faculty of Advocates.

No immigration complaints were received or were outstanding in the year.



John Tuckett  
Immigration Services Commissioner and Accounting Officer  
7 July 2021

# Part 2: Accountability Report

# 2.1 Corporate governance report

## 2.1.1 Directors' Report

These financial statements report the results of the Office of the Immigration Services Commissioner (OISC) for the year 1 April 2020 to 31 March 2021 and incorporate the content required with a Directors' Report, as required by the Government Financial Reporting Manual (FRm). It has been prepared in accordance with the Accounts Direction given by the Secretary of State for the Home Department with the consent of HM Treasury, in accordance with Schedule 5 paragraph 20 (1 and 2) of the Immigration and Asylum Act 1999 (the Act).

### Commissioners

The OISC is led by the Immigration Services Commissioner, who is a Corporation Sole. The Commissioner is supported by a Deputy Commissioner. Both the Commissioner and the Deputy Commissioner are appointed by the Secretary of State (Home Secretary). Mr John Tuckett was appointed as Immigration Services Commissioner on 8 July 2019 for a period of five years.

On 5 February 2021, Dr Ian Leigh stepped down as Deputy Commissioner following the completion of his second five year term as Deputy Commissioner. The position of Deputy Commissioner is currently vacant in accordance with the provisions of the Immigration and Asylum Act 1999.

Details on salary and pension benefits for the Commissioner and Deputy Commissioner can be found in the Remuneration and Staff Report.

### Non-Executive Advisers

The Commissioner is supported by an Audit and Risk Assurance Committee (ARAC). Members are appointed by the Commissioner for a three year period with the option to extend for a further three. In March 2021 three members of ARAC were reappointed, with two members reappointed for a further three year term and one for a further two year period.

Member	Role	Appointment dates	Re Appointment dates
Simon Smith	ARAC Chair	January 2019 - December 2021	
Daniel Bunting	ARAC Member	April 2018 - March 2021	March 2021 – March 2023
Sue Gallone	ARAC Member	April 2018 - March 2021	March 2021 – March 2024
Jon Hayes	ARAC Member	April 2018 - March 2021	March 2021 – March 2024





















































































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