



Home Office

The Ethical Decision-Making Model

Version 2.0

A tool to help Home Office staff when making immigration decisions involving ethical issues.

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About this guidance

This guidance tells Migration and Borders decision-makers about the Ethical Decision-Making Model and how to use it.

Contacts

If you have any questions about the guidance and your line manager or senior caseworker cannot help you or you think that the guidance has factual errors, please email the Chief Casework Unit.

If you notice any formatting errors in this guidance (broken links, spelling mistakes and so on) or have any comments about the layout or navigability of the guidance then you can email the Guidance Review, Atlas and Forms team.

Publication

Below is information on when this version of the guidance was published:

- version **2.0**
- published for Home Office staff on **29 May 2025**

Changes from last version of this guidance

Updated narrative on using the Ethical Decision-making Model and updated details on escalation routes.

Related content

Home Office Values

[Contents](#)

Related external links

[Civil Service Code](#)

[Windrush Lessons Learned Review](#)

The Ethical Decision-Making Model

Why do we have the model?

The [Windrush Lessons Learned Review](#) (published March 2020) was critical of the immigration decision-making process, including the quality of some decisions made and the lack of engagement and empathy with customers. The review found that decisions were sometimes based on completing a checklist, rather than assessing or evaluating a case in its full context.

The Windrush Lessons Learned Review recommended that:

The Home Office should develop a set of ethical standards and an ethical decision-making model, built on the Civil Service Code and principles of fairness, rigour and humanity, that BICS staff at all levels understand, and are accountable for upholding. The focus should be on getting the decision right first time. The ethical framework should be a public document and available on the department's website. A system for monitoring compliance with the ethical standard should be built into the Performance Development Review process. (Recommendation 17)

The Ethical Decision-Making Model is a tool for staff to use when making decisions. The purpose is to enable staff to articulate and raise concerns and to seek resolution ensuring that the right decision is made first time. This model addresses the issues that were identified by the Windrush Lessons Learned Review, where staff were aware that unintended impacts of Home Office decisions were occurring, but the culture and processes did not facilitate those concerns being raised or addressed. It is important to note that if you have ethical concerns about a decision, it is your responsibility to consider them and escalate them for advice on how to proceed if necessary.

The model introduces a step in the decision-making process, that prompts decision-makers to consider this ethical decision-making model and the impact of the proposed decision. This enables a decision-maker to consider any issues that cause “**decision discomfort**” - where a decision-maker feels that the proposed outcome is not right or may have unintended consequences for the customer. If you find yourself in this position, you may choose to consult this guidance on the model and if you do, you should:

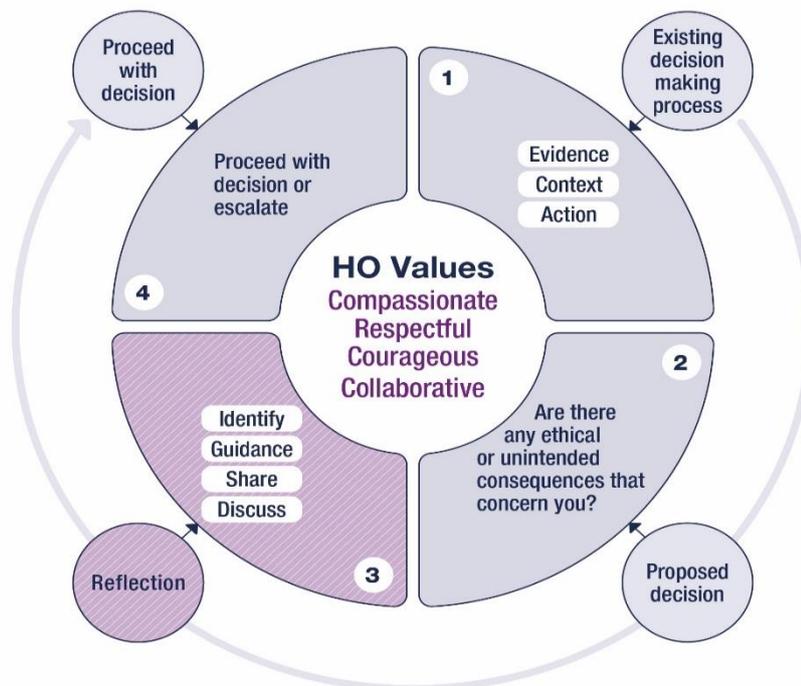
- consider what discretion applies in the case, firstly inside and then if applicable, outside the Immigration Rules
- discuss the case with a colleague, technical specialist or line manager
- if you are unable to find a solution you can escalate the case to another team for further consideration

Using the Ethical Decision-Making Model

The Ethical Decision-Making Model is intended to help a decision-maker to articulate and resolve ethical issues that you identify whilst considering what decision to make. If you identify ethical issues, which give you concern about the impact of the decision on the person such as unfair or unintended consequences, you may resolve them yourself, or in discussion with colleagues, including your technical support chain, by identifying solutions within the existing rules and guidance, including considering what discretion is available to you. If the issue remains unresolved within your business area, you can escalate the issue to an independent team who will provide advice on how to resolve the issue. Contact details for the escalation route available for your business area are set out later in this document.

The model does not direct you as to what you should do or provide a “right answer”. It encourages critical thinking. The model does not replace existing immigration legislation, rules or guidance, nor does it constitute a separate route for you to exercise discretion or grant leave; rather, it prompts you to think critically about exercising the discretion you already have and to escalate an issue where you feel you cannot satisfactorily resolve the issue within the current legal and policy framework.

Ethical Decision Making Model



The relevant, **existing decision-making process** should be followed to the point where you have a **proposed decision**.

Once you have a **proposed decision**, you should **reflect** and **consider the potential impact** of the decision.

Are there any **ethical** or **unintended consequences in the proposed decision that concern you**, for example where the decision is impacting the customer in a way that was not intended?

If you do not have any concerns with the impact of the proposed decision, you can **proceed with the decision**.

If you have concerns, follow the steps below:

1. What is it about the proposed decision that makes you feel uncomfortable?
2. Are you able to make a different decision by applying current rules and guidance that resolves the issue?
3. If you cannot satisfactorily resolve the issue, or do not feel you have the authority to take a different decision, you should discuss the case with someone. This can be with your technical specialist, line manager, team leader or a colleague.
4. If you feel the issue is not satisfactorily resolved, you can escalate the case through the **escalation route** available for your business area:

- **Customer Services Group – Chief Caseworker Unit**
- **Immigration Enforcement – Safety Valve Mechanism**
- **HM Passport Office (HMPO) – Quality Examination Support Team**
- **Border Force – National Immigration Casework Oversight Team**

This model sits alongside the Home Office Values and the [Civil Service Code](#), which guide all of our actions and define our ethics.

Related content

[Contents](#)

Related external links

[Civil Service Code](#)

[Windrush Lessons Learned Review](#)