



An Inspection of UK Visas and Immigration Front End Services

(August 2020 – June 2021)

David Neal

Independent Chief Inspector of Borders and Immigration

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To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

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Foreword

The Home Office has been transforming its visa application services over recent years through the application of new front-end services, “focusing on more digital services, more customer choice and delivering greater value for money”. This collection of services is known as Front End Services (FES). UK Visas and Immigration (UKVI) works closely with commercial partners (CPs) to provide FES for the majority of visa and citizenship customers, and it offers face-to-face support to customers who have specific, or potentially complex, circumstances through the Home Office-staffed Service and Support Centres (SSCs) here in the UK.

This inspection examined the efficiency, effectiveness and consistency of FES delivered by UKVI through its streamlined and digitised UK Visa and Citizenship Application Service (UKVCAS) in-country, Home Office SSCs and Visa Application Centres (VACs) overseas. The scope of this inspection and the initial inspection activity was overseen by my predecessor, David Bolt.

The key findings in this report have led me to make several recommendations, which include: simplify the existing guidance to ensure that it is easy to follow and consistent in order to provide a positive customer experience; publish performance data on waiting times and the availability of free appointments; enhance the technical competency of systems for accessing and uploading supporting documents in order to support customers more effectively; review the communication on ‘Added Value Services’ (AVS) making it clear that these are optional, and free services remain available and will not disadvantage customers; expedite the safeguarding training package for all TLScontact (TLS; part of the Teleperformance group) and VFS Global (VFS) staff, and ensure that any outstanding reviews of the Equality Impact Assessments (EIAs) relating to the operation of FES are completed by December 2021 in accordance with current best practice advice from the Home Office.

Furthermore, in relation to vulnerability, the ICIBI, in its report on the Home Office’s Borders, Immigration and Citizenship Systems (BICS) policies and practices relating to charging and fees,¹ recommended that the Home Office should complete a full post-implementation review of the FES programme to report no later than the end of 2019, to include consideration of the impact on vulnerable applicants. Inspectors were told in March 2021 that the review had not been completed due to the impact of the COVID-19 pandemic. While I recognise that the pandemic presented significant challenges to the Home Office, I also note that it has been 3 years since the recommendations were published, and it is a missed opportunity which could have addressed gaps in service provision and alleviated some of the concerns which continue to challenge vulnerable customers.

¹ <https://www.gov.uk/government/publications/an-inspection-of-the-policies-and-practices-of-the-home-offices-borders-immigration-and-citizenship-systems-relating-to-charging-and-fees>

As with a number of previous inspections, the performance of CPs and other contractual information, which is not already public, was deemed to be commercially sensitive and was not shared with inspectors. While the Home Office did provide some information on the performance issues, Key Performance Indicators (KPIs) and reasons for penalties, details of the total financial amount of service credits imposed on CPs were withheld. It also provided links to versions of the framework agreement for the provision of services on the GOV.UK website, in which the details had been redacted due to commercial sensitivity.

My predecessor raised his concerns with the Home Office and with ministers about the department's refusal to share with us the details of commercial contracts, and had also agreed with the previous Second Permanent Secretary that where the department refused to provide information he had requested, he would publish the Home Office letter of explanation in the respective inspection report. This correspondence can be found in Annexes A and B. I remain concerned about this and will continue to press the Home Office for all relevant information as I initiate my own inspections.

The COVID-19 restrictions and the impact they have had on operational areas have also affected inspection timelines, with delays in receiving evidence from the relevant business areas. Furthermore, inspectors were limited in which sites they could visit to observe the operation of FES and the staff working in those areas. The majority of interviews and focus groups with FES staff were conducted via video conferencing. Despite these challenges, inspectors identified common themes and issues across the areas inspected, which are highlighted in this report.

This report was sent to the Home Secretary on 9 September 2021.

David Neal
Independent Chief Inspector of Borders and Immigration

1. Scope and purpose

1.1 In the ICIBI Inspection Plan 2020-21, the Chief Inspector indicated an intention to carry out an inspection of UK Visa and Immigration (UKVI) Front End Services (FES), to examine the efficiency, effectiveness and consistency of FES delivered by UKVI and through its commercial partners (CPs), particularly its streamlined and digitised UK Visa and Citizenship Application Service (UKVCAS) in-country and Visa Application Centres (VACs) overseas. This inspection focused on:

- guidance, instructions and assistance provided by the Home Office and CPs to assist individuals making applications
- the availability of free appointments
- the 'customer experience' when engaging with application and booking processes, support services, and when attending appointments at a UK or overseas application centre, including 'Added Value Services' (AVS)
- resourcing and training for staff within the Home Office and CPs
- quality assurance, mechanisms for feedback and the handling of customer complaints
- the consideration of vulnerable customers when designing and delivering FES in the UK and overseas
- continuous improvement, including progress in implementing recommendations from previous ICIBI inspection reports

2. Methodology

2.1 Inspectors:

- reviewed open source information about Front End Services (FES)
- reviewed relevant ICIBI inspection reports, in particular ‘An inspection of the policies and practices of the Home Office’s Borders, Immigration and Citizenship Systems relating to charging and fees (June 2018 – January 2019),’² ‘An inspection of the Home Office’s Network Consolidation Programme and the “onshoring” of visa processing and decision making to the UK (September 2018 – August 2019)’³ and ‘An inspection of family reunion applications (June – December 2019)’⁴
- made familiarisation visits to sites supporting and delivering FES in London and Croydon, including virtual familiarisation sessions
- reviewed the preliminary evidence provided by the Home Office to finalise the scope of the inspection
- on 3 September 2020, published a ‘call for evidence’ (CfE) on the ICIBI website seeking contributions from anyone with knowledge or experience of FES, and sent a diplomatic telegram to UK missions overseas with a similar request
- on 2 February 2021, wrote out to all customer-facing staff in UK Visas and Immigration (UKVI) who run the Service and Support Centres (SSCs) and some of the respective commercial partners (CPs) who are delivering FES
- in March 2021, held video conference calls with CP staff (desk agents, supervisors and managers) based in Beijing, Kathmandu, Nairobi and Istanbul
- in March 2021, interviewed and held focus groups with Home Office staff, from Administrative Officers (AO) to Senior Civil Servants (SCS), delivering FES
- in April 2021, visited Edinburgh and Glasgow to observe and interview staff from UK Visa and Citizenship Application Service (UKVCAS) and the Home Office-run SSCs
- analysed the documentary evidence and data provided by the Home Office in response to ICIBI’s formal evidence requests

2 <https://www.gov.uk/government/publications/an-inspection-of-the-policies-and-practices-of-the-home-offices-borders-immigration-and-citizenship-systems-relating-to-charging-and-fees>

3 <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-network-consolidation-programme-and-the-onshoring-of-visa-processing-and-decision-making-to-the-uk>

4 <https://www.gov.uk/government/publications/an-inspection-of-family-reunion-applications-june-december-2019>

3. Summary of conclusions

Guidance, instructions and assistance provided by the Home Office and commercial partners (CPs) to individuals making applications

- 3.1** The digital customer journey for all Front End Services (FES) begins by going onto the GOV.UK website. Home Office published guidance for customers, sponsors and stakeholders is shown on the website in relation to making a UK visa and citizenship application. Customers are then transferred to Access UK, which is still hosted on GOV.UK, to start the application process. Further guidance is shown advising customers what to do as they progress through the application on Access UK.
- 3.2** While there is a large amount of guidance published officially online, respondents to the call for evidence (CfE) indicated that attempting to navigate and understand the guidance is difficult. There are multiple links and landing pages to peruse, and they felt that they needed to do in-depth 'research' or use paid agents to assist. This all adds to the costs of what is already seen as an expensive service when all the immigration fees and other application charges are taken into account.
- 3.3** The CfE responses also indicated that the wording of the guidance can be in overly official language, hard to follow and not easily understood, leading to many self-help groups getting together on external forums to assist each other in understanding what is required. The guidance can also be vague and inconsistent as to what information the customer is required to submit, and checklists are unclear, incomplete or out of date. All of these factors add to the challenges customers face when making an application.
- 3.4** Respondents also stated that the complexity of the process is further compounded by the guidance only being available in English and Welsh on GOV.UK, and for customers who are 'vulnerable',⁵ and where English is not their first language, they felt further excluded and disadvantaged.

Availability of free appointments

- 3.5** Despite Home Office attempts to ensure that free appointments are available to all, it was clear from the CfE that this has not yet been achieved. This limited availability sometimes led to customers having to opt for appointments at a cost, removing the element of choice and imposing a financial burden on them.
- 3.6** Respondents to the CfE described the existing system to obtain free appointments as being difficult to navigate, busy, limited and available only at a small number of sites. UK Visa and

⁵ In terms of EU Settlement Scheme (EUSS) applications, GOV.UK defines vulnerability as follows: individuals who are elderly, isolated, disabled, are a child in care, have significant language or literacy problems, have mental health issues, do not have a permanent address, are the victim of domestic abuse, or are the victim of human trafficking.

Citizenship Application Service (UKVCAS) provided free appointments at only 6 'core' service points or 7 Service and Support Centres (SSCs). Respondents felt let down by the shift from free appointment availability at a nationwide network of Post Offices to only 6 'core' service points. Additionally, when a Member of Parliament raised concerns about a "significant shortage of free appointments", the response by UK Visas and Immigration (UKVI) and CP Sopra Steria Limited (SSL) was "disappointing with no solution offered (by the CP) other than for customers to keep checking for availability".

- 3.7** UKVCAS call-centre agents also stated that the most common topic they received enquiries about was challenges with securing free appointments due to limited availability. Senior managers at the Home Office acknowledged lack of free appointments was a key issue and informed inspectors that they continue to work closely with CPs to consider how this can be addressed.

The 'customer experience' when engaging with application and booking processes, support services, and when attending appointments at a UK or overseas application centre, including 'Added Value Services' (AVS)

Website functionality

- 3.8** Responses from the CfE indicated that the Access UK and GOV.UK websites were reasonably easy to use; however, some described the CP websites as being "frustrating", "dated and clunky", "full of glitches" and sometimes being "slow and non-responsive". In addition, the websites suddenly "crash" or "time out" individuals which has led to problems with customers uploading documents. UKVI's internal Customer Insight report,⁶ which was provided to inspectors, also echoed such views around websites lacking a user-friendly interface, and technical issues preventing them from uploading their own documents.
- 3.9** The provision of Assisted Digital (AD) services by 'We Are Digital' (WAD), which is a support service for customers who do not have the necessary digital skills, is welcomed by stakeholders and customers who view them as a positive initiative. The fact that it provides face-to-face intervention in addition to telephone support is also seen by customers as a bonus. The service level agreements (SLAs) in the WAD contract have been delivered but more can be done to understand the actual impact on customers, and managers indicated that this remains a work in progress.
- 3.10** Concern was expressed by managers that the publicity of the WAD services was limited and more should be done to extend its reach, especially to vulnerable customers. Currently the main way to access this service is through GOV.UK, which can be difficult to navigate. The current WAD contract does not require the provision of support in any languages other than English or Welsh, despite a suggestion by WAD to offer interpretation services. More consideration needs to be given by the Home Office to provision of services in other languages.

⁶ There is now a large amount of activity by Customer and Commercial Services (CCS) team, in close collaboration with CPs, to analyse customer and stakeholder interaction, and this information is brought together in a Customer Insight report.

Geographical location of service points

- 3.11** Customers have indicated that with the move from national Post Office provision to UKVCAS, with 6 core sites and 38 Enhanced service points across the whole country, customers may need to travel longer distances to access appointments, and for those who wish to access free appointments in some cases further so, with an example cited of someone from Bournemouth having to travel to Croydon. Concerns around geographical locations and accessibility were also evident in UKVI's Customer Insight report, which identified a "recurring theme" where "customers felt that they were forced to travel long distances to attend their appointment", both in the UK and overseas.
- 3.12** The geographical spread of overseas Visa Application Centres (VACs) was a particular challenge for the most vulnerable of applicants and those family dependents of refugees seeking family reunion. The inspection of family reunion applications⁷ reported numerous stakeholder concerns about customers having to make "difficult, dangerous and expensive journeys, in some cases crossing into another country, possibly more than once, just to attend a VAC appointment". This was recently supported by research from the British Red Cross report, 'The Long Road to Reunion: making refugee family reunion safer',⁸ published in 2020. The British Red Cross stated that 29% of respondents found the journey undertaken to reach a VAC to be "quite difficult" or "difficult", and 20% reported it as "very difficult".
- 3.13** The Home Office recognises that accessibility remains a problem for some cohorts and is working with CPs and stakeholders to address this through the National Asylum Stakeholder Forum (NASF) – Refugee and Family Reunion Sub-Group, which meets quarterly and provides a platform to focus on the outcomes of the ICIBI family reunion inspection and discuss actions to implement the recommendations.

AVS⁹

- 3.14** Inspectors recognised that AVS, provided by the CPs, are an important revenue stream for those companies and provide customers with an element of choice within their application process. The Home Office made it clear to inspectors that AVS are optional for applicants. However, respondents to the CfE indicated that, due to the complicated nature of the available guidance and the way AVS are "packaged" on the website, they were uncertain as to whether they should purchase these services to ensure that the Home Office viewed their application favourably. This view was supported by stakeholders, who were particularly concerned about the vulnerability of customers who may pay more in an attempt to influence the process. Customers who are not represented by agents face further uncertainty as to what services they should be purchasing and may end up paying for services that they do not require, adding to their financial burden.
- 3.15** Staff working in UK diplomatic missions overseas have also expressed concern about the reputational impact of this "upselling" of AVS, particularly considering this may be the first interaction an individual has with the UK immigration system.

⁷ <https://www.gov.uk/government/publications/an-inspection-of-family-reunion-applications-june-december-2019>

⁸ <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/improving-the-lives-of-refugees/refugee-family-reunion>

⁹ All the AVS feature prominently on the respective websites of the CPs and are seen as part of the appointment booking process, with TLScontact (TLS) describing AVS as "designed to enhance your visa application experience" and VFS Global (VFS) stating that AVS provide "specially crafted optional services to ease your visa application process" and with p-Premium packages offering a "great discount on services designed to make your visa application an easy, effortless process". Sopra Steria Limited (SSL) describe AVS as follows: "you can also buy extra services to make your appointment as easy as possible".

Customer insight

- 3.16** The Home Office told inspectors that it has invested in developing its customer insight and communication strategy in order to improve the customer journey. However, while there is evidence that a lot of positive work is in place to develop customer insight, inspectors were told by Home Office staff that there may not be enough resources dedicated to this area of work. Staff drew comparisons with other departments who they considered to have more resources committed to this work, and they were keen to see more investment being made.
- 3.17** The need for policy and operational areas to understand the value of customer insight and to work more closely with one another, leading to effective development and implementation of strategies, was also highlighted by UKVI staff. Partnership working between CPs and the Home Office with regard to current customer insight was another key issue, with the Home Office feeling that greater transparency and closer collaboration were necessary in order to create a true sense of partnership to deliver a positive experience for the customer.

Resourcing and training for staff within the Home Office and CPs

- 3.18** The Home Office regularly issues training guidance and materials, local instructions, operating mandates and best practice documents to its staff and CPs about the provision of FES. But due to an absence of monitoring or audit evidence, inspectors found it difficult to establish the extent to which training on Home Office policies had been effectively delivered, and the level of understanding held by CP staff on these policies. There was inconsistency between CPs as to how training and information flow was managed. CP staff overseas demonstrated limited levels of confidence and knowledge of safeguarding processes and equality impact considerations. In some instances, where Home Office staff had delivered the sessions themselves, CP staff felt this was extremely useful. With regard to current safeguarding training for CP staff, the Home Office indicated that it was currently working on a safeguarding training package for overseas VACs, but no delivery date was provided.

Quality assurance, mechanisms for feedback and the handling of customer complaints

- 3.19** While inspectors noted that the Home Office and its FES CPs have assurance systems in place in order to ensure reporting, responding to customers and considering what improvements may be required, more needs to be done to provide a level of consistency of assurance across FES.
- 3.20** Inspectors found there were differences between CPs in their approach towards complaints. While the Key Performance Indicator (KPI) across FES is measured consistently both in-country and out-of-country, there are some differences in categorisation of complaints. More specifically, while SSL categorised its complaints into 15 categories, VFS Global's (VFS) complaints data showed the use of 7 categories in the first tier (main category), 43 in sub-categories, and 156 in third-tier categories. TLScontact's (TLS) complaints data showed the use of between 8 and 14 categories. For example, while SSL and VFS had a category for website (technical) issues, a category for this area was absent in TLS's complaints Management Information (MI). Such discrepancies do not allow for a consistent understanding of the data across FES.

3.21 There was also a lack of standardisation and ambiguity of certain complaints categories used by CPs. For example, VFS's data indicated the use of multiple website-related categories such as "website technical issues", "unable to load documents", and "website", and the use of other categorisations such as "random complaint". Furthermore, TLS's complaints data for September 2020 listed "About my documents" as the second largest category for complaints (forming 24% of the complaints received), however it was unclear what this specifically referred to.

Vulnerability

3.22 In relation to vulnerability, the ICIBI, in its report on the Home Office's Borders, Immigration and Citizenship Systems (BICS) policies and practices relating to charging and fees,¹⁰ recommended that the Home Office should complete a full post-implementation review of the FES programme to report no later than the end of 2019, to include consideration of the impact on vulnerable applicants. Despite the recommendation having been made 3 years ago, inspectors were told in March 2021 that the review had not been completed due to the impact of COVID-19, and no date was given for expected completion. This is a missed opportunity which could have addressed gaps in service provision and alleviated some of the concerns that stakeholders and respondents to the CfE have indicated. This review should now be completed as soon as possible.

3.23 The Home Office SSCs were seen in a very positive light by stakeholders and customers, with a high level of overall satisfaction with the services they provide to support vulnerable customers. Customers highlighted the ease of making SSC appointments, the well-informed and well-trained staff who interact with customers effectively, and the provision of the right advice to address the additional needs presented by this cohort of customers. However, geographical coverage of SSCs is a concern, with only 7 locations currently. Enhancing this coverage will improve accessibility for vulnerable customers. There was also the recognition by senior managers that SSCs were only available in the UK, and perhaps the Home Office and the CPs need to give consideration to whether a similar offer based on the SSC model could be made available overseas where there is a particular demand.

3.24 Inspectors requested data on the number of safeguarding referrals from overseas VACs, but the Home Office was unable to provide this information as it was not recorded centrally. The Home Office indicated that it was currently working on producing a safeguarding training package for all overseas VACs. Whether this will lead to a centralised record of referrals remains to be seen.

¹⁰ <https://www.gov.uk/government/publications/an-inspection-of-the-policies-and-practices-of-the-home-offices-borders-immigration-and-citizenship-systems-relating-to-charging-and-fees>

Public Sector Equality Duty (PSED)

- 3.25** The Home Office provided policy equality statements (PES),¹¹ which were completed for the introduction of the UKVCAS service and SSCs in 2018, and Sitel Group in 2017, the CP that provides a direct line to assist with UKVI-related customer enquiries. These PES varied in their content, with either no review dates or any indication that reviews had been undertaken. The Equality and Human Rights Commission (EHRC) advice is that Equality Impact Assessments (EIAs) are ‘living documents’ and as such regular reviews are important in order to ensure that the Home Office is alive to any changing concerns, and policies can be adapted to meet needs. Therefore, ongoing reviews must be a key part of meeting the PSED.
- 3.26** Furthermore, some of the analysis provided in the PES was not sufficient to address what the foreseeable impacts were of suggested changes on people who shared protected characteristics, especially when balanced against the concerns expressed by stakeholders. The Home Office needs to do more work in this area and look to incorporate the EHRC recommendations published in November 2020, which are designed to improve future practices in relation to the Home Office’s duties to have due regard of the PSED across all of its functions.

11 PES were used prior to 2019, and since then the Home Office has reverted to calling these statements Equality Impact Assessments (EIAs).

4. Recommendations

The Home Office should:

Guidance, instructions and assistance provided by the Home Office and commercial partners (CPs) to individuals making applications

- 4.1** Review the existing Front End Services (FES) guidance on Access UK and GOV.UK and, building on stakeholder feedback, ensure that it is simple to follow and clear and consistent, in order to provide a positive customer experience.

Availability of free appointments

- 4.2** Regularly publish performance data on waiting times and the availability of free appointments across all FES providers (nationally and internationally). Further to this, review the mandated proportion of appointments which are available to customers of Sopra Steria Limited (SSL) at no charge (currently at 56% of core site appointments taking place in core hours), together with the range of locations at which these are offered, in order to ensure that demand is being met.

The ‘customer experience’ when engaging with application and booking processes, support services, and when attending appointments at a UK or overseas application centre, including Added Value Services (AVS)

Website functionality

- 4.3** Review and work with CPs and stakeholders to enhance the technical competency of systems for accessing and uploading supporting documents, with a focus on the point at which an applicant is ‘handed over’ from the Access UK (which is still hosted on GOV.UK) to the CPs’ respective websites, in order to support customers more effectively.

Added Value Services (AVS)

- 4.4** Review the communication by CPs and the Home Office on AVS in order to deliver a clear statement that ‘free services’ will not disadvantage applicants, and what the Enhanced service entails that applicants will receive if they buy the optional AVS.

Resourcing and training for staff within the Home Office and CPs

- 4.5** Undertake a review of the training provided to CP staff by the CPs themselves and the Home Office, including the monitoring that is in place to ensure effectiveness of the learning package. Expedite the safeguarding training package for all TLScontact (TLS) and VFS Global (VFS) staff in order to ensure that staff members have the necessary knowledge to address these safeguarding issues.

Quality assurance, mechanisms for feedback and the handling of customer complaints

- 4.6** Ensure that data on customer feedback and complaints and referrals relating to contractual requirements such as safeguarding, imposters and fraudulent documents are consistently recorded centrally in an accessible and reportable format. This will allow the Home Office to use complaints data to drive improvement, as well as improve monitoring and assurance.

Vulnerability

- 4.7** Complete the full post-implementation review of the FES programme as accepted in its response to the ICIBI published report on the Home Office's Borders, Immigration and Citizenship Systems (BICS) policies and practices relating to charging and fees in April 2019. To report by the end of 2021, to include consideration of the impact on vulnerable applicants both in-country and overseas.

Public Sector Equality Duty (PSED)

- 4.8** Ensure that any outstanding reviews of the Equality Impact Assessments (EIAs) relating to the operation of FES are completed by December 2021 in accordance with current best practice advice from the Home Office's PSED team. Ensure that compliance with PSED is a regular agenda item at CPs' performance meetings going forward.

5. Background

UK Visas and Immigration's (UKVI's) Front End Services (FES)

- 5.1** In November 2018, UKVI announced the launch of its 'new streamlined FES' as a step towards its goal to "deliver a world class customer experience that is competitive, flexible and accessible", moving away from the traditional 'paper and post' to more digitised arrangements.¹² UKVI described the customer experience associated with previous arrangements as "fragmented and burdensome" due to the number of touch points for customers, which involved them having to provide a paper-based application, upload biometric details, and send their valuable documents to UKVI who would store them for an undetermined length of time. Although some digital services were available overseas, there was not a consistent offer.
- 5.2** UKVI has continued transforming its customer journey since then, "focusing on more digital services, more customer choice and delivering greater value for money". UKVI works closely with commercial partners (CPs) to provide FES for the majority of customers, and provides face-to-face support to customers who have specific or potentially complex circumstances through the Home Office-staffed Service and Support Centres (SSCs) here in the UK.
- 5.3** As of 1 August 2020, the following FES are delivered by CPs (under contract to the Home Office) on behalf of UKVI:
- the overseas Visa Application Centre (VAC) network run by TLScontact (TLS; part of the Teleperformance group) and VFS Global (VFS) as part of the Next Generation Outsourced Visas (NGOV) contract
 - the UK Visa and Citizenship Application Service (UKVCAS), run by Sopra Steria Limited (SSL)
 - biometric enrolment through the Post Office Limited (POL) (the contract with POL ended on 31 July 2021) – all customers who would have previously enrolled their biometrics at a Post Office location are now invited to visit either a UKVCAS or SSC location, depending on the customer group
 - Assisted Digital (AD) service run by We Are Digital (WAD) and
 - the UKVI Contact Centre, operated by Teleperformance since 2021 – this was run by Sitel UK in 2020

¹² <https://horizon.homeoffice.gov.uk/news/new-customer-application-centres-launching-soon>

Home Office-run SSCs

- 5.4** For customers who may be vulnerable or require face-to-face assistance with their application, UKVI introduced free appointments in 7 dedicated UKVI SSCs in March 2019 (these replaced Premium Service Centres, which provided a same-day, in-person decision service at a 'premium' fee). This allowed for UKVI staff who had more experience and training in dealing with complex applications to "better understand the customer's circumstances, validate evidence, and take appropriate action to support them". In some cases, the Home Office will pay travel costs to enable customers to attend their appointment.
- 5.5** These centres are located in Belfast, Cardiff, Croydon, Glasgow, Liverpool, Sheffield and Solihull.¹³ Customers are directed to use an SSC as part of their application if they are applying for a fee waiver or fee exemption,¹⁴ or based on statelessness and attending principally to give biometrics.
- 5.6** Customers may also be directed to use an SSC if they are applying to remain in the UK based on family life or private life in the UK, on the basis of long residence, based on human rights or for a reason not covered by the Immigration Rules, or to extend their stay or settle in the UK or if they have been refused asylum and granted discretionary leave.
- 5.7** Prior to the COVID-19 pandemic, SSCs had launched a pop-up site at an HM Passport Office site in Durham to reach customers in the north-east; however, at the time of this inspection, this was suspended due to social-distancing constraints.

Overseas VAC network

- 5.8** The NGOV contract was awarded to VFS and Teleperformance (parent company of TLS who deliver the services) in 2013, with VAC services going live from 1 April 2014. These CPs provide a network of overseas VACs, where customers attend to provide identification documents, enrol biometrics, submit evidence and attend interviews (where required), and systems through which customers can upload documents. In addition, these CPs may offer Added Value Services (AVS), such as 'document scanning', to customers at a price agreed with UKVI and in keeping with what the market dictates. These are optional and aim to enhance the customer experience, with CP staff taking on the responsibility to scan the relevant documents on behalf of the customer.
- 5.9** The NGOV contract was for an initial term of 5 years, with the option to extend for 2 further periods of 2 years. Agreement was reached in 2017 to extend the contract for a further 2 years to 2021. In 2020, it was again extended until 2023. The Home Office told inspectors: "The contract was initially for five years with the option to extend for 2 further periods of 2 years. It was extended in 2017 until 2021 with savings of £90 million secured to be delivered between 2017-2021 and then for the final 2 years until 2023. The final extension had delivered £27.6 million of commercial partner investment in biometric enrolment kit and enhanced customer insight solutions."

¹³ <https://horizon.homeoffice.gov.uk/news/opening-doors-0>

¹⁴ Fee waivers can be granted to those making a specified human rights application, where to require payment of the fee would be incompatible with a person's rights under the European Convention on Human Rights (ECHR). Victims of trafficking seeking to extend their leave in certain circumstances can also apply. This does not apply to indefinite leave to remain applications. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/977916/fee-waiver-v5.0.pdf, p7.

VFS

5.10 VFS describes itself as “the world’s largest visa outsourcing and technology services specialist for governments and diplomatic missions worldwide” and provides a wide range of services aimed at “enhancing customer experience in public services with an automated and seamless process”.¹⁵ VFS operates in the following UKVI regions: Americas (North and South, including Canada), parts of the Middle East and Pakistan, South and Southeast Asia and Asia Pacific (including Australia and New Zealand) – with 140 VACs in total at the time of this inspection. VFS also offers video conference interview facilities in the UK that support visa and citizenship decision-making.

TLS

5.11 TLS states its aim is to “help governments to manage these critical procedures, offering end-to-end support to applicants”, allowing government clients to focus on their core decision-making responsibility.¹⁶ TLS currently operates in Europe and parts of the Middle East, Africa and Central Asia, with 114 VACs in total. TLS also collects immigration health surcharges (IHS)¹⁷ globally and in the UK through the provision of an IT portal to UKVI.

SSL

5.12 The Home Office told inspectors that under the SSL-run UKVCAS, customers in the UK applying to extend their stay or for citizenship are able to complete online their application, submit supporting evidence and personal information, and choose any AVS “in a more coherent way” through a single service provider. Appointments for biometric enrolment are then made available at a range of service points nationwide (currently 44) through SSL in-house locations, or in local libraries or through “a significantly expanded set of mobile or on-demand services”. Prior to November 2018, customers were required to enrol their biometrics at Home Office-designated Post Offices or an in-house Premium Service Centre. A key benefit of the new service is that documents are now retained by the customer, providing the individual with reassurance by removing the risk of lost or misplaced documents.

5.13 Customers of SSL also have the option of paying UKVI an additional fee for a quicker service. Prior to the introduction of the UKVCAS, this was delivered through the Premium Service Centres. The availability of a faster service for customers was limited by desk and staff capacity – and tightly limited on some routes. Historically, customer demand for quicker decisions always surpassed the capacity of the Premium Service Centres. The introduction of the UKVCAS has removed capacity restrictions on the amount of people who can opt to benefit from a faster service offering, therefore considerably improving the customer choice that UKVI offers.

Post Office Limited (POL)

5.14 At the time of this inspection, the POL continues to provide biometric enrolment services for a small cohort of customers in the UK who have not yet transitioned to either UKVCAS or SSC arrangements. The POL Front Office Services (FOS) concession started in February 2012 and was initially signed for 4 years, with an option to extend for 2 further periods of one year. The concession has been extended several times since, most recently from 1 August 2020

¹⁵ <https://www.vfsglobal.com/en/individuals/about.html>

¹⁶ <https://www.tlscontact.com/application-processing/>

¹⁷ The immigration health surcharge (IHS) is a fee levied on the majority of UK visa applications. The IHS is in addition to other Home Office immigration fees and is shared between the health administrations in England, Scotland, Wales and Northern Ireland.

for a further year. The Home Office aimed to replace this concession with UKVCAS or SSCs by 31 July 2021. Following the end of the contract with POL for the facilitation of biometric enrolment on behalf of UKVI, all customers who would have previously enrolled their biometrics at a Post Office location are now invited to visit either a UKVCAS or SSC location, depending on the customer group.

We Are Digital (WAD)

5.15 WAD is contracted by UKVI to provide Assisted Digital (AD) services for visa, citizenship and EU Settlement Scheme (EUSS) customers in the UK who are using FES. WAD “is a social-impact-driven company delivering positive and practical solutions to break down the barriers of exclusion”.¹⁸ They provide free-of-charge assistance to customers making applications in the UK who do not have “the necessary digital skills, access or confidence to make an online application”. Support is available either by phone, in person at a network of centres (such as libraries and community centres) or at home with a tutor, and the service provides help in completing immigration applications across all visa and immigration routes. Customers can access the WAD services through GOV.UK and are either scheduled an appointment for a telephone support session or for a face-to-face session. This is a service which is provided to ensure that digitally excluded people can make applications in the UK, once application routes move fully online. A new contract was recently awarded to WAD to continue to provide the service up to 2023.

Sitel

5.16 Since 1 June 2017, the UKVI Contact Centre, which provides a direct line to assist with UKVI-related customer enquiries (originating from both in-country and overseas customers), has been run by a CP, Sitel.¹⁹ For customers calling the Contact Centre from within the UK, calls are free, whereas both calls and emails from overseas are charged. The introduction of email charges was brought in by the new contract between the Home Office and Sitel in 2017. GOV.UK²⁰ specified that this change would “help the government reduce costs and ensure those who benefit directly from the UK immigration system make an appropriate contribution”. Those contacting UKVI from overseas by email from 2017 would be charged £5.48 (including the first email enquiry and any follow-up emails to and from the Contact Centre relating to the same enquiry) and charged £1.37 per minute for calls to the International Contact Centre.²¹

5.17 The Home Office told inspectors that the current contract with Sitel commenced in April 2017 with an initial term to April 2019. An extension was then agreed for a further 12 months until May 2020 with a final extension provision for a further 6 months. This was further extended to February 2021 at which point UKVI transferred to a new provider, Teleperformance, as an interim solution while they established what the Home Office’s long-term customer contact solution will be. The transfer took place in 2 stages, with the in-country Contact Centre transferring on 31 March 2021 and the International Contact Centre transferring on 28 April, when the contract with Sitel came to an end.

¹⁸ <https://www.we-are-digital.co.uk/>

¹⁹ <https://homeofficemedia.blog.gov.uk/2019/11/05/factsheet-uk-visa-services/>

²⁰ <https://www.gov.uk/government/news/customer-enquiry-service-changes>

²¹ The Home Office have since indicated that call and email charges were reduced by 50% on 5 October 2020. The new charges are £0.69 per minute for calls and £2.74 per email enquiry.

UKVI teams responsible for managing FES delivery

5.18 Teams in UKVI involved in supporting FES include:

- Home Office Commercial who ensure CPs meet contractual obligations and performance standards
- the Customer and Commercial Services (CCS) team within Visas and Citizenship, UKVI, consisting of:
 - Supplier Relationships and Services (SRS) teams who work closely with CPs to ensure they meet contractual obligations and performance standards
 - the External Relations team who handle external engagement and provide support with customer-facing communications
 - the Customer Experience Hub which looks to utilise customer insight to make improvements to services
- Elsewhere in UKVI sit:
 - the Future Supplier Services team who are developing UKVI's strategic approach to future commercial arrangements from 2023 onwards
 - the Central Operations team within UKVI Strategy Transformation and Performance who manage the Sitel contract and handle complaints
 - the Family and Human Rights team within UKVI Immigration and Protection who run the Home Office-staffed SSCs

Call for evidence (CfE)

5.19 On 3 September 2020, the Independent Chief Inspector launched a public 'call for evidence' (CfE) via the ICIBI website, inviting submissions from those with knowledge and experience of UKVI's FES.

5.20 The CfE received 181 responses:

- 130 submissions from members of the public (including service-users, individual legal representatives and education advisors)
- 4 submissions from Members of Parliament
- 10 submissions from stakeholder organisations²² (6 legal, one Non-Governmental Organisation (NGO), one All-Party Parliamentary Group (APPG) and 2 from the education sector), and
- 37 submissions from the Foreign, Commonwealth & Development Office (FCDO) and partners across government in response to a Diplomatic Telegram

²² ACS Visa, APPG Africa, Magnee & Co, The Russell Group, Queen Mary University of London, Kent Law Clinic, Law Society, ILPA, Refugee Council, Kingsley Napley.

5.21 A range of concerns were raised in the responses, and these generally aligned to the inspection scope:

- guidance, instructions and assistance
- the availability of free appointments
- customer experience
- resourcing and training for staff
- quality assurance
- vulnerable customers

5.22 In February 2021 inspectors wrote out to all customer-facing staff in UKVI who operate the SSCs and some of the CPs who provide FES on behalf of UKVI, VFS, TLS and SSL, to canvass their views as to how the services were being delivered to customers.

5.23 The key issues raised are as outlined below:

- IT issues and internet connectivity with UKVI's systems
- language barriers with customers
- the large number of documents that need to be scanned and submitted
- lack of clarity in guidance for customers on specifically which documents to bring to appointments
- communication with UKVI's Decision Making Centres (DMCs) regarding the progress of applications

5.24 Some of the concerns from stakeholder organisations are outlined below:

Refugee organisations

5.25 Evidence from the 'Refugee Council' related particularly to the inability of the clients they support to interact with FES. They stated that the process "is not user friendly and our clients are faced with multiple barriers". They also contrast UKVCAS with the UKVI SSCs which they feel provide a more positive experience: "easier to deal with because it is possible to telephone them to book a time for the appointment and those appointments are free, which means that where our clients live close enough, it is a more affordable route". But they also pointed out that SSCs are limited and located in only 7 locations across the country, and they feel that this provision needs to be expanded.

5.26 The Refugee Council submission then goes on to outline their experience, together with case studies, in using FES and the challenges faced:

- accessibility of the service and the support they have to provide to clients so that they can navigate the application process and arrive at a positive resolution of their case
- the experience of clients when attending appointments
- the clarity of guidance and instructions provided by UKVI and by CPs to assist individuals making an application, and the availability and usefulness of advice and support, including from customer contact centres

5.27 They make a number of recommendations, including provision of free appointments at centres across the country so distances people have to travel are kept to a minimum, the application process is modified with more online guidance and forms that can be filled in online or downloaded, and prompt acknowledgement of applications for further leave with an immediate reference number. They also make the case for that more visual products, for example “videos with guidance could be translated into the main languages refugees use”, and this will have the added benefit of empowering them to deal with more elements of the process on their own without depending on assistance.

Legal organisations

5.28 A number of legal organisations provided submissions in which they argued, supported by examples and case studies, for more to be done to address the following:

- lack of clarity around the functions of UKVI and its subcontractors; the role that each party plays in the application process is unclear, and that this makes it difficult to advise and advocate on behalf of clients during the application process
- website functionality needs to improve to ensure that legal representatives are able to use this effectively; several issues were raised with UKVCAS on the Identity Verification (IDV) app²³ but no response has been received by the legal organisations

5.29 They highlight other challenges relating to online forms, payment systems, appointments, overseas VACs, submitting documentary evidence and the responsiveness from the Home Office and CPs to complaints and proposed improvements.

5.30 They speak positively about how “centres are comfortable and operating within the government’s public health guidelines. Staff have been helpful during the pandemic, for example, moving appointments to allow people to enrol their biometrics at a safer time. The introduction of the IDV app has been positive in certain respects, as applicants are not required to attend centres in person.”

5.31 But there remains a sense of frustration that many of these challenges have been raised before but very “little action or no action has been taken”.

Commercial sensitivity

5.32 The Home Office did not share some of the documentary evidence ICIBI requested for this inspection concerning its FES commercial contracts, on the grounds that it was legally bound by the contracts it had signed not to do so. It did not accept the Independent Chief Inspector’s argument that this was wrong “both in law and in principle” since it meant that Independent Chief Inspector was unable to perform his statutory duties as set out in primary legislation (UK Borders Act 2007) and that the “refusal to provide performance data [was] particularly egregious”. As agreed with the previous Second Permanent Secretary, in instances where the department refuses to provide information which has been requested by the Chief Inspector, the letter of explanation from the Home Office will be published in the inspection report.

²³ In response to COVID-19, UKVI announced a new biometric reuse policy, where eligible applicants that have previously submitted biometrics to UKVI will not have to repeat the whole identity verification process. The new IDV app, which was made available from 17 August 2020, claims to be quick and easy to use and works on most Android and iPhone smartphones. The app is free to use for eligible applicants to submit their information to UKVI by taking a photograph of themselves and their travel document and uploading the documents via their smartphone. Only applicants that receive an email invitation can use the app, so those who have not previously submitted biometric information to UKVI will not be able to use it.

6. Inspection findings: Guidance

Home Office guidance for Front End Services (FES)

6.1 The customer application journey within the FES begins with the customer logging on to GOV.UK, which provides the Home Office published guidance for customers, sponsors and stakeholders.

“In 2014 the Home Office introduced a new digital application service for customers in China to apply for visitor visas online. Following its successful launch Access UK has now been made available for customers applying to visit the UK in over 180 countries and 10 languages [...] Access UK means visa customers can:

- make quicker visa applications using an intuitive online form
- use easy-to-follow checklists and steps which list the documents required to make an application
- apply flexibly using any mobile device”²⁴

6.2 On accessing the application landing page on GOV.UK, the guidance directs the customer to 4 key links to begin the process of applying for a visa as below:

- “Choose a visa
- Prepare your application
- Prove your identity
- Getting a decision on your application”²⁵

Visa choice

6.3 Under ‘Choose a visa’, the guidance informs the customer that there are various purposes for which they may require a visa, which include to study, work, visit or join family in the UK. It lists 10 different visa categories, each of which has embedded links which the customer will be asked to consider.

6.4 Once they have selected a category and clicked on a link, the customers are taken to another landing page which has another series of links for them to consider and act on. For example, choosing ‘If you want to visit the UK’ visa category and clicking on the ‘Standard Visitor Visa’²⁶ takes customers to a landing page which has another list of 7 content links. Clicking on these links takes the customer to information which has further links embedded. The same format is used across the other visa categories.

²⁴ <https://www.gov.uk/government/news/new-digital-visa-application-service-now-available-worldwide>

²⁵ <https://www.gov.uk/apply-to-come-to-the-uk>

²⁶ [Standard Visitor visa – GOV.UK \(www.gov.uk\)](https://www.gov.uk/standard-visitor-visa)

Application

- 6.5** Having chosen a visa, the guidance moves customers on to ‘Prepare your application’²⁷ which has another 6 links, from fees to payment of immigration health surcharges (IHS). On completion the customer is directed to pay their visa application fee and, if applicable, the IHS.

Prove your identity

- 6.6** At this point the customer needs to validate their identity. There are 2 prescribed routes depending on the customer’s location, and they will be redirected to follow the guidance on the website of the commercial partner (CP) that is responsible for that location.²⁸

Route 1: The overseas Visa Application Centre (VAC) network:

- 6.7** The transition of the applicant from UK Visas and Immigration (UKVI’s) Access UK system to the relevant CP’s system is automatic, and key application details are transferred via an interface. At the time of the application ‘hand off’ customers are required to create an account password and select the VAC which they wish to attend to provide their biometric information.
- 6.8** The preamble of the online application form states: “To complete your application, you must make arrangements to provide your biometrics (fingerprints and facial photograph) with our commercial partner, which may involve attending one of their centres. You will be able to see the options available to you after you have completed your application and continue to our commercial partner’s website.”²⁹ The guidance also highlights to the customer that they have the option to purchase any Added Value Services (AVS) advertised on the CPs’ websites.
- 6.9** According to VFS Global’s (VFS) website,³⁰ customers are given a reference number once they have paid their visa fees, which allows them to ‘tailor’ their upcoming visit to the VAC with the available range of optional Premium services. TLScontact’s (TLS) website³¹ advises customers to create their ‘personal user account’ and fill in the requested personal data once the account has been activated. After this, they are required to choose a date and time to submit their application at the VAC.
- 6.10** Having moved on to the CP’s website, the guidance then provides the customer with the option to choose whether to self-upload their documents ahead of their appointment at the VAC. If they select this option, they can upload their documents until the day of their VAC appointment. This is done via the relevant CP’s website and is free of charge.
- 6.11** If the customer does not wish to self-upload, the guidance directs them to an option to have their documents scanned at the VAC by a CP representative for a charge, which is part of a range of optional AVS a customer can purchase. A standard appointment at a VAC should be available to book within 5 working days or the next available opening cycle, as per the contractual requirements between UK Visas and Immigration (UKVI) and the CPs. At the time of this inspection, VACs were meeting this service level agreement (SLA).

²⁷ <https://www.gov.uk/apply-to-come-to-the-uk/prepare-your-application>

²⁸ At the factual accuracy check, the Home Office indicated “Customers may also be directed to book an appointment at a UKVI run Shared Service Centre.”

²⁹ <https://visas-immigration.service.gov.uk/country-selection>

³⁰ <https://www.vfsglobal.co.uk/in/en/how-to-apply>

³¹ <https://de.tlscontact.com/za/zay/page.php?pid=procedure>

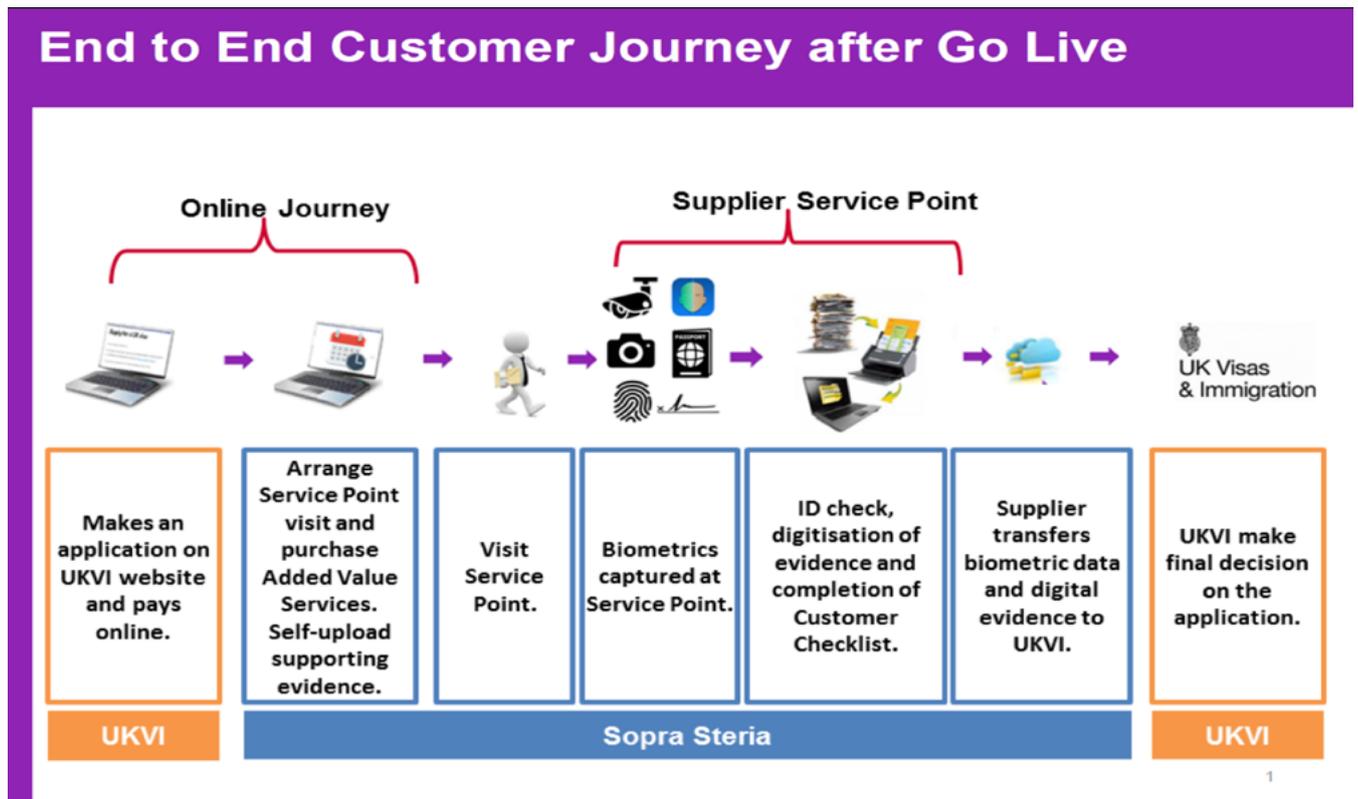
- 6.12 On arrival at the VAC, the customer will submit their documents unless they have already uploaded them. The VAC staff will also conduct an identity check. There is a charge for this service if it is to be done at the VAC. UKVI has indicated that the SLA for the duration of the customer journey within the VAC is 45 minutes, which starts from the customer’s appointment time.
- 6.13 The customer’s passport will be checked, scanned, and retained in a secure location unless the customer has opted to retain their passport under the ‘keep my passport whilst applying service’.

Route 2: Services within the UK (in-country)

- 6.14 At the time of the inspection, these were delivered through 3 strands:
 - the UK Visa and Citizenship Application Service (UKVCAS), run by Sopra Steria Limited (SSL)
 - Home Office-staffed Service and Support Centres (SSCs) which provide face-to-face support to customers who have specific needs or potentially complex circumstances
 - biometric enrolment through the Post Office Limited (POL)

UKVCAS

Figure 1 below shows the end-to-end customer journey through the UKVCAS system.



- 6.15 Since November 2018, the majority of people seeking to extend their stay in the UK to work, study, be with family, settle here permanently or become British citizens have used UKVCAS. UKVCAS also processes some third country nationals who need to enrol their biometrics when applying to the EU Settlement Scheme (EUSS) or through legacy European application routes.

6.16 The Home Office told inspectors that the introduction of UKVCAS has simplified the application process and allows customers to book one appointment at which they can provide their biometrics, have their identity checked and submit their supporting documents. The Home Office felt that an added benefit of this service is that documents are now retained by the customer, providing the individual with reassurance, and also removing the risk incurred in the department handling hundreds of thousands of valuable documents.

6.17 Once a customer has successfully submitted their application on GOV.UK, the guidance³² invites them to book an appointment which will then redirect them to the UKVCAS booking system. The customer will next be instructed to log in and generate an access code which they will receive by email. The UKVCAS booking system allows for choice based on location and date. When a customer is making an appointment, they will see options based on their nearest service point, which are broken down into 3 categories:

“There are 3 different types of UKVCAS service points, which offer different locations, facilities and comfort. All offer standard, out of hours, next day and same day appointments:

- core service points are larger locations that offer both free of charge appointments, and out of hours appointments bookable for a fee
- Enhanced service points offer an inclusive package of extra services, such as document checking in advance of your appointment and document digitisation at the service point
- a Premium Lounge that offers a personalised customer experience”³³

6.18 UKVCAS allows customers to book an appointment based on their preferred date, location and ability to pay.

6.19 The website continues, “To complete your application, you must attend a UKVCAS service point to have:

- your identity confirmed
- any required biometric information enrolled
- any required supporting documentation digitised and checked
- confirm you are happy to send your application to UKVI

“You can book an appointment in 2 ways:

- online by either clicking the link to book an appointment from your UKVI account or by clicking the link in the UKVCAS account setup email you have been sent
- by phone by calling the UKVCAS Premium Support Line on 0844 8920232 (Calls cost £0.04 per minute) plus your provider’s access charge.

“All appointments must be pre-booked before you attend a Service Point. If you cannot find an appointment at your desired location, date, or time, you can search again using a different postcode or use the ‘next’ link to see appointment availability for the following week.”³⁴

6.20 Free appointments are available at 6 core service points at Belfast, Birmingham, Cardiff, Croydon, Glasgow and Manchester, between 09:00 and 18:59, Monday to Friday. SSL have

³² <https://www.ukvcas.co.uk/home-internal>

³³ <https://www.ukvcas.co.uk/home-internal> – service point types.

³⁴ <https://www.ukvcas.co.uk/home-internal>

indicated that free appointments book up very quickly, so customers may need to book a few weeks in advance. If a free appointment is not available at the 6 core centres, the customer can choose to wait for a free appointment, or they have the option of selecting an appointment out of hours or at an Enhanced service point which would incur a charge.

SSCs

6.21 The guidance for SSCs on GOV.UK sets out the steps to follow and outlines the actions to be taken:

“For some UK visa and settlement applications, you’ll need to make an appointment at a Service and Support Centre (SSC). You’ll be told if you need to go to an SSC when you apply for your visa. The SSCs offer free appointments for standard applications (fee paid or exempt), or for those customers just requiring a biometric appointment. You may be eligible for the super priority service to get a faster decision on your application. It costs £800 per family member in addition to the application fee.”³⁵

6.22 The guidance goes on to explain how customers can make an appointment, what happens at an appointment, and what documents to bring. It also provides steers for joint applications and children under 16. With regard to receiving a decision, it states: “You will not get a decision on your application at your appointment. How long a decision takes depends on what you have applied for.”

6.23 The guidance then directs you to the SSC locations, which are in Belfast, Cardiff, Croydon, Glasgow, Liverpool, Sheffield and Solihull. In some cases, the Home Office will pay travel costs to enable customers to attend their appointment. Such customers are identified through the Fee Waiver or Change of Conditions process when they book their appointment. Customers may also highlight their specific needs, such as a disability that prevents them from using public transport, to the Service and Support Appointment Line (SSAL), who will consider whether to make bespoke travel arrangements.³⁶

Post Office Limited (POL)

6.24 During the evidence-gathering phase of this inspection, POL was providing biometric enrolment services for a small cohort of customers in the UK who have not yet transitioned to either UKVCAS or SSC arrangements.

6.25 The POL Front Office Services (FOS) concession started in February 2012 and was initially signed for 4 years, with an option to extend for 2 further periods of one year. The concession has been extended several times since, most recently from 1 August 2020 for a further year, until 31 July 2021.

6.26 A UKVI case worker sends a Biometric Notification Letter (BNL) to the applicant who then brings it to a respective POL branch, and staff follow set guidance as outlined in the ‘UK Border Agency [sic] Front Office Service Training Workbook’.

³⁵ <https://www.gov.uk/visas-and-immigration-service-and-support-centres>

³⁶ The criteria are: they have been granted a fee waiver along with the following – • in receipt of asylum support or Local Authority support • Domestic Violence customers • a responsible adult attending an appointment with a child in social care • anyone where paying for travel would render them destitute • where travel is over 3 miles.

We Are Digital (WAD)

- 6.27** WAD provide free-of-charge Assisted Digital (AD) services to customers making applications in the UK if they do not have the necessary digital skills, access or confidence to make an online application. They provide free assistance via telephone or through in-person help, either at a network of centres (such as libraries and community centres) or in the customer's home with a tutor.
- 6.28** Inspectors were provided with a list of 52 locations where in-person AD help is provided. The opening times for these vary between each location as some centres may not be open every day.
- 6.29** Customers who are identified via the WAD call centre as being in scope for AD support are either scheduled an appointment for a telephone support session or for a face-to-face session in one of the centres or in their own home via a home tutor.
- 6.30** The AD SLA sets out that 95% of those in scope for support should be appropriately triaged within one day of their enquiry; 50% of the agreed vulnerable population should be given face-to-face support, or the reason why not established, within 5 days of their enquiry.

Languages

- 6.31** Inspectors requested a list of foreign-language versions of guidance available to applicants regarding the use of FES and their dates of issue. In response, the Home Office told inspectors:

“GOV.UK and Access UK provide guidance to customers on the use of visa application services in English and Welsh only.

- 6.32** In respect of services provided by CPs, inspectors found:

SSL

- 6.33** UKVCAS only offers interpretation as an AVS. UKVI told inspectors that: “UKVCAS can arrange for an interpreter to be available for customers over the telephone if they require language assistance during the appointment. Interpretation services are only available at core service points and the Premium Lounge. You can choose the interpretation service when you book your appointment. The price for this service is £64.99 in total.”

TLS/VFS

- 6.34** “UKVI told inspectors that both TLS Contact and VFS Global have not been contracted to provide interpretation services to applicants overseas in VACs or over the phone, however the majority of overseas VACs employ staff who speak and engage with customers in local languages. They would not however get involved in translations of documents or any interviews that are conducted between customers and UKVI.”
- 6.35** UKVI does not provide foreign-language versions of guidance.
- 6.36** However, TLS have been providing foreign-language versions of guidance and content on their websites since quarter 4 of 2014 in Arabic, French, Turkish and Russian, in line with contractual requirements. From the end of 2018, they have also included Spanish.

- 6.37** VFS provides information about the visa application process and their services on its websites in 16 different languages as per their contract requirements.

Service and Support Centres (SSCs)

- 6.38** SSC customers who require the services of an interpreter are directed to telephone the SSAL to book their appointment once an application has been completed and submitted online. Appointments are booked over 10 working days ahead to allow arrangements to be made for a face-to-face or telephone interpreter.
- 6.39** The SSCs follow an established process to obtain a face-to-face interpreter, but if this is not possible, they will utilise ‘thebigword’³⁷ telephone interpreter service. There are over 180 languages and dialects available via face-to-face interpreters at the SSCs, provided by ‘thebigword’.
- 6.40** There are no set eligibility criteria at the SSC for requesting an interpreter. Moreover, it is a principle of their safeguarding policy that if the customer is accompanied, the person accompanying them cannot answer questions for the applicant. This is to ensure that the customer’s true response is heard, and they are not being misrepresented, coached or exploited by the attending party. It is for this reason that they do not allow family members to translate for customers.

Sitel

- 6.41** The number of languages offered for assistance is currently 8 (English, Arabic, Cantonese, French, Hindi, Mandarin, Russian and Spanish).³⁸ When the customer contacts Sitel via the ‘Contact us’ pages on GOV.UK, they are invited to select a language from these options. Each language is then covered by a separate telephone number, allowing the customer to telephone an agent speaking the chosen language. The contact centre moved to a single number on 1 December 2020, so a customer will now use only the one contact number to call Sitel and will make the language selection through the Interactive Voice Response.
- 6.42** If there are no language agents available, the customer will be given the option to speak in English or wait until the next available agent. Customers can also email Sitel in any of language options at any time and will receive a response in their chosen language.

We Are Digital (WAD)

- 6.43** WAD is only required to provide services in English and Welsh for the AD service. However, there is also a third-party over-the-phone translation service that customers can utilise when required. They have also provided translation of marketing material into Polish for a set of specific events for the Home Office’s EUSS. Further translations may be considered as part of planned marketing campaigns to identify and reach out to more difficult-to-reach groups. The Welsh translation of WAD materials was produced on 27 January 2020, and the Polish translation was produced on 30 January 2020.

³⁷ <https://en-gb.thebigword.com>

³⁸ <https://www.gov.uk/contact-ukvi-inside-outside-uk/y/outside-the-uk>

Web links

- 6.44** The numerous links to other GOV.UK pages that customers and their representatives have to navigate is a cause for concern, with responses from the call for evidence (CfE) indicating: “It’s a confusing, counter intuitive online application process that provides little guidance on what visa category the applicant should choose and fails to ‘nudge’ the applicant along in the process.” Customers felt that they needed to research and move across links to understand what is required and that “nothing about this visa is all in one place, you have to know to look on several GOV.UK pages”.
- 6.45** Challenges in locating the appropriate guidance and forms led to respondents suggesting processes should be simplified: “Given the unwieldiness of the Home Office website it can be difficult to find the form required for the application. The website would be easier to navigate with a drop-down menu and a better search engine. The relevant Rules could also link to the forms so the requirements to be met can be readily seen. All commercial sites should provide an easy to use ‘How to Guide’ for users on how to navigate them.”
- 6.46** In interviews with UKVI staff, inspectors were told that “more can be done to improve guidance”, for example, for customers who need to provide proof of residence, “the guidance lists what is not allowed but doesn’t list what is”.

Understanding the guidance and its requirements

- 6.47** Responses from the CfE have also indicated that the wording of guidance can be overly formal and hard to follow, which has led to many self-help groups getting together on external forums to assist each other, “and there are many Facebook forums dedicated to getting help on this form because it is so difficult”. While customers recognise that immigration law is complex and trying to simplify it can be difficult, the offer to customers from UKVI should attempt to address the issues raised by these self-help groups and forums as part of a continuous improvement effort. Inspectors were told by UKVI staff that they need to “develop more work around social media in order to inform and shape the customer journey”, demonstrating an awareness of the gaps in guidance being filled by unofficial providers, and the need to bring those remedies in-house.
- 6.48** CP staff told inspectors that they found the guidance to be vague, leading to documents being uploaded incorrectly by customers, which impacts on their time: “HO [Home Office] guidance can be vague and therefore takes a lot of time uploading, for example financial information – we have been instructed not to check the documents but to upload what they bring.”
- 6.49** CfE responses highlighted that the guidance with regard to the travel history section requires all absences from the UK regardless of length to be stated for all children, but this is sometimes totally irrelevant to what is being applied for:

“The forms require details of absences for all children of the family. Each trip has to be inputted with exact dates in and out of the country. This information is completely irrelevant to the issues but even if this information was necessary it would be far easier to ask for absences to be listed in a textbox where it would be easier to generate a list and also to provide approximate dates when exact dates cannot be provided. Some countries don’t stamp nationals in or out, EU nationals don’t have their passports stamped on arrival in the UK or in the EU generally. Hence getting this information can be very difficult. Not only is this information completely irrelevant but hugely difficult to obtain and input.”

6.50 Stakeholders told inspectors that the complexity of the guidance is further compounded when dealing with vulnerable groups like refugees who “face complex barriers associated with poor mental health, exclusion, not speaking the English language at a specialist level (which is required when engaging with the Home Office’s processes)”, which lead to their clients being unable to self-advocate and access information online. The guidance and instructions provided are not sufficient when they try to make applications on their own, which means they then have to seek assistance in order to complete applications and secure appointments and:

“this impedes their ability to be independent, to learn and integrate. Unfortunately, this process is counterintuitive and makes them feel like they are not capable of achieving anything [...] from a casework perspective the system is not designed appropriately to cater to the needs of refugees. The system is set up in one size fits all, as soon as you don’t fit in the framework you are stuck and can’t proceed. Furthermore, there are no adjustments for people with special needs, like those who are visually impaired.”

6.51 A senior manager in UKVI indicated “that customers find it difficult to get guidance with GOV.UK being a “one-size fits all approach that doesn’t work”. Guidance should be more attuned to the customer and more user-friendly as it impacts the customer journey.

Checklists

6.52 GOV.UK advises customers to:

“make an appointment at a visa application centre to provide your biometric information (your fingerprints and a photograph). At the appointment, you’ll need to submit documents that show your eligibility. The document checklist in your application will explain what to provide [...]”³⁹

6.53 Responses from the CfE have indicated that the document checklists have proved to be difficult, with customers and their agents citing a variety of examples to inspectors of where the checklist is not clear, incomplete or altogether wrong:

- “Family Leave to Remain (FLR) customers (as a parent or as a partner) are asked to provide information about the partner’s children in the UK (who are not applying with the application), but do not specify whether this concerns only minor children. Applicants have to provide e.g. the adult child’s passport, custody arrangement and proof of residence, which are unnecessary.”
- “The Immigration Rules and Home Office policy do not require marriage and birth certificates to be submitted in dependant extension applications where these documents were relied on in the initial application. However, online application forms do not have options which reflect this, and the auto-generated checklist therefore requires these documents to be submitted.”
- “The list of mandatory/optional documents is sometimes misleading. For example, in certain applications the list of mandatory documents only refers to passports or Biometric Residence Permits. Other documents that are listed under the headings ‘finances’, ‘sponsor’ and ‘residence’ are labelled optional. As a result, a lay applicant may consider that bank statements to evidence their finances are optional, even though this is a requirement for the application.”

³⁹ <https://www.gov.uk/apply-to-come-to-the-uk/prove-your-identity>

- “The employment evidence section recommends uploading your employment letter and payslips, while the financial section also recommends uploading your payslips in that section too, causing duplicated documents.”
- “The document list that they get from UKVI is not clear especially for example, biometric replacement does not mention passport – because the doc checklist does not ask for passport. Checklist to be made clearer: for example, bank statements can go into different categories so if this is made clear (segmented) makes life easier for applicants.”

6.54 This could have been clarified if the checklists were properly tested and subjected to regular review by the Home Office, but inspectors were not provided with evidence to indicate that this was happening.

6.55 With reference to the SSL upload section, which automatically generates a list from Access UK, in a dependant Tier 1 (Entrepreneur) application, “the birth certificate should not be mandatory as this was provided in the initial application, but this features in the mandatory section. Customers have reported officials requesting an applicant to upload their birth certificate when they did not need to do so.”

6.56 CP staff also told inspectors that “they do not understand the purpose of the non-mandatory documents and there should be more guidance re non-mandatory, so that customers can be clear with regards to what is required and you avoid customers coming in with a load of documents to scan – for example set time lines for bank statements”.

Need for third-party support

6.57 Inspectors also noted in their interviews with CPs and from the feedback from customers that, due to complexity of guidance, there is a tendency to use agents or lawyers to ensure a smooth service. A customer said: “Generally the application process isn’t easy or straightforward to use and complete and I feel I have to pay an immigration lawyer to make sure everything is correct and in place, otherwise I feel it might get rejected.”

6.58 Submissions received from legal stakeholders also support the notion of third-party support becoming the norm due to the fact that “solicitors and other immigration professionals who regularly engage with the system may develop an inner knowledge that first-time users would not have access to, such as a certain website working on one browser but not others, or how to resolve being repeatedly ‘locked out’ of an account”.

6.59 They go on to state that due to the complicated nature of visa applications and the high fees involved, it sometimes means that customers are disadvantaged:

“While legal support is undoubtedly helpful for many complicated scenarios, we do not believe that this should be a standard requirement in order for any individual to engage with the visa application process, which should be available to all regardless of their financial situation. There are already very high fees involved in immigration applications and applicants should not be induced into paying for services they do not want or need.”

Language support

- 6.60** There are added challenges for the customer whose first language is not English when English and Welsh are the only languages in which the guidance is available on GOV.UK. TLS and VFS do not offer any interpretation services to overseas customers in VACs or over the phone, and SSL only provides interpreters at a cost to the customer.
- 6.61** Inspectors recognise that efforts have been made to address language issues with the provision of translation telephone services provided by ‘thebigword’ at SSCs, and CPs looking to provide translations on their websites, but more accessibility and support needs to be considered. Improvements in this area should tie in with recommendations from the inspection on the use of language services in the asylum process.⁴⁰ The Home Office responded that it has a:
- “Programme to build in existing improvement work and deliver additional solutions that address the ICIBI’s recommendations. The Programme is supported by detailed plans, covering a multitude of activities to improve structure and governance, technology, system innovation, quality assurance, data capture, performance, policy, customer experience, risk management, commercial, language resourcing and language industry mapping. A central team managing the work has been in place since the Spring 2020.”
- 6.62** A senior manager from one of UKVI’s CPs expressed that “support and language help is needed”, citing instances where customers had experienced difficulties when filling out their application form online, also stating that there was “a lack of free support”. Another manager described such challenges experienced by customers as “a common problem”, and a supervisor of a VAC informed inspectors that most customers required “agents” (unofficial, paid helpers) to assist them with filling in their form. In the absence of free-of-charge assistance, customers were advised to purchase an “application form-filling” AVS or to contact Sitel for assistance, both of which came at a cost. Another VAC manager stated that the “biggest complaint is the language barrier”, and desk agents have indicated that “customers could benefit from instruction in their own language”.

Positive experiences

- 6.63** Some of the responses received from the CfE indicated that getting to the guidance is relatively easy for those who have a basic understanding of using digital devices: “the online way of filling out the application form is great. It’s simple way to answer the questions we are asked”. Accessing application forms was simpler: “online application form required by UKVI is easy to access using basic internet search functions or directly from the GOV.UK website by using the built-in search and navigation tools”.

Guidance for staff

- 6.64** UKVI told inspectors that it regularly issues guidance, local instructions, training materials, operating mandates and best practice documents to Home Office staff and CPs about the provision of FES. For example, the Central Operations team within Visas and Citizenship regularly issues Operational Policy Instructions (OPIs) to UKVI staff about VAC charges and biometric enrolment services. However, no central record is kept of guidance or training material that has been issued to CPs or internally to Home Office staff.

⁴⁰ <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-use-of-language-services-in-the-asylum-process>

- 6.65** The Home Office also told inspectors that they have an incident management Standard Operating Procedure (SOP) allowing CPs to report any concerns and flag issues to “create one standardised process for reporting incidents by UKVI’s CPs. This was a collaborative piece of work between the Supplier Relationships and Services (SRS) team, the Integrity Manager Network and CPs to ensure incidents are reported accordingly and in line with the contractual provisions.”
- 6.66** The SOP is described as follows: “part of UKVI’s drive to ensure consistency amongst the Front End Services contracts, this Standard Operating Procedure (SOP) will be applicable to Sopra Steria, TLS and VFS. The purpose of the SOP is to ensure that all CPs report incidents in accordance with the provisions of the relevant schedules of the contract promptly to ensure the effective management of all incidents.”
- 6.67** When inspectors held their focus groups and interviews with staff at SSL, TLS and VFS in March and April 2021, and enquired about guidance and reporting mechanisms with regard to incident-handling, no reference was made to the SOP.
- 6.68** Inspectors, through their further evidence request, sought to clarify with the Home Office how CPs have shared and put into practice the FES policies, guidance (including ‘user guides’), SOPs and instructions with their staff and customers. Although inspectors were made aware of the availability of a range of FES guidance, local instructions, training materials, operating mandates and best practice documents which are shared with CPs, inspectors were less clear about how CPs have embedded this guidance into their customs and practice, so that their staff are aware of the requirements, and how the Home Office was able to monitor it.

Where guidance is held

- 6.69** Speaking to staff working for FES CPs, inspectors were informed that guidance is collated and held by CPs in different ways. Once guidance has been passed to CPs, the Home Office does not mandate how and where guidance is stored. This leads to inconsistency in the accessibility of guidance across FES. The first example is TLS, which has an intranet portal called ‘OpsWiki’ where inspectors were told that all internal guidance is held, and TLS staff indicated that this was useful.
- 6.70** VFS does not have a portal. VFS staff told inspectors that they would find it helpful: “a central portal which acts as a knowledge bank for all VACs in which UKVI can populate/cascade new information will be useful – especially as old information can be updated [if such a system is in place]”.
- 6.71** Inspectors were told that SSL have a folder with all the guidance that is issued together with an online portal on Microsoft Teams, and staff have access to this information.

7. Inspection findings: Availability of free appointments

UK Visa and Citizenship Application Service (UKVCAS)

- 7.1** Prior to the introduction of UKVCAS in November 2018 and the Service and Support Centres (SSCs) in March 2019, biometric enrolments were carried out at a network of Home Office-designated Post Offices located throughout the UK, or alternatively at Premium Service Centres, where a fee was chargeable. Biometric enrolment services at Post Offices did not require customers to book an appointment, and the biometric enrolment fee of £19.50 was paid to the Post Office directly, rather than being paid to the Home Office as it is now, unless the customer had a fee waiver, in which case the enrolment fee was covered by the Home Office. It should be noted that before November 2018, customers still needed to print and complete application forms and send payments and documents.
- 7.2** The introduction of UKVCAS brought in the new categories of core, Enhanced and Premium service points. There are 6 core service points, which are located in Croydon, Cardiff, Birmingham, Manchester, Glasgow and Belfast. These offer free-of-charge and paid appointments, with the free-of-charge appointments only being available during 'core hours'. Out-of-hours appointment charges start from £112 per person. Appointments at the Enhanced service points and the Premium service points are paid, starting from £71.50 per person at Enhanced sites and from £210 per person at Premium locations. These charges are in addition to any other Added Value Services (AVS) the customer may choose to purchase.
- 7.3** Although the change brought a shift from free appointment availability throughout the day at a wide network of Post Offices located nationwide to 6 core service points within 'core hours', UK Visas and Immigration (UKVI) stated that the new service would bring benefits including "free appointments available to all".
- 7.4** A specific Key Performance Indicator (KPI) for free appointments was introduced into Schedule 7 of the Front End Services (FES) UKVCAS contract with Sopra Steria Limited (SSL) in March 2020 (KPI 8) in addition to the existing KPI on 'Availability' (KPI 1). The latter did not make specific reference to free-of-charge appointments.⁴¹ KPI 8 within the contract articulates the percentage of appointments which are to be available to customers at no charge between core hours, from Monday to Friday, specifying that 56% of core site appointments within core hours must be free appointments.

⁴¹ <https://www.contractsfinder.service.gov.uk/Notice/ec5031ea-021e-471a-86cf-af540e8d8efa>

- 7.5** Despite the introduction of KPI 8 in March 2020, performance data was limited. UKVI told inspectors that due to a COVID-19 related service suspension, no appointments had been conducted at UKVCAS service points between 26 March and 31 May 2020. UKVCAS had resumed services in a “phased approach” from 1 June 2020, which meant that the service offering was “significantly reduced”. As a result, KPI 8 on ‘free appointments’ had not been fully implemented until UKVCAS returned to a ‘business as usual’ operating environment in September 2020. A senior manager within UKVI told inspectors that the 56% target for free appointment availability at core sites was being met, and transparency data allocated a rating of ‘good’ for SSL’s performance against this KPI.

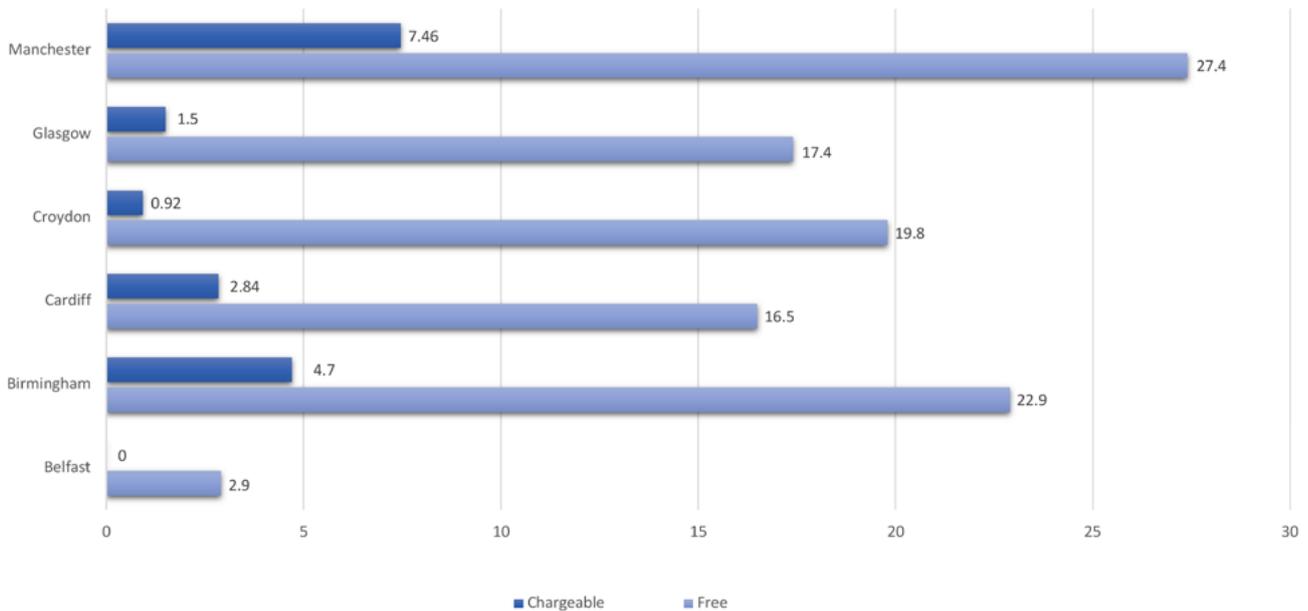
Shortages of available free appointments

- 7.6** Despite attempts to ensure “free appointments available to all”, concerns about scarcity were raised in submissions received in response to the inspection’s call for evidence (CfE). Responses to the CfE described the UKVCAS system as “a nightmare”, “very busy with no appointments available for anyone”, with free appointments being “few and far between”, and only available at “a very small number of UKVCAS core centres”. One stated: “UKVCAS has let us down, by intentionally providing very limited ‘free’ appointment slots, and very few ‘core’ centres.”
- 7.7** Additionally, a Member of Parliament raised concerns about a “significant shortage of free appointments”, which when raised with UKVI and SSL had resulted in a response that was “disappointing with no solution offered” other than for customers to keep checking for availability. UKVCAS call centre agents told inspectors that the most common topic they encountered in enquiries from customers was about securing free appointments due to limited availability, and senior managers at UKVI informed inspectors that the lack of free appointment availability was a key issue that was raised with them by stakeholders. During a visit to the core site in Glasgow on 14 April 2021, inspectors were told that the next available slot for a free appointment at this site was on 12 May.

Waiting times for free and chargeable appointments

- 7.8** KPI 1 of the FES contract between UKVI and SSL on appointment availability states: “The Services shall be Available for Customers to attend a Service Point within seven (7) calendar days of Application.”
- 7.9** One stakeholder highlighted a concern that the average wait time for free appointments was “significantly more” than for chargeable appointments. Data provided by the Home Office for the monthly average of days until the next free appointment and the next chargeable appointment for each of the SSL core sites from June 2019 until March 2020 confirmed this. An example was a maximum waiting time of 35 calendar days for a free appointment in Birmingham in March 2020 compared to a waiting time of 2 days for a chargeable appointment at this site during the same month. It was also evident that the number of days until the next free appointment significantly exceeded the 7-day service level agreement (SLA) in 5 out of the 6 core sites – the exception being Belfast. This was not the case for chargeable appointments at these core sites within the same reporting period.

7.10 Figure 2 shows the total average number of days until the next available chargeable and free appointments between June 2019 and March 2020 at each of the 6 core sites:



7.11 The Home Office was unable to provide data on wait times for the period before June 2019, stating this was “not recorded centrally”. Furthermore, at the time of inspection in April 2021, the Home Office stated that wait times on appointments had been harder to track following resumptions of service after COVID-19 related suspensions due to the phased approach taken to restart services, and was consequently unable to provide data on wait times from March 2020 onwards. It stated that “wait times for appointments were not recorded” and “data on current appointment times is not available”. Inspectors were therefore unable to verify performance against the 7-day SLA for a broader timeframe.

The UKVCAS appointment booking system

7.12 Submissions from service-users and stakeholders also highlighted a lack of transparency in how the UKVCAS appointment system operates and the way appointments are released. It was felt that free appointments were released in a “very random manner”, and a legal stakeholder stated that practitioners were “forced to stay up till midnight or spend hours on websites trying to book appointments”. UKVCAS call centre agents told inspectors about calls they received from customers enquiring about the lack of free appointment availability, stating that the “the vast majority, if not all appointments” tended to get booked by a certain time in the morning, and a representative from SSL stated that they advised customers to access the UKVCAS booking system at midnight,⁴² upon release of new appointments, as these went “very quickly”.

7.13 Stakeholders also raised challenges around viewing free appointment availability on the UKVCAS website. They highlighted that customers could no longer search for free appointments across all accessible centres, “placing free appointments further out of reach”. Senior managers at UKVI suggested that an improvement that would have an impact would be to make the viewing and booking of appointments easier for customers. They told inspectors that the UKVCAS booking system “exacerbates capacity issues” and described it as “inflexible”.

⁴² While inspectors were told about the release of free appointments at midnight by UKVCAS during the onsite phase which was carried out in April 2021, during the emerging findings presentation, the inspection’s SCS told inspectors that SSL had moved the daily release of free appointments to 9am on 31 October 2020.

The impact of free appointment unavailability

- 7.14** Inspectors observed that ‘free appointment availability’ was featured on the UKVCAS Risk Register. This specified a risk of customers being “unable to book and attend appointments due to unavailability of free appointments” and as a result, “limiting access to appointments to customers who can afford to pay” or “customers delaying their application to await free appointments”. The current likelihood and current impact on the Risk Register are rated as ‘very high’ and ‘major’.
- 7.15** Submissions received from service-users and stakeholders within the UK highlighted instances of customers having to opt for appointments at a cost due to a lack of free appointment availability. One legal stakeholder described an instance where a family of 4 incurred appointment fees of £796, and stated that this instance was representative of 95% of their clients who ended up paying for appointments due to the unavailability of free appointments or waited for weeks to attend one. Another legal stakeholder also raised this, citing instances where customers have had to opt for appointments at core service points costing £120 due to the lack of free appointment availability. Another stated: “Appointments are just not available these days. When they are, it is invariably the paid ones.” This was also evident in a UKVI Customer Insight report produced in February 2021, which highlighted that customers felt that they were forced to pay for an appointment due to unavailability.
- 7.16** UKVCAS call centre agents told inspectors that their first response in such cases where a customer sought a free appointment was to ask whether they would be willing to travel further for an appointment. However, they highlighted that those with travel restrictions or mobility issues tended to wait in order to secure a more local appointment. A legal stakeholder highlighted that while free appointments had previously been covered by approximately 200 Post Offices nationwide, there were now no free appointments available outside the 6 core service points, which meant that between travel costs, time off work and the cost of chargeable appointments, customers were forced to pay “hundreds of pounds more than they would have paid previously”.
- 7.17** There is a KPI which measures appointment availability in the contract and a further KPI in relation to free appointments in the UKVCAS booking system for core sites, which was agreed in March 2020 with SSL: Schedule 7 – ‘Performance Levels’ has been updated to show the detail of all KPIs and this is available on the government’s Contracts Finder website.⁴³
- 7.18** However, with regard to ‘Performance Levels’ these links only provide descriptions of the indicators, for example biometric capture and free appointments, and with regard to severity levels they describe minor, serious and severe KPI failure but there is no actual current data provided on the grounds that they have been “Redacted due to commercial sensitivity”. The performance information shared by the Home Office was from prior to the implementation of the new KPI, and this has therefore prevented inspectors from being able to review the actual/current KPI regarding the target performance levels achieved by the commercial partner (CP).⁴⁴

⁴³ <https://www.contractsfinder.service.gov.uk/Notice/ec5031ea-021e-471a-86cf-af540e8d8efa>

⁴⁴ While the Home Office did provide some information on the performance issues, KPIs and reasons for penalties, details of the total financial amount of service credits imposed on CPs were withheld. As with a number of previous inspections the performance of CPs and other contractual information, which is not already public, was deemed to be commercially sensitive and was not shared with inspectors.

Overseas Visa Application Centre (VAC) network

The availability of free appointments

- 7.19** In contrast to the UKVCAS contract, inspectors observed that the Next Generation Outsourced Visas (NGOV) contract for services overseas did not contain a specific KPI for the availability of free appointments. Instead, there was provision for a Critical Service Level (CSL) with the contract which the NGOV supplier VFS Global (VFS) specifies the target service level metric as “100% of Biometric appointments are available and made within 5 Working Days”. The service description with the TLScontact (TLS) contract mirrors this, stating that TLS must also “ensure that Biometric appointments are available and made within the next 5 working days”. UKVI states: “Appointment availability requirements within both NGOV contracts are the same for both user pay and free to use VACs.”
- 7.20** Central government performance information revealed a rating of TLS and VFS’s adherence to appointment availability within the 5-day SLA (or the next opening cycle of the VAC) as ‘good’ between April and June 2020. Inspectors were, however, unable independently to verify adherence to the 5-day SLA, both during this timeframe and prior, specifically in relation to appointment availability at free-to-use VACs. In response to a request for wait times for free appointments, UKVI stated: “Appointment availability is monitored in live time to ensure that appointments are available within the 5-day SLA.” No data was provided.
- 7.21** Responses to the CfE from customers highlighted difficulties with securing free appointments with NGOV service providers, TLS and VFS, with available slots that “did not last for more than 5 minutes after opened for booking” and all dates being “sold out” for the next month. One described the appointment booking process as a “stressful experience” and another was “forced to pay higher fees – greater than the cost of the visa fee – due to unavailability of appointments”. A stakeholder from the education sector highlighted instances of many customers also “having to opt for priority services as a consequence of appointment availability”, particularly during “surges” in applications.
- 7.22** Such issues were echoed by diplomatic staff overseas, who stated that the local VAC did not consistently have appointment availability and felt that there was a “lack of flexibility” within the system to address customer need. This was further evident in UKVI’s Customer Insight report (February 2021), which recognised feedback from customers who had been unable to book free appointments as a recurring theme.

The transparency of appointment availability and booking systems

- 7.23** Customers also highlighted issues around a lack of transparency and flexibility within appointment booking systems. One described finding a free appointment on VFS’s system as “a lottery” and said that they had to check the website at various times during the night. Another described the booking system as “outdated” and raised difficulties resulting from only being able to see the next available date as opposed to being presented with a list to choose from.

7.24 In the inspection of the Home Office’s Network Consolidation Programme,⁴⁵ the ICIBI recommended that the Home Office publish “service standards and performance data” for VACs, “covering availability of appointments, average waiting times, and any other factors affecting the ‘customer experience’, together with any agreed improvement plans for particular VACs”. On 6 February 2020, in its formal response, the Home Office indicated its intention to “publish more contemporaneous performance data along with other relevant information about the ‘customer experience’”. However, on 17 February 2021, upon request of this performance data, UKVI referred inspectors to data on visa processing times and customer satisfaction results, neither of which covered the availability of appointments and average waiting times. Inspectors noted UKVI had not provided the information they had requested.

⁴⁵ <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-network-consolidation-programme-and-the-onshoring-of-visa-processing-and-decision-making-to-the-uk>

8. Inspection findings: Customer experience and support services

Making an online visa application – accessibility

- 8.1** Under the UK Visa and Citizenship Application Service (UKVCAS) and Next Generation Outsourced Visas (NGOV) systems, customers are required to apply for their visa and pay their application fees online via the Home Office’s digital application service, Access UK, which commits to enabling customers to “make quicker visa applications using an intuitive online form”.⁴⁶
- 8.2** Inspectors noted that the benefits brought by the move from paper-based applications to online and digital methods were widely recognised, and that the call for evidence (CfE) had produced positive views on the Home Office’s digital application service, Access UK. Customers described the system as “generally good” with “everything going well from the filling to the payment stage”, and “easy to use” and “saving much time by not writing everything on paper”, “smooth” and “fairly user friendly”.
- 8.3** One submission stated that the online application system “has become accessible, easier to navigate [and to] complete and submit applications”, and a representative of the education sector felt that this part of the application system had vastly improved. Visa Application Centre (VAC) staff also recognised that digitisation enabled customers to retain their documents, and a senior manager within UK Visas and Immigration (UKVI) described the ‘digital by default’ journey as the “happy path”.
- 8.4** However, there were a range of concerns that were raised in the CfE by individual customers and stakeholder organisations which suggested that the customer experience needs to be improved, starting with:

Functionality of commercial partner (CP) websites

- 8.5** Inspectors heard that Sopra Steria Limited (SSL) aims to provide “a modernised, digital and more secure process for customers to submit key evidence and personal information” and to offer a “fast and convenient self-service with the ability to make applications and upload evidence from home”.
- 8.6** While the convenience of this online process was recognised by customers, they also told inspectors of their concerns in relation to the websites of all 3 CPs who provide biometric enrolment services on behalf of UKVI (VFS Global (VFS), TLScontact (TLS) and SSL). Customers described their experiences as “frustratingly awful”, and said the system can be “dated and clunky” and “full of glitches”. Another customer reported website “crashes” and instances where the inputted information had disappeared. One described the system as “slow and often times non-responsive”, and another told inspectors that “the system jumbles the pages [of evidence]”, creating difficulties in ensuring all had been uploaded successfully.

⁴⁶ <https://www.gov.uk/government/news/new-digital-visa-application-service-now-available-worldwide>

Inspectors noted that VFS's monthly dashboard from September 2019 to March 2020 recognised 'website navigation', 'website information' and 'website road direction' as top areas of customer dissatisfaction.

- 8.7** A legal stakeholder reported that the TLS website was "broken" and the frustration that it had crashed on many occasions when trying to submit a request, and another stakeholder described issues ranging from the inability to upload documents to websites, to the website crashing during payment, resulting in multiple payments for a single application.
- 8.8** Diplomatic staff based overseas described both CP websites as "tedious to navigate", and TLS's desk agents told inspectors that the TLS website often caused customers difficulties when uploading documents.
- 8.9** UKVI's Customer Insight report echoed such views around CP websites lacking a user-friendly interface and technical issues preventing customers from uploading their own documents. It also highlighted the applicability of these concerns to the SSL website. Furthermore, service-users expressed frustration at the many times the SSL website would crash, or "automatically time out after approximately 20 minutes of being logged in", resulting in a failure to upload documents or the process taking time "over several sessions". Difficulties customers experienced with uploading documents onto the SSL system were also flagged to a Member of Parliament.

Added Value Services (AVS)

- 8.10** As part of the NGOV and UKVCAS contracts, CPs may offer AVS to customers at an agreed price. These are optional and aim to enhance the customer experience.
- 8.11** All the AVS feature prominently on the respective websites of the CPs and are seen as part of the appointment booking process, with TLS describing AVS as "designed to enhance your visa application experience" and VFS stating that AVS provide "specially crafted optional services to ease your visa application process" and with Premium packages offering a "great discount on services designed to make your visa application an easy, effortless process". SSL describe AVS as follows: "you can also buy extra services to make your appointment as easy as possible".
- 8.12** In determining AVS charges, the Home Office told inspectors that for any proposed AVS:

"the commercial partner will complete an AVS proposal and submit this to UKVI. This form will be shared with UKVI regional leads, integrity teams, Strategic Communications and Home Office Commercial who will give their views and ask any questions about the service. This feedback will be shared with commercial partners and if the UKVI internal teams are satisfied with the responses and proposal, this will be escalated to UKVI senior management for sign off. Once agreed, the commercial partners will be notified. UKVI will only refuse an AVS if it presents a conflict of interest or potential reputational damage to UKVI. UKVI can ask for the AVS to be withdrawn at any time if there is a change in circumstances, meaning that the AVS would cause reputational damage or present a conflict of interest [...] Commercial partners do also increase their AVS prices from time due to inflation and UKVI reviews the reasonableness of these increases."
- 8.13** Inspectors were told by UKVI and CPs that the purchase of these services is absolutely voluntary and that no 'hard sell' takes place, but stakeholders and customers do not necessarily feel the same way.

- 8.14** UKVI stated: “Whilst our commercial partners may offer added value services to customers, these are optional and aim to enhance the customer experience.” UKVI’s customer satisfaction results, however, showed that between January 2019 and August 2020 72% of customers overseas and 75% of customers in the UK felt that they had to buy AVS to get a good service. In the responses from the CfE, not only was it evident that customers felt “forced to pay” for a biometric appointment due to a lack of free appointments, but it was also felt that difficulties relating to uploading documents compelled applicants to pay for scanning services.
- 8.15** Inspectors were told in the responses to the CfE that, due to the complicated nature of the available guidance and the way these AVS are packaged on the website, some customers are uncertain as to whether they should purchase these services to ensure that they get the process right:
- “It is unclear to the layperson whether buying added value services will influence how their application is viewed by UKVI [...] unrepresented clients are not clear which services they are required to purchase, if any, in order to make their application valid [...] and [this] has the potential to add additional financial burdens to people engaging in an already costly process.”
- 8.16** This was reinforced by the Law Society who stated that there is a:
- “serious concern as individuals making visa applications may be particularly vulnerable due to the complexity of the immigration process and the importance of the issues at stake, and as a result, induced into paying more money than is necessary in an attempt to influence the success of their application. Whilst the commerciality of the companies providing FES [Front End Services] is recognised, vulnerability of applicants should not be exploited to garner profit.”
- 8.17** Inspectors’ attention was drawn to the ‘Document Checking’ service as a further example of an AVS that plays on the customer’s anxiety to get their application right. This ‘Document Checking’ service offered by SSL is separate to the ‘Document Scanning’ service and involves SSL employees checking the uploads to confirm whether an applicant has already uploaded their documents prior to their appointment, at a cost of £44.99 when attending an appointment at a core site, or included in the costs of an appointment at an Enhanced service point or Premium Lounge. A concerned legal representative commented: “Considering that many applicants have already had to pay to attend an appointment that may cost up to hundreds of pounds, it is inappropriate that they may feel they should pay further costs to ensure that their documents are uploaded correctly.”
- 8.18** Overseas mission staff also expressed concern that the “upselling” of AVS could cause reputational damage to the UK overseas, stating that:
- “there are applicants being persuaded to buy unnecessary additional services at the VACs [...] The most recent contract with external commercial partners has meant that it is through ‘upselling’ these additional services that partners make their money, but there is an inherent reputational risk here for UK plc. This is important as the visit to the VAC is often customers’ first experience of the UK, and their treatment may therefore have a disproportionate impact on perceptions of the country.”
- 8.19** This is reinforced by the comments that the “[s]ole focus is income generation. The human aspect is not at all valued. Customers are not happy with the system in place with TLS and fall back is on the British High Commission.”

8.20 Stakeholders told inspectors that the more fundamental issue is that applicants are unsure which paid-for services they need to buy, and which are purely optional. It is unclear to them whether buying AVS will influence how their application is viewed by UKVI and whether it will affect the outcome of their application:

“Unrepresented clients are not clear which services they are required to purchase, if any, in order to make their application valid. Similarly, clients are offered free or paid appointments, there is often confusion as to whether they are required to pay for an appointment to ensure that their application is made in time. The advertisement of private services (when they are not essential and merely an add-on) is misleading and has the potential to add additional financial burdens to people engaging in an already costly process.”

Biometric reuse and the Identity Verification (IDV) app

- 8.21** In response to the closures of the UKVCAS service points and Service Support Centres (SSCs) in 2020 due to COVID-19, to increase capacity and reduce customer contact where possible, UKVI began reusing existing biometrics (fingerprint and photograph) for some customers who had supplied these in previous applications, avoiding the need for those customers to attend a service point when reapplying for a visa. Those customers who were eligible and had reusable biometrics were invited to use the IDV app, enabling UKVI to verify their identity remotely. This process continues to be used for student applications applying for extensions or subsequently, and UKVI stated its intention to consider the future role of biometric reuse as part of its delivery of the Future Borders Immigration System (FBIS).
- 8.22** Customers felt that there had been a lack of communication around the roll-out and process, describing it as “completely ambiguous” and “vague”. One reported difficulty with using the app to submit documentary evidence, stating that all documents had to be resized and formatted, and highlighted the absence of a functionality enabling customers to view their documents before submission. Legal representatives also highlighted a data protection issue with the IDV app whereby legal practitioners completing forms on behalf of clients had to share their login details with their clients to enable them to take their photo. They emphasised that “systems should be designed so that both represented and unrepresented persons are able to use them effectively”.
- 8.23** Despite this, the benefits of biometric reuse and the IDV app were recognised by customers and their representatives. A legal stakeholder highlighted the benefits of the IDV app in that it offered customers an alternative to attending a service point, and that this option brought improvements to FES overall. Moreover, during the onsite phase of the inspection, a VAC manager told inspectors the introduction of such initiatives for customers overseas would increase efficiencies in how customers can be supported.

Accessibility of service point locations – NGOV

- 8.24** Inspectors were told by the Home Office that the location of a VAC is driven by several considerations, including the volume of applications that are likely to be made there. The contract sets out a list of mandatory locations in which the CPs must offer VAC services. Requests to open new VAC locations are considered on an individual basis. TLS and VFS work with stakeholders and UKVI teams to determine new areas of demand, and where demand is identified these customers are serviced either by an on-demand service or by a discretionary VAC where volumes are fully tested. They also indicated that they have not had to close any locations mandated in the contract although as described above, CPs test demand in new places from time to time through discretionary VACs which may or may not become viable. There is also a plan to undertake a review of the current VAC footprint in light of COVID-19.
- 8.25** ‘An inspection of family reunion applications (June – December 2019)’ reported numerous stakeholder concerns about customers having to make “difficult, dangerous and expensive journeys, in some cases crossing into another country, possibly more than once, just to attend a VAC appointment”.⁴⁷ Recommendation 5 of this report stated:
- “The Home Office should ensure that the reporting from and oversight of the operation of Visa Application Centres (VACs) is sufficient to understand in detail and respond quickly to any practical or other obstacles affecting their accessibility for family reunion applicants, including: where they are located and whether alternative solutions (for example, mobile biometric clinics) may be required; the availability of free appointments; recognition of the particular circumstances of family reunion applicants, so that they are not met with unreasonable demands for documentation, return visits and fees.”
- 8.26** The Home Office partially accepted this recommendation:
- “UKVI has processes in place to ensure that the information provided to commercial partners abroad allows them to identify family reunion applicants [...] It is not economically viable for UKVI to have VACs in every country across the world. The VAC footprint is driven by a number of considerations, including the volume of applications that are likely to be made at it; UKVI cannot commit to opening new locations or offer alternative solutions in locations where volumes are low, but will keep the footprint of the VACs under review.”
- 8.27** The Home Office also indicated that it would “improve commercial partner training and operating procedures to ensure that family reunion applicants are managed in VACs to provide best possible customer service to meet their administrative needs”.
- 8.28** A report by the British Red Cross, ‘The Long Road to Reunion: making refugee family reunion safer’,⁴⁸ published in 2020, found that, of the 100 families surveyed as part of the research methodology, 29% found the journey undertaken to reach a VAC to be ‘quite difficult’ or ‘difficult’, and 20% reported it as ‘very difficult’.
- 8.29** At the time of this inspection, it was evident that the geographical accessibility of VACs continued to be an area of concern. Diplomatic staff in one West African country told inspectors that customers were required to travel to the capital of a neighbouring country for biometric enrolment, with road conditions meaning that the “difficult and costly” journey could take “up to 10 hours”. Similar issues were raised by a Middle Eastern country which highlighted

⁴⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/924812/An_inspection_of_family_reunion_applications_June_December_2019.pdf

⁴⁸ <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/improving-the-lives-of-refugees/refugee-family-reunion>

geographical accessibility to a VAC as one of the most common difficulties faced by customers, stating that most were required to travel a long way, sometimes across borders, which was “expensive”. Some service-users also felt that support for vulnerable applicants unable to travel to a VAC was “lacking terribly”. A senior manager in UKVI recognised such concerns through insight received from the Foreign, Commonwealth & Development Office (FCDO), and UKVI’s Customer Insight report additionally revealed that “customers felt some of the VACs were hard to locate or located in inconvenient places.”

8.30 The All-Party Parliamentary Group (APPG) for Africa informed inspectors that their 2019 enquiry⁴⁹ had indicated that:

“though most countries are now covered by one or more of the 32 VACs in Africa, at the time of the APPG inquiry, 24 African countries had no local VAC⁵⁰ so applicants have to visit a neighbouring country to apply for a visa and undertake interviews. This imposes significant costs, inconvenience and in some cases hardship on African applicants.”

8.31 Inspectors were keen to understand what progress had been made on accessibility and supporting family reunion applicants and asked for details of the additional training given to CPs, with a narrative explanation of the improvements that have been delivered. On 7 March 2021, the Home Office told inspectors that:

“UKVI continues to work with Commercial Partners to identify ways to improve the customer journey for family reunion customers. A National Asylum Stakeholder Forum (NASF) – Refugee and Family Reunion Sub-Group meet quarterly to focus on the outcomes of the ICIBI Inspection and discuss actions to implement the recommendations. This board consists of members from case working and supplier relationship teams as well as representatives from external bodies such as the Refugee Council, British Red Cross, Greater Manchester Immigration Aid Unit, the UN Refugee Agency and the Immigration Law Practitioners Association. The next group will meet in early March 2021.”

8.32 Stakeholders noted that the Home Office’s engagement with the NASF is a good example of positive action. On 10 June 2021, the British Red Cross, which co-chairs this forum, told inspectors that they:

“found this sub-group very useful and can feedback that it is working well. The first meeting was in December 2020 and has met quarterly since. The sector has been able to raise a wide range of operational and policy issues such as the outcome of the ICIBI inspection, impact of COVID-19 on applications, decision-making and application processes. It is a useful forum to feedback where policies are not working operationally (e.g. printing of National Insurance numbers on Biometric Residence Permits which is now resolved) and has ensured better stakeholder engagement on updates to family reunion, particularly on processes such as onshoring of applications to Sheffield.

49 This submission draws heavily on the 2019 joint APPG inquiry and subsequent policy report ‘Visa Problems for African Visitors to the UK’ (published July 2019) and follow up work of the APPG for Africa and also the Royal African Society. The original inquiry and policy report were led by the APPG for Africa, together with the APPG for Malawi and APPG for Diaspora & Development and was supported by the African Studies Association UK, The Royal African Society, the Scotland-Malawi Partnership and AFFORD-UK.

50 Benin, Burkina Faso, Burundi, Cape Verde, Central African Republic, Chad, Congo Brazzaville, Comoros, Djibouti, Equatorial Guinea, Eritrea, Eswatini, Gabon, Guinea, Guinea Bissau, Lesotho, Liberia, Libya, Mali, Mauritania, Niger, Sao Tome and Principe, Somalia and Togo. The following countries have only a part-time VAC (i.e. not open all working days) which can slow down the process: Ivory Coast (twice a week) and Madagascar (twice a month). Source: <https://www.gov.uk/find-a-visa-application-centre> (last accessed 20 June 2019).

“We have been able to discuss our report Long Road to Reunion and present its finding through this group and the Home Office are considering our recommendations. We have continued to raise issues with VAC access as well. With the upcoming changes to immigration we think this forum will be invaluable in our efforts to ensure family reunion is an accessible and safe route for separated families.”

8.33 With regard to ‘additional training’, the Home Office informed inspectors that the UKVI Central Operations team had issued a safeguarding CP awareness pack to SSL and additional guidance on safeguarding had been issued to SSL, but no awareness pack has yet been developed for overseas CPs. At the time of writing, the team is currently working on producing a similar safeguarding training package for TLS and VFS. Inspectors were not told when this would be ready.

8.34 Inspectors also asked about the number of safeguarding referrals received from CPs and were told by the Home Office:

“We are unable to provide the number of safeguarding referrals made by TLS and VFS as these are not recorded centrally. Where potential safeguarding concerns are suspected, these are notified to the relevant decision-making centre and the UKVI Regional Integrity managers by email or phone in accordance with UKVI requirements. UKVI are engaging TLS and VFS to discuss changes to include safeguarding referrals and concerns in incident reporting in future.”

8.35 What the inspectors ascertained from the above is that since the publication of the ICIBI report on family reunion applications in October 2020 and the subsequent Home Office response, safeguarding training remains a work in progress for overseas VACs managed by TLS and VFS. In-country provider SSL have been provided with safeguarding guidance, and this resonates with findings on guidance from this inspection, which indicated that in-country there is a clear understanding of the requirements around safeguarding and vulnerability, but the same cannot be said of overseas CPs.

Accessibility of service point locations – UKVCAS

8.36 Concerns around geographical locations and accessibility of VACs were a recurring theme in UKVI’s Customer Insight report, which found that “customers felt that they were forced to travel long distances to attend their appointment”, both in the UK and overseas. One UKVCAS customer stated that there needed to be “more core service points”, describing their options for locations offering free appointments as “frankly unacceptable”.

8.37 A stakeholder in the education sector described previous UKVCAS biometric enrolment in Post Offices as “more convenient and cheaper” than the current system of limited free appointment availability at the 6 core sites, and a legal stakeholder highlighted the lack of accessibility and choice of core sites from certain locations, citing Bournemouth as an example where customers were sent to the service point in Croydon in “99% of cases” to access a free appointment. A Member of Parliament told inspectors that many of the appointments available required an applicant to travel “hundreds of miles” to attend, and inspectors found that submissions from service-users also raised this as an issue, with one highlighting the higher number of Enhanced sites compared to core sites.

Assisted Digital (AD) services – support for customers making applications within the UK

- 8.38** The provision of Assisted Digital (AD) services by ‘We Are Digital’ (WAD) is governed by a service level agreement (SLA) which sets out that 95% of those in scope for support⁵¹ should be appropriately triaged within one day of their enquiry, and that 50% of the agreed vulnerable population⁵² should be given face-to-face support (or the reason why not established) within 5 days of their enquiry. Customers requiring telephone support are usually offered an appointment within 48 hours and those who request a face-to-face appointment are usually able to attend at a time of their choice within 5 to 10 days. In October 2020, UKVI stated that these SLAs had been “consistently achieved throughout the course of the contract”.
- 8.39** Furthermore, a review of ‘We Are Digital’ (WAD) performance by their managers for September 2020 reported that 82.8% of all service-users in September felt that receipt of WAD support had improved their skills and abilities in being able to use a PC or smart device (or similar) in order to complete their visa application, with 14.3% reporting no change in confidence and 2.9% reporting a decrease in confidence.
- 8.40** Inspectors queried whether the Home Office undertook any audits of AD performance and the impact of their service on customers, apart from the self-assurance that is provided by AD through its own performance Management Information. The Home Office responded that they “have never done this to date – pre-Covid, we would have a meeting and we look to see informally how they are performing.”
- 8.41** While WAD targets were currently being met, inspectors wanted to understand how the services were impacting on customers. Home Office managers indicated that this remains a work in progress as they are not sighted on the actual referrals that go through WAD: “a difficult question and we do not see a completed application”.
- 8.42** Responses to the CfE also raised a concern that those who would benefit from the service may lack awareness of its existence, and recommended that UKVI needed to do more to promote such services to vulnerable people and those at risk of digital exclusion.
- 8.43** This concern was echoed by a representative from WAD who felt that the reach of publicity for AD services was insufficient and cited challenges encountered from the Home Office that hindered promotional capability. Inspectors enquired as to how the guidance and services of WAD were advertised and were told that the “main access point was through GOV.UK”, and this is a problem as “GOV.UK is not user friendly – you could type in a search and it comes back with lots of irrelevant results”.
- 8.44** Moreover, inspectors noted that the AD contract did not require the provision of support in any languages other than English or Welsh despite a suggestion by WAD to offer interpretation services. Instead, there was a reliance on WAD staff with “other language capabilities” to support customers “as part of their interaction”.

51 ‘We Are Digital’ (WAD) decides if someone is in scope for assistance by establishing whether they have access to a computer or whether they can get support from a family member. Some calls are also from people seeking immigration advice – these are rejected.

52 WAD do not have established criteria for which callers they consider as vulnerable.

Support for customers making applications from outside the UK

- 8.45** Despite requirements for customers based overseas to apply for a visa using online methods, inspectors observed that an equivalent free-of-charge service to support digitally excluded customers applying from overseas was not available. UKVI stated: “There is currently no contractual AD support given for overseas applicants.” A legal stakeholder highlighted a “disproportionate impact on vulnerable groups”, with “the effect of excluding those without access to computers or high levels of computer literacy”.
- 8.46** Staff based in VACs overseas had also identified the need for such a service. A VAC supervisor told inspectors that this was a “common call for help”, and a senior manager at a VAC expressed that “support and language help is needed”, citing instances where customers had experienced difficulties when filling out their application form online, also stating that there was a lack of free support and customers had to seek assistance from family members in the UK. One manager described such challenges experienced by customers as “a common problem”, and a supervisor of another VAC informed inspectors that most customers required ‘agents’ to assist them with filling in their form. In the absence of free-of-charge assistance, customers were advised to purchase an ‘application form-filling’ AVS or to contact Sitel for assistance, for which there was a charge.

Customer insight/customer experience

- 8.47** The Home Office told inspectors that the work of drawing upon customer insight and communication to shape the FES customer journey and experience sat with the Customer and Commercial Services (CCS) team. Formed by UKVI in 2017, the CCS team was said to be:
- “developing into a function that combines the management of our customer facing supplier relationship services together with customer insight, experience and more recently stakeholder and communications to focus on both business as usual (BAU) and improvements around providing a high excellent customer services.”⁵³
- 8.48** Inspectors were provided with examples of work that had been undertaken to improve the customer journey. One was the ‘Integrated Online Customer Journey (OCJ)’, which gave customers more service options when applying for their visa: “The OCJ means customers now move seamlessly from Access UK to the FES provider website (TLS, VFS and SSL) where they can book their appointment and purchase additional services where previously customers had to log in to 2 separate websites to apply and book appointments.” Digitisation of applications has been part of this change in order to “receive documentation quickly, efficiently and it has created flexibility in the case working world as documentation can now be moved to any DMC [Decision Making Centres] digitally.”

⁵³ While CCS was set up in 2017, the Customer Experience team was not set up until mid-2018.

8.49 Other initiatives are as listed below:

- improvements to the in-country customer journey
- improvements to the payment journey
- Customer Notifications Pilot
- new Visa Processing Times Tool
- gathering and processing insight

8.50 The Home Office told inspectors that there is now a large amount of activity by the CCS team, in close collaboration with CPs, to analyse customer and stakeholder insight. Examples of how the insight is gathered and processed include:

- the introduction of complaints workshops with representatives across all customer contact touch points to enhance consistency, accuracy and digestibility of information accessible to customers
- development of an internal insight capture mechanism, Enterprise Feedback Management System (EFM) with TLS, which issues surveys to customers at different points of the customer journey allowing specific analysis and improvements to be taken forward
- the introduction of a Premium sponsor exit survey to be sent to any Premium sponsor that decides to leave the paid-for service to capture feedback
- the circulation of the COVID-19 restart survey to capture insight from stakeholders on customer concerns during COVID-19
- external stakeholder engagement events hosted by the External Relations team with the objective of disseminating information and understanding stakeholder concerns
- the introduction of thematic insight working groups with representatives from across UKVI to discuss solutions and improvements that can be made from customer insight
- annually hosted Premium Business and Premium Education Sponsor Events providing an opportunity for engagement and for sponsors to raise questions and concerns
- customer segmentation research to increase UKVI's understanding of and the differentiation between its customers and how they access and utilise UKVI services
- specific research on the priority visa service standard for the citizenship route to assess the level of customer demand
- the development and regular review of customer insight metrics with TLS and VFS via their revised performance dashboards

8.51 Inspectors were also provided with examples of the internal CCS weekly note which is distributed to senior managers in UKVI. These set out the key activities between the teams dealing with strategic engagement, future supplier services and customer experience, and they signpost activities taking place across the workstreams.

8.52 Based on what was shared with inspectors by the Home Office and some of the feedback inspectors received from staff, it was clear that UKVI understood the importance of customer insight and experience, and is investing a lot of effort in making this an integral part of its continuous improvement journey in developing and enhancing the FES offer to its customers. However, while there was a clear recognition by UKVI staff that a lot of positive work is in place with developing customer insight, there remained some concerns.

- 8.53** Inspectors were told by staff and managers that the individual teams were really committed and enthusiastic about the work that they were doing but future resourcing of the teams will need consideration. Staff indicated that their perception was that “there is only a small number of people looking to address a whole range of issues”.
- 8.54** Staff also commented on the need to understand how policy and operational development can be enhanced by customer insight in a way which looks to bring them together through some sort of clear design strategy “that looks to see how we weave/articulate the customer insight outcomes into policy/operational development, delivering implementation which addresses customer need”. Inspectors are aware from the information provided by the Home Office in relation to the CCS work that some of this is already underway, and it may be useful to reiterate this to staff.
- 8.55** With regard to CPs, senior managers in the Home Office told inspectors that a “more rounded collaborative approach between UKVI and CPs to deal with insight is needed – the CPs capture their own insight and we do plan to look at it in a more rounded nature, but we don’t do this yet.” UKVI staff working on customer insight told inspectors that currently the contact with CPs is limited and more close working with CPs would be a positive step.
- 8.56** CPs have also reflected similar views on the question of collaboration, with more needing to be done to create a sense of partnership, with a senior CP manager suggesting a “change board mechanism which helps us understand what is coming down from an early stage, so that we can work more on a collaborative basis and be seen as a true partner rather than being informed on a need-to- know basis”. The underlying message was that more openness and collaboration and developing a true sense of partnership will lead to a better and positive working relationship.

9. Inspection findings: Training and development for staff

Mandatory training for Home Office staff and commercial partner (CP) staff

- 9.1** Inspectors asked for details of all Home Office mandated training for CPs and Home Office staff, including customer service, safeguarding and imposter detection training.
- 9.2** Inspectors were told by the Home Office that they regularly “issue guidance, local instructions, training materials, operating mandates and best practice documents to Home Office staff and CPs about the provision of FES [Front End Services]. It was not possible to provide every piece of training material which has been issued to CPs or internally to Home Office staff as these are not centrally recorded,” however they did provide some examples.
- 9.3** Inspectors were told that the following training courses are mandatory for all Home Office staff, both in this area and throughout the organisation:
- Diversity and Inclusion
 - Health and Safety
 - Responsible for Information (an information security course)
 - Race Awareness
- 9.4** In addition, Senior Civil Servants are required to complete 3 further courses:
- Inclusive Leadership (a workshop)
 - Becoming Disability Confident (e-learning)
 - Health and Safety for Senior Civil Servants (a workshop)

Service and Support Centres (SSCs)

- 9.5** SSCs are provided with a wide range of Home Office training including (but not limited to) instructions on:
- Immigration controls
 - SSC professional standards
 - SSC and wider Home Office IT systems
 - Home Office systems user guides
 - Immigration routes and scenarios
 - UKVI best practice
 - Use of interpreters
 - Interview techniques

Training for FES CPs

- 9.6 The Home Office indicated to inspectors that guidance, training materials and operating mandates are provided to the CPs about the provision of FES as indicated below.

Next Generation Outsourced Visas (NGOV)

- Personnel Security Clearance
- Document Scanning and Vignette Handling
- Biometric Kit
- Remote Printing

UK Visa and Citizenship Application Service (UKVCAS)

- Home Office Biometric Programme – Biometric Capture Best Practice
- Government Security Classifications
- Data Sharing and Transfer Guidance
- Health and Safety Risk Management Policy
- Statutory guidance to the then UK Border Agency on making arrangements to safeguard and promote the welfare of children, published in 2009 by the then Department for Schools and Families

Post Office Limited (POL)

- 9.7 POL issued staff with a training workbook called the 'UK Border Agency Front Office Service Training Workbook' which covered how to perform the biometric enrolment duties, counter procedures and safeguarding and cultural sensitivity.

'We Are Digital' (WAD)

- 9.8 The contract with WAD stipulates that they should have training in place for core topics, and WAD deliver their own training internally, comprising Anti Bribery and Corruption, Equal Opportunities, Extremism and Anti-Radicalisation, Health and Safety, Safeguarding Policy and Procedure, and Whistleblowing Policy. Training is delivered to WAD staff at the point of onboarding and is available for review at any time. Additional training is provided where there is sufficient demand or where there are significant changes to the service and when the Home Office provide training materials for new routes.

Delivery of staff training

- 9.9 The exact methodology used for staff training varies between CPs. Inspectors were told by CP managers that training regimes were in place, with staff trained to perform their roles including ID checks, biometric enrolment and checking and uploading documents. Completion and monitoring are managed through training logs.

Training for Sopra Steria Limited (SSL) staff

- 9.10** Separate to their own onboarding, UK Visas and Immigration (UKVI) training materials and guidance are cascaded through managers within UKVCAS and then through team leaders to desk staff.
- 9.11** Inspectors were told by CP staff that the materials and guidance were given to staff in hard copy and kept on the company's intranet, with staff indicating: "Yes, we get updated all the time. The instructions are given to us by handouts or we can look through folders on the computer. If there's a new instruction, we'll be told about it one-by-one. Managers will deliver individual updates."
- 9.12** SSL staff indicated that they generally understand their roles and responsibilities and, when inspectors asked staff to describe their roles, staff were able to do so with an understanding of what the expectations were, stating: "we are processing assistants; we process the application, go through optional documents and mandatory documents for applicants, ensure documents are uploaded properly and ask them to re-upload if necessary. We also capture biometrics."
- 9.13** UKVCAS staff have also received safeguarding training in person from UKVI staff which they indicated was helpful:
- "We also had safeguarding training, it was from UKVI. This covered certain scenarios and it made me realise I've actually seen something [...] We can tell our team leader or tell security."
- 9.14** They also had online UKVI forgery and imposter detection training delivered to them, and inspectors were told they had knowledge of forgery and imposter detection methods.

TLContact (TLS) and VFS Global (VFS)

- 9.15** TLS and VFS run their own staff training programmes internally, with materials being sent from UKVI and cascaded down to TLS and VFS managers. Inspectors were told:
- "The most recent one [piece of training material from UKVI] is the guidance training for vignette management. And the authorised staff went to DMCs [Decision Making Centres] for further training on this."
- 9.16** TLS maintain an online resource on their intranet called 'OpsWiki'. TLS staff can access this whenever they need to with a manager, indicating:
- "They [UKVI] share guidance with us and it's available on OpsWiki – those who want to read more can do so. Staff always have time to do this. The first time a piece of information is shared with me, I share it with some special notes. Because they practice it every day during the operation, there is usually no need for them to get refresher information. But sometimes when it's something that isn't common, they can clarify it."

SSCs

- 9.17** Inspectors were told by SSC managers that training materials for SSC staff are kept on the Family and Human Rights (FHR) hub, and are accessible to staff, however it is not always easy for staff to find the information they need. Key pieces of guidance are shared with SSC managers who brief their staff, and inspectors were informed by staff that:

“We have a central team and they send the guidance to the command – some guidance goes to managers and we’re expected to brief our teams. Guidance is also stored on the FHR hub. It can take time to open but the people who deal with the hub always clear the guidance if something has an error or is out-of-date. It’s definitely easier to use Horizon because ‘it can take forever to find it on the hub’.”

WAD

- 9.18** WAD staff are trained in-house. This is monitored internally by WAD’s own quality assurance (QA) regime. Inspectors were told:

“In terms of QA, our agents are regularly QA’d – their calls are listened to in order to ensure they’re directing people correctly – this is consistently above 95%. For our network, we QA 10-15 of the appointments at random. This takes place over the phone. We have a set criteria that the network is marked against [...] Pass rates are very high.”

Providing immigration advice

- 9.19** TLS, VFS and SSL staff interviewed for this inspection understood the limitations of their roles and their responsibility not to give immigration advice, which they are not qualified to do. They noted some frustration with not being able to advise customers when they knew the answer to the query at hand, however they understood the dangers of unqualified staff giving immigration advice without full training in the Immigration Rules, or a full understanding of the customer’s case.
- 9.20** Although this inspection heard some UKVCAS and NGOV staff describing the limitations of their roles correctly with regard to ‘immigration advice’, some stakeholders raised the issue of Visa Application Centre (VAC) staff giving unwanted and incorrect immigration advice, indicating that they were “concerned about UKVI’s commercial partners offering unsolicited advice and influencing applicants in respect of the evidence that they should submit. Members have provided examples of how clients faced staff who were acting as gatekeepers and imposing additional evidentiary requirements.”
- 9.21** Inspectors were further informed through submissions from stakeholders that VAC staff should not be offering advice they do not have the legal competence to deliver:

“Officials at these centres are not practising lawyers and so it is deeply concerning that they are providing legal advice when they are not qualified or regulated to do so. If officials were to provide incorrect advice to an applicant regarding evidence, the application may be refused, and it is unclear what remedy would be in place.”

Staff training on safeguarding, vulnerability, imposters and forgery

- 9.22** Inspectors also looked at the guidance and training provided by the Home Office on safeguarding. While there was clear reference to this in the information provided by the Home Office for SSCs and SSL, this was absent in the information from NGOV. This again was reflected in the interviews with staff, where inspectors found a good understanding of safeguarding issues and concerns with SSC and SSL staff, but less so with NGOV whose front-line staff were unclear about the definition of safeguarding.
- 9.23** Inspectors were told in the focus group sessions with overseas NGOV staff when asked about vulnerability and safeguarding that “for some women who have little babies we will provide them with a single room [...] some elderly people have wheelchairs and the doors are wider/rooms are bigger”, and nothing more was explained even with inspectors prompting, indicating a vague and basic understanding of the requirements as outlined in Home Office safeguarding guidance.
- 9.24** Inspectors were also told by NGOV staff that there is “no audit in place from UKVI to check how guidance is being delivered to desk agents and impacting on practice”. When staff were prompted further by inspectors with examples such as trafficking, mental health issues and exploitation, there was a vague recollection that there might have been some training, but the consensus from staff was: “keep calm and report to [a] supervisor”.
- 9.25** When inspectors sought clarification on the provision of safeguarding training for CPs, the Home Office told them that “the UKVI Central Operations team issues a safeguarding CP awareness pack to SSL. The team are currently working on producing a similar safeguarding training package for TLS and VFS.”
- 9.26** The Home Office did not provide inspectors with evidence that demonstrated they held central records which would show how many referrals are made by CP staff to flag safeguarding concerns, forgeries or imposters. Procedures are in place for these referrals to be made, for example, staff can email a dedicated email address or put notes on applications, however inspectors were not provided with evidence of any centrally held records or analysis of trends.

10. Inspection findings: Assurance

Biometric enrolment

- 10.1** In accordance with the ‘Statement of Requirements’ (Schedule 2) of the UK Visas and Citizenship Application Service (UKVCAS) contract, Sopra Steria Limited (SSL) is required to “ensure that all Biometric Data (biographical data, 10-finger scans, facial images and signature) is captured, collated and transmitted to the Authority in line with the Authority’s ‘Best Practice for Biometric Capture’ document”. UK Visas and Immigration (UKVI) reported that between November 2018 and October 2020, there had been 912 instances where biometric enrolment failure had occurred as a result of an error by the commercial partner (CP). In such cases, these are noted as failures in ‘Key Performance Indicator (KPI) reports’ and follow-up actions are made internally by SSL.
- 10.2** The Next Generation Outsourced Visas (NGOV) contracts also detail a requirement for VFS Global (VFS) and TLScontact (TLS) to “ensure that Biometric Samples are recorded to meet the Authority’s Immigration and Asylum Biometric System Standards where these apply”. Between November 2018 and October 2020, there were 65 biometric failures, from 3,078,699 biometrics taken (0.003%), at Visa Application Centres (VACs) run by VFS (where the error had related to VFS processes), and there were 51 instances of biometric enrolment errors on UKVI-supplied equipment at VACs run by TLS. UKVI told inspectors it has a dedicated team that works closely with CP teams to ensure immediate escalation and resolution following live service issues, and to apply lessons learned. Furthermore, failures are captured on ‘heatmaps’ and ‘scorecards’ and are discussed as part of monthly performance meetings.

Digitisation of documents

- 10.3** Where a customer has chosen not to self-upload their supporting documents, the ‘Statement of Requirements’ (Schedule 2) of the UKVCAS contract stipulates: “The Supplier shall be responsible for digitising Supporting Evidence received from the Customer, or from representatives on behalf of the Customer, as per the Authority’s ‘Standard Operating Procedure’ document and transmitting the Supporting Evidence to the Authority in accordance with Schedule 7 (Performance Levels (KPIs)).” UKVI reported that where digitisation of documents had failed, caseworkers wrote to customers to obtain their documents.
- 10.4** A Critical Service Level (CSL) relating to the digitisation of documents was introduced into the NGOV contracts in March 2020, and due to COVID-19 related closures thereafter, data on the number of instances where the digitisation of documents had failed for TLS and VFS was limited. The available data showed that between June and September 2020, TLS had 10 instances of errors and VFS had a significantly higher number of 340.⁵⁴

⁵⁴ At the factual accuracy check, the Home Office indicated that the VFS figure was misreported in the data that was provided originally by VFS: 175 is the correct figure.

Safeguarding requirements

- 10.5** Inspectors were told by the Home Office: “Safeguarding provisions are included in all our front-end contracts, including those with VFS and TLS.” In March 2021, UKVI told inspectors that 14 safeguarding incidents had been reported to UKVI by SSL since December 2019. Despite the existence of safeguarding provisions in the NGOV contracts, UKVI stated: “We are unable to provide the number of safeguarding referrals made by TLS and VFS as these are not recorded centrally.” In the absence of such data, it was unclear how the Home Office was able to monitor performance of TLS and VFS against this provision.
- 10.6** At Service and Support Centres (SSCs), UKVI explained that safeguarding concerns are categorised as ‘minor’ or ‘serious’. The latter are referred to the Family and Human Rights Unit (FHRU) Safeguarding team. Locally held data revealed that in the business year 2019/20, SSCs had made 201 ‘serious’ safeguarding referrals to the FHRU Safeguarding team. In the first 3 quarters of 2020-21, it made 48 referrals. UKVI told inspectors that for ‘minor’ referrals: “The information does not exist in a reportable format, but local records are maintained by Croydon SSC.”

Customer identity and document checks

- 10.7** The ‘Statement of Requirements’ (Schedule 2) of the UKVCAS contract with SSL specifies that prior to digitising a customer’s passport or travel document, the supplier should “compare the customer’s passport photo against the customer” and “conduct a check as prescribed by the Authority of the passport’s optically variable safeguards and watermarks in accordance with the Authority’s training”. Additionally, Schedule 2 of the NGOV contracts with TLS and VFS stipulates the requirement for the suppliers to “check and confirm the identity of the Visa Applicant against their passport/travel document image while they are physically present”.
- 10.8** Inspectors were told that UKVCAS desk staff were able to indicate their suspicions of fraudulent documentation to UKVI casework teams by ticking a ‘fraud flag’ box during submission. The number of documents suspected of being fraudulent from March 2019 to March 2020 were 222, and a further 494 referrals had been made from March 2020 to January 2021.
- 10.9** In contrast, the Home Office told inspectors that 100% of TLS staff and 95% of VFS staff working in VACs had completed the National Document Fraud Unit (NDFU) and the EU/EEA Identity Card Fraud Awareness training packages. However, as of 1 February 2021 the Home Office was unable to provide inspectors with records of fraudulent document and imposter referrals made by TLS or VFS staff. UKVI stated: “We are unable to provide the number of fraudulent documents or imposter detections made by TLS and VFS as this is not recorded centrally.” Without this data, it was unclear how the Home Office was measuring performance and assuring adherence to these contractual requirements.

Quality assurance – SSCs

- 10.10** Formal first-line assurance is completed by local SSC staff at Executive Officer or Higher Executive Officer grades on 5% of front-end and decision-making processes, and internal second-line assurance is completed by the Family and Human Rights (FHR) Quality Assurance team. In addition to this, further second-line assurance is completed by the Assurance,

Compliance & Improvement (ACI) Central Operations team, and results from all second-line assurance are formally fed back to SSC staff via an SSC manager.

- 10.11** In November 2019, the UKVI Improvement team undertook a review of SSCs to identify operational and service improvements. The report was delivered to SSC managers in February 2020 and highlighted issues around data anomalies, order of duties, performance data/dashboards and process instructions. UKVI told inspectors that its response to the review, and its recommendations within it, was “overtaken” by its response to COVID-19.

Quality assurance – Assisted Digital (AD)

- 10.12** Weekly assurance and monthly reporting are completed internally by the supplier of AD services, ‘We Are Digital’ (WAD), and in addition to this, the Home Office conducts internal monitoring by listening to calls to ensure procedures are adhered to where a customer has been transferred from the Home Office’s Settlement Resolution Centre. The Home Office told inspectors it monitors the performance of WAD monthly, in line with contractual requirements.

Feedback from CPs to UKVI

- 10.13** UKVI told inspectors that CPs fed back to UKVI on an ad hoc basis, through regular boards and meetings, and through a number of additional mechanisms. In terms of customer feedback, VFS provides a weekly customer experience dashboard to UKVI, which combines feedback from social media and VFS sources such as their own call centre, technical support, and the ‘Voice of the Customer’ survey. TLS also produces and shares a monthly dashboard with UKVI, consisting of a high-level monthly overview of performance in relation to KPIs and customer satisfaction results. Meanwhile, SSL were providing performance data and insight information to UKVI derived from ‘happy or not’ terminals, an approach that was inconsistent with that of TLS and VFS. At the start of 2020, discussions had taken place between UKVI and SSL in relation to the development of a dashboard and an enhanced collection and use of customer insight, however this work had been paused in Spring 2020 due to COVID-19 restrictions.

Complaints

The Home Office complaints process

- 10.14** Customers can make a complaint about the service they have received from UKVI by filling in an online complaint form on GOV.UK.⁵⁵ These complaints are handled by the Home Office Complaints team within Strategy Transformation and Performance. The Home Office has a 20 working day service level agreement (SLA) to respond to complainants, and complaints are split into either ‘service’ or ‘misconduct’ (‘minor’ or ‘gross’) categories.
- 10.15** Figure 3 shows performance data on the number of ‘service’ and ‘minor misconduct’ complaints that were made to the Home Office in relation to SSL, TLS and VFS between April 2019 and March 2020, and April and September 2020, along with the numbers that were responded to outside of the SLA, indicating a general adherence to the SLA overall.

⁵⁵ <https://www.gov.uk/government/organisations/uk-visas-and-immigration/about/complaints-procedure>

CP complaints process – NGOV

- 10.20** In line with the SLA introduced on 1 March 2020, both VFS and TLS have 10 working days to respond to a complaint. These can be sent by customers directly to the CPs or via UKVI. Between March and September 2020, VFS received a total of 2,363 complaints as defined in CSL8, of which 2,193 were substantiated and 170 were non-substantiated; there were only 2 occasions on which the 10-day SLA was not met. In the same period, TLS received a total of 14,323 complaints as defined in CSL8, of which 327 were substantiated complaints requiring follow-ups. UKVI reported: “TLS have met the SLA for 100% of complaints since March 2020.”
- 10.21** However, despite the adherence to response-time SLAs, submissions to the inspection’s CfE from customers and stakeholders indicated dissatisfaction with the complaints process. The customer service of one Front End Services (FES) provider in relation to complaints was described as “poor” and “appalling”, with the respondent citing a lack of accountability and response for the issues raised. A failure of FES providers to engage with complaints was also raised by a legal representative based overseas, and a lack of responsiveness to complaints was raised as a concern by diplomatic staff overseas. A legal stakeholder raised concerns about a lack of overall accountability by the Home Office and CPs when handling complaints related to FES.

The analysis of complaints data to learn lessons and drive improvement

- 10.22** Inspectors were told that UKVI and SSL hold monthly meetings to discuss complaints in further detail and use these to inform lessons learned and identify areas for improvement. In 2020, UKVI held an internal complaints workshop with the UKVI Complaints team, the Supplier Relationships and Services (SRS) team, and representatives from SSL, VFS and TLS during which the top areas of complaints and improvements to the process were discussed. UKVI stated that improvements made as a result of this workshop included identifying and amending guidance that was incorrect and ensuring consistency between the different complaints processes implemented by CPs.
- 10.23** However, inspectors noted differences between CPs in their approach to complaints, including complaint response-time SLAs implemented by SSL and VFS/TLS, and there were also inconsistencies in the categorisation of complaints applied by the Home Office and its CPs. While SSL categorised the complaints it received directly into 15 categories, VFS used 66 categories, and TLS’s complaints data showed the use of between 8 and 14 categories. The titles of the categories used were also inconsistent. For example, while SSL and VFS had a category for website (technical) issues, this did not feature in TLS’s complaints Management Information (MI). Such discrepancies indicated a disconnect between CPs in the identification and analysis of trends from complaints, forming an inconsistent base for the Home Office and CPs to learn lessons collectively for FES.

10.24 Inspectors also noted a lack of standardisation and ambiguity of certain complaints categories used by CPs. For example, VFS data indicated the use of multiple website-related categories such as ‘website technical issues’, ‘unable to load documents’, and ‘website’, and the use of other categorisation such as ‘random complaint’. Furthermore, TLS’s complaints data for September 2020 listed ‘About my documents’ as the second largest category for complaints (forming 24% of the complaints received), however what this specifically referred to was unclear. As a result, it was not possible to make any meaningful comparisons of CP performance and much harder to draw any general lessons from the complaints data.

11. Inspection findings: Vulnerable customers

Support for vulnerable customers in the UK

- 11.1** In April 2019, the ICIBI published an inspection of the Home Office’s Borders, Immigration and Citizenship Systems’ (BICS) policies and practices relating to charging and fees, which noted that customers would no longer be able to provide their biometrics at Post Offices and instead would need to travel to a reduced network of service points, potentially creating challenges for those with restricted mobility. To this end, the report recommended that:

“the Home Office should complete a full Post Implementation Review of the Front End Services Programme to report no later than the end of 2019, to include consideration of the impact on vulnerable applicants.”

- 11.2** The Home Office accepted this recommendation, committing to complete a full post-implementation review by the end of 2019, and stated its intention to take a broader view of how it was impacting vulnerable people across all Front End Services (FES) arrangements in the UK. On 7 March 2021, inspectors were told that the review “had not been completed due to the impact of COVID-19 on all UKVI [UK Visas and Immigration] services”.

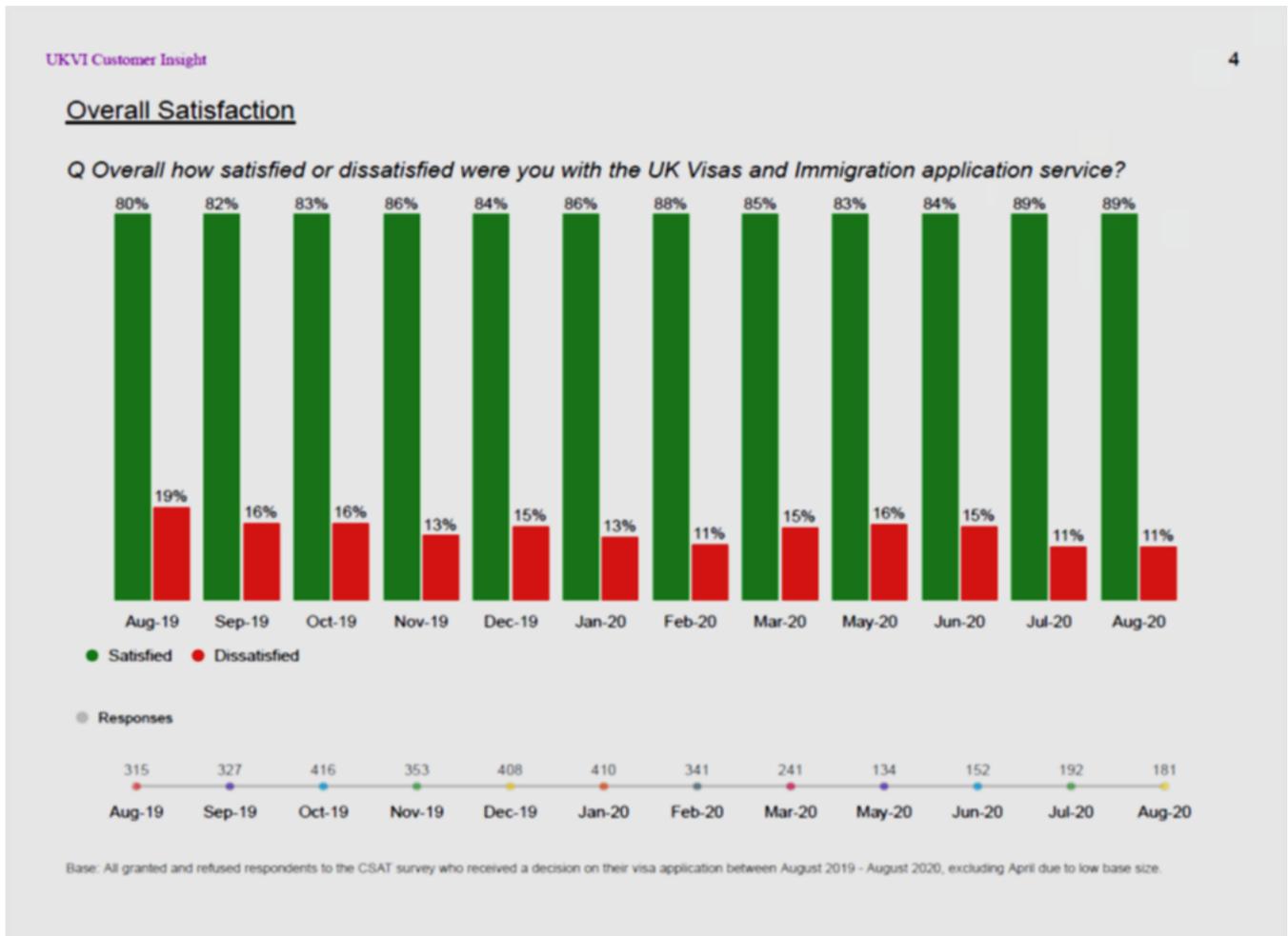
Service and Support Centres (SSCs)

- 11.3** Within its response to the report’s recommendation, the Home Office had also specified its plan to open UKVI-staffed SSCs, stating that these would:

“offer a human touch, guiding these individuals: who may have higher needs, to be in a position of vulnerability or whose circumstances may be complex through our application process.”

- 11.4** Inspectors noted that SSCs had opened in 7 locations in the UK by 25 March 2019: Belfast, Cardiff, Croydon, Glasgow, Liverpool, Sheffield and Solihull, offering free appointments.
- 11.5** Responses to the call for evidence (CfE) on SSCs were generally positive in terms of the accessibility of the service. UKVI stated that appointments were available across all routes consistently within the 5-day service level agreement (SLA), and in those locations where wait times exceeded the 5-day SLA, SSCs were able “quickly” to return them to within the SLA. Data on appointment availability at SSCs from September 2019 supported this.

11.6 Furthermore, the ‘Service and Support Centre Satisfaction Report’ from August 2019 to August 2020 produced by the UKVI Customer Insight team, showed that over the 12 months between 80% to 89% of respondents who had attended an SSC indicated overall satisfaction with the service – see Figure 4.



11.7 Customers indicated in their responses to the CfE that enhancing the geographical footprint of SSC service points would be beneficial in improving accessibility. UKVI’s ‘Service and Support Centre Satisfaction Report January 2020 – March 2020’ showed that 23% of customers who responded to its survey felt that they were unable to access an SSC at a convenient location. Inspectors were told by a senior manager in UKVI that the coverage was “broadly ok” but not as much as desired, and that customers would benefit from being given more of a choice. Another manager acknowledged this, stating that UKVI was intending to improve geographic coverage through pop-up centres.

Travel assistance

11.8 Customers who have been granted a fee waiver and meet an eligibility criteria also have the option to apply for travel assistance to attend their closest SSC.⁵⁷ Inspectors were, however, unable to obtain data on the number of applications submitted and whether these were granted or refused, with UKVI stating: “As there is no formal application process for travel assistance, the requested information is not recorded.”

⁵⁷ The criteria are: they have been granted a fee waiver along with the following – • in receipt of asylum support or Local Authority support • Domestic Violence customers • a responsible adult attending an appointment with a child in social care • anyone where paying for travel would render them destitute • where travel is over 3 miles.

Mobile biometric enrolment and ‘pop-up’ locations

11.9 In line with the UK Visa and Citizenship Application Service (UKVCAS) objective of “enhanced support for vulnerable customers through a range of financial support for travel costs and mobile services”, vulnerable customers who meet the eligibility criteria and are unable to attend an SSC appointment in person, due to physical health conditions or journey difficulties, also have the option to request a mobile biometric visit. The eligibility of requests is considered by the Service and Support Centre Appointment Line (SSAL) or by casework teams. Between April 2019 and March 2020, 251 visits were completed, and 22 requests were deemed ineligible. Mobile services were suspended on 25 March 2020 due to the impact of COVID-19 but were recommenced from November 2020.

11.10 The Home Office provided a list of eligibility criteria:

- Cancer depending upon the stage of the illness, severity, prognoses, treatment plan and mobility
- Residing and undergoing medical treatment in hospital for a number of weeks (and where it is unclear when the applicant will be released)
- Stroke depending on severity and prognoses and mobility
- Mental Health problems residing at home or under hospital care
- Brain function decline, including dementia and Alzheimer depending on stage of illness, severity and mobility
- Bedridden
- Frailty depending on severity, arthritis, Parkinson or other illness that severely reduce mobility
- Chronic conditions, such as liver, kidney disease that reduce mobility
- Physical impairments that severely reduce mobility, such as muscular dystrophy, cerebral palsy
- Pregnancy related conditions depending on severity, prognoses and impact on mobility
- Tetraplegic depending on evidence provided of inability to travel

11.11 A Senior Civil Servant described limitations with biometric enrolment services in terms of the need to “store people up to make it efficient”, especially if a customer was based in a remote location. Instead, the focus was upon exploring temporary ‘pop-up’ locations in collaboration with HM Passport Office and the Department for Work and Pensions’ use of their premises. Inspectors were informed about a ‘pop-up’ SSC in Durham in 2020, aimed to assist vulnerable customers in the northeast geographical area who may otherwise have lengthy journeys to Liverpool or Sheffield SSCs, which reportedly had reduced travel times for some customers by more than 3 hours.

Support for vulnerable customers overseas

- 11.12** Submissions from service-users asserted that UKVI was not providing sufficient support for vulnerable applicants overseas, including those with mobility restrictions who were unable to travel to a Visa Application Centre (VAC). A concerned diplomatic staff member felt that the needs of vulnerable customers were not being met when booking and attending appointments.
- 11.13** Inspectors observed that while SSCs were available in the UK to assist those with “higher needs”, there was no equivalent structure, or associated travel assistance, to support vulnerable customers applying from overseas. A Senior Civil Servant felt that there “could be some benefit” to implementing an equivalent support structure overseas, although whether it would bring any value to vulnerable customers was uncertain, and another felt that the notion would be worth considering on a location-basis rather than as a generic offering.
- 11.14** While an ‘On Demand Mobile Visa’ (ODMV) service served as an overseas equivalent to mobile biometric enrolment services in the UK, inspectors were told that the overseas service-providers VFS Global (VFS) and TLScontact (TLS) could refuse requests if the location was deemed unsuitable. When requests are received for the ODMV service, VFS and TLS complete a Customer Profile Template (CPT) and risk assessment (RA) for each ODMV location. The RA is sent to internal teams, including Security and Operations, for approval. A check is then undertaken for any adverse advice on that location. Once this process has been approved, the customer is contacted, and the ODMV service provided. Requests are refused on some occasions due to health and safety of staff, if the prospective ODMV location is not in a secure location or if it is logistically challenging for staff to travel to.
- 11.15** A stakeholder raised concerns that vulnerable customers who were unable to access a VAC due to logistical challenges were refused the service on the basis of their location, with no other alternative. Customers were also not aware of what the actual protocol was with regard to ODMVs and what criteria was being used by commercial partners (CPs). Furthermore, inspectors found that the VAC managers and senior managers interviewed during the inspection lacked awareness of the ODMV service in relation to vulnerable customers (this was only considered as a paid-for service).

12. Inspection findings: Public Sector Equality Duty (PSED) and Equality Impact Assessment (EIA)

12.1 The Equality Act 2010 introduced the (PSED. An entry on Horizon, the Home Office intranet, explains the PSED in the following terms:

“[The PSED] requires all Home Office employees and ministers to consider the impact that their decisions may have on people who have protected characteristics. The protected characteristics for the purposes of the PSED are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

“The duty is important as it means we must consider the real-world impact of our decisions whilst making policy or operational changes.”

12.2 Inspectors were told that:

“The Home Office Executive Management Board has made it a mandatory requirement for officials to complete an Equality Impact Assessment for all policy decisions and development, and that is the way in which we demonstrate that we have had due regard to the PSED.”⁵⁸

12.3 Inspectors therefore asked the Home Office for:

- a copy of the EIA undertaken by UK Visas and Immigration (UKVI) in relation to the introduction of the new digitised services in the UK Visas and Citizenship Application Service (UKVCAS) in November 2018
- a copy of the EIA undertaken regarding the introduction of the Home Office-staffed Service and Support Centres (SSCs) in 2018

12.4 In response, the Home Office provided a Policy Equality Statement (PES)⁵⁹ which was completed for the introduction of the UKVCAS digitised services but was not dated and had no review date. It included the general comment:

“As part of our Policy development for FES [Front End Services], and in order to ensure that we can demonstrate that we have had due regard to our public sector equality duty imposed by the Equality Act 2010, a number of activities and consultations (set out below), have been carried out and some more are scheduled to take place in the future, giving full consideration to the protected characteristics of our customers and staff.”

⁵⁸ <https://horizon.homeoffice.gov.uk/file/467823/download/eia-guidance.doc>, pg4.

⁵⁹ PES were used prior to 2019 and since then the Home Office has reverted to calling these statements EIAs.

- 12.5** There was no evidence of any further scheduled activities beyond those listed as having taken place or of any review of the PES being undertaken. The Home Office told inspectors that:
- “UKVCAS PES recommended that a review was completed 6 months after the implementation of the UKVCAS service. This review was not completed however UKVI continually measures how SSL, TLS and VFS, meet their equality duties. Nonetheless, we will complete a full review of this PES to ensure this document remains up to date and will ensure that equality compliance is a regular agenda item on commercial partner performance meetings going forward.”
- 12.6** With the new digitised service having been launched in November 2018 and assuming that a review should have taken place in June 2019 (after 6 months), the review is already long overdue.
- 12.7** Having examined the UKVCAS PES and taken account of the responses to ICIBI’s call for evidence (CfE), inspectors concluded that, notwithstanding some brief comments on religion and disability, the PES did not give sufficient consideration to the potential impact of the new services on people with protected characteristics as identified in the Equality Act 2010.
- 12.8** According to stakeholders, the Home Office’s failure to consider such characteristics sufficiently in the PES has since been compounded by its failure to respond effectively to the experiences of vulnerable applicants seeking to make use of UKVCAS. For example, one stakeholder commented:
- “people we support are unable to use UKVCAS without third party support. The process of applying is not easy nor is it immediately clear which steps the applicant should take in order to proceed through the application [...] the implications of not making services accessible are extensive and can for example lead to people losing their entitlement to stay legally in the UK when they are unable to book an appointment at UKVCAS, submit documentation or biometrics within strict deadlines.”
- 12.9** Inspectors also examined the SSC PES. Here, the process of articulating how the ‘due regard’ duty will be met and recognising the direct and indirect consequences of the proposed changes on people who share protected characteristics appeared to have been better thought through. All the protected characteristics are referenced, with data supporting mitigating actions and gaps identified and how these will be addressed.
- 12.10** As with the UKVCAS PES, the SSC PES referred to a review “6 months after ‘go-live’ of the project, in April 2019, in order to reflect on the service offered to date, and to incorporate additional MI [Management Information] gathered on customers during this period. Following any alterations to the provision of services offered by SSCs made as a result of this review, a further review will then take place in October 2019, following which reviews of this PES will take place on an annual basis, unless needs dictate an immediate adjustment.” However, the Home Office provided no evidence that any reviews had been completed.
- 12.11** The Home Office also provided the PES for Sitel. On examination, inspectors found that the template was missing key information. In the section which states that “[t]o assist in evaluating whether there is robust evidence that could withstand legal challenge, the following questions must be asked prior to sign-off”, 2 key questions were left blank: “Have the relevant stakeholders been involved and/or consulted?” and “Has all the relevant quantitative and qualitative data been considered and been subjected to appropriate analysis?”

- 12.12** The Sitel PES was dated 31 May 2017 and had a review date of 1 December 2017. Again, inspectors were not presented with any evidence that any reviews had been completed.
- 12.13** In 2020, the Equality and Human Rights Commission (EHRC) undertook an assessment of the Home Office’s compliance with the PSED in implementing the Hostile Environment provisions in the Immigration Act 2016. The EHRC found that the department had failed to comply with the PSED when developing, implementing and monitoring these measures. The EHRC made recommendations for how the Home Office should use the PSED as an essential safeguard against the experiences of the Windrush generation ever being repeated.
- 12.14** The recommendations were published in full in November 2020,⁶⁰ and this was followed up in April 2021 by a legal agreement, under section 23 of the Equality Act 2006, committing the Home Office to a 2-year action plan based on the key findings from the EHRC’s assessment. The Home Office has committed to a range of actions to achieve these outcomes, such as the establishment of a Community Stakeholder and Engagement Hub and steps to strengthen the equality advice given to ministers.
- 12.15** Based on what inspectors found, there is more work to do within FES to ensure that EIAs are seen as ‘living documents’ as described by the EHRC, supporting the delivery of the PSED and being reviewed and updated on a regular basis. There is also the need to ensure consistency in how EIAs are completed and that they are adhering to the Home Office policy guidelines published in 2019. This will go some way to meeting the Home Office Comprehensive Improvement Plan.
- 12.16** A senior manager from one commercial partner (CP), when asked in April 2021 about Equality, Diversity and Inclusion and what has been done to date, stated: “UKVI and us can do better.” The feedback that inspectors received from Home Office commercial staff who work with TLScontact (TLS) and VFS Global (VFS) with regard to EIA, indicated an absence of, or very limited, knowledge among the CP staff of what was required.
- 12.17** The Home Office needs to re-examine its obligations with regard to the PSED and ensure that it is consistent in how it delivers these responsibilities through a clear plan developed in conjunction with the Home Office’s PSED team.⁶¹

60 https://www.equalityhumanrights.com/en/our-work/news/home-office-signs-legal-agreement-improve-practices-following-windrush?utm_source=e

61 PSED@homeoffice.gov.uk

Annex A: Home Office letter of explanation



UK Visas
& Immigration



HM Passport
Office

Director General's Office,
UK Visas and Immigration and Her Majesty's
Passport Office
2 Marsham Street,
London, SW1P 4DF

David Bolt
Independent Chief Inspector of Borders and
Immigration
5th Floor Globe House
89 Eccleston Square
London, SW1V 1PN

[REDACTED]

15 December 2020

Dear David,

I hope you are well and are counting down the days to your next adventure?

On our last call we discussed the ICIBI's inspection into UKVI's Front End Services (FES). I said there was some nervousness in the team about the commercially sensitive nature of the some of the evidence.

The Department is committed to ensuring the ICIBI has access to documents when requested and any possible interference in exercising of your statutory functions under section 48 of the UK Borders Act 2007 (to monitor and report on the efficiency and effectiveness of the immigration, asylum, nationality and customs functions carried out by the Secretary of State and by officials and others on her behalf) is avoided as far as possible.

In the requests below, it is the potential for onward publication that is the issue for the Home Office and our suppliers, and we would routinely make a case for commercial sensitivity given the potential impacts on our suppliers within their own competitive markets. Therefore, in order for these responses to be shared in full, we request confirmation in writing that no commercially sensitive information relating to our suppliers will be disclosed publicly and request the opportunity to review and redact any commercially sensitive information within the draft report whilst we are conducting the factual accuracy review.

We have listed the preliminary evidence requests where the responses would contain commercially sensitive information below:

- **Request 13** – Following discussions with TLS, VFS, SSL and Sitel, information on the income generated by each commercial partner will need to be withheld from public disclosure.
- **Request 14** - Following discussions with TLS, VFS and SSL, information on the monthly income generated by mobile appointments will need to be withheld from public disclosure.

- **Request 15** - Information on the monthly generated income is commercially sensitive and should be withheld from public disclosure as it could be used to calculate the revenue and cost of operation by service line of the supplier which could undermine the supplier's commercial cost competitiveness with their peers in this market place.
- **Request 19** - Following discussions with TLS, VFS, SSL and Sitel commercially sensitive information would need to be withheld from public disclosure, particularly information around financial elements, new service innovations or matters of performance against key performance indicators (KPIs) and customer insight.
- **Request 23** - Following discussions with TLS, VFS, SSL and SITEL, commercially sensitive information on the respective supplier's performance against contractual KPIs will need to be withheld from public disclosure, particularly information concerning financial elements, which if published are likely to be prejudicial to the supplier.
- **Request 27** - We have discussed with TLS, VFS, SSL and SITEL and whilst we can provide information on the performance issues and reasons for penalties, details of the total financial amount of service credits imposed on our commercial partners will need to be publicly withheld.

In addition, details of KPIs applied by the Home Office to assess the performance of commercial partners and other contractual information which is not already public, is commercially sensitive and would need to be withheld from public disclosure.

Once confirmation has been received, we will arrange for these responses to be collated and submitted to your Inspectorate in full as a matter of priority.

Yours sincerely,



Abi Tierney
Director General, HM Passport Office and UK Visas & Immigration

Annex B: ICIBI letter

Abi Tierney
Director General
UK Visas and Immigration
2 Marsham Street
London



Date: 17 December 2020

Dear Abi,

Thank you for your letter of 15 December 2020 setting out the Home Office's position in relation to those items within my evidence request deemed by the department and your supplier of Front-End Services to be commercially sensitive.

I appreciate that your suggested solution is intended to be helpful. However, I am not able to agree to the pre-conditions in your letter. As I have explained, most recently in my letter to the PUS dated 30 November 2020, I believe it is wrong both in law and in principle for the department to withhold information from the Independent Chief Inspector, and for me to accept this and agree in advance not to refer to certain information in my report would fatally compromise my independence. I have no wish to argue about the specifics in this case, but I find the refusal to provide performance data particularly egregious.

I previously agreed with Shona that where the department refused to provide information I had requested I would publish her letter of explanation in my inspection report. It will fall to my successor to complete the FES inspection report, but I will advise them that your letter and this response should be included.

Yours sincerely

David Bolt
Independent Chief Inspector of Borders and Immigration

Annex C: Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on her behalf.

The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions. However, functions exercised at removal centres, short-term holding facilities and under escort arrangements are excepted insofar as these are subject to inspection by Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectors of Constabulary (and equivalents in Scotland and Northern Ireland).

The legislation directs the Independent Chief Inspector to consider and make recommendations about, in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on section 19D of the Race Relations Act 1976 (c. 74) (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to him in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which he has committed to do within 8 weeks of receipt, subject to both Houses of Parliament being in session.

Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

Annex D: ICIBI's expectations

Background and explanatory documents are easy to understand and use

(e.g. Statements of Intent (both ministerial and managerial), Impact Assessments, Legislation, Policies, Guidance, Instructions, Strategies, Business Plans, intranet and GOV.UK pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate).
- They are kept up to date.
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible).

Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors.
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined.
- The potential for blockages and delays is designed out, wherever possible.
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets).

Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers.
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance.
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully.
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences.
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences.

Decisions and actions are ‘right first time’

- They are demonstrably evidence-based or, where appropriate, intelligence-led.
- They are made in accordance with relevant legislation and guidance.
- They are reasonable (in light of the available evidence) and consistent.
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements).

Errors are identified, acknowledged and promptly ‘put right’

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective.
- Complaints are handled efficiently, effectively and consistently.
- Lessons are learned and shared, including from administrative reviews and litigation.
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits.

Each immigration, asylum, nationality or customs function has a Home Office (BICS) ‘owner’

- The BICS ‘owner’ is accountable for:
 - implementation of relevant policies and processes
 - performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
 - resourcing (including workforce planning and capability development, including knowledge and information management)
 - managing risks (including maintaining a Risk Register)
 - communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
 - effective monitoring and management of relevant contracted out services
 - stakeholder engagement (including customers, applicants, claimants and their representatives)

Acknowledgements

The inspection team is grateful to the Home Office for its cooperation and assistance during the course of this inspection and for the contributions from the staff who participated. We are also grateful to the stakeholders who contributed.

Inspection Team

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