

# Office of the Immigration Services Commissioner:

Business Plan 2022/23

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#### 1. Introduction

The Office of the Immigration Services Commissioner (OISC) 2022/23 Business Plan sets out our priorities and how we will deliver our services for 2022/23. It supports the delivery of OISC three-year Corporate Plan (2020-23) which provides the strategic framework for this Business Plan.

#### 2. About the OISC

Led by the Immigration Services Commissioner, the Office of Immigration Services Commissioner (OISC) is an Arm's Length Body of the Home Office. Our statutory duties are set by the Immigration and Asylum Act 1999 and include regulating immigration advice and services across the UK. We are currently funded through a grant in aid budget of £3.82m, with 60 employees and based in London, regulating over 3,000 individual immigration advisers and 1,600 organisations. (Advice provided by solicitors and barristers falls outside of OISC's authority and is regulated by the Solicitors Regulation Authority and the Bar Standards Board).

We are responsible for making sure that everyone who is seeking immigration advice from OISC regulated advisers receives good and reliable advice and are protected from the risks and dangers of illegal advice or poor service. This is done by promoting good practice to immigration advisers, setting standards and making sure those standards are upheld. Specifically, it includes:

- assessing and registering those who want to be an immigration adviser
- auditing the performance of advisers ensuring standards are maintained
- managing and investigating complaints against immigration advisers
- identifying and taking enforcement action against those who provide poor service or immigration advice illegally
- overseeing those who regulate immigration advice by solicitors and barristers in Scotland and Northern Ireland where the legal systems are different

#### 3. Our vision

Our Corporate Plan 2020 – 2023 sets out the OISC's vision that every person seeking immigration advice within the UK

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

To achieve this, it is our mission to be an enabling regulator, connecting the advice seeker with reliable advice.

#### 4. Our strategic objectives

Our Corporate Plan 2020-2023 sets out six strategic objectives that provide the framework for how we will achieve our mission. These are:

#### **Promote**

Ensure advice seekers and those around them know how and why to access advice from a regulated adviser

#### Collaborate

Collaborate with others to create a system that is transparent and easy to understand

#### Regulate

Create a world class advisory system where good practice is the norm for all OISC regulated immigration advisers.

#### **Protect**

Protect advice seekers, taking action against poor advice, exploitation and criminal activities

#### Develop

Reform the OISC into a modern and engaging organisation, geared to meet the needs of advice seekers in the 2020s

#### **Enable**

## 5. OISC 2022/23 business plan priorities

The following pages set out the OISC's priority outcomes and objectives for 2022/23 which support the delivery of the strategic objectives.

Throughout 2022/23 we will hold ourselves to account and monitor our progress against these objectives and measures.

## Objective 1: Promote

We will ensure advice seekers and those around them know how and why to access advice from a regulated adviser

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
Promote	Advice seekers, the public and key stakeholders have a greater awareness of	Develop and implement an OISC social media strategy that increases audience reach, using effective and accessible digital communication channels.	Develop a social media reporting methodology with associated metrics for follower growth, impressions, reach, traffic, and quality of sessions by September 2022  50% increase in the number of followers on the OISC Facebook page and 50% on the OISC twitter page	Public have a raised awareness about how immigration advice services will benefit all those seeking advice, their families and employers.
	the OISC, its purpose and regulatory impact		10% increase in the number of followers on the OISC LinkedIn page  New brand implemented and 100% of all internal and external communication reflects the new corporate identity	Public have a raised awareness about the role of the OISC which in turn will increase public confidence in the immigration system as a whole.
		Establish a recognisable corporate identity that accurately reflects the OISC's vision, mission, and values.	100% of regulated advisers will be issued with a digital badge with the new corporate identity by April 2023	

## Objective 1: Promote

We will ensure advice seekers and those around them know how and why to access advice from a regulated adviser

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
Promote	OISC engages effectively with its stakeholders and partners.	At a national and regional level, develop and significantly increase engagement activities with all priority key stakeholders.  Embed a new Customer Services Unit that is easily accessible, signposts enquirers to the right departments and facilitates the speedy response to enquiries raised	Develop an engagement strategy with associated reporting methodology, with a baseline for future measurement by October 2022. Metrics to include advice deserts, the levels and nature of illegal immigration advisory activities within each region and the needs of applicant and regulated organisations to support them to develop and grow.  Number of community engagement activities per region with advice seekers, advisers, other stakeholders, and the public (baseline for future measurement to be established)  80% of adviser respondents will state they have confidence in the OISC's vision, mission and objectives.  90% of enquiries will be responded to within 5 working days as evidenced through sampling.  Bi-monthly reports highlighting individual enquiry trends and actions taken as a result, to be in place from June 2022  80% of customer service users will state in surveys they are either satisfied or very satisfied with their interactions with the Customer Service unit.	Stakeholders will perceive the OISC to be an outward looking, proactive organisation that works in partnership with others.  OISC ways of working will significantly change to become more outward looking and proactive, working in partnership with others.

Priority	Outcome	Objectives	Outputs / Measures	Benefits
Inform	Advice seekers and members of the public know	Increase awareness of the importance of using a registered immigration adviser amongst migrant communities.	Tailored campaigns as circumstances dictate.	Advice seekers are better informed about how to access high quality advice.
	to go to the OISC to find an immigration adviser and complain about	Increase awareness of the OISC's adviser finder and adviser register.  Increase awareness amongst advice	20% increase in website traffic to the Adviser Finder and Adviser Register on the OISC site	Advice seekers are better protected from illegal activities reducing chances of victimisation and abuse.
	poor or illegal immigration advice	seekers of how to complain about poor or illegal immigration advice for both regulated and unregulated advisers.	20% increase in website traffic to complaints pages on the OISC site	Public have a raised awareness about how immigration advice services will benefit all
		Develop the OISC internet to ensure content is easily accessible, easy to	Feedback from advice seekers and representational groups on the utility of the	those seeking advice, their families and employers.
		understand and tailored to meet stakeholder needs	adviser finder.	Public have a raised awareness about the role of the OISC which in turn will increase public confidence in the immigration system as a
	Advisers experience the OISC internet as a useful source of information.	Information available on the OISC website is easily accessible, up to date and presented in a user-friendly manner.	80% of advisers through surveys will state they are either satisfied or very satisfied with the information on the OISC internet	whole.

## Objective 2: Collaborate

We will collaborate with others to create a system that is transparent and easy for the advice seeker to understand and navigate.

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
Collaborate	OISC actively works jointly with its partners.	Develop joint working initiatives at a national and regional level in support of the OISC vision.	Number of joint working initiatives delivering a shared aim per region.	Stakeholders will perceive the OISC to be an outward looking, proactive organisation that works in partnership with others.

## Objective 3: Regulate

We will create a world class regulatory system where good practice is the norm for all OISC regulated advisers

Priority area	Outcome	Objectives	Outputs / measures	Benefits
Regulation	Applicant organisations and their advisers will be 'registration ready' at the time of their application.	Introduce a culture of encouragement with support at the application and development stages.	Increase engagement activities for applicant and regulated organisations related to innovation and development (establishing a baseline for future measurement)  Increase in number of OISC registered advisers/organisations	Advice seekers have access to larger number of regulated advisers who can meet their needs
	Advice seekers will be able to access a trusted immigration adviser who can provide quality advice to meet their individual needs.	Applications for registration show an increase in quality and a corresponding increase in successful registration.  Processing of applications to fall within agreed time and quality standards, to ensure those with the right skills and knowledge are not delayed from working and are available to advice seekers.  Develop streamlined application processes as part of Themis replacement.	100% of approved applications have met all the quality assurance standards.  80% of all completed Level 1 applications for individual adviser and organisation applications completed within 4 months.  90% of all completed applications for individual adviser and organisation applications completed within 6 months.  95% of all completed 'straightforward' continued registration applications completed within 15 working days.  95% of all continued registration applications are decided within 3 months of receipt.	Advice seekers have increased confidence in regulated advisers

Objective 3: Regulate

We will create a world class regulatory system where good practice is the norm for all OISC regulated advisers

Priority area	Outcome	Objectives	Outputs / measures	Benefits
Regulate	Advice seekers and the sector will recognise OISC advisers as professionals delivering valued specialised immigration advice and services.	Advice seekers will be able to access a comprehensive OISC register, regularly updated with correct and useful information about advisers.	100% of quarterly quality assurance checks, confirm Adviser details and levels are correct on the case management system and OISC website.  Implementation of digital badges for regulated organisation confirming OISC registration details by April 2023.	Adviser seekers are better informed and confident to select the right adviser to meet their needs.
Compliance	Registered organisations will take responsibility for demonstrating their compliance, within set standards, including regulated selfassurance and earned recognition	Those we regulate are fit and competent, complying with the Commissioner's Codes of Standards.  Audit OISC registered organisations who are most at risk of non-compliance and ensure timely feedback.	<ul> <li>100% high-risk organisations are scheduled for audit within the business year or 12 months of the risk being identified.</li> <li>85% of Identified Issues Reports are dispatched within 10 working days of the audit completion date.</li> <li>90% are dispatched within 20 working days of the audit completion date.</li> <li>100% of decisions to cancel or refuse registration are issued within 20 working days of the conclusion on fitness or competence being made.</li> </ul>	Regulated organisations are empowered to provide services that meet the OISC standards with action taken promptly against those not meeting the standards

based regula of working, b	completion of external consultation in relation to the introduction of principle has a display to the consultation.	
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Priority area	Outcome	Objectives	Outputs / measures	Benefits
Complaints	Advice seekers will have access to an effective complaints and dispute resolution system regarding regulated immigration advisers.	Investigate and respond to complaints against advisers in a timely proportionate manner.	Feedback from complaints surveys indicates that 80% of respondent complainants found their complaints were considered in a timely, fair and proportionate manner.  85% of complaints are resolved or determined within five months of the complaint being received.  100% of complaint determinations reviewed through quarterly quality assurance checks, indicate that the investigation conducted was appropriate and outcomes reasonable.	Advice seekers will benefit from access to a streamlined complaints process.
		Keep complainants informed throughout complaints process and ensure they are aware of decisions and resulting actions.	100% of complainants are informed of the progress of their complaint every six weeks.	

## Objective 4: Protect

We will protect advice seekers, taking action against poor advice, exploitation and criminal activities

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
Investigations & complaints	Illegal immigration advice is disrupted or stopped by appropriate	Use a range of enforcement activities with appropriate proportionate response, including prosecutions against those operating unlawfully.	Deliver a 25% increase in the number of enforcement outcomes including prosecutions, Simple Cautions, Formal Warnings, Restitution, Notice of Investigations, compliance.	Public are better protected from illegal activities reducing chances of victimisation and abuse.  Public have a raised
	enforcement action including prosecution	Increase awareness amongst advice seekers of organisations/individuals who are operating unlawfully.  Develop a basic understanding of the levels and nature of illegal immigration advisory activities within each region.  Through regional team activities promote the dangers of illegal	100% of organisations/individuals under investigation and where the evidential tests as set out in the Criminal Enforcement Policy are met, are published online and to all relevant stakeholders.  Establish a baseline understanding of criminal activity within regions.  An increase of 25% in complaints received regarding unlawful activity.	awareness about the role of the OISC which in turn will increase public confidence in the immigration system as a whole.  Key stakeholders are aware that the OISC proactively tackles illegal practice and is reforming regulatory functions to increase the integrity of the OISC.  The Immigration system's
		advice, increase the number of complaints of illegal activities.		integrity is protected through proactively tackling illegal practice.

Objective 4: **Protect**We will protect advice seekers, taking action against poor advice, exploitation and criminal activities

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
	Enforcement action is taken against a greater number of individuals and organisations operating illegally.	Within each region and nationally, establish working partnerships with other enforcement and relevant agencies to improve the extent and quality of intelligence received.	25% Increase in number of referrals either leading to an investigation or forwarded to another agency to progress (2021/22 baseline).	Greater sharing of information with other enforcement agencies.
Intelligence	A comprehensive intelligence picture	To research and analyse future and emerging threats with recommendations for action and mitigation.	Bi-monthly report to Senior Leadership Team with outputs, linked with engagement reports.	
	The investigation of criminal investigations is carried out in a timely manner.	Improve time taken to develop intelligence to support regulatory and investigative activities.  Greater efficiency of a criminal investigation ensuring the most appropriate case outcome.	75% of intelligence will be actioned within 4 weeks and 95% actioned within 8 weeks.  70% of criminal investigations will be resolved within 6 months.  90% of criminal investigations will be resolved within 12 months.	

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
People	Business plan outcomes are achieved through an effective performance management system	All OISC staff adhere to the existing performance appraisal policy and procedures.	100% of staff have Key Work Objectives agreed by the end of April.  100% of staff complete their full year performance appraisal by the end of April.	Employees experience a more varied jobs moving away from silos of the past.
			100% of staff complete their half year performance appraisal by the end of October.	
	A new performance management framework aligned with the vision and	Develop a performance management system for implementation from April 2023	Performance Management system developed by end of Q3.	
	values.		100% of Line managers will be trained in implementing the new appraisal policy and procedure to ensure consistency across the business by the end of Q4.	
			100% of staff will be trained in the new appraisal policy and procedure and understand what is expected of them to achieve their objectives by the end of Q4.	

Priority area	Outcome	Objectives	Outputs / Measures
	All staff will be aware of the values and associated behaviours and feel a greater sense of motivation and engagement.	Implement a new set of values to underpin OISC staff actions and behaviours, creating a new culture that makes the OISC an exciting, modern, and engaging organisation to work for.	Build into new performance management system, a means of assessing how staff demonstrate OISC values.  90% of staff survey results demonstrate staff know what the OISC values and associated behaviours are.
	Improved staff wellbeing.	Implement an engagement framework which supports wellbeing with all staff working from home.	90% of staff survey results demonstrate that staff feel the OISC supports their wellbeing.  The average sickness days within the OISC do not exceed the public sector average of 7.9.
	Reduced pay inequity across the organisation.	OISC will operate within the new salary framework	100% of job roles identified for re- evaluation will be re-evaluated by the end of Q3.
	Staff are provided with policies that are flexible, agile, and robust to support remote working.	To implement a suite of key policies (Travel and subsistence policy; Annual leave policy, Pay and rewards policy; Working from home policy and Working hours	Staff surveys demonstrate 100% of staff understand the framework in which to operate and feel supported.

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
		policy) to support remote working with a regional presence.		
		To undertake a review of all key policies.	All policies reviewed by end of Q3.	
	Staff are equipped with the necessary training and skills to deliver the business plan objectives.  Staff explore their longterm aspirations and career goals.	To implement an approach to learning and development that enables staff to fulfil the business plan objectives and prepare for future roles within and outside of the OISC.	100% of staff have agreed on a personal development plan by end of April as part of agreeing key work objectives.	
Business management – finance	OISC manages its budget within allocated monies	Effective budget management and controls are strictly adhered to within allocated funds.	Budgets remain within allocated funds with any exceptions agreed with the Commissioner, as reported monthly.	Effective use of public money.
	Nil fraudulent activities occur within the OISC	Counter anti-fraud activities are identified and maintained across all OISC departments.	Number of potentially fraudulent activities identified and responded to.	

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
	OISC accounts meet the requirements of the auditors and sponsor department	Achieve unqualified accounts with no management override with financial statements which are accurate with no material misstatements.	NAO audit results of year end accounts.  Financial resources are spent (receipts and expenditures) and are compliant with Managing Public Money as set out in HM Treasury 2021 MPM guidance.	
	Establish a sustainable level of income to deliver the OISC vision for the next five years.	Develop a new funding model alongside development of a new fees and charging structure for immigration Advisers.	A developed funding model is agreed between the Home Office and OISC for implementation in 23/24.	
Business management – IT and data	Staff's ability to work is unaffected by progressing the IT development programme	Ensure employees have access to IT systems 99% of the time (excluding planned downtime).  Resolve reported IT issues in a satisfactory and timely manner in line with high, medium and low priority timescales.	99% uptime for IT system and hardware uptime 90% of staff surveys demonstrate improved IT systems reporting at national and regional level (after Themis replacement). 90% of IT issues are resolved in accordance with Service Level Agreements.	Staff will have modern up to date equipment and support to carry out their job responsibilities, which meets business and user needs

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
	ICT systems are fit for purpose to support a fully remote working organisation	New case management system implemented, replacing Themis database  All ICT infrastructure updated and moved into the cloud with appropriate 3 <sup>rd</sup> party maintenance and support.	individual workstreams  fit for purpose case management system meets business and needs  fit for purpose case management system meets business and needs  100% of incidents and near misses are reported within legal timescales.  7 or less notifiable incidents reported.  Report on number of low-level incidents and trend.  Report on number of low-level incidents and trend.	
	OISC data and information is secure from external and internal threats	Minimise breaches and data incident occurrences and their impact.  Encourage reporting of incidents from OISC staff through a culture of information security and data awareness.		
	Information security within the OISC is further strengthened to meet increased threats from external sources.	To have mitigating strategies specifically designed to counter known and emerging cyber security threats.	The number of security incidences arising from new emerging cyber security threats and how many are mitigated or negated through the strategies.	
Business management – Legal	OISC regulatory and enforcement decisions are	Provide timely legal advice to regional teams regarding regulatory and enforcement issues	80% of internal requests for legal advice on registered cases/issues are answered within 10 working days.	Improve quality of advice sector.

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
	proportionate and legally robust.	to ensure that decisions are proportionate and legally robust.  Successfully defend OISC regulatory decisions at Tribunals and courts as appropriate.	85% of decisions are upheld at Tribunals.	
	Staff have up to date knowledge of and are working to relevant legislation.	Provide advice on any changes to statutes or statutory instruments affecting regulatory and enforcement operations.	100% of legal developments, relevant to the OISC's regulatory scheme are disseminated to staff and implemented appropriately.	
	Individuals/organisations conducting illegal activities are prosecuted successfully.  Assurance of compliance of the overall regulatory scheme within Northern Ireland and Scotland	Prosecution of illegal activities is taken forward when in the public interest and appropriate.  To report to the Home Secretary, on the Designated Professional Bodies, regarding the regulation of their members to provide immigration advice.	85% of prosecutions lead to a conviction.  Reporting on Designated Professional Bodies in the Annual report.	

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
Strategy, business planning and risk	OISC delivers on its business plan objectives.	Monitor progress against 2022/23 Business Plan outcomes and objectives.	Quarterly performance review reports  Annual report	OISC activities tailored to meet Advice seekers needs where appropriate.
	OISC has a robust Governance structure.	Identify and manage corporate and operational risks in line with the OISC's risk management process.	Quarterly corporate risk reviews Annual report	
	GiAA Internal audit programme completed.	All internal audit recommendations are implemented within the timescales agreed with the auditors.	Nil outstanding internal audit recommendations against timescales reported at ARAC.	
	Compliance with UK Government functional standards.	Implementing an action plan that identifies priority areas.	Number of outstanding areas at each quarterly performance review.	
Business management – Internal communications	Staff have greater awareness of OISC activity and feel more connected to the organisation	Develop and deliver the existing internal communications and engagement plan to further embed two-way engagement.	90% of staff survey results confirm they are either satisfied or very satisfied with internal communication channels and confirm they receive timely information.  Issues arising out of SLT and Staff Voice/BEC interactions.	

Priority area	Outcome	Objectives	Outputs / Measures	Benefits
			90% attendance rates at staff conferences.	
	A fit for purpose intranet to meet staff requirements.  A fit for purpose website to better meets staff and stakeholder requirements.	Develop a reformed intranet platform that improves internal communications and ensures easy accessibility of key information, by Q4.  Work with Gov.uk to develop a website that better meets stakeholder requirements.	Progress is monitored through the Development Programme.  Progress is monitored through the Development Programme.	

## 6. Our development programme

Alongside our Business Plan activities, we will also continue to develop and deliver our Development Programme. The Development Programme will ensure the OISC is able to deliver its vision and Corporate Plan. It will reform the OISC into a modern and engaging organisation, geared to meet the needs of advice seekers in the 2020s.

In 2022/23 our Development Programme priorities are:

Outcome	Objectives	Outputs / Measures
The OISC becomes an outward looking and proactive organisation capable of delivering its vision and putting the advice seeker at the heart of its work.	To realise the Development Programme outcomes and benefits through a series of defined workstreams and projects.	Progress and benefits realisation is monitored by the Development Programme Board.

#### 7. Our resources

#### People

We employ 60 colleagues across the OISC. Our business plan activities include a number that focus on developing and investing in our staff, to ensure we have the right leadership, skills and values to deliver our 2022/23 Business Plan.

#### Finance

Our budget to deliver the Business Plan activities and transformation aims for 2022/23 is £3,820,000.

