



A short-notice inspection of decision-making quality in the Accra visa section

01 - 04 October 2012

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Independent Chief Inspector of Borders and Immigration

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Foreword from John Vine CBE QPM Independent Chief Inspector of Borders and Immigration



I am pleased to present the report of my third short-notice inspection overseas. The inspection focused on my statutory remit as the Independent Monitor for Entry Clearance Refusals without the Right of Appeal. I would like to thank the Agency for the positive way in which it responded to my inspection.

I chose to inspect the Accra visa section because its refusal rate for Other Visitor visas was one of the highest of all visa sections and, as a hub, it receives applications from a number of countries in West Africa.

I found the quality of decision-making was good overall, with proper use of the Immigration Rules. However, I found no evidence that appeal outcomes were being analysed to further improve decision-making quality. I found good retention of documents on case files, in line with recommendations I have made previously, and sound procedures for the protection of personal data.

Although performance at the time of my inspection was improving I noted that, as recently as August, there had been significant delays in processing applications. A particular issue that came to light was that in a significant number of the cases we sampled, where the visa application was submitted in Yaounde, the decision as to whether or not to issue a visa was made after the applicant's intended date of travel. This represented poor customer service to applicants in Cameroon.

I observed the operation of the hub and spoke system in West Africa and noted the logistical difficulties faced by the Agency. These pose challenges which the Agency needs to overcome if it is to provide applicants in spoke countries with the levels of customer service enjoyed by applicants in Accra.

A handwritten signature in black ink that reads 'John Vine' followed by a period.

John Vine CBE QPM

Independent Chief Inspector of Borders and Immigration

1. Executive Summary

- 1.1 This short-notice inspection examined the efficiency and effectiveness of the Accra visa section, with a particular focus on decision-making quality for visa refusals in Other Visitor cases attracting limited rights of appeal.
- 1.2 The quality of decision-making was assessed by an analysis of 50 Other Visitor refusal cases which were selected at random. This involved consideration of how Entry Clearance Officers had assessed and used evidence, presented by applicants, in order to determine whether decision-making was:
- efficient, effective and fair; and
 - in line with relevant Immigration Rules and UK Border Agency policy and guidance.
- 1.3 During the period covered by our file sample, the visa section in Accra was failing to meet its customer service standard to deal with 90% of applications within 15 working days, with only 21% of our sample meeting this standard.
- 1.4 A significant number of the cases that we sampled were decided after the applicant's proposed date of travel, even where the application was made at least 15 working days before this date. In all of these cases, the application had been submitted in Yaounde. This is both frustrating for applicants and potentially reputationally damaging for the Agency. Despite this, applicants in Cameroon were not advised that the Agency was having difficulty in meeting the 15 working day customer service standard.
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- A significant number of the cases that we sampled were decided after the applicant's proposed date of travel*
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- 1.5 We were pleased, however, to find that the quality of decision-making was high, with only two cases failing to meet all of our decision quality indicators. Analysis of the reasons provided by Immigration Judges in allowing or dismissing appeals against the decisions of Entry Clearance Officers can help to improve decision-making even in those cases where appeal rights are limited, as the same decision-making principles apply to these cases as to cases attracting full rights of appeal. We did not, however, find evidence that appeal outcomes were analysed in order to further improve decision-making.
- 1.6 We found that files were in good order and the retention of documents on files was in line with recommendations we have made in previous reports. However, the quality of refusal notices was variable, with some failing to address positive evidence provided by applicants and others containing errors concerning applicants' details.
-
- the quality of decision-making was high*
-
- 1.7 We found that ECM reviews were being conducted using a checklist template which complies with internal guidance issued by the Agency in June 2012.
- 1.8 We were concerned about the potential under-recording of complaints in the Accra visa section and at its spoke locations. We found that dissatisfied applicants were unable to make a complaint either in person or by telephone, despite staff being issued with guidance stating that complaints may be made in this way. We are also concerned that it is not easy to track the handling of a complaint due to a lack of detail on the complaints log.

- 1.9 We were pleased to find nothing which suggested that people were suffering discrimination or not being treated with respect. We were also satisfied that staff in Accra took seriously their obligations to safeguard children. In addition, we found that the visa section had good systems in place for protecting personal data.
- 1.10 We noted that a mystery shopping exercise had been conducted at the Visa Application Centre in Accra. This had led to an action plan to improve customer service.
- 1.11 Further examples showing how seriously managers viewed the need to provide good customer service were the introduction of a paper-based customer survey for applicants in Accra and the introduction of a priority visa service. However, we found that neither of these initiatives had been rolled out for applicants in spoke countries. We also noted that stakeholders had identified poor communication with applicants from spoke countries as a reason for customer dissatisfaction.
- 1.12 We were concerned to find no evidence of a transparent basis for the setting of ECO workloads. Coupled with the lack of consultation with staff around the setting of targets, this had impacted on staff buying into and understanding the targets. This was despite the Agency's acceptance of recommendations made by us in previous reports in this regard.
- 1.13 Similarly it was disappointing, in the light of findings in previous reports, that staff had little or no awareness of the existence of the risk register or the process for escalating risks.

We were also satisfied that staff in Accra took seriously their obligations to safeguard children

2. Summary of Recommendations

We recommend that the UK Border Agency:

1. Ensures that all complaints received, whether in person, by telephone, by email or in writing, are treated as complaints and each stage of the handling from receipt to conclusion is recorded accurately.
2. Keeps stakeholders and applicants informed where there are foreseeable delays in meeting its published customer service standards.
3. Conducts a review of ECO targets in the Accra visa section in line with its own guidance, ensuring that staff are consulted and understand how these are set.
4. Routinely analyses appeal outcomes in order to identify best practice and opportunities for improvement.

3. The Inspection

- 3.1 The role of the Independent Chief Inspector (‘the Chief Inspector’) of the UK Border Agency was established by the UK Borders Act 2007 to examine and report on the efficiency and effectiveness of the UK Border Agency. In 2009, the Chief Inspector’s remit was extended to include customs functions and contractors.
- 3.2 On 26 April 2009, the Chief Inspector was also appointed to the statutory role of Independent Monitor for Entry Clearance Refusals without the Right of Appeal as set out in section 23 of the Immigration and Asylum Act 1999 as amended by section 4(2) of the Immigration, Asylum and Nationality Act 2006 (regarding the introduction of the Points Based System from April 2008).
- 3.3 On 20 February 2012, the Home Secretary announced that Border Force would split from the Agency from 1 March 2012, to become a separate operational command within the Home Office. The Home Secretary confirmed that this change would not affect the Chief Inspector’s statutory responsibilities and that he would continue to be responsible for inspecting the operations of both the Agency and the new Border Force. On 22 March 2012, the Chief Inspector of the UK Border Agency’s title changed to become the Independent Chief Inspector of Borders and Immigration. His statutory responsibilities remain the same.
- 3.4 The Chief Inspector is independent of the UK Border Agency and Border Force, and reports directly to the Home Secretary.
- 3.5 The Chief Inspector’s inspection criteria¹ (set out in Appendix 1) were used to assess the efficiency and effectiveness of the visa section in Accra under the themes of:
- Operational Delivery;
 - Safeguarding Individuals; and
 - Continuous Improvement.
- 3.6 This inspection addressed the statutory remit of the Independent Monitor for Entry Clearance Refusals without the Right of Appeal.² This is set out in section 23 of the Immigration and Asylum Act 1999 as amended by section 4(2) of the Immigration, Asylum and Nationality Act 2006, regarding the introduction of the points-based system (from April 2008).

Purpose and aim

- 3.7 The purpose of this inspection was to examine the efficiency and effectiveness of the Accra visa section with a particular focus on decision-making quality in relation to visa refusals without a full right of appeal, specifically, Other Visitor³ cases. This includes applicants intending to visit the UK as tourists, business visitors or those wishing to study on a short-term basis.

¹ All criteria of the Independent Chief Inspector of Borders and Immigration can be found at <http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Inspection-Criteria.pdf>

² Although the formal title of the Independent Monitor refers to cases without the right of appeal, all requests for entry clearance in fact carry appeal rights on the basis of human rights and race discrimination grounds.

³ Visitor cases attracting only the limited appeal rights provided by s84(1)b and c Nationality, Immigration and Asylum Act 2002.

- 3.8 The inspection aimed to examine the quality and consistency of decision-making by assessing whether or not decision-making was:
- efficient, effective and fair; and
 - in line with relevant Immigration Rules and UK Border Agency policy and guidance.
- 3.9 The inspection also intended to measure the performance of UK Border Agency International Operations and Visas in respect of the information on ‘our service and values’ published on its website,⁴ which sets out the level of customer service people subject to Agency services can expect.

Background

- 3.10 The information in this section was provided by the UK Border Agency and sets out general background information about International Operations and Visas and the work of the Visa Section in Accra.
- 3.11 International Operations and Visas, formerly International Group, is a Directorate of the UK Border Agency formed in 2008 from UK Visas and other international policy strands. The directorate delivers the wider overseas remit of the UK Border Agency, including the visa issuing service, and is fundamental to achieving the Agency’s strategic objectives listed below:
- to protect the border and national interests of the UK;
 - to tackle border tax fraud, smuggling and immigration crime; and
 - to implement fast and fair decisions.
- 3.12 The most recently published International Operations and Visas Business Plan identified eight priorities for 2012/13. The priorities most relevant to this inspection were as follows:
- ‘Develop the infrastructure for good decision-making where the culture of improvement is the norm, including the new Decision Quality Dashboard highlighting decision reversals which will enable us to target issues preventing us getting decisions right first time;’ and
 - ‘With our commercial partners, expand and develop our premium and priority services to reflect the desire of business travellers and other priority customers for speed, consistency of service, facilitation of flexible travel and improved facilities.’
- 3.13 International Operations and Visas has approximately 2,400 staff in 130 countries around the world, working to deliver the government’s objective of facilitating trade and travel that benefits the UK and preventing travel which does not. To manage its work overseas, International Operations and Visas has structured its visa work into six regional locations:
- Africa;
 - Americas;
 - Asia Pacific;
 - Gulf, Iran and Pakistan;
 - EuroMed; and
 - South Asia

⁴ <http://www.ukba.homeoffice.gov.uk/aboutus/service/>

3.14 The Accra visa section forms part of the Africa region. This region includes over 50 countries and receives almost 360,000 applications annually.

Hub and Spoke

3.15 The redesign of the Agency's global network of visa sections began in January 2007 as part of a wider programme of change, supported by the introduction of biometrics⁵ and commercial partners.

3.16 This redesign allowed the Agency to think about how and where it considered applications, giving it an opportunity to make better use of its resources overseas. The redesign of the network into a Hub and Spoke business model aimed to deliver three main benefits:

- improved quality and consistency of decision-making;
- improved efficiency and productivity; and
- greater resilience and flexibility.

3.17 This business model has seen decision-making move from small visa sections to larger regional hubs or processing centres. In early 2007, there were over 150 posts around the world, working largely independently and handling all aspects of visa processing including the receipt of applications and decision-making. By mid 2012, there were 375 locations involved in processing visa applications (spokes) and 50 decision-making centres (hubs).

3.18 The Africa region operates a hub and spoke model, with decision-making consolidated into five principal hubs:

- Abuja;
- Accra;
- Lagos;
- Nairobi; and
- Pretoria.

The Accra visa section forms part of the Africa region. This region includes over 50 countries and receives almost 360,000 applications annually

The Accra Visa Section

3.19 At the time of our inspection, the Accra visa section received and assessed all applications for entry clearance made at the:

- British High Commission, Cameroon
- British High Commission, The Gambia
- Visa Application Centre (VAC) in Accra, Ghana
- British Embassy, Senegal; and
- British High Commission, Sierra Leone

3.20 Applications in Accra can be made by nationals of any country currently resident in Ghana, Burkina Faso, Equatorial Guinea, Ivory Coast, Liberia, Niger or Togo.

3.21 Applications can be made in Cameroon, the Gambia, Senegal and Sierra Leone by any national resident in those countries; however, those with temporary residence in these countries are limited in the category of visa that they can apply for.⁶

⁵ All visa applicants are routinely required to provide biometric data (ten digit finger scans and a digital photograph). There are some minor exceptions to this rule, e.g. heads of state and children aged under five.

⁶ Temporary residents can only apply for a visitor visa, a Tier 5 (temporary worker – creative and sporting) visa or an EEA family permit.

- 3.22 The VAC in Accra is operated by VFS Global, a commercial partner of the Agency, and operates five days a week. Applicants make an appointment to attend the VAC in order to submit their completed visa application form (VAF), supporting documents and to provide biometric data. Priority visa applicants have the option of attending the VAC without prior appointment between 08:00 and 10:00, Monday to Friday.
- 3.23 Figure 1 provides a breakdown of the type and number of applications assessed in Accra during the last financial year.

Figure 1: Number of applications decided between July 2011 and June 2012	
Category	Accra
EEA Family Permits	1,055
Family Visit	12,969
Other Non-Settlement	558
Other Visitor	27,941
PBS Tier 1 (highly skilled individuals)	134
PBS Tier 2 (skilled workers)	158
PBS Tier 4 (students)	2,496
PBS Tier 5 (temporary worker)	681
Settlement	2,699
Student	11
Transit	165
Work Permit	1
Working Holiday Maker	1
Total	48,869

The Application Process

- 3.24 The visa application process is set out in Figure 2 below.

Figure 2: Accra Visa Section - application process	
1	Applicants complete an online application form, book an appointment to have their biometrics taken and pay the relevant fee.
2	Applicants attend the VAC in Accra, which is operated by VFS Global, to submit their biometric data and their supporting documents and to pay the application fee if not done previously. If their documents are to be returned by courier at an additional charge, the return address is provided by the applicant.
3	If the application is made in Cameroon, Gambia, Senegal or Sierra Leone, applicants attend the relevant spoke to submit their biometric data, VAF and supporting documents. These are then sent to the VAC in Accra and then to the Accra visa section together with applications submitted in Accra.

Figure 2: Accra Visa Section - application process

4	The decision to issue or refuse entry clearance is made by an Entry Clearance Officer in the Accra visa section.
5	Applicants can track the progress of their visa applications via a free VFS Global ‘Track Your Application’ Service, or use the SMS text service for an additional charge.
6	The visa vignette or the refusal notice is printed and returned to the applicant, together with the original supporting documents via the VAC (for applicants in Ghana) or the relevant High Commission or Embassy (for applicants in spoke countries). The passport and decision can be collected in person from the VAC in Accra, or for an additional charge delivered to the applicant’s chosen address via courier. Similarly, for applications made at any of Accra’s spokes, the passport and decision can be collected in person from the relevant High Commission or Embassy, or for an additional fee the applicant can arrange for the passport and decision to be couriered to them.

Staffing

3.25 Figure 3 provides a breakdown of staffing numbers at the time of our inspection.

Figure 3: Staffing numbers in the Accra visa section

Visa Section staff	Number
Regional Director (Grade 6) – based in Pretoria	1
Regional Manager (Grade 7) – based in Accra	1
Regional Operations Manager (Senior Executive Officer) – based in Accra	1
Entry Clearance Manager (Higher Executive Officer)	3
Office Manager	1
Entry Clearance Officers (Executive Officer)	10
Entry Clearance Assistants ⁷	23
RALON staff	
RALON Regional Manager (Senior Executive Officer) – based in Pretoria	1
Immigration Liaison Manager (Higher Executive Officer)	1
Immigration Liaison Officers (Executive Officer)	2
Immigration Liaison Assistants	2
Total	46

Note: Information provided by UK Border Agency, International Operations and Visas

Scope

3.26 This was a short-notice inspection, so the UK Border Agency was only given three weeks’ notification that it would take place. Normally we would give only five days’ notice for this type of inspection, but it would not have been possible for the inspection team to obtain visas for travel to Ghana in such a short timeframe, so a longer notice period was appropriate in this case. These inspections are an important way of ensuring that the Agency is meeting its stated objectives and standards and is

⁷ This category includes support staff at various grades undertaking a range of roles in support of the visa operation.

doing so efficiently and effectively. This inspection provided an up-to-date picture of decision-making quality in Other Visitor cases, as all of the decisions in the cases we sampled were made in August 2012.

3.27 As this was a short-notice inspection with a main focus on decision quality, we did not conduct an in-depth inspection against all of the inspection criteria. However, as part of this inspection we carried out stakeholder interviews, staff interviews, observations and focus groups which enabled us to identify key issues of concern and areas of good practice against each of the criteria in scope. These are set out in Appendix 1.

Methodology

3.28 The on-site phase of the inspection took place between 1-4 October 2012. A range of methods were used during the inspection, including:

- reviewing a sample of 50 refusal cases with limited rights of appeal which had been decided in August 2012;
- interviewing the Regional Manager, Regional Director, Operations Manager, Entry Clearance Managers, Immigration Liaison Manager and Regional Strategic Planning Officer;
- conducting stakeholder interviews with the High Commissioners for Ghana and Cameroon, British Council and UK Trade and Investment;
- holding focus groups with Entry Clearance Officers, Entry Clearance Assistants and Immigration Liaison Officers;
- observing staff carry out their work at the visa section and VAC; and
- following the customer journey at the VAC.

3.29 On 4 October 2012, the inspection team provided feedback on high-level emerging findings to the UK Border Agency.

3.30 The inspection identified four recommendations for improvement in Accra. These are outlined on page 5.

4. Inspection findings – Operational Delivery

Decisions on the entry, stay and removal of people should be taken in accordance with the law and the principles of good administration.

- 4.1. This section provides detailed results and analysis of the files we examined during the on-site phase of our inspection in Accra.
- 4.2. Prior to the on-site phase of our inspection, we requested a randomly selected sample of 50 Other Visitor application case files drawn from a list of decisions made in Accra during August 2012. Figure 4 gives a breakdown of the composition of the sample we examined.

Figure 4: Files requested and received from the UK Border Agency

Category or Endorsement	Number sampled
General Visit	47
Visit – Business	1
Out of scope	2
TOTAL NUMBER OF FILES	50

- 4.3. We were pleased to find that the UK Border Agency was able to retrieve all of the files requested. Two of the applications were out of scope as they had applied under the General Visitor category, but were actually visiting family so were correctly treated as Family Visitors which gave them additional appeal rights.

We were pleased to find that the UK Border Agency was able to retrieve all of the files requested

Timeliness

- 4.4. At the time of our inspection, the UK Border Agency measured its performance against the following customer service standards: to complete 90% of non-settlement visa applications in not more than 15 working days, 98% in 30 working days and 100% in 60 working days.
- 4.5. Management information showed that in August 2012, when the decisions in our case file sample were taken, the Accra visa section only processed 39% of applications received within 15 working days. As a result it had failed to meet its target to process 90% of non-settlement cases within 15 days. The Agency had, however, met its targets to complete 98% of these cases in 30 working days and 100% in 60 working days.

- 4.6. The results of the file sampling showed that Accra was not meeting its customer service standards to process 90% of applications within 15 working days, but was meeting them for the standard of processing 98% within 30 working days and 100% within 60 working days. A snapshot of work in progress provided to us on 2 October indicated that of 1746 non-settlement cases awaiting a decision, 372 (21%) of them had already missed the 15 day target. The vast majority of these (364) were applications submitted in spoke countries. However, while we were on-site, we were told by managers that the post was now meeting all of its customer service standards.
- 4.7. Figure 5 shows the results of our file sample against the customer service standards.

Figure 5: Performance against customer service standards in Other Visitor refusal cases
Standards: to complete 90 per cent of visa applications in not more than 15 working days, 98 per cent in 30 working days and 100 per cent in 60 working days

Number of cases sampled	Total (48)		
	15 working days or under	30 working days or under	60 working days or under
Customer Service Standard	21%	100%	100%
Percentage of cases meeting the customer service standard	21%	100%	100%
Number of cases meeting the customer service standard	10	48	48
Number of cases that should have been processed to meet the customer service standard	43	47	48
Average processing time for whole sample (working days)	18		

- 4.8. Although we were told that there was some prioritisation for PBS applications, non-priority visit applications were treated on a 'first come, first served' basis, regardless of their proposed date of travel, unless there were compelling reasons to treat the application on an exceptional basis. For example, during our inspection the visa section prioritised the application of a senior Ghanaian law enforcement official who needed to travel to the UK for urgent meetings with his British counterparts in connection with an ongoing operation.

non-priority visit applications were treated on a 'first come, first served' basis, regardless of their proposed date of travel

- 4.9. In 22 of the 48 cases we sampled, the application was made at least 15 working days before the intended travel date. Of these, nine (41%) had not been decided by this date. All nine cases related to applications submitted in Yaounde, Cameroon. This can be both inconvenient and frustrating for applicants as the delay in processing a visa application may mean the purpose of the planned visit, for example to attend a conference or a family celebration, is no longer relevant, irrespective of the decision to grant or refuse the visa. As a result, this can have damaging reputational consequences for the UK.

Results of the sample of Other Visitor refusals of entry clearance in Accra

- 4.10. We examined refused Other Visitor entry clearance cases using various decision quality indicators, including:
- was the administration of the case sound?
 - was the decision to refuse entry clearance assessed against the correct Immigration Rules?
 - was the correct information on appeal rights provided to the applicant?
 - did the Entry Clearance Officer make their decision based upon all the available evidence? and
 - was the quality of the refusal notice adequate?
- 4.11. We were pleased to find that the decision to refuse the application was sound in all of the 48 refused Other Visitor cases examined. However, in two of the 48 cases we found that there was positive evidence on file which had either not been considered or was not referred to in the reasons given in the refusal notice. These cases are discussed in detail at paragraph 4.20 below.

Maladministration

- 4.12. We did not identify any instances of maladministration⁸ in this inspection.

Immigration Rules

- 4.13. We noted that the decision to refuse entry clearance was assessed against the correct Immigration Rules in all Other Visitor refusal cases.
- 4.14. We found that in two cases, applicants had applied using the General Visitor form, although they stated on the application that they were visiting close family in the UK. Although these were refused due to other reasons, we found that staff had taken a pragmatic approach in considering the application under the category which it should have been made (Family Visitor) and as a result the applicants were given a full right of appeal against the decision.
- 4.15. Staff told us that they considered this to be good customer service and that this pragmatic approach was applied to all applications where the wrong form might have been completed. Where the applicant had applied on a Family Visit form, but it was clear from the application that it was not a family visit or that there were serious doubts about the family connections as stated on the application form, the application was referred to an ECM. We were told that only in exceptional circumstances, where there were extremely strong grounds to believe the applicant had no appropriate family ties in the UK, would the application not be treated as a Family Visitor and the full right of appeal not given. The evidence from our file sampling was consistent with this approach.
- 4.16. Figure 6 provides details of a case study where an application had been made in error for a Family Visit visa but was treated as a General Visitor application.

⁸ Includes cases where the visa decision would or might have been different if there had not been an administrative failing. For example, an applicant applies for entry clearance to attend a fixed date conference in the UK. The visa would have otherwise been issued but is refused because a delay in processing the application means that the conference has already finished.

Figure 6: Case study – Application as Family Visitor considered as General Visitor

The applicant:

- was a 16 year old girl;
- applied for entry clearance on a Family Visit form accompanying her aunt's husband's brother to visit her aunt and her husband;
- provided only a statement from the aunt of their relationship.

The application was refused on the basis that:

- the applicant's accompanying adult was refused an entry clearance; and
- there was insufficient evidence of the applicant's own available funds.

Chief Inspector's comments

- We agreed with the reasons for refusing this application.
- The applicant was treated as a General Visitor due to the proposed relative in the UK being an aunt.
- Since 09 July 2012, changes to the Family Visit Appeals Regulations mean that applicants visiting an aunt, uncle, niece, nephew or first cousin are no longer entitled to a full right of appeal.
- We considered that it would have been helpful to the applicant if this change had been clarified in the refusal letter.

The UK Border Agency:

- confirmed that the refusal notice should have made it clear why the applicant was being assessed as a General Visitor.

Correct information given on appeal rights

- 4.17. We found that the correct information on appeal rights had been given in all Other Visitor refusal cases in our file sample.

Use of evidence in decision-making

- 4.18. We found two cases in our sample (4%) where the decision had not been made in line with all the evidence and where there was no record that the ECO had considered positive evidence which was on the file. Details of one of these cases are outlined in Figure 7 below.

Figure 7: Case study – Lack of clarity of consideration of positive evidence

The applicant:

- applied for entry clearance as a visitor for 10 days;
- provided evidence of his position as an accountant in his sister's company;
- provided his pay slips showing a net salary of 800 cedis per month;
- provided a bank balance of 7,000 cedis as at 7 May 2012;
- provided his sister's business bank account statement showing a fluctuating balance between 01/02/12 and 31/05/12 with a closing balance in excess of 15,000 cedis; and
- was refused because he had not provided evidence of the sponsor's family/personal/ financial circumstances and not shown that an outlay of 4,000 cedis was commensurate with his sister's circumstances. (At the time of the decision there were approximately 3.07 cedis to the pound).

Chief Inspector's comments

- The ECO had not considered the evidence on file showing that the applicant's own funds were in excess of the funds required for the visit.

The UK Border Agency:

- confirmed that the applicant's own funds should have been considered and referred to in the refusal letter and agreed to reconsider the application in light of this evidence.

Quality of refusal correspondence

- 4.19. We found the quality of the refusal notices to be variable. There were some excellent examples, clearly laid out, with a full explanation of what had been considered to inform the applicant what they would need to address in any future applications. However, there were also a number that did not show that all the evidence had been considered, were too brief, too long, contained irrelevant information or were confusing.
- 4.20. In addition to the two cases where positive evidence had not been considered, we found a further eight cases which, although not significant enough to fail the overarching indicator of 'decision not in line with evidence', did give us some concern as the refusal letter did not mention the positive evidence which had been considered. These generally concerned applications where the applicant had stated that a sponsor would be funding the visit, but had provided evidence of their own financial circumstances. It was not clear from the refusal letter whether the evidence of the applicant's own funds had been considered in reaching the decision. The Agency accepted this and agreed that this evidence should have been referred to in the refusal letters in these cases.
- 4.21. We found some excellent examples of clear refusal wording, in particular regarding why a business account of a limited company did not give access to funds without the agreement of all shareholders, and of considerations relating to the safeguarding of children, but they were not used consistently. The Agency told us it would be running a Data Quality session in the near future to discuss the wider use of standardised wording in its refusal letters.

We found the quality of the refusal notices to be variable

4.22. Of the 48 Other Visitor refusal files that we sampled, 24 related to insufficient evidence of funding, 11 had no evidence of the origins of the funds in an account, and eight were based on business accounts of limited companies being provided with no evidence that the applicant or sponsor had access to the funds.

ECM Reviews

4.23. We found that ECM reviews were being carried out in line with UKBA operational guidance, issued on 4 July 2012 based on recommendations we made in previous reports. Five of the 48 cases we sampled (10%) had received an ECM review and the decision had been upheld in all cases. This falls short of the target for ECMs to review 20% of all refusals where there are limited appeal rights as laid down in UKBA operational guidance. However, our file sample was relatively small and the Agency told us that ECMs are fulfilling this requirement.

General findings for the overall file sample

4.24. We were pleased to find that the quality of the decision-making was generally good, with only two out of 48 cases giving cause for concern. 46 of the 48 cases (96%) in our sample met all of our high-level decision quality indicators. However, we did have some concerns over the quality and consistency of the refusal notices, which have been accepted by the Agency.

Customs and immigration offences should be prevented, detected, investigated and, where appropriate, prosecuted.

Paragraph 320 of the Immigration Rules

4.25. Figure 8 provides an explanation of Paragraph 320 and its sub-paragraphs which were relevant to the inspection.

Figure 8: Paragraph 320 of the Immigration Rules

- Paragraph 320 covers a number of grounds for the refusal of entry clearance or leave to enter, which apply in addition to the grounds set out elsewhere in the Immigration Rules.
- Paragraph 320(1) is a ground for refusal when entry is being sought for a purpose not covered by the Immigration Rules.
- Paragraph 320(7A) is one of the general grounds for refusal and is used when a forged document has been submitted or false representations made on the application or material facts not disclosed – in these cases refusal of entry clearance will follow.

4.26. Although we did not specifically sample paragraph 320 cases as a separate category during this inspection, we did consider the application of paragraph 320 in the files we sampled. We identified three cases that had been refused under paragraph 320. We were satisfied that it had been applied appropriately in these cases and that they had been reviewed appropriately by the Entry Clearance Manager. We did not identify any cases where we considered that paragraph 320 was not applied when it should have been.

Risk and Liaison Overseas Network (RALON)

- 4.27. RALON is an intelligence operation delivering objectives across the fields of Air, Risk and Criminality and provides support to ECOs in their decision-making process by providing information and intelligence on known risks.
- 4.28. We received positive comments from staff and managers in both RALON and the visa section about the good working relationship between them. Entry clearance staff were encouraged to refer cases to RALON if they had any concerns although we were told that some entry clearance staff made referrals to RALON more often than others.
- 4.29. We were provided with examples of a risk profile that was produced by RALON and issued to entry clearance staff, highlighting types of applications where further checks should be carried out. This risk profile was regularly refreshed, although some entry clearance staff thought the risk categories were too general, as they applied to a very high proportion of the visa applications received in Accra. RALON also provided entry clearance staff with individual country profiles, refreshed quarterly, and had issued guidance to staff on child protection issues.
- 4.30. RALON produced a monthly analysis of asylum claims linked to visas issued by the Accra visa section, as a management tool to assist ECMs, drive continuous improvement in decision-making and provide feedback to ECOs.
- 4.31. We found that RALON had developed effective links with the Serious Organised Crime Agency and local law enforcement agencies as well as with other EU member countries in its airline liaison role.

Complaints procedures should be in accordance with the recognised principles of complaints handling.

- 4.32. We were informed that staff had received training in complaints handling in July 2012. We were provided with a copy of the complaints handling presentation, produced centrally by the Agency, used to deliver the staff training. The presentation made the following statement concerning how complaints may be made:

‘Complaints may be made by members of the public or their representatives and are accepted in any of the following formats:

- Letter;
- Fax;
- Face-to-face;
- Telephone; and
- Email.

We found that RALON had developed effective links with the Serious Organised Crime Agency and local law enforcement agencies

- 4.33. The presentation went on to state:

‘Record all complaints on the complaints log which is sent to your Nominated Responsible Officer on a monthly basis.’

- 4.34. In practice, however we were told that complaints were not accepted over the telephone or face-to-face either at the visa section in Accra or at any of the spoke locations. Instead, members of the public were told to write or email their complaint to the correspondence section at the Accra visa section. No details of the complainant or the complaint were logged at the time. This meant there was no means of checking whether all or any of these complaints were followed up in writing, or whether the complainant was dissuaded from complaining further by this additional hurdle.
- 4.35. We were also referred by staff to operational guidance, which stated that telephone complainants should be encouraged to put their complaint in writing. However, this instruction made no reference to whether telephone complaints should be logged or not.
- 4.36. We were told by staff that some complaints, for example complaints about delays in processing times, were responded to by means of a standard letter and that these complaints were not logged on the complaints register.
- 4.37. Complaints can present an organisation with the opportunity to make changes to processes and procedures, where appropriate, in order to improve the services it provides. This is only possible if managers are provided with a full picture as to the volume and types of complaints being received. We did not consider that the Agency could be confident that it had a comprehensive picture of the number and type of complaints received concerning the services provided by the Accra visa section.
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- Complaints can present an organisation with the opportunity to make changes to processes and procedures, where appropriate, in order to improve the services it provides*
-
- 4.38. We found, from a review of the complaints register, that the complaints that were being logged were being sent to an ECM or above to investigate, as required by the Agency's operational instructions. The instructions required that complaints were responded to within 20 working days. However, of the 12 complaints logged between June 2012 and August 2012 only five had received a response within this timescale. One complaint was logged as receiving a response outside of the timescale and there was no response date logged for the remaining six complaints. It was unclear to us whether this was an example of poor recording of complaints data or if these six complaints remained unresolved.

We recommend that the UK Border Agency:

- Ensures that all complaints received, whether in person, by telephone, by email or in writing, are treated as complaints, and that each stage of the handling from receipt to conclusion is recorded accurately.

5. Inspection Findings – Safeguarding Individuals

All people should be treated with respect and without discrimination except where the law permits difference of treatment.

Decision-making

- 5.1 Our file sampling found no evidence that decisions were being made other than in accordance with the Immigration Rules and the law. This was reinforced by our findings from focus groups and from our observations of the decision-making process. It was clear that staff treated each case on its own merits and did not discriminate on the grounds of nationality.
- 5.2 All staff confirmed that they had undertaken the Agency’s mandatory training in equality and diversity and this was confirmed by managers.
- 5.3 Our focus groups held with staff and observations of the decision-making process provided evidence that staff were aware of the Agency’s guidance on Ministerial Authorisations.⁹

Functions should be carried out having regard to the need to safeguard and promote the welfare of children.

We found no evidence to cause concern about risks of breaches of data security while in Accra

- 5.4 We were satisfied that staff at the Accra visa section took seriously their obligations to consider the need to safeguard and promote the welfare of children. Of the 4 cases in our sample involving children, none gave us cause for concern.
- 5.5 Staff and managers confirmed that all ECOs and above had undertaken the Agency’s mandatory e-learning on ‘Keeping Children Safe’.
- 5.6 We found that RALON was also proactive in this area. They had provided guidance to visa staff on child protection issues and had produced a report concerning the risks associated with the adoption of children in Ghana. We were told that the member of staff concerned had been commended by the Agency for her work on this report.

⁹ An authorisation under the Equality Act 2010 allowing for differentiation between nationalities in the entry clearance/visa process and allowing greater scrutiny of applications for nationals of countries covered by the authorisation.

- 5.7 Further evidence of RALON's proactivity regarding child protection issues was demonstrated by recommendations made by the RALON team in Accra concerning the use of DNA testing in cases involving children. These recommendations followed a pilot exercise in Africa.

Personal data should be treated and stored securely in accordance with the relevant legislation and regulations.

- 5.8 The ease with which files are provided by the Agency can be an indicator of the effectiveness and efficiency of the file storage processes employed. The Agency had no problem in retrieving all of the files contained within our sample and we saw evidence of a well-organised file registry in the Accra visa section.
- 5.9 We found that there was a clear desk policy in place. Each ECO had their own named tray in a secure room adjacent to the main working area where work still to be completed was stored overnight. At the end of the working day a sweep of the office was conducted by the duty ECO to ensure that all classified material or documents containing personal data had been secured.
- 5.10 We observed that all original documents submitted by applicants were kept in a separate wallet with the file so that they could be easily retrieved and returned to the applicants once they had been considered.
- 5.11 Staff and managers confirmed that they had undertaken the Agency's mandatory training in respect of information assurance.
- 5.12 We found no evidence to cause concern about risks of breaches of data security while in Accra.

6. Inspection Findings – Continuous Improvement

The implementation of policies should be continuously monitored and evaluated to assess the impact on service users and associated costs.

Customer Service

- 6.1 We were shown evidence of a mystery shopper exercise at the VAC, arranged by managers at the visa section, three weeks prior to our inspection. This had revealed shortcomings in the service received by applicants attending the VAC and had resulted in an action plan, still to be implemented, by the Agency's commercial partner, to improve its customer service. We were told that this exercise would be repeated in the future. Although this was the first time such an exercise had been carried out, we regard this as an example of good practice.
- 6.2 We also saw evidence of a paper-based customer survey, provided to applicants at the VAC. This was introduced in June 2012 in an effort to increase the amount of customer feedback in Africa. Prior to this, customers were invited to complete the Agency's online customer survey but the response rate was low in the Africa region. We noted, however, that this paper-based survey was not available to applicants applying in the spoke countries, where levels of satisfaction may differ from users of the VAC in Accra. In not offering this survey to all applicants, the Agency is missing out on an opportunity to obtain a more comprehensive understanding of customer service perceptions.
- 6.3 It was evident from our focus groups with staff that they were very keen to provide a good customer service. However, some expressed concerns about the level of service which had been provided to applicants over the summer period, when the visa section had not been meeting its external customer standard to deal with 90% of applications within 15 working days.
- 6.4 We were told that the primary reason for delay in deciding applications from spoke countries was the transit time between the spoke and the Accra visa section, which could be as long as one week in each direction.
- 6.5 In order to mitigate the impact of these delays in transit, the visa section now prioritises applications from spoke countries once received in Accra by applying a five day turnaround target for spoke country applications.
- 6.6 We were told that, during the summer peak, applicants in spoke countries were not advised of the likelihood that applications would take longer than 15 working days to process, even though it was known that the visa section in Accra was not meeting its external customer standards. We were told

It was evident from our focus groups with staff that they were very keen to provide a good customer service

by stakeholders of an incident at one of the spoke locations where this lack of communication had resulted in a sit-in protest by dissatisfied applicants. We consider that the Agency needs to improve its communication with stakeholders as well as applicants concerning difficulties in meeting customer service timescales. This could reduce the frustration expressed by applicants and the number of complaints received.

We recommend that the UK Border Agency:

- Keeps stakeholders and applicants informed where there are foreseeable delays in meeting its published customer service standards.

- 6.7 We noted that a priority visa scheme was introduced in July 2012 on payment of an additional fee. The scheme was available to:
- British Council sponsored applicants;
 - Ex Business Select Programme¹⁰ companies;
 - third country nationals¹¹ with previous travel to 5CC countries (UK, USA, Canada, Australia, New Zealand); and
 - Ghanaian, Ivorian, Togo and Burkina Faso nationals with previous travel and compliance to a 5CC country.
- 6.8 The above categories of applicant were only eligible to apply under this scheme if they had no previous refusals or adverse immigration history.
- 6.9 The priority visa scheme did not guarantee a maximum processing time for applications, but the Agency's commercial partner advised potential applicants on its website that experience had shown that applications could be decided within five working days.
- 6.10 No such scheme has been introduced, or is currently planned, for applicants in spoke countries. This is another example that highlights the differential treatment of applications made in spoke countries compared with applications made at the hub, and is something the Agency needs to consider.

Decision Quality

- 6.11 At the time of our inspection, ECOs in Accra had the following daily targets in respect of the processing of applications.
- straightforward: 60;
 - non straightforward: 40;
 - PBS: 25;
 - spoke: 35; and
 - settlement: 18
- 6.12 In previous inspection reports, we have recommended that the Agency 'Strategically assess whether the existing focus on the achievement of numerical targets is impacting negatively against decision-making quality'.¹² The Agency accepted the recommendation and subsequently issued guidance to staff on the setting of ECO productivity benchmarks in order to strike a balance between customer service, decision-making quality and the availability of resources. Despite this, we found that staff had not been consulted on productivity rates or involved in the setting of targets. None of the staff we

¹⁰ Former UKBA scheme for fast tracking visa applications for employees of accredited companies.

¹¹ In the context of immigration, the term used to refer to individuals applying for visas in a country that is not their country of origin.

¹² Independent Chief Inspector of Borders and Immigration 'An inspection of the visa section in Guangzhou', May – August 2010.

spoke to were aware of how these targets had been arrived at or could recall them ever being reviewed. There were differing views as to how achievable they were and the impact they had on decision-making.

We recommend that the UK Border Agency:

- Conducts a review of ECO targets in the Accra visa section in line with its own guidance, ensuring that staff are consulted and understand how these targets are set.

- 6.13 We found evidence of a thorough analysis of asylum claims made by applicants who have travelled using a visa issued in Accra. This was completed on a monthly basis and includes:
- a summary of the visa application and decision;
 - additional matters revealed at the asylum stage; and
 - a summary of other factors which the ECO may have considered before reaching a decision.
- 6.14 This analysis is provided to ECMs for the purpose of continuous improvement in decision-making quality and feedback is provided to the ECO who made the original decision.
- 6.15 Whilst the cases we reviewed attracted only limited rights of appeal, the decisions of ECOs in such cases should be based on the same evidential principles as in other categories of case which attract full appeal rights. An analysis of the reasons given by Immigration Judges for allowing or dismissing an appeal against the decision of an Entry Clearance Officer can assist with the continuous improvement of decision quality, therefore, even in those cases attracting limited rights of appeal. However, despite previous recommendations we have made in this regard, we found no evidence of any analysis of appeal outcomes in the Accra visa section with a view to improving decision quality.

We recommend that the UK Border Agency:

- Routinely analyses appeal outcomes in order to identify best practice and opportunities for improvement.

Staff suggestions

- 6.16 There were a number of channels available to staff for making suggestions such as the weekly Monday morning meeting for all staff or via the staff suggestion box. Managers also told us that they had an open door policy for staff and their suggestions. However, the suggestion box was not well used; there were no suggestions submitted during our inspection and only one submitted in the previous week. During our focus groups, staff told us that they did not believe that they had much influence on the way things were done or that suggestions would be given serious consideration.

despite previous recommendations we have made in this regard, we found no evidence of any analysis of appeal outcomes

Risks to the efficiency and effectiveness of the Agency should be identified, monitored and mitigated.

- 6.17 We were provided with a copy of the Accra visa section risk register; however, this was very much a work in progress, with very limited evidence of concrete mitigation of the two risks which had been identified. There were other risks which became evident during our inspection which we would have expected to feature on the local risk register but did not. An example of this was the impact of a lack of resources, which had led to a delay in processing applications. A specific instance was a lack of availability of trained forgery officers to perform checks where there was a concern over the genuineness of an official UK document. We were subsequently informed that risks which applied to the whole of the region were captured on the regional risk register and that the impact of staffing shortages was an example of such a risk. However, this risk had become an issue in the Accra visa section and it fell to local managers to mitigate its impact. We take the view, therefore, that it should have figured on the local risk register, notwithstanding its inclusion on the regional register.
- 6.18 We found very little awareness amongst staff of either the existence of the risk register or the process for escalating business risks. We were provided with minutes of recent management meetings; however, there was no evidence that the risk register figured in any of the discussions which were minuted. We made similar observations in previous inspections and have made recommendations concerning this issue, which have been accepted by the Agency. On 12 July, a new operational instruction was circulated to all staff within International Operations and Visas. The instruction provided advice and guidance on how to identify and report emerging risks to management. This was good practice and a positive move by the Agency. It was therefore of some concern that so little progress had been made in Accra.

We found very little awareness amongst staff of either the existence of the risk register or the process for escalating business risks

Appendix 1

Inspection Framework and Core Criteria

The criteria used in this inspection were taken from the Independent Chief Inspector's Criteria, revised in March 2011. They are shown below.

Inspection Criteria used when inspecting the Accra Visa Section

Operational Delivery

- Decisions on the entry, stay and removal of people should be taken in accordance with the law and the principles of good administration.
- Customs and immigration offences should be prevented, detected, investigated and, where appropriate, prosecuted.
- Complaints procedures should be in accordance with the recognised principles of complaint handling.

Safeguarding Individuals

- All people should be treated with respect and without discrimination except where the law permits difference of treatment.
- Functions should be carried out having regard to the need to safeguard and promote the welfare of children.
- Personal data should be treated and stored securely in accordance with the relevant legislation and regulation.

Continuous Improvement

- The implementation of policies should be continuously monitored and evaluated to assess the impact on service users and associated costs.
- Risks to the efficiency and effectiveness of the Agency should be identified, monitored and mitigated.

Appendix 2

List of stakeholders

During the inspection, we contacted and consulted with the following stakeholders:

- High Commissioner, Ghana;
- High Commissioner, Cameroon;
- British Council, Accra; and
- UKTI, Accra

Appendix 3

Glossary (last updated 23 March 2012)

Term	Description
A (return to Glossary)	
Agency	Refers to the UK Border Agency which, following the separation of Border Force on 1 March 2012, is responsible for immigration casework, in-country enforcement and removals activity, the immigration detention estate and overseas immigration operations.
Asylum	Asylum is when a country gives protection to someone who is attempting to escape persecution in their own country of origin. To qualify for refugee status in the UK, an individual must apply to the UK Border Agency (the Agency) for asylum and demonstrate that they meet the criteria as set out in the 'Refugee Convention'.
B	
Biometrics	All customers are now routinely required to provide ten digit finger scans and a digital photograph when applying for a United Kingdom visa. There are some minor exceptions to this rule, e.g. Heads of State and children aged under five.
C	
Case Work	The UK Border Agency term for the decision-making process used to resolve applications (for example applications for asylum or British citizenship).
Complaint	Defined by the UK Border Agency as ' <i>any expression of dissatisfaction about the services provided by or for the UK Border Agency and/or about the professional conduct of UK Border Agency staff including contractors</i> '.
Customer	Defined by the UK Border Agency as ' <i>anyone who uses the services of the Agency, including people seeking to enter the United Kingdom, people in detention and MPs</i> '.
D	
Data Protection Act 1998	The Data Protection Act requires anyone who handles personal information to comply with a number of important principles. It also gives individuals rights over their personal information.
Director	A senior UK Border Agency manager, typically responsible for a directorate, region or operational business area.
E	
e-Learning	Computer based training courses

Entry Clearance	<p>A person requires leave to enter the United Kingdom if they are neither a British nor Commonwealth citizen with the right of abode, nor a person who is entitled to enter or remain in the United Kingdom by virtue of the provisions of the 2006 European Economic Area Regulations. Entry clearance takes the form of a visa (for visa nationals) or an entry certificate (for non-visa nationals).</p> <p>These documents are taken as evidence of the holder's eligibility for entry into the United Kingdom and, accordingly, accepted as 'entry clearances' within the meaning of the Immigration Act 1971. The United Kingdom Government decides which countries' citizens are, or are not, visa nationals. Non-visa nationals also require entry clearance if they seek to enter the United Kingdom for purposes other than to visit and/or for longer than six months.</p> <p>More detailed information about Entry Clearance can be found on the UK Border Agency website: http://ukba.homeoffice.gov.uk/</p> <p>The Immigration Rules say that a customer making an application for an entry clearance as a visitor must be outside the United Kingdom and Islands at the time of their application and must apply to a Visa Section designated by the Secretary of State to accept applications for entry clearance for that purpose and from that category of applicant.</p>
Entry Clearance Assistant	Supports the visa application process.
Entry Clearance Manager	Manages the visa application process within a visa section.
Entry Clearance Officer	Processes visa applications making the decision whether to grant or refuse entry clearance.
H (return to Glossary)	
Home Office	The Home Office is the lead government department for immigration and passports, drugs policy, crime, counter-terrorism and police.
Hub and Spoke	<p>Prior to 2007, virtually all British diplomatic missions had a Visa Section. Each worked largely independently; handling all aspects of visa processing including taking decisions on site.</p> <p>Hub and Spoke was introduced to move away from the traditional model which was based on the physical presence of the Visa Section. The consideration of an application does not need to happen in the same place as it is collected.</p> <p>Applications can be moved from the collection point-the spoke- to the processing point-the hub. This separation between the collection network and the decision-making network aims to improve quality and consistency of decision-making; efficiency and flexibility. Work can be moved to staff rather than the other way round.</p>

I	
Independent Chief Inspector of Borders and Immigration	The role of the Independent Chief Inspector of Borders and Immigration was established by the UK Borders Act 2007 to examine the efficiency and effectiveness of the UK Border Agency and more recently, Border Force. The Chief Inspector is independent of the UK Border Agency and Border Force and reports directly to the Home Secretary.
Independent Monitor and legislation	<p>The legislation which established the role of the Independent Monitor for Entry Clearance Refusals without the Right of Appeal, was set out in section 23 of the Immigration and Asylum Act 1999 and amended by paragraph 27 of schedule 7 of the Nationality, Immigration & Asylum Act 2002 and Statutory Instrument 2008/310 regarding the points-based system (from April 2008).</p> <p>Section 23 of the Immigration and Asylum Act 1999, as amended by section 4(2) of the Immigration, Asylum and Nationality Act 2006, stipulates:</p> <ul style="list-style-type: none"> • The Secretary of State must appoint a person to monitor, in such a manner as the Secretary of State may determine, refusals of entry clearance in cases where, as a result of section 88A of the Nationality, Immigration & Asylum Act 2002 (c.41)(entry clearance: non-family visitors and students), an appeal under section 82(1) of that Act may be brought only on the grounds referred to in section 84(1)(b) and (c) of that Act (racial discrimination and human rights). • The Secretary of State may not appoint a member of his staff. • The Secretary of State must lay a copy of any report made to him under subsection (3) before each House of Parliament. <p>Although the legislation and the Independent Monitor’s formal title refer to ‘no right of appeal’, all customers have limited rights of appeal on human rights and race relations grounds. Parliament decides which categories of visa customers should not have full rights of appeal; the UK Border Agency’s role is to implement the laws set by Parliament and as interpreted by Government policies.</p> <p>John Vine, the Independent Chief Inspector of Borders and Immigration was appointed to this role by the Home Secretary on 26 April 2009, effectively bringing this work within his remit.</p>
L	
Locally Engaged Staff	Staff recruited directly by the British Embassy or High Commission in the country where they are employed.
M	
Maladministration	Includes cases where the visa decision would or might have been different if there had not been an administrative failing. For example, an applicant applies for entry clearance to attend a fixed date conference in the UK. The applicant would have been otherwise issued but is refused because a delay in processing the application means the conference has already finished.

O	
Other Visitor	Visitor cases that only attract limited appeal rights.
P	
Paragraph 320 (7a) – deception rules	From 29 February 2008, under Paragraph 320 (7A) of the immigration rules, an applicant must be refused entry clearance if false representations or documents are used, or material facts not disclosed, whether or not the false representations or documents are material to the application, and whether or not the deception is with the applicant’s knowledge.
Points-based system (PBS)	<p>On 29 February 2008, a new immigration system was launched to ensure that only those with the right skills or the right contribution can come to the United Kingdom to work or study. The Points-Based System was designed to enable the UK Border Agency to control migration more effectively, tackle abuse and identify the most talented workers. The system:</p> <ul style="list-style-type: none"> • combines more than 80 previous work and study routes to the United Kingdom into five tiers; and • awards points according to workers’ skills, to reflect their aptitude, experience and age and also the demand for those skills in any given sector. <p>Employers and education providers play a crucial part in making sure that the points-based system is not abused. They must apply for a licence to sponsor migrants and bring them into the United Kingdom; and meet a number of duties while they are sponsoring migrants.</p>
Post	See Visa Section.
R	
Regional Director	Senior manager responsible for one of the six Immigration Group regions.
Risk and Liaison Overseas Network (RALON)	An amalgamation of the former Airline Liaison Officer Network and Overseas Risk Assessment Unit Network. RALON has responsibility for identifying threats to the UK border, preventing inadequately documented passengers from reaching UK shores, providing risk assessment to the UK Border Agency visa issuing regime and supporting criminal investigations against individuals and organisations which cause harm to the UK.
Risk Profile	An outline that determines the relative potential harm (to the UK of a visa applicant / travelling passenger) based on characteristics of an individual when compared to existing evidence of adverse activity either in the UK or overseas.
S	
Service complaint	Category of complaint concerning the way that the UK Border Agency works, for example delay, lost documents or administrative failings. These complaints are both about the actual service provided and the operational policies that the Agency operates.

U	
United Kingdom and Islands	The United Kingdom is made up of England, Scotland, Wales and Northern Ireland. The Channel Islands and the Isle of Man are not part of the United Kingdom. The geographical term 'British Isles' covers the United Kingdom, all of Ireland, the Channel Islands and the Isle of Man.
United Kingdom Border Agency (UKBA)	The agency of the Home Office which, following the separation of Border Force on 1 March 2012, is responsible for immigration casework, in-country enforcement and removals activity, the immigration detention estate and overseas immigration operations. The UK Border Agency has been a full executive agency of the Home Office since April 2009.
V	
Visa Nationals	<p>Visa nationals are those who require a visa for every entry to the United Kingdom. A visa national is a national of a country listed on the UK Border Agency website (Appendix 1 of the Immigration Rules). Some visa nationals may pass through the United Kingdom on the way to another country without a visa, but in some circumstances they will require a direct airside visa or visitor in transit visa. Visa nationals must obtain Entry clearance before travelling to the United Kingdom unless they are:</p> <ul style="list-style-type: none"> • returning residents; • those who have been given permission to stay in the United Kingdom and, after temporarily leaving the United Kingdom, return within the duration of that permission to stay; • school children resident in a European Union member state who are on an organised school trip from a general education school and accompanied by a teacher.
Visa Section	UK Border Agency office that manages UK visa operation services. UK Border Agency Visa Sections are located in a variety of locations around the world.

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