



Home Office

# **EU Settlement Scheme**

## **Private Beta Testing Phase 2 Report**

21 January 2019



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# Summary and lessons learned

Private beta phase 2 (PB2) of the EU Settlement Scheme has been successful, with 29,987 applications submitted from 1 November to 21 December 2018, enabling us to prove the functionality of the end-to-end online application process. We are grateful to those individuals and organisations that participated.

Feedback from applicants on the speed and ease of the application process has been positive. By 14 January 2019, 27,211 decisions had been made and issued, with no cases refused. The technology has performed well and the caseworking experience has also been positive.

PB2 has provided further valuable insights as to the experience of applicants in using the system and has helpfully identified areas for improvement and clarification.

In light of the PB2 experience we have made several changes to the application process and the information that we provide. These include:

- Updated communications and guidance material to help applicants prepare for and complete the application. The information that is published alongside, and provided within, the application process will remain under review.
- Increasing the size of file an applicant can upload in support of their application if required, and some minor technical changes to upload functionality.
- Introducing new functionality to allow an applicant to change their email address should, for example, a verification email from the Home Office be blocked by a host authority.
- Introducing technical safeguards against any disruption in the automated checks of HMRC or DWP data, in the event of a system outage between the application process and those departments.
- A new screen within the application process to help applicants check whether they hold a valid permanent residence document.

# Introduction

Following the successful first private beta testing phase of the EU Settlement Scheme from 28 August to 17 October 2018,<sup>1</sup> PB2 was launched on 1 November 2018. This phase included the EU Exit: ID Document Check app, which enables applicants to verify their identity remotely without having to send in their identity document, as an integrated element of the end-to-end online application process.

PB2 was implemented gradually to bring the system up to scale in a controlled way and allow for incremental improvements to be made in response to applicant feedback:

- From 1-14 November 2018, 524 applications were submitted via pop-up application centres at three more NHS Trusts in north-west England, alongside several sessions for staff from the 12 NHS Trusts and three universities in that region involved in private beta 1.
- From 15 November 2018, PB2 was widened to include applications from staff of higher education institutions across the UK on the Tier 4 Register of Licensed Sponsors, made independently by the applicant on their own device rather than at a pop-up centre.
- Also, from 15 November 2018, five Local Authorities in England were able to start making or supporting applications for 'looked after' children in their care and seven civil society organisations in England were able to do the same for vulnerable citizens receiving their support.
- From 3 December 2018, a link to the application system was cascaded, via the Department of Health and Social Care and the Devolved Administrations, to those working in the health and social care sectors across the UK.

To support applicants under the scheme, the Settlement Resolution Centre (SRC) was opened to accept email queries from 22 October 2018 and telephone calls from 24 October 2018. 13 locations (mostly provided by Local Authorities) offered an identity document scanning service, for a small additional charge, for applicants without access to an android device (on which the app can currently be accessed) to complete the identity verification process via the EU Exit: ID Document Check app.

As part of PB2, a range of communications and engagement activities were undertaken with the higher education, health and social care sectors. The Home Office ran a series of webinars in collaboration with key partners and cascaded a communications toolkit via a broad range of organisations. A collection of supporting guidance for applicants was also updated and published on GOV.UK.

Findings in this phase cannot be extrapolated to identify the likely applicant experience for all 3.5 million resident EU citizens and their family members. The PB2 cohort is not reflective of all individuals who will be eligible to apply to the EU Settlement Scheme, since it was selected in part to support the testing of specific aspects of the system, for example the identity verification app and automated checks of HMRC and DWP data.

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752872/181031\\_PB1\\_Report\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752872/181031_PB1_Report_Final.pdf)

## PB2 objectives

The primary objectives of PB2 were to test the following elements of the end-to-end process in a live environment:

- The application front end – what users see;
- The simplicity and ease of the application process for users, including the clarity of guidance and communications material and the EU Exit: ID Document Check app;
- Applicants' experience and behaviours during the application process;
- How straightforward it was for applicants to prove their continuous UK residence, including further testing the automated checks with HMRC and DWP;
- The experience of UK Visas and Immigration (UKVI) caseworkers during the decision-making process;
- How the technology performed; and
- How well more vulnerable applicants were able to make an application and what types of support they required.

## PB2 performance data

- 29,987 applications were received over 51 days.
- Over a third of applications (11,609) were submitted in the last five days of PB2.
- The largest number of applications (2,906) was submitted on 21 December 2018.
- 27,211 decisions had been made and sent out to applicants by 14 January 2019 (decisions are emailed, with a link to the online status service to enable the person to check their status).
- 19,105 (70%) were granted settled status, of which 2,925 were based on holding valid permanent residence (PR) documentation or existing Indefinite Leave to Remain (ILR).
- 8,106 (30%) were granted pre-settled status.
- No decided cases were refused.
- 69% of decided cases were processed in three working days, with 81% processed within a week.
- Of the 2,776 cases awaiting a decision as at 14 January 2019, the majority were incomplete or awaiting further evidence. This is because:
  - The applicant needed to submit their passport for verification (around a third of the cases), but some had not yet been able to do so as they were travelling over the holiday period.
  - The applicant had erroneously claimed to have a valid PR document and so had benefitted from a fee exemption to which they were not entitled (around a third of the cases).
  - A smaller proportion of cases were held pending further evidence of residence to be submitted from the applicant. UKVI is working directly with these applicants.
  - The remainder were held pending a series of minor technical updates to the caseworking system due to take place in the week commencing 14 January 2019 or were subject to other clarifications.

Separately, of the 1,053 cases that applied under the first phase of testing (private beta 1), all have now been granted status under the scheme. Of these:

- 681 (65%) received settled status;
- 372 (35%) received pre-settled status; and
- No cases were refused.

# Other issues

## Customer satisfaction and feedback

As part of our commitment to improving the application process for applicants, feedback was sought via an online survey. The survey was undertaken voluntarily by applicants after they had submitted their application form. In total, 1,330 PB2 applicants completed the survey, which covered a variety of elements from communications to the different stages in the application process. The results presented below are from that group of 1,330 applicants.

Most applicants who completed the feedback survey found the application form easy to complete. In total, 77% of applicants, when asked how easy or not it was to complete their application form, reported that it was very or fairly easy, and 70% of applicants agreed that the application form was quicker than expected to complete and a further 13% neither agreed nor disagreed that this was so. In total, 80% of applicants would either speak highly (61%) or give a neutral response (19%) about the application process if asked.

The information and support services available to applicants were considered helpful. For example, among applicants who used GOV.UK when filling in their application form (621 applicants), 89% found the guidance on GOV.UK very or fairly helpful, and of those who used the Settlement Resolution Centre when filling in their application form (94 applicants), 89% found it very or fairly useful. Most applicants reported that, overall, the information they had seen or received improved their understanding of the EU Settlement Scheme: 79% agreed, while 15% neither agreed nor disagreed.

## Proving identity – the EU Exit: ID Document Check app

A key part of PB2 was to test the full end-to-end online application process, and specifically how the new Home Office EU Exit: ID Document Check app performed as an integrated part of this process. The app allows applicants with a chipped identity document to confirm their identity and the validity of their identity document remotely. The app worked very well in PB2, with 90% of applicants successfully validating their identity via the app, removing the need for them to submit their identity document to the Home Office for manual verification.

Over 500 different types of android device (from 52 different device manufacturers) were successfully used by applicants to undertake the identity verification process via the app. Just under 80% of applicants completed this part of the process in under 10 minutes.

Whilst the app performed well in PB2 across a wide range of devices, there were users who experienced difficulty when reading their passport chip and we are taking steps to improve the guidance and support available to applicants. Additional help text on using the app has been added to application screens, including more prominent messaging to applicants to call the Settlement Resolution Centre should they encounter technical difficulty. Experienced call handlers have received additional training to support callers through this process. The Home Office is also producing a short video to demonstrate how to use the app.

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There were some technical constraints with certain devices that contributed to this difficulty, for example near field communication (NFC) capability on some older devices is less powerful than on newer ones which means users need to be more precise when searching for the chip in their identity document. Other applicants tried using the app with the NFC capability disabled in their smartphone's settings. In many of the cases where these issues occurred, applicants simply skipped this stage of the process and were requested to submit their document to the Home Office for manual verification. In almost every such case UKVI was able to read the chip of the passport submitted, highlighting the need for clearer guidance on using the app. Where the applicant sent in their passport, it was checked and sent back to them within 24 hours.

For PB2, all applications were made using the app. When the scheme is fully open by 30 March 2019, there will be multiple ways that an applicant can verify their identity: the app will be one option, but alternatives will include the applicant posting their document to the Home Office or visiting a local 'chip check' service run by a Local Authority or other provider.

### Proving UK residence

The EU Settlement Scheme is designed so that applicants can rely on government-held data to prove their UK residence automatically, minimising the evidential burden on them, and this was particularly successful in PB2. Of the 27,211 decisions made and issued by 14 January 2019, 22,723 cases (84%) did not need to provide any additional evidence of UK residence. The decision was made on the basis of automated checks made against HMRC and DWP data, or because the applicant already held a valid PR document or ILR.

On two occasions during PB2, there was a technical disruption preventing HMRC data being returned to applicants, and on one occasion this resulted in the service being temporarily suspended. Around 380 applicants were impacted, they were contacted by UKVI and checks against HMRC and DWP data were conducted manually by caseworkers. A save and return function has now been implemented as a safeguard against future disruption of this nature.

The size of file an applicant could upload if supporting evidence was needed was initially limited to 2MB. Feedback from applicants highlighted that a larger file size was required and so this was increased to 6MB. Further minor technical changes were made to the document upload process in response to specific issues raised by a small number of applicants.

### Converting documented PR status into settled status

EU citizens and their family members who have documented permanent residence (PR) status will need to make an application to convert this to settled status (Indefinite Leave to Remain, ILR, under the EU Settlement Scheme). Those with existing ILR do not need to do so but can do so if they wish. In both scenarios the scheme application is free and there is no requirement for the applicant to re-evidence their UK residence. During PB2, 2,925 applicants with documented PR status or existing ILR were granted settled status on that basis.

Some applicants believed that they had documented PR status when they actually held a different type of status, usually a registration certificate or residence card issued under the

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EEA Regulations which looks very similar to a permanent residence document. Almost 1,000 people in PB2 mistakenly believed that they had documented PR status or existing ILR. UKVI is continuing to work with these applicants to clarify the status they hold and will accept an application fee payment from them where appropriate (there is a fee exemption under the scheme for those with documented PR status or existing ILR) so as to be able to conclude their application. A new screen has been built within the application system to more clearly demonstrate what a permanent residence document looks like.

### Administrative review

PB2 included scope for applicants to apply for an administrative review by the Home Office of certain decisions under the EU Settlement Scheme. 11 such administrative review applications had been received and processed by 14 January 2019, with a further 13 pending. In all 11 cases the applicant was challenging a grant of pre-settled status rather than settled status. One of these grants of pre-settled status was upheld following the administrative review and the other 10 were instead granted settled status. Of these 10, nine of the applicants had originally accepted a grant of pre-settled status when making their application and then provided additional evidence of their eligibility for settled status with their application for administrative review.

The page in the application process which provides the applicant with the opportunity either to accept or challenge the length of time they have been continuously resident in the UK (and so whether they are issued settled or pre-settled status, where they do not instead show that they qualify for settled status with less than five years' continuous residence where particular criteria are met) has been reformatted and simplified to help prevent similar errors from being made in the future.

### Email validation

All applicants in PB2 were required to provide an email address as part of their application. These details were validated by the applicant via a link which was sent to the email address provided. Some applicants did not receive their validation email because either the applicant had incorrectly inputted their email address or the validation email was blocked by an applicant's employer. Various updates have been made to the system to mitigate this issue, including new functionality to ask applicants to input their email address twice and allowing applicants to change the address they had initially used if they did not receive a validation email.

### Settlement Resolution Centre

The Settlement Resolution Centre (SRC) has been set up to receive calls and emails to support applicants through the EU Settlement Scheme application process. The team of over 200 staff work across shift patterns of 8am – 8pm on Monday to Friday and 9:30am – 4:30pm at weekends. In PB2, the SRC took a mix of calls (70%) and emails (30%) from applicants through various stages of the process from pre-application enquiries to post-outcome questions.

In PB2, the SRC received 10,628 calls and 4,654 emails from applicants. Around 34% of calls related to applicants asking about making an application, and around 44% were from applicants with questions whilst making an application.

Applicants were able to contact the SRC to enquire about specific elements of the scheme and were able to highlight specific challenges they were facing with the application process, which were directly fed back into the programme team daily. Applicants were supported in the application process, and by identifying key behaviours and challenges, the SRC knowledge base was improved.

## **Vulnerability cohort**

PB2 included scope for applications from EU citizens with more complex needs, who were either being supported by one of seven community organisations<sup>2</sup> or were 'looked after' children in the care of one of five Local Authorities.<sup>3</sup>

296 applications were submitted through these channels. Of 251 decisions made in respect of this group by 14 January 2019, 67% had been granted settled status under the scheme and 33% pre-settled status. All those submitting an application used the EU Exit: ID Document Check app, albeit often with support.

A dedicated telephone line for the participating organisations was established to support those in this cohort applying to the scheme during PB2. The issues identified through this feedback were mostly in line with other feedback channels, including the need for more guidance on using the app and for increased document size upload capacity. In addition, some feedback confirmed that an alternative paper application form would be of benefit to this cohort, and this will be provided for the full opening of the scheme from 30 March 2019.

For the most part, feedback from applicants in this cohort was positive, noting the speed of decisions in many cases and that it was very easy to provide evidence of residence. Other useful and constructive feedback that was provided is being worked through with the organisations taking part. In particular, it should be noted that the participating organisations gave considerable support to these individuals, including advising them in advance on what types of document they would need. The Home Office will be providing grant funding of up to £9m in 2019-20 to enable a range of charities and other community groups across the UK to offer practical support to vulnerable EU citizens and their families in applying under the scheme.

The Local Authorities taking part in PB2 found that not all their cohort of 'looked after' EU citizen children had a passport and were therefore unable to take part in PB2. This will feed into wider consideration of evidence of identity under the scheme, ahead of its full launch by 30 March 2019. For those applications made for 'looked after' children, the Local Authorities reported that the process was simple, quick and easy.

## **Identity document scanner locations**

In PB2, the Home Office worked with Local Authorities to put in place 12 locations where applicants could access an android device loaded with the identity verification app. A

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<sup>2</sup> Ashiana, Cardinal Hume Centre, Coram Children's Legal Centre, East European Resource Centre, Rights of Women, Roma Support Group and St. Vincent Support Centre.

<sup>3</sup> Kent County Council, Lincolnshire County Council, London Borough of Haringey, London Borough of Waltham Forest and Sheffield City Council.

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further such location was operated from the UK Visas and Immigration Premium Service Centre in Belfast.

A total of 220 appointments were conducted, with uptake increasing over the weeks that PB2 operated. Initial findings highlighted the importance of clear communications around the role of this service, and the point at which identity verification must be completed within the application process (i.e. prior to the rest of the application form being completed). In conjunction with Local Authorities, the Home Office will make communications around this point clearer, including within the pre-application materials and at the point of booking an identity verification appointment.

Following successful testing in PB2, the Home Office will work with partner organisations during the public test phase from 21 January 2019 to substantially increase the network of identity document scanner locations, building towards national coverage for the full opening of the scheme by 30 March 2019.

### Assisted digital service

In PB2, the Home Office introduced a limited assisted digital service to support applicants without the appropriate access, skills or confidence to complete the online application process. This involved an initial telephone-based triage, with applicants offered telephone-based support (which constitutes most of the assisted digital support provided in other application routes). There were 39 calls to the assisted digital service during PB2: most called either because they had not received an invitation to apply during PB2 or because they did not have access to an android device. Seven callers who did require assisted digital support, and were offered this over the telephone, preferred to wait until face-to-face support is available as part of the next test phase. For the public testing phase from 21 January 2019, face-to-face assisted digital support will initially be available in 50 locations. These will gradually be increased to provide national coverage by 30 March 2019.

### Caseworking

PB2 afforded the opportunity for the new casework system to be robustly tested. Caseworkers found the new system quick and easy to use. Direct contact with a range of applicants has enhanced understanding of how applicants are engaging with the application process, including those with more complex needs. In addition, PB2 was the first opportunity to test the integration of the SRC and caseworking process. This worked well, ensuring that key information was passed through to caseworkers quickly and accurately.

The quantity and range of applications received in PB2 has enabled identification of some issues in case flow which will be rectified in advance of the next phase of testing. A significant number of caseworking enhancements have also been delivered in response to operational feedback, improving the caseworker experience and efficiency.

## Next steps

The public beta testing phase of the EU Settlement Scheme will commence on 21 January 2019. This phase will be open to resident EU citizens (and EU citizen family members) with a valid passport as a national of that EU country and to their non-EU citizen family members with a biometric residence card. As in PB2, applicants in this phase will need to be able to access an android device, through the range of options available for this, in order to use the EU Exit: ID Document Check app to confirm their identity as part of the application process.

Applicants without access to such a device will be able to apply using a postal route for submitting identity documents to the Home Office once the scheme is fully open by 30 March 2019.

