



Home Office

**BIOMETRIC RESIDENCE PERMITS FOR
OVERSEAS APPLICANTS -
ALTERNATIVES TO CUSTOMER
COLLECTION AT POST OFFICE:
Alternative Collection Locations and
Standing Authority.**

Updated: Version 6, March 2022

1. Background

- 1.1 In 2015, following input from larger sponsors and representatives¹, the Home Office developed two alternatives to the customer² collecting their own Biometric Residence Permit (BRP) card package at Post Office branch selected during the AccessUK application process. Those alternatives are now extended to a wider range of users and some of the initial constraints removed.
- 1.2 The alternatives are intended to meet four objectives:
 - 1.2.1. to alleviate short lived, but potentially heavy and localised, pressure on Post Office branches at the start of the academic year;
 - 1.2.2. to reduce the number of students younger than 18 requiring a Responsible Adult to accompany them at an in person collection, reducing footfall in Post Office branches and transport impacts on students and schools;
 - 1.2.3. to recognise the right of representatives to deal with Home Office in place of their client;
 - 1.2.4. to provide an alternative means of BRP collection for those applicants who are unable to attend the Post Office in person where the entry clearance has not been endorsed in their passport.
- 1.3. Applications to operate either of the alternatives are predicated on the customer having agreed to pursue the alternative route. Customers have an absolute right to be in possession of a BRP – it evidences the leave granted to them and will be their only proof of status and entitlements after their 30 day vignette expires. They have an absolute right to collect in person, subject to the presence of a Responsible Adult for customers younger than 18.
- 1.4. There are two types of Alternative Collection method discussed in this guidance, that is Alternative Collection Locations (ACL) and Standing Authority (SA).

¹ In this document “representative” means a person who is an immigration adviser regulated by OISC or who is a member of another regulated body within the legal profession

² The migrant to whom entry clearance was granted

- **Alternative Collections Locations:** Organisations can request to be an ACL subject to meeting the requirements set out in this guidance. It allows BRP cards to be sent directly to the ACL to distribute to their students, clients or employees.

It negates the need to attend a Post Office branch to collect your BRP and is often more convenient.

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- **Standing Authority:** Enables a person or persons(s) from a particular organisation to collect BRPs from a Post Office branch on behalf of individuals who may be students, clients or employees of that organisation.

2. “Within 10 days of arrival”

2.1 The decision letter issued by Entry Clearance Officers should now make clear that customers are required to collect their BRP by the later of:

- the expiry of their short term travel vignette
- 10 days after arrival in the UK

2.2 There will occasionally be delays in the production or delivery of BRPs. Where this means that the customer cannot take possession of their BRP within the timescales above they will be deemed, for civil penalty purposes, to comply with that requirement if they take possession of the BRP within 10 days of it becoming available at their chosen Post Office or ACL site. It is therefore important that ACLs ensure that the BRP can be collected as soon as it is available at the ACL and that SAs collect the BRP at the earliest opportunity and pass it on to the customer without delay.

3 Alternative Collection Location (ACL)

3.1 ACL accreditation is offered to:

- Students;
- Skilled Worker Premium Sponsors, their representatives and agents;
- A small group of other very large volume PBS sponsors;
- Legal representatives;

3.1.1 All staff handling BRPs, or who have access to BRPs, and are involved in the allocation of BRPs, even if for a short period such as university enrolments, must be ACL accredited by BIDMU (the UKVI team who oversee and accredit ACL and SA), as set out below.

3.1.2 This ACL guidance relates to **any** BRP being held at an ACL, regardless of whether they are in-country applications for further leave to remain or out of country applications for leave to enter. All BRPs held by an ACL must be stored and recorded in line with the following guidance.

3.1.3 UKVI reserve the right to carry out periodic audits of the procedures being followed by ACLs to ensure they comply with this guidance. Failure to implement this guidance could result in suspension or withdrawal of ACL accreditation.

3.1.4 All staff who are ACL accredited must be aware of and adhere to the following key principles of ACL:

- Secure the BRP at all times to prevent loss, theft and abuse of the immigration system;
- Ensure the integrity of the immigration system by carrying out the appropriate identity checks before distributing the BRP;
- Report early any problems relating to a BRP to BIDMU so that they can be resolved, including loss of a BRP(s);
- Keep BIDMU informed of any changes to ACL accredited staffing, including new joiners and leavers;

3.1.5 Should you have any general question or problems relating to ACL you can refer them to one of the following email boxes or contacts who will aim to respond within 5 working days:

- Schools - SCHCollection@homeoffice.gov.uk
- Other Student sponsors - HEICollection@homeoffice.gov.uk
- Skilled Worker Premium Sponsors, Representatives and other invited groups - LREMCollection@homeoffice.gov.uk

3.1.6 Once ACL accreditation is approved it can, during busy periods, take up to 14 working days for your new ACL code to be activated. ACLs should not advise customers of their ACL code until it is confirmed as active by BIDMU.

3.2 Logistics:

3.2.1 BRP card packages will be delivered to a site specified by the sponsor or representative, this will be known as the Alternative Collection Location (ACL);

3.2.2 Each site will be allocated an ACL code, to be used during the AccessUK application process;

3.2.3 ACL codes should be issued within three working days of application;

3.2.4 Operators will be told when their ACL code is scheduled to be live on AccessUK, and will need to manage customer expectations accordingly.

There are two-weekly deployments of new ACL codes to AccessUK between June and August, and monthly deployments at other times of the year;

- 3.2.5 When customers reach the AccessUK screen *Biometric Residence Permit Collection* they should enter the ACL code in the *Alternative Location* field;
- 3.2.6 It will not be possible to switch an application already made on AccessUK from collection at Post Office to ACL, but third party collection will be available subject to certain limitations (see below);
- 3.2.7 Where an ACL site operator needs to offer more than one site for direct delivery they can request additional ACL codes. Note: UKVI recommend that sites with large numbers of customers requiring collection of BRPs or where sites are difficult to travel to or some distance from your main ACL, you should consider obtaining separate ACL codes, ensuring the appropriate security procedures are in place at each ACL in line with this guidance;
- 3.2.8 An operator may choose to have all packages delivered to one ACL site before transporting cards to another non-ACL site for distribution. If you choose to do this you must ensure you have a fully trackable and auditable process in place for sending and receiving packages between sites, either using internal mail services or using a service similar to Royal Mail Track and Trace. All staff handling BRPs at the non-ACL site must be ACL accredited and operate the same handling procedures set out in this guidance. BIDMU recommend that geographically distant sites for the same organisation should consider setting up their own ACL code for each site to reduce the need for BRPs to be moved in this way which has the potential to increase the risk of loss, for which the ACL would be responsible.
- 3.2.9 All sites used to store or distribute BRP card packages must comply with the basic security measures for storage of, access to, and transportation of the card packages. This will include checks on the staff involved (security guidance starts at page 14);
- 3.2.10 Only nationals of an EEA state or Switzerland, who have either pre-settled or Settled status under the EU Settlement scheme or who have current Indefinite Leave to Enter or Remain will be approved to handle BRPs as part of ACL site operations;
- 3.2.11 The Home Office will not itself re-route card packages between ACL sites;
- 3.2.12 A site operator can re-route card packages between its own ACL sites using its own processes after packages are received from the Home Office, however they must have clear processes in place ensuring they maintain the security of BRP packages as set out in this guidance at all times.

3.2.13 It is recommended that all ACLs ensure that they have more than one member of staff ACL accredited as a contingency.

3.3 Applications for ACL accreditation:

3.3.1 Return the *Request for ACL* form to the relevant mailbox:

- Schools - SCHCollection@homeoffice.gov.uk
- Other Student sponsors - HEICollection@homeoffice.gov.uk
- Skilled Worker Premium Sponsors & Representatives and other invited groups
LREMCollection@homeoffice.gov.uk

3.4 Completing the form

3.4.1 Do not complete Section B of the form until you have read and understood the guidance notes;

3.4.2 It is critical that the site address provided in Section B will **prevent** the package going **directly** to the named customer;

3.4.3 The customer's name will always appear as the first line on the BRP package label, ahead of the site address provided, so you must think about how the address you provide will ensure that the card reaches your staff and not the customer directly;

3.4.4 An **unacceptable** site address, because the card could go directly to a named student there, is:

Fairbright College
Falling Lane
Upper Falling
AA1 2ZZ

3.4.5 An **acceptable** version would be:

Fairbright College
c/o Tier 4 Compliance Team
Falling Lane
Upper Falling
AA1 2ZZ

3.4.6 Each address line is restricted to 44 characters, including spaces. While apostrophes and hyphens are allowed do **not** include commas in address lines;

3.4.7 When completing Section C of the form please note that you must have seen the *original* identity document, not a *copy* of it. An expired British passport may be accepted, provided it bears a good likeness of the person nominated.

4. Dependants

4.1 As an approved ACL operator you can, if you wish, take delivery of the BRPs for dependants of the applicant you have sponsored. It is your responsibility to ensure that you communicate clearly to your applicants whether your ACL code may be used only by them, or whether you permit its use by their dependants.

4.2 When issuing a BRP please check the vignette to see whether the applicant has any dependants. This may make it easier for an operator to confirm whether they are likely to be holding BRPs for dependants.

4.3 It is recommended that each ACL keep a record of dependants of applicants who are likely to utilise the ACL for collection of their BRPs. This will ensure the ACL is aware of who is likely to request collection at their ACL and prevent unnecessary communication with BIDMU ACL team who coordinate the scheme.

5. Establishing the main applicant – dependant link

5.1 The main applicant's vignette should record the name, date of birth and gender of any dependants, while the vignette of any dependant will contain a reference to the name and date of birth of the main applicant.

5.2 Example

Kimberley Shoeman has two young daughters, Kayla and Jessica, who have been granted entry clearance as Kimberley's dependants. You will see that:

- the name, date of birth and gender of each dependant appear on Kimberley's vignette;
- Kimberley's name and date of birth appears on the vignette of each dependent.

Notes:

- A vignette may not explicitly state *Dependant of*. You may accept such a vignette provided that the cross referenced biographic details appear on the vignettes.
- The name of the main applicant may also appear at the end of the 'Leave Category' on the vignette.

- Real vignettes are individually numbered – you would not expect to see the same serial number across multiple vignettes as on the dummy versions shown.





5.3 A BRP remark will confirm that a card is for a dependant, but it will not state the name of the lead applicant. ACL operators needing to confirm the identity of the lead applicant should send an email to the relevant BIDMU mailbox (see page 3) providing:

- BRP number
- name of dependant as on BRP
- date of birth as on BRP

6. Standing Authority

6.1 Offered to:

- PBS sponsors who do not operate ACL;
- Representatives who do not operate ACL;
- Agents acting for representatives of Premium Sponsors;
- Also available to those operating ACL, for applications which pre-date ACL.

6.2 For reasons of resource efficiency within the Home Office sponsors who make regular use of either the accompanying Responsible Adult process or third party collection will be **required** to use the Standing Authority process rather than being issued with an individual approval for each transaction.

6.3 Each member of staff from each organisation applying for SA will now be issued with their own Standing Authority letter in compliance with GDPR practice.

6.4 **NOTE:** from 13 May 2019 all nationals of Australia, Canada, Japan, New Zealand Singapore, South Korea and USA will no longer have their visa stamped by an

Immigration Officer on entry to the United Kingdom. They will be encouraged to use ePassport Gates on arrival. Where e-Passport Gates are not available they will be seen by an Immigration Officer, but their visa will no longer be stamped, except in very limited circumstances, which are:

- Tier 5 creative and sporting concession Certificate of Sponsorship (CoS) holders
- Short Term Students
- Individuals coming to take part in Permitted Paid Engagements
- Individuals who are coming to join their EEA family member in the UK

As a result, it will no longer be possible to use Standing Authority for these nationals. It will be necessary for the Post Office to see the customer in person to verify that they have entered the UK, as set out in section 6.4.3 below, this includes children under the age of 18.

We recommend that those organisations who use Standing Authority to collect customer BRPs from the Post Office, consider requesting ACL for their organisation so that BRPs can be sent directly to you for distribution by your organisation. To do so please contact the relevant inbox as set out in section 3.3 above.

For all other nationals the Standing Authority process can be used as detailed below.

6.3 Logistics:

- 6.3.1 The card package must be collected from the Post Office branch selected during the AccessUK application process, the SA should advise the applicant prior to the applicant making the AccessUK application which Post Office branch they should select;
- 6.3.2 The Home Office **will not** become involved in requests to change Post Office branch should a mistake be made, the customer or their representative should contact the Post Office to make any such changes, a fee may be charged by the Post Office to do so;
- 6.3.3 As the Post Office will undertake the required identity verification checks prior to issuing the BRP(s) to the SA there is no restriction on the nationality of those nominated as a SA;
- 6.3.4 Any person nominated as a SA who is not a national of the EEA or Switzerland must either have current leave or not require leave;
- 6.3.5 Those nominated to act as a SA will be subject to the same checks as those nominated to operate ACL;
- 6.3.6 Those approved to act as a SA will be provided with a letter of authority for use at a *single* named Post Office;

- 6.3.7 If the nominated person needs to visit several Post Office branches a letter of authority will be issued for each branch;
- 6.3.8 The letter will normally be “good for use” at that named branch for two years, unless the nominated person’s leave to enter or remain ends earlier. After that two year period SA must be applied for again;
- 6.3.9 The letter will allow the nominated person to collect any package they itemise on a *Schedule* form;
- 6.3.10 The schedule may only itemise a migrant customer to whom the PBS sponsor has issued a CAS or CoS, or by whom the representative is currently instructed. Proof of instruction must be provided to BIDMU as part of the SA application process;

6.4 Action at Post Office:

- 6.4.1 The SA must present to Post Office staff their own *unexpired* identity document *as detailed* in the Home Office letter of authority;
- 6.4.2 The customer’s passport must be presented to Post Office staff, along with the Home Office letter of authority;
- 6.4.3 The vignette in the customer’s passport must have been endorsed by the Immigration Officer’s landing stamp on arrival in the UK – if the vignette has not been endorsed the customer **must** collect in person (see 6.4 above);
- 6.4.4 The Post Office will refuse to proceed with the transaction if any of the documents required are missing, not as specified in the letter of authority or the vignette has not been endorsed;

6.5 Applications:

- 6.5.1 Return the *Request for 3P SA* form to: SACollection@homeoffice.gov.uk
- 6.5.2 When completing Section C of the form please note that the identity document to be used by the person nominated to act as the SA *must be current*. Letters of authority will be “short dated” to less than one year if either the SA’s identity document or their leave to enter or remain expires sooner.
- 6.5.3 The details provided in the form will be used by the Home Office to carry out the appropriate security checks. The details provided may also be used to communicate with those applying for Standing Authority, but will not be shared with any other party apart from those required to conduct the appropriate checks.

7. Security guidance for ACL sites

7.1 Physical security for sites holding more than 10 BRPs

- 7.1.1 Where an ACL is likely to hold more than 10 BRPs packets at any one time BRP packets must be stored in a safe meeting the standard Eurograde EN1143-1, or equivalent, which provides insurance cover for cash to the amount of £10,000. For reference, 1,000 BRP packets occupy approximately 1.68 cubic feet³.
- 7.1.2 While it is preferable to have a dedicated safe, the Home Office recognises that this will not always be cost effective either because relatively low card volumes are held or because there is marked seasonality in the card holding. As a minimum, there must be a clearly identified and segregated “BRP area” within the safe in which no other material is stored while BRPs are being stored. This might, for example, be achieved by allocating a specific and labelled shelf to BRP storage, or by filing BRPs in clearly marked trays within the safe.
- 7.1.3 Where seasonality does exist, ACLs may follow the guidance set out in 7.2 below during low volume periods, and then follow guidance set out here in 7.1 during high volume periods. Clear audit trails must be in place at all times.
- 7.1.4 The BRP safe must be located in a secure room, to which limited numbers of staff have access. Where there is a concern over the suitability of a secure room BIDMU should be contacted for advice at the appropriate email address set out in paragraph 3.1.5 of this guidance above.
- 7.1.5 If the safe is a key operated safe the key should be stored in a digital key safe which only ACL accredited staff have access to.
- 7.1.6 Home Office approval to handle BRPs is not a requirement for staff to access the secure room but it is a requirement for access to the BRP safe. Where a safe is used to store BRPs and other material ACL site operators may, for operational reasons, need staff who use “other material” to have access to the BRP safe.
- 7.1.6.1 Where BRPs are stored loosely within the safe, any staff member who requires access to the safe for any purpose will need to be ACL accredited by the Home Office in the same way as those who handle BRPs as part of their normal duties.

³ A pack of 100 BRPs has dimensions of 115mm (H) x 230mm (W) x 180mm (D)

7.1.6.2 If the BRPs are stored separately within a locked container within the safe, and only ACL accredited staff have access to the key or

security code to access the locked container, then other staff who access the safe do not need to be ACL accredited.

7.1.7 The combination or key for the BRP safe must be known to, or accessible by, only those staff approved to handle BRPs. The safe must be locked whenever unattended by approved staff and the key or combination stored securely. More than one ACL accredited staff member should be aware of the safe combination or how to access the key as a contingency.

7.1.8 While cards must always be stored overnight, or when unattended, in an appropriate safe they do not have to be issued directly from the safe. As an example, during large student enrolment events a university registry may wish to take a batch of cards outside the secure room for issue to students. In these circumstances cards may be moved within or between sites in a locked container and accompanied by an ACL accredited member of staff at all times.

7.1.9 The type of container used should be appropriate to the volume of cards being moved. When at an issuing point cards must remain within the sight and under the control of an ACL accredited member of staff. Cards must not be left in an area to which a person not authorised to handle them is likely to have either uncontrolled or easy access.

7.1.10 All staff involved in the issuing of BRPs at enrolment events must be ACL accredited, even if they only access BRPs during these events and at other times of the year have no other involvement in ACL processes;

7.1.11 More than one member of staff must be ACL accredited as a contingency and know the combination to the safe and/or digital key safe in order to access the BRPs.

7.1.12 If you are required to transport BRPs to other off-site locations, this must only be carried out by ACL accredited staff members. They must transport them directly to the place where they will be issued as set out in 7.1.6 and 7.1.7 above.

7.1.13 BRPs must not be transported on public transport such as train, bus, or tram, even if contained within a locked container. They may be transported in a private vehicle, private taxi or hire vehicle, providing the locked case is in the possession of the ACL member of staff at all times, and the driver goes directly to the issuing site without taking unnecessary or unauthorised detours e.g. they should not be taken to other unrelated meetings, or left unattended while staff carry out other duties. Security of the BRPs must be considered at all times.

7.2 Physical Security for sites holding fewer than 10 BRPs

- 7.2.1 Where an ACL holds fewer than 10 BRP packets at any one time the following security processes must be followed, considering seasonality as set out in section 7.1.2 above.
- 7.2.2 BRP packets must, as a minimum, be stored within a secure locked box to which only ACL accredited staff have access to the key or digital access code. The secure box, should ideally be stored within a safe for additional security, but may be stored within a lockable cabinet or cupboard, to which only limited staff should have access and the key stored securely.
- 7.2.3 If BRP packets are stored in a key operated secure box, the key should be stored in a way that ensures only ACL accredited staff have access to it, ideally using a digital key safe. BRP packets may also be stored as set out in 7.1.2 and 7.1.5 above.
- 7.2.4 All staff handling and issuing BRPs must be ACL accredited by BIDMU, following the procedures set out in section 7.3 below.
- 7.2.5 More than one member of staff must be ACL accredited as a contingency and know the combination to the safe and/or digital key safe in order to access the BRPs.
- 7.2.6 While cards must always be stored overnight, or when unattended, in an appropriate safe or secure locked box as set out in 7.2.1 and 7.2.2, they do not have to be issued directly from the secure locked box or safe. As an example, there may be situations where an ACL may take the BRP packet directly to their student, employee or client at another location in order to issue it directly to them. In these circumstances cards may be moved within or between sites in a locked container or brief case and accompanied by an ACL accredited member of staff at all times. The combination of the brief case or lock for the container must only be known or accessible to ACL accredited staff.
- 7.2.7 Where transporting BRPs to alternative locations for the purpose of issuing to the rightful holder section 7.1.12 must be followed.
- 7.2.8 The ACL must keep an auditable log of all BRPs being stored and contact BIDMU without delay should there be any issues with the reconciliation of this log against stock held, see Section 7.5 Audit Procedures for more information.

7.3 Personnel security

- 7.3.1 To reduce risk, site operators should ensure that only a limited number of staff handle and distribute BRPs, commensurate with the size of the card holding and the timescale for distribution where there are seasonal peaks in activity. It is not necessary to obtain such approval for mailroom staff.
- 7.3.2 More than one member of staff should be ACL accredited at each ACL site as a contingency and should be fully aware of this guidance and local handling procedures.
- 7.3.3 Only nationals of an EEA state or Switzerland, who have either pre-settled or Settled status under the EU Settlement scheme, or any Third Country nationals who have current Indefinite Leave to Enter or Remain will be approved to handle BRPs as part of ACL site operations. Irish citizens may also be approved under the Common Travel Agreement rules. A non EU or EEA national who holds pre-settled status under EUSS will not be approved.
- 7.3.4 Site operators must provide on Form ACL Section C the following details of staff nominated to handle BRPs:
- full name;
 - date of birth;
 - nationality;
 - passport or national identity card details⁴.
- 7.3.5 The ACL form should be sent to the relevant email address shown in Section 3.1.5. Postal submission of these details can be arranged for any site operator that does not wish to provide them by email, although this will delay processing. For the postal address please contact the relevant email address detailed in Section 3.1.5.
- 7.3.6 The Home Office will undertake basic background checks, which will include reference to the Police National Computer and internal Home Office records. By nominating a person, the site operator confirms that the person has consented to checks being conducted. This information may be used to communicate with ACL accredited staff, but will not be passed on to any other party beyond the checks detailed.
- 7.3.7 If a nominated person fails the background checks the Home Office will notify the site operator that the person is not approved to handle BRPs but will not disclose the reason. In all other cases the Home Office will confirm that those nominated have been approved to handle BRPs.

⁴ An original document, **not** a copy, must have been seen by the employer. An expired British passport can be accepted if the photograph therein remains a good likeness of the employee.

7.3.8 Site operators are encouraged to submit check requests in good time. Check requests submitted by email will normally be processed within five working days of receipt, but may take longer during peak periods. Requests

submitted by post will normally be processed within ten working days of receipt.

7.3.9 **Only** ACL accredited staff may handle and distribute BRPs. If refused ACL accreditation that member of staff will no longer be permitted to have access to BRPs under the ACL process.

7.3.10 Should a member of staff leave your organisation or no longer require ACL accreditation BIDMU should be informed without delay via the appropriate inbox as set out in Section 3.1.5, in order that we can keep our records up to date.

7.4 Pre-processing

7.4.1 Some site operators may wish to complete internal administration tasks requiring the BRP package to be opened and the card detached from the carrier letter before the migrant arrives, eg, a university wanting to scan or copy the BRP to the student's file and enter data on university systems ahead of a large scale registration event.

7.4.2 The Home Office has no objection to such pre-processing. However, when the customer attends for collection site operators must:

- complete the bulleted actions set out at *Check the passport* below; and
- hand over to the migrant the personalised carrier letter to which the card was originally affixed.

7.5 Identity verification prior to issuing a BRP

7.5.1 The ACL must be satisfied that the applicant collecting their BRP has entered the UK and is present within the UK at the time the BRP was issued, the best way to ensure this is to conduct face to face verification in person.

7.5.2. However, where this is not possible or practical face to face verification may take place via Skype or similar system providing the ACL is satisfied that the applicant has entered the UK and, at the time of verification, is located within the UK. Once the following verification checks have been successfully completed the BRP may be sent to the rightful holder, we recommend use of a trackable mail service such as Royal Mail Track and Trace, use of such

services is at the risk of the ACL and applicant BIDMU/UKVI will not be liable for any losses incurred through use of such services or the cost of replacing a BRP as a result of such a loss;

7.5.3 If an ACL is found to have issued a BRP without carrying out the appropriate verification checks, or in the full knowledge that the applicant is not in the UK the Home Office reserve the right to withdraw ACL accreditation immediately.

7.5.4 Check the passport:

- It does not matter if the vignette has expired by the time the BRP card collection is attempted;
- The passport number on the vignette must be the same as on the passport;
- The name on the vignette must be the same as on the passport and the BRP carrier letter (though note that a “long name” may have been truncated either on the vignette or on the carrier letter);
- The photograph on the passport biodata page and on the vignette must closely resemble the face of the migrant present;
- Where the migrant entered the Common Travel Area at a point other than the United Kingdom (ie via Ireland, Guernsey, Jersey, or the Isle of Man) the passport will have been endorsed but **not the vignette**. In such cases the date on the arrival stamp in the passport must be within the thirty day validity range shown on the vignette;
- In all other cases you should expect the vignette to have been endorsed by a UK Immigration Officer, although the Officer’s landing stamp appears elsewhere. Provided the date of the landing stamp endorsement is within the thirty day validity range of the vignette this can be accepted.
- If the vignette has not been endorsed the process may continue **provided** the applicant is seen by the operator during the transaction.

7.5.4 If the checks above are all satisfactory the BRP package will be opened (if not already opened during pre-processing). The card will be removed and the facial image checked against the customer. If that final check is satisfactory then the BRP package can be issued to the migrant⁵, having first taken a copy of the BRP for your records;

⁵ **Schools** can follow the standard practice that they adopt for receipt and safe custody of passports and in-country BRPs, ensuring that, where relevant, a student’s BRP is stored in a secure location after “issue” as set out in Sections 7.1 and 7.2i

7.5.5 If any of the above checks fail then the ACL site must contact BIDMU to confirm next steps by sending an email titled "Verification failure" to the appropriate email address set out in Section 3.1.5. You should retain the

BRP packet until advised by BIDMU. You may be asked to return the BRP package by registered post.

7.6 Audit procedures

7.6.1 Check any consignment note against the BRP packets delivered. Small volume deliveries will not be accompanied by a consignment note, though each package is likely to have been signed for. Large volume deliveries will be accompanied by a consignment note that summarises only the total number of cards in each pouch or container.

7.6.2 Raise a query with the carrier immediately if the total shown on the consignment note does not reconcile to pouches or cards actually received;

7.6.3 Report to BIDMU any BRPs that are not for your site using the appropriate email address set out in Section 3.1.5, providing the BRP package numbers and await advice on next steps;

7.6.4 Return any BRPs that remain uncollected to BIDMU having been stored for more than 60 days. Contact BIDMU to confirm arrangements in advance using the contact details set out in section 3.1.5. BIDMU will hold all BRPs while they remain valid unless informed otherwise;

7.6.5 In your covering letter you should detail the BRPs being returned and, if known, why the BRP is being returned, for example if you are aware that the applicant no longer requires the BRP and the BRP can be destroyed.

7.6.6 Uncollected BRPs should be returned by recorded delivery to:

ACL Team

P.O. Box 195, Bristol,

BS20 1BT

7.6.7 If after returning the BRP to BIDMU the rightful holder enters the UK and is able to collect or receive the BRP please contact BIDMU using the appropriate email address set out in section 3.1.5. to arrange re-delivery. This will only be possible if BIDMU weren't previously informed that the BRP is no longer required and the BRP has been destroyed. If this is the case the applicant will be required to apply for a replacement card at their own cost.

7.6.8 The ACL should be able to confirm BRP movements should the need arise:

- Reconcile BRP packets against any consignment note that accompanied the delivery (not applicable to small volume deliveries or if consignment notes were not provided by the delivery partner);
- Store any such consignment note for twelve months as a record of BRP receipts;
- Have a means of determining the date when a BRP was issued to the migrant. This can be held in another auditable system or record that you use already for your business and which can be shown to Home Office staff should the need arise;
- Maintain a log of any BRPs returned to BIDMU.

7.6.9 ACLs will prepare and retain for a period of three years a quarterly reconciliation of their BRP stock. The *Reconciliation* form template can be used on request to BIDMU.

7.6.10 ACLs may be asked at any time to provide copies of their reconciliation reports as an audit of their record keeping. Failure to keep accurate records may result in suspension or withdrawal of ACL accreditation.

7.6.11 Although the exemplar *Reconciliation Form* includes rows for each month of the quarter the site operator is free to use another sub-interval, or no subinterval. The first quarter will begin in the month that you take delivery of your first card as an ACL site. The data below will relate to activity in the relevant quarter only, and will not be cumulative over successive quarters:

- The number of errors reported to the carrier;
- The number of BRPs received that were not for the institution;
- The number of BRPs for the institution that were received from the courier and stored;
- The number of BRPs issued;
- The number of BRPs returned to the Home Office;
- The number of BRPs transferred to another ACL site operated by the same sponsor or representative;
- The number of BRPs remaining in store;

7.6.12 If using the exemplar, the *BRPs unaccounted* for cell will auto-calculate. Any positive entry in this cell must be reported to BIDMU in the same way as a security breach.

7.6.13 Maintain details of security breaches and provide a report to BIDMU on the form supplied within two working days of discovering the breach. Where it is possible to identify the serial number of any cards lost this should be included in the report.

7.7 Effect of breaches

- 7.7.2 Should an ACL experience a loss or theft of BRPs or a serious breach of security which has put at risk the security of BRPs in their possession, the ACL must inform BIDMU at the earliest opportunity by contacting the email inbox as set out in Section 3.1.5.
- 7.7.3 If such a security breach takes place UKVI and BIDMU expect full cooperation from the ACL involved and all ACL accredited staff. Failure to do so is likely to result in suspension of ACL accreditation pending a full review of the circumstances and cooperation from those involved;
- 7.7.4 In such a circumstance, the Assistant Director (AD) for BIDMU, or an appropriate deputy, will lead a review into compliance with the ACL guidance at that location;
- 7.7.5 The AD is likely to suspend all BRP deliveries to that location until a full review of the circumstances are established. The AD may decide to suspend the ACL accreditation of individuals involved in the security breach or the ACL site itself pending the outcome of the review;
- 7.7.6 It is likely an urgent site visit will be organised by UKVI Sponsor Management Unit (SMU) and a report compiled to ascertain the immediate circumstances of the security breach, in order to inform the AD what measures should be put in place to ensure the ACL is fully compliant with the ACL guidance;
- 7.7.7 Further, it is likely the AD will request a full report from the ACL Lead, to be provided within 5 working days, setting out the circumstances of the loss and requiring further details as requested by the AD at that time;
- 7.7.8 Following consideration of the site visit report and the ACL Lead report the AD will consider whether:
- Further information is required from the ACL lead before further measures are taken;
 - Improvements need to be made to fully comply with the ACL guidance as a matter of urgency;
 - Immediate suspension or termination of ACL accreditation due to serious breach or breaches of ACL guidance leading to a complete breakdown of trust in the ability of that location or ACL accredited staff members to secure BRPs and implement the ACL guidance to UKVIs satisfaction.
- 7.7.9 UKVI reserve the right to conduct site visits on occasion in order to ensure compliance with the ACL guidance. ACLs are expected to allow the authorised UKVI auditor access to any location or member of staff that is involved in the ACL process. Failure to allow UKVI auditing staff access during a site visit, without good reason, may result in the suspension or termination of ACL accreditation;

- 7.7.10 If repeated breaches of ACL guidance are identified UKVI reserve the right to suspend or terminate ACL accreditation for the site or individuals;
- 7.7.11 It is not anticipated that an ACL site operator would *knowingly fail to implement* these guidelines, or *knowingly attempt to subvert* them, but such behaviour would call into question their suitability to act as a sponsor or representative;
- 7.7.12 BIDMU/UKVI will at all times seek to work with ACLs to address breaches in a way that will enable them to remain compliant with guidance and avoid suspension or termination of ACL accreditation in order to reduce the impact on applicants.