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# MANAGEMENT SUMMARY

## INTRODUCTION

1. This audit was undertaken as part of a revised work plan for IND/NASS for the year, following discussions at an Audit Committee Meeting. It is one of six areas of NASS operations to be reviewed in the current financial year.

# **OBJECTIVES & SCOPE**

- 2. Our objective was to provide an assurance on the adequacy and effectiveness of the controls in place to ensure effective communications between the relevant parts of the Home Office to enable the efficient cessation of support for asylum seekers. See Appendix 2 for further detail.
- 3. Our evaluation included reviewing the processes for communicating the asylum application decision, the cessation of NASS support and notification of this cessation to relevant bodies. The role of the computer systems and processes for dealing with families were also reviewed.
- 4. Our work was carried out during October 2001. The review consisted of interviews with various staff involved in the processes and an examination of procedures in operation. Testing was undertaken as appropriate.
- 5. It should be noted that towards the conclusion of this audit review, the ICD computer system, ACID was being replaced by A-CID.

# SUMMARY OF FINDINGS

- 6. We were pleased to see that the Leeds Waterside Pilot had been set up and was developing well. The Pilot was set up to try to improve processes involved in asylum cases and links between the various people involved in these processes. We observed that staff from various parts of IND are located in the same building and actively share information and co-operate with one another. They have one overriding access database accessible to all staff where details of cases, from start to finish, are recorded.
- 7. We were also pleased to note that the Removals/Cessations Integration Project has recently started in Croydon. This is attempting to forge closer links between cessations and removals to try to streamline the processes and remove as many refused asylum seekers from the country as possible.
- 8. We were however, greatly concerned about the lack of data integrity on the computer systems used by NASS staff. There are several different systems used by the various parts of IND. These include the A-CID system in ICD, the ASYS system in NASS and the CRISH system in IS. These systems do not interface well and staff do not have access to, or utilise, all systems. This greatly increases the risk of inputting errors and misinterpretation of data.
- 9. The Status Terminations Teams within NASS rely heavily on lists produced from the A-CID system (formerly ACID), in order to cease support for asylum seekers who have had a decision made on their case. Many problems have been encountered with these lists, including missing, incomplete or inaccurate information. This has lead to delays in the

cessation of support and increased costs to NASS.

- 10. At the time of audit, the information on the ACID lists for refused cases had become so unreliable that no cessations of refused cases had been undertaken since September 2001. Some 1600 refused asylum cases are usually received each month for support to be ceased. If this number of cases is assumed outstanding for October (i.e. support has not been ceased although the asylum case has been determined), we estimate that the costs of continuing voucher and accommodation support for such numbers amounts to over  $\pounds 1$  million per month. This is an unnecessary cost to NASS. Cessation of support for refused cases should be resumed.
- 11. To improve the current situation, we suggest that all users of A-CID and ASYS should be given training as to the information which is required to be recorded on the system, the necessity of the prompt and accurate input of this data, and the purposes for which it is used.
- 12. We were particularly concerned regarding one case identified from an ACID list. The case on the list referred to a man who had died in August 2000 according to ASYS. Further examination of both ASYS and ACID revealed that his wife also had a claim. However, there were many inconsistencies between the details on the two systems. On ASYS, the wife still has an outstanding claim and is receiving NASS support in the form of vouchers, although ACID indicates that a decision on the case was dispatched in October 2000. The status of the claim is uncertain, and NASS may be incurring unnecessary cost. The case highlights problems with inconsistencies in data between the various computer systems. This case needs to be looked into as a matter of urgency, and details are included at Appendix 4 of this report.
- 13. We found that delays of around 3 to 4 months can occur between the decision date and dispatch dates for port cases. In these cases, the papers are passed to the port to dispatch the decision. This can be contrasted with "in country" applicants who usually have their decision dispatched to them within a few days of the decision being made. We therefore recommend that when a decision is taken on a port case, the caseworker responsible for the case should dispatch the decision. This should ultimately reduce the time between decision date and the cessation of NASS support, thereby reducing NASS costs.
- 14. Our examination of a selection of cases from an ACID grants list revealed two cases of twenty examined where NASS support in the form of vouchers was allocated and paid after a positive decision (asylum or leave to remain granted) had been reached on the cases. This could be due to data regarding the decision not being promptly entered onto ACID. It also indicates that staff involved in assessment and allocation and those in the change of circumstances team do not look at information on ACID before granting NASS support. These instances are an unnecessary cost to NASS. Better staff training and awareness is likely to have prevented this error occurring.
- 15. We were concerned that there are no formal written procedures for cessations staff to refer to. This can result in inconsistency of approach and a risk of non-compliance with rules and regulations. Testing revealed inconsistencies when dealing with cases on ACID lists where the outcome date on the system is after the dispatch date. This is illogical, as the decision cannot be dispatched to the asylum seeker until it has been reached. The correct procedure for such cases was stated to be to reject them and not to cease support. However, for three of the six cases identified, support had been ceased.

- 16. We were concerned to observe that there was a lack of communication and co-operation between the various parts of IND (ICD, NASS, IS). Procedures are very fragmented and compartmentalised. This means that the processes in operation are not generally designed with the whole system in mind and may lead to poor use of resources and duplication. Whilst the removals/cessations integration project may partially address these issues, we feel that the systems should be reviewed and procedures improved to ensure the most efficient processes are in place.
- 17. Our Recommended Actions for improvements in control are listed in the Detailed Findings at Appendix 1, and are reproduced in Recommended Action and Implementation Plan at Appendix 3 which is used to record your acceptance of recommendations and action to be taken.

#### **AUDIT CONCLUSION & OPINION**

- 18. We have recommended a large number of improvements to existing systems which, if fully implemented, will provide assurance that major risks are being addressed.
- 19. In particular, data integrity must be improved so that reliance can be placed on information held on the various IND computer systems. Additionally, communication and co-operation between staff should be improved to develop procedures which are efficient and effective.
- 20. These issues remain relevant in the light of the recent announcements by the Secretary of State as they are fundamental to the success of any processes in place or introduced.

At present, we have concluded that the controls over NASS Cessations are inadequately controlled.

#### APPENDIX 1 DETAILED FINDINGS

Audit: NASS Cessations

Date: January 2002

Control Finding / Weakness	Risk	Category	Recommended Action
The Status Terminations Teams in Croydon, Liverpool and Leeds carry out cessation of NASS support. For this, they rely on lists taken from the ICD ACID system of decisions made and dispatched. The information on these lists is often incomplete e.g. no dispatch date is recorded, no NASS reference number is provided. It is also found that cases appear on the ACID list which do not require NASS cessation e.g. NASS support has been refused.	Applicants who have had a decision on their asylum appeal and should have their NASS support ceased may be missed. Delays in ceasing NASS support imply increased, unnecessary costs to NASS.	1	1. All users of A-CID should be made aware of the information which is required to be recorded on the system, and the purpose for which it is required. To ensure this, desk procedures should be produced and training should be undertaken.
Cessation of NASS support can only be undertaken when there is an outcome date on the ACID system, and for port cases, a dispatch date. A review of the ACID lists of granted cases from 11/10/01 and 15/10/01 revealed a large number of port cases where there was no dispatch date on the list. These cases have to be rejected as their support can not be ceased.	Delays in ceasing NASS support imply increased, unnecessary costs to NASS.	1	2. Details must be recorded onto A-CID as soon as they are known. This includes the outcome date and dispatch date.
The outcome date indicates when a decision on the case was reached whilst the dispatch date is the date a letter was sent to the asylum seeker regarding the outcome. The dispatch date should therefore be after the outcome date. In 6 cases of 40 examined, the dispatch date was before the outcome date.	Delays in ceasing NASS support.	1	3. ICD staff must ensure that the date of decision and date of dispatch are correctly recorded on A-CID.

Control Finding / Weakness	Risk	Category		Recommended Action
Further examination of 3 cases revealed that the Status Termination Team were unclear as to the date they should use to cease NASS support. Where the dispatch date is before the outcome date, these cases should be rejected and support not ceased. However, all three cases had their support ceased. In one case the dispatch date was used and in two cases the outcome date was used.	Inconsistencies in approach which could result in lack of compliance with regulations. Inaccurate calculation of overpayment of NASS support.	2	4.	Staff should be reminded of the procedures to cease NASS support and to use the dispatch date for this purpose. Where the dispatch date is before the outcome date, then the case should be rejected and support not terminated.
Because of the lack of data integrity on the ACID lists, there have been no cessations of support for applicants refused asylum, either with appeals rights exhausted or with no appeal since September 2001. Our estimate of the cost of continuing to support these cases is around £1 million per month for vouchers and accommodation. This is based upon: Vouchers: 1600 cases per month x £30 (estimate of support per week) x 4.33 (weeks in a month) = £200,000 Accommodation: 1600 cases per month x £600 (estimated cost per month) = £960,000.	Backlog of cases on which to cease support, leading to unnecessary increased cost of NASS support. Risk of absconds.	1	5.	Cessation of support for refused asylum cases should be resumed promptly.
For the last ACID list for which cessations of support for refused asylum cases were undertaken, 1,500 cases had their support ceased, of which over 90% of cases had to be reinstated. Similarly, the ACID list recording removals (for which support can cease) has also been found not to be robust. 30% of those recorded as removed had not in fact actually been removed.	Waste of resources. Poor publicity.	1	6.	Information on A-CID and hence on A-CID lists should be made more robust. Alternatively, NASS Termination staff should be sent a copy of the appeals decision letter so that they can cease NASS support.

Control Finding / Weakness	Risk	Category	Recommended Action
For cases recorded as refused and no appeal, when their support was ceased, it was often found that the applicant had in fact lodged an appeal, but it was not recorded on ACID. As such, these cases had to be restarted. Once an application has been ceased, it cannot be re- opened. Instead, a new, second application has to be made which is subject to passing through the whole process of registration, validation and assessment. This takes time and duplicates effort already made. A policy bulletin (69) recently introduced a procedure for changing a case from accommodation and subsistence to subsistence only. This should be looked at to see if it can be adapted to reinstate cases where support has been ceased.	Asylum seeker may become unnecessarily destitute. Poor publicity.	2	7. A procedure should be introduced whereby cases which have had their support ceased erroneously can be restarted based on their previous information.
ACID lists which are produced often have to be sorted before being passed to staff to cease support. This is because the lists include family cases, cases with no NASS reference where it has to be checked whether they are supported by NASS and other issues. This problem occurs because the asylum seeker has several reference numbers (NASS, Home Office, Port Reference) and also that family members do not	Time wasting. Delays in cessation of support.	2	8. If lists are to be produced from A-CID, care should be taken to ensure that only cases relevant to NASS are selected.
have individual reference numbers.		1	<ol> <li>The asylum seeker and their dependants should each be given one, unique reference which can be used by all bodies.</li> </ol>
Information on ASYS, the computer system used by NASS, can also be inaccurate. Cases sighted included an incorrect cessation and status of claims not being up to date.	Delays in the cessation of support. Poor publicity.	1	10. All users of ASYS should be made aware of the information which is required to be recorded on the system, and the purpose for which it is required. To ensure this, desk procedures

Control Finding / Weakness	Risk	Category	Recommended Action
	Delays in ceasing NASS		should be produced and training should be undertaken.
Delays can occur in the cessation of NASS support where asylum was claimed at port of entry. In these cases, when a decision on the case is reached, the paperwork is sent to the port for them to dispatch the decision to the Asylum seeker. Testing revealed that this can delay the dispatch by several months. For example, there were 2 cases with a port reference of Heathrow which had delays of 4 and 5 months respectively. Until the asylum decision is dispatched, NASS support cannot be terminated.	support. Increased costs to NASS.	1	11. The dispatch of an asylum decision relating to "entry at port" from the port should cease. Such cases should be dispatched by the caseworker responsible for the case, and not be required to be returned to the port for dispatch.
Cessations due to absconds are dealt with by a different NASS team. This team relies on the accommodation provider completing an abscond form and sending it in to NASS. There can be delays in receiving these forms because it is not in the accommodation provider's interests to complete them.	Delays in ceasing NASS support. Cost of accommodation.	2	12. In Leeds, copies of any IS absconder reports should be provided to NASS and used to cease support. The use of these reports should then be rolled out to use elsewhere.
Examination of details of a selection of 20 cases from the ACID list for granted cases revealed two cases where vouchers had been allocated after a positive decision had been reached on the claim. These applicants should not have received any vouchers.	Unnecessary cost to NASS.	1	13. Assessment and Allocation staff should review information on A-CID to ensure that a decision has not been reached before determining whether NASS support can be given.
	Asylum seeker remains in		

Control Finding / Weakness	Risk	Category	Recommended Action
Some applicants who have been refused asylum or leave to remain in the country are difficult to remove. There are barriers to removal which include the lack of travel documents, lack of safe passage etc. Countries where it is particularly difficult to obtain travel documents to allow the person to return to their home country include Iran and China.	the country. Poor use of resources.	2	14. Wherever possible, barriers to removal should be resolved. Where this is not possible, there should be a requirement that the applicant remains in regular contact with IND to ensure that they do not become untraceable. The planned reporting centres can be used for this purpose.
When NASS was introduced, it was added on to existing IS procedures. This means that the processes in operation are not designed with the whole system in mind. This is exacerbated by the number of different sections within NASS who each only deal with one part of the process. There is also a large amount of staff movement within IND which leads to a lack of accountability of staff. This is being partially addressed by the Integration Project which is looking at improving links and processes between cessations and removals. The Leeds Waterside Pilot has also shown how well staff within IND can work together.	Poor use of resources. Possible duplication. Inefficient systems resulting in increased costs.	2	15. Processes should be improved to ensure that the whole procedure flows, from the taking of the decision to the cessation of support and, where asylum is refused, removal of the applicant.
In addition, the list of measures recently announced by the Secretary of State should go some way to reducing the problems.		2	16. Staff should receive training to make them aware of the processes linking to those which they undertake.
There are accounts on ASYS for cases which are no longer active. For example, where asylum claims have been determined before the allocation of support. These may be at a certain stage e.g. "assessed". However, they will progress no further, and there is currently no mechanism by which to close these accounts down.	Unnecessary accounts on ASYS.	2	17. A procedure should be determined to identify cases which are no longer active and close them on ASYS. This could involve

Control Finding / Weakness	Risk	Category	Recommended Action
	Delays in the cessation of		producing lists of such cases and taking action to remove them from ASYS.
Problems were reported to be encountered with inaccurate or incomplete addresses recorded on the computer systems. If letters regarding decisions and cessation of support are sent to the incorrect address, they may be returned to sender. NASS addresses can only be changed by the Accommodation Reconciliation Team. Private addresses can be changed by the Change of Circumstances Team.	support resulting in increased costs to NASS.	2	18. Desk notes should be produced and staff should be trained to ensure that they enter address details correctly.
		2	19. When addresses are known to have changed, more staff should be able to change the address on the system and record a note to that effect.
The use of different computer systems by the various parts of IND increases the risk of errors such as inputting errors and misinterpretation of data. The systems do not interface well and staff do not have access/utilise all systems.	Inaccurate records leading to delays in the process and increased costs.	2	20. Staff should have access to the various computer systems available and should be given training as to the information they are likely to need to refer to/use.
		2	21. A review of IT Strategy should be undertaken with a view to developing a single computer system for use in all immigration/ asylum cases.
	Inconsistent approach.		

Control Finding / Weakness	Risk	Category	Recommended Action
Staff have no formal procedure notes to refer to. Processes undertaken are passed on verbally between staff members. With the large amount of movement of staff within IND, this can result in misunderstanding, inconsistencies of approach and breakdown in procedures.	Errors and incomplete/ inaccurate information on the system.	2	22. Formal written desk procedures should be introduced as a matter of urgency.

## **APPENDIX 2**

# DRAFT OBJECTIVES & SCOPE NASS: Review of the Management of Cessations

## SYSTEM OBJECTIVE

To ensure that when Asylum Seekers' support (vouchers/ accommodation plus vouchers) is ceased, the interfaces between NASS and other parts of the Home Office are adequate to ensure appropriate bodies are notified and the correct action is taken.

## AUDIT OBJECTIVE

To provide an assurance on the adequacy and effectiveness of the controls in place to ensure effective communications between the relevant parts of the Home Office to enable the efficient cessation of asylum seekers. To review the processes and procedures in place to deal all asylum seekers, including families, once a decision has been taken on their asylum application/ appeal and to ensure processes are in accordance with all applicable laws.

## SCOPE

This is one of six audits that will be carried out in NASS during this year. The other five audits will review dispersal accommodation, vouchers, arrivals, interim scheme and the performance inspection team.

The boundary of this review will be from the time a decision is taken on an asylum seeker's application or appeal until the asylum seeker's support is ceased and the relevant bodies notified of this. The scope will cover, but will not necessarily be restricted to:

a) communication of the application decision and/or appeal decision to the appropriate authorities and the asylum seekers

b) the processes for cessation of NASS support for asylum seekers

c) notification of the cessation of NASS support to the relevant bodies

d) the role of ASYS

e) the processes for dealing with families once a decision on their asylum application/appeal has been made.

## METHODOLOGY

The work will broadly follow a systems based process whereby systems are identified and documented, controls evaluated and tested. An audit report will be produced identifying strengths and recommending areas for improvements as appropriate.

There will be monthly meetings with the system owners to discuss progress and other issues throughout the period of all the reviews in NASS, arranged for first Monday in the month at 10

am in Voyager House, Croydon. We will also informally report key findings throughout the period of the review, usually at, but not limited to, the monthly meetings with the system owners.

## **REPORTING ARRANGEMENTS**

Our emerging findings from the review will be presented to NASS at the end of fieldwork.

#### **APPENDIX 3**

### **RECOMMENDED ACTION & IMPLEMENTATION PLAN**

#### Audit: CESSATIONS

#### Date: January 2002

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
1	1	All users of A-CID should be made aware of the information which is required to be recorded on the system, and the purpose for which it is required. To ensure this, desk procedures should be produced and training should be undertaken.	Accepted	Incorporated within the new user training for A-CID.	November 2001
2	1	Details must be recorded onto A-CID as soon as they are known. This includes the outcome date and dispatch date.	Accepted	Work ongoing to improve the automated data feeds into A-CID.	Ongoing
3	1	ICD staff must ensure that the date of decision and date of dispatch are correctly recorded on A-CID.	Accepted	Incorporated within the new user training for A- CID.	November 2001

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
4	2	Staff should be reminded of the procedures to cease NASS support and to use the dispatch date for this purpose. Where the dispatch date is before the outcome date, then the case should be rejected and support not terminated.	Accepted	This is done. Staff query anomolies with dispatch dates	December 2001
5	1	Cessation of support for refused asylum cases should be resumed promptly.	Accepted	Case Cleaning and Cessation Project has started identifying and ceasing cases at the end of the Appeals process. Staff are working from the HO file and updating A-CID data where necessary.	December 2001
6	1	Information on A-CID and hence on A- CID lists should be made more robust. Alternatively, NASS Termination staff should be sent a copy of the appeals decision letter so that they can cease NASS support.	Accepted	Case Cleaning and Cessation Project has been set up to address the poor quality of historic data on A-CID.	December 2001
7	2	A procedure should be introduced whereby cases which have had their support ceased erroneously can be restarted based on their previous information.	Partially accepted	Most restarts can be reopened whilst case is in termination, increasing the prescribed period will provide greater leeway. However if a case has gone beyond this time then there is no option other than to rollover on to a new application. This should not be changed as it risks corrupting data	February 2002 [Amendment to regulations concerning the prescribed period]

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
8	2	If lists are to be produced from A-CID, care should be taken to ensure that only cases relevant to NASS are selected.	Accepted	Work is ongoing to ensure A-CID has an accurate record of cases being supported by NASS. This will ensure NASS supported cases can be separately identified at the cessation stage.	Ongoing
9	1	The asylum seeker and their dependants should each be given one, unique reference which can be used by all bodies.	Accepted	In view of the size of the asylum seeker population this is an immense task but there are a number of current work streams (including the issueing of the ARC) that will help to improve this situation.	Ongoing
10	1	All users of ASYS should be made aware of the information which is required to be recorded on the system, and the purpose for which it is required. To ensure this, desk procedures should be produced and training should be undertaken.	Accepted	Weaknesses will be identified and retraining/re- inforce of guidance as necessary. To be done as general quality improvement.	31 March 2002

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
11	1	The dispatch of an asylum decision relating to "entry at port" from the port should cease. Such cases should be dispatched by the caseworker responsible for the case, and not be required to be returned to the port for dispatch.	Accepted	This problem has been overcome by the creation of the Asylum Decision Service Unit responsible for the service of port and other decisions requiring IS input. The Unit is based in Croydon and so allows all such decisions to be served quickly without the papers having to go back to the port.	Done
12	2	In Leeds, copies of any IS absconder reports should be provided to NASS and used to cease support. The use of these reports should then be rolled out to use elsewhere.	Accepted	Actioned	Done
13	1	Assessment and Allocation staff should review information on A-CID to ensure that a decision has not been reached before determining whether NASS support can be given.	Accepted	This has not been possible due to the absence of TBC in Quest House. Warehouse on Poise accounts have been set up but greater coverage is required. In the short term there are limitations on numbers of these. Longer term these will be widely available and caseworkers will be able to check A-CID before moving/ issuing SAPs etc. 93 NASS staff have, or have outstanding requests, for warehouse on POISE accounts	Mid 2002

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
14	2	Wherever possible, barriers to removal should be resolved. Where this is not possible, there should be a requirement that the applicant remains in regular contact with IND to ensure that they do not become untraceable. The planned reporting centres can be used for this purpose.	Accepted	Barriers to removal are being identified from the outset and are being resolved where possible. The Home Secretary has announced proposals for reform of the process which will involve much closer contact management, including the use of a smart card to reduce fraud, the introduction of accommodation centres to assist contact management and an enhanced reporting system, involving reporting centres, Outreach teams and mobile reporting teams.	Ongoing
15	2	Processes should be improved to ensure that the whole procedure flows, from the taking of the decision to the cessation of support and, where asylum is refused, removal of the applicant.	Accepted	The process improvements mentioned at item 14 above also apply here. IND is working with PA Consultants to develop and map processes for the new initiatives announced by the Home Secretary which aim to create a seamless asylum process from initial application through to decision, appeal, integration or removal. The need to ensure prompt cessation of support when necessary throughout that process is a key feature of that work.	Ongoing

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
16	2	Staff should receive training to make them aware of the processes linking to those which they undertake.	Accepted	A wide review of the asylum process and changes following the white paper is in place and from this will flow the material to be used to give wider understanding of all of the end to end process.	March 2003
17	2	A procedure should be determined to identify cases which are no longer active and close them on ASYS. This could involve producing lists of such cases and taking action to remove them from ASYS.	Accepted	Archiving ASYS has not been a priority - operational improvements are more important. Furthermore old data provides useful management information. This will require an ASYS enhancement and is currently low priority	Mid 2002
18	2	Desk notes should be produced and staff should be trained to ensure that they enter address details correctly.	Accepted	Desk notes are available but require more formal structure. Will be actioned as part quality assurance project.	Mid 2002
19	2	When addresses are known to have changed, more staff should be able to change the address on the system and record a note to that effect.	Rejected	Addresses and address changes are tightly controlled for a good reason. Increasing the numbers that do it risks corrupting the database again. This risk is too high given the problems experienced before and the effort required to put it right.	N/A

Action Point No.	Categor y (see Key)	Action Point	Accepted/ Rejected	Management Response	Implementation Target Date
20	2	Staff should have access to the various computer systems available and should be given training as to the information they are likely to need to refer to/use.	Accepted	Within ICD the Cessation Teams are co-located allowing staff to have access to both A-CID and ASYS as well as an overview of all systems through Warehouse.	November 2001
21	2	A review of IT Strategy should be undertaken with a view to developing a single computer system for use in all immigration/ asylum cases.	Accepted	A single IT system would be an ideal solution but not practical in the short to medium term. A number of activities are under way to ensure that links between current systems improve and that access to essential systems is made wider.	Ongoing
22	2	Formal written desk procedures should be introduced as a matter of urgency.	Accepted	There are instructions in the policy bulletins, but there is work aid compiled within the cessations team. The instructions in relation to cessations are constantly reviewed in line with changes in policy.	March 2002