



Home Office

**The Home Office response to the Independent Chief Inspector's reports:**

**An inspection of the visa section in Dhaka April – July 2013**

**A short-notice inspection of decision making quality in the Warsaw visa section September 2013**

The Home Office thanks the Independent Chief Inspector (ICI) for advance sight of his reports and is pleased to note the positive findings made in both. The ICI recognises the strong performance in risk management in Dhaka along with good management of data and information security. In Warsaw, the ICI acknowledges successes in relation to both the treatment of protected data and information security, and the implementation of previous recommendations on the retention of documentation.

UK Visas and Immigration (UKVI) is committed to providing excellent customer service and the reports record that both visa sections are consistently meeting their customer service standards.

The Home Office has have made steps to implement processes to address the ICI's concerns, some of which have been raised previously, but accept that there is further work to do in applying them consistently. The Home Office recognises the need for continuous improvement in the way it assures the quality of its decisions, and looks forward to continuing to work closely with the ICI as part of a wider programme of improvements.

### **The Home Office response to the 5 recommendations made in the Dhaka report:**

#### **1. Ensures staff record clear grounds for entry clearance decisions on Proviso.**

##### **1.1 Accepted and already implemented.**

1.2 This need had already been identified prior to the ICI inspection and was being implemented. Further reminders were also issued to entry clearance officers (ECOs) on 21 July. This was a relatively recent initiative and some of the cases checked had less complete notes than those being recorded now.

1.3 This initiative was recorded on Post's continuous improvement (CI) log, a copy of which had been sent to the ICI team prior to their inspection.

#### **2. Adopts a consistent approach to the retention of relevant supporting documents to support effective decision making.**

##### **2.1 Accepted and already implemented.**

2.2 This need had already been identified and addressed prior to the ICI inspection. As above, as this was a relatively recent initiative and some of the cases checked had less complete notes than those being recorded now.

2.3 This initiative was recorded on Post's continuous improvement (CI) log, a copy of which had been sent to the ICI team prior to their inspection. The ICI team were also briefed on this matter during their visit.

**3. Implements robust assurance mechanisms to provide better governance and assurance to senior managers about the quality of visa decisions.**

**3.1 Accepted and implemented in part.**

3.2 A number of quality assurance mechanisms are already in place with Dhaka undergoing an annual independent Post Inspection and moving to a process, acknowledged in the report, where entry clearance managers (ECMs) review decisions on a risk basis to improve the quality of reviews at this grade.

3.3 UKVI will also be training all ECMs to improve the review process while also developing central capabilities within its own quality assurance work-stream to further strengthen its decision quality oversight and review process. The ICI will provide assistance with the training process.

**4. Ensures that Entry Clearance Officers (ECOs):**

- **Do not refuse entry clearance on credibility grounds which an applicant has not had the opportunity to respond to during interview and;**
- **Receive adequate training to determine whether an applicant's English language ability is in line with that specified in the certificate of acceptance for studies (CAS).**

**4.1 Accepted and being implemented.**

4.2 All relevant staff in Dhaka received further interview training in September 2013.

4.3 The training referred to in the second bullet point has been arranged on several occasions with the British Council but had to be postponed due to the current security situation in Dhaka and other civil unrest. Our intention is to complete the training before the end of the year subject to the security situation in Dhaka.

**5. Extends its analysis of appeal determinations to include cases reviewed and overturned by Entry Clearance Managers; ensuring a focus on the quality of decisions to identify trends of common errors and training needs.**

**5.1 Accepted and being implemented.**

5.2 The appeals analysis was instigated in Dhaka to focus on decision quality and trends. The majority of analysis related to appeal determinations and account was taken of ECM reviews. However, the analysis report did not specifically highlight cases reviewed and overturned at ECM review stage. We will now ensure that the analysis does bring out more clearly cases reviewed and overturned by ECMs in line with this recommendation.

**The Home Office response to the 5 recommendations made in the Warsaw short notice report:**

- 1. Ensures that more effective quality assurance of ECO decision making is conducted in Warsaw in order to improve initial decisions on applications.**
  - 1.1 Accepted and already implemented.**
  - 1.2 A number of additional quality assurance mechanisms have recently been put in place in Warsaw. These include ECMs increasing the number of reviews of decisions, which are now meeting guideline levels; additional dip sampling of decisions by the regional operations manager (ROM); analysis of allowed appeals and ECM review outcomes, shared with decision makers individually and at staff meetings; and further training for ECOs in refusal notices, interviewing and credibility testing.
  - 1.3 The six refusal decisions where the Chief Inspector found decision making to be 'seriously flawed' have now been reviewed. Three decisions were upheld, but refusal notices were redrafted and reissued.
  - 1.4 In the remaining three cases applicants were asked to supply further information to support their applications. In one, the refusal decision was subsequently maintained after additional investigation. In the second the applicant asked UKVI to defer reconsideration until he next plans to travel to the UK. We await further evidence in the third case.
- 2. Reviews and revises the ECO target for Other Visitor applications in Warsaw in order to improve the quality of decisions.**
  - 2.1 Accepted in part.**
  - 2.2 ECO targets were last reviewed in the Warsaw visa section in June 2013. ECOs were consulted on these benchmarks, and they are regularly exceeded.
  - 2.3 The Warsaw visa section reviews ECO benchmarks every six months in line with guidance and will consider the benchmarks again in December 2013 in accordance with the current schedule. In doing so it will consider whether it is necessary to revise benchmarks, including by introducing category-specific targets, taking account of any impact from the introduction of enhanced risk-based verification processes in the visa section.
- 3. Implements a process to provide management assurance that risk based verification checks are conducted in all appropriate cases.**
  - 3.1 Accepted and already implemented.**

- 3.2 In November new processes were introduced in Warsaw to improve the streaming of applications for appropriate risk based verification checks. All staff have now been trained, and a dedicated document verification unit has been created in the visa section.
- 3.3 Whilst these processes become established, Risk and Liaison Officer Network (RALON) managers are reviewing all verifications. To provide ongoing management assurance that risk based verification checks are conducted in all appropriate cases RALON will, when satisfied that the processes are working as intended, continue to undertake quality control checks at a reduced level of 10%.
- 4. Reviews the risk profile in conjunction with refusal rates to determine whether it accurately reflects the most significant risks and amends it in the light of that review.**
- 4.1 Accepted and already implemented.**
- 4.2 RALON has reviewed the risk profile in use in Warsaw and updated it to reflect the latest evidence on adverse outcomes linked to visa applications. The updated risk profile will be used in conjunction with enhanced verification processes to continue to improve decision making.
- 5. Ensures decision makers use the risk profile and that the scope of this is targeted to provide a meaningful aid to decision making.**
- 5.1 Accepted and already implemented.**
- 5.2 ECOs in Warsaw use the risk profile to inform the decision making process and receive training on the profile, and a RALON briefing, during their induction.
- 5.3 RALON has recently updated the risk profile and all staff have received appropriate training. It will regularly review the profile in response to feedback from ECOs and the latest evidence of risk to ensure it continues to support decision making.
- 5.4. RALON and visa staff regularly discuss the profile and review current and emerging risks at weekly meetings. Ongoing dip sampling of verifications by RALON managers, alongside the ECM review process, will provide additional assurance that the risk profile is being used by ECOs to improve decision quality.