



An Unannounced Inspection of the Service Provided by Glasgow Public Enquiry Office

December 2013



John Vine CBE QPM

Independent Chief Inspector of Borders and Immigration



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Any enquiries regarding this publication should be sent to us at

Independent Chief Inspector of Borders and Immigration,
5th Floor,
Globe House,
89 Eccleston Square,
London, SW1V 1PN.

Email: chiefinspector@icinspector.gsi.gov.uk

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Our Purpose

We provide independent scrutiny of the UK's border and immigration functions, to improve their efficiency and effectiveness.

Our Vision

To drive improvement within the UK's border and immigration functions, to ensure they deliver fair, consistent and respectful services.

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Foreword from John Vine CBE QPM

Independent Chief Inspector of Borders and Immigration



Public Enquiry Offices in the United Kingdom offer a 'premium' same-day service for certain categories of applicants who want to either extend their leave or settle permanently in the United Kingdom. Applicants must attend a PEO and will usually receive a decision the same day.

Customer service provision at Glasgow PEO was good, as demonstrated by consistent feedback from customer surveys and my own observations on the day of inspection. Staff were committed and understood the importance of delivering a professional service.

However, as with other recent inspections, I found an absence of management assurance to provide confidence that the decisions being made were reasonable. This is not acceptable and the Home Office must do more to provide assurance that decisions relating to extensions of leave or permanent residence are made in accordance with the Immigration Rules, policy and guidance.

I also found that the introduction of a new working model had been poorly implemented. This had led to a deterioration in performance in relation to the same-day service and saw some applicants not receiving the level of service they had paid for.

Staff were adversely affected by this change, either because resources were not aligned correctly to deliver an efficient and effective service or because they had not been fully trained to undertake new responsibilities. This had resulted in some applicants waiting many months for a decision, even though it had been decided that their applications would be refused.

In conclusion, I found that customer service had suffered following the introduction of this new operating model. However, it did eliminate the former practice of rejecting applications which should have been refused, which was a positive step forward.

I have made five recommendations for improvement.

A handwritten signature in black ink that reads "John Vine".

John Vine CBE QPM
Independent Chief Inspector of Borders and Immigration

1 - Executive Summary

- 1.1 This unannounced inspection examined the premium services provided to applicants by the Glasgow Public Enquiry Office (PEO). It assessed whether they were delivered efficiently and effectively, with the customer at the heart of service provision.

Positive findings

- 1.2 Feedback from applicants collected between January and September 2013 was consistently positive about the service they had received. Although the accommodation was due to be refurbished, we found the public areas clean and adequate for their purpose.

Feedback from applicants collected between January and September 2013 was consistently positive about the service they had received

- 1.3 The online appointment booking system was a quick and efficient means of booking an appointment and there was usually an available appointment within a few days. Staff were committed to providing a good service to applicants and performance against the same-day service standard was good up until August 2013.

Areas for improvement

- 1.4 The introduction of a new operating model in August 2013 was designed to standardise in-country services across PEOs, improving accountability and enhancing the delivery of premium services. However, this organisational change was implemented poorly at Glasgow PEO and resulted in deterioration in the service provided to applicants, who had paid for and expected to receive a same-day service.

Organisational change was implemented poorly at Glasgow PEO and resulted in deterioration in the service provided to applicants

- 1.5 The principal cause of the poorer performance was the change in roles and responsibilities that the new operating model introduced. This saw Executive Officers (EO) and Administrative Officers switching roles and responsibilities and required EOs to decide applications and draft decision letters. However, EO resources were insufficient to meet the requirements that were placed on them.
- 1.6 A change in the payment method around the same time as the introduction of the new operating model also exacerbated problems, primarily because staff were required to draft and serve refusal notices. Surprisingly, prior to the introduction of the new online payment system, where an application did not meet the requirements of the Immigration Rules staff simply told applicants that they should 'review' their application and consider applying by post. In such cases, although the application had been considered, the fee was not taken.
- 1.7 However, once online payment was introduced, staff were required to process refusals, but had not been fully trained to do so. This had led to a small backlog of applications (14) which needed to be refused, some of which had been submitted months previously.

- 1.8 We also found examples of applications that were decided during this period without caseworking notes explaining the rationale for the decision. This has been a recurring issue in our inspections of UK Visas & Immigration (UKVI) business areas.
- 1.9 During this period of significant change, no quality assurance of decisions took place at Glasgow PEO. We would have expected quality assurance to have been given greater priority during such a period of change.
- 1.10 UKVI's website should be improved to remove confusing and contradictory information concerning service standards applicable to Premium Services. This was disappointing, given that we made a similar finding in 2010 following our inspection of Croydon PEO.
- 1.11 The telephone appointment booking process for family groups of 12 or more needed to be improved. There was no published service standard for telephone response times. Applicants were simply required to telephone the general immigration enquiry line, which did not provide information about call charges or likely waiting times.
- 1.12 UKVI needs to ensure that complaints information is prominently displayed in public areas. It also needs to ensure that staff understand the complaints handling process and are able to explain it to applicants.

During this period of significant change, no quality assurance of decisions took place at Glasgow PEO

2 - Summary Of Recommendations

We recommend that the Home Office:

1. Sets minimum acceptable levels of quality assurance checks and ensures that they are conducted across the PEO network.
2. Ensures that there are adequate notes on the casework database about the rationale for decisions, including any reasons for delay and the outcome of any enquiries made.
3. Publishes clear customer service standards in respect of Premium Services and removes any conflicting or ambiguous information from its website.
4. Provides up-to-date information about the complaints process at PEOs, with complaint posters and leaflets being available in public areas and ensures that staff understand the process and can explain it to applicants.
5. Sets an appropriate and measurable standard for answering telephone calls to its immigration enquiry line and publishes this on its website.

3. The Inspection

Purpose and aim

- 3.1 The purpose of this inspection was to examine the services provided to applicants by the PEO in Glasgow, to assess whether they were delivered efficiently and effectively, with the customer at the heart of service provision. Being customer-focussed means:
- ensuring that people can access services easily;
 - informing applicants what they can expect and what the public body expects of them;
 - keeping to commitments, including any published service standards;
 - dealing with people helpfully, promptly and sensitively, bearing in mind their individual circumstances; and
 - responding flexibly to customer needs.

Background

- 3.2 UKVI offers a premium (same-day) service to non-European nationals making straightforward applications to settle in the UK or to those applicants in certain categories¹ wishing to extend their stay in the UK. There are seven PEOs² in the UK which offer this premium service.
- 3.3 The premium service attracts higher application fees than applications submitted by post. Appointments must be made online. The only exception to the requirement to make an appointment online is for an application involving a family group of 12 or more persons, which must be made by telephone. For settlement applications the appointment must be at least two working days after the applicant has passed a 'Life in the UK' test.³
- 3.4 Figure 1 sets out the online application process to be followed by users of UKVI's premium service.

1 The types of application that can be made using the premium service can be found here: <http://www.ukba.homeoffice.gov.uk/aboutus/contact/applyinginperson/>

2 Belfast, Cardiff, Croydon, Glasgow, Liverpool, Sheffield and Solihull.

3 The Life in the United Kingdom test is a computer-based test constituting one of the requirements for anyone seeking Indefinite Leave to Remain in the UK or naturalisation as a British citizen.

Figure 1: UKVI Premium Service – Application Process

1. Applicant registers online to use the premium service by creating a customer account.⁴
2. Applicant receives a password by email which allows access to their customer account, enabling them to book an appointment.⁵
3. Applicant books an appointment online to attend the PEO and pays the application fee.⁶
4. Applicant is issued with an electronic payment sheet which must be taken to the appointment.
5. Applicant attends the PEO with their completed application form, supporting documents and payment sheet.
6. At the PEO the applicant undergoes security screening, pays the application fee (if not paid in advance), submits the application⁷ and provides biometric information.⁸
7. The application is considered and the applicant is issued with a decision notice on the same day.⁹
8. Successful applicants are issued with a Biometric Residence Permit within 7 to 10 working days of the date of decision.

Glasgow PEO

3.5 Glasgow PEO is situated at Festival Court and typically deals with up to 30 applicants per day. However, a recruitment and refurbishment programme was underway to improve capacity and capability. For 2013/14 the PEO had an income generation target of £7.7m. Figure 2 shows the number of applications handled by Glasgow PEO between December 2012 and November 2013.

Figure 2: Glasgow PEO applications Dec 2012 to Nov 2013

December 2012	387
January 2013	451
February 2013	468
March 2013	418
April 2013	392
May 2013	288
June 2013	316
July 2013	426
August 2013	319
September 2013	375
October 2013	471
November 2013	381
Total	4692

Note: Data provided by UKVI.

4 A valid email address is required to create a customer account.

5 The chosen appointment date must be before the expiry of current permission to remain or visa.

6 For most applications the application fee must be paid online when the appointment is booked. If not paid in advance, the application fee must be paid when the applicant attends the PEO.

7 The applicant may be interviewed or asked to clarify certain details at the discretion of the caseworker considering the application.

8 Fingerprints, signature and current photograph.

9 UKVI's website suggests that case consideration should take 60 to 90 minutes but could take longer for applicants with dependents.

Staffing

3.6 Figure 3 provides the number of staff in post at Glasgow PEO at the time of our inspection.

Figure 3: Staffing Numbers at Glasgow PEO	
Acting Senior Operations Manager / Senior Caseworker (Senior Executive Officer)	1
Operations / Workflow Manager (Higher Executive Officer)	1
Caseworker (Executive Officer)	6*
Assistant Caseworker (Administrative Officer)	7
Total	15

*This figure includes one member of staff on long-term sick absence and three acting Executive Officers.

3.7 In April 2011 all seven PEOs were awarded Customer Service Excellence Accreditation following an assessment of the services offered, with a particular focus on delivery, timeliness, information, professionalism and staff attitudes.

Methodology

3.8 The inspection was devised using four of the Chief Inspector's core inspection criteria.¹⁰ These are grouped under the headings of Operational Delivery and Safeguarding Individuals and are listed at Annex B. The scope of the inspection was confined to an assessment of the customer service experienced by users of Glasgow PEO and a review of the findings and recommendations we made in a previous inspection¹¹ concerning the level of customer service provided by the Croydon PEO.

3.9 Prior to the on-site phase of the inspection, we reviewed the information that UKVI made available to applicants through its website and conducted a 'mystery shopper' exercise of the online and telephone appointment booking system.

3.10 The on-site phase of the inspection took place on 11 December 2013. We arrived at the PEO in Glasgow at 08:30am, and announced our presence to the senior manager on site. There was no warning in advance of our inspection. Whilst at Glasgow PEO we:

- conducted a walkthrough to gain an understanding of the end-to-end process;
- carried out interviews and focus groups with staff and managers;
- examined the accommodation and facilities provided for applicants;
- observed PEO processes, including security screening, biometric capture, case consideration and dispatch; and
- surveyed applicants; seeking their feedback with regard to the following areas:
 - ease of the online booking system and the provision of easily accessible information on the UKVI website;
 - courtesy and professionalism of staff; and
 - suitability of the accommodation.

3.11 We also took account of the results of UKVI's customer satisfaction surveys, conducted on a monthly basis between January and September 2013.

¹⁰ <http://icinspector.independent.gov.uk/wp-content/>

¹¹ <http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Unannounced-inspection-Croydon.pdf>

3.12 Figure 4 provides a breakdown of the staff we interviewed by grade.

Figure 4: UK Visas and Immigration staff interviewed	
Grade	Number of staff
Administrative Officer (AO)	2
Executive Officer (EO)	2
Higher Executive Officer (HEO)	1
Assistant Director / Grade 7	1
Deputy Director / Grade 6	1
Total	7

3.13 Following the on-site activity, we requested and subsequently reviewed management information produced to us by UKVI. On 19 December 2012 we presented UKVI with high-level emerging findings. The inspection identified five recommendations for improvement, which are set out at page six of this report.

3.14 This report was submitted to the Home Secretary on **17 February 2014**.

4. Inspection Findings – Operational Delivery

Resources should be allocated to support operational delivery and achieve value for money.

- 4.1 Glasgow PEO staff were multi-skilled and this gave managers some flexibility to reallocate staff resources to meet fluctuating customer demand or manage resource issues. Managers from the six regional PEOs took part in a weekly conference call with the regional manager. This allowed work to be reallocated between PEOs to manage peaks and troughs in demand. Additionally, plans were being developed to allow PEOs to take on additional work from others part of UKVI, for example postal applications.

Appointment booking

- 4.2 We conducted a mystery shopper exercise to test the online and telephone appointment booking systems and to determine the ease with which potential applicants could access a suitable appointment at Glasgow PEO. We undertook this exercise between 28 November and 6 December 2013. In relation to the online system, we found that, on average, appointments were available for single applicants within two days. At certain times appointments were available the following day and the longest wait did not exceed three days. This was a good performance.

On average, appointments were available for single applicants within two days. At certain times appointments were available the following day and the longest wait did not exceed three days. This was a good performance

- 4.3 For an applicant with two minor dependents, the average wait for an appointment was four days, although in some cases the waiting time was seven days. Although these were longer waiting times, this was still a good level of service.
- 4.4 Applicants making an application as part of a family group of 12 or more had to use the telephone booking system. This required them to call the immigration general enquiry line using a 0870 premium rate number. We found that the call was likely to be answered more quickly in the morning than in the afternoon, with average call waiting times of three minutes (with a range between one and six minutes) and seven minutes (with a range of three to 11 minutes) respectively. This level of service fell far short of industry best practice, where 80% of telephone calls were answered within 20 seconds.¹²
- 4.5 UKVI told us that its service standard for the call centre was for 80% of calls to be answered by its agent. In 2013-14 only 39% of calls to this line were answered,¹³ which is a very poor performance. Neither the very modest target nor the performance against it did anything to promote Premium Services which represents an important income stream for UKVI.

¹² <http://www.nao.org.uk/wp-content/uploads/2013/07/10202-001-Customer-telephone-lines.pdf>

¹³ <http://www.nao.org.uk/wp-content/uploads/2013/07/10202-001-Customer-telephone-lines.pdf>

- 4.6 We noted that the first minute of every call was an automated information message but it gave no details of call charges or of likely waiting times. Seven minutes is a long time to wait for a reply on a premium rate number, particularly where the caller has no idea of the likely cost and where there is no indication as to when the call will be answered.
- 4.7 The House of Commons Public Accounts Committee recently recommended¹⁴ that access to low-cost alternatives to high-rate numbers should be provided for callers accessing public services. It also recommended that callers should be informed of the costs involved.
- 4.8 The Customer Service Excellence Standard¹⁵ suggests that best practice in this area requires an organisation to set appropriate and measurable standards for the timeliness of response for all forms of customer contact including telephone calls.

We recommend that the Home Office:

Sets an appropriate and measurable standard for answering telephone calls to its immigration enquiry line and publishes this on its website.

Service standards

- 4.9 On the section of its website devoted to the premium service,¹⁶ UKVI stated that it aimed to decide applications submitted in person on the same day as they were submitted. However, elsewhere on the website different PEO service standards were referred to. For example, the service standard for:
- settlement¹⁷ and domestic workers¹⁸ applications was to decide 90% of applications on the same day;
 - skilled worker applications under Tier 2 of the Points-based System was to decide most cases on the same day; and
 - the Premium Service was to decide 95% of applications on the same day.¹⁹
- 4.10 Although the information provided to the public was confusing, UKVI told us that for all application types its service standard was to decide 90% of premium service applications the same day.
- 4.11 We were told that where the service standard was not met, e.g. because of an IT failure, the difference between the cost of the premium and standard service (£375) was refunded to the applicant. However, where the delay was due to the complexity of the application, no refund was given, although the applicant would be advised that the case would not be decided the same day.
- 4.12 In our view, a single service standard such as ‘90% of applications will be decided the same day’ is problematic, because it provides no incentive to staff to progress further applications which have not been decided within the service standard. It could be argued that to work on an application which has already missed the service standard diverts resources from other applications approaching the service standard deadline and thereby risks damaging performance.
- 4.13 This approach was inconsistent with UKVI’s layered service standards in use in its international operations. For example, its service standards for visitor visas are that it will decide 90% of applications within 3 weeks, 98% within 6 weeks and 100% within 12 weeks.

14 <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmpubacc/617/617.pdf>

15 <http://www.customerserviceexcellence.uk.com/RAD1763%20Standards%20Brochure.pdf>

16 <http://www.ukba.homeoffice.gov.uk/aboutus/contact/applyinginperson/>

17 <http://www.ukba.homeoffice.gov.uk/visas-immigration/settlement/waitingtimes/>

18 <http://www.ukba.homeoffice.gov.uk/visas-immigration/working/othercategories/domesticworkers/extending/waiting-times/>

19 <http://www.ukba.homeoffice.gov.uk/sitecontent/documents/aboutus/percentage-of-migration/>

4.14 It was not clear to potential applicants what UKVI's service standard or standards were for its premium service. An applicant making an application in person should be able to access information about the service standard which UKVI applies to the relevant application category, as well as an indication as to the performance of UKVI in meeting its service standard.

It was not clear to potential applicants what UKVI's service standard or standards were for its premium service

4.15 We made a similar point in our Croydon PEO inspection report and it is disappointing that over three years later there was still confusing and conflicting information on the website.²⁰ We were subsequently informed that since 1 January 2014 UKVI has been trialling a new service standard for PEOs requiring 98.5% of workable cases²¹ to be completed on the same day. We were told that this will be published on the website from 1 April 2014.

We recommend that the Home Office:

Publishes clear customer service standards in respect of Premium Services and removes any conflicting or ambiguous information from its website.

Performance against service standard

4.16 Although the vast majority of applications submitted in person at Glasgow PEO were decided on the same day, some applications took much longer, with little or no progress being made to bring them to a resolution. Forty-four such cases were being held in a Work in Progress (WIP) hold at the time of our inspection. These applications ranged from one day old to over six months old. Figure 5 provides details of a such a case:

Figure 5: Case study – Application for Indefinite Leave to Remain

The applicant:

- submitted an application in person at Glasgow PEO for Indefinite Leave to Remain (ILR) on 22 May 2013;
- sought an update a month later on 24 June 2013;
- made three further enquiries via her MP in November and December 2013;
- was granted ILR on 12 December 2013, two days after the inspection and nearly seven months after the application was submitted.

UK Visas and Immigration:

- entered a note on its caseworking database indicating a suspicion that the applicant had tendered a false P60;
- made no further entries on its casework database to indicate what action it was taking about the suspected false document;
- granted ILR on 12 December 2013 with no reference on its caseworking database as to why its suspicions had been allayed.

²⁰ <http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Unannounced-inspection-Croydon.pdf>

²¹ A workable case is defined by UKVI as one where all required information is available on the day.

Chief Inspector's comments:

- This example concerned an applicant who applied for ILR using UKVI's same-day service yet waited over seven months for a decision.
- It should have been possible to track the progress of the case and to discern the reason why UKVI's initial suspicions were allayed, using UKVI's caseworking database.

4.17 In previous inspection reports we have emphasised the need for UKVI to record reasons for its decisions. The same requirement applies to decisions made in the UK, if the decision-making progress is not to appear arbitrary and lacking in transparency.

We recommend that the Home Office:

Ensures that there are adequate notes on the casework database about the rationale for decisions, including any reasons for delay and the outcome of any enquiries made.

4.18 We also established that there were 14 cases in the WIP where it had been decided that the application should be refused, with the original application dates being made between one and five months earlier. Figure 6 provides details of one such application.

Figure 6: Case study – Refusal WIP**The applicant:**

- submitted an application in person at Glasgow PEO for ILR as a spouse of a person settled in the UK on 30 July 2013;
- was still awaiting a decision on the application as at 20 January 2014.

UK Visas and Immigration:

- entered a note on its caseworking database on the day of the application to indicate that the applicant had failed to provide evidence of having passed a Life in the UK test or English Language test in the previous two years;
- entered a note on its database on 24 August 2013 indicating that the application should be refused.

Chief Inspector's comments:

- This applicant has been waiting for their application to be decided for six months, despite UKVI deciding five months ago that the application should be refused.
- This was an unacceptable delay, particularly given the very straightforward reason for the refusal.

4.19 This situation had arisen for two reasons. Firstly, it was decided to discontinue the practice of rejecting applications which were likely to be refused, because senior managers believed that this approach undermined customer service and immigration control.

4.20 The introduction of online fees in August 2013 also saw applicants paying the application fee in advance of attending the PEO, which meant that staff could no longer allow applicants to withdraw their application if it was likely to be refused, with no fee being taken – this approach meant that there was no need for staff to be trained to draft and serve refusal notices. However, once the new

payment model was introduced and fees were taken in advance of attendance at the PEO, there was no alternative other than to grant or refuse an application, even though staff had not been fully trained to undertake refusal casework.

4.21 Although a number of staff had received refusal training prior to this change, it was not consolidated with mentoring and practical experience. As a result, staff did not feel confident in dealing with refusals casework. This was compounded by the work pressures that followed the introduction of the new operating model, which saw refusal decisions only being made in two cases (we deal with the introduction of this new operating model in greater detail in the next section).

*Staff did not
feel confident
in dealing with
refusals casework*

4.22 It is clear that, under either model, staff must be trained to serve refusals. Applicants pay a fee for their application to be considered whether the final decision is to grant or refuse. It is hard to understand why Glasgow PEO operated in the way it did prior to August 2013. The new payment model corrected this anomaly, but it is disappointing that it was introduced before sufficient staff were suitably trained.

4.23 The outstanding refusals should be dealt with as soon as possible and if necessary the weekly resourcing conference call should be used to reallocate the work around the network.

New operating model

4.24 In the summer of 2013 UKVI introduced a new operating model into PEOs, which was designed to enhance the delivery of premium services by:

- strengthening management;
- improving accountability;
- standardising in-country services; and
- removing non-value added services.

4.25 A part of this change entailed Administrative Officers (AOs) fulfilling the public facing role, conducting necessary checks, entering the application on the IT casework system and collecting biometric data etc, before passing the application to an Executive Officer (EO) to make a decision to either grant or refuse the application.

4.26 Previously these roles were reversed, with EOs dealing directly with applicants at the public counter, conducting the necessary checks and sifting applications before passing the application to AOs in the back office to process a grant decision. This change aligned decision-making within PEOs more closely with UKVI's international operations, where the decision-making function was performed by EO grade Entry Clearance Officers, with AO grade Entry Clearance Assistants conducting preparatory checks.

4.27 To assess the impact of this new operating model, we examined UKVI's performance against its '90% same-day' service standard for applications made at Glasgow PEO between December 2012 and November 2013 - Figure 7 refers.

Figure 7: Glasgow PEO applications Dec 2012 to Nov 2013*

Month	No of applications	Number meeting service standard	Number not meeting service standard
December 2012	387	369 (95%)	18 (5%)
January 2013	451	440 (98%)	11 (2%)
February 2013	468	424 (91%)	44 (9%)
March 2013	418	392 (94%)	26 (6%)
April 2013	392	370 (94%)	22 (6%)
May 2013	288	273 (95%)	15 (5%)
June 2013	316	286 (91%)	30 (9%)
July 2013	426	394 (92%)	32 (8%)
August 2013	319	275 (86%)	44 (14%)
September 2013	375	267 (71%)	108 (29%)
October 2013	471	416 (88%)	55 (12%)
November 2013	381	278 (73%)	103 (27%)
Total	4692	4184 (89%)	508 (11%)

Note: *Data provided by UKVI

- 4.28 As can be seen, UKVI met its service standard in every month between December 2012 and July 2013. However, in the following months it failed to meet this standard, missing it by a wide margin in September and November. Staff told us that the drop in performance was directly linked to the introduction of the new operating model in August 2013. Managers considered that the deterioration in performance was a temporary consequence of resource constraints, coupled with wider process changes, including the need to deal with refusal cases.
- 4.29 Existing EOs did not feel that they had received sufficient training to carry out their new role. They said that, even though application numbers had fallen, managers had been authorising the use of overtime to manage applications. We were told that this was never necessary under the old operating model. Staff were of the opinion that there were insufficient EOs available to meet demand. For this reason, three of the AOs had been temporarily promoted to boost the number of EO caseworkers.
- 4.30 Senior managers informed us that plans were in place for additional staff to improve resilience in line with the roll-out of the new operating model, which required three casework teams made up of 12/13 staff, led by a Senior Executive Officer. The three teams will be made up of five AO assistant caseworkers, six or seven EO caseworkers and a HEO Team Leader/Workflow/Operations manager, supported by one HEO senior caseworker.
- 4.31 This will increase staffing in Glasgow from the current 15 staff to 30. Managers informed us that this will standardise the regional PEO structure and grade mix and facilitate expansion of opening hours to include Saturdays, giving customers greater choice. This had not been successfully communicated to existing staff, as none of those we spoke to understood why such a significant uplift in staffing was required given the current demand for Premium Services.

None of those we spoke to understood why such a significant uplift in staffing was required given the current demand for Premium Services

4.32 Staff believed that the problems they experienced were entirely foreseeable and had been flagged up to managers. Staff considered that their concerns were either ignored or considered to be evidence of resistance to change. Senior managers did not recognise this description of the change management process. They said that considerable consultation had taken place with staff in Glasgow, who had been resistant to the new way of working. They added that the timing of the introduction of the new operating model was driven by several factors, including the need:

- to address the risk to immigration control and negative customer service outcomes caused by the ‘sifting-out’ of complex cases and refusals;
- for consistency between PEOs; and
- to address appointment harvesting²² by the introduction of a new payment system.

4.33 It was clear that the new operating model had resulted in a significant decrease in performance at Glasgow PEO. It is not clear why UKVI introduced its new operational model in Glasgow before it had recruited and trained the correct numbers of staff in the appropriate roles to make it work. The danger of not having a sufficient number of trained staff in place to deliver under the new model even figured on its risk register.

It was clear that the new operating model had resulted in a significant decrease in performance at Glasgow PEO

4.34 The lack of preparation meant that the organisational change was poorly implemented and had contributed to a deterioration in the service provided to customers at Glasgow PEO. It is now vital that UKVI completes its recruitment and training programme as quickly as possible to restore the level of performance against its service standard.

The lack of preparation meant that the organisational change was poorly implemented and had contributed to a deterioration in the service provided to customers at Glasgow PEO

Getting it right first time

4.35 Customer service excellence requires not only timeliness in decision-making, but that a public body does everything it can to ensure the quality of its decision-making. In other words, UKVI should take all necessary steps to ensure that it gets its decisions right first time. Besides ensuring that its decision-makers are properly trained, UKVI also needs to have systems in place to provide confidence that the decisions made by its staff are made in accordance with legislation, policy and guidance governing this work.

4.36 Staff were not aware of any quality assurance process linked to their decision-making and stated they had not received feedback from managers on decision quality. We asked UKVI to provide management information to provide evidence of the actions it took to quality assure decision-making. This showed that in no fewer than six of the calendar months between December 2012 and November 2013 no quality assurance checks were made on any decisions made by staff in Glasgow. Even more surprising was that not a single quality assurance check had taken place since August 2013, which was precisely the period when decision quality should have received greater priority than usual given the:

In no fewer than six of the calendar months between December 2012 and November 2013 no quality assurance checks were made on any decisions made by staff in Glasgow

- change in operational model;

²² Booking of available appointments by agents for the purposes of offering services to would-be applicants.

- change in personnel charged with decision-making; and
- concerns that had been raised by staff.

4.37 We were informed that quality checks had not been carried out due to resource constraints, but this was clearly an issue that the introduction of the new operating model should have addressed. The lack of focus on decision quality mirrored our report into decision quality at UKVI's Warsaw Visa Section,²³ where we made similar comments about the lack of effective management oversight.

4.38 The lack of quality assurance means that UKVI can have limited confidence in the quality of decisions made at Glasgow PEO since the introduction of its new operating model. During this period 2,416 individuals were granted permission to remain in the UK with 1,106 being granted permanent residence.

The lack of quality assurance means that UKVI can have limited confidence in the quality of decisions made at Glasgow PEO since the introduction of its new operating model

We recommend that the Home Office:

Sets minimum acceptable levels of quality assurance checks and ensures that they are conducted across the PEO network.

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

4.39 Complaints are a valuable source of feedback for a public body and can provide an organisation with early warnings of problems with service delivery. Learning from complaints can also lead to service improvements and to fewer complaints in the future. An important indicator of a customer-focused approach is the way in which complainants are treated and their complaints handled. Applicants need to know how to complain, which requires a public body to provide clear, accurate and easily accessible information about the complaints procedure, including:

- which type of complaints can be considered;
- service standards for complaints handling; and
- possible remedies in the event that a complaint is upheld.

4.40 Staff told us that if a customer raised an issue they would try to resolve it there and then, but if this was not possible they would refer the customer to the UKBA website²⁴ or to a leaflet on the notice-board. We were also told that the decision letter which a customer receives when their application is decided contains the email address to which complaints should be addressed.

4.41 We found that none of the public areas at Glasgow PEO contained any information about the complaints process. We also noted that whilst decision letters invited applicants to complete an online anonymous customer satisfaction survey, there was no reference to the procedure for making a complaint.

²³ <http://icinspector.independent.gov.uk/wp-content/uploads/2013/12/An-Inspection-of-Decison-Making-Quality-in-the-Warsaw-Visa-Section.pdf>

²⁴ The website of the former agency still contains information and application forms relevant to applicants of UKVI, but this information will be transitioned to a new government-wide platform later in 2014.

4.42 Staff we spoke to were unable to provide us with information about the service standards for complaint handling or to provide any detail about how a complaint was dealt with once submitted. Senior managers told us that the handling of complaints concerning all PEOs had been centralised in late November 2013 and discussions about service standards had not yet taken place. We were later informed that the central team responsible for handling complaints was currently working to UKVI's 20-day response target.

Staff we spoke to were unable to provide us with information about the service standards for complaint handling or to provide any detail about how a complaint was dealt with once submitted

4.43 UKVI was unable to provide us with management information indicating performance against its complaint response target either before or after the complaint handling process had been centralised. The data for December 2013 was not yet ready and data prior to the change was not available due to an unexpected staff absence. We were surprised that this data was not held centrally, which implied that Glasgow PEO had not been required to provide management information to evidence its performance in this area.

4.44 It was good that staff attempted to resolve issues as they arose, rather than simply relying on the formal complaints process. However, not all dissatisfied applicants would want or feel able to raise their concerns verbally at the time and in our view there should have been clear and prominent signposting to the complaints process in the public areas. Whilst this information was available on the website, it should also have been made available in the PEO. Glasgow PEO is due for a major refurbishment and this will provide a timely opportunity to rectify this issue.

We recommend that the Home Office:

Provides up-to-date information about the complaints process at PEOs, with complaint posters and leaflets being available in public areas, and ensures that staff understand and can explain the process to applicants.

4.45 A further indicator of good practice in complaint handling is the extent to which an organisation utilises feedback and learns lessons from complaints in order to improve service delivery. In the 12-month period from December 2012 to November 2013, UKVI received 59 complaints from applicants concerning Glasgow PEO. Of these 34 (58%) concerned delays in reaching a decision, the majority of which were delays caused by IT outages (27 of 34). Other reasons included:

- disagreement with the outcome of the application (10%);
- the service offered by staff at the PEO (27%); and
- delays in processing Biometric Residence Permits or errors in the permit when received (5%).

4.46 We saw no evidence that the analysis of complaints had led to tangible improvements in customer service. However, we were informed by UKVI that complaints were analysed according to the category of complaint and, where these concerned the actions of an individual member of staff, this would be discussed with them where appropriate to improve individual performance.

4.47 Where wider organisational issues were identified, such as persistent IT outages, these were discussed at team meetings and escalated to senior managers as required. Evidence of this escalation of problems impacting on service delivery was provided in the monthly customer feedback reports that used to be undertaken prior to October 2013.

Customer surveys

- 4.48 Other more proactive methods of obtaining customer feedback are possible, for example through the use of customer surveys. Prior to October 2013 staff at Glasgow PEO distributed customer satisfaction feedback forms on Monday, Wednesday and Friday of each week to applicants at the end of the application process. This 'Tell us what you think' survey asked how satisfied applicants were with the:
- information on the UKBA website;
 - appointment booking process;
 - security screening at the PEO;
 - conduct and manner of staff at the PEO;
 - speed of the service; and
 - standard of accommodation.
- 4.49 The results of the monthly survey were collated by a member of staff at Glasgow PEO and a monthly customer feedback report was produced showing the customer satisfaction rates, key themes highlighted and actions and recommendations based on the survey feedback. We were told that this document was discussed in team meetings.
- 4.50 This process was popular with staff, as it provided immediate feedback on the service they were providing from the customer perspective. It also provided evidence that managers and staff were exploring improvements to the service offered, directly related to the feedback obtained through the survey. One example of this was a review of the appointment booking system based on consistent feedback that applicants found the process difficult. Another was consideration of the provision of a television in the public area to provide rolling news coverage whilst applicants were waiting for their decision to be made.
- 4.51 We were told that a television would be provided at Glasgow PEO as part of a forthcoming refurbishment, and that an online payment system had been introduced to deter the harvesting of appointments by agents, which had previously made it difficult for applicants to find available appointment slots. The introduction of a booking fee or a requirement to pay the entire fee in advance for most applications had alleviated this problem. It was pleasing to see that these concrete improvements which were directly attributable to the proactive efforts taken by UKVI to listen to its applicants.
- 4.52 After October 2013, staff no longer distributed survey forms. Instead, the decision letter issued to applicants at the PEO invited them to provide feedback on the service provided by completing an online survey. UKVI stated that the results of these online surveys concerning all PEOs would be collated centrally on a quarterly basis. At the time of our inspection this system had been in operation for just over two months and the quarterly collation and analysis had yet to be completed.
- 4.53 In principle, there was nothing wrong with either the move to an online survey or the centralisation of the collation and analysis of feedback. There may be sound efficiency and value-for-money justifications for doing so. It may also give senior managers a simpler way of identifying issues which are common to the PEO network and those which affect an individual PEO.
- 4.54 UKVI will want to ensure, however, that the move to an online system does not significantly impair the volume of valuable customer feedback received. In addition, it will need to take a view, as the new system beds in, on whether the quarterly collation and analysis of feedback allows a sufficiently timely and agile response to problems as they occur.

4.55 When we asked about this issue following the inspection, UKVI informed us that just seven feedback forms had been received in December concerning Glasgow PEO. This was a significant reduction on the average of 55 feedback forms per month which were received when Glasgow staff distributed the feedback forms. We were told that UKVI was investigating the possibility of combining the online survey and immediate feedback surveys to be used together.

5. Inspection Findings – Safeguarding Individuals

All individuals should be treated with dignity and respect and without discrimination in accordance with the law.

5.1 We found no evidence that staff were discriminating against applicants when making decisions. This was reinforced by our findings from the focus groups and from our observations of the Premium Service process. The results of UKVI customer surveys completed between January and September 2013 also supported our findings, with virtually all applicants commenting that they were satisfied they had been treated fairly by staff.

We found no evidence that staff were discriminating against applicants when making decisions

5.2 Managers informed us that there was an equality and diversity officer on site, who provided regular updates at monthly team meetings. Managers and staff also confirmed that they had completed the mandatory e-learning training on equality and diversity.

5.3 We observed staff treating all applicants with courtesy and respect throughout each step of the process. Although we noted that male security guards were present for the security check process, we were informed that two female security officers were on hand if a female applicant requested this option. However, a female applicant whom we observed going through the security checks was not informed of this option, and we found no signage for applicants informing them that female security officers were available on request. Nonetheless, virtually all applicants surveyed by UKVI were very satisfied with the service provided by the security guards.

5.4 Staff had a strong customer service ethos and this was supported by the customer surveys that we asked customers to complete whilst on-site. We observed staff explaining the PEO process to the applicants and, when the decision was ready, how this would impact on their immigration status. In both scenarios, staff ensured that applicants understood the process, and what would be happening next. Applicants whom we surveyed whilst on site stated that UKVI staff had provided them with an excellent service and had been very helpful and polite.

Staff had a strong customer service ethos and this was supported by the customer surveys that we asked customers to complete whilst on-site

5.5 There were adequate facilities available for applicants, including:

- a nursing room for baby changing and feeding;
- accessible toilets for disabled applicants;
- lowered counters with removable chairs for wheelchair users;
- an audio loop for hard-of-hearing applicants;

- availability of a private interview room on request; and
- a prayer room in the adjacent building.

- 5.6 We noted that signposting for applicants informing them of the facilities available should be improved both locally and on the website, especially those for nursing mothers and for applicants who might need to use a prayer room. The absence of such information had the potential to deter applicants from using the Premium Service.
- 5.7 At the time of our inspection, Glasgow PEO was about to undergo a major refurbishment of the accommodation, which aimed to provide better facilities in keeping with the 'Premium Service' concept. This will include new branding reflecting the change to UKVI, more comfortable seating and a play area for children.

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

- 5.8 All staff had a good awareness of their responsibilities regarding the treatment of personal data and had completed the mandatory e-learning course in respect of information security and data protection. A clear desk policy was in place, and regular security sweeps were conducted by the security manager to ensure compliance with the process. We also noted that files were stored in a locked cabinet when not in use and at the end of each day, with the keys to the storage units locked away in a combination safe.

Annex A: Role & Remit of the Chief Inspector

The role of the Independent Chief Inspector ('the Chief Inspector') of the UK Border Agency (the Agency) was established by the UK Borders Act 2007 to examine and report on the efficiency and effectiveness of the Agency. In 2009, the Independent Chief Inspector's remit was extended to include customs functions and contractors.

On 26 April 2009, the Independent Chief Inspector was also appointed to the statutory role of independent Monitor for Entry Clearance Refusals without the Right of Appeal as set out in section 23 of the Immigration and Asylum Act 1999, as amended by section 4(2) of the Immigration, Asylum and Nationality Act 2006.

On 20 February 2012, the Home Secretary announced that Border Force would be taken out of the Agency to become a separate operational command within the Home Office. The Home Secretary confirmed that this change would not affect the Chief Inspector's statutory responsibilities and that he would continue to be responsible for inspecting the operations of both the Agency and the Border Force.

On 22 March 2012, the Chief Inspector of the UK Border Agency's title changed to become the Independent Chief Inspector of Borders and Immigration. His statutory responsibilities remain the same. The Chief Inspector is independent of the UK Border Agency and the Border Force, and reports directly to the Home Secretary.

On 26 March 2013 the Home Secretary announced that the UK Border Agency was to be broken up and brought back into the Home Office, reporting directly to Ministers, under a new package of reforms. The Independent Chief Inspector will continue to inspect the UK's border and immigration functions, as well as contractors employed by the Home Office to deliver any of these functions. Under the new arrangements, the UK Visas and Immigrations department (UKVI) was introduced under the direction of a Director General.

Annex B: Inspection Criteria

The criteria used in this inspection were taken from the Independent Chief Inspector's Inspection Criteria, revised and updated in August 2013. Figure 8 refers.

Figure 8: Inspection criteria used for this inspection

Operational Delivery

3. Resources should be allocated to support operational delivery and achieve value for money.
4. Complaints procedures should operate in accordance with the recognised principles of complaint handling.

Safeguarding Individuals

5. All individuals should be treated with dignity and respect and without discrimination in accordance with the law.
8. Personal data of individuals should be treated and stored securely in accordance with the relevant legislation and regulations.

Annex C: Glossary

Term	Description
A	
Assistant Director	Senior manager within UK Visas and Immigration, equivalent to a civil service Grade 7 position.
B	
Biometrics	All applicants are routinely required to provide ten-digit finger scans, a digital photograph and signature when applying for settlement or an extension of stay.
C	
Complaint	Defined by the UK Border Agency as ‘any expression of dissatisfaction about the services provided by or for the UK Border Agency and/or about the professional conduct of UK Border Agency staff including contractors’.
Customer	Defined by the former UK Border Agency as ‘anyone who uses the services of the Agency, including people seeking to enter the United Kingdom, people in detention and MPs’.
Customer Service Excellence	The Government’s customer service standard, replaced the Charter Mark initiative.
D	
Data Protection Act 1998	The Data Protection Act requires anyone who handles personal information to comply with a number of important principles. It also gives individuals rights over their personal information.
Director	Senior UK Visas and Immigration manager, typically responsible for a directorate, region or operational business area.
Director General	Senior Civil Servant at the head of UK Visas and Immigration.
E	
e-Learning	Computer based training course.
H	
Home Office	The Home Office is the lead government department for immigration and passports, drugs policy, crime, counter-terrorism and police.
I	
Immigration Rules	The Rules laid before Parliament by the Home Secretary about the practice to be followed in regulating the entry into and stay in the UK of people subject to immigration control.

L	
Leave to remain	Permission given to a person to reside within the UK for a designated period.
P	
Points-based System (PBS)	<p>On 29 February 2008, a new immigration system was launched to ensure that only those with the right skills or the right contribution can come to the United Kingdom to work or study. The Points-based System was designed to enable the former UK Border Agency to control migration more effectively, tackle abuse and identify the most talented workers. The system:</p> <ul style="list-style-type: none"> • combines more than 80 previous work and study routes to the United Kingdom into five tiers; and • awards points according to workers' skills, to reflect their aptitude, experience and age and also the demand for those skills in any given sector. <p>Employers and education providers play a crucial part in making sure that the Points-based System is not abused. They must apply for a licence to sponsor migrants and bring them into the United Kingdom, and fulfil a number of duties while they are sponsoring migrants.</p>
R	
Regional Director	Senior manager responsible for one of the former six Immigration Group regions.
S	
Settlement	Application to settle in the UK on a permanent basis, most commonly as the spouse or other dependant of a British Citizen or UK resident.
U	
United Kingdom Border Agency (UKBA)	The Agency of the Home Office formerly responsible for enforcing immigration and customs regulations. Its Agency status was removed on 31 March 2013 and its functions returned to the Home Office to form two new bodies.
UK Visas and Immigration	One of the two operational commands set up under the direct control of the Home Office in place of the UK Border Agency which was broken up on 26 March 2013. From 1 April 2013 this department handles all overseas and UK immigration and visa applications.

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Assistant Chief Inspector: **Garry Cullen**

Lead Inspector: **Cliff Buckley**

Inspection Officers: **Addeel Khan**
Remmy Ahebwa
Akua Brew-Abekah

If you would like further information about this inspection, please contact the Independent Chief Inspector of Borders and Immigration.

Email: chiefinspectorUKBA@icinspector.gsi.gov.uk

Website: www.independent.gov.uk/icinspector/contact

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