



An Unannounced Inspection of the Service Provided by Solihull Premium Service Centre

March 2015



David Bolt
Independent Chief Inspector of
Borders and Immigration

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Independent Chief Inspector of Borders and Immigration

Foreword

Premium Service Centres (PSCs) in the United Kingdom offer a 'premium' same day service to non-European nationals making straightforward applications to settle in the UK, and to certain categories of applicants who want to extend their leave to remain in the United Kingdom.

The premium service is available through the payment of a fee (£400) in addition to the application fee for a standard postal application. There are seven PSCs in the UK which offer this service: Belfast, Cardiff, Croydon, Glasgow, Liverpool, Sheffield and Solihull. Two of these centres, Croydon and Glasgow were inspected in 2010 and 2014 respectively. This inspection looked at the Solihull PSC.

Overall, Solihull PSC was found to be performing effectively and efficiently, with the vast majority of applicants receiving a same day decision, and with any delayed decisions explained to the applicant and the case actively progressed. However, the inspection found that UKVI was acting unreasonably in retaining both the premium application fee and the standard fee paid by those applying for Indefinite Leave to Remain (ILR) via the premium service before they qualified to do so. One such instance was identified during the inspection at Solihull. The report contains one Recommendation which addresses this issue.

This report was submitted to the Home Secretary on 10 July 2015.

David Bolt

Independent Chief Inspector of Borders and Immigration

Scope and Purpose

Scope and purpose

This inspection examined the service provided to applicants by the Premium Service Centre (PSC) in Solihull in order to assess whether it was being delivered efficiently and effectively, specifically whether:

- information made available to applicants, including PSC service standards and how to make complaints, was clear and complete;
- service standards were being met;
- PSC staff were complying with the UKVI Operating Mandate in making decisions, in particular in relation to security checks and record-keeping, and whether any delays to the 'same-day' service were justified and cases actively managed to a conclusion;
- decisions were reasonable and consistent; and
- PSC staff were dealing with all applicants with dignity, respect and without discrimination.

The inspection

The inspection:

- reviewed the information made available to applicants through the UKVI website;
- conducted a 'mystery shopper' exercise (by acting as potential applicants) of the online and telephone appointment booking system;
- on 4 March 2015 at 08.30, visited the Solihull PSC, giving no prior notice of inspection, and
 - observed the PSC process end to end, including security screening, biometric capture, case consideration and dispatch;
 - examined the accommodation and facilities provided for applicants;
 - held interviews and focus groups with managers and staff;
 - surveyed applicants, seeking their feedback about:
 - > ease of the online booking system;
 - > provision of easily accessible information on the UKVI website;
 - > staff courtesy and professionalism;
 - > suitability of the accommodation;
- reviewed the results of UKVI's monthly customer satisfaction surveys from March 2014 to February 2015; and
- analysed 50 randomly-selected electronic caseworking records relating to decisions made by Solihull PSC between 1 November 2014 and 31 January 2015, to assess compliance with the UKVI Operating Mandate.

The high-level emerging findings were presented to UKVI on 26 March 2015. The key findings and one recommendation for improvement are set out below.

1. Key Findings

What was working well

- 1.1 The inspection found that information about the premium appointment service was available to customers on the GOV.UK website and was displayed inside Solihull Premium Service Centre (PSC). The latter included the PSC's service standards and how they were calculated, as well as information about the complaints procedure. The information provided to applicants was clear and consistent.
- 1.2 Staff and managers were committed to delivering an effective customer service to applicants. As a result, Solihull PSC was consistently meeting or exceeding its commitment to process 98.5% of applications received on the day of receipt.
- 1.3 Where applications could not be decided on the same day, management oversight was effective and ensured that the cases were progressed towards a decision. Detailed notes on the caseworking system identified the reasons for delay in deciding the applications.
- 1.4 File sampling showed that mandatory security checks were being conducted in line with the requirements of the UK Visas and Immigration (UKVI) Operating Mandate. There was a considerable focus on quality assurance, with decisions made by caseworkers routinely subjected to local quality assurance checks.
- 1.5 Following refurbishment in early 2014, the public areas of the Solihull PSC were clean, smart and welcoming. Applicants were positive about the service they had received.

Areas for improvement

- 1.6 The inspection found that UKVI was correctly refusing applications for Indefinite Leave to Remain (ILR) from applicants who had submitted their application before they had completed the qualifying period, but was then retaining both the premium service fee and the standard application fee. This was unreasonable given that the online system accepted such applications. The 84 page application form and 11 pages of guidance notes did not adequately highlight that premature applications would be treated in this way.

Overall finding

- 1.7 Overall, Solihull PSC was found to be performing effectively and efficiently, with the vast majority of applicants receiving a same day decision, and with any delayed decisions explained to the applicant and the case actively progressed. Mandatory security checks were being conducted in all cases and there was a significant improvement in management assurance activities around decision quality. Refurbishment of the Solihull PSC had created a smarter, more welcoming environment and managers and staff were focused on customer service. However, UKVI was acting unreasonably by retaining the premium application fee and standard fee paid by Indefinite Leave to Remain (ILR) applicants who applied before qualifying to do so. One such instance was identified during the inspection at Solihull.

2. Summary of Recommendations

Recommendation: The Home Office should:

Take action to ensure that:

- a technical solution is found to prevent premium service applicants from applying for Indefinite Leave to Remain (ILR) more than 28 days before completing the relevant qualifying period; or
- ILR applicants do not lose the whole of their application fee if they apply via the premium service before they have completed the relevant qualifying period.

3. The Inspection

Background

- 3.1 On 28 April 2014, Public Enquiry Offices were renamed Premium Service Centres (PSCs) and rebranded following feedback from customers and staff, and as part of a wider expansion and improvement of premium services offered by UK Visas and Immigration (UKVI).
- 3.2 UKVI offers a premium (same day) service to non-European nationals making straightforward applications to settle in the UK and to applicants in certain categories¹ who are seeking to extend their stay in the UK. There are seven PSCs² in the UK which offer this premium service.
- 3.3 A premium service applicant must pay £400 on top of the standard fee for a postal application. Appointments must be made online, unless the application is for a family group of 12 or more people, in which case the appointment 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.

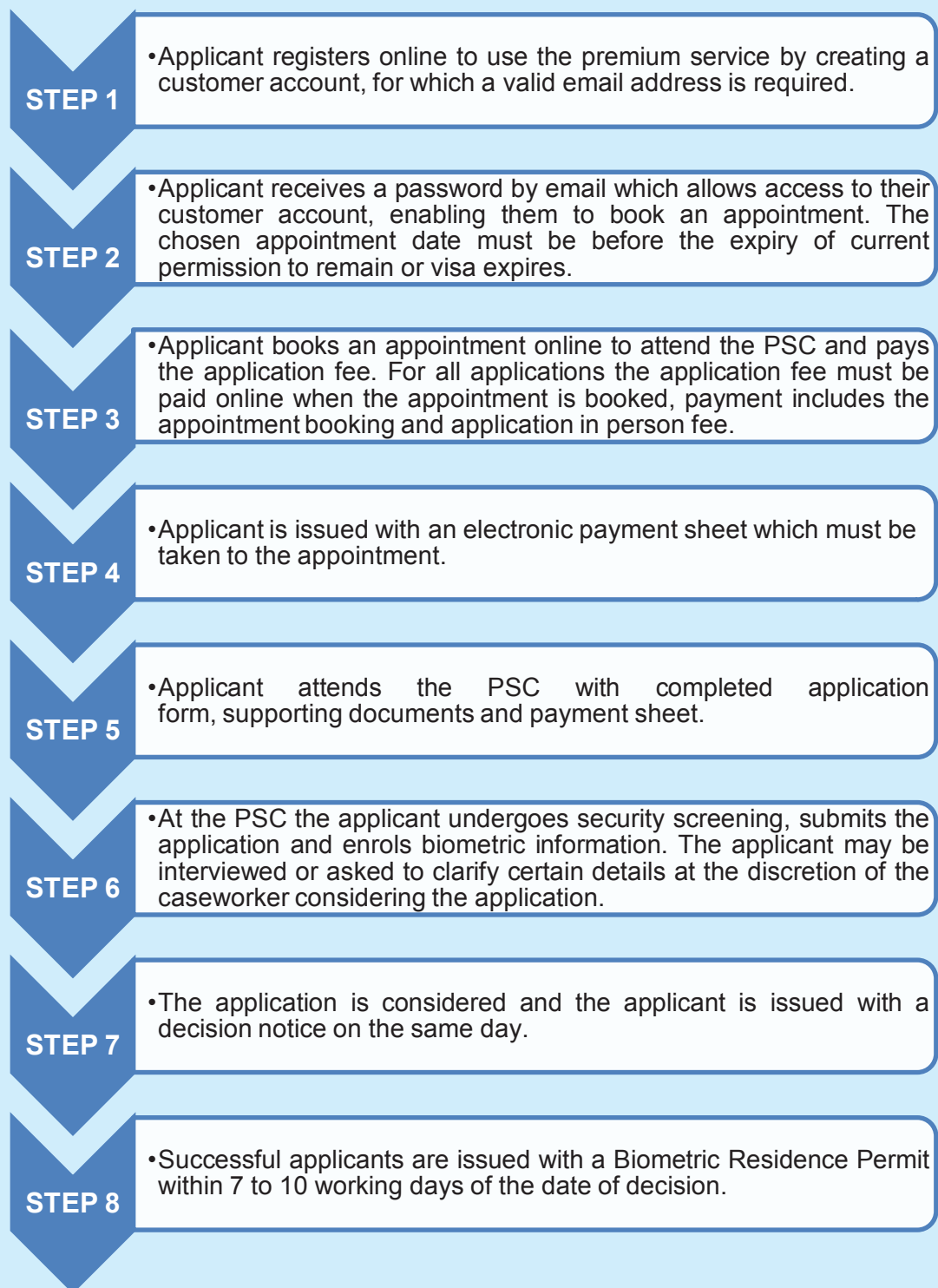
¹ The types of application that can be made using the premium service can be found here:

<https://www.gov.uk/ukvi-premium-service-centres/eligibility>

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

³ The 'Life in the UK 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

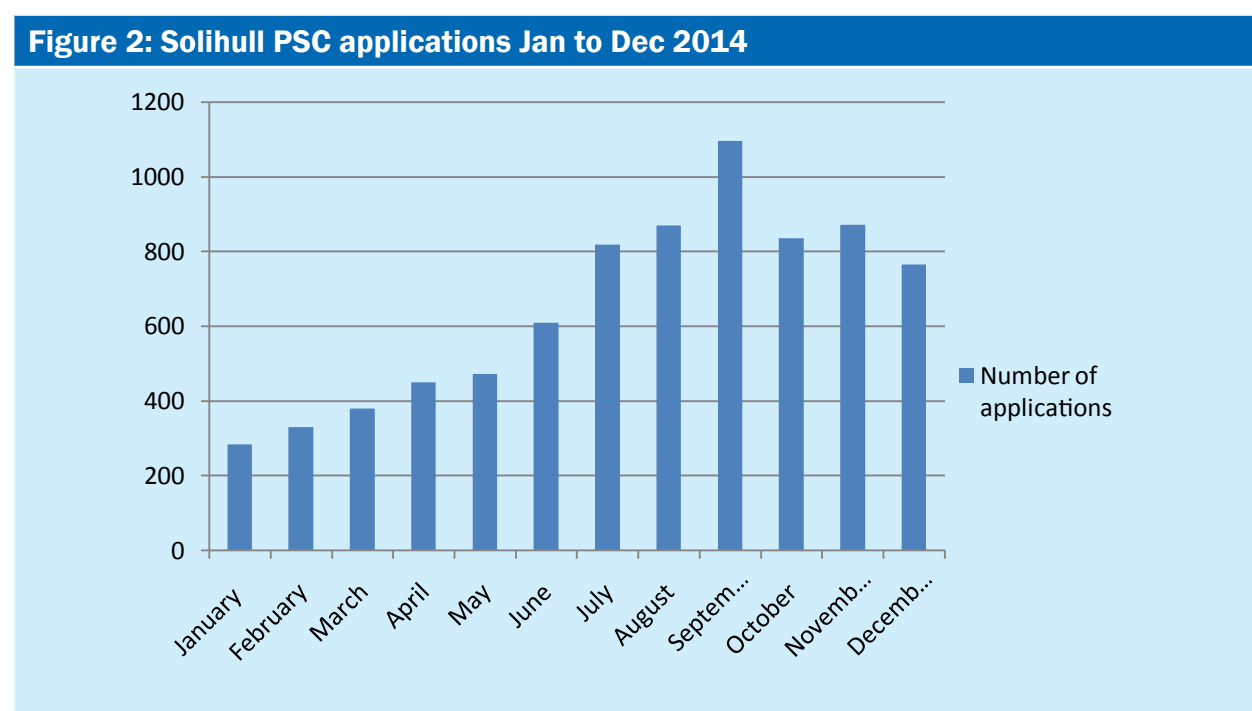


Note: Details correct as at 4 March 2015.

3.5 In April 2011, all of the then Public Enquiry Offices were awarded Customer Service Excellence (CSE) Accreditation. In September 2014, all seven PSCs were reaccredited. This followed an assessment of the services they offered, with a particular focus on delivery, timeliness, information, professionalism and staff attitudes.

Solihull PSC

3.6 Following recruitment and refurbishment in early 2014 to improve capacity and capability, Solihull PSC has the capacity to deal with up to 40 appointments per day, an average of around 800 applications per month. At the time of inspection it had 24 staff, led by a Senior Executive Officer (SEO). For 2014/15, it had an income generation target of £8.9 million. Figure 2 shows the number of applications handled by Solihull PSC between January and December 2014.



Note: Data provided by UKVI.

Methodology

3.7 The inspection was devised using five of the Chief Inspector’s core inspection criteria.⁴ These are grouped under the headings of Operational Delivery and Safeguarding Individuals and are listed at Appendix B. In conducting the inspection and producing this report, the inspection team had regard to the findings and recommendations of two previous inspections which examined the level of customer service provided by the Croydon⁵ and Glasgow PSCs.⁶

3.8 Figure 3 provides a breakdown of the staff we interviewed by grade.

Figure 3: UK Visas and Immigration staff interviewed

Grade	Number of staff
Assistant Director/Grade 7	1
Senior Executive Officer (SEO)	1

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

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

6 <http://icinspector.independent.gov.uk/wp-content/uploads/2014/06/Glasgow-Public-Enquiry-Office-FINAL-19-June.pdf>

Higher Executive Officer (HEO)	3
Executive Officer (EO)	3
Administrative Officer (AO)	3
Total	11

4. Inspection Findings – Operational Delivery

Appointment booking

- 4.1 We conducted a ‘mystery shopper’ test of the online and telephone appointment booking systems, to determine the ease with which applicants could access a suitable appointment at Solihull PSC. We undertook this exercise between 25 February and 3 March 2015, with a follow-up check on 9 March 2015.
- 4.2 With the online system we found that, on average, appointments were available for single applicants within three working days. At certain times, appointments were available within two working days, and the longest wait was four working days.
- 4.3 For an applicant with two minor dependents, the average wait for an appointment was six working days, although in some cases the waiting time was seven working days. Given these longer waiting times, UKVI should consider making more family appointments available.
- 4.4 Applicants who apply as part of a family group of 12 or more have to use the telephone booking system, dialling an 0300⁷ number operated by the UKVI contact centre. Our previous inspection of Glasgow PSC found that a premium rate 0870 phone number was being used. A less expensive telephone service is an improvement from a customer service perspective, and is in line with recommendations made by the House of Commons Public Accounts Committee that callers accessing public services should have access to low cost alternative numbers.⁸
- 4.5 UKVI told us that its service standard for the contact centre was to answer 80% of telephone calls within 20 seconds. At the time of inspection, the contact centre’s 2014-15 year to date figure was 80.3% of calls answered across all lines of enquiry. This was a much improved performance compared to 39% of calls answered in 2013-14.

Service standards

- 4.6 UKVI’s published customer service standard for premium services advises applicants that ‘most applications are processed the same day if all the information needed is brought to your appointment’.⁹ It also made clear that the service standard processing time starts when an applicant arrives for their appointment at the PSC, and ends when they receive their decision.
- 4.7 While on-site, we noted further information displayed in the customer waiting area, stating that Solihull PSC aimed ‘to decide 98.5% of completed applications on the same day’. Posters inside the waiting area detailed further what applicants could expect at each stage of the premium service process, and that the PSC aimed to process applications within two hours and 30 minutes. While applicants had access to this information when attending the PSC, the aim to process 98.5% of applications the same day was not published on the GOV.UK website. UKVI should consider including this information on its website.

7 <https://www.gov.uk/ukvi-premium-service-centres/book-an-appointment>

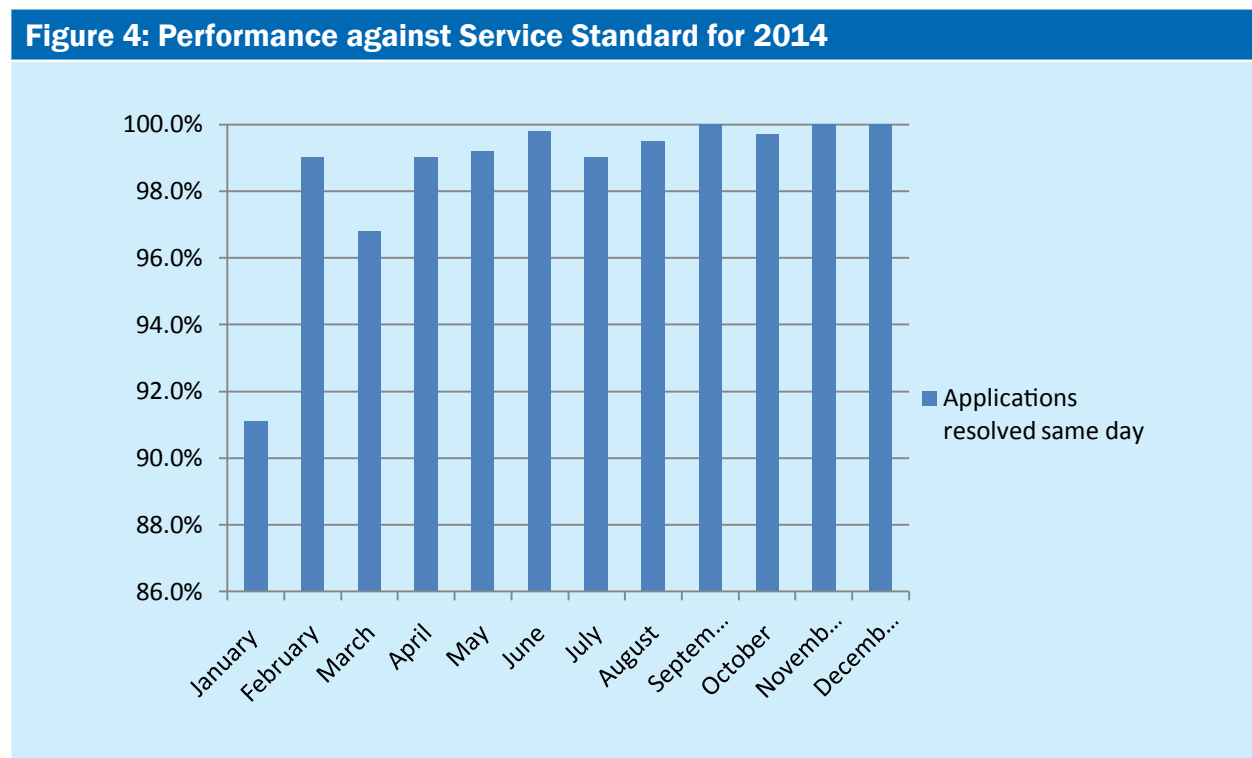
8 <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmpublic/617/617.pdf>

9 <https://www.gov.uk/government/organisations/uk-visas-and-immigration/about/about-our-services>

- 4.8 We were informed that where the service standard was not met and UKVI was at fault, for example, IT problems or biometrics systems failures, applicants would be refunded the premium service fee. Where the delay in deciding an application was due to the complex nature of the case and, for example, further checks were needed, or the applicant needed to provide further information or documents, no refund was offered.
- 4.9 The GOV.UK website notified applicants of the possibility that they might not receive a decision on the same day if their application required further checks to be conducted. Managers and staff told us that in these cases applicants would be advised that the decision would take longer than two hours and 30 minutes, or they would both speak to applicants and provide them with a written explanation as to why a decision could not be made on the same day, and what the applicant's options were.
- 4.10 Information provided to customers about service standards and how they were calculated was clear and consistent. This was an improvement on our previous inspections and in line with recommendations made. However, while an individual who was considering making a premium service application would be able to access information about the service standard that they should expect, UKVI did not provide any information about its performance against these service standards. We believe that this would enhance the information provided to customers.

Performance against service standards

- 4.11 Figure 4 provides UKVI's performance against its '98.5% same day' service standard for straightforward¹⁰ applications made at Solihull PSC in 2014.



Note: Data provided by UKVI.

- 4.12 This shows that, with the exception of January and March 2014, Solihull PSC consistently met or exceeded its commitment to provide same day decisions in 98.5% of straightforward cases. At the time of inspection, managers told us that Solihull PSC had further improved its performance, processing over 99.5% of such applications on the same day. We believe that this performance should encourage applicants considering the premium service application option.

¹⁰ Applications UKVI can make a decision on without asking the applicant for more information.

- 4.13 Managers told us that premium service applications were actively monitored from the moment the applicant arrived in order to minimise any delays in the process. We were informed that, for cases not decided on the day, a layered approach¹¹ to service standards as used with international visa operations would not be appropriate, because the *'time taken to decide a complex case was dependent on the degree and nature of the complexity'*.
- 4.14 Cases not decided on the same day were placed in a Work in Progress (WIP) queue following discussion with and approval by a senior caseworker. On 11 March 2015 (one week after the on-site visit), management information showed that 40 cases were being held in the WIP queue, ranging from four days old to 11 months.
- 4.15 Managers stated that the WIP was reviewed daily and detailed in monthly performance reports to senior management. This ensured constant monitoring of the oldest cases, including what progress had been made and any barriers to making a decision. By 1 April 2015, 13 of the 40 applications had been decided.¹² After reviewing notes on the caseworking database, we found that the remaining applications had not been resolved for reasons outside the PSC's control, mainly because:
- further advice was being sought in relation to the applicant's English language ability or the college providing the English language certificate;
 - a police prosecution was pending or criminal investigations were ongoing; and/or
 - further enquiries were being made in relation to the evidence provided.
- 4.16 In contrast to our findings in the inspection of Glasgow PSC, we found that cases in the WIP were being actively progressed towards a decision. Figure 5 provides details of such a case.

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

The applicant:

- on 27 June 2014, submitted an application in person at Solihull PSC for Indefinite Leave to Remain (ILR); and
- as at 1 April 2015, was still awaiting a decision on their application.

UK Visas and Immigration:

- on 27 June 2014, entered a note on its caseworking database showing:
 - > checks conducted and outcomes, which revealed a trace result on the Police National Computer (PNC);¹³
 - > how the decision-maker had taken account of the supporting evidence provided with the application and where it satisfied or did not satisfy the requirements of the Immigration Rules; and
 - > that the case would be held pending a prosecution by the Crown Prosecution Service.
- also on 27 June 2014, issued the applicant with a letter explaining why a decision could not be provided that day;
- between 27 June 2014 and 1 April 2015, checked progress of the pending prosecution regularly, entering notes on its database each time; and

¹¹ For example, for entry clearance cases UKVI aims to process 90% of non-settlement applications within 3 weeks, 98% within 6 weeks and 100% within 12 weeks of the application date.

¹² Nine applications granted leave to remain (five ILR and four LTR), and four refused leave to remain (two ILR and two LTR).

¹³ PNC holds details of convictions, impending prosecutions, immigration absconders etc, which can be electronically accessed by Home Office Staff.

- responded to correspondence or further enquiries from legal representatives, providing reasons why the application had not been resolved.

Chief Inspector’s comments:

- The notes on the caseworking database set out clearly why the application had not been decided.
- Mandatory security checks were being conducted properly and the results taken into consideration before making a decision.

Resources

- 4.17 UKVI is committed through its Operating Model to resourcing its premium service at the level required to deliver an effective and efficient service and enhanced customer experience. We reported previously on the ineffective implementation of UKVI’s new Operating Model in Glasgow PSC, and how this had impacted their performance against the ‘same day’ service standard. We were told during the Glasgow inspection that the model was designed to enhance the delivery of premium services. In order to achieve this and improve resilience, additional staff had been recruited to standardise the regional PSC structure, and facilitate the extension of opening hours.
- 4.18 One of the changes introduced by the new model involved Administrative Officers (AOs) being deployed in customer-facing roles, with higher-graded staff (Executive Officers – EOs) performing more complex tasks such as decision-making. This was a better use of resources and aligned with decision-making in UKVI’s international operations.
- 4.19 Staff at Solihull PSC had settled into their roles following the changes introduced by the new model. We were told that all Solihull PSC staff were multi-skilled and capable of performing the AO role if required. This allowed managers the flexibility to reallocate staff resources to meet fluctuating customer demand, and to cover any gaps or absences at this grade to ensure a good service was maintained.
- 4.20 Managers told us there was capacity to take on a small number of postal applications, and to progress casework applications in the WIP queue when demand for premium services was low. However, staff seemed concerned that any resources directed towards the WIP could impact their ability to maintain service standards. We saw no evidence to support this view and, as shown in Figure 4, UKVI had continued to meet or exceed customer service standards in relation to the same day service offered by Solihull PSC.
- 4.21 Managers also told us that during peaks in demand for premium services in Solihull, pressure on resources could be alleviated by flexing the number of appointments. UKVI had also extended the PSC’s opening hours to two evenings a week and two Saturdays a month to provide customers with greater choice and availability of appointments. This ensured that service standards were maintained.
- 4.22 At the time of inspection, most caseworkers were achieving seven decisions per day, in line with productivity targets. Managers told us that ‘*in order to measure performance, average figures were taken over a one month period to allow for [daily] fluctuations due to complex cases*’. We were told that this was a uniform approach across all PSCs.
- 4.23 While on-site we observed the operational manager using a workflow management spreadsheet to monitor daily performance via the QMatic¹⁴ system. Although the spreadsheet was manually

¹⁴ A numerical customer tracking tool which allows the PSC to manage the customer journey from entry into the PSC, to service of the decision.

updated, both managers and staff found the tool effective in tracking 'same day' applications, because it:

- allowed managers to view exactly where in the application process any individual was at any point;
- supported the quick retrieval of documents, if required; and
- acted as an audit tool, enabling managers to tell which staff had handled an application.

4.24 The spreadsheet was also used to populate local weekly and monthly performance statistics. We considered this an effective monitoring tool, used to ensure that applications were progressed efficiently. This practice had been shared with other PSCs.

4.25 The workflow management spreadsheet had also played a key role when agreeing assistant caseworker targets, especially as the initial targets that were set were considered unrealistic by staff. Solihull PSC had been able to use the spreadsheet, which monitored outputs, including how long each stage of the application process took, to determine average performance over a three month period. This resulted in more realistic targets being recommended, which were accepted by managers.

Mandatory checks

4.26 Following our inspection of Glasgow PSC where we highlighted that management assurance activities were ineffective, UKVI identified that mandatory Warnings Index¹⁵ checks, which should have been completed prior to any decisions being made, had not been consistently carried out. In response,¹⁶ the Home Office took action to ensure that premium service centres were conducting the necessary security checks. It did this by:

- introducing a more comprehensive checking system;
- reviewing and circulating specialist training material; and
- issuing new guidance to staff on the mandatory security checking requirements.

4.27 In November 2014, UKVI launched its Operating Mandate to help support one of its core principles: 'to be consistently competent.' UKVI define this as getting the basics right by conducting the right checks on every application, every time, making correct decisions, meeting service standards and making the application process as clear and simple as possible. As part of the case consideration process, PSC staff were responsible for undertaking mandatory security checks on each applicant to confirm their identity and ensure there was no adverse information about them which might materially affect the outcome of their application (for example previous immigration abuse or criminality).

4.28 Staff and managers told us they had always carried out these checks, but the Operating Mandate had formalised the process. They believed that this had led to a more consistent approach to this process within the PSC network.

Sample results

4.29 To assess compliance with the UKVI Operating Mandate, we sampled 50 electronic caseworking records, selected at random from decisions made by Solihull PSC between 1 November 2014 and 31 January 2015.

¹⁵ The UK's Watchlist contains sensitive and adverse information relating to individuals of interest to UKVI, Border Force and other government agencies within the UK.

¹⁶ <http://icinspector.independent.gov.uk/wp-content/uploads/2014/06/Home-Office-Formal-Response-to-ICI-Inspection-of-Glasgow-PEO-FINAL.pdf>

- 4.30 Our sampling found that mandatory Warnings Index (WI) and Police National Computer (PNC) checks had been carried out in line with the requirements of the Operating Mandate in all cases.
- 4.31 Where WI and/or PNC checks produced a trace, these were referred to a senior caseworker for advice, before being progressed to the decision stage. We were also informed that technical changes had been made to the Case Information Database (CID),¹⁷ adding an extra layer of assurance. Once an application had been set up on the database, prompts would remind staff to update the system with the results of the security checks, and would not let the decision be progressed to completion until this had been done.
- 4.32 Further assurance checks were introduced in July 2014, conducted by managers and senior caseworkers on 10% of 'live'¹⁸ applications, to ensure that mandatory security checks had been done by the caseworker. Management information provided by UKVI confirmed there had not been any missed traces on the WI and PNC from July 2014 to February 2015. However, we were told that there had been 22 instances in the same period where mandatory checks were conducted but the results had not been recorded on CID. We noted from data provided that these instances pre-dated the technical changes to CID.
- 4.33 While our sample found that WI and PNC checks and results were always recorded on the caseworking database, we found inconsistencies in the recording of additional mandatory checks; for example, travel document and identity verification and previous visa information on the Central Reference System.¹⁹ From our observations of the premium service application process, we were satisfied that both AO and EO caseworkers were conducting all mandatory checks in compliance with the UKVI Operating Mandate. However, our sample showed that these were not always consistently recorded, frustrating subsequent compliance checks by managers.
- 4.34 As part of UKVI's effort to improve decision quality and consistency across the PSC network, Case Consideration Templates²⁰ were provided to all PSC caseworkers in December 2014. In addition to prompting caseworkers to undertake mandatory checks, we were informed that the templates were also designed to allow caseworkers to demonstrate specifically which checks had been carried out, as well as to set out the decision rationale.
- 4.35 Most of our file sample was from a period prior to these templates being introduced. However, we found that the templates had not been used in the 15 case records we examined relating to decisions made in January 2015. While this was a new process at that time, UKVI needs to ensure that staff are now using these templates in all cases.

Quality assurance checks

- 4.36 One of the requirements of customer service excellence is setting appropriate and measurable standards not just for timelines in decision-making but also for the quality of service provided, which in this context means making the correct decision. Following our inspection of Glasgow PSC in December 2013, where we found a quality assurance process lacking, we identified the need for UKVI to have systems in place to provide confidence that decisions made by its staff were correct and considered in line with guidance.
- 4.37 Solihull PSC had a senior caseworker dedicated to quality assurance, through the random sampling of casework, and to providing immediate advice on complex cases to enable decisions to be made on the same day. We found that decisions made by caseworkers were regularly subjected to local quality assurance checks, with the outcomes discussed monthly in one-to-one meetings with managers. This

¹⁷ Database containing details of all foreign nationals who the Home Office has come into contact, either through applications of enforcement.

¹⁸ Cases not yet returned to the applicant.

¹⁹ A database containing details of all foreign nationals who have applied for Entry Clearance visas to the UK and visas issued

²⁰ Consideration Notes Templates specific to the different application types.

was a positive development since our inspection of Glasgow PSC.

4.38 We found that a decision quality framework was in operation across the PSC network, which aimed to assure all parts of the case consideration process. For 2014-15 Solihull PSC was tasked to achieve the following decision quality targets:

- '97% or more correct decisions;
- 7% or less correct decisions but with minor errors in the casework; and
- 2% or less incorrect or fatally flawed decisions'.

4.39 Decision quality data was collated for all PSCs on a monthly basis and reviewed by senior managers. We were told that particular focus was given to incorrect or fatally flawed decisions, with trends and/or issues identified. Management information provided by UKVI showed that, to date, it was achieving 98% correct decisions. Errors identified were mainly in relation to caseworkers applying the wrong expiry dates to grants of leave to remain. We were informed that this issue had been addressed through training, and the development of an online tool to assist caseworkers with their consideration. This was a clear improvement on our earlier inspection of Glasgow PSC.

4.40 Across the PSC network, senior caseworkers had a target of sampling 5% of all decisions made at their PSC. We found that the senior caseworker at Solihull had exceeded the monthly target by sampling an average of 9% of decisions made in 2014/15.²¹ Decisions made at the PSC were quality assured by a senior caseworker in one of three ways:

- a 5% sampling of decisions made during the month;
- 100% checking of refusal decisions before serving them on the applicant; and
- a 10% sampling of daily WI/PNC 'live' checks, done either by the senior caseworker or operational manager.

4.41 Staff said they were spoken to individually when concerns were identified with their decision quality. Otherwise, in the case of correct decisions or minor errors, feedback was provided via email. We also found that new caseworkers had 100% of their decisions checked. Deputy chief caseworkers had also begun randomly sampling senior caseworker reviews across the PSC network. This was an additional assurance check that caseworkers were complying with the Operating Mandate, and also ensured that senior caseworker reviews were consistent throughout the PSC network.

4.42 Managers and staff were committed to providing effective decisions, in line with policy and guidance. We consider that the quality assurance framework supported this objective.

Complaints handling

4.43 An important measure of a customer-focused approach is the way in which complainants are treated and their complaints are handled. PSC applicants need to know how to complain, which requires UKVI to provide clear, accurate and easily accessible information about the complaints procedure, including:

- the acceptable grounds for complaints;
- service standards for complaints handling; and
- the remedies, in the event that a complaint is upheld.

4.44 Staff and managers told us that they would try to resolve any issues raised by applicants on the day.

²¹ Year to date average figure in March 2015.

However, if this was not possible, they were provided with a complaints leaflet or directed to the GOV.UK website.²² All UKVI complaints are now handled by the Complaints Allocation Hub, based in Croydon, but we considered it was important for staff at the PSC to be able to communicate the procedure to applicants. Most staff we spoke to understood the complaints process and response times.

4.45 Further information about the complaints process was available on the notice board in the public waiting room area, encouraging applicants to speak to PSC staff if there were any concerns about the service, or to register complaints centrally via post or email. Publicising the complaints process is an example of good practice and in line with the recommendation²³ we made in our inspection of Glasgow PSC.

4.46 Published information states that following submission of a complaint, UKVI will aim to provide a response within 20 working days.²⁴ Managers told us that they would contribute to the response if required; however, this was prepared and dispatched by the central complaints team.

4.47 Solihull PSC received 35 complaints between March 2014 and February 2015. We were told that these were mainly for issues such as:

- unhappiness about receiving a refusal decision;
- clarity around the Immigration Rules and website; and
- fees for the service and availability of parking etc.

4.48 We found that only one of these complaints was not responded to within the 20 day target. In this case, a response was provided 55 working days after the complaint was received by UKVI.

Customer surveys and feedback

4.49 While on-site, we were made aware of mechanisms in place to collect feedback from applicants about their experiences at Solihull PSC. An electronic tablet device was placed in the public waiting area to collect customer feedback, however staff told us it was not being used effectively. This was primarily because it was not near the exit used by applicants once they had received their decisions. The responses collected using this tablet showed that applicants were satisfied with the service they received. The only concerns related to the availability of refreshments and parking facilities. The tablet is a quick and practical method for collecting feedback. It should be repositioned nearer the customer exit to increase the volume of feedback received.

4.50 To compensate for the unhelpful positioning of the tablet, staff also distributed customer satisfaction feedback forms to applicants who had been provided with decisions. Posters in the waiting area also invited applicants to complete the 'tell us what you think' customer surveys, which asked how satisfied they were with:

- information on the GOV.UK website;
- standard of accommodation and facilities;
- conduct and manner of staff;
- level of privacy during the visit; and
- overall visit to the PSC.

²² <https://www.gov.uk/government/organisations/uk-visas-and-immigration/about/complaints-procedure>

²³ 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 the process and can explain it to applicants.

²⁴ If the complaint alleged serious professional misconduct, UKVI would aim to respond to the complaint within 12 weeks.

- 4.51 Decision letters returned to applicants also invited them to complete an online anonymous customer satisfaction survey, telling UKVI their views of the service provided by Solihull PSC. Managers preferred the paper forms as they provided detailed feedback, allowing them to identify issues specific to service at Solihull PSC and how this could be improved.
- 4.52 The results of the surveys were collated monthly and feedback analysis discussed at local management meetings. Collating feedback regularly from the combination of sources allowed UKVI to identify and respond to issues as they occurred, which could facilitate the delivery of more effective premium services.
- 4.53 Although the customer service feedback we received on the day was generally positive, we identified one instance where this was not the case. Figure 6 refers to this case.

Figure 6: Case study – Application for Indefinite Leave to Remain

The applicant:

- booked an appointment online to attend Solihull PSC with their spouse and two dependent children, paying £5,972 (£1,493 per applicant);
- on 12 February 2015, submitted applications in person for ILR along with a range of supporting evidence;
- on the same day, was refused along with their dependents, solely because they had applied more than 28 days in advance of completing the five year qualifying period;²⁵ and
- on 4 March 2015, nearly three weeks later and now within the qualifying period, was granted ILR with their spouse when they reapplied in person at the PSC, having been required to make a further payment of £3,000.

Chief Inspector's comments:

- The applicant paid a total of almost £9,000, not including the additional fees still to be paid for their two dependents' re-applications, which were being submitted by post.
- These applicants had been allowed to proceed with and pay for their online applications despite the fact the applications were guaranteed to fail as they were not submitted within the qualifying period.

UK Visas and Immigration:

- maintained that some discretion was exercised in the applicants' favour by allowing them to apply for ILR within 28 days of the expiry of their existing leave to remain;
- stated that as the applicant had completed the correct application forms and fees were paid in advance of attendance at the PSC, the applications were considered valid; and
- added that these applications could not be rejected under paragraph 34 of the Immigration Rules, and a decision to either grant or refuse them had to be made following the appointment at the PSC.

- 4.54 It is the case that applicants applying for Indefinite Leave to Remain must show that they satisfy the relevant provisions of the Immigration Rules (in this case completing the relevant period of continuous leave), and there is no requirement under these Rules for UKVI to check that applications

²⁵ This runs either from the date on which the applicant entered the UK with a visa in the relevant category; or, if they did not enter the UK with such a visa, from the date on which they were first granted permission to remain in the UK in the relevant category. If the applicant entered the UK with a visa several weeks or more after the date from which it was valid for use, they may need to apply for an extension of stay to complete the relevant qualifying period.

²⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/420595/Immigration_rules_part_1_master_20150406_v1_final.pdf

are ready to be considered. However, in the 11 pages of guidance notes²⁷ that accompany the 84 page settlement application form,²⁸ it states only that an applicant ‘may’ be refused settlement if they apply more than 28 days before completing the qualifying period. Meanwhile, feedback provided to UKVI from applicants who had attended Solihull PSC²⁹ consistently referred to ‘lengthy’ and ‘confusing’ application forms.

- 4.55 It is also the case that applicants pay a higher fee for their application to be considered the same day regardless of whether the final decision is to grant or refuse their application. However, UKVI did not highlight clearly to applicants that they would lose the whole application fee, not just the premium service application fee, if they applied too early. Also, there were no cautions or warnings provided to applicants online prior to the payment being made about the consequences of applying too early. We questioned why the online booking system could not simply reject invalid applications that were made earlier than 28 days before completing the qualifying period.
- 4.56 We believe it is unreasonable that UKVI accepts payments online when there is no possibility that the application could ever succeed. With regard to the applicant in our case study, who had made a genuine mistake in relation to when they could submit their application, we believe that UKVI’s action in retaining the whole of the fee was disproportionate.
- 4.57 We asked UKVI to confirm whether there had been any other instances of applicants who had simply applied too early and were refused. UKVI reported that in 2014 there were 26 applicants who had been refused on this basis, at a total cost to the applicants of just under £40,000. We believe that UKVI should re-examine their handling of this issue and take action to ensure that applicants who make the mistake of applying too early do not lose the whole of their application fee. We therefore make the following recommendation.

Recommendation: The Home Office should:

Take action to ensure that:

- a technical solution is found to prevent premium service applicants from applying for Indefinite Leave to Remain (ILR) more than 28 days before completing the relevant qualifying period; or
- ILR applicants do not lose the whole of their application fee if they apply via the premium service before they have completed the relevant qualifying period.

²⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419181/SET_O_guidance_notes_04-15.pdf

²⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419183/SET_O_Version_04-15.pdf

²⁹ Survey results from March 2014 – February 2015.

5. Inspection Findings –Safeguarding Individuals

Treating applicants with dignity and respect

- 5.1 We observed PSC staff interacting with applicants politely and in a professional manner at all times. Applicants were treated with courtesy and respect at each stage of the premium service application process. Entry to the PSC did not involve a physical search, but the scheduling of security staff allowed for same gender searching of bags, if required.
- 5.2 We found no evidence of discrimination by staff when making decisions. Staff informed applicants of the decisions made on their applications, making sure they understood the process and what would be happening next. What we saw was in line with the results of surveys we conducted while on-site.
- 5.3 UKVI branding throughout the PSC was good and this included the smart appearance of uniformed staff. However, the branding outside the building consisted of an A4 laminated piece of card, which did not promote the image of a premium service. Better quality signage should have been provided for the building following the refurbishment, and this is something UKVI should be able easily to correct.
- 5.4 The public waiting areas had been refurbished in April 2014. They were smart and offered a welcoming environment to applicants. Facilities available included:
 - toilets with disabled access;
 - lowered counters for wheelchair users in the public area and biometric booths;
 - a nursing room for baby changing and feeding; and
 - private interview rooms, available on request.
- 5.5 Staff told us that while the open counters were more welcoming to applicants than the previous counters with security screens, they afforded no real privacy. However, biometric enrolment booths were available for use as private interview rooms if applicants were concerned about privacy.
- 5.6 Applicants we surveyed found the security, waiting and counter areas excellent in terms of cleanliness and comfort. There was a vending machine for the purchase of hot drinks and a television in the public area for those waiting for their appointments. Overall, applicants thought their experiences at the PSC were positive and some commented that they would recommend Solihull PSC to friends and family.
- 5.7 At Solihull, the facilities available were signposted on the notice board in the customer waiting area. On the GOV.UK website, the only information about facilities referred to all centres being accessible to wheelchair users. Staff told us that no concerns had been raised with them about the facilities available or lack of information about them on the GOV.UK website.
- 5.8 Staff told us that, although welcoming, the customer waiting area was small and could seat only 16 applicants, while they might have up to 40 appointments scheduled in a day. Once they had provided their biometrics details, applicants were therefore given the option of leaving while their application was being considered. Having taken their contact details, staff at the PSC would then inform them

when the decision was ready for collection. This ensured that applicants were not waiting at the PSC for long periods.

Handling of personal data

- 5.9 Government Security Classifications outline how personal data under the Data Protection Act 1998 should be protected. Such data is classed as 'OFFICIAL', and the minimum security controls for handling this information include:
- operating a clear desk policy;
 - all information securely locked away when not in use; and
 - a breach management system in operation.
- 5.10 We found that all staff had a good awareness of their responsibilities regarding the handling of personal data. Managers and staff told us that a clear desk policy was in place, with all files being put away when not in use. Failure to adhere to the clear desk policy was reflected in performance management meetings with individuals. We were further informed that there were regular security sweeps conducted by the operational manager at the end of each shift to ensure compliance with the process, and again by the site security staff before the building was closed.
- 5.11 However, we were concerned to find that the storage cupboards where applications containing personal documents (e.g. passports) were stored overnight had a faulty lock. When we raised this with managers, they responded that decision-making and file storage were in a secure part of the building with restricted access. UKVI subsequently informed us that the lock had been fixed and that personal data was now being stored appropriately and in line with Government Security Classifications.

Appendix 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.

Appendix B: Inspection Criteria

The criteria used in this inspection were taken from the Independent Chief Inspector's Inspection Criteria. Figure 7 refers.

Figure 7: Inspection criteria used for this inspection
Operational Delivery
1. Decisions on the entry, stay and removal of individuals should be taken in accordance with the law and principles of good administration.
2. Resources should be allocated to support operational delivery and achieve value for money.
3. Complaints procedures should operate in accordance with the recognised principles of complaint handling.
Safeguarding Individuals
4. All individuals should be treated with dignity and respect and without discrimination in accordance with the law.
5. Personal data of individuals should be treated and stored securely in accordance with the relevant legislation and regulations.

Appendix C: Glossary

Term	Description
A	
Administrative Officer	UKVI staff responsible for administrative tasks and basic decision-making.
Assistant Director	Senior manager within the 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	
Case Information database (CID)	Database containing details of all foreign nationals with whom the Home Office has come into contact, either through applications or enforcement.
Complaint	Dissatisfaction about the services provided by or for the Home Office/UKVI staff and/or about the professional conduct of Home Office/UKVI staff including contractors.
Customer	Anyone who uses the services of UKVI, including people seeking to enter the United Kingdom, people in detention and MPs.
Customer Service Excellence	The Government's customer service standard, which 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.
E	
e-Learning	Computer based training course.

Executive Officer	Lower management grade, including Officer and Immigration Officer. Senior to an AO.
H	
Higher Executive Officer	A management grade, senior to the Executive Officer. Equivalent grades exist within the Home Office, including Higher Officer and Chief Immigration Officer.
Home Office	The Home Office is the lead government department for immigration and passports, drugs policy, crime, counter-terrorism and policing.
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 either for a designated period, or permanently (indefinite).
P	
Premium Service Centre (PSC)	There are seven PSCs which offer same day services for a premium fee to non-European nationals making straightforward applications to settle in the UK, or for applicants in certain visa categories to extend their stay in the UK.
S	
Senior Executive Officer	A management grade, senior to HEO.
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, Immigration Enforcement and UK Visas and Immigration.
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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