



An Unannounced Inspection of the Cardiff Asylum Team

February 2014



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



I chose to inspect the asylum casework team in Cardiff because of my concerns about a backlog of asylum applications awaiting decision. I also examined the impact of a significant organisational change on the handling of these cases.

Staff in Cardiff were committed and took their responsibility to safeguard vulnerable individuals seriously. It was also encouraging to see the close cooperation between asylum, appeals and enforcements teams.

I found that the backlog of cases awaiting initial decision had grown because of a poorly managed change programme in 2013. This had led to the rapid loss of experienced staff before it was suspended last September.

In Cardiff, staff's main focus was on cases they believed could be decided within 30 days. Other cases were not being referred for interviews and decisions; instead they joined the backlog. This was unacceptable. All applicants have a right to expect a timely decision.

While the Home Office was reviewing its targets for asylum casework, I was disappointed this had not happened sooner, given that the issues I identified had been apparent for many months. Any new targets should be reviewed regularly and immediate action taken if they are resulting in unfair treatment for applicants.

The Home Office aims to clear the backlog by March 2015. This will be challenging, as it will require significantly more asylum decisions to be made in 2014 than have been made in recent years and with a less experienced workforce. I will return to this issue when I undertake a full inspection of asylum casework early next year.

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 Cardiff is one of ten non-detained asylum casework units across the UK.¹ It receives approximately 8% of the UK's annual non-detained asylum applications. In 2013, the UK received 23,507 such applications. We inspected the Cardiff team to gain an insight into the local challenges facing asylum teams, resulting from rising numbers of asylum claims and the impact of organisational change. Our primary focus was on the efficiency and effectiveness of case and resource management. We also looked at change management, proposals for new productivity targets and streamlined decision-making processes.

Positive findings

- 1.2 Staff and management were working towards the same objectives of managing new asylum applications through increased productivity and deciding older cases to help clear the backlog. We were informed that vulnerable individuals were always treated as a priority. We were pleased to find that the Cardiff asylum team took its responsibility to safeguard these applicants seriously.

Vulnerable individuals were always treated as a priority. We were pleased to find that the Cardiff asylum team took its responsibility to safeguard these applicants seriously

- 1.3 There were good communication links between asylum, appeals and enforcement teams in Cardiff. This was a result of previously working together in regional teams, as well as being located within the same building. It is particularly important for asylum casework to co-operate closely with enforcement teams, as they handle asylum removals. The Home Office should ensure that such close working between different Directorates is maintained.

There were good communication links between asylum, appeals and enforcement teams in Cardiff

- 1.4 Asylum casework had undergone a significant period of change in 2012-13. This included the creation of a new national, as opposed to regional, structure and proposals to replace asylum case-owners, responsible for all aspects of a case, with staff at a generally more junior grade, whose focus would be on conducting interviews and making decisions. Local managers were praised by staff for the support they had provided to them during this period of transition.
- 1.5 In our recent report on unaccompanied asylum-seeking children, we raised concerns about previous Home Office plans to raise productivity targets for staff, without adequate consultation or analysis.² We were therefore pleased to find that more recent proposals to revise targets and to improve efficiency had been developed in close consultation with staff.

¹ Folkestone, Croydon, London, Cardiff, Solihull, Liverpool, Leeds, Newcastle, Glasgow and Belfast.

² <http://icinspector.independent.gov.uk/wp-content/uploads/2013/10/An-Inspection-into-the-Handling-of-Asylum-Applications-Made-by-Unaccompanied-Children-FINAL.pdf>

Areas for improvement

- 1.6 Proposals to restructure asylum casework announced in early 2013 were suspended in September 2013. This followed the loss of significant numbers of experienced staff, which meant that the Cardiff team lost 43% of its case-owners. Due to this, and a failure to recruit new caseworkers sufficiently quickly, the number of new applications received exceeded the number of decisions made, from the summer of 2013 onwards. A national backlog of 13,628 cases awaiting an initial decision developed by the end of 2013 (773 of these cases were in Cardiff), a 38% increase on 2012. Of these, 6,249 had been awaiting a decision for more than six months, 352 in Cardiff alone.
-
- A national backlog of 13,628 cases awaiting an initial decision developed by the end of 2013*
-
- 1.7 One of the key drivers of productivity amongst staff in Cardiff was the objective of making decisions within 30 days. However, as asylum intake continued to exceed the team's capacity to make decisions on existing claims, not all applications could be decided within this period. As a result, staff considered that their focus should be on cases they believed could be decided within 30 days, leaving other, often more complex cases, to be dealt with later. We were concerned that cases which were assessed as unlikely to meet the 30-day target faced joining the growing backlog of cases awaiting decision, with little certainty for applicants as to when their claims would be resolved.
- 1.8 In addition, we identified that applicants whose cases were not referred to the Cardiff asylum team in a timely manner from the Asylum Screening Unit potentially lost the opportunity for a quick decision, through no fault of their own. This was unacceptable from a customer service point of view. At the time of inspection, we were informed that the 30-day performance indicator was under review. Given that the number of cases awaiting initial decision had been growing since the summer of 2013, we were disappointed that the Home Office had not undertaken this review earlier.
-
- We were concerned that cases which were assessed as unlikely to meet the 30-day target faced joining the growing backlog*
-
- 1.9 Of the 50 asylum cases sampled by the Home Office's Quality Assurance Team (QAT) between April and December 2013, 64% (32) were found to contain 'serious errors' in the process. However, of the refusal decisions, 14 of the 18 cases criticised by the QAT were upheld on appeal. Given that immigration judges are the ultimate arbiters of decision quality, we consider that the national quality assurance framework should be aligned more closely with the standards of decision-making that the courts expect to see in asylum cases.
- 1.10 The previous change programme had left a legacy among staff of ill-feeling towards senior managers, which was still apparent when we inspected Cardiff. The Home Office must draw lessons from its poor management of that change to avoid similar mistakes in future. The Home Office's long-term aim was to eliminate the backlog of cases awaiting initial decision by April 2015; it additionally wanted to ensure that almost all applicants would receive a decision within six months. However in order to achieve this, decisions would have to be made in 32,000 cases in 2014-15, a 60% increase in productivity compared with recent years, and with a less experienced workforce. These targets appeared challenging. We intend to examine whether they have been met when we conduct a full inspection of asylum casework in early 2015.
-
- The Home Office must draw lessons from its poor management of change to avoid similar mistakes in future*
-

2 - Summary Of Recommendations

We recommend that the Home Office:

1. Decides all asylum applications within its published service standards and informs applicants where it is unable to do so.
2. Ensures that future targets for deciding asylum claims are regularly reviewed and takes immediate action if it identifies that they are resulting in unfair treatment of applicants.
3. Evaluates its previous asylum casework change programmes in order to improve its management of future change.

3. THE INSPECTION – METHODOLOGY AND BACKGROUND

Scope / methodology

- 3.1. The purpose of the unannounced inspection was to examine the efficiency and effectiveness of case and resource management by the Cardiff Asylum Team. Five of the Independent Chief Inspector's inspection criteria (see Appendix 2) were used to examine performance, grouped under the themes of:
 - Operational Delivery;
 - Safeguarding Individuals; and
 - Continuous Improvement.
- 3.2. The inspection took place in response to issues identified during our recent inspection of asylum support. This identified increasing numbers of asylum claims awaiting casework action and stakeholder concerns about a growing number of asylum applications awaiting an initial decision. We decided to inspect Cardiff to obtain an insight into the challenges facing asylum teams at a local level.
- 3.3. We examined the management of new asylum applications and the steps being taken to reduce the number of cases awaiting initial decisions. We also reviewed the handling of a change programme in 2013 which introduced changes to the way in which asylum claims were managed. This saw a transition from the New Asylum Model (NAM) – where a 'case-owner' managed all aspects of an asylum claim – to one where 'decision-makers', normally at a more junior grade, focused on conducting interviews with applicants and making decisions. Within this review, we looked at future proposals to increase the efficiency of the Asylum Casework Directorate (ACD) and their potential impact on the Cardiff team and wider asylum casework.
- 3.4. As this was an unannounced inspection, we did not sample asylum decisions made in Cardiff. Instead, we looked at the management of asylum cases, including the issue of targets and efforts to reduce the number of cases awaiting an initial decision. We also examined quality assurance mechanisms in place nationally and the Quality Assurance Team's (QAT) assessments of decision quality in Cardiff.
- 3.5. The inspection of Cardiff took place on 13 February 2014. We conducted interviews with ACD staff and managers. We also interviewed appeals staff and an ACD senior manager at a later stage. A breakdown of the staff we spoke to is set out in Figure 1.

Figure 1: Home Office staff interviewed during the inspection	
Administrative Officer	4
Executive Officer	8
Higher Executive Officer	8
Senior Executive Officer	1
Assistant Director	2
Senior Civil Service	1
Total	24

3.6. We also requested the following management information:

- performance information from 1 January to 31 December 2013, both nationally and directly relating to the Cardiff team;³
- previous and current ACD change proposals;
- change communications between ACD senior management and staff; and
- staff survey results for ACD and the Cardiff asylum team.

3.7. On 28 February 2014, we provided feedback on high-level emerging findings to the Home Office. The inspection identified three recommendations for improvement.

3.8. The final version of this report was submitted to the Home Secretary for publication on 25 April 2014.

Background

What is asylum?

- 3.9. Asylum is protection given by a country to a foreign national who has fled persecution in their home country. The UK is a signatory to the 1951 United Nations Convention relating to the Status of Refugees ('the Refugee Convention'), which sets out the basis on which a person is considered to be a refugee. The Convention states that a refugee is a person who has a well-founded fear of persecution by reason of his race, religion, nationality, membership of a particular social group, or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country.
- 3.10. A person can also apply to remain in the UK on the basis that they require humanitarian protection. A person will be granted humanitarian protection if they do not qualify as a refugee but can show that there are substantial grounds for believing that, if they were returned to their country of origin, they would face a real risk of suffering serious harm. The definition of serious harm is the death penalty, torture or inhuman or degrading treatment or punishment, or a serious and individual threat to a person's life or safety in situations of armed conflict.
- 3.11. A person can also apply to remain in the UK on the basis that removal would breach their rights laid down in the 1950 European Convention on Human Rights (ECHR). The convention contains a number of 'articles' of protected rights. Most human rights claims are based on Article 3 (prohibition of torture and inhuman or degrading treatment) or Article 8 (right to respect for family life and private life). A human rights claim can be part of an asylum claim under the Refugee Convention, or

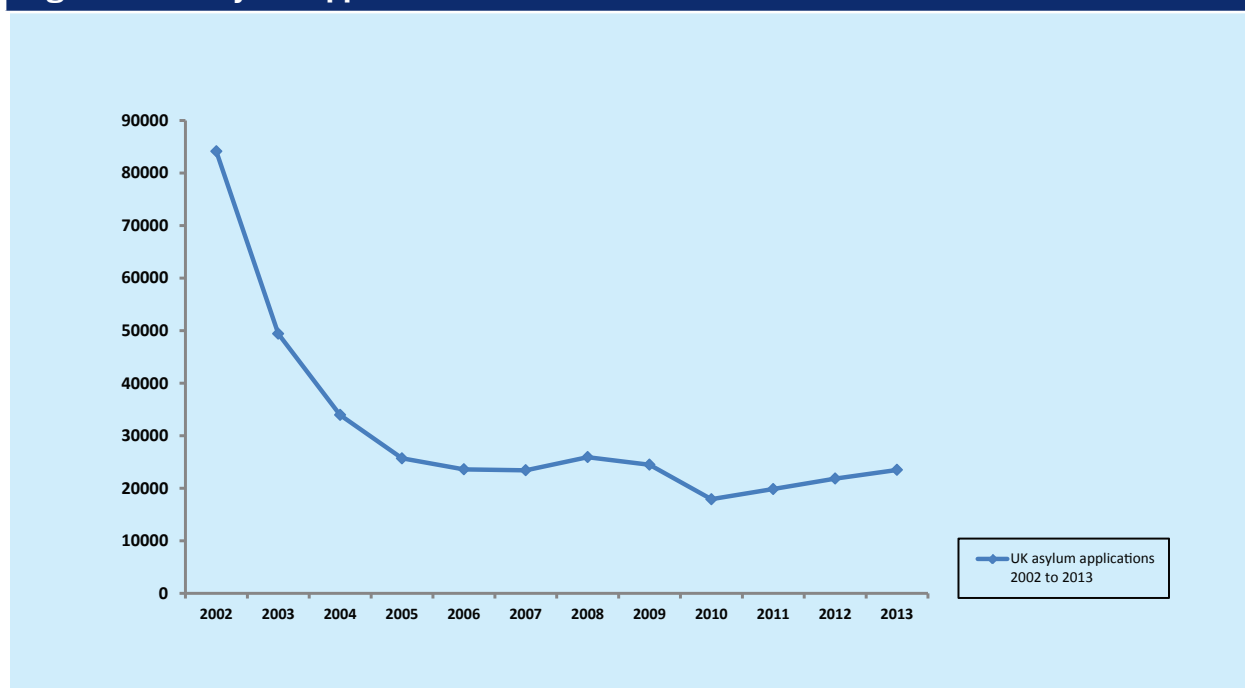
³ We were unable to obtain data for January and February 2014, as the latest version of published statistics at the time of this inspection only covered up to 31 December 2013.

it can be made in its own right if it is not a claim for protection.

Asylum intake in the UK⁴

- 3.12. Asylum applications in the UK rose throughout 2013, with 23,507⁵ applications received in the UK, an 8% (1,664) increase on 2012. This increase was part of a trend of steadily rising asylum applications from 17,916 applications in 2010, to 19,865 in 2011 and 21,843 in 2012. However while the number of applications was almost back at the 2009 level of 24,487, this was still far short of the peak of 84,130⁶ applications in 2002, as shown in Figure 2.

Figure 2: UK asylum applications 2002 - 2013



- 3.13. In evidence to the Home Affairs Select Committee in the autumn of 2013, the Home Office anticipated that intake by April 2014 would be 30% higher than in 2010.⁷ Managers told us that this overall increase of intake was being driven by rising numbers of applications from the Middle East, following the Arab Spring and the civil war in Syria, as well as more claims from nationals of countries such as Albania.

Cases awaiting an initial decision

- 3.14. The number of asylum claims awaiting an initial decision had also increased in the period since 2010. However this growth accelerated significantly in 2013, with 13,628 asylum applications awaiting an initial decision at the end of 2013 – 38% more than at the end of 2012 (9,871). Of these cases, 6,249 had been awaiting a decision for more than six months (46%), as shown in Figure 3.

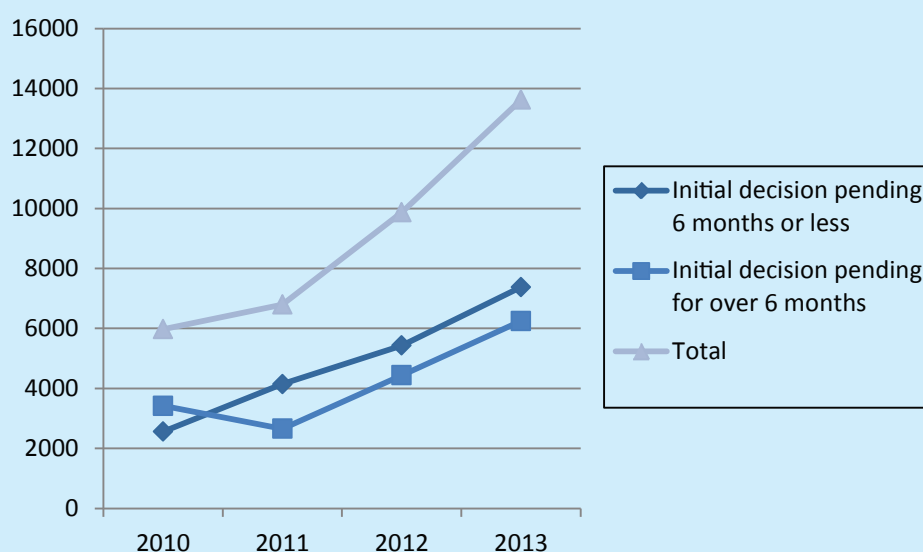
4 New applications for asylum.

5 <https://www.gov.uk/government/publications/immigration-statistics-october-to-december-2013/immigration-statistics-october-to-december-2013>

6 <http://www.publications.parliament.uk/pa/cm200304/cmselect/cmhaff/218/218.pdf>

7 <http://www.parliament.uk/documents/commons-committees/home-affairs/Cm%208769%20Asylum%20Government%20Response.pdf>

Figure 3: UK asylum applications waiting for an initial decision



The break-up of the UK Border Agency

- 3.15. Following the break-up of the UK Border Agency (the Agency) on 31 March 2013, two new directorates were created to handle its immigration work. UK Visas and Immigration (UKVI) handles applications for leave to enter or remain in the UK made either from overseas or from within the UK, including asylum claims. Immigration Enforcement is responsible for ensuring that people who fail to comply with UK immigration laws are apprehended and removed from the UK.

UKVI restructuring

- 3.16. In May 2013, UKVI moved away from the regional, multi-functional 'Local Immigration Team' structure of the former Agency and created a series of national commands for key functions within the immigration process. As part of this process, a National Asylum Command, later renamed the Asylum Casework Directorate (ACD), was created.⁸ Similar central commands were set up for appeals, removals casework and enforcement. The primary aim was to ensure greater consistency, as the previous regional structures had made it more difficult to implement national priorities.
- 3.17. The creation of the ACD was accompanied by proposals for a new asylum operating model. This removed the single case-owner approach (NAM) and envisaged that asylum decisions would be made by staff at Executive Officer (EO) rather than Higher Executive Officer (HEO) level. The Home Office told us that the decision-making role was re-graded because the remit was a narrower one, and would no longer require decision-makers to represent the Home Office at appeal hearings. We comment further later in the report on the impact of these proposals on staff retention and productivity.
- 3.18. Senior managers decided to put the proposed restructuring on hold in September 2013. This was following the loss of experienced staff and the uncertainty that had been caused as a result of the restructuring announcement.

⁸ At the time of inspection the ACD had retained responsibility for all asylum casework, including non-detained, Detained Fast Track (DFT) and Third Country Unit (TCU) cases. The ACD also dealt with further submissions made on asylum cases that had been through the appeals process, known as post-appeal-rights-exhausted (post-ARE) cases. In addition, ACD had responsibility for asylum support functions, Home Office travel documents and refugee integration.

Cardiff Asylum Team

3.19. Cardiff is one of ten non-detained asylum casework units across the UK. It receives approximately 8% of the UK's annual non-detained asylum intake at any one time. By the end of December 2013, the largest numbers of applications handled in Cardiff were from nationals of:

- Iran (Islamic Republic of) (194);
- Syria Arab Republic (162);
- Eritrea (125);
- Pakistan (116);
- Sri Lanka (86);
- Sudan (76); and
- Bangladesh (72).

This distribution broadly reflected national intake.⁹

3.20. The Cardiff asylum team was led by an Assistant Director and a breakdown of the staff by grade at the time of inspection is set out in Figure 4.

Figure 4: Staff numbers in the Cardiff Asylum Team

Administrative Assistant	1
Administrative Officer	8*
Executive Officer	12**
Higher Executive Officer	13
Senior Executive Officer	1***
Assistant Director	1***
Total	36

*Figure includes three Agency staff.

** Figure includes one acting EO.

***Figure includes an acting SEO and Assistant Director.

⁹ In 2013 the largest numbers of applications for asylum were from nationals of Pakistan (3,343), followed by Iran (2,417), Sri Lanka (1,808), Syria (1,669), Eritrea (1,377) and Albania (1,326).

4. INSPECTION FINDINGS – OPERATIONAL DELIVERY & SAFEGUARDING INDIVIDUALS

Decisions on the entry, stay and removal of individuals should be in accordance with the law and the principles of good administration.

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

Cardiff Asylum Team priorities

- 4.1 Staff at Cardiff told us they had two main objectives. These were to:
- manage new asylum intake by increasing current productivity targets, and
 - decide older cases that had not had initial decisions, to help clear a growing backlog.
- 4.2 Both of these objectives were with a view to helping ACD reduce asylum support costs, clear backlogs and improve customer service. Senior managers were confident that this would be achieved by March 2015.

Delivery of objectives

- 4.3 As of December 2013, Cardiff had 773¹⁰ cases that were still awaiting initial decisions. This represented 6% of all such cases nationally. This compared favourably with national performance, given that the Cardiff asylum team was expected to deal with approximately 8% of non-detained asylum intake at any one time.
- 4.4 The short-term priority set by managers was for Cardiff to decide all their applications that had been made before 2011 by March 2014. Staff understood this and were working towards this objective. They were also generally supportive of senior managers' intention to deal with the backlog of older cases.
- 4.5 In relation to the management of new intake, we found that the key driver for staff was the objective of making decisions within 30 days. This target was first introduced in 2007 with the rollout of the NAM. At that time, achieving this target contributed to meeting the over-arching objective to conclude 90% of cases within six months of the original application date.¹¹

We found that the key driver for staff was the objective of making decisions within 30 days

¹⁰ Figures for January – February 2014 were not available at time of inspection.

¹¹ See paragraph 1.22 of http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Asylum_Getting-the-Balance-Right_A-Thematic-Inspection.pdf

- 4.6 In December 2010, the six-month conclusion target was replaced with a series of 15 Key Performance Indicators (KPI) to monitor how the former Agency was performing in asylum cases. While asylum intake and the number of cases awaiting decisions¹² were key performance measures, another important performance measure remained the percentage of cases that received an initial decision within 30 days. These performance measures¹³ remained in place at the time of our inspection.

Significance of the 30-day target

- 4.7 In order to meet the 30-day target, staff told us that certain case types such as vulnerable individuals, those with travel documents and ‘probable grants’ (generally, cases that were likely to have quick interviews and decisions) were always given priority. Others (such as high-cost asylum support cases) were only prioritised when tasked. However, the 30-day target remained a key driver of behaviour in Cardiff. This was evidenced further by staff informing us of the existence of a 30-day initial decision team, and a 30-day decision target featuring in staff’s personal objectives. Staff also told us that if necessary they would be moved into the 30-day team to meet this target.
- The system was not in balance at the time of our inspection*
- 4.8 Senior managers informed us that the 30-day target only worked when the system was in balance (that is, backlogs had been eliminated and the number of decisions being made was equal to the number of new applications). Otherwise, it could cause ‘perverse behaviour’, with staff focusing on deciding cases that could potentially meet the target and leaving others to be dealt with later.
- 4.9 The system was not in balance at the time of our inspection, caused in part by insufficient resources. Intake was also exceeding the number of decisions made and had been so throughout the second half of 2013 – Figure 5 refers. Although figures for the first quarter of 2014 were not available at the time of our inspection, staff and managers both told us that the number of cases awaiting initial decision was continuing to rise. However, given that the target continued to feature among ACD’s KPIs and on performance dashboards, we were not surprised that the Cardiff team was continuing to focus on it.
- Intake was also exceeding the number of decisions made*

Figure 5: Asylum intake vs initial decisions in Cardiff

Month	Intake	No of initial asylum cases decided
April 2013	125	119
May 2013	114	158
June 2013	117	124
July 2013	140	140
August 2013	131	103
September 2013	144	109
October 2013	146	131
November 2013	185	82
December 2013	160	83

Data provided by UKVI.

¹² Cases awaiting initial asylum decisions and those that are un-concluded through either a grant of leave or removal from the UK fall within the ‘Work in Progress’ (WiP) cases.

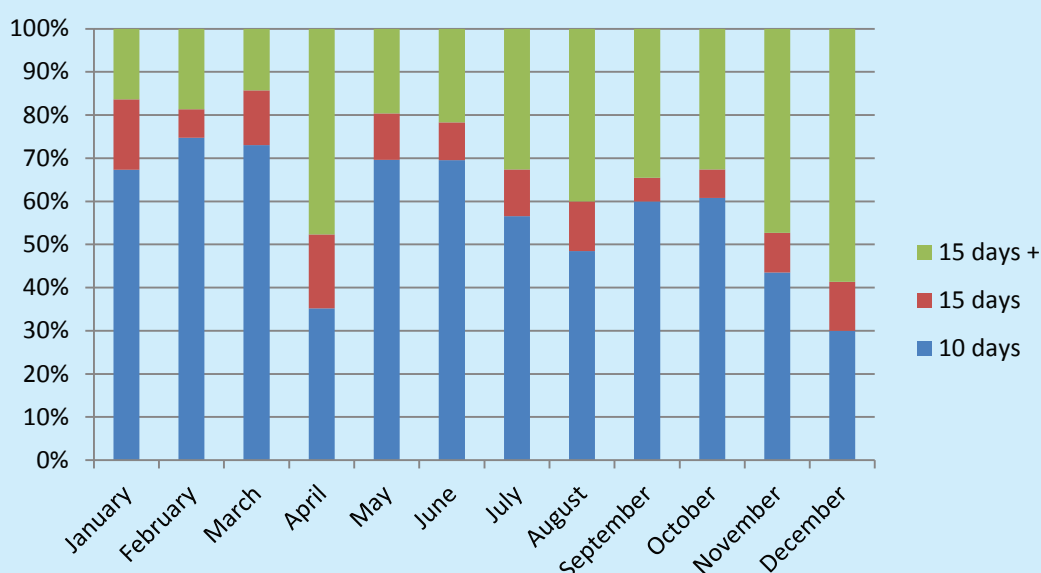
¹³ Performance against these indicators is published annually on the Home Office website <https://www.gov.uk/government/collections/migration-transparency-data>

4.10 We were concerned at the potential consequence for applicants if their case was assessed as unlikely to meet the 30-day target. Staff suggested that applications that did not fall within existing priorities or that were not assessed as potential 'quick wins' might not be referred through for interview to inform the initial decision.

We were concerned at the potential consequence for applicants if their case was assessed as unlikely to meet the 30-day target

4.11 Other cases that missed the 30-day initial decision target were those cases that were not referred to the Cardiff Asylum Team in a timely manner by the Asylum Routing Team. For example, in late 2013, a high proportion of cases were routed late to Cardiff. As asylum applicants were normally given two weeks' notice of interview, following which a decision was made, these delays meant that it was impossible for the Cardiff Asylum Team to meet the 30-day target in many of these cases – Figure 6 refers.

Figure 6: Percentage of asylum cases received by Cardiff within 10, 15 and 15+ days from the date of claim in 2013.



4.12 The delay in routing cases to the Cardiff Asylum Team meant that applicants potentially lost the opportunity for a quick decision to be made on their case, through no fault of their own. Staff told us that unless representations were made showing that the applicant was vulnerable, or needed to be interviewed for a particular reason, a timely interview would not be scheduled.

The delay in routing cases meant that applicants potentially lost the opportunity for a quick decision to be made on their case, through no fault of their own

4.13 From a customer service point of view this was unacceptable. The fact that the handling of a case could be adversely affected by such a target/performance measure is a significant concern. At a time when intake was exceeding output, it was especially unlikely that the cases would be looked at in a timely manner. The impact of this, as well as the prioritisation of cases identified as capable of being decided within the 30-day target, are discussed in the next section.

Treatment of vulnerable applicants

- 4.14 We were pleased to find that the Cardiff asylum team treated vulnerable individuals as an absolute priority. All staff were alive to the importance of dealing with their cases in an appropriate manner. Staff stressed that deciding applications should not be treated as a 'tick-box exercise' or 'just a target'.
-
- Cardiff asylum team treated vulnerable individuals as an absolute priority*
-
- 4.15 All staff had completed the mandatory equality and diversity training, and this was confirmed by managers. They also confirmed that staff had received the relevant training in relation to identifying and dealing with vulnerable/specialist cases. If there were any medical circumstances raised, such as pregnancy, then an applicant could request that their interview be expedited. Safeguarding individuals also featured on both the national and local risk registers.
- 4.16 The Cardiff asylum team took its responsibility to safeguard vulnerable applicants seriously. However, we were concerned that its approach of prioritising cases identified as capable of being decided within the 30-day target due to lack of resources, was potentially discriminating against applicants whose cases were considered more difficult to decide. Senior managers told us that ACD had to 'make prioritisation choices', especially at a time when there were insufficient resources to meet the 30-day target in all cases. However, they did not believe that this would lead to a discriminatory approach by staff.
-
- We were concerned that its approach of prioritising cases was potentially discriminating against applicants whose cases were considered more difficult to decide*
-

Review of the 30-day target

- 4.17 Following the on-site phase of our inspection, we became aware that senior managers had decided to review the 30-day target. This was because ACD's performance against it was poor and had resulted in cases being 'de-prioritised' once they passed the 30-day point. In light of our concerns about the impact the target was having on the handling of asylum applications, we make the recommendation below.
- 4.18 We were concerned that the decision to review the 30-day target was only taken in early 2014. The failure to review the target earlier meant that applicants who did not fit within ACD's priorities were much less likely than others to get a timely decision on their claims. This risked causing applicants uncertainty about their future status, and adding to asylum support costs. In addition, future removals of those whose asylum claims fail could be more challenging, as they might have built up Article 8 ECHR family and private rights in the UK. We therefore make the following recommendation:

We recommend that the Home Office:

- Decides all asylum applications within its published service standards and informs applicants where it is unable to do so; and
- Ensures that future targets for deciding asylum claims are regularly reviewed and takes immediate action if it identifies that they are resulting in unfair treatment of applicants.

Quality assurance

- 4.19 We found that all new decision-makers in Cardiff had 100% of their decisions checked. We were also told that the mentoring system, where an experienced senior decision-maker assisted a new member of staff, was working well in Cardiff.
- 4.20 One of the key risks identified by staff and recognised as such by senior managers was that ‘challenging’ productivity targets could compromise decision quality if they became too demanding.¹⁴ Staff were extremely passionate about the need to get decisions right and balance quality with quantity.
-
- Staff were extremely passionate about the need to get decisions right and balance quality with quantity*
-
- 4.21 From June 2013 onwards and at the time of inspection, Cardiff caseworkers had a productivity target of five events per week, with an event being defined as:
- a substantive asylum interview; or
 - a decision (e.g. a grant of asylum/ humanitarian protection/restricted/ discretionary leave or a refusal).
- 4.22 There were three main ways in which asylum decisions could be quality assured:
- at a local level through local management;
 - by the Home Office Quality Assurance Team; and
 - through appeals analysis.
- 4.23 Productivity targets were adapted for new staff members, starting on three events per week, moving up to five events for more experienced decision-makers. We were told that processes were in place to check complex cases. However, we found that the lack of a senior caseworker in Cardiff meant that decisions made by HEO decision-makers were not routinely subject to local quality assurance checks. We were told a new senior caseworker was in the process of being appointed. We believe this role is vital at a time when the Cardiff Asylum Team has a significant number of new and inexperienced casework staff.
- 4.24 The QAT looked at 5% of cases across each casework team. For Cardiff this equated to 50 cases sampled for the period April-December 2013. Nearly two-thirds of these cases (32 cases - 64%) were classified by the QAT¹⁵ as having ‘serious errors’ in the process (14 grants and 18 refusals). For each quarter during this period, Cardiff’s error rate was above the national average. For example, of the 15 cases sampled for October-December 2013, nine (60%) were considered ‘weak’ or ‘fail’¹⁶ compared with a national average of 42%.
- 4.25 We noted, however, that of the 18 refusal cases that were deemed to have serious errors by the QAT, 14 of these were subsequently upheld at appeal. While accepting that a serious error does not necessarily equate to an incorrect decision, the courts are the ultimate arbiters of decision quality. We share staff views that the internal quality assurance framework is potentially too exacting and would benefit from review.

14 UKVI indicated that from October-December 2013, a FTE caseworker exceed their 5 event target only 18 times. Performance, however, improved significantly in January, when despite fewer FTE caseworkers being available than in any of the previous 3 months, the 5 event target was exceeded 7 times.

15 The error hierarchy within this framework is ‘critical’, ‘serious’, ‘minor’ and ‘correct’. A serious error is one that ‘does not fully adhere to legislation and/or process and/or policy, which has led to a fundamental error, and to the Home Office being exposed to potentially significant levels of risk, for example to reputation or resources.’

16 A ‘weak’ decision is defined as a decision which has ‘one or more material [e.g. factual] errors’. A fail means there was ‘one or more critical errors’.

- 4.26 If decision-making processes are to be streamlined, then the quality assurance framework will need to be adapted to reflect this. Improving efficiency must not be achieved at the expense of quality. However, we consider that there is room to adapt the current framework to align it more closely with the standards of decision-making that immigration judges expect to see in asylum cases. We were pleased, therefore, that ACD senior managers were actively considering the future of the quality assurance framework at the time of our inspection. For this reason we make no further recommendation here.

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

Cases awaiting initial decision

- 4.27 As discussed earlier, the number of cases awaiting decision was continuing to increase, nationally and in Cardiff, at the time of inspection. A major reason for the emergence of this backlog was that the restructuring of ACD in 2013 had resulted in the rapid loss of large numbers of HEO 'case-owners' before new EO 'decision-makers' could be recruited and trained.

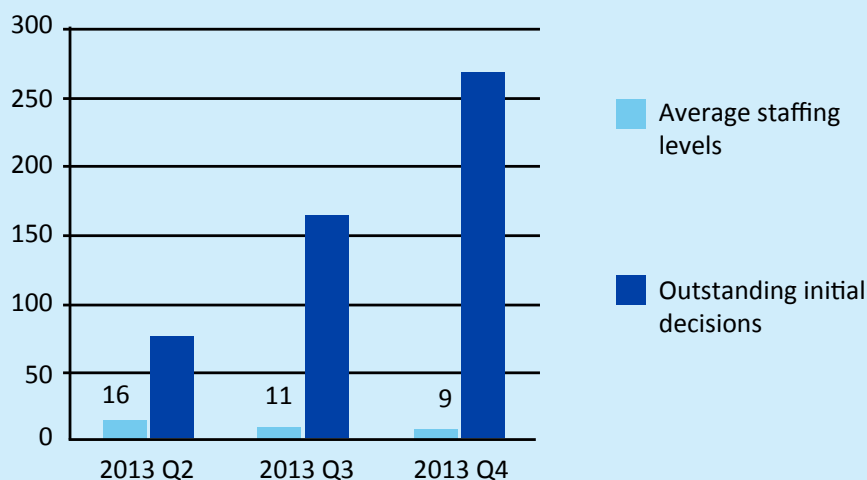
- 4.28 We also noted that almost half of the cases in the Cardiff asylum team awaiting decisions, were ones where the applications were more than six months old (352 cases - 46%). In percentage terms, this reflected the national pattern. The significance of this is that one of ACD's objectives is to clear the older cases currently in the system, as well as the new intake, so that almost all cases awaiting an initial decision will be less than six months old by April 2015. We comment further on this issue later in the report.

Almost half of the cases in the Cardiff asylum team awaiting decisions, were ones where the applications were more than six months old (352 cases - 46%).

Cardiff Asylum Team resourcing

- 4.29 Cardiff had lost fewer case-owners than some other asylum teams during 2013. Nonetheless, the number of HEO decision-makers had still fallen by 43% from 17.4 to 9.89 full-time equivalent staff between June and September 2013, when the proposed restructuring was suspended. When we inspected the team in February 2014, there were still just under 10 FTE HEOs in post.
- 4.30 Nationally, a significant number of HEO case-owners left to take up other posts when the restructuring was announced. This resulted in a significant reduction in asylum decision-making capacity across the Home Office. For example, in the period June-September 2013, while the EO caseworker figures slightly increased from 149 to 160 the HEO caseworker headcount figures dropped significantly from 232 to 181. While rising intake will have contributed to an increase in the number of cases awaiting an initial decision, the lack of resources was the most significant cause for the increase in number of cases awaiting initial decision – Figure 7 refers.

Figure 7: Staff in Cardiff vs cases awaiting decision



Productivity and targets

4.31 We noted that the rise in the number of cases awaiting an initial decision occurred despite the fact that staff in Cardiff, and nationally, continued to meet individual productivity¹⁷ targets throughout the period before the proposed restructuring was put on hold. The development of the backlog was therefore a direct result of the loss of HEOs, not a consequence of a dip in productivity among staff who remained in post.

The development of the backlog was therefore a direct result of the loss of HEOs

4.32 Decision-makers had a target of undertaking five events, defined as interviews or decisions, a week. Both managers and staff described the five-event target as 'challenging'. This was despite previous proposals by senior managers, since withdrawn, to move to an interim target of 7.5 events per week with a view to eventually moving to a 10-event target.

4.33 Subsequent to the on-site phase of our inspection, an email was sent by senior management to all staff in ACD setting out proposed targets for 2014/15:

- Staff would generally have a minimum target of 225 events per annum (based on a working year of 191.5 days). The effect of this was that caseworkers would be expected to complete slightly more than 1 event per day;
- In addition, managers would be given output targets which their teams would be expected to meet, and for which they would be accountable; and
- The new targets were to be achieved by building further efficiencies into the processes, for example, streamlining decision-making. Targets were also reliant on the recruitment of staff to undertake administrative tasks, thereby freeing up caseworkers to focus on interviews and decisions.

4.34 We commented in a previous inspection report¹⁸ on the potential risks of moving to targets of 7.5 and 10 events per week in the context of restructuring and with an EO rather than HEO workforce.

¹⁷ Productivity = the Total No. of Events (Interview + Decisions + Appeals) divided by (Attendance FTE minus No of Days Attended but Unavailable (FTE days) Further Submissions & Non Further Submissions).

¹⁸ <http://icinspector.independent.gov.uk/wp-content/uploads/2013/10/An-Inspection-into-the-Handling-of-Asylum-Applications-Made-by-Unaccompanied-Children-FINAL.pdf>

We note that the new target of 225 events per year is close to the current five-event target and that it has been proposed following extensive operational modelling and consultation with managers and staff. We do not consider that the new target is unrealistic, although the Home Office must ensure that it is not achieved at the expense of decision quality. We do, however, have some concerns about the Home Office's ability to clear the backlog of older cases and to get the system back into balance by the spring of 2015. We comment further on this later in the report.

We do not consider that the new target is unrealistic, although the Home Office must ensure that it is not achieved at the expense of decision quality

Simplification of roles

- 4.35 The new targets for 2014-15 are part of a wider asylum casework transformation plan that has been proposed by senior managers. One of the key ways in which this programme aims to increase productivity is by stripping away administrative tasks from caseworkers. We found that decision-makers welcomed this.
- 4.36 In Cardiff, this included proposals to:
- use the Administrative Team to review applications and complete initial compulsory checks before they were allocated to decision-makers, freeing up time to focus on interviews and decisions;
 - establish a general enquiry line for casework queries; and
 - have teams that focused on older cases and others that concentrated on making decisions on new applications.
- 4.37 We were told that some areas of work had fallen through the gaps during the transition process in Cardiff. For example, the setting-up of reporting for asylum applicants and sending out letters to applicants who had become overstayers. This was partly a consequence of the fact that decision-makers were being encouraged to concentrate solely on interviews and decisions. It was also, in part, a result of the division between UKVI, of which asylum casework is a part, and Immigration Enforcement, which is responsible for the removal of those whose claims fail.
- 4.38 Senior managers recognised this and informed us that the need to ensure that the correct action was taken on all aspects of a case would be covered in training. They shared our view that the transformation programme would not work unless decision-makers, administrative staff, presenting officers and enforcement staff continued to work closely in handling different aspects of individual cases.

Some areas of work had fallen through the gaps during the transition process in Cardiff

Split of responsibilities between HEO and EO decision-makers

- 4.39 As a result of the suspension of the move from the HEO to the EO caseworker model in September 2013, Cardiff, like other areas of asylum casework, had two different grades potentially undertaking the same role. In a communication to staff in December 2013, ACD senior managers set out how they envisaged the split would work in practice: HEOs would act as senior decision-makers and be responsible for more complex cases, while EOs would make decisions on other cases.¹⁹ For example, we were told that one of the ways in which EO and HEO roles were split was that HEOs were nominated as leads for sensitive cases. At the time of inspection, the Cardiff asylum team had 11 Senior Decision-maker leads at HEO level, including leads for trafficking, medical foundation and minors cases.

¹⁹ Subject to approval through the Home Office's job evaluating and grading system, which assesses at what level a particular role should be graded.

4.40 Senior management envisaged a future workforce where 30 per cent of decision-makers were HEOs and 70 per cent EOs, to reflect the proportion of cases that were complex and those that were less so. In a message to staff in December 2013,²⁰ the Director of Asylum set out definitions for the HEO and EO decision-making roles, and how the different case types would be split between the two roles. We found, however, that staff in Cardiff were concerned that the definition of a 'complex case' was still not clear. They told us that this had resulted in some confusion in terms of the allocation of cases to HEOs and EOs and had also led to some local disagreements as to whether cases were or were not complex. Senior managers need to do more to ensure that all staff understand the definition of the term 'complex' and are aware of which cases should be allocated to senior HEO decision-makers and which should be dealt with by decision-makers at the EO grade.

20 Asylum Casework directorate – Workforce and Capacity Planning December 2013.

5. INSPECTION FINDINGS – CONTINUOUS IMPROVEMENT

The implementation of policies and processes should support the efficient and effective delivery of border and immigration functions.

Previous plans for restructuring of asylum casework

- 5.1 Staff considered that the ACD restructuring programme had been poorly managed and executed, and that communication had been poor. Some staff commented that ‘communication was dreadful’ and that the ‘change process had been happening for a long time’.
-
- Staff considered that the ACD restructuring programme had been poorly managed and executed*
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- 5.2 Although senior managers had suspended the restructuring programme in September 2013, staff still raised these issues with us when we visited Cardiff five months later. This reflected a legacy of ill-feeling and made it more challenging for ACD senior managers to persuade staff of the merits of their more recent change proposals.
- 5.3 The 2013 staff survey results for the Home Office region that included the Cardiff Asylum Team confirmed that staff lacked confidence in senior management, and in particular in their ability to manage change:
- 6% of staff had confidence in the decisions made by UK Visas and Immigration’s senior managers;²¹
 - 0% of staff felt that change was managed well in UK Visas and Immigration;²² and
 - 0% of staff thought that when changes were made in UKVI they were usually for the better.²³
- 5.4 Staff informed us that they had not been consulted on the original proposals to change the asylum operating model in 2012-13. When consultation did occur, this happened only after the Home Office had already begun implementing the proposed changes.
- 5.5 Staff were, however, much more positive about the support they had received from local managers in Cardiff during the restructuring programme. This was reflected in the 2013 staff survey results, with 78% expressing confidence in decisions made by local managers and 72% considering that local managers helped motivate them to be more effective in their jobs.
- 5.6 In September 2013, the Director of Asylum informed staff that the formal grade restructuring process would be suspended following the loss of experienced staff. This decision was with a view to stabilising the situation and ‘preparing the ground to achieve consistent competence’.²⁴ We welcomed

²¹ This was 10% lower than ACD overall.

²² This was 12% lower than ACD overall.

²³ This was 9% lower than ACD overall.

²⁴ Email to UKVI staff from the Director of Asylum 17 January 2013

this decision in a recent report, as we considered that the previous plans had been over-ambitious and had carried significant risks.²⁵

Change communication and change management

- 5.7 Staff in Cardiff considered that communication on change had improved following the suspension of the restructuring process in September 2013. They received regular communications from senior managers in relation to the new ACD Change Programme, and also saw evidence of feedback being taken on board.²⁶ For example, a message from senior managers to staff in February 2014 acknowledged and took into consideration their concerns about the achievability of proposed productivity targets and the risk posed to the quality of decisions as a result. For this reason, senior managers decided not to introduce a target going beyond five events a week without making changes to business processes first. Local managers were also updating staff on the change programme through a weekly newsletter and were open to their ideas for improvement.
- 5.8 When we conducted our inspection in February 2014, the Business Assurance Team was engaging with staff in Cardiff and elsewhere on a productivity study. We saw this as evidence that UKVI was taking action to engage staff and harness their expertise with a view to improving casework processes.
- 5.9 We have commented in previous reports²⁷ on the Home Office's poor management of business change. While we are pleased that communication between senior managers and staff has improved since the original ACD change programme was suspended last September, the Home Office must still learn lessons from that programme for the future. In particular, the planning for the earlier change failed to anticipate the speed with which HEOs would leave asylum casework, the delay that would take place in recruiting new staff and the impact this would have on ACD's ability to prevent the emergence of a backlog of cases awaiting decision. In the light of that, we make the following recommendation:

UKVI was taking action to engage staff and harness their expertise with a view to improving casework processes

We recommend that the Home Office:

Evaluates its previous asylum casework change programmes in order to improve its management of future change.

Communication between asylum casework, appeals and enforcement

- 5.10 We were pleased to find good communication links between the Asylum, Appeals and Enforcement Teams in Cardiff. Staff in the Cardiff Asylum Team informed us that they were able to discuss any cases with presenting officers in the same building and there was the opportunity to receive direct feedback following an appeal.
- 5.11 Staff told us that that they had maintained relationships with appeals and enforcement staff in Cardiff as a result of previously working together in regional teams. It also helped that different parts of the business were co-located within the same building in Cardiff. We recognise the need for close working with enforcement in particular, as they manage asylum removals. Following the on-site phase of the inspection, we were informed that a specialist function had been established within ACD to assist with removals casework and to ensure a close working relationship with enforcement was maintained.

²⁵ <http://icinspector.independent.gov.uk/wp-content/uploads/2013/10/An-Inspection-into-the-Handling-of-Asylum-Applications-Made-by-Unaccompanied-Children-FINAL.pdf>

²⁶ Email from the Director of Asylum to asylum staff in UK Visas and Immigration, 26 February 2014.

²⁷ <http://icinspector.independent.gov.uk/wp-content/uploads/2012/11/UK-Border-Agencys-handling-of-legacy-asylum-and-migration-cases-22.11.2012.pdf>

Risks to operational delivery should be identified, monitored and mitigated

ACD objectives 2014/15

- 5.12 One of the main short-term aims of senior managers was to stabilise ACD by April 2014. To do this, they aimed to put in place:
- settled management structures;
 - an agreed business plan;
 - new customer service standards;
 - management information that enabled them to understand and manage the performance of the business; and
 - a full complement of trained staff allocated into supportive team structures.
- 5.13 This was with a view to moving to a consistent, competent, high-performing and customer-focused directorate, by eliminating the backlogs of cases awaiting decisions. ACD aimed to ensure that by April 2015 all outstanding decisions were younger than six months, with no more than 8,000 asylum cases nationally pending decision. ACD also aimed to achieve Customer Service Excellence by March 2015. According to senior managers, achieving the April 2015 target would mean that decisions would need to be made in around 32,000 cases, compared with an average of around 20,000 in recent years (when HEOs were seen as the main decision-making grade).
- 5.14 ACD considered that the key tools in achieving this would be:
- maintaining staffing levels;
 - moving to annualised working targets;
 - the successful rollout of productivity improvement tools, including more intelligent routing of cases and use of the structured decision- making tool;²⁸ and
 - streamlined grant and refusal letters.

At the time of inspection many of these tools were still being piloted.

- 5.15 There was a generally held view by staff in Cardiff that the focus was on quantity rather than quality. To this end, one senior manager told us that ‘if you get control over the quantity of your caseload, the quality will follow’. We were also told that the key aim was to ‘strip away the gold plating of decisions’.
- 5.16 Notwithstanding plans, as of the time of inspection, to take on and train 220 new staff at the decision-maker (EO) and administrative support (AO) levels by the end of April 2014, the targets for April 2015 appeared challenging. We noted that, in respect of future risks that both the ACD and Cardiff, risk registers were broadly aligned on key risks to performance, namely:
- increase in intake of new asylum applications;
 - insufficient resourcing, e.g. staff;²⁹
 - adverse impacts of changes in working practices and restructuring; and
 - failure to identify vulnerable individuals.

²⁸ This is a tool which aims to process case information against legislation and business criteria to help caseworkers make case decisions as well as help generate the decision letters themselves and other associated paperwork.

²⁹ A decision was made in February 2014 to recruit additional EO decision makers off the reserve list to try and mitigate the risk of staff ‘churn’ e.g. staff potentially leaving these roles.

5.17 Senior managers had clearly thought through the steps that they needed to take to eliminate the backlog of older cases and to bring the asylum system back into balance by April 2015. However, making 32,000 decisions in 2014-15 would constitute a 60% increase in productivity compared with recent years, and with a less experienced workforce. In addition, senior managers were placing a lot of faith in the streamlining of the decision-making process in an area of casework which is, by its nature, more complex than most. We intend to return to these issues when we conduct a comprehensive inspection of asylum casework in early 2015.

Making 32,000 decisions in 2014-15 would constitute a 60% increase in productivity compared with recent years, and with a less experienced workforce

Appendix 1 – Role and 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 department UK Visas and Immigrations (UKVI) was introduced under the direction of a Director General.

Appendix 2: Inspection Criteria

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

Inspection criteria used for this inspection

Operational Delivery

4. Decisions on the entry, stay and removal of individuals should be in accordance with the law and the principles of good administration.
5. Resources should be allocated to support operational delivery and achieve value for money.

Safeguarding Individuals

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

Continuous Improvement

7. The implementation of policies and processes should support the efficient and effective delivery of border and immigration functions.
8. Risks to operational delivery should be identified, monitored and mitigated.

Appendix 3: Glossary

Term	Description
A	
Administrative Officer (AO)	UKVI staff responsible for administrative tasks and basic decision-making.
Applicant(s)	Can refer to an individual (or family) applying for asylum or asylum support.
Assistant Director	Senior Manager within UKVI equivalent to civil service Grade 7 position.
Asylum	Protection given by a country, pursuant to the Refugee Convention of 1951, to someone with a well-founded fear of persecution in their own country.
Asylum Casework Directorate (ACD)	A UKVI Directorate which has responsibility for all asylum case work.
Asylum Screening Unit (ASU)	Home Office unit in Croydon which is the lead location for asylum applications and conducts screening.
C	
Case Information Database (CID)	An administrative tool, used by the Home Office to perform caseworking tasks and to record decisions.
Case-owner	Former UK Border Agency term for an official responsible for processing applications for leave to remain.
Caseworking Hub	UKVI's asylum support function is administered by seven caseworking hubs, which each have responsibility for a geographic area of the UK.
Customer Service Excellence	The government's customer service standard, replaced the Charter Mark initiative.
D	
Director	Senior UK Visas and Immigration Manager, typically responsible for a directorate, region or operational business area.
E	
Executive Officer (EO)	UKVI staffing grade senior to AO.
F	
Further Submissions	The term given to asylum or human rights grounds submitted to the Home Office by those who have already made an unsuccessful asylum or human rights claim, and who ask for their claim to be re-considered.

H	
Higher Executive Officer (HEO)	UKVI staffing grade senior to EO.
Home Office	The Home Office is the lead government department for immigration and passports, drugs policy, crime, counter-terrorism and police.
Human Rights Act 1998	An act that incorporates the European Convention on Human Rights (ECHR) into UK law.
I	
Immigration Enforcement and Engagement (ICE) Team	A Home Office enforcement team whose role is to detect and arrest individuals who do not have permission to be in the UK.
Immigration Rules	The Rules laid before Parliament by the Home Secretary, outlining the practice to be followed in regulating the entry into and stay in the UK of people subject to immigration control
N	
New Asylum Model (NAM)	The previous end-to-end case management system for processing asylum applications made after 4 March 2007. Following restructuring of asylum case work, this model is no longer in use.
P	
Presenting Officer	The person representing the Home Office (the Respondent) at appeal.
Q	
Quality Audit Team (QAT)	The team that conducts the internal quality assurance programme operated by the Home Office.
R	
Removal	The process by which a person with no permission to remain physically leaves the UK, through assistance or through enforcement by the Home Office.
S	
Screening Interview	The process of establishing initial information from an asylum-seeker in support of his or her claim.
Senior Case Worker	The Home Office term for an official, usually at Senior Executive Officer Level, responsible for a team of Caseworkers.
Senior Executive Officer (SEO)	A management grade senior to HEO.
Substantive interview	Applicants are asked a number of questions on all aspects of their claim and are invited to provide further evidence. Often lengthy in duration, the interview is designed to give an asylum-seeker the opportunity to support their claim and the Case Owner evidence to form the basis for a reasoned decision to grant or refuse.

U

UK Border Agency (UKBA)	The United Kingdom Border Agency. 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 under the control of the Home Office to form two new Directorates (UKVI and Immigration Enforcement).
UK Visas & Immigration (UKVI)	United Kingdom Visas and Immigration. One of 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: **Dr Rod McLean**

Lead Inspector: **James Clarke**

Inspector: **Dr Anna Marslen-Wilson**

Inspection Officers: **Remmy Ahebwa**
Louise Richards

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