



Home Office

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

Inspection of the Handling of Complaints and MPs' Correspondence

July – September 2015

The Home Office thanks the Independent Chief Inspector (ICI) for the recommendations in his report on 7 January 2016. Our responses are below.

We were pleased that the ICI found considerable positives in the way that UK Visas and Immigration, Border Force and Detention Services were handling MPs' Correspondence and Complaints. This reflects our ongoing commitment to implement improvements to the way we handle correspondence.

Our improvements are reflected in our published performance statistics. For example MPs' correspondence timeliness has been consistently at or above service standard since October 2014 (quarter 4 2014); and Service Complaints performance has shown an improvement during 2015, from 86% quarter 1, 88% for quarters 2 and 3, to 91% in quarter 4. In addition, 91% of MPs or their offices who responded to our Satisfaction Survey strongly agreed, or tended to agree that they were satisfied with the service.

On MPs' Correspondence handling the report makes no recommendations and highlights the "proactive and personalised service to MPs", with significant improvements on quality and timeliness for MPs' responses since the 2010 ICI report, supported by "evidence of innovation, with managers focused on smarter ways of working and on providing a more efficient service within the resources available".

On Complaints Handling the report also notes a number of positives, which include:

- "Clear and simple" procedures for making complaints accessible online and through leaflets and posters;
- Over 80% of cases sampled written in plain English and with an appropriate tone, with most Detention Services Complaints being well structured and addressing all the issues raised;
- 100% of cases sampled alerted the complainant to the option of raising the matter with the Parliamentary and Health Service Ombudsman (PHSO) if not satisfied, and appropriate signposting for those cases eligible to contact the Prison and Probation Ombudsman for independent review;
- The effective provisions for non-English speaking detainees in immigration removal centres to make complaints; and,
- Acknowledgment of an existing programme of work in UKVI underway at the time of the inspection to address some of the problems subsequently highlighted in the report.

We recognise the ongoing need to improve and welcome the challenge and recommendations in this report. We have already made progress in implementing some of the ICI's recommendations, several of which are being taken forward as part of the pre-existing Correspondence Improvement Programme.

Of the eight recommendations, the Home Office fully accepts six and partially accepts two for the reasons given below.

The Home Office should:

1. Recommendation 1:

Conduct a fundamental review of current guidance in relation to complaints handling and ensure that it is concise, unambiguous and practical, covering as a minimum:

- **For customer facing staff, the recording and reporting requirements for locally resolved complaints, unresolved complaints and for complaints about other business areas;**
- **For staff responding to written complaints about minor misconduct and service, the details to be included in the response regarding whether or not the complaint is upheld, what further steps (if any) will be taken, and the option of requesting a review if not satisfied;**
- **For staff responsible for maintaining the record of complaints, what needs to be recorded regarding whether or not the complaint is upheld, and the actions that have or will be taken and by whom.**

1.1 Accepted; implementation underway.

1.2 A review of guidance is underway and will be completed by May 2016. It will cover all the areas listed in the report recommendation.

2. Recommendation 2:

Put in place sufficient management and/or quality assurance checks to ensure that guidance is being applied as intended, that the investigation of complaints is thorough and impartial, that responses deal with the substance of the complaint, and that remedies are appropriate.

2.1 Accepted; implementation underway.

2.2 We will put in place measures to routinely sample cases to ensure full compliance with the revised guidance.

3. Recommendation 3:

Ensure that, where requested, the response to a request for a review of the handling of a complaint notifies the complainant of their options should they remain dissatisfied.

3.1 Accepted; implemented.

3.2 We have amended our standard text so that all customers are notified of their options, including escalating to a Stage 2 Complaint, or escalating to the PHSO via their MP.

4. Recommendation 4:

Review the stated aim to respond to all complaints within 20 working days and either take steps to ensure it is achieved in 95% of cases, in line with the published service standard, or revise it to provide complainants with a realistic timescale for a response.

4.1 Accepted.

4.2 We will review our service standard for Service and Minor Misconduct by July 2016 when the first two quarters of published performance data are available. The timing of the review will take account of the performance uplift that we expect to be an outcome from our Correspondence Improvement Programme. Any change to service standards would need to be agreed in consultation with Cabinet Office.

5. Recommendation 5:

Ensure that complaints are acknowledged in line with guidance, and where it is likely that the 20 working day target for a substantive response will not be met that complainants are notified and provided with regular updates until they are provided with a substantive response.

5.1 Accepted; implementation underway.

5.2 Future guidance will confirm that all email complaints will receive an automatic acknowledgement setting out our service standards. For any case that is likely to be resolved out of our service standards, we will contact the customer in advance and keep them updated until the complaint is concluded.

6. Recommendation 6:

Ensure that the Complaints Management System (CMS) is used to track the full history of a complaint from receipt to resolution, keeping the CMS record open until a substantive response has been provided to the complainant, recording accurately the details of any investigation and its findings, and retaining a copy of the original complaint and the response on the system.

6.1 Partially Accepted.

6.2 All cases will remain open on the CMS until a substantive response has been provided to the customer. We will amend our guidance to ensure relevant complaint details are recorded on CMS. In exceptional circumstances we may record some information relating to the investigation on alternative systems which have more limited access. This would be, for example, where there is sensitive information that requires more restricted access. Such information would still be fully accessible for audit and assurance purposes. Third party suppliers manage their own case records in line with contractual requirements.

7. Recommendation 7:

Ensure that a thorough and fair investigation is conducted of all minor misconduct complaints, taking all reasonable steps, including checks against Home Office systems and records, to identify the subject of the complaint where this is in doubt.

7.1 Accepted; implementation underway.

7.2 We will ensure all reasonable steps are taken to identify the subject of a complaint. In Border Force (which is the area in which the report raises this issue) new processes will be put in place to support this. Our commitment to thorough and fair investigation will be implemented through the review of guidance and the proposed changes to audit/assurance checks.

8. Recommendation 8:

In order to ensure compliance with guidance, greater consistency, and better quality assurance, retain ownership of complaints and responsibility for providing a substantive response within an appropriately resourced, dedicated correspondence team, which is empowered to require contributions from the relevant business area where necessary.

8.1 Partially Accepted.

8.2 Border Force complaints have been handled differently to UKVI and IE. We will ensure that all complaints are handled within a centrally assured framework of quality and timeliness. For cases that are not currently drafted by responding officers in our central correspondence teams, we will either transfer these cases into the central correspondence teams, or strengthen our audit and assurance to ensure the responses are of an equivalent standard. We will also review the structures of the two central complaints correspondence teams by the end of March 2016 to ensure we have the most effective model. This will include an end to end process review of complaint handling in Border Force to inform a decision by Border Force Senior Management.