



# Independent Chief Inspector of Borders and Immigration Spot Check Visits

Spring 2014

**John Vine CBE QPM**

Independent Chief Inspector of  
Borders and Immigration



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by John Vine CBE QPM

Independent Chief Inspector of Borders and Immigration

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

Email: [chiefinspector@icinspector.gsi.gov.uk](mailto: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



For my second spot-check report, I looked at the Home Office's handling of complaints and MP correspondence and its entry clearance operations in Abu Dhabi and Islamabad.

Both business areas had made significant progress against previous recommendations, and were well supported by professional and dedicated staff.

*Both business areas had made significant progress against previous recommendations, and were well supported by professional and dedicated staff*

I found that the staff in the Customer Service Improvement (CSI) team – who are responsible for dealing with complaints and MP correspondence – were genuinely committed to, and serious about, good customer service. They are now supported by organisational structures and resources which allow them to do their jobs more effectively.

I was also impressed by the determination that the CSI Director has shown in improving complaints handling. Not only had my recommendations been acted upon, but it was apparent that considerable thought had gone into how to continue to improve the process beyond the findings of my report.

*Considerable thought had gone into how to continue to improve the process beyond the findings of my report*

At both Abu Dhabi and Islamabad, I saw considerable evidence that process management in both posts had developed, staff engagement and management techniques had improved and management oversight was better.

I was pleased to note that the customer-service focus being promoted by the current head of UK Visas and Immigration has been adopted enthusiastically by staff at these two posts. The recent award of Customer Service Excellence to Abu Dhabi is indicative of this new focus.

It was reassuring to see in these spot-check visits how much progress had been made since my inspections.

*John Vine .*

**John Vine CBE QPM**  
**Independent Chief Inspector**



# 1. Background to Spot Check Visits

## **August 2013.**

- 1.1 The Home Office is ultimately responsible for implementing my recommendations, and is accountable to the Home Secretary, Ministers, Parliament and the public for improvements to service delivery. This being so, I do not routinely undertake full re-inspections of areas of business that I have previously scrutinised.
- 1.2 However, this year (2013) I have initiated a series of follow-up spot-check visits to assess how certain areas have changed, developed or improved since we last inspected them.
- 1.3 These spot checks are arranged in advance with the relevant business area, and usually last no longer than one day.
- 1.4 Following each spot-check visit, I produced a brief summary assessment of progress, which was sent to the relevant Director General at the Home Office and copied to the Home Secretary.

## 2. HANDLING OF COMPLAINTS AND MP CORRESPONDENCE

### Background

- 2.1 An effective and efficient complaints procedure is essential if people are to have confidence that an organisation listens to concerns and takes appropriate action. Such a procedure ensures that the organisation understands the impact on individuals of its behaviour and decisions; and, crucially, it provides a strong driver for improvement.
- 2.2 In 1994 the Complaints Audit Committee was established to improve public confidence in the handling of complaints by the then Immigration and Nationality Directorate (later the Border and Immigration Agency, then the UK Border Agency). The Committee conducted quarterly audits of complaints and made a series of recommendations to improve the way in which complaints were handled.
- 2.3 In its final annual report, the Committee acknowledged that the Agency had accepted the overwhelming majority of its recommendations and that revised structures for handling complaints were being introduced. The Committee noted that some recommendations had been implemented more speedily than others and that some weaknesses remained, particularly in the quality assurance of management information.
- 2.4 On 1 July 2008, the remit of the Committee passed to me as the Independent Chief Inspector of Borders and Immigration and in October 2009 I initiated a comprehensive thematic inspection into the UK Border Agency's handling of complaints and MPs' correspondence. My report was published in July 2010.
- 2.5 My spot-check follow-up visit took place on 10 September 2013.

### July 2010 Inspection findings

- 2.6 My inspection in 2009-10 found that the UK Border Agency had developed a clear approach to the handling of complaints and correspondence and had set out a clear strategic direction through its Customer Strategy. However, it had yet to demonstrate that it was learning lessons consistently or was addressing the root causes of complaints.
- 2.7 At the time of the inspection, management information was not being used consistently to identify trends or to improve service delivery. Information on the volume of complaints received and the outcome of complaints was not published.
- 2.8 There had been a significant improvement in the handling of serious misconduct<sup>1</sup> complaints, following the creation of a fully trained Professional Standards Unit. Investigations were carried out thoroughly and performance was consistently in line with the UK Border Agency's targets.

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<sup>1</sup> Serious misconduct is any action or behaviour of a UK Border Agency or Border Force staff member or contractor which, if substantiated, could require formal management action such as written warnings, dismissal or other penalty.

- 2.9 I found that the creation of Customer Service Units provided the potential for more consistent recording and tracking of service<sup>2</sup> and minor misconduct<sup>3</sup> complaints. However, the new electronic Complaints Management System had not yet been rolled out across the whole of the UK Border Agency, and it was unclear at the time of my inspection when it was going to be compatible with other information technology systems.
- 2.10 Performance for both service and minor misconduct complaints was well below UK Border Agency targets. For example, audit trails showing the handling of complaints were inconsistent; it was unclear whether complaints were substantiated; and there was limited evidence that lessons were being learned as part of the complaints process. Furthermore, there was inconsistency in the understanding of what constituted a complaint.
- 2.11 In addition, there was no active management of complaints that missed UK Border Agency performance targets. Local resolution procedures were not fully understood by staff and there was only limited evidence that customers had been engaged in the process.
- 2.12 I made 15 recommendations for improvement, of which 9 were fully accepted, 5 accepted in principle, and one accepted in part by the then UK Border Agency.
- 2.13 The issue of complaints handling often features in my inspections and so I was interested to return to this subject on a spot-check visit to see how things had developed. It is a subject I consider in all of my inspections as a 'golden thread', and is one of my ten standard inspection criteria.

### Progress against 2010 recommendations

**Recommendation 1: The UK Border Agency should systematically analyse complaints and MPs' correspondence to identify potential improvements in service.**

- 2.14 This recommendation was accepted by the UK Border Agency and is still considered 'open' by the Home Office.
- 2.15 A process was already in place at the time of inspection for the analysis of serious misconduct complaints and appears to operate well.
- 2.16 For service and minor misconduct complaints, the process was weaker. However I was pleased to learn on my visit of new monthly Performance Analysis Meetings (PAM), which would help to identify and develop a process for better dissemination of actions across business areas in response to complaints.
- 2.17 I was made aware of a new process for the handling of ministerial complaints, and I spoke to some MP Account managers. I was impressed by the dedication of this team.

<sup>2</sup> Service complaints are related to the way that the UK Border Agency or Border Force work, e.g. delays, administrative errors etc.

<sup>3</sup> Minor misconduct matters are those that, if substantiated, would not normally lead to criminal or misconduct proceedings against the person whose behaviour was complained of.

- 2.18 With Customer Service Improvement (CSI) now being responsible for the handling of all<sup>4</sup> official correspondence including complaints, there is a great opportunity for this sort of learning and improvement to be driven forward centrally.

**Recommendation 2: The UK Border Agency should set clear service standards for each customer service unit.**

- 2.19 This recommendation was accepted in principle by the UK Border Agency and has now been closed by the Home Office.
- 2.20 Clear service standards for responding to complaints have been set up. CSI have made complaints management guidance available to all staff via the Home Office intranet and this guidance includes the definition of a complaint, timescales for handling complaints, and details of the external bodies that customers can contact if they are not satisfied with how their complaint has been dealt with by the Home Office.
- 2.21 With all staff who are responsible for responding to complaints being housed in the same business area, managers are able to exert a greater control of standards than was previously possible.

**Recommendation 3: The UK Border Agency should ensure that any cases that are not resolved within the target period are actively managed and resolved promptly.**

- 2.22 This recommendation was accepted in principle by the UK Border Agency and has now been closed by the Home Office. We were told that monthly performance reports have been sent to each Director to allow them to track and monitor caseloads. This has enabled them to identify when cases were out of service standard.
- 2.23 Under the new regime, CSI's senior management team continually monitors cases falling outside service standards. Weekly and monthly performance management meetings allow them to identify where cases are falling out of target and to take action with case managers.
- 2.24 In addition, a single point of receipt for all complaints, introduced in 2011, helped to simplify allocation times, giving respondents longer to produce their replies and thus ensuring that more complaints were responded to within the agreed service standard.

**Recommendation 4: The UK Border Agency should publish information on the number of complaints received, the time taken to resolve them and whether the complaints have been upheld.**

- 2.25 This recommendation was accepted in principle by the UK Border Agency and has now been closed by the Home Office.
- 2.26 Quarterly information about complaints is now published online, including performance against targets for complaints and MP letters. The UK Border Agency responded swiftly to this recommendation and information has been made public since August 2011.

<sup>4</sup> I note that Border Force retains its own process for responding to complaints. Although all complaints are processed through the CSI Complaints Hub, those relating to Border Force are dealt with by Border Force officials and following a different process to the rest of the Department.

2.27 I believe this is a huge step forward and that this sort of transparency in a complaints system is essential for an organisation to improve and develop.

**Recommendation 5: The UK Border Agency should ensure that there is clear accountability for meeting performance targets.**

2.28 This recommendation was accepted by the UK Border Agency and has been closed by the Home Office.

2.29 The recent move of CSI into the new UK Visas and Immigration, headed by Director General Sarah Rapson, is a clear sign of the determination of the Department to drive improvement in this area. Sarah Rapson has very publicly stated that she is determined to improve customer service in her area and has implemented a number of processes to ensure accountability in the field. I welcome this emphasis on customer service and the recognition of the value of complaints information in driving improvement.

**Recommendation 6: The UK Border Agency should ensure that the definition of a complaint is understood and applied consistently across the organisation.**

2.30 This recommendation was accepted by the UK Border Agency and has now been closed by the Home Office.

2.31 The UK Border Agency set out a clear definition for what it considered to be a complaint. This definition, which I consider acceptable, is clearly set out in the guidance on complaints handling which is available to all staff. On my spot-check visit, staff I spoke to were familiar with the definition and were well-trained to identify a complaint.

2.32 I was pleased to see that the CSI were aware of the need to ensure that new staff were well-trained in this area, and of the need to continually refresh the memory of staff with regard to this. We were informed that initiatives were underway to develop understanding amongst staff outside CSI in order to ensure an organisation-wide understanding of this definition. I hope that the closure of the recommendation will not result in the importance of this task being lost.

**Recommendation 7: The UK Border Agency should ensure that its Complaints Management System is delivered to all areas of the UK Border Agency, in order to ensure consistent recording of data.**

2.33 This recommendation was accepted in principle by the UK Border Agency and is still considered 'open' by the Home Office. Whilst the majority of units are now using the Complaints Management System, work is still underway to extend the system to Detention Services. This has required modifications to be made to parts of the system in order to reflect the business of Detention Services.

2.34 An understandable decision has also been taken not to extend CMS to UKVI posts around the world, due to the prohibitive costs associated.

2.35 I was surprised to learn that Border Force does not follow the same process as the rest of the Department for complaints handling. Whilst they do use the complaints portal operated by CSI, they then follow their own process for responding to complaints.

2.36 No clear rationale for this was forthcoming during my visit and I believe this will hamper CSI in delivering consistency in response to complaints handling across the Home Office immigration function.

**Recommendation 8: The UK Border Agency should, in each of its responses to a complaint, provide full and accurate information on how individuals can contact the Parliamentary and Health Service Ombudsman or the Prisons and Probation Ombudsman (as appropriate).**

2.37 This recommendation was accepted by the UK Border Agency and has been closed by the Home Office. A standard line, directing complainants to the relevant referral body, has now been incorporated into response templates and is used in every appropriate case.

**Recommendation 9: The UK Border Agency should introduce efficient and consistent processes for the quality assurance of MPs' correspondence and complaints.**

2.38 This recommendation was accepted by the UK Border Agency and has subsequently been closed by the Home Office.

2.39 I was pleased to learn that a team, set up in 2009, had taken responsibility for ensuring the consistency and quality of responses to MP correspondence. This team had undertaken a number of actions to drive improvement in the quality of responses.

2.40 CSI's new operating process sees responder hubs, based in the regions, become responsible for drafting and quality assuring replies to MPs' correspondence and complaints. Despite these hubs being geographically distinct from one another, there is now a solid line of command to the CSI, which will ensure consistency and provide the Department with the opportunity to better quality-assure the responses produced.

**Recommendation 10: The UK Border Agency should ensure that all complaint files have a clear audit trail, recording the outcome and level of authorisation.**

2.41 This recommendation was accepted by the UK Border Agency and has now been closed. The Complaints Management System operated by the Complaints Hub creates a clear audit trail, recording to whom the complaint has been allocated, the actions and the outcomes of each case. The implementation of this system appears to have proven extremely effective.

**Recommendation 11: The UK Border Agency should ensure that all staff have a clear understanding of their responsibilities with regard to the referral of complaints wherever racism or discrimination is alleged.**

2.42 This recommendation was accepted by the UK Border Agency and is now closed. Complaints guidance makes clear to staff their responsibilities in this area and in addition there is an e-learning package available to staff on this issue.

**Recommendation 12: The UK Border Agency should, as soon as possible, conclude arrangements for the referral to the police of complaints that include criminal allegations (by the end of 2010 at the very latest).**

- 2.43 This recommendation was accepted by the UK Border Agency and has now been closed by the Home Office.
- 2.44 A new referral process was implemented from April 2010 after a successful pilot involving the Metropolitan Police Service (MPS). Any criminal allegations received as serious misconduct complaints are reported by the Professional Standards Unit to the relevant police force.
- 2.45 A review of the crime reporting arrangements was undertaken in July 2011 and confirmed that they were working successfully, i.e. they had resulted in 100% of criminal allegations referred by UKBA's Professional Standards Unit being accepted by the Metropolitan Police Service in 2011.
- 2.46 In addition to the work carried out to address this specific recommendation, the Home Office advises that it has developed its working relationship with the police in respect of operations involving both police and immigration officials, for example on enforcement visits.
- 2.47 This included the implementation of a protocol with the MPS, providing a framework for co-operation and information-sharing during the investigation of serious misconduct complaints (including those containing criminal allegations) arising from Home Office staff operating within the Metropolitan Police District, including when operating jointly with MPS officers.
- 2.48 It was recommended to the Association of Chief Police Officers (ACPO) that the arrangements should be rolled out nationally. ACPO agreed in principle and began consulting with all Forces' Professional Standards Departments. On 20 October 2011, ACPO confirmed agreement to roll out the arrangements nationally.

**Recommendation 13: The UK Border Agency should ensure that the process of local resolution is used, that it involves the customer directly in the process, and that the guidance is applied consistently throughout the UK Border Agency.**

- 2.49 This recommendation was accepted in principle by the UK Border Agency and remains open. CSI had undertaken workshops with staff to identify the need for local resolution processes where it was identified that the process set out in guidance was either overly bureaucratic or ineffective in certain situations.
- 2.50 The workshops identified that different business areas across the Department needed different local resolution policies, targeted to the nature of the work being done and the level and extent of customer engagement.
- 2.51 Whilst I think that local resolution reduces the bureaucracy of complaints handling, it needs to fit with the culture of the organisation for it to work effectively. On the basis of this visit, I am reassured of the progress being made in this area with a view to implementation in the future.



**Recommendation 14: The UK Border Agency should set out clearly to MPs how they can receive information from the UK Border Agency, as well as the standard of service they can expect to receive.**

- 2.52 This recommendation was accepted by the UK Border Agency and has been closed.
- 2.53 On this visit, I was introduced to one of the teams of MP Account Managers and their support staff. This new role, introduced and expanded since my original inspection, appears to have dramatically improved the Home Office's engagement with MPs, including dedicated helplines, face-to-face and email interaction with a named individual, and the opportunity for MPs to feed directly into the services they can use.
- 2.54 I was impressed with the professionalism on display and the apparent determination to ensure that MPs getting in touch with the Department can quickly and accurately find the information they require on behalf of their constituents.

**Recommendation 15: The UK Border Agency should ensure that customers have a single point of entry to the complaints procedure. It should seek regular feedback from its customers in order to assess their satisfaction with the complaints procedure, and should develop clear measures to drive improvement year on year.**

- 2.55 This recommendation was accepted in part by the UK Border Agency. The complaints allocation hub, set up in 2011, provides this single point of entry to the complaints procedure. I met the team who operated the hub, who had a good grasp of the importance of their role and were clearly providing a key service. This is a vast improvement on the previous situation, where customers had to decide which of 11 customer service units to contact.

### **Additional developments**

- 2.56 The Professional Standards Unit, which deals with serious misconduct complaints, has moved from CSI to the Departmental Security Unit. For this reason, my follow-up visit did not include any consideration of their work. However, at the time of my 2010 inspection, I was satisfied that the system for serious misconduct complaints was appropriate and subject to some oversight by the Independent Police Complaints Commission in the most serious complaints. I made no recommendations about this issue in my previous report.

### **Areas of concern**

- 2.57 Although I was greatly assured by this visit and by the very real, tangible improvements that have, and continue to be made, I am concerned at the difference in process being operated by Border Force in comparison to the other immigration directorates of the Home Office.
- 2.58 I believe it would be sensible for the Home Office to consider why Border Force is operating under its own system, and to consider whether it ought to be brought into line with the rest of the Department.



## Conclusion

- 2.59 Overall, this spot-check visit was extremely positive and I was pleased with the progress made in the period since my inspection. Not only had the majority of my recommendations been acted upon in full, but it was apparent that considerable thought had gone into how to continue to improve the process beyond the findings of my report.
- 2.60 The staff working in this area seem genuinely committed to, and serious about, good customer service and providing a sound and consistent process for dealing with complaints and handling MPs' correspondence. These dedicated staff now also appear to be supported by organisational structures and resources which allow them to do their jobs more effectively.
- 2.61 There is now little excuse for complaint handling not to be done well across the Home Office immigration function generally and I shall be looking for evidence that this is the case on the ground.
- 2.62 I was very grateful for the obvious effort put in by the team in preparing for my visit, and in particular the determination that the CSI Director has shown in improving complaints handling. It is perhaps significant that she has remained in post since my 2009 report and has considerable corporate memory and expertise in this area.

## 3. ENTRY CLEARANCE IN ABU DHABI AND ISLAMABAD

### Background

- 3.1 Between January and May 2010 I undertook a full inspection of the then UK Border Agency visa issuing posts in Abu Dhabi and Islamabad. At the time of my inspection, visa operations in the United Arab Emirates and Pakistan were part of the International Group's South Asia and Gulf region. Abu Dhabi had been operating as a regional hub since 2008, receiving applications from commercially run UK visa application centres in Abu Dhabi, Bahrain, Dubai and Pakistan. It also received applications made at the British Embassy in Iran.
- 3.2 The deteriorating security situation in Pakistan in 2008 required the Agency to make fundamental changes to its visa operation there, with virtually all decision-making being transferred either to Croydon or to Abu Dhabi.
- 3.3 Pakistan is the fourth largest source of applications to enter the UK, so the quality and consistency of decision-making is of great importance. Getting these decisions right was crucial if the Agency was to meet its objective of maintaining the integrity of the border.
- 3.4 In light of the seriousness of my findings, I decided in my 2011-12 inspection plan to include a full re-inspection of these posts to assess progress made against my recommendations. This was an unusual and unprecedented step for the Inspectorate, but I believed it to be merited.
- 3.5 Following the publication of my 2010 inspection, the Agency implemented changes to its process which meant that, by the time of my re-inspection at the end of 2011, Islamabad was responsible for processing all settlement, EEA family permit, business visit and long-term visit visa applications made in any of the four visa application centres in Pakistan. Abu Dhabi retained responsibility for processing all remaining categories of applications from Pakistan, Bahrain, UAE and Tehran.
- 3.6 My spot-check follow-up visit, examining progress on the recommendations from both reports, took place between 26-28 November 2013.

### 2010 Inspection Findings

- 3.7 My inspection in 2010 found that the initial planning for the transition of work from Islamabad to Abu Dhabi appeared robust and included a number of planning assumptions around the transfer of work. However, I found significant weaknesses in the way this high-level plan was translated into an effective operational plan covering both visa sections. This meant that work was not joined-up – particularly important when different parts of the visa application process were completed across both visa sections.

- 3.8 I found poor process management and ineffective communication across both locations. Stakeholders expressed strong concerns about the level of service provided since the transfer of work had taken place and I identified serious issues with the way in which the Agency handled and managed correspondence and complaints.
- 3.9 I found that entry clearance work was not effectively supported by risk profiles, although the presence of Risk and Liaison Overseas Network staff in both locations helped to lessen the impact of this issue.
- 3.10 My file sampling identified inconsistent decision-making by entry clearance staff, who frequently referred to the intense focus on the achievement of numerical targets, which they believed affected their ability to make correct decisions. My file sampling results supported this and strongly suggested there was a correlation between a focus on numerical benchmark targets and inconsistent and poor decision quality.
- 3.11 The administrative review process was working well in Abu Dhabi, with refusal decisions being overturned following reviews by Entry Clearance Managers. It was therefore disappointing that I identified significant delays in these reviews being carried out. Allowed appeals were also not being routinely examined to determine why refusal decisions were being overturned.
- 3.12 Worryingly, I found that an inconsistent approach was adopted by entry clearance staff over the weight that was attached to evidence, depending on the nationality of the applicant. This effectively meant that applicants from the Gulf Co-operation Council countries (Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the UAE) appeared to be treated more favourably than applicants from Pakistan. I also found that applicants in Pakistan were subject to higher evidential requirements in support of their entry clearance applications, although this was not made clear to them at the time when they made their applications. I was therefore concerned that the UK Border Agency was discriminating unlawfully in favour of Gulf Co-operation Council applicants and against Pakistanis.

### **2011 Inspection Findings**

- 3.13 My re-inspection in 2011 followed a similar approach to my previous inspection of the Abu Dhabi and Islamabad Visa Sections, with a particular focus on whether or not performance had improved since my last inspection.
- 3.14 I was pleased to identify improved performance against customer service processing targets in other visitor and settlement cases. However, this was not the case in a number of Tier 4 (student) cases, which missed the target. I was, however, pleased to note an improved quality of decision-making in Tier 4 cases.
- 3.15 There was also an improvement in the quality of decision-making in other visitor and settlement cases, which was more consistent, fair and effective. There was also less of a focus on meeting numerical targets, and more focus on decision quality.
- 3.16 Despite identifying some improvement in the quality of decision-making, there was still room for improvement, and I noticed some instances of cases where additional information requirements had been made. This was not fair to applicants.
- 3.17 Although there remained some concerns with decision quality, I did not find that Pakistani nationals were being treated unfairly. I identified some differences in the level of checks carried out for different applications; however, I was satisfied that this

was based on an intelligence-led assessment of the level of risk posed to the UK. I found that the administrative review process was working well – an improvement on my previous inspection – however, there were significant delays in processing these reviews, an almost identical finding to the one that I had made during my previous inspection.

- 3.18 I identified a number of cases where staff failed to retain sufficient supporting documents on file, particularly in settlement cases where entry clearance had been granted. Despite guidance, in many cases, entry clearance staff were still not complying with the requirements and failed to retain sufficient documentation on file.
- 3.19 I was pleased to find that both Abu Dhabi and Islamabad had a clear complaints-handling process in place, which was set out in internal guidance, and in both posts staff had received training on complaints handling and complaints identification. However, in Abu Dhabi I found that there was limited senior management oversight of other correspondence. I also found that limited resource was allocated to complaints handling in Islamabad and as a result the visa section was routinely failing to meet the target to resolve 95% of service complaints within 20 working days.
- 3.20 In contrast to my previous inspection, I found that both visa sections had carried out work to examine the reasons why refusal decisions were overturned at appeal. Through this analysis, common themes had been identified and circulated to entry clearance staff, which had led to improvements in the quality of decision-making.

### **Progress against 2010 recommendations**

**Recommendation 1: The UK Border Agency should implement a clear operational strategy for the management of all three visa sections, so that an improved level of service is delivered to customers irrespective of where different parts of the application process are dealt with.**

- 3.21 This recommendation was accepted by the Agency and is now considered closed by the Home Office. Since 25 October 2010, the work streams from the Pakistan visa application network have been condensed into two visa processing centres:
- Islamabad – Processes all settlement, EEA Family Permit, Business Visit and long-term validity visit visas (2,5,10 year)
  - Abu Dhabi – All remaining categories from the four VACs in Pakistan. Abu Dhabi also processes the applications from the VACs in Bahrain and the UAE.
- 3.22 Governance for the work streams has now been divided. Working to the Regional Manager are an Operations Manager for the Abu Dhabi Hub, an Operations Manager for Islamabad and a Regional Operations Manager leading on the VFS relationship management and other Gulf Posts.
- 3.23 Since April 2010, Abu Dhabi and Islamabad have been managed within a new regional command under the leadership of a Regional Director based in Abu Dhabi. The Regional Director has formulated a clear strategy for delivering customer service improvements, including a clear business plan and a better management plan, both of which I was shown as part of this spot-check visit.
- 3.24 I was shown data which demonstrated that, in the majority of cases, Abu Dhabi are processing applications within customer service standards. Turnaround times in Abu

Dhabi average 6-10 days for Pakistan, 3-5 days for Bahrain and the UAE. Turnaround times in Islamabad average 3-6 days on Business Visit applications and 6 weeks on settlement.

- 3.25 I was also told that Abu Dhabi provided a relief stream to the UK Visa Section to assist in the clearance of settlement appeals. I was pleased to note this sensible allocation of resources.
- 3.26 In April 2012 Islamabad began processing all settlement, PBS, EEA Family Permit applications and a small number of direct visit and Exempt Official applications. The post also launched a Priority Visa Service in Pakistan (visits only). These priority applications were processed by Islamabad until end June 2013, when they were transferred to Abu Dhabi. I was able to visit the VAC while I was in Islamabad and was shown the priority lounge where applicants using the priority service can wait for their appointment. It was a well-managed and professional facility.
- 3.27 I was told of a period during August 2013, when there was a political and civil crisis in Egypt, which led to the Embassy and VACs in Egypt being temporarily closed. As a result, all visa processing work from Sudan (which was previously conducted in Cairo) and some processing work from the two VACs in Egypt was transferred to Abu Dhabi. This was impressive, as I am not confident that the management strategy for the post at the time of my 2010 inspection could have accommodated this additional pressure.

**Recommendation 2: The UK Border Agency should strategically assess whether the existing focus on the achievement of numerical targets is impacting negatively against decision-making quality.**

- 3.28 This recommendation was accepted by the Agency and is now considered closed by the Home Office. I was advised that the Agency had issued guidance to all posts on the setting of ECO productivity benchmarks in January 2011. All Operational Policy Instructions (OPIs) are signed off by the Visa Services Director-led Operations Board, which has regional and operational representatives. This includes a list of factors to be taken into account for those who set productivity targets.
- 3.29 I spoke to staff in both posts and was told that ECMs had discussed the guidance with all ECOs and that it was now implemented. Without exception, all the ECOs I spoke to said that their workload was manageable and they felt that their targets were achievable.
- 3.30 Management in the region have put considerable effort into improving decision quality. I was advised that regional workshops had been held for ECOs on decision quality and 'getting it right first time' and had been well received. Furthermore, in both Abu Dhabi and Islamabad I saw that all ECOs were rotated through the different work streams, included appeals reviews, to help better inform initial assessment. This is good practice. However, I was not able to validate the quality of decision-making, as I did not undertake an analysis of cases on this visit.
- 3.31 I was told of some work that Abu Dhabi had undertaken on productivity levels and that it was using this comparator with other regional posts to establish reasonable benchmarks for staff. When moving decision-making work to the Islamabad Visa Section (business, long-term and settlement applications), extensive benchmarking exercises were conducted and the results conveyed to ECOs.

3.32 I was told of regular reviews of benchmarking taking place across the region, with the most recent having been completed in March/ April 2013. Furthermore, I was interested to hear from the Regional Director about a time and motion study he had recently undertaken to help improve productivity metrics and feed into benchmarking.

**Recommendation 3: The UK Border Agency should take immediate action to ensure it is operating in accordance with its duty under the Race Relations Act 1976 as amended by the Race Relations (Amendment Act) 2000.**

3.33 This recommendation was noted by the Agency and has now been closed by the Home Office. It related to one of the biggest concerns that I encountered during my 2010 inspection – that the Agency was potentially unlawfully discriminating against Pakistani applicants in favour of those from the UAE.

3.34 I was pleased to note that the Agency had responded quickly to this recommendation and that any more rigorous scrutiny in entry clearance operations is lawful and based on an intelligence-led assessment.

**Recommendation 4: The UK Border Agency should ensure that guidance issued to customers sets out clearly the supporting documentation they need to provide in support of their application.**

3.35 This recommendation was accepted by the Agency and has now been closed by the Home Office. The focus of the recommendation was around occasions where applicants submitted their applications in line with published guidance but where ECOs required further information in order to make their decision. The applicants were not being given the opportunity to submit this information, their application was rejected and they were required to submit a new application, at a further cost.

3.36 This recommendation, accepted by the Home Office, is important as it demonstrates a fair and reasonable approach to consideration of applications by the Home Office. In response, I was pleased to learn that in Abu Dhabi all ECOs had been reminded that, when refusing cases in non-PBS categories, ECOs should make it clear that they have considered the application on the basis of the information provided, but that they are not satisfied, on the balance of probabilities, that the applicant has shown that s/he meets the requirements of the Immigration Rules. ECOs told me that they would, in relevant cases, then give the applicant the opportunity to provide the further information they required. The decision would be withheld until the further information was provided. This is good practice.

3.37 Posts were also advised by the Home Office to ensure that refusal letters do not state that applicants are being refused for failing to provide specific documents which they were not asked to supply or given the opportunity to provide.

3.38 This use of evidential flexibility in appropriate cases, as provided for in the Immigration Rules, was also apparent in Islamabad. For example, a recent legal challenge on the maintenance requirement has meant that a number of cases cannot be refused as they previously might have been. Applicants are being encouraged to provide additional documentation to evidence that the income threshold is met. Once this is submitted, the application is assessed again by an ECO. This enables some cases to be proceeded with, which would otherwise have stalled because of the pending legal decision.



**Recommendation 5: The UK Border Agency should take prompt action to improve its customer service in alignment with the commitment set out in its Customer Charter and Customer Strategy.**

- 3.39 This recommendation was accepted by the Agency and has now been closed by the Home Office.
- 3.40 Although the Customer Charter and Customer Strategy have been withdrawn, I detected a strong focus on the customer in both Abu Dhabi and Islamabad, and a drive within teams to provide the best possible service. This approach is commendable and reflects the strategic ambition of the Director General of UK Visas and Immigration.
- 3.41 I was pleased to hear of the recent Customer Service Excellence award to the Abu Dhabi Visa Section on 28th May 2013, which was unveiled by the Regional Director during a UKVI-wide Customer Service Week. I was also impressed to learn that Islamabad also aims to achieve Customer Service Excellence by the end of 2014. This is positive, and in spite of the former UKBA customer charter and customer strategy being withdrawn.
- 3.42 Management in both Abu Dhabi and Islamabad were fully behind customer service initiatives and in both locations I spent time with dedicated customer services teams who were clearly committed to, and fully understood the importance of, their roles.

**Recommendation 6: The UK Border Agency should set out clear roles and responsibilities for correspondence and complaints handling and communicate those to key stakeholders and customers; and**

- identify complaints correctly;
- train staff appropriately and provide clear guidance – with examples – on what constitutes an ‘expression of dissatisfaction’;
- respond to customers appropriately;
- carry out effective quality assurance processes to ensure complaints procedures are being complied with; and
- implement the service standards set out in its Customer Strategy.

- 3.43 This recommendation was accepted by the Agency and remains open. I was pleased to note in both locations that complaint handling was a priority. Managers saw the level of complaints as an indicator of their overall performance as a visa section, both in terms of delivery and customer service. Both Islamabad and Abu Dhabi analyse the complaints they receive in order to identify trends, which inform business changes aimed at improving customer service.
- 3.44 Complaints volumes at both posts have fallen. Staff told me of training they had received to improve their written skills in correspondence, including specific training for locally engaged staff in Islamabad.
- 3.45 Islamabad already has an established User Group that meets regularly to discuss operational issues and customer service. Abu Dhabi is currently setting up its own User Group aimed at gathering feedback on its performance, and customer service. Feedback from these groups is being used to improve service.

- 3.46 In a number of places in Abu Dhabi, including above many desks, the definition of a complaint was pinned to the wall to help remind and encourage staff to escalate anything which might be considered a complaint. Emphasis was also given in team meetings on complaint identification procedures and associated scenarios of what constitutes a complaint.

**Recommendation 7: The UK Border Agency should implement a formal review to determine the main reasons for allowed appeals and use this analysis to drive improvements in decision-making quality.**

- 3.47 This recommendation was accepted by the Agency and remains open. It was a significant concern to me during my inspection that this was not, apparently, being done. I was therefore pleased to see evidence that Abu Dhabi was now conducting a full analysis of its appeals data and had introduced a new Management Information (MI) spreadsheet on appeal outcomes. This spreadsheet was being used by ECMs to assist with the development and training of ECOs to improve performance.
- 3.48 The success rate at appeal is now being monitored regularly, with ECOs considering the determinations of allowed appeals. With the rotation of ECOs through various roles and responsibilities that I mentioned earlier, this ensures that the majority of ECOs are able to experience this side of the work.
- 3.49 Both posts are now undertaking formal structured appeals determination analysis and are using the information to develop best practice. Managers seem confident that this work is contributing to an improvement in decision-making; however, I was unable to verify this, as I did not examine decision-making quality on this visit.
- 3.50 I was also shown evidence that work with ECOs to improve the quality of refusal notices in both Abu Dhabi and Islamabad had taken place and had incorporated the results of appeals analysis.

### **Progress against 2011 recommendations**

**Recommendation 1: The UK Border Agency should ensure that decisions are subject to effective scrutiny, supported by the use of regular verification checks to confirm the veracity of supporting documentation, in order to strengthen the decision-making process and to ensure it is working to achieve the strategic objective to protect the border and national interests of the UK.**

- 3.51 This recommendation was accepted by the Agency and has been closed by the Home Office. I did not undertake a file sample on this visit and so cannot comment on any progress that either post may have made in decision quality. However, at both locations I was shown the quality assurance process which was used to monitor decisions being made by ECOs.
- 3.52 This process included regular and routine reviews of files; one-to-one discussions and feedback with ECOs; consideration of appeals determinations; and the embedding of ECMs to sit within ECO teams to provide instant advice and guidance on difficult cases.
- 3.53 Close engagement with Risk and Liaison Overseas Network (RALON) teams in both locations was evident. RALON teams were providing up-to-date risk profiles which were



clearly being used by ECOs to help inform decision-making. Although I did not make any recommendations relating to RALON in either of my inspections, I was impressed by the work RALON were doing in both Abu Dhabi and Islamabad to support the visa process.

- 3.54 I was advised that, between September 2012 and September 2013, 35% of Islamabad applications sent for verification contained at least one non-genuine document, which shows the benefits of using risk profiles.
- 3.55 In Islamabad I also observed the new interview process that has recently been adopted. These interviews (both on the telephone and face-to-face) provide another avenue by which ECOs can assess the authenticity of a visa application to help them make accurate decisions. I have not made any comment on the conduct of these interviews here, as they are to be the subject of a full inspection later in the year.
- 3.56 I was impressed by the 'Asad' database (Applicant and Sponsor Abuse Database) being used in Abu Dhabi and recently introduced in Islamabad. This was a locally developed initiative, designed by a member of the team in Abu Dhabi with some technical expertise, and helps to provide evidence to support intelligence packages produced by RALON. I was also pleased to note that the member of staff who designed the database had been recognised for his considerable contribution, and furthermore the database had been submitted to Headquarters in the UK for consideration for a wider roll-out internationally.

**Recommendation 2: The UK Border Agency should implement effective oversight of its correspondence management process, including the identification of trends, to improve service and decision quality.**

- 3.57 This recommendation was accepted by the Agency and has been closed by the Home Office. Earlier in this report I set out a number of actions being taken in both posts to improve the handling of correspondence and complaints.
- 3.58 In addition, I was told by managers and staff that all staff who deal with complaints have completed and passed the formal e-learning in Complaints Handling and that informal training has been supplied to other staff members not directly involved with the complaints procedure.
- 3.59 In Abu Dhabi and Islamabad, each complaint is seen by an Operations Manager, as well as by the casework Entry Clearance Manager who has personal oversight of each complaint. Complaints statistics are also monitored to confirm that the post is within its 20 working day customer service target for response times. I was pleased to see that, in both locations, these targets were being met.

**Recommendation 3: The UK Border Agency should raise staff awareness of the risk register, making it clear how they can contribute to it, in order to ensure that managers are alerted to potential, emerging or changing risks as early as possible.**

- 3.60 This recommendation was accepted by the Agency and has now been closed. I was told that, in response to this recommendation, the Agency issued an Operational Policy Instruction for all staff in July 2012 in order to raise awareness of risk registers. Staff

whom I spoke to both in Abu Dhabi and Islamabad were aware of the process they should follow to raise risks that they felt should be included on the register, and of its importance.

- 3.61 I was advised that this OPI would be recirculated to all staff on a six monthly basis to ensure that the profile of the risk register is maintained. I was pleased to note that, in both Islamabad and Abu Dhabi, staff were also given the chance to discuss the risk register in a number of different forums including town hall meetings, one-to-one meetings and through regular communications briefs.

**Recommendation 4: The UK Border Agency should ensure that it records a clear rationale for entry clearance decisions and adequate case notes generally, on its IT case working system, and adopts a consistent approach to the retention of supporting documents on file, in order to maintain a clear audit trail.**

- 3.62 This recommendation was accepted by the Agency and is now considered closed by the Home Office. However, as I did not undertake any consideration of files on this visit, I am unable to comment on progress made against this recommendation.

**Recommendation 5: The UK Border Agency should ensure that when applicants have followed published guidance, but Entry Clearance officers require further information to make a decision, applicants are given an opportunity to provide this.**

- 3.63 This recommendation was partly accepted by the Agency in certain circumstances and has now been closed by the Home Office. I sat with ECOs in both locations and they talked me through the process that they followed when considering applications. In both posts, staff told me that, where they required further evidence in addition to what had been submitted, they would, wherever possible, give the applicant the opportunity to submit it before they made their decision. This was extremely positive.
- 3.64 I did not examine any refusal notices, but was advised by managers that they no longer state that an applicant has been refused for failing to provide specific documents, when they have not been asked to supply them or been given an opportunity to provide them.

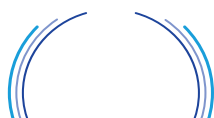
### **Additional developments**

- 3.65 I spoke to senior UK Diplomats in both posts (the Deputy Ambassador in Abu Dhabi and the High Commissioner in Islamabad). The view of both these Diplomats was that the service provided to visa applications at their respective posts had improved dramatically.
- 3.66 In Abu Dhabi, the Deputy Ambassador stated that there had been a 'sea-change' improvement since he had taken up his post. He identified a much stronger management team in Abu Dhabi and a keen, enthusiastic and motivated staff.
- 3.67 In Islamabad, the High Commissioner, nearing the end of his posting in Pakistan, commended the UKVI team and said there had been a dramatic improvement. He said that he now received a significant number of communications from Pakistani stakeholders with unsolicited praise for the team in Islamabad. He also told me that some senior Pakistani officials had recently described the UK operation in Islamabad as 'the best Western visa post in Islamabad'.

- 3.68 The High Commissioner said he was extremely impressed that the post was operating within targets and that, in his opinion, the quality of decision-making was improving (although I am unable to verify this). He had considerable praise for the Head of Section in Islamabad who, he said, had taken on an extremely difficult role at a difficult time and handled it excellently.
- 3.69 The views of these senior diplomats are in stark contrast to the views and opinions shared at the time of my earlier inspections and are a tribute to the efforts that have clearly gone into driving improvement.
- 3.70 Equally, without exception all staff whom I spoke to seemed happy in their work, content with the working environment and motivated and supported by their managers. I was pleased to note that locally engaged staff in Islamabad also shared this view. On my previous visit I had been concerned to hear locally engaged staff say that they felt excluded and as though they were treated less fairly than UK-based staff. This situation was obviously much improved. Evidence of a recent staff ‘away day’ in Islamabad, in the form of posters around the office indicating ‘bright spots’ – things being done well – and ‘baby steps’ – things to improve on – showed an inclusive and proactive environment where staff were encouraged to feed in their ideas.
- 3.71 Staff were also developed, and made to feel included, through a rotation system enabling them to experience different parts of the role. This was most apparent, as described earlier, in the process by which all ECOs were given the chance to work on appeals analysis to help inform decision-making, but can also be seen in the movement of staff between posts in the region. I spoke to a number of staff in Abu Dhabi who had done short spells in Islamabad, and also heard how the ECOs working in the remote spokes of Muscat and Doha were given the chance to work in Abu Dhabi for short periods. In addition to developing staff and building a one-team attitude, giving staff additional skills helps to build the overall resilience of the post, in the event of staff shortages or turnover.
- 3.72 In Abu Dhabi, the Regional Director had established a Better Management Team, which consisted of a range of staff from different grades and functions, who had volunteered to take part. This group appeared open, honest and friendly and gave staff the opportunity to feed thoughts, ideas and concerns directly into the management team, thus giving them a real feeling of participation. I sat in on one of these meetings, and asked the Chair (on this occasion, the Operations Manager) to leave the room so that I could speak to the rest of the group. They all agreed that the meeting was useful, positive and beneficial to the overall operation and productivity of the post and they valued taking part.

### **Areas of concern**

- 3.73 In both posts, some staff mentioned problems that were still being encountered using certain IT programmes. I am aware that these issues exist in a number of UKVI posts around the world, and that the Home Office is working to address these problems, but the availability of a fully functioning and task-appropriate IT system will help these staff to do their jobs more effectively.
- 3.74 Also, I was told of a situation developing at the moment relating to the family migration rule changes, and the deferment of decisions where the ECO would previously have refused on maintenance grounds. Due to a legal challenge (the ‘Javed ruling’) these cases are ‘paused’.
- 3.75 In order to be able to process cases, staff are encouraging applicants to provide additional documentation to evidence that the income threshold is met. Once this is submitted, the application can be assessed again by an ECO. Despite these efforts,



and through no fault of UKVI or staff in either location, I am concerned about the implications that the Javed ruling will have on the posts, particularly Islamabad. A significant number of cases have already been 'paused' until the outcome of the case and at the time of my visit, there were already 500 such cases in Islamabad. Considerable resource will be needed in Islamabad when these cases are able to be resolved, in order to prevent them turning into a long-term backlog.

- 3.76 There was some concern in Islamabad about the limit placed on the number of cases they could send for 'verification +' checks with HMRC (these checks verify things like employment history, etc). At present, UKVI are allowed to send 50 cases a week to HMRC in the UK for 'verification +' checks. Staff whom I spoke to in Islamabad said that this limitation meant they had to allocate cases sparingly, and they would benefit from being able to send considerably more to HMRC. The value of these checks is unquestionable and UKVI would benefit from negotiating a bigger allowance with HMRC.

## **Conclusion**

- 3.77 As mentioned in this report, I did not consider decision quality on this visit and did not undertake any file sampling, and thus am unable to comment on whether or not the quality of decisions being made in Abu Dhabi and Islamabad has improved. However, I did see considerable evidence that process management in both posts had developed, staff engagement and management techniques had improved and quality assurance mechanisms had been developed and implemented to ensure appropriate management oversight.
- 3.78 I have highlighted specific issues about IT and the implications of the Javed ruling; however, these are issues outside of the posts' direct control. What is reassuring is the effort being made by staff at both posts, not only to deliver a good service to applicants despite these issues, but also to plan and prepare for such issues in the future.
- 3.79 It was apparent to me that the customer-service focus being promoted by the current head of UKVI has been picked up and adopted enthusiastically by staff at these two posts. The renewed approach to the handling of complaints and correspondence and the recent award of Customer Service Excellence to Abu Dhabi are indicative of this new focus.
- 3.80 Overall, my spot-check visit to Abu Dhabi and Islamabad was positive. It was reassuring to see how much progress had been made since my inspections, and I was given a very clear impression of the commitment and determination of the new management team and their staff.

# Acknowledgements

I am grateful to the Home Office for its help and co-operation throughout the inspection and for the assistance provided in helping to arrange and schedule spot-check visits at the three locations.

**John Vine CBE QPM**  
**Independent Chief Inspector**  
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