



Home Office

**The Home Office response to the
Independent Chief Inspector of
Borders and Immigration report:**

**‘An Inspection of entry clearance
processing operations in Croydon
and Istanbul’**

November 2016 – March 2017

The Home Office thanks the Independent Chief Inspector of Borders and Immigration (ICIBI) for the recommendations in his report on entry clearance processing operations in Croydon and Istanbul.

The Home Office accepts three of the five recommendations in full and has partially accepted two of the recommendations. Responses to each of the recommendations are set out below.

Recommendation 1:

1. Develop a resourcing strategy for entry clearance Decision Making Centres (DMCs) that clearly identifies, values and rewards the experience, expertise and knowledge (including, where relevant, language skills) required to make high quality decisions, and encourages the retention of staff experienced in entry clearance work by ensuring that staff returning from overseas postings are retained for an agreed period upon return to the UK.

Accepted

- 1.1. The Home Office accepts this recommendation. UK Visas and Immigration (UKVI) already have a comprehensive resource strategy in place for resourcing our overseas operations. In 2013 UKVI established a cadre for Entry Clearance Officers (ECOs) and Entry Clearance Managers (ECMs). ECO and ECM grades overseas are made up of Home Office UKVI Cadre staff, FCO staff and Locally Engaged officers. ECO/M staff in the UK also include those recruited to work in Sheffield and Croydon specifically. The creation of the UKVI Cadre ensures that ECO/Ms on completion of an overseas posting can be retained within UKVI and can be posted to Decision Making Centres in either Croydon or Sheffield on their return to the UK, sharing the skills and experience (and local knowledge) acquired during their overseas tenure. Alongside this, UKVI Cadre staff can also be posted to work in the Visa Training Team and UKVI Central Operations Team where they also have the opportunity to share their knowledge and experience with both new staff and the wider overseas network.
- 1.2. In addition, UKVI Visas & Citizenship staff work within the framework of a Consecutive Postings Policy which limits staff to no more than two consecutive overseas postings. Under this approach staff must have completed a minimum of two years of work in the UK before being eligible for another overseas posting.

Recommendation 2:

2. Ensure that Decision Making Centres are correctly staffed at the Entry Clearance Manager (ECM) grade, in terms of numbers, experience and skills, to deliver not just the required levels of assurance but to be continuously improving the quality of initial decisions, through regular, constructive feedback to decision makers regarding both their good and poor decisions.

Accepted

- 2.1 The Home Office accepts this recommendation. UKVI is committed to ensuring that Decision Making Centres are correctly staffed at all levels. This includes at ECM grade, which is sourced from a combination of secondees from UKVI Cadre staff, staff from other government departments (primarily the FCO) and Locally Engaged staff. Both Sheffield and Croydon Decision Making Centres have also recruited location-specific ECMs. Where appropriate ECOs are provided with opportunities to

provide temporary cover at ECM level to both support our operations and enhance individual development.

Recommendation 3:

3. Review the 'Review to Risk' (R2R) quality assurance strategy for entry clearance decisions, and
 - a) address the failure of the 'baseline' regime to take account of the risk of 'confirmation bias' in relation to applications streamed 'Green' that result in a decision to issue
 - b) require each Decision Making Centre to report quarterly the 'additional/rotating' reviews it is planning and has completed, using this not only for quality assurance purposes, but as a 'health check' on resourcing, workflow and performance management actions.

Partially Accepted

- 3.1 The Home Office does not accept recommendation 3(a) because we do not agree with the report's conclusion that streaming applications determines how an Entry Clearance Officer makes a final decision and whether they issue or refuse a visa. For every application, regardless of its stream, an Entry Clearance Officer must carry out a range of decision-making functions before arriving at a decision, most notably an assessment of whether an application meets the requirements of the relevant Immigration Rules. This assessment includes wider credibility factors if relevant to that category of application.
- 3.2 We also do not agree with the assessment that our Review to Risk regime fails in this regard. It has been carefully designed to ensure assurance mechanisms for all applications, including those cases streamed Green and where a decision has been made to issue a visa. The latest Review to Risk regime was developed and introduced across all Decision Making Centres (DMCs) in April 2017 after these inspections were carried out. Included within the Baseline Review checks is file sampling of decisions in all streams and a daily random integrity and quality assurance check, which will include Green issued cases. DMCs can also use Tactical Operational Reviews to conduct further checks on issued Green cases as part of their wider frontline assurance work.
- 3.3 The Home Office accepts recommendation 3(b) in respect of quality assurance purposes. The current requirement for Tactical Operational Reviews (referred to by the ICIBI as additional/rotating reviews) is that when the Regional Operations Manager is satisfied and can evidence that decisions are robust and appropriate this is reported to UKVI's Central Operations Team. Any further checks on these cases can form part of the random sampling to ensure decision quality/integrity. This process is supported by local decision logs reviewed in conjunction with Immigration Enforcement International colleagues at monthly operational review meetings. The recommendation to report on these on a quarterly basis will be implemented within the next update to the standard overseas Review to Risk strategy.

Recommendation 4:

4. Review its file storage arrangements in the UK, establishing the extent of the problem with 'missing' files relating to immigration, asylum, nationality and customs casework, and create

an action plan, involving its commercial partner, that reduces the number of files that cannot be located.

Partially Accepted

- 4.1. The Home Office partially accepts the recommendation in respect of the arrangements for how the Croydon Decision Making Centre locates files in relation to overseas work. The ICIBI team inspected the UKVI Decision Making Centre in Croydon which utilises the Home Office storage facility administered by a third party provider. A number of files could not be located within the timescale provided by the ICIBI team and alternative application references were provided and the files located. A number of steps have been in place to strengthen how the Croydon DMC packs visa application forms for transfer within the UK to improve file retention.
- 4.2. As UKVI progresses with its development of digital processing for overseas applications, the requirement to retain hard copies of the VAF and relevant supporting documentation will diminish. In all application categories the VAF is now completed in electronic format and automatically linked to the Proviso case working system. Applications submitted in work, study and settlement categories for the vast majority of overseas customers are now processed digitally in Sheffield. Supporting documents submitted by the applicant are scanned by the commercial partner using a scanning system and viewed by the ECO via the scanning system cloud. Documents relevant to the decision are retained in a digital repository at the relevant decision making centre.

Recommendation 5:

5. Review with each Decision Making Centre how guidance regarding the required standards for records of entry clearance decisions is being interpreted and applied, in particular whether the use of templates and 'suggested wording' for different refusal reasons is striking the right balance between clarity, conciseness and consistency and full consideration of the relevant facts of each case.

Accepted

- 5.1. The Home Office accepts recommendation 5. Currently UKVI's Central Operations Team are undertaking a review of Issue notes included on Proviso with the aim of identifying a minimum standard that should be utilised based on the complexities of the case.
- 5.2. A wider review of refusal notices/decision letters for both in-country and out of country applications is also being undertaken on the forms that are in use for refusing applications. This review will also look at whether providing suggested wording for these letters would be of any value.