



Home Office

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

**A re-inspection of the Home Office's Reporting and Offender Management processes and of its management of non-detained Foreign National Offenders**

**October 2018 - January 2019**

**The Home Office thanks the Independent Chief Inspector of Borders and Immigration (ICIBI) for his report on the re-inspection of our Reporting and Offender Management (ROM) and non-detained Foreign National Offenders (FNOs) functions.**

The original inspections made six recommendations in respect of Reporting and Offender Management and eight in respect of the management of FNOs.

We welcome the overall findings and are pleased that the inspection found significant efforts had been made to improve the efficiency and effectiveness of ROM processes and that we had addressed five of the eight original recommendations about the management of FNOs, to the extent that they may now be closed. We recognise that the work to address the ROM recommendations had not progressed as far as we had hoped by the time of the fieldwork which informed this inspection, but good progress has been made subsequently and we are confident that this work is now coming to fruition.

The Home Office looks forward to continued engagement with the ICIBI and his team on the wider issues raised in the report.

We acknowledge the ICIBI's decision to make new recommendations and the Home Office accepts three of the four new recommendations and partially accepts one.

## The Home Office response to the recommendations:

### The Home Office should:

1. Review, and take the necessary actions to implement, without further delays, the “Open” recommendations from ‘An inspection of the Home Office’s Reporting and Offender Management processes (December 2016 – March 2017)’ and ‘An inspection of the Home Office’s management of non-detained Foreign National Offenders (December 2016 – March 2017)’

#### 1.1 Accepted

- 1.2 We are working towards closing all original recommendations swiftly. Timelines and progress for each are described below.

- (i) ***Define the responsibilities of Reporting and Offender Management (ROM) staff and relevant case working staff for progressing the cases of individuals subject to reporting restrictions to a conclusion, with comprehensive guidance, including service levels agreements between ROMs and caseworking units to ensure that ‘signposted’ cases and commissions are actioned within agreed timescales.***

1.2.1 We have developed case triage tools (TRaM - Triage Management tool - and IPIC - Identify and Prioritise Immigration Cases) to assess the removability and level of harm posed by immigration offenders, automate the identification and prioritisation of cases, and to provide information on the length of time a barrier to removal has been in place. These tools will ensure that the process of prioritising cases is consistent between Reporting Centres and Casework units. We are pleased that the report reflects the positive reception that both TRaM and IPIC have received from our staff and, we see these new capabilities as crucial to our success going forward. Following evaluation of the IPIC exercise in Solihull in December 2018 a decision has been made to roll out IPIC to caseworkers and reporting centres in 2019/20. IPIC will enrich the Managed Reporting Appointments tool (see paragraph 1.1.3 below) which is already bedding in as business as usual. We expect this recommendation will be closed during 2019/20.

- (ii) ***Determine the most effective way(s) to identify changes in the circumstances of individuals subject to reporting restrictions and develop processes and guidance to ensure this is done early and consistently, and that any changes are accurately recorded.***

1.2.2 The Manage Reporting Appointments (MRA) tool, which has now been rolled out across the UK, will allow the teams in Reporting Centres to spend more meaningful time with people who are new to reporting, to discuss and identify any issues of concern or changes in circumstances.

1.2.3 At the time of the re-inspection the team was still bedding in the automated triage of reporting events; from testing to live service. We accept that there is more work to do to realise the benefits of this automation, but would not have expected to have been much further forward than we were at that point. Since the report was received in January, the technical rollout of automation was completed in February at all reporting centres nationally (five weeks ahead of schedule) and the resultant business model which enables more meaningful interventions has been implemented and evaluation has started. The automated process is already making a significant improvement to the length of time those reporting have to wait to be seen, as well as to our ability to intervene where it can make

a difference. This work is now complete and the benefits will continue to be monitored closely.

- (iii) ***Ensure that Reporting and Offender Management (ROM) staff receive the necessary safeguarding training and support to identify where individuals subject to reporting restrictions are at risk.***

1.2.4 Our vision is to have a Borders, Immigration and Citizenship System which is accessible to everyone it interacts with and which fairly addresses their individual needs. Automated reporting is a key part of this human face agenda as it allows our teams to spend more quality time with a smaller proportion of those who are reporting. That is why we are upskilling our people to have more meaningful conversations with those new to reporting; those who are vulnerable – in line with our new vulnerability strategy; and those who may be amenable to returning voluntarily. We will also make it clear that someone who is reporting can speak to an officer when they need to, even if an intervention is not scheduled. Staff undertake mandatory safeguarding training and will receive a newly developed training package on vulnerability by the end of the summer, at which point this recommendation will be closed.

- (iv) ***Improve data about the reporting population, and through regular analysis identify and agree (between Reporting and Offender Management (ROM) and case working units) which individuals are removable, which should be prioritised for a reporting event, the precise purpose of that event, and how to reduce the detentions to removals 'attrition rate'.***

1.2.5 IPIC has developed three rules: voluntary departure intervention; emergency travel documentation intervention; and detention on reporting. IPIC will be fed by caseworking units and will push cases into the relevant reporting centre at the optimum time to undertake the proposed action. Part of the benefit realisation of IPIC will allow caseworking units and reporting centres to get a better understanding of, and grip on, the flows of cases to ensure that those people who are scheduled for removal to their home country are appropriately prioritised. This action will be closed in the next financial year.

- (v) ***Based on improved data collection and analysis of the reporting population, develop a strategy to target promotion of voluntary return options more effectively, including to individuals reporting at police stations by publicising and promoting voluntary return schemes at these locations.***

1.2.6 The Department accepts that there is more to do to improve the take up rate of voluntary returns and are committed to achieving this through a specific programme of work across Immigration Enforcement and the wider immigration system. This work is overseen by a Programme Board which is chaired by the Director General of Immigration Enforcement. Specifically, in reporting centres, we are displaying voluntary departure promotional material and utilising the resources freed up by automation to conduct additional voluntary departure interviews with potential beneficiaries of the scheme and we have upskilled our staff to do this. We also plan to use the IPIC tool to identify people who may be suitable for promotion of a voluntary departure. Closure of this recommendation is expected once the MRA business model and IPIC are fully rolled out during 2019/20.

1.2.7 We need to be clear on the relationship with the police in relation to reporting and offender management. We are very much guests when using police facilities and cannot mandate the availability or display of Immigration Enforcement materials. In addition, having police staff or officers deal directly with immigration reportees is a last resort and we do not think that we should ask them to do more. We recognise that police reporting is

less efficient than the use of Home Office buildings and the facilities on offer can be less than ideal for the full range of ROM functions. For this reason, we are fundamentally reviewing how we use police stations for reporting and expect to make recommendations around this by the end of May.

- (vi) ***Conduct a fundamental review of the failure to report and absconder processes and confirm that: aims and objectives are clearly defined, along with relevant success criteria; the priorities of relevant Home Office teams and other agencies (e.g. the police) are aligned; assurance measures are in place to monitor the processes and to measure effectiveness.***

1.2.8 The Department is pleased that the report has acknowledged the comprehensive review and analysis undertaken relating to the management of 'out of contact cases'. There are plans to pilot in mid-May 2019 the use of SMS (text messaging) as part of the failure to report process. Subject to evaluation findings, we envisage national rollout during 2019-20.

1.2.9 The re-inspection report acknowledges that we built on the original recommendation to focus not just on the failure to report process, but rather to adopt a BICS-wide approach, recognising that tackling absconding cuts across many areas of the business, not just reporting centres. Following on from completing our review, we are finalising our recommendations for discussion and sign off in the coming weeks, which will then see the project move from the 'design phase' to 'implementation', with changes introduced in this financial year. Our plans will include resourcing requirements to support implementation, in terms of capability and capacity, and first and second line assurance requirements to support monitoring of future processes.

- 1.3 Regarding management of the FNO operation, the closure of five of the original eight recommendations represents our progress in delivering recommendations and action points generated by the Gold Group, Professional Standards and Operation Zincs reports which were examined as part of the Independent Chief Inspector's previous inspection.

1.3.1 The Department recognises the importance of providing the right tools to enable its people to operate effectively; the report reflects progress made since the previous inspection in our updated guidance and improved training. We will continue to develop our approach through delivery of our People Strategy and focus on the completion of this work through an ongoing review and continuous improvement programme.

- (vii) ***The Home Office should prioritise the development of the Person Centric View (PCV) for non-detained Foreign National Offender case working records, fixing a date for its delivery, and ensuring in the meantime that CC's information management is not reliant on disparate spreadsheets.***

1.3.2 We remain committed to moving towards digital ways of working, such as the Person Centric View, and to maximising efficiency where we continue to rely on interim manual systems. Our recent investment in a major continuous improvement project identified opportunities to simplify processes, reduce hand-offs and remove duplication in a number of areas. As we deliver the recommendations made in this project we will continue to develop a streamlined operating model which will include reduced reliance on local spreadsheets, where possible.

- (viii) ***The Home Office should systematically quality assure all case notes in respect of Foreign National Offenders to ensure that accurate, up to date records are being maintained.***

1.3.3 The report summarises actions taken since the previous inspection to assure the quality of case notes. The Department recognises the importance of maximising its performance both in respect of its own operating standards and the accuracy of information it provides to stakeholders. As part of this activity we are implementing improvements to our Quality Assurance Framework following an internal assurance review and our investment in specialist assurance training. We are also strengthening a network of Data Quality Champions embedded in casework teams, our “Dip” sampling of randomly selected detained cases started in January 2019. Our next step in this ongoing process will be to implement feedback loops to case workers and their managers, highlighting lessons learned and trends.

**2. Revisit its response to the recommendation that it should “analyse, and continue to monitor, re-offending rates for Foreign National Offenders, distinguishing between those released to a specified address and those released to no fixed abode, to ensure that measures introduced to create a ‘hostile environment’ for individuals with no right to remain in the UK are not having a perverse effect on FNO reoffending.”**

**2.1 Accepted**

- 2.2 The Independent Chief Inspector recommends that the Department reconsiders its previous response to not accept recommendation 5 of the last inspection report.
- 2.3 We are not aware of evidence to show a correlation between lack of access to accommodation as a result of Home Office measures and increased re-offending rates as suggested in the original inspection report. However, we recognise the potential value of better overall data on FNO re-offending rates. We will explore options available from existing data collated by Ministry of Justice (MoJ) colleagues. There are established mechanisms to access their information, with reciprocal arrangements to share Home Office data. Work is already underway to develop further our data sharing arrangements with partners including the MoJ.
- 2.4 We will continue to explore ways to fully exploit our existing working relationships with all our partners across Government, and, our future approach will be informed by the findings of the Independent Chief Inspector’s report on Home Office (BICS) Collaborative Working with Other Government Departments and Agencies.
- 2.5 We also accept there are opportunities to improve compliance and contact management of those FNOs released to no fixed abode. To address this, we will conduct an internal review to further tighten up reporting controls in these cases.

**3. Ensure that the number of reporting individuals without an allocated case “owner” is kept to an absolute minimum and in the case of non-detained Foreign National Offenders (FNO) that it does not exceed 1% of that population in any month.**

**3.1 Partially Accepted**

- 3.2 We are pleased the Independent Chief Inspector confirmed closure of his original recommendation on the basis of our existing assurance processes. We are partially accepting this recommendation as we are not aware of a basis for the 1% figure; we will however continue to refine our approach to deliver further improvements in data error reduction and will monitor future performance in order to assess the appropriate level for FNOs without a case owner. This includes a project to restructure mechanisms and

governance for data handling and performance reporting in IE Criminal Casework as part of our wider transformation planning.

**4. Expand the 'First Reporting Event Questionnaire – Form FRE1' question set to ensure that all vulnerabilities are captured and used to inform the future frequency of safeguarding conversations.**

**4.1 Accepted**

4.2 As part of the rollout of our new automated reporting system and resultant operating model we have introduced a first-time reporting event interview. We have developed a questionnaire which highlights a number of areas for enquiry which will enable us to seek information to assist in assessing a person's safeguarding or medical requirements, and their potential vulnerability. This will allow us to take a case-by-case approach as to how often we need to conduct change of circumstance interviews with each individual, prioritising them by their needs and progressing cases toward removal. This questionnaire is intended to be an aide-memoire for an effective interview tailored to individual circumstances, rather than an exhaustive list of questions. However, we will now expand this questionnaire to address this recommendation ensuring it fits with our new vulnerability strategy and is in line with the commitments made by the HO in its response to the [Vulnerable Adults report](#), published in January 2019 (specifically on the identification/safeguarding of vulnerable adults).