



An inspection of the Home Office's Network Consolidation Programme and the “onshoring” of visa processing and decision making to the UK

September 2018 – August 2019

David Bolt

Independent Chief Inspector of
Borders and Immigration

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ISBN 978-1-5286-1685-0

CCS1019256308 02/20

Printed on paper containing 75% recycled fibre content minimum.

Printed in the UK by the APS Group on behalf of the Controller of Her Majesty's Stationery Office.

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To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

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Foreword

Since January 2008, the Home Office has closed over 100 overseas Decision Making Centres (DMCs). At the time of writing (September 2019), only ten overseas DMCs remain and visa decision making is now concentrated in the UK, primarily in Croydon and Sheffield, with some visa decisions also made in Liverpool.

This inspection examined UK Visas and Immigration's (UKVI) programme of 'network consolidation' (sometimes referred to as 'onshoring'). It sought to establish whether the processes for closing and reducing the number of overseas DMCs were efficient and effective, and what effect recent DMC closures had had on UKVI's performance, including the timeliness and quality of its decisions.

The closure of overseas DMCs has concerned a number of stakeholders, including the Foreign and Commonwealth Office (FCO), and the education, tourism and business sectors. At the macro level, the concern is about the UK's international reputation and whether it appears 'open for business' and welcoming. There are also concerns about the effects on decision quality, particularly in light of the loss of local knowledge.

Inspectors saw little evidence to support the local knowledge argument. Equally, UKVI had not attempted any systematic gathering and analysis of evidence of decision quality 'before' and 'after' a DMC was consolidated so that it could be refuted and the 'benefits realisation' case made. Much of the relevant input data (staff and related costs, such as travel, subsistence) and output data (performance, beyond adherence to the Customer Service Standard) was either not captured or captured inconsistently.

The 'Streaming Tool' used by UKVI to manage intake also came in for criticism and the Home Office needs to make an effort to demystify the Tool and how it works to try to address stakeholders' concerns about its influence on decision making.

Greater transparency is needed in relation to the workings of Visa Application Centres, which are also heavily criticised by some stakeholders. As the Home Office has sought to shrink its overseas footprint, the outsourcing of 'front end services' to commercial partners makes perfect sense. Numerous other countries have followed the same path. But, the Home Office needs to demonstrate that it is committed to ensuring that this key stage of the application process is working efficiently and effectively.

In 2016, the Home Office closed eight DMCs, in 2017 it closed a further four, in 2018 another three, and in 2019 (to September) another one. Meanwhile, all net migration applications have been onshored to the UK. It is therefore somewhat surprising that the 2018 Immigration White Paper was silent on network consolidation and the onshoring of visa decision making. It appeared that the last occasion on which ministerial approval had been formally sought for the Network Consolidation Programme was in 2016, since when there has been significant turnover in ministers and senior officials. I have therefore recommended that the Home Office confirms that ministers continue to support the Programme and specifically the planned Phase 2 DMC closures.

Clearly, from a 'UK PLC' perspective, the arguments advanced by the FCO and others about the UK's reputation overseas as an attractive destination for visitors, business and international students need to be given appropriate weight when deciding on any further DMC closures. But, solely in terms Home Office efficiency and effectiveness, the logical extension of the network consolidation strategy to date is to close all remaining overseas DMCs as soon as the UK DMCs are staffed and equipped to take on this work. However, UKVI has made it clear in responding to this report that this is my opinion but it is not its current policy.

Whether the Home Office continues with Phase 2 of the Network Consolidation Programme as planned, and in due course goes further, it needs to do more to evidence that its actions not only save it money but that the results are at least as efficient (in terms of timeliness, but also of ease of access and use by applicants, accuracy and fairness) and effective (serving not just the Home Office's objectives but those of UK PLC). This will require better performance data than the Home Office currently collects, better analysis, and better communication about its thinking and short-, medium- and long-term plans for processing visa applications.

This report contains five recommendations. It was sent to the Home Secretary on 23 September 2019.

David Bolt
Independent Chief Inspector of Borders and Immigration

1. Scope and purpose

- 1.1** This inspection examined UK Visas and Immigration’s programme of ‘network consolidation’ (sometimes referred to as ‘onshoring’) with a view to establishing whether the processes for closing and reducing the number of overseas Decision Making Centres (DMCs) were efficient and effective, and what effect recent DMC closures had had on UKVI’s performance, including the timeliness and quality of its decisions.
- 1.2** Inspectors looked at this from three key perspectives:
- Strategic direction and Governance
 - Performance and Assurance
 - Communication and Consultation

2. Methodology

2.1 Inspectors:

- reviewed relevant open source material, including previous inspection reports
- between September and November 2018, met representatives from the Foreign and Commonwealth Office (FCO) Estates team, the National Audit Office, the UK Council for International Student Affairs (UKCISA), the Tourism Alliance, and a private law firm specialising in assisting ‘high-end’ clients
- during November and December 2018, analysed over 600 pieces of documentary evidence provided by the Home Office in response to ICIBI’s preliminary evidence request
- in November 2018, visited the relevant Home Office units in Croydon and Sheffield in order to finalise the scope of the inspection
- on 29 January 2019, via a ‘diplomatic telegram’, issued a ‘call for evidence’ to Heads and Deputy Heads of UK Missions overseas, seeking submissions in particular regarding the Home Office’s engagement with the FCO about its network consolidation programme
- on 12 February 2019, issued a public ‘call for evidence’ via the ICIBI website seeking submissions from anyone with knowledge or experience of visa processing and decisions ‘before and after’ the work was ‘onshored’
- between 25 February and 20 March 2019, visited four DMCs, Croydon, Manila, Sheffield and Warsaw, and conducted 50 interviews and focus groups, involving all grades from Administrative Officer to Senior Civil Servant (Director), including Immigration Enforcement International, and representatives from the FCO, the British Council, the National Crime Agency, and the Department for International Trade
- finally, analysed the documentary evidence provided by the Home Office in their formal evidence submission and, where necessary, sought further evidence to test and triangulate the inspection findings

2.2 On 8 May 2019, the inspection team presented its emerging findings to the responsible Home Office SCS and their team.

2.3 At the beginning of August 2019, the Independent Chief Inspector visited the Croydon DMC for a walkthrough of the Streaming Tool and decision making and assurance, plus discussions with senior management, with a particular focus on African Visitor Visas. Also in August 2019, ICIBI had a further meeting with UKCISA.

3. Summary of conclusions

- 3.1** Between January 2008 and October 2018, the Home Office closed 101 overseas Decision Making Centres (DMCs). By the end of 2018, just 11 overseas DMCs remained,¹ along with two UK DMCs, in Croydon (opened in 2009) and Sheffield (opened in 2012), with some visa decisions also made in Liverpool.
- 3.2** Over the same period, the number of visas processed annually by the Home Office grew substantially. A Home Office Statistical Bulletin,² published in August 2010, put the total number of entry clearance visas of all types issued in 2008 at 1.95 million. According to the data provided for this inspection, in 2018 the Home Office ‘resolved’³ 3.4 million visa applications, the majority being Visitor Visas.
- 3.3** During 2007, the Home Office began to restructure its overseas visa operation into a ‘hub and spoke’ model, with applications received at smaller posts (the ‘spokes’) being passed to a larger regional DMC (‘hub’) to decide whether to grant or refuse the visa. This was intended to improve the quality and consistency of decision making, improve efficiency and productivity, and provide greater resilience and flexibility. It was also intended to reduce the Home Office’s operating costs.
- 3.4** In 2015, against the backdrop of the ‘Spending Review and Autumn Statement 2015’, which required the Home Office to make “resource savings of 5% by 2019-20”, this process evolved into the Network Consolidation Programme. Provided the essential ‘front end services’ (biometric data capture and visa issuing) could be managed efficiently and effectively, an online visa application process meant decision making need not be tied to a particular location, and since operating costs were lower in the UK than overseas it was logical to look to ‘onshore’ decision making to the UK unless there was a good reason not to. And, it followed that the consistency and decision quality arguments that applied to the hub and spoke model were equally relevant to onshoring.
- 3.5** Prior to 2015, when the work from a closing DMC was onshored it was transferred mostly en bloc to either Croydon or Sheffield.⁴ However, as more DMCs closed and the Croydon and Sheffield DMCs grew in size, the Home Office decided it would be more efficient if visa processing and decision making were done ‘thematically’, according to visa type or ‘route’, rather than by country of application.
- 3.6** Sheffield was identified as the thematic hub for all Points Based System (PBS) Tier 4 (Student) applications, including those made from within the UK, and at the time of this inspection it was due to host the ‘Work & Family Hub’, dealing with PBS Worker applications (Tiers 1, 2 and 5) and Settlement applications (Spouse and Family members). Croydon was established as the hub

1 The Bogota DMC closed in April 2019, leaving 10 overseas DMCs.

2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/116016/hosb1510.pdf

3 Where a decision to grant or refuse had been made.

4 At the factual accuracy stage, the Home Office commented that: “Applications were pointed to Sheffield by route before 2015: for example the first applications handled by Sheffield were settlement applications lodged in the USA and Nigeria.”

for Visitor Visa applications. Meanwhile, European applications (EEA Family permits, etc.) were directed to Liverpool.

- 3.7** The move to thematic hubs was described to inspectors as still in its infancy and Phase 1 of the Network Consolidation Programme had taken longer to complete than planned. Both Croydon and Sheffield had experienced problems. In Croydon's case, these revolved around recruiting and retaining sufficient staff and managers, which had been a concern when Croydon was last inspected in 2017.⁵ Meanwhile, Sheffield had failed to cope with the pace at which work was being onshored to it in the first half of 2017, resulting in some applications being redirected overseas and some overseas staff being temporarily detached to Sheffield to help out.
- 3.8** By 2019, Sheffield appeared to be on top of its current workload, while managers at Croydon told inspectors in August 2019 that staffing levels were not currently an issue. Nonetheless, the Home Office recruitment process was widely criticised as slow, particularly the security vetting of new joiners and, along with the rollout of updated IT (ATLAS) and secure technologies for uploading supporting documents and printing vignette visas, this had a bearing on the UK DMCs' readiness to take on further onshoring.
- 3.9** UKVI managers were aware that the Sheffield experience had damaged UKVI's reputation with its own staff overseas, with the FCO (inspectors heard that at least one Head of Mission had cautioned against onshoring unless Sheffield was certain it could cope, and felt his concerns had been brushed aside only for some of the work to bounce back) and with stakeholders, particularly those in the education sector where the impact on Tier 4 Student Visa applications had been most keenly felt.
- 3.10** On the plus side, following an internal review, led by the HM Passport Office Chief Operating Officer, the governance of the network consolidation process was strengthened, and this inspection found that the Consolidation Board appeared to be providing an appropriate level of oversight, supported by a Technical Working Group and Business Readiness Group, albeit the Board needed to maintain better records of its meetings and decisions.
- 3.11** In terms of its reputation, UKVI had made concerted efforts to reassure the education sector that 2018 would not see a repetition of 2017 and followed through on its promises. According to its own data, in 2018 it resolved 98.5 per cent of Tier 4 applications within the 15-day Customer Service Standard. The sector acknowledged that 2018 and 2019 had run more smoothly, although stakeholders remained concerned about the extent of credibility checking and UKVI's competence to assess credibility.
- 3.12** Planning and development for Phase 2 of the Network Consolidation Programme began in mid-2018. In November 2018, UKVI senior management decided on further reductions that would see five more overseas DMCs close in 2019-20 and 2020-21, leaving just six. The planned closures were announced to staff via a global email in November 2018. However, the information had already leaked to one of the affected posts, Manila. Inspectors spoke to UK-based and locally-engaged staff at Manila and at Warsaw, another of the posts scheduled for closure. The locally-engaged staff, in particular, were keen to receive more details about when exactly the DMC would close and what they could expect to receive in compensation for the loss of their jobs. However, UKVI had yet to work these details out.

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/631520/An-inspection-of-entry-clearance-processing-operations-in-Croydon-and-Istanbul1.pdf

- 3.13** The closure of overseas DMCs has been of concern to a number of stakeholders, including the FCO, and the education, tourism and business sectors. At the macro level, the concern is about the UK's international reputation and whether it appears 'open for business' and welcoming. There are also concerns about the effects on decision quality, particularly in light of the loss of local knowledge. Decision makers and managers also raised loss of local knowledge as an issue. However, UKVI management was less convinced, pointing to the body of outcome-based data that UKVI had amassed that enabled it to make more consistent and evidence-based decisions.
- 3.14** Inspectors saw little evidence to support the local knowledge argument. Equally, UKVI had not attempted any systematic gathering and analysis of evidence of decision quality before and after a DMC was consolidated so that it could be refuted and the 'benefits realisation' case made. Based on the responses to inspectors' requests for evidence, much of the relevant input data (staff and related costs, such as travel, subsistence) and output data (performance, beyond adherence to the Customer Service Standard) was either not captured or captured inconsistently. Where there were warning signs, for example increases in 'complexed' applications and in the number of Administrative Review applications resulting in an overturned decision, there was no evidence that this had been examined.
- 3.15** Since 2015, Visas & Citizenship (V&C) has been using a Streaming Tool to assess and 'RAG-rate' the risks and levels of potential immigration harm attached to individual visa applications. Some stakeholders remain deeply suspicious of the Streaming Tool, believing that it unfairly discriminates against particular applicants, resulting in high levels of refusals. In 2017, ICIBI also raised concerns, strongly rebutted by UKVI, about whether the Streaming Tool was becoming "a de facto decision-making tool".
- 3.16** At the time of this inspection, V&C was using Version 3 of the Streaming Tool. Inspectors reviewed the accompanying internal guidance and observed the Tool in action. As well as speaking to V&C senior management about how the Streaming Tool works and is updated, inspectors spoke to Entry Clearance Assistants (who input the applicants' data and generate the RAG rating), to Entry Clearance Officers (who consider the RAG-rated applications and decide whether to grant or refuse), and to Entry Clearance Managers (who validate proposed decisions that are not in line with the RAG rating).
- 3.17** Inspectors were confident from these interviews and observations, together with data on grant rates, that applications streamed RED were not automatically refused and that, having assessed the application individually and, where necessary, tested the evidence, decision makers were comfortable in recommending a visa be granted. However, given the 'daily expectation' levels and the near 100 per cent grant rates (in Croydon inspectors were told the rate was 99.5 per cent), and a limited capacity for quality assurance, it was less clear that all applications streamed GREEN were being assessed on their individual merits.
- 3.18** Whatever the true effects of the Streaming Tool on the way decision makers approach their task, V&C needs to make an effort to demystify the Tool and how it works to at least try to address stakeholders' concerns. There may be elements to this that are sensitive, because they involve political rather than immigration considerations, but the more that V&C is able to be transparent about the Streaming Tool the better it will be able to show that its decision making is evidence-based and fair.
- 3.19** Greater transparency is also important in relation to the workings of the Visa Application Centres (VACs), which are also heavily criticised by some stakeholders. As the Home Office has

sought to shrink its overseas footprint, the outsourcing of ‘front end services’ to commercial partners makes perfect sense. Numerous other countries have followed the same path.

- 3.20** But, although they have no decision-making powers, the VACs are still performing an immigration function, since the application process relies on them. Therefore, the Home Office remains accountable for them working efficiently and effectively and meeting applicants’ needs. As such, it must do more to show that it has heard and acted upon the various complaints, about the availability of appointments for example. This inspection had neither the capacity nor enough information to examine the working of the VACs and the Home Office’s oversight and management in detail, and this merits its own inspection at some point.
- 3.21** From the evidence provided to inspectors, it appeared that the last occasion on which ministerial approval had been formally sought for the Network Consolidation Programme was in 2016, since when there has been significant turnover in ministers and senior officials.⁶ In 2016, the Home Office closed eight DMCs, in 2017 it closed a further four, and in 2018 another three. Meanwhile, all net migration applications have been onshored to the UK. However, the 2018 Immigration White Paper was silent on network consolidation and the onshoring of visa decision making.
- 3.22** Of the 11 overseas DMCs that remained open at the time of this inspection, the Home Office had already decided that it will close five in Phase 2 of the Programme: Bogota, Chennai, Manila, Riyadh, and Warsaw. It regards the cost-saving argument as overwhelming, albeit it cannot quantify it precisely. Other arguments, such as the UK’s reputation overseas, advanced by the FCO and others, carry less weight with the Home Office and stakeholders do not believe the Home Office is actively listening to them.
- 3.23** The Home Office needs to do more to evidence that its network consolidation strategy not only saves it money but that the results are at least as efficient (in terms of timeliness, but also of ease of access and use by applicants, accuracy and fairness) and effective (serving not just the Home Office’s objectives but those of UK PLC). Logically, it should be aiming to close all remaining overseas DMCs and to onshore all visa decisions to the UK. However, this will require better performance data than the Home Office currently collects, better analysis, and better communication about its thinking and short-, medium- and long-term plans for processing visa applications.

⁶ At the factual accuracy stage, the Home Office clarified that: “The decision to close Moscow was submitted to Ministers on 6 April 2018.” This decision was taken because of diplomatic relationship issues but the submission also stated: “We are in the process of consolidating all work, study, family routes (‘net migration’) to the UK by the end of 2018. In addition, and as part of our rationalisation of the overseas visa network, we had also been planning to onshore some visits.”

4. Recommendations

The Home Office should:

- 4.1** Confirm that the Network Consolidation Programme, and specifically the planned Phase 2 Decision Making Centre (DMC) closures, continues to enjoy ministerial support within the Home Office and, having done so, that it is fully understood by other government departments and other key stakeholders.
- 4.2** By the end of 2019-20, produce (at least in outline) proposals for Phase 3 of the Network Consolidation Programme covering further DMC closures/onshoring and timescales, and share this with affected staff and stakeholders as part of a revised and more inclusive communication and consultation strategy.
- 4.3** Both for internal 'benefits realisation' purposes and to evidence to stakeholders that standards have been maintained (or improved), ensure that sufficient data is collected for all future DMC closures/onshoring to enable a meaningful before and after comparison of operating costs (staff and staff-related costs, Foreign and Commonwealth Office (FCO) charges, other costs) and performance (not solely against the Customer Service Standard but including some measurement of decision quality).
- 4.4** Including as much detail as possible, publish an explanation of how the Streaming Tool works, avoiding jargon and opaque language, and establish an auditable review and assurance system that covers all three RAG ratings, using the outputs to build stakeholder confidence in the Streaming Tool and the way it is used.
- 4.5** Publish on GOV.UK service standards and performance data for the Visa Application Centres (VACs) (in addition to anything published by the commercial partners themselves), covering availability of appointments, average waiting times, and any other factors affecting the 'customer experience', together with any agreed improvement plans for particular VACs.

5. Background

Entry clearance

- 5.1** For those requiring permission to enter or remain in the United Kingdom, permission is granted (or refused) overseas by Entry Clearance Officers (ECOs), at the border by Border Force officers, and in-country by the Home Office (UK Visas and Immigration) on behalf of the Home Secretary.⁷
- 5.2** Under the Immigration Rules, citizens of some countries (non-visa nationals) are able to seek permission to enter the UK when they arrive, depending on the purpose and duration of stay. However, at the time of this inspection, citizens from 111 countries,⁸ and those seeking to stay in the UK for work or to study or settle, were required to obtain entry clearance prior to arrival.⁹
- 5.3** UKVI’s webpage on GOV.UK explains: “Entry clearance is the procedure used by Entry Clearance Officers at British missions overseas to check, before a person arrives in the UK, if that person qualifies under the Immigration Rules for entry to the UK. In some cases entry clearance is mandatory, in others it is optional.”¹⁰
- 5.4** Between 1 April 2018 and 31 March 2019, UKVI received over 3.35 million entry clearance visa applications and issued almost 3 million entry clearances – see Figure 1.¹¹ The majority of the applications were for Visitor Visas.

Figure 1 Total number of entry clearance applications received by financial year 2015-16 to 2018-19¹²

Year	Applications	Resolved	Granted	Refused	Withdrawn	Lapsed
2015-16	2,833,325	2,839,278	2,454,153	376,412	7,631	1,082
2016-17	2,978,877	2,948,632	2,547,336	394,589	6,431	276
2017-18	3,059,331	3,054,617	2,707,293	337,576	9,654	94
2018-19	3,351,399	3,354,091	2,959,631	385,861	8,528	71

7 ECOs and Border Force officers operate under powers granted by the 1971 Immigration Act.

8 <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-v-visitor-rules>

9 At the factual accuracy stage, the Home Office pointed out that: “Non-visa nationals who are seeking entry to work under ‘Visit-PPE’ and ‘Tier 5’ for not more than three months can seek entry at the border. This is also the same for those non-visa nationals wishing to undertake short-term studies of 6 months or less (Para 57A-H).”

10 <https://www.gov.uk/government/publications/what-is-entry-clearance-ecb03/ecb3-what-is-entry-clearance>

11 <https://www.gov.uk/government/publications/immigration-statistics-year-ending-march-2018/summary-of-latest-statistics>

12 <https://www.gov.uk/government/statistics/immigration-statistics-year-ending-march-2019-data-tables>

Hub and Spoke model

- 5.5** Historically, most visa applications were received, and decisions made to grant or refuse, at the British Embassy or High Commission in the country where the applicant resided. During 2007, the Home Office began a restructuring of its overseas visa operation into a hub and spoke model, which involved the applications received at smaller visa posts (the spokes) being passed to a larger regional Decision Making Centre (DMC) (hub) for a decision. Each hub serviced several spokes, as well as receiving in-country applications. Applications and decisions were couriered between the spokes and the hubs.
- 5.6** The hub and spoke new model aimed to deliver three main benefits:
- improved quality and consistency of decision making
 - improved efficiency and productivity
 - greater resilience and flexibility¹³
- 5.7** Between January 2008 and October 2018,¹⁴ implementation of the hub and spoke model meant that the number of overseas DMCs reduced from 112 to 11. The posts closed between 2008-2018 are listed at Annex A. The overseas DMCs in operation at the end of 2018 are at Figure 2.

Figure 2 Overseas DMCs in operation as at 31 December 2018

Location	Country
Abu Dhabi	United Arab Emirates
Amman	Jordan
Beijing	China
Bogota	Colombia
Chennai	India
Istanbul	Turkey
Manila	Philippines
New Delhi	India
Pretoria	South Africa
Riyadh	Saudi Arabia
Warsaw	Poland

- 5.8** During this period, two DMCs were established in the UK, one in Croydon (opened in 2009) and the other in Sheffield (opened at the end of 2012).

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/631520/An-inspection-of-entry-clearance-processing-operations-in-Croydon-and-Istanbul1.pdf

¹⁴ At the time of this inspection, the last post to be closed was New York in October 2018.

Online applications

- 5.9** At the same time as implementing the hub and spoke model, UKVI was investing in technology to enable it to work in smarter ways. In the past, visa applicants had been required to submit a completed paper application form, along with any original supporting documents they wished to include for consideration. However, from the early 2000s, the Home Office began to roll out online visa applications and this had since become the norm.
- 5.10** Having completed and submitted the application form online, and paid the application fee electronically,¹⁵ the process requires the applicant to attend a Visa Application Centre (VAC) to provide their biometric details.

VACs

- 5.11** Like many countries, the UK has contracted its front-end visa services to commercial suppliers. Two commercial suppliers, VFS Global¹⁶ and Teleperformance, between them manage a network of over 230 overseas VACs on behalf of UKVI.¹⁷ The latest contracts were signed in 2014 and run until March 2021, with the option of a two-year extension to 2023. A list of VACs is available on GOV.UK under 'Find a visa application centre'.
- 5.12** Most VACs are located in major cities, often in city centre shopping malls or other retail areas, and there are also some Temporary Enrolment Locations (TEL) offering the same services, but with restricted opening times and additional charges for appointments. The intention is that VACs are readily accessible to the largest number of potential applicants. However, some applicants still have to travel considerable distances from other cities or, in some cases, other countries to reach their nearest VAC. Stakeholders have pointed out that this has the effect of being discriminatory and that it puts the most vulnerable applicants, such as those applying for refugee family reunion, at significant additional risk.

The VAC process

- 5.13** Once an applicant has submitted an online application and paid the associated fee, they will be offered a choice of appointment slots to attend a VAC, where they will enrol their biometrics and submit their passport. In early 2019, pilots were underway in a number of locations to test software to allow visa applicants to upload their own supporting documents free of charge. Where applicants are not able or choose not to self-scan and upload documents they can have the VAC do this for them for a fee.¹⁸
- 5.14** According to the Home Office, at the time of this inspection under five per cent of all the applications considered by ECOs were paper-based rather than digital. In the majority of cases, decision makers relied on scanned copies rather than the actual documents. Decision makers in the Croydon and Sheffield DMCs had access to digitalised documents stored in separate locations for the two commercial partners.

¹⁵ At the factual accuracy stage, the Home Office commented that some routes, for example, EEA Family Permit and Family Reunion, do not attract a fee, while some visa applicants are required to pay the Immigration Health Surcharge.

¹⁶ According to its own website, VFS (Visa Facilitation Services) Global is the world's largest outsourcing and technology services specialist for governments and diplomatic missions worldwide, with 3,093 application centres and operations in 147 countries across five continents, serving the interests of 62 client governments. Since 2001, VFS Global has processed over 203 million applications, and since 2007 over 84 million biometric enrolments.

¹⁷ Due to restrictions on commercial companies operating in Sudan, the Khartoum VAC is located within the British Embassy and operated by FCO staff. At the factual accuracy stage, the Home Office noted that: "in the US, Assisted Service Centres, run by the Department of Homeland Security, enrol biometrics on behalf of UKVI..."

¹⁸ Document Scanning Assistance is a premium service provided by VACs. However, for Windrush and Family Reunion applicants assisted scanning is free.

- 5.15** The last stage of the process is for the VAC to return the applicant's passport, with the visa inside where one has been granted. Applicants can collect their passport from the VAC, or in some cases can opt to have it delivered to them for an additional charge.

'Onshoring'

- 5.16** Since online applications can be processed anywhere, and since the Home Office's operating costs are lower in the UK, as DMCs closed more of the work has been "onshored" to the UK. Initially, the work of a DMC was transferred en bloc to either Croydon or Sheffield.

Network consolidation

Phase 1

- 5.17** As the developing technology facilitated more flexible and dynamic routing of workstreams, the idea of 'thematic' (route-based rather than geography-based) working began to evolve. UKVI embarked on a Network Consolidation Programme, Phase 1 of which began in 2015 when it was determined to move all 'net migration' decision making to the UK.
- 5.18** To simplify the routing of the workstreams, UKVI decided to create thematic hubs, the first of which was in Sheffield, which would process all Points Based System (PBS) Tier 4 (Student) applications, whether the application was made from overseas or from within the UK.
- 5.19** At the time of the inspection, Sheffield was about to become a Work & Family hub, dealing with PBS Worker applications (Tiers 1, 2 and 5) and Settlement applications (Spouse and Family members). Meanwhile, in January 2019, Croydon became a hub for all Visitor Visa applications. European Applications (EEA Family permits, etc.) were dealt with in Liverpool.

Phase 2

- 5.20** A Network Consolidation Programme Phase 2 'Options Paper', produced for UKVI senior management in October 2018,¹⁹ noted that during 2018-19 26 per cent of applications made globally were processed in the UK. Having largely completed the move of the net migration work, UKVI began Phase 2 of the Programme which involved a further reduction in the number of overseas DMCs and more work moving to one of the thematic UK hubs.
- 5.21** UKVI used a 'weightings matrix' that considered the political, environmental, economic, and technical factors relevant to each DMC to help to determine which would close. In November 2018, the decision was taken by the Network Consolidation Board to retain Abu Dhabi, Amman, Beijing, Istanbul, New Delhi and Pretoria and, by 2020-21, to close Bogota, Chennai, Manila, Riyadh, and Warsaw.

Problems at the Sheffield DMC – Spring/Summer 2017

- 5.22** In late 2015, when UKVI began moving the net migration routes²⁰ to the UK, its intention was to increase processing capacity at the Sheffield DMC to manage the additional work. This was to be supported by a new digital scanning solution provided by the VACs, removing the need for paper forms and physical copies of supporting evidence.

¹⁹ An internal Home Office document, produced by the UKVI Deputy Director of Consolidation, Projects and Planning.

²⁰ Net migration routes are family migration, long-term work (PBS Tiers 1, 2 and 5) and long-term study (PBS Tier 4)

- 5.23** By March 2017, the first tranches of net migration routes from China and India had been moved to the Sheffield DMC. In April 2017, there were signs of operational pressures in the Sheffield DMC, which UKVI told inspectors were caused by delays in the recruitment of decision makers and a seasonal increase in demand. As a result, the Work in Progress (WIP) queue grew and processing times lengthened.
- 5.24** In order to solve the DMC's WIP and processing times problems, UKVI turned to overseas decision makers for help. Some travelled to the Sheffield DMC to work there for a week at a time, while others remained overseas and dealt with applications that had been redirected to them from Sheffield.
- 5.25** By the end of July 2017, processing times at the Sheffield DMC had continued to increase and a significant number of decisions were failing to meet the customer service standards, which prompted an increase in complaints and correspondence. UKVI therefore made the decision to re-route some workstreams that had been onshored back to China and India temporarily.

Peer review

- 5.26** In July 2017, the Independent Chief Inspector (ICI) raised the 'severe problems' at the Sheffield DMC with the Director General UKVI to determine whether it was necessary to carry out an urgent inspection. DG UKVI told the ICI that he had commissioned an internal peer review to be led by the Chief Operating Officer of Her Majesty's Passport Office (HMPO), supported by a team headed up by HMPO's Director of Central Services.
- 5.27** The review took place during September and October 2017 and involved an examination of relevant documents, workshops and interviews with the relevant Senior Management Team, Regional Directors, HR and staff in the Sheffield DMC.
- 5.28** The 'primary purpose' of the review was:
- “to capture lessons learned to ensure robust operational plans are developed and put into practice to support successful delivery of operational objectives during 2018 peak. The purpose of the review is not to apportion blame or unduly highlight short comings.
- Whilst the objective of the review is forward looking, in order to make recommendations to mitigate recurrence it was accepted that the review team would need to consider those factors which contributed to the issue and the actions taken to recover from the service failures over the summer of 2017.”
- 5.29** Its scope covered:
- contributing factors
 - management response
 - recommendations and lessons learned
- 5.30** The review team's report was sent to DG UKVI on 20 November 2017. It made a number of findings and recommendations in relation to:
- operational and contingency planning
 - workforce planning and resourcing
 - structure governance

- culture, people and leadership
- strategic direction
- project planning
- service readiness and change controls
- operational reporting
- initial management response
- prioritisation of applications
- decision quality
- digital workflow
- customer experience and decision making
- managing stakeholders and reputational impact
- customer contact

5.31 There were 43 recommendations in total. These were rated either 'Critical – action immediately' (14); 'Urgent – action within 3 months' (15); or 'Important – action within 12 months' (14). All 43 recommendations were 'Accepted' and UKVI (Visas & Citizenship Directorate) produced an Action Plan with each recommendation allocated an owner.

5.32 As at 31 January 2019, 33 of the 43 recommendations were shown as 'Complete'. Nine were 'Complete/Ongoing' (indicating that some part of the recommendation had not yet been implemented). One was 'Ongoing and action required'.

6. Inspection findings – Strategic direction and governance

Strategic direction

6.1 On 10 May 2013, the Home Secretary wrote to the Foreign Secretary, explaining that:

“We are committed to the FCO’s One Government Overseas agenda and, where we operate, want our teams to be an integrated part of the whole. We are conscious that this requires further harmonisation and rationalisation of support services, platforms and policies. In order to contribute fully to that process, and in view of our Spending Review obligations, we must also continue to meet the commitments my Department made to reduce our footprint and headcount on the FCO platform. Indeed our current Memorandum of Understanding is based on these commitments. This cannot be seen in isolation from the number of people we can have overseas to deliver the service. We must also be prepared to offer further savings if and when required as part of the forthcoming spending round.

Delivering service improvements at the same time as making savings is challenging, but I believe it is possible to strike this balance if we are prepared to continue to think creatively about our visa services. The current reprocurement of the global commercial partner contract for biometric enrolment provides an opportunity to move towards a model which enables us to retain our geographical coverage in lower volume and least cost efficient locations using “mobile” biometric collection, and to generate a greater degree of cost recovery from the applicant by converting more application points into “user pay” centres. This model will complement our ongoing programme to consolidate visa decision-making hubs in view of the benefits of enhanced decision quality and reduced cost. We will aim to reduce the number further as technology, the availability of accommodation and assurance on quality and risk allows. We recognise that responsiveness to applications submitted by individuals of high political status or economic value is of key importance to the foreign policy interests, and so my officials are putting together proposals to increase flexibility here, including around visa waivers.”

6.2 While this message did not contain any details of planned post closures, it was a clear articulation of the Home Office’s strategic thinking. Inspectors did not see the response from the Foreign Secretary, nor any further ministerial correspondence on this matter.

6.3 At the point at which this letter was sent, the Home Office had already closed 59 Decision Making Centres (DMCs) since January 2008. Between May 2013 and the end of 2018, it closed a further 42.

- 6.4** During 2015, UKVI senior management provided the Home Secretary, Immigration Minister and Home Office Board members with updates on proposed changes to the visa network, including a recommended 12-18 month programme to “repatriate and consolidate with in-country operations, decision-making on visa cases that would contribute to net migration: Family Migration, Long-Term Work (PBS Tiers 1, 2 & 5) and Long-Term Study (PBS Tier 4).” Ministerial agreement was sought “over the next 18 months” to:
- continue to consolidate work overseas into bigger DMCs, most notably downscaling operations in Kuwait (in line with EVW²¹) and moving Shanghai work to Beijing
 - move sponsor-based casework (settlement, work and study but not visits) to the UK by mid-2017, on a phased basis, starting with China and India
 - complete the previously agreed move of Paris casework to the UK
 - move the remaining casework from Nigeria to the UK by end of 2016
- 6.5** These recommendations were made against the backdrop of the ‘Spending Review and Autumn Statement 2015’, which required the Home Office to make “resource savings of 5% by 2019-20 through a fully self-funded borders and immigration system and total reductions of 30% in the department’s administration budget compared to 2015-16.”²²

Governance

Pre-2017

- 6.6** UKVI senior management told inspectors that until 2017 there was no effective oversight of the network consolidation process beyond that provided as part of everyday line management.
- 6.7** For this inspection, inspectors asked for copies of “Any documents, including minutes of meetings, business cases, impact assessments, detailing the strategic aims and expected benefits of network consolidation.” Only one of the documents provided was dated prior to 2017.
- 6.8** This single three-page document, created following a UKVI Senior Management Team meeting in August 2016, was headed ‘UKVI International: Consolidation Programme’. It was divided into four sections:
- ‘Objective’, which was “All non-visit casework to be rerouted to the UK from every decision making centre by the end of 2017, as well as all case work from Paris, Abuja, and Lagos DMCs”
 - ‘Draft principles & criteria’, which included rerouting work only when Sheffield had sufficient capacity, prioritising expensive to maintain locations for closure, measuring the impact of consolidation (on decision quality, performance, financial savings) “as far as practical”, and “Executive Board sign-off and oversight”
 - ‘Key risks to track’, which included a reduction in decision quality through the loss of local knowledge (mitigated by retaining a RALON²³ presence), a reduction in [performance against] Customer Service Standards, costs versus savings, staffing and productivity levels in Sheffield, and inaccurate forecasting of demand

²¹ Electronic Visa Waiver: <https://www.electronic-visa-waiver.service.gov.uk/apply/begin>

²² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/479749/52229_Blue_Book_PU1865_Web_Accessible.pdf

²³ Since renamed Immigration Enforcement International (IEI).

- ‘Sequencing’, which it was explained may be by DMC, country, VAC, category of casework or “some combination” of these

6.9 While it lacked any details of who had attended the meeting or of specific actions with owners and timescales, the document showed that UKVI management had understood the issues and risks associated with network consolidation and recognised the need to plan, model, measure and have oversight and sign-off for onshoring. However, the problems encountered by Sheffield in Spring/Summer 2017 suggested that this was not put into practice.

2017 peer review

6.10 In November 2017, the review of the unsuccessful onshoring of a tranche of work from India and China to the Sheffield DMC reported on the factors that had contributed to the service failures that occurred over the summer of 2017. The report included a section on ‘Structure and Governance’. This stated:

“There have been a number of changes to V&C’s²⁴ organisational structure, particularly at SCS level, with responsibilities for management of operational delivery teams moving between SCS PB1s.²⁵ While these changes were embedding there was confusion at [Regional Director] RD level²⁶ and a lack of understanding of key responsibilities and accountabilities.

- The meeting structures and general governance, a legacy of the international operation, were not updated to reflect the in-country work and did not fully support the onshoring process in terms of timing, level of detail or decision-making. In particular:
 - The quarterly strategic boards did not facilitate substantive discussions or enable scrutiny at the right level of detail. While these are popular, as they allow the geographically dispersed team to come together face to face, papers were often circulated late (when RDs were in transit) resulting in limited time to prepare adequately for substantive discussions.
 - The monthly executive board call lacked structure and discipline. Actions were not routinely followed up.
 - The weekly call was more of a round robin update from the respective regions and an opportunity for regions to bid for extra resource. Decisions were generally deferred from the call for follow up bilateral discussions without arbitration or objective decision making on priorities. There was an absence of a formal challenge process holding delivery teams to account and objectively assessing performance against expectation.”

²⁴ Visas & Citizenship Directorate, part of UKVI.

²⁵ Senior Civil Servant Pay Band 1 (Grade 5).

²⁶ Regional Directors are Grade 6.

6.11 These findings resulted in two ‘urgent – action within 3 months’ recommendations (9 and 10 in the review):

- V&C to conduct a review of governance and meeting structures (at all levels) and workshop opportunities for improvement. This should include the establishment of a consistent rhythm for communications and decision-making, appropriate fora for discussing and challenging performance and supported by appropriate data
- V&C to define a Terms of Reference for each meeting, which should include:
 - purpose of the meeting
 - agenda and timings
 - attendees and rules of participation/delegation
 - secretariat arrangements
 - refresh/review timescales.

Establishment of the Consolidation Board

6.12 In November 2017, UKVI (V&C) established the Consolidation Board. The first meeting was on 19 December 2017. This agreed the Board’s Terms of Reference:

- to decide the focus for consolidation in the medium term, tasking the project team to work with the regions and bring forward routing proposals to future boards. This includes consolidation across all workstreams and on the principle that when non-net migration work is moved out of a DMC the first consideration is whether that work can be routed to the UK
- to agree specific routing proposals to forward to the Executive/Strategy Board/SRO for sign-off
- to review and address consolidation risks and issues
- to agree business contingency plans

6.13 The Board also noted that:

“Each routing proposal will be based on an evidence based service readiness assessment with defined criteria”

“Proposals will be supported by a Project Update Document; an assurance assessment covering the full range of relevant subject areas – policy, procedures, training, resources, IT change, communications; and milestones – which will be held by the Project team.”

6.14 In November 2018, the Home Office provided inspectors with notes and PowerPoint presentations from eight meetings of the Consolidation Board held between 19 December 2017 and 20 November 2018. These clearly show the issues under consideration, list the decisions taken, actions agreed and expected completion dates. Based on this evidence, the governance structure recommended by the peer review team had been established and was functioning as business as usual.

6.15 UKVI (V&C) later provided inspectors with a list of Consolidation Board members as at February 2019 – see Figure 3. However, the notes of the Board meetings did not record who had attended each meeting.

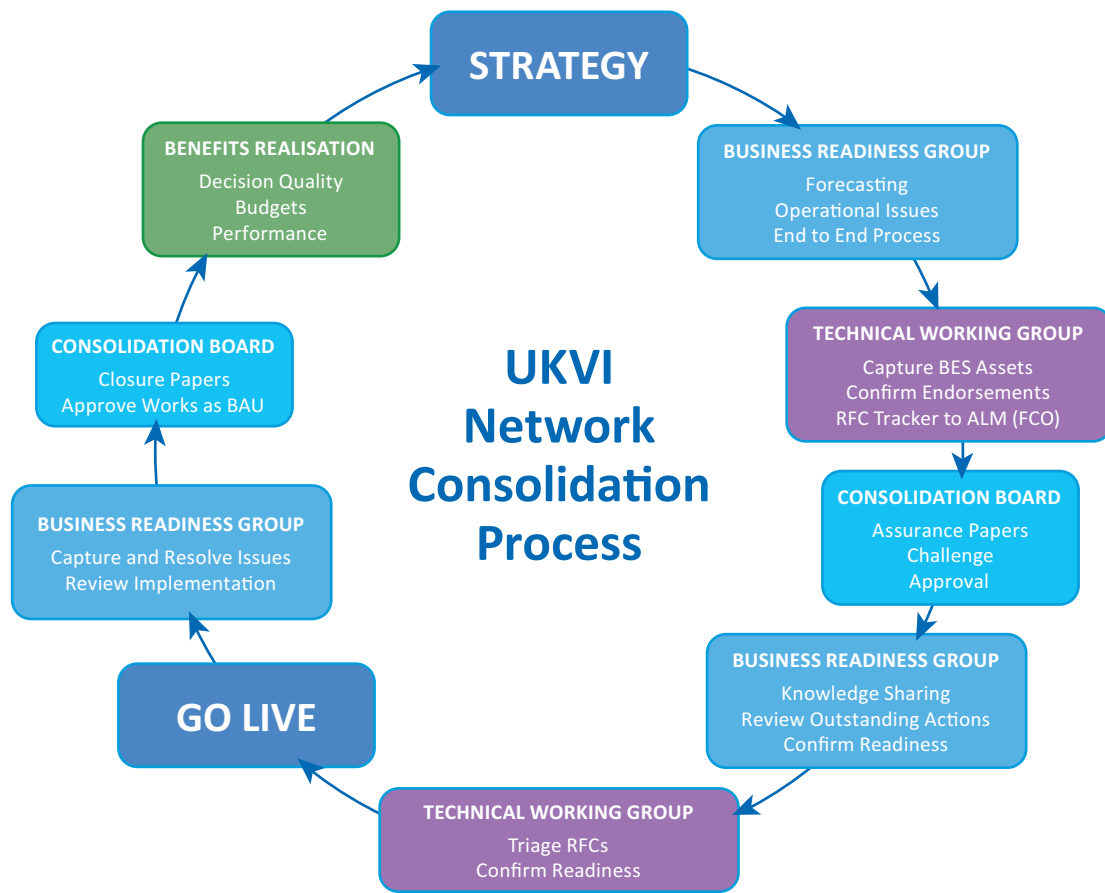
Figure 3 Consolidation Board membership – February 2019

Position/Grade	Board role	Location
V&C 'Visits and Family', SCS	SRO, Chair	Sheffield
Head of Family and Marriage team, G6	Board member	Sheffield
Head of Visits, UK, G6	Board member	Croydon
Head of Performance, G6	Board member	Sheffield
Central Operations Team, G6	Board member	Croydon
Head of Director's Office, G6	Board member	London
Regional Director, G6	Regional representative	Asia Pacific and China, based in Beijing
Regional Director, G6	Regional representative	South and South East Asia, based in New Delhi
Regional Director, G6	Regional representative	Middle East, North Africa, Central Asia, Pakistan and Turkey, based in Abu Dhabi
Regional Director Americas, Head of PBS Thematic Team, G6	Regional representative	Sheffield
Regional Manager, G7	Regional representative	Africa
Immigration Intelligence, G7	II representative	Sheffield
Strategy & Transformation, SCS	STP representative	London
Consolidation & Planning, G7	Board documents, minutes	Sheffield

UKVI Network Consolidation Process

6.16 Figure 4 shows UKVI's Network Consolidation Process. Along with the Consolidation Board, it shows two sub-groups, a Business Readiness Group and a Technical Working Group, and lists the principal functions of each.

Figure 4



Upward reporting from the Consolidation Board

- 6.17** Inspectors asked about any reporting from the Consolidation Board to other Home Office Boards and to ministers. They were told that the Consolidation Project Team reported to the Consolidation Board and to the monthly UKVI Transformation Board, which is managed by Strategy, Transformation and Performance.²⁷
- 6.18** The UKVI Transformation Board receives monthly Project Progress Reports (PPR) from across UKVI. The list of PPRs from January 2019 was shared with inspectors. ‘Net Migration Consolidation’ is Project T168, the Project Description for which is “To onshore all net migration (work, study, settlement) work to the UK by the end of 2018/19 financial year (Mar 2019).” The PPR notes that “[The] Priority remains to be able to meet customer service standards.”
- 6.19** The January 2019 PPR for T168 provided RAG (Red, Amber, Green) ratings for:
- Stakeholders (Amber)
 - Scope (Green)
 - Cost (Green)
 - Resources (Green)
 - Schedule (Green)
 - Benefits (Green)

²⁷ Strategy, Transformation and Performance, part of UKVI, is responsible for setting the strategic direction for UKVI overall, defining the set of changes that are required and working with and supporting the operational business to delivering them.

- Dependencies (Amber)
- Risks (Green)

- 6.20** The RAG rating for ‘Overall Delivery Confidence’ for the Programme was rated Amber/Green, meaning “Successful delivery appears probable. However, constant attention will be needed to ensure risks do not materialise into major issues threatening delivery”.
- 6.21** The prescribed format of the PPRs ensures that those responsible for delivering each project are asked the right questions about progress against the project plan, risks, issues, assumptions and mitigations. For the most part, the January 2019 PPR for T168 had been completed thoroughly. It included a list of expected ‘Benefits’, all of which were shown as ‘On track’. One of the latter benefits was “Reduced FCO charges from smaller footprint”. However, the fields relating to Programme costs or savings were left blank.

Post-closure ‘Go live’, review and evaluation

- 6.22** Inspectors were provided with evidence that the Consolidation Board was closely monitoring each stage of the onshoring process. The Board had to authorise ‘Go live’ for each DMC or workstream that was to be onshored, based on a ‘Consolidation Assurance Go Live Pack’ which provided RAG ratings for:
- Design
 - IT Deployment Readiness
 - Impact Assessment & Change Landscape
 - Business Operations Planning
 - Customer Services
 - Benefits
 - Business Continuity and Disaster Recovery
 - Estates
 - Training
 - HR
 - Business Intelligence
 - Commercial
 - Planning & Reporting
- 6.23** The Board had co-opted a Grade 6 specifically to produce forecasts of demand and V&C capacity, so that it could be assured that the resources were in place to manage proposed reroutings. The detailed forecasts took account, for example, of local productivity rates, staff sickness (short-term, long-term and seasonal), and training commitments.
- 6.24** The Consolidation Board also signed off on the closure of each onshoring exercise, formally accepting that it had become business as usual. This was based on the Board’s review of an ‘Assurance Closure Pack’, which covered:
- Outstanding Issues, Incidents or Defects
 - Solution
 - Service Management

- Operational & Public Protection and Fraud Processes, Policies and Procedures
- Security Architecture
- Business Intelligence (formally Management Information)
- Commercial
- Finance
- Post-Project Review
- Benefits
- Operational Project Sponsor/Senior User
- Other Activity for Closure

6.25 Inspectors were told that following the closure or downsizing of an overseas DMC and of each routing of work to the UK:

“issues are collated and after approximately one month an assurance meeting is carried out. A report is then provided to the next Consolidation Board. If all issues have been resolved or mitigated the recommendation is that this element of the consolidation project is closed off. A closure decision can be deferred to a later board. Operational performance will continue to be monitored as business as usual.”

Benefits Realisation

6.26 Inspectors asked about the Benefits Realisation stage of the Network Consolidation Process and for any documents relating to this for each DMC closed since 2015. The Home Office responded:

“We track business performance through monitoring our performance against published service standards, and through spend against budgets.”

6.27 It provided various documents to evidence this, including:

- Customer Service Standard performance data
- Work in Progress (WIP) by application age
- Weekly Performance dashboards
- Exit Check Report (showing compliance of certain routes)
- Foreign and Commonwealth Office (FCO) costings (for provision of accommodation and services to V&C)

6.28 These documents offered some insights into two of the elements identified in the Network Consolidation Process map: ‘Budgets’ and ‘Performance’. However, none appeared to speak directly to the third element: ‘Decision Quality’.

FCO ‘Platform Charge’ and the savings argument for consolidation

6.29 The Home Office provided headline figures for the FCO Platform Charge (the cost to the Home Office of FCO-supplied accommodation and services) for the period 2014-15 to 2019-20. UKVI (V&C) senior managers explained that disaggregating these costs for individual locations and services was difficult due to the complex calculations the FCO used for its charges.

Figure 5 FCO Platform Charge 2014-15 to 2019-20

Financial year	FCO Platform Charge (£m)
2014-15	63.8
2015-16	77.0
2016-17	45.8
2017-18	44.8
2018-19	45.5
2019-20	39.2

6.30 Inspectors question the lack of any obvious correlation between the headline figures and the pattern or scale of DMC closures. The Home Office commented:

“The reduction is not through the lowering of platform or marginal costs but through fewer UKVI staff in a smaller number of posts although amended overall charges do not necessarily immediately apply. As overall entry clearance application numbers have risen from 2.8 million in 2015 to 3.3 million in 2018 the saving from bringing work and staff back to the UK is in fact greater than the figures above show.”

6.31 It explained the effect of the lack of clarity in the FCO’s costings on its business planning:

“The business cases that we have developed for hub and spoke/consolidation over the years have been made more complicated by the absence of consistent and meaningful platform costs from FCO. Our view is that the difference in costs between running a UK operation and posting staff overseas is so significant, even allowing for inaccuracy, and the benefits sufficiently clear after so many years that we do not view a lack of specific individual business cases in some circumstances as a critical gap in our planning or thinking.”

6.32 In reality, the Home Office’s own costings, of additional staff in the UK and their on-costs, are equally opaque, and any attempt at a like-for-like comparison would be further complicated by the different productivity levels (and therefore unit costs) in the UK and at each DMC, and the fact that application volumes are not constant. Nonetheless, the absence of individual business cases makes it harder for the Home Office to articulate why onshoring is the right option both in particular instances and as an overall strategy.

7. Inspection findings – Performance and assurance

Performance

“A world-leading immigration service”

7.1 UKVI’s Business Plan 2017-20 set out its vision to be “a world-leading immigration service, working for a safe and prosperous United Kingdom”.²⁸ Delivery of this vision relied on four ‘Missions’:

- Control migration
- Deliver world-class customer service
- Safeguard the vulnerable and their host communities
- Make UKVI a great place to work

Visas and Citizenship directorate

7.2 At the time of this inspection, UKVI comprised four directorates: Immigration and Protection; Resettlement, Asylum Support and Integration; Strategy, Transformation and Performance; and Visas and Citizenship. The Visas and Citizenship (V&C) directorate was created in January 2017. In 2018, European Casework and the EU Settlement Scheme were added to V&C’s remit, along with the Windrush Compensation Scheme. According to the Home Office intranet, as at 31 August 2018, V&C comprised 4,595 staff, making it the biggest of the four directorates.

Application volumes

7.3 Transparency data published by the Home Office shows visa applications to have increased each year since 2015. Figure 6 shows the number of applications, along with the number ‘Resolved’²⁹ and the Grant/Refusal numbers and rates.

²⁸ Taken from UKVI’s Business Plan 2017-2020, an internal Home Office document.

²⁹ The applications Resolved in any year will include some that were submitted before the end of the previous year, so this figure, along with the Grants, Refusals, Withdrew and Lapsed figures do not match the Applications figure exactly. In Figure 6, the Resolved totals are the sum of the Granted, Refused, Withdrew and Lapsed totals, except for 2016. 2,883,431 is the figure shown in the published transparency data. The numbers Granted, Refused, Withdrew and Lapsed total 2,883,395.

Figure 6: Number of visa applications received by UKVI 2015 to 2018

Year	Applications	Resolved	Granted	Refused	Withdraw	Lapsed
2015	2,840,390	2,849,880	2,468,347 (86.61%)	372,237 (13.06%)	7,803	1,493
2016	2,896,157	2,883,431	2,478,973 (85.97%)	397,567 (13.79%)	6,516	375
2017	3,061,106	3,051,304	2,707,867 (88.74%)	334,033 (10.95%)	9,310	94
2018	3,291,370	3,294,066	2,905,391 (88.20%)	380,081 (11.54%)	8,508	86

7.4 According to V&C senior management:

“In 2018, approximately 18% of all overseas applications were routed to the UK. This will rise, by the end of March 2019 when Consolidation – Part 1 ends, to approximately 26%, and again by 2020/21 to approximately 44%.”

7.5 The number of applications yet to be resolved fluctuates. Figure 7 shows the total, referred to by UKVI as the Work in Progress (WIP), for out of country applications as at 2 January 2019, broken down by visa type (Settlement and non-Settlement).

Figure 7: Out of country visa applications WIP, broken down by case type, as at 2 January 2019

Period	Settlement applications	Non-Settlement applications	Total
2018 Q4	11,973	53,337	65,310

Customer Service Standards

7.6 UKVI’s Customer Service Standards (CSS) serve as a key performance measure. The CSS are published on [GOV.UK](https://www.gov.uk), which states that for “customers applying for a visa from outside the UK” the processing time where an application is ‘straightforward’, meaning a decision can be made without asking the applicant for further information, is:

“90% of non-settlement applications within 3 weeks, 98% within 6 weeks and 100% within 12 weeks of the application date (where 1 week is 5 working days).”

7.7 For “customers applying for settlement from outside the UK”, the CSS for straightforward applications is:

“98.5% of settlement applications within 12 weeks of the application date and 100% within 24 weeks of the application date (where 1 week is 5 working days).”

7.8 The CSS do not apply to applications UKVI deems to be non-straightforward (sometimes referred to as ‘complex’), although some of these are resolved within the CSS.

7.9 Figures 8 and 9 show UKVI’s record of its ‘Global’ quarterly performance against the 60-day out of country settlement CSS and 15-day non-settlement CSS from 2015 Q1 (January – March) to 2018 Q4 (October – December).³⁰

Figure 8: Quarterly performance against the Customer Service Standards (CSS) for straightforward and non-straightforward out of country Settlement visa applications

Period	Straightforward			Non-straightforward		
	Resolved	Resolved within CSS	% Resolved within CSS	Resolved	Resolved within CSS	% Resolved within CSS
2015 Q1	12,687	12,575	99%	1,578	1,069	68%
2015 Q2	13,260	13,096	99%	2,544	1,480	58%
2015 Q3	13,539	13,511	100%	2,421	1,714	71%
2015 Q4	15,462	15,388	100%	2,018	881	44%
2016 Q1	13,172	13,128	100%	1,358	665	49%
2016 Q2	13,662	13,226	97%	1,617	642	40%
2016 Q3	12,747	12,672	99%	1,574	698	44%
2016 Q4	12,410	12,352	100%	1,687	724	43%
2017 Q1	11,064	10,880	98%	3,047	749	25%
2017 Q2	10,898	8,977	82%	3,995	907	23%
2017 Q3	11,382	10,821	95%	2,078	891	43%
2017 Q4	11,378	11,159	98%	2,829	1,178	42%
2018 Q1	11,368	11,218	99%	2,810	1,193	42%
2018 Q2	12,136	11,781	97%	3,160	1,058	33%
2018 Q3	11,969	11,872	99%	2,569	1,040	40%
2018 Q4	13,330	13,174	99%	2,256	910	40%

³⁰ At the factual accuracy stage, the Home Office commented that the data in Figures 8 and 9 “in terms of total volumes do not fully align with transparency publication at that point in time. This is likely to be due to timeliness and the data for historic records being subject to post decision activity which inevitably moves historic numbers around slightly.”

Figure 9: Quarterly performance against the Customer Service Standards (CSS) for straightforward and non-straightforward out of country non Settlement visa applications

Period	Straightforward			Non-straightforward		
	Resolved	Resolved within CSS	% Resolved within CSS	Resolved	Resolved within CSS	% Resolved within CSS
2015 Q1	523,433	519,699	99%	7,193	5,839	81%
2015 Q2	884,546	881,863	100%	28,457	22,597	79%
2015 Q3	811,182	809,619	100%	31,440	25,146	80%
2015 Q4	476,657	475,790	100%	13,273	10,432	79%
2016 Q1	512,859	512,480	100%	10,453	8,066	77%
2016 Q2	933,408	932,342	100%	15,998	11,543	72%
2016 Q3	812,160	808,893	100%	17,204	11,145	65%
2016 Q4	520,045	517,391	99%	12,657	8,068	64%
2017 Q1	592,590	591,626	100%	13,904	8,504	61%
2017 Q2	988,049	980,570	99%	32,489	17,800	55%
2017 Q3	757,870	695,414	92%	25,545	13,585	53%
2017 Q4	531,023	524,665	99%	15,820	10,272	65%
2018 Q1	587,314	583,943	99%	17,934	11,914	66%
2018 Q2	1,043,238	1,030,443	99%	41,899	25,031	60%
2018 Q3	883,597	874,457	99%	35,766	25,134	70%
2018 Q4	598,715	591,130	99%	21,384	13,746	64%

- 7.10** Figures 8 and 9 show that the lowest points for performance against both were in 2017, in either Q2 or Q3, when the problems with onshoring to Sheffield were peaking. Performance in Sheffield in 2017 Q2 and/or Q3 was well below these Global averages.
- 7.11** In 2017 Q2, Sheffield resolved 76 per cent (5,580 out of 7,308) of straightforward settlement applications within the CSS. Sheffield accounted for two-thirds of the global total of resolved applications. Of the remaining third (3,590), 95 per cent (3,397) were resolved within the CSS.
- 7.12** For non-straightforward settlement applications the picture was worse. Sheffield resolved 13 per cent (419 out of 3,199) within the CSS, compared with 61 per cent for the rest of the network. The non-straightforward global total for 2017 Q2 was by a considerable margin the highest recorded between 2015 and 2018 and Sheffield accounted for 80 per cent of it, raising the suspicion that more applications were being ‘complexed’ (and thereby set outside the CSS) because Sheffield was under pressure.³¹

³¹ At the factual accuracy stage, the Home Office pointed to the findings of the HMPO review, which stated: “It was suggested by some that Sheffield had incorrectly classified a significant number of applications as ‘complex’ in order to remove them as potential customer service standard fails. This was strongly rebutted by both the SMT and Sheffield and the review team has seen no evidence in the data presented that suggests otherwise. There are a number of cases (circa 1k) that were classed as complex due to a Supreme Court judgement.”

- 7.13** In the following quarter, 2017 Q3, Sheffield resolved 82 per cent (88,606 out of 108,439) of straightforward non-settlement applications within the CSS. The applications resolved in Sheffield accounted for 14 per cent of the global total of 757,870. The rest of the network resolved 93 per cent (606,808 out of 649,431) of applications within the CSS. However, either side of this quarter, Sheffield's performance was much stronger, with 95 per cent (113,886) of applications resolved within the CSS in 2017 Q2 and 97 per cent (52,745) in 2017 Q4.
- 7.14** For non-straightforward non-settlement applications, 2017 Q2 and Q3 stand out, both because of the low performance against the CSS, 25 per cent and 22 per cent respectively, and because of the numbers (10,914 and 8,976) and proportions (c. eight per cent) of applications deemed complex, more than in any other quarters between 2015 and 2018.
- 7.15** The data provided by the Home Office shows significant year-on-year increases in the numbers of straightforward non-settlement applications (the biggest category) resolved annually in Sheffield and in Croydon since 2015. In Sheffield these had gone from 74,599 in 2015 to 352,694 in 2018, while in Croydon they had gone from 102,092 in 2015 to 348,105 in 2018. By 2018, Sheffield and Croydon combined accounted for 22.8 per cent of the 3.2 million non-settlement applications (straightforward and non-straightforward) resolved by UKVI.
- 7.16** Over the four years from 2015 to 2018, Manila (one of the five Decision Making Centres (DMCs) scheduled for closure in Phase 2 of the Network Consolidation Programme) actually processed more straightforward non-settlement applications in total (1,042,861, with 99 per cent resolved within the CSS) than either Sheffield (909,059) or Croydon (828,988). However, by 2018 Sheffield and Croydon had both overtaken Manila's annual total (283,601 in 2018).

Commercial partner performance

- 7.17** UKVI's Supplier Relationships and Service team told inspectors that a performance management framework was in place for the two commercial partners who manage the network of Visa Application Centres (VACs). This involved a monthly cycle of management information (MI) gathering and reporting against the service levels specified in the contracts, covering volumes, timescales and quality. The Supplier Relationships and Services team manages this in partnership with UKVI's Operations teams and Home Office Commercial and Finance.
- 7.18** The commercial partners produce monthly performance reports for each VAC. The data is assured by UKVI on a regional basis and presented in the form of a Balanced Scorecard (VFS) or Heat Map (TLS), which forms the basis for the management discussion. The Home Office provided inspectors with examples of the Balanced Scorecard and Heat Map. While the recorded data was largely unintelligible without a close understanding of the contracts, the Balanced Scorecard and Heat Map appeared to cover the range of information necessary for UKVI to be able to manage contract compliance effectively and to apply service credits where appropriate.

Assurance

Visas and Citizenship ‘Operating Mandate’

7.19 V&C’s Operating Mandate sets out the mandatory identity and suitability checks that must be completed when considering an application for entry clearance or for leave to remain in the UK. The Operating Mandate, which is available to staff on the Home Office intranet, was last updated on 27 April 2018. It was not intended to replace existing operational guidance or to restrict decision makers from carrying out additional checks based on their own judgement and assessment of risk.

Streaming

7.20 Since 2015, V&C has been using a Streaming Tool to assess the risks and levels of potential immigration harm attached to each visa application.

7.21 The Streaming Tool is an Access database that allocates a score to various factors, including the nationality of the applicant, all immigration harm data collected globally by Immigration Enforcement over the preceding 12 months³² and attributable to particular cohorts of applicants, attributes from local risk profiles (for example, the applicant’s occupation, sponsor), and any other relevant information (such as age, reason for travel, travel history). The scores produce an overall RAG rating for the application:

RED	High risk
AMBER	Medium risk
GREEN	Low risk

7.22 Since early 2018, all applications have been run through ‘Version 3’ of the Streaming Tool. V&C told inspectors that “Streaming methodology was standardised in January 2018”. Internal guidance, produced in October 2017, described in detail how streaming should work. The explanation is written for trained practitioners and refers to monthly Operational Review Meetings at all DMCs, an Enrichment Framework,³³ and standard ‘building blocks’. The latter were listed as: “Issue Rates,³⁴ Previous Refusals, Post-enrichment streaming, 320 (or equivalent) refusals,³⁵ ECM approval/review, ‘Binary’ work stream,³⁶ Global productivity expectations”.

7.23 The Streaming Tool is constantly reviewed and adjusted in the light of experience.³⁷ V&C told inspectors:

“Decision makers are invited to consult on the development of, and feedback on, the effectiveness of profiles, they are best placed to do so and will be the first to spot whether something isn’t quite right.”

32 Immigration Enforcement provides a quarterly Global Visa Risk Scoring (GVRS) product to UKVI.

33 The guidance describes enrichment as “verification of information on the Visa Application Form” and describes a range of checks, including Home Office databases, open sources, public records and interviews, and the circumstances in which they are either mandatory or may be appropriate.

34 The rubric accompanying “issue rates” states: “Expectations for each stream should NOT be set, as [it] may lead to unconscious bias. However, locally agreed tolerance levels for each work stream may be set, to identify and [sic] emerging risks for review at the ORM.”

35 Immigration Rules part 9: grounds for refusal. General grounds for the refusal of entry clearance, leave to enter or variation of leave to enter or remain in the United Kingdom (paragraphs A320 to 324).

36 This refers to visa routes which require minimal problem-solving skills or judgement and require only an objective assessment that the valid specified evidence has been provided and there has been no material change since any previous decision to issue a visa. As such, they may be considered by an AO decision maker.

37 At the factual accuracy stage, the Home Office commented that: “The streaming tool is also updated quarterly to reflect the most up to date GVRS data provided by Immigration Enforcement to UKVI.”

7.24 As to how it is used, V&C explained:

“the streaming outcome offers an indicative risk rating, it doesn’t mean that applications should be issued or refused. Decisions makers [sic] apply a credibility assessment and/or validate evidence provided. Not all GREENs will be issued and not all REDs will be refused.”

7.25 Following up the interest shown in Visitor Visa decisions for African applicants by the All Party Parliamentary Group (APPG) for Africa, in August 2019 the Independent Chief Inspector (ICI) visited Croydon for a walkthrough of the decision-making process. This included observing the streaming of applications, their processing by an Entry Clearance Officer (ECO) and their review by an Entry Clearance Manager (ECM).

7.26 The ICI was told that for African Visitor Visas the current issue rates were 99.5 per cent for applications streamed GREEN and 55 per cent for applications streamed RED. This supported the statement that not all REDs are refused, and the ICI observed an ECO grant two linked applications that had been streamed RED, having satisfied himself that the evidence provided (of purpose of visit, employment, income) was sufficient.³⁸

7.27 During the course of this inspection, inspectors were told that, following initial training, new decision makers in Croydon were mentored by an experienced decision maker and their work was subject to 100 per cent checking until they were assessed as fully competent. They all started on GREEN-streamed applications and were slowly introduced to AMBERs and REDs. Meanwhile, in Sheffield, GREEN and AMBER Tier 4 and Points Based System (PBS) applications were allocated to Administrative Officer decision makers (AODMs), while Executive Officer decision makers were allocated the RED cases.

7.28 Inspectors were provided with examples of streaming profiles along with supporting streaming decision logs, operational instructions, internal guidance and Standard Operating Procedures (SOPs). Inspectors also observed the Streaming Tool in operation and spoke to staff who used it. In general, staff in Croydon and Sheffield were more positive about streaming than staff in Manila and Warsaw. Inspectors were told that the Streaming Tool had improved, however in each location there were some concerns about an overreliance on the Tool and a de-skilling (‘dumbing down’) of decision makers when it came to assessing risks, exacerbated by a high turnover of staff.

Quality Assurance

7.29 Within each DMC, Higher Executive Officers act as ECMs and are responsible for routine quality assurance checking of decisions made by ECOs. ECO decision makers are mostly Executive Officers, with some Administrative Officers. Visa application decisions are quality assured by ECMs in line with V&C’s ‘Review to Risk’ (R2R) matrix.

7.30 Originally, R2R strategies were generated by each DMC. However, from April 2017, a standard R2R strategy applied in all regions. This followed recommendations from the ICIBI and internal audits about the need for greater clarity in the R2R process, including defining why an assurance check was being conducted, confirmation that R2R was being consistently and effectively applied, and ensuring that factors other than risk were being considered.

³⁸ An internal UKVI review of Indian applications in September 2018 found that 65 per cent of those streamed RED and 88 per cent of those streamed AMBER were issued, concluding that the streaming criteria “could be tighter”.

7.31 The standard R2R strategy involved:

- Baseline Reviews, which “must be adhered to 100% on a daily basis”
- Tactical Operational Reviews, focusing on a specific element of the decision-making process or stream, ensuring that rules are being applied correctly
- ECM Approval, where the ECO is required to refer particular types of cases, for example Family Reunion applications, to the ECM for their approval of the proposed decision³⁹
- Full Quality Assurance (FQA) review, looking retrospectively at the decision and at the quality of the issue notes or refusal notice

7.32 According to the evidence seen by inspectors, some exemptions to this process had been authorised by management due to ECM shortages, including dispensation to carry out ‘light touch’ reviews.

7.33 Under ‘Baseline Reviews’, the R2R matrix indicated that ECM Approval was required for cases streamed RED that the ECO proposed to issue, and those streamed GREEN where there had been no enrichment or adverse information received and the ECO proposed to refuse, required ECM Approval. The accompanying comment for the latter read:

“Green cases should normally fall to be issued; if [the] streaming tool is being refined and utilised appropriately the number of cases that are refused should be minimal.”

Decision quality

7.34 In addition to the R2R checks, V&C carries out other ad hoc quality assurance checks of entry clearance decisions to identify where improvements are required. The evidence provided for this inspection included reports of data quality inspections, audits, quarterly checks and Integrity Manager⁴⁰ inspections.

7.35 No evidence was provided of specific ‘before and after’ analyses of decision quality when particular DMCs were closed and the work consolidated elsewhere. However, inspectors noted the results of a data quality exercise conducted at the Croydon DMC in September 2018 by a V&C senior manager from an overseas DMC.

7.36 A total of 130 decisions made by the Croydon DMC were examined, including 30 AMBER-RED Refusals.⁴¹ The report identified that:

“

- The Croydon DMC has been working its visit queue on or around Day 15 for the past 10 months (since November 2017);
- Scheduled and unscheduled consolidations stretched the available staffing complement beyond its limit – as recruitment lagged behind demand;
- In summer, a discrete team of 30 agency staff working ‘twilight’ hours kept the AO⁴² support performance at pace with demand, and within CSS1,⁴³

39 UKVI’s Operational Instructions state that a referral from an ECO to an ECM can be oral.

40 The Integrity Manager’s responsibilities include “assuring the end to end visa process through proactive testing of assets, systems and personnel”, “completing a monthly assurance checklist and analysing the results”, “helping commercial partners to identify and mitigate risks in their operations, ensuring adherence to contractual service level agreements”, and managing the collation of Operating Mandate breaches.

41 Applications streamed either AMBER or RED where the decision was to refuse.

42 Administrative Officer.

43 The CSS that 90 per cent of straightforward out of country non-settlement visa applications will receive a decision within 15 working days.

- Consolidating the Russia visit cohort at extremely short notice was an extra intake requiring a further surge team of AODMs, which meant even fewer HEO reviews;
- This summer's intake meant the available six HEOs, and two SEOs could only conduct light-touch reviews on the decisions of 45 staff [34 EOs, 11 AODMs];
- July trawls at SEO (1), HEO (10) and EO (40) levels have yielded 51 successful candidates who will join the DMC in October;
- Moving decisively away from Day 15, and with a new intake of staff, allows some sampling of cases for a workshop to improve decision quality in the Croydon DMC as North America, Kuwait, Oman and Nigeria visits move in by 31-Dec-18."

7.37 The report recommended a follow-up exercise to take place in February 2019 to gauge progress after a planned series of decision quality workshops and when the DMC was expected to have a full complement of HEOs. As at April 2019, inspectors saw no evidence that either the follow-up exercise or the workshops had taken place.

Levels of experience – Staff retention

7.38 Issues with staffing and decision quality at the Croydon DMC were not new. ICIBI's report 'An inspection of entry clearance processing operations in Croydon and Istanbul (November 2016 – March 2017)', published in July 2017, which focused on Settlement and Family Visit visas, identified that Croydon had operated for many months with a significant shortfall in ECMs and was well below its agreed headcount overall. The report contained five recommendations, the first two of which, both 'Accepted' by the Home Office, addressed DMC resourcing and decision quality.

7.39 In its response, the Home Office referred to the ECO and ECM 'cadre', established by UKVI in 2013, which ensured that on completion of an overseas posting, ECOs and ECMs "can be retained within UKVI and can be posted to Decision Making Centres in Croydon or Sheffield", and to its 'Consecutive Postings Policy', under which staff were limited to no more than two consecutive overseas postings and must have completed a minimum of two years of work in the UK before being eligible for another overseas posting.

7.40 In relation specifically to ECMs, the Home Office response to the 2017 inspection noted that these were:

"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."

7.41 In July 2019, the Home Office confirmed to inspectors that the 'Consecutive Postings Policy' was still in operation. The last recruitment campaign for the cadre had been conducted in October 2016. This had been an open competition advertised through Civil Service Jobs. The most recent recruits to long-term overseas ECO posts were selected via an Expression of Interest trawl, which ran in September 2018 and was restricted to existing V&C caseworkers.

7.42 In August 2019, V&C senior management at Croydon told the ICI that staffing levels there were currently not an issue, particularly as the DMC had just successfully weathered the peak period for applications, from which the newer staff had gained valuable experience. Earlier in 2019, there had been an ECM recruitment campaign, which meant that ECMs were up to strength.

Encouragingly for the unit's ECOs, five had been successful in applying for promotion to ECM. However, Croydon still relied to an extent on agency staff, and a number of them would prefer to become Home Office employees (the terms were better) but were unable to apply until the next recruitment exercise.

Short-term deployments

- 7.43** Inspectors requested details of the number of short-term staff deployments to DMCs, including the durations and costs (broken down by travel, accommodation and subsistence) covering the period 2015 to 2018. The Home Office provided data for deployments from V&C's central pool of temporary resources where these were to cover a staffing gap, provide additional resource during peak periods, or to cover a short-term increase in demand that had not been forecasted or an unforeseen staff shortage – see Figure 10.

Figure 10: Deployments from the V&C central pool of temporary resources 2016 to 2018

Receiving Post DMC closure date	2016		2017		2018	
	Number of staff	Total duration (months)	Number of staff	Total duration (months)	Number of staff	Total duration (months)
Abu Dhabi	34	118	6	17	13	49
Abuja Closed Dec 2016	1	8	1	4	0	0
Accra Closed May 2016	0	0	0	0	0	0
Amman	14	34	3	8	5	15
Bangkok Closed Jul 2018	12	45	10	30	5	22
Beijing	0	0	1	3	10	45
Bogota	1	6	0	0	0	0
Chennai	18	57	5	19	21	61
Croydon	29	79	30	76	6	17
Islamabad Closed Apr 2015	0	0	1	4	0	0
Istanbul	7	24	0	0	16	67
Kuwait Closed Oct 2016	1	5	0	0	0	0
Lagos Closed Dec 2016	2	6	0	0	0	0
Manila	9	40	5	16	9	29
Moscow Closed Apr 2018	1	1	0	0	0	0
Mumbai Closed Sep 2015	1	5	0	0	0	0
New Delhi	44	129	18	76	59	222
New York Closed Oct 2018	0	0	0	0	0	0
Paris Closed Jan 2016	2	4	0	0	0	0
Pretoria	14	39	13	43	15	48
Riyadh	2	3	2	14	1	3
Sheffield	12	33	32	79	1	1
Warsaw	9	22	7	21	3	19
Total	213	658	134	410	164	598

- 7.44** Figure 10 suggests a heavy reliance on the central pool of temporary resources, particularly at certain posts, notably New Delhi and Chennai.
- 7.45** Inspectors were told that where staff were not available from the central pool, some staff were moved from their permanent DMC to another DMC for periods of a week or two. However, no central record was kept of these short-term transfers or the associated costs. With regard to costs more generally, the Home Office was unable to provide travel and subsistence data broken down by DMC as this information was recorded only at a regional level.

Other indicators

UKVI International Contact Centre Service

- 7.46** Between 2014 and 2017, the in-country and international Contact Centre Services were delivered by two commercial providers, Hinduja Global Solutions (HGS) and SITEL. Both contracts expired at the end of May 2017. From 1 June 2017, SITEL UK LTD was contracted to operate these services under a single contract.
- 7.47** At the time of the inspection, out of country visa applicants were able to telephone the Contact Centre 24-hours a day Monday to Friday.⁴⁴ From 2014-15, calls were charged at £1.37 per minute, excluding standard network charges. As at 2019-20, this had not increased. In 2014-15, a 10-minute webchat cost £4.00.⁴⁵ With effect from 2017-18, an enquiry by email (or series of emails relating to the same enquiry) cost £5.48. As at 2019-20, this had not increased.
- 7.48** The data for emails, calls and use of the web portal (see Figure 11) provided by the Home Office raised more questions than it answered. It showed a broadly constant level of usage throughout the period that HGS held the contract. Apparently, the pattern of usage changed dramatically under SITEL UK LTD, with emails running at around one to two per cent of the previous rates and calls at 30-40 per cent. No explanation was offered.

Figure 11: Number of emails, calls and web portal correspondence 2015-16 to 30 September 2018

Period	Emails	Calls	Web portal	Total
2015-16	701,682	487,783		1,189,465
2016-17	648,061	491,275		1,139,336
2017-18 to 31 May	108,789	101,491		210,280
2017-18 from 1 Jun	7,649	172,372	70,675	250,696
2018-19 to 30 Sep	3,432	145,986	53,464	202,882

- 7.49** The data for HGS was not broken down by visa route and type of enquiry, but the SITEL UK LTD data included a breakdown of the top ten reasons for each.

44 Arabic lines are open on Sundays.

45 The web chat service provided by HGS ran only for the first month of service in April/May 2014.

7.50 This showed that in the first half of 2018-19 the largest number of enquiries (over 40 per cent of the total of 202,882) were in connection with a 'standard' Visitor Visa application, which is unsurprising given the overall volumes of such applications compared to other visa categories. The next largest numbers were for Settlement and PBS Tier 4 enquiries (which together accounted for a further 25 per cent of the total). Around 30 per cent of all enquirers were seeking an update on their application (in two-thirds of these cases the application was still within the published CSS decision time). A further 15 per cent were recorded as enquiries about processing times/Service Standards.

Complaints

7.51 Inspectors asked V&C for the number of complaints received, broken down by DMC, country and category of visa application, and nature of complaint and outcome, for the period 2015-16 to 2018-19.

7.52 V&C provided complaints data by region and complaint type for 2017-18 and 2018-19. This showed the number of complaints that had received a response, the reason(s) for the complaint and the relevant business area. It was not broken down by DMC, country, visa category, complaint type or outcome.

7.53 The data was caveated:

"Data shown is not published transparency data and has been taken from a 'Smart Survey' database that is separate from the CMS⁴⁶ system. This data is used for internal Management Information purposes only and is not for publication. As the data is separate from the CMS system and is reliant on caseworkers completing it after each case, it is recognised that it is not 100% accurate. Therefore the data shown is a reasonable representation as opposed to performance data. Please note that this data only covers 2017/18 and 2018/19."

7.54 In fact, the data provided covered the four quarters of 2017-18 plus the first quarter of 2018-19 only. It was broken down by region rather than by DMC. As with the enquiries to the Contact Centre, the largest number of complaints received in each quarter in each region related to 'standard' Visitor Visas, except for in the Americas region in 2017-18 Q2 and Q3, where it was recorded as 'Family Member (Settled in UK/British)'. There was less consistency to the nature of the complaints from quarter to quarter, but 'Expedite Decision' was often the top reason and almost always within the top five.

Administrative Reviews

7.55 Administrative Reviews consider whether an 'eligible decision' is wrong because the decision maker has made an error. If so, the Administrative Review process is supposed to correct that error.

⁴⁶ Complaints Management System, which is used by BICS complaints handling teams to record and manage complaints and responses.

7.56 Published guidance about Administrative Reviews states that “a person who has received an ‘eligible decision’ on an entry clearance application may apply for an administrative review”. It goes on to explain that:

“For applicants overseas, an eligible decision is a decision to refuse an application for entry clearance made on or after 6 April 2015, unless the application is:

- as a short term student made under part 3 of the Immigration Rules
- under Appendix EU (Family Permit)
- as a visitor
- a human rights claim.”⁴⁷

7.57 The Home Office (UKVI) provided data for out of country Administrative Reviews processed between April 2015 and 30 September 2018 – see Figure 12.⁴⁸

Figure 12: Number of out of country Administrative Reviews processed between 6 April 2015 and 30 September 2018

Period	Total ARs	Upheld decisions	Overtaken decisions	Top category	Top nationalities	Top DMC
2015-16	1,614	1,365 (84%)	143 (9%)	Tier 4 (891)	N/A	N/A
2016-17	2,303	1,503 (65%)	618 (26%)	Tier 4 (1,049)	Pakistani Indian Nigerian	Abu Dhabi (651)
2017-18	6,470	4,100 (63%)	1,787 (27%)	Tier 4 (3,009)	Pakistani Indian Chinese	Sheffield (4,649)
2018-19 to 31 Sep	2,577	1,948 (75%)	542 (21%)	Tier 4 (1,167)	Pakistani Indian Nigerian	Sheffield (1,419)

7.58 In each year, the second highest category for Administrative Reviews was Tier 1 applications (335, 511, 1,027 and 426). V&C told inspectors that the increase in Administrative Reviews reflected the overall increase in PBS applications. Since Tier 4 applications account for roughly two-thirds of PBS applications, it follows that Tier 4 should be the top category for Administrative Reviews, but this does not fully explain the scale of Tier 1 Administrative Reviews, since the numbers of applications are small in relation to Tiers 2 and 5. Nor is the ‘spike’ in Tier 4 Administrative Reviews in 2017-18 explained by application volumes. A more plausible explanation is that the number of Administrative Reviews were a consequence of the onshoring problems experienced by the Sheffield DMC.

⁴⁷ Home Office guidance – Administrative Reviews V9 dated 23 April 2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/796899/Admin-review-guidance-v9.0.pdf

⁴⁸ Separately, the Home Office Performance Reporting and Analysis Unit (PRAU) provided Administrative Review (ARs) data for an inspection of AR processes that were running in parallel with the Network Consolidation inspection. The PRAU data differed from the UKVI data, showing significantly higher totals for 2015-16 and 2016-17. The Home Office explained that what, how and by whom data relating to ARs had been recorded had changed over time.

Pre-Action Protocols

- 7.59** Inspectors asked V&C for the number of Pre-Action Protocol letters received, broken down by DMC, country and category of application, complaint type and outcome for the period 2015-16 to 2018-19.
- 7.60** The data provided by V&C was in a variety of formats, some of which did not cover the period requested and most of which omitted the category of visa application, complaint type and outcome. It was therefore of little value to inspectors in trying to understand what difference, if any, onshoring had made. Moreover, it was hard to see what learning V&C would be able to derive from this information either locally (at DMC-level), regionally or globally, given the haphazard way it was being recorded.

Judicial Reviews

- 7.61** Inspectors also asked V&C for equivalent data about Judicial Reviews (JRs). The data provided covered the period from 1 April 2016 until 30 September 2018 and related to Upper Tier Tribunal and High Court JRs. It was taken from the Home Office’s JR workflow tool, JIRA, which has been in place since March 2016, and was caveated as “management information” and “therefore provisional and subject to change”.

Figure 13: Number of JRs served on the Home Office between 1 April 2016 and 30 September 2018

Final claim outcome	2016-17	2017-18	2018-19 to 30 Sep
No final claim outcome added to date	15	138	279
Allowed (Substantive Hearing)	4	1	
Closed by Court	37	61	3
Concede (No Fault)	48	23	11
Concede (SSHD Fault)	238	233	64
Dismissed (Substantive Hearing)	6		
Permission Refused (Oral)	72	48	3
Permission Refused (Paper)	245	153	19
Permission to Appeal Refused		1	
Struck Out	27	5	2
Withdrawn by Claimant	26	18	3
Total	718	681	384

- 7.62** The data was not broken down by DMC. However, it did provide the claimant’s nationality for those JRs that had resulted in a concession (‘no fault’ and ‘Home Secretary (SSHD) fault’) or ‘Allowed (Substantive Hearing)’. This showed that in 2016-17, the largest number of concessions were to Pakistani claimants, who made up over a third of the total, with Indians, Bangladeshis, Nigerians and Sri Lankans next (in that order).

- 7.63** In 2017-18, Pakistanis were again the largest cohort and made up just over a third of the total, with Bangladeshis, Nigerians, and Indians next (in that order) followed by Sri Lankans and Ghanaians on the same number. The first half of 2018-19 saw Pakistanis and Nigerians on almost the same number (18 and 17 respectively), with Bangladeshis the only other nationality in double figures (12).
- 7.64** From the data provided, it is not possible to draw any conclusions about whether onshoring has had an effect on JRs, either in terms of the overall numbers or the numbers conceded. Looking at the top nationalities for concessions, the Colombo DMC was closed in February 2013, Islamabad in April 2015, Mumbai and Dhaka in September 2015, Accra in May 2016, and Abuja and Lagos in December 2016. However, at the time of the inspection the Chennai and New Delhi DMCs remained open.

Findings from the four visited DMCs

Croydon, Sheffield, Manila and Warsaw

- 7.65** Inspectors visited the Croydon, Sheffield, Manila and Warsaw DMCs between 25 February and 22 March 2019. At the time, Croydon DMC was a hub for Visitor Visa applications, while Sheffield DMC dealt with Net Migration applications. Warsaw was due to close by the end of the 2019-20 financial year and Manila DMC was expected to close by the end of the 2020-21 financial year.

Staffing

- 7.66** UKVI provided the funded headcounts (full-time equivalents) for each of the DMCs – see Figure 14. This gives an indication of the extent to which decision making is now concentrated in the UK DMCs.

Figure 14: **Funded headcount for Croydon, Sheffield, Manila and Warsaw DMCs as at September 2018**

DMC	G6	G7	SEO	HEO	IO	EO	AO	AA	Total
Croydon	0	1	3	12	2	51	139	5	213 ⁴⁹
Sheffield	2	2	8	34	0	129	370	0	545
Manila	0	0	1	4	0	17	11	44	77
Warsaw	0	0	1	2	0	14	9	12	38

Daily expectations

- 7.67** Fully-trained decision makers at each of these DMCs have ‘daily expectations’ (formally known as ‘benchmarks’). These take account of the category of visa application and the risk rating according to the Streaming Tool. UKVI provided the daily expectations for decision makers at Croydon, Sheffield, Manila and Warsaw – see Figure 15.

⁴⁹ In August 2019, the ICI was told by the Croydon DMC that its headcount had increased to c. 280.

Figure 15: Number of decisions expected per day per fully-trained decision maker by visa category and risk rating

Category	Croydon			Sheffield			Manila			Warsaw		
	R	A	G	R	A	G	R	A	G	R	A	G
EEA family permit	36	36	36	18	27	54.9	27	31.5	84.6	20.7	20.7	20.7
Other non-Settlement	22.5	27	54	18	27	54.9	27	31.5	84.6	27	34.2	54
PBS Tier 1	19.8	19.8	19.8	18	27	54.9	27	31.5	84.6	20.7	20.7	20.7
PBS Tier 2	19.8	19.8	19.8	18	27	54.9	27	31.5	84.6	20.7	20.7	20.7
PBS Tier 4	19.8	19.8	19.8	18	27	54.9	27	31.5	84.6	20.7	20.7	20.7
PBS Tier 5	19.8	19.8	19.8	18	27	54.9	27	31.5	84.6	20.7	20.7	20.7
Settlement	10.8	10.8	10.8	10.8	10.8	13.5	27	31.5	84.6	7.2	7.2	7.2
Short-term student	22.5	27	54	18	27	54.9	27	31.5	84.6	27	34.2	54
Visit	22.5	27	54	18	27	54.9	27	31.5	84.6	27	34.2	54

7.68 Explaining the different daily expectations, V&C told inspectors:

“the variance between different regions doing the same categories is process driven, demand driven, complexity driven and some areas are at different stages on the digitization journey.”

7.69 Inspectors heard from V&C staff and saw for themselves slow upload speeds, and delays and errors with IT systems. Overseas, DMCs rely on Foreign and Commonwealth Office (FCO) platforms and systems and inspectors were told by V&C senior managers that they were working with the FCO, as well as with Home Office Estates and IT, and transformation teams, to improve IT provision and procure new servers.

7.70 However, even allowing for these variables, the data appeared to contain several anomalies and inspectors queried whether it was correct. The Home Office responded that:

“Productivities are provided by business planners and many of the posts have included productivities for routes they no longer undertake: these haven’t been factored into resource modelling. In the instance of net migration work having to move to Croydon or an overseas DMC because of a critical incident those benchmarks would be reviewed and revised.”

Grants, refusals and ECM reviews

7.71 The Home Office provided data for grants and refusals of visa applications (all categories) for the four DMCs for each calendar year from 2015 up to 31 October 2018. It also provided data for ECM reviews and outcomes for the same period – see Figures 16 to 19.

Figure 16: **Croydon: Applications granted and refused in each calendar year from 2015 to 31 October 2018**

Year	Granted	Refused	Total	ECM review	Overtured
2015	91,261 (87%)	13,386 (13%)	104,647	11,014 (10.52%)	243 (2.21%)
2016	126,212 (84%)	23,377 (16%)	149,589	14,025 (9.38%)	281 (2.00%)
2017	173,544 (82%)	37,200 (18%)	210,744	21,708 (10.30%)	2,423 (11.16%)
2018	220,038 (84%)	43,102 (16%)	263,140	33,937 (12.90%)	706 (2.08%)

Figure 17: **Sheffield: Applications granted and refused in each calendar year from 2015 to 31 October 2018**

Year	Granted	Refused	Total	ECM review	Overtured
2015	59,940 (68%)	28,436 (32%)	88,376	11,239 (12.72%)	369 (3.28%)
2016	71,363 (60%)	46,965 (40%)	118,328	20,554 (17.37%)	984 (4.79%)
2017	315,429 (81%)	73,102 (19%)	388,531	50,627 (13.03%)	1,983 (3.92%)
2018	261,507 (79%)	68,391 (21%)	329,898	33,959 (10.29%)	1,529 (4.50%)

Figure 18: **Manila: Applications granted and refused in each calendar year from 2015 to 31 October 2018**

Year	Granted	Refused	Total	ECM review	Overtured
2015	206,190 (96%)	9,278 (4%)	215,468	13,515 (6.27%)	153 (1.13%)
2016	279,610 (97%)	9,306 (3%)	288,916	15,384 (5.32%)	204 (1.33%)
2017	248,880 (95%)	12,523 (5%)	261,403	11,847 (4.53%)	2,266 (19.13%)
2018	241,780 (96%)	10,281 (4%)	252,061	13,649 (5.41%)	383 (2.81%)

Figure 19: **Warsaw: Applications granted and refused in each calendar year from 2015 to 31 October 2018**

Year	Granted	Refused	Total	ECM review	Overtured
2015	59,390 (79%)	15,901 (21%)	75,291	6,372 (8.46%)	251 (3.94%)
2016	62,979 (79%)	16,490 (21%)	79,469	5,390 (6.78%)	151 (2.80%)
2017	73,959 (84%)	13,838 (16%)	87,797	9,180 (10.46%)	5,621 (61.23%)
2018	72,681 (87%)	10,473 (13%)	83,154	9,724 (11.69%)	357 (3.67%)

Compensation payments

7.72 The Home Office provided figures for compensation payments made by each of the four DMCs in each calendar year from 2015 to 17 September 2018 – see Figure 20. These show significant increases for the two UK DMCs. V&C (formally UKVI International Group) made compensation payments to visa applicants of £226k over this period. Since 2017-18, the Sheffield DMC has accounted for more than half of the sums paid out.

7.73 Compensation claims are made for a number of reasons, including administrative errors, delays, missed flights, incorrect advice, lost documents and poor communications. V&C senior management commented that the increases in payments could not be attributed to network consolidation without further analysis (a ‘deep dive’) of the performance of the UK DMCs, which may now be possible as the work had started to settle down.

Figure 20: Compensation payments made by V&C each year from 2015 to 17 September 2018 for Croydon, Sheffield, Manila and Warsaw and for V&C overall

Period	Croydon	Sheffield	Manila	Warsaw	V&C overall
2015-16	£497.42	£2,177.74	£262.91	£100 + 198 Euro (c. £178.01) = £278.01	£29,681.29
2016-17	£497.42	£588.88	£969.61 + US\$31 (c. £23.78) = £993.39	£7,907.28 + 198 Euro (c. £178.01) = £8,085.29	£49,892.75
2017-18	£10,136.82	£35,466.01	£3,586.13	£2,555.81	£70,700.65
2018-19 to 17 Sep	£7,287.43	£39,067.57	£121.10	£6,264.88	£76,050.59
Total	£18,419.09	£77,300.20	£4,963.53	£17,183.99	£226,325.28

Forgery detections

7.74 Figure 21 shows a reduction in forgery detections year-on-year at Sheffield and Warsaw since 2015-16 and at Croydon and Manila since 2016-17.

Figure 21: Number of forgery detections made from 2015 to 30 September 2018 at Croydon, Sheffield, Manila and Warsaw and for V&C overall

Period	Croydon	Sheffield	Manila	Warsaw	V&C overall
2015-16	95	2,552	214	629	16,280
2016-17	287	2,004	383	217	10,792
2017-18	217	1,806	125	81	6,610
2018-19 to 30 Sep	72	1,146	31	0	3,656
Total	671	7,508	753	927	37,338

7.75 Inspectors asked the Home Office whether the reduction in forgery detections indicated a different approach. A V&C senior manager told inspectors that:

“[the] focus is trying to move away from chasing the van. Always been the case in the past to verify or conduct a check where you were going to refuse anyway. Document verification teams moved away from this and now enrichment teams. Grounds to issue – balance of probability. You are still refusing now but not racking it up as a forgery detection. A lot of the work we are doing there is no place for that. Slows down the decision making.”

The practitioner perspective

Loss of local knowledge

7.76 At all four DMCs visited by inspectors, entry clearance staff and managers raised concerns about the loss of local knowledge and understanding of local processes as a result of network consolidation. At the Croydon DMC, staff and managers suggested that V&C should create a shared toolkit/library where local knowledge could be stored and accessed promptly.

7.77 However, senior management was less convinced of the need for local knowledge, since V&C had a body of data and evidence that enabled it to assess risks objectively and access open source material should this be needed. Writing to the Independent Chief Inspector, a senior manager commented:

“As you will know, all of our DMCs use outcome-based data alongside local intelligence alerts to stream and route applications. This allows us to ensure that the appropriate risk data is available to decision makers and that processes and decision making are based, in the main, on auditable and evidenced attributes.

While ‘local knowledge’ can benefit decision making it can also embed poor practice and lead to inconsistent outcomes. It is also, by its nature, not available to decision makers beyond that locality meaning that historically a decision maker deciding an application for leave to remain from (for example) a Nigerian national in the UK had little access to the knowledge of decision makers in a DMC in Lagos or Abuja.

Moving from this to a more structured and evidenced based approach to the processing of applications, and working with IEI, allows us to capture local attributes through the streaming tool while also ensuring that that knowledge is used in a consistent and auditable manner. Relying on systems and tools to identify risk also allows us to ensure that that risk analysis is available to all caseworkers not just those with experience working in certain locations.

We have been undertaking much of our work in locations away from the country of submission for many years and we are not aware of any empirical evidence that this has led to an increase in negative outcomes or a reduction in control. Indeed, exit check data shows a high level of customer compliance. We are, however, not complacent and continue to monitor indicators such as refusal rates to ensure that we are taking risk properly into account when deciding applications.”

7.78 Staff in Manila and Warsaw suggested that their attention to detail might not be replicated in the UK. They told inspectors that they had not been approached to share their local knowledge when workstreams had been transferred back to the UK or now that it had been decided that the DMCs would close. Neither entry clearance staff nor managers at the DMCs could recall any formal mechanisms for providing their thoughts on network consolidation to senior management.

7.79 However, inspectors were told by staff in Croydon that before the Visitor Visa workstream from Jamaica was onshored in the summer of 2018, two decision makers from the New York DMC

(which handled applications from Jamaica) had come over to pass on as much local knowledge and experience as they could prior to the handover.⁵⁰

Reduced decision quality?

- 7.80** Some staff in the Croydon DMC felt that network consolidation and the expansion of the UK DMCs had been forced through at the cost of decision quality. They said that they were often praised for processing high numbers of applications, however the quality was rarely checked. Likewise, some overseas-based staff who had worked in a UK DMC on temporary secondments expressed concerns that the quality of work may have been diluted since onshoring.
- 7.81** Concerns were expressed about an over-reliance on agency staff to fill roles at the Croydon DMC. Meanwhile, newly-recruited Administrative Officer decision makers referred to being under pressure to deliver and to the fact that they found operational practice difficult at first. They felt they would benefit from designated and experienced trainers to help support them in their role.
- 7.82** UK-based managers said that decision makers needed to be in place ahead of any work being onshored. Often headcounts were thought to be sufficient but this ignored the lack of experience. Decision makers in Sheffield and Croydon recalled times when they “crashed and nearly burnt” due to the volumes of applications and the numbers and experience of staff available to deal with them.
- 7.83** Some staff told inspectors that they had only recently become aware of the review and recommendations by the HM Passport Office Chief Operating Officer following the problems in the Sheffield DMC in the Spring and Summer of 2017. However, V&C staff who had been in Sheffield during 2017 said that there had been obvious improvements and that communication about network consolidation was better.

Streaming and enrichment

- 7.84** A number of decision makers told inspectors that there was an over-reliance on the Streaming Tool to identify the risks within an application rather than on their abilities and that the role of the ECO was being “dumbed down” as a result. However, managers stressed that the Streaming Tool only highlighted known risks and it was still for the decision maker to evaluate all of the evidence in front of them.
- 7.85** At all four DMCs staff told inspectors they felt managers were reluctant to authorise deferring a decision in order to carry out further checks because of the workloads and instead they felt forced to make a decision based on whatever information they already had.
- 7.86** At Manila, managers said that it would be important to have local profiles fed into the Streaming Tool for it to be effective once the work had been onshored. However, ECMs in the UK DMCs felt that most of the streaming updates were originating from Casework Intelligence (part of Immigration Intelligence with some staff based overseas and others in the UK), rather than from entry clearance staff picking up on trends or anomalies.
- 7.87** Some staff were concerned about potential “blind spots” in the enrichment and verification processes due to time differences between the UK and the country of application and because the mechanisms to conduct sufficient checks were lacking.

⁵⁰ At the factual accuracy stage, the Home Office noted that “staff from Bogota DMC were seconded to Croydon and Sheffield DMCs to facilitate the transfer of work before the closure of Bogota.”

- 7.88** Decision makers raised concerns about the quality of scans and the inability as a result to detect forgeries. They also stated that various IT issues had an impact on their overall efficiency in processing applications.

Looking ahead

Information Technology – ATLAS

- 7.89** At the time of this inspection, V&C was using a system called Proviso to process and record visa applications. Proviso sits on an FCO IT platform called Firecrest. Each decision maker in the UK therefore requires a Firecrest terminal as well as a Home Office terminal on which they run various checks. For system security reasons, Firecrest terminals must be placed only in 'secure' areas within Home Office buildings.
- 7.90** The Home Office pays the FCO to supply and maintain the Proviso network. Proviso uses a number of servers and data needs to be transferred from each server to a central processor for network-wide data to be compiled and used.
- 7.91** V&C plans to move the processing of visa applications to ATLAS, the Home Office's new caseworking system. ATLAS has been in development for some years and is gradually being rolled out to BICS business areas. At the time of this inspection, it was being piloted on leave to remain applications. Inspectors observed decision makers using ATLAS for Tier 4 applications and noted that it was significantly easier and more efficient to use than CID.
- 7.92** Rollout of ATLAS across V&C will be incremental and will involve the transfer of historical records and data from Proviso to ATLAS. UKVI was unable to provide inspectors with any timescale for the rollout.

Storage of scanned documents

- 7.93** Under the working model in operation at the time of this inspection, the Home Office's commercial partners providing the VACs store scans of applicants' supporting documents and evidence on their own servers. When a decision maker requires sight of the scanned documents they have to access a restricted area on the relevant server.
- 7.94** V&C has to inform their commercial partners when a new decision maker starts so that they can be given the necessary system access rights. Similarly, when someone leaves, the commercial partner must be notified to prevent unauthorised future access to applicants' personal data. This is an administrative burden and V&C would like to move to a model where the commercial partners send the scanned images to the Home Office for it to store, since this would be more efficient. However, currently this is not possible.

Expansion of the PBS Tier 4 caseworking model

- 7.95** In early 2018, V&C began piloting a new caseworking model for PBS Tier 4 Student applications. Previously, decision makers had worked either on visa applications made in the UK or on applications made overseas. Under the revised model, decision makers worked on both.
- 7.96** The new model offered benefits in terms of resource planning and use, with V&C able to be more flexible and to respond better to seasonal peaks in applications. In-country applications typically peak in September, while out of country applications peak in August. For decision

makers, the new model offered some variety in their work and broadened their knowledge and experience.

- 7.97** V&C told inspectors that the revised model of working had been a success and as a result, in 2018, the processing of both in-country and overseas Tier 4 applications was within CSS and achieved without a major incident. The data provided to inspectors appeared to bear this out, as did the evidence obtained from stakeholders, although the latter was not wholly positive, in particular regarding what stakeholders considered was excessive and ill-informed use of credibility interviews.

Croydon caseworking strategy

- 7.98** Inspectors asked managers in Croydon and Consolidation Board members what strategies had been considered to mitigate the concerns expressed by staff and others about the loss of 'local knowledge' when deciding Visitor Visa applications.
- 7.99** Inspectors were told that one option was to arrange the work along country or regional lines, so that decision makers became familiar with particular geographical, social and cultural factors that applicants had in common. Another suggestion was to create a more comprehensive database of background materials to assist decision makers, especially the less experienced.

Working relationship with Immigration Intelligence

- 7.100** V&C has relied on Immigration Enforcement Intelligence (IEI) to investigate trends and scenarios that may indicate abuses of the visa system and to feed back results as alerts or inputs to the Streaming Tool. Traditionally, V&C and IEI (formerly RALON) staff working together at overseas posts have enjoyed close working relationships. As V&C has withdrawn from overseas posts, the opportunities to engage directly with IEI colleagues have reduced, albeit 19 IEI staff are co-located with V&C in Sheffield and 13 in Croydon.
- 7.101** Some V&C staff told inspectors they feared that V&C's requirements would become a lower priority for IEI. This will depend in part on whatever other priorities IEI has and how well it is resourced but also on V&C's ability to articulate its requirements clearly and persuasively. V&C may therefore need to reconsider and redefine its working relationship with IEI.

'Rapid Response Team'

- 7.102** Inspectors were told about plans to establish a Rapid Response Team (RRT) within V&C with a remit "to adapt and respond swiftly in the event of both anticipated, and unexpected, surges to maintain service standards and prevent the development of build-ups across the core routes of Visits, Study, Work and Settlement Casework". It was expected that the RRT would comprise around 15 ECOs with two or three ECMs.

Brexit

- 7.103** At the time of this inspection, the continuing uncertainties surrounding Brexit meant that UKVI was unable to plan in detail for any impacts it might have on the demand for visas. Inspectors saw evidence that, insofar as it was able, V&C management had given thought to how Brexit could affect the allocation of work within the UK.

8. Inspection findings – Communication and consultation

Network Consolidation Programme

The move to Phase 2

- 8.1** It is easy to see how, from a Home Office perspective, the Network Consolidation Programme was the logical next step in the process of moving from having visa posts in most countries, to a hub and spokes model, to onshoring visa decision making to the UK, technology and capacity permitting.
- 8.2** While Phase 1, which began in mid-2015, after UKVI had received ministerial approval for a programme of consolidation of net migration routes, had encountered problems these were essentially logistical ones, solved by improving programme governance. The strategy itself was not seriously questioned. The financial argument alone was overwhelming.
- 8.3** Completion of Phase 1 was delayed, from the end of 2017 to early 2019, but planning for Phase 2 went ahead in mid-2018, with the objective of further reducing the number of overseas DMCs.
- 8.4** In October 2018, a Phase 2 Options Paper was prepared for UKVI senior management. It recommended which of the then remaining 11 overseas DMCs should be considered for closure in Phase 2. The recommendations considered and weighed the Political, Environmental, Economic, Technical and Operational factors for each location. These included the current security situation and the future availability/desirability of leasing space from the Foreign and Commonwealth Office (FCO), as well as application volumes.
- 8.5** The Options Paper made clear that: “From a customer perspective, it is essential that service offerings, and global processes, are consistent, and that applications are always presented in the same way, irrespective of location.” In discussion with inspectors, V&C managers repeated that it was their aim for V&C’s processes to be “location agnostic”, meaning that an applicant should receive the same level of service in terms of response time, decision quality and outcome, wherever the decision was made.
- 8.6** A meeting of UKVI senior managers held on the 22 November 2018 decided that:
- Bogota, Warsaw and Riyadh would close in 2019-20
 - Chennai and Manila would close in 2020-21

Communicating the Phase 2 plans to Home Office staff

- 8.7** In November 2018, the Director for Visas & Citizenship emailed staff to update them on these plans. The email explained that by early 2019, all net migration work would have been moved back to the UK, and that Sheffield, Liverpool and Croydon would between them be handling c. 30 per cent of global demand. The Director wrote that Phase 1 changes had enabled V&C

“to deliver the best service possible and improve the quality and consistency of that service” and that it was focused on investing in people, and “building a flexible and responsive network which will also be more efficient and lower cost”.

- 8.8** On the timetable for the planned closures, the Director explained that the Executive Board had decided that work from Bogota, Warsaw, and Riyadh would be consolidated by April 2020 and work from Chennai and Manila by April 2021. Meanwhile, V&C would be “reviewing our footprint in China and will make a final decision in the first half of 2019 on how we proceed there”. Also in 2019, V&C intended to consider whether any changes were required in those locations where there were now no decision makers but there was still a Home Office presence “to support some element of the dispatch process”.
- 8.9** The email recognised that the news would be unwelcome for many staff and referred to further local and personalised briefings, with the aim of providing some certainty and support. The Director was also keen to assure staff that the closure decisions did not reflect on the quality of the work at those posts and to encourage them to remain committed. It also apologised for the fact that some people had learned of these plans before receiving formal notification, observing that “This is also the first time that we have been clear about our future plans so far in advance of implementation.”

Prior consultation and communication

- 8.10** The November 2018 email was clear and demonstrated an understanding of the impact Phase 2 would have on Home Office staff. However, given the length of time over which the consolidation strategy had evolved, the difficulties it had encountered, and the many people it had and would affect, inspectors looked to establish how widely the Home Office had consulted and sought buy-in for its plans before reaching its decisions.

UK-based DMC staff

- 8.11** UK-based Home Office staff are posted overseas to work as Entry Clearance Officers (ECOs) or Entry Clearance Managers (ECMs) and to act as decision makers and quality assurers for visa applications.
- 8.12** Generally, overseas postings are for a period of two years with the option of a third year, subject to mutual agreement and there being a business need for the staff member to stay at that post. Staff remain Home Office employees, on Home Office Terms and Conditions of employment, which may vary depending on the post.
- 8.13** Inspectors were told that where a post was closing as a result of network consolidation and the planned closure date was prior to the agreed end date of someone’s posting the member of staff was given the option of:
- returning to the UK when the visa section closed (‘short-touring’)
 - taking up an alternative posting at another overseas visa post (‘cross-touring’)
- 8.14** Where the planned closure fell shortly after the date a member of staff was due to complete their posting they might be offered a short-term extension to ensure the post had enough staff right up to the point of closure.
- 8.15** In March 2019, inspectors spoke to UK-based staff in Warsaw (due to close in December 2019) and in Manila (due to close by April 2021). They told inspectors that they understood their

options and had no particular concerns about the exact timing of the closures, other than needing sufficient time to organise their next career move.

Locally-engaged staff

- 8.16** Most overseas visa sections employ a number of locally-based staff. These may be foreign nationals or British citizens living locally. Some are spouses of Embassy staff. Most are employed in administrative roles, logging visa applications, using their language skills and local knowledge to carry out checks on the evidence provided in support of an application, and preparing the case for decision makers. Some may be ECO decision makers.
- 8.17** Generally, locally-engaged staff have a contract of employment with the Embassy. In Warsaw and in Manila, locally-engaged staff told inspectors they were unclear about what would happen when the DMCs closed and were concerned about the termination of their contracts and any payments, such as an end of contract ‘bonus’. They had been informed by both the Home Office and the FCO that they would be entitled, as a minimum, to payments in line with local labour laws. However, they told inspectors repeatedly that they would like much more information about their impending ‘redundancy’, so that they could make decisions about their futures. They would like to have some illustrations of the payments they might receive or even a ‘ready reckoner’.
- 8.18** Locally-engaged staff understood it was not possible to be told a precise date for closure so far in advance, but they were looking for more engagement from the Home Office and FCO. For example, they would like to know if there will be a gradual tapering off of the work or a sudden stop.
- 8.19** Home Office managers told inspectors that the closures were too far in the future for such details to have been decided. They also told inspectors that a number of measures were in place to advise locally-engaged staff. In Warsaw, these included the creation of a staff consultation forum and the promise to discuss matters in greater detail nearer the closure date, including providing clarity about any ‘incentive’ payments. However, the managers explained that as the staff are employed by the FCO, it will fall to FCO Corporate Services to administer the redundancy terms and conditions on behalf of the Home Office.
- 8.20** Inspectors were also informed of efforts by the Home Office and the FCO to provide staff with work experience, training, mentoring and support to make them better equipped when they begin applying for new jobs. And, in Warsaw, an internal rule preventing locally-engaged staff from applying for any jobs elsewhere in the Embassy until they had completed at least 12 months’ work in the visa section had been relaxed and staff had been encouraged to apply for other Embassy jobs.

Residual work

- 8.21** Staff in the visa sections at Warsaw and Manila told inspectors that they had not been informed whether any visa-related work would remain at post after the DMC closed, such as printing vignettes,⁵¹ handling enquiries, verifying evidence submitted by applicants, or liaising with the commercial partner running the Visa Application Centre(s) (VACs).
- 8.22** V&C management told inspectors it was not able to inform staff about such things as the closures were still some time off. It might be possible for vignette printing, for example, to

51 A vignette is a visa that is stuck into a passport.

be done by the commercial partner, but this would depend on the Home Office being able to assure itself that this could be done securely.

FCO and staff from other government departments

8.23 The October 2018 Options Paper referred to the Home Office's engagement with other government departments (OGDs) regarding its network consolidation plans. It noted:

"We have engaged with cross Whitehall stakeholders, particularly FCO, through the Cross Whitehall Operational Visa Delivery Working Group; the Network Steering Group; the International Estates and Security Board and through bilateral discussions. All have stressed the importance of giving sufficient notice for any proposed changes and emphasised that it is critical – for both customers, and bilateral relations – that onshoring work delivers at least the same, but preferably an improved, level of service to customers."

8.24 The FCO told inspectors it recognised that, as a result of improving technology and onshoring, the UKVI requirement for space and facilities across the FCO estate was changing. However, where the FCO was making changes to its estate, for example in Beijing, and needed clarity and certainty from UKVI about its plans and requirements, this had proved difficult and slow.

8.25 Meanwhile, at post in Warsaw and in Manila, in interviews with inspectors, FCO and OGD staff said they felt there had been minimal consultation from the Home Office about the decision to close the DMC, and about timing and implementation. At both posts, the FCO Head of Mission told inspectors that they were informed of the final decision to close the DMC only a day or two before an announcement was made to staff, which one described as "information rather than consultation".

8.26 This view was echoed by a number of other Heads and Deputy Heads of Mission who responded to ICIBI's 'call for evidence' for this inspection. Typical of these responses, one wrote:

"The email announcing the closure of the [Location] office is a good example; there was no prior consultation, and there has been no follow up with us by UKVI, certainly not at regional level, to explore the impact of this change on our teams. Locally in [Location], we know that the team is preparing some communications for Embassies in the region for the closure of the UKVI office there, but I only know this because we have a consular regional operations manager there. I have seen no communications from UKVI, nor have I been contacted or consulted about the impact of the change."

8.27 In Manila, inspectors were told by FCO and Home Office staff that the announcement of the closure of the DMC was hurried because the decision had been disclosed unofficially to staff in Sheffield:

"There was no prior consultation on [the closure]. Indeed, UKVI's own regional managers were unaware the decision had been taken. Consequently, there was no realistic plan to communicate this to staff quickly – with the result that the news leaked out ... This meant that our excellent (but relatively junior) Visa Hub Manager had to break the news to all visa staff at little notice."

8.28 This raised questions about the extent to which the Consolidation Board and UKVI (V&C) senior managers were in control of the dissemination of such important and sensitive news.

- 8.29** Representatives of other departments and agencies based at the Warsaw and Manila Embassies, such as Department for International Trade (DIT) and the National Crime Agency (NCA), told inspectors that while they had not been informed in advance they were less affected by the DMC closures and although they would miss being able to speak directly to Home Office staff if they had queries they did not believe it would greatly impact their core business.

Commercial partners

- 8.30** In most cases, the only people an applicant will meet face-to-face during the visa application process are VAC employees. The latter may be challenged by applicants to explain any delays or refusals, and where the Home Office requires to examine or issue physical documents it is the VAC that has to receive and pass them on. In that respect, onshoring could be seen as leaving a VAC without the support of a local or regional DMC, particularly where the time zone is significantly different from the UK.
- 8.31** The October 2018 Options Paper recognised the importance of V&C's relationships with the VAC providers and the need to encourage them to improve and develop their services so that the same range of services were available in all locations and so that V&C staff were freed up from non-decision-making work. In this context, the Options Paper referred to the piloting of commercial partner remote printing (of vignette visas), and inspectors were told that V&C and the commercial partners had been working closely on process mapping and on creating IT solutions that reduce the requirement for physical documents to be couriered between them.

Communication with stakeholders

- 8.32** Inspectors interviewed a number of stakeholder groups in the UK, including stakeholders from the tourism, business and student sectors, to seek their views on the onshoring of visa decision making and the extent to which the Home Office had consulted them about its Network Consolidation Programme. Stakeholders were also invited to make written submissions via a public 'call for evidence' posted on the ICIBI website.

Tourism and business sectors

- 8.33** The October 2018 Options Paper made no specific reference to tourism, but under "Trade/prosperity" it acknowledged that V&C's "ability to continue to deliver a first-rate service, particularly for visitors, will be a global priority". This meant at least maintaining, but ideally improving, what customers required "whether in terms of turnaround time, reach, or other factors", and was particularly important in sensitive, high volume markets and also in emerging markets.
- 8.34** A key tourism stakeholder group told inspectors that it understood the Home Office's aim of achieving greater consistency in the service it offered by using technology to onshore more decision making. However, it had a number of concerns about service levels, for example whole travel groups had been prevented from travelling because visas had been issued with the wrong dates, with applicants having to reapply and pay again despite not having been responsible for the error. Similarly, 'high-end clients' applying via premium routes had not received visas in time.
- 8.35** The stakeholder group believed that the Home Office was failing to take opportunities to secure the UK's "market share" of tourist and business visitors, for example it had not pursued

its promise to look at a standard ten-year visa, which would attract more Chinese visitors. Also, youth travel to the UK was growing at a slower rate than to Ireland and Australia, which had consequences for future revenue.

- 8.36** Another stakeholder who dealt mainly with ‘Blue Chip’ corporate clients told inspectors that their clients, whom the Home Office regarded as low risk, had not seen any difference in service levels when decision making had been onshored beyond a “bit of a blip” with processing times in the summer of 2017. However, the stakeholder had noticed some impact on processing times for certain applications, for example Priority Spouse/Dependant were taking six weeks where previously they had taken three, and no longer had the working level points of contact to approach if something went wrong with an application.
- 8.37** According to this stakeholder, the Blue Chip view is generally that the UK has the best visa system in the world, since it is “more consistent, less uncertain and more predictable than other countries”, although it is expensive. To the extent that its clients were dissatisfied it is with visa policy and requirements, not with the service they received. The service provided by the VACs was a different matter and this varied considerably by location, in terms of the availability of appointments, waiting times even with an appointment, and levels of advice available.
- 8.38** The same stakeholder commented that the Home Office had “generally struggled” with its communications about DMC closures and posts had been closed without stakeholders being told in advance. However, the most recent closure, of the New York DMC (in October 2018) had been a welcome change, with events held at the Consulate and engagement with business and industry.

Tier 4 students – rebuilding damaged confidence

- 8.39** The problems experienced by the Sheffield DMC in Spring and Summer 2017 delayed the issuing of visas to large numbers of applicants. Because of the time of year, many of those affected were applicants for PBS Tier 4 Student Visas and the delays meant that some missed the start of their courses in the UK.
- 8.40** Embassies informed inspectors that they received unprecedented levels of enquires and complaints from the students and their families concerned about the time it was taking to process their applications.
- 8.41** Confidence in the visa system was damaged, not just that of individual applicants but also of educational establishments sponsoring their courses and of the sector as a whole. Other government departments, particularly the FCO, who had worked hard to promote the UK as “a great place to study” suffered reputational damage as a result of the delays, and this was reflected in the ‘call for evidence’ responses received from Heads and Deputy Heads of Mission.
- 8.42** UKVI (V&C) management told inspectors that it was well aware of these issues as it entered the student visa application surge period in 2018 and had concentrated effort and resources on ensuring that the problems of 2017 were not repeated. In 2018, student visa applications were processed within the 15-day Customer Service Standards (CSS) and both V&C and the FCO told inspectors they believed that confidence in the UK’s student visa system was returning.
- 8.43** A key stakeholder for the student sector told inspectors that when Tier 4 decision making had been onshored to Sheffield there had been a noticeable change in both application processing

times and decision quality, with more applications challenged on credibility grounds and an increase in British Residence Permits (BRPs) issued containing errors. Refusals on credibility grounds was the stakeholder's biggest frustration, since decision makers generally lacked the knowledge and expertise to make an informed judgement about an applicant's academic choices, while refusals went against the sponsoring institution and could result in it having its sponsor licence withdrawn.

- 8.44** The stakeholder confirmed that there had been an improvement in 2018, particularly in processing times. However, they were concerned about what impact any future onshoring would have as it appeared that Sheffield was operating at capacity.
- 8.45** The stakeholder believed that onshoring had affected day-to-day contact between educational institutions and UKVI, creating new barriers. According to the stakeholder, information about processing delays and onshoring plans was communicated to universities only if they signed up to be a Home Office Premium Sponsor, at an annual cost of £8,000. Having signed up, the university is allocated an Account Manager, who can provide updates and advice on applications and other matters.
- 8.46** 8.46. The stakeholder believed this system effectively penalised smaller institutions or those with few international students, who had not signed up as the fee did not represent value for money. This was accentuated as UKVI had been encouraging Premium Sponsors to use their Account Managers to try to correct errors rather than have the applicant submit an Administrative Review application.

Public 'call for evidence'

- 8.47** ICIBI posted a public call for evidence on its website on 12 February 2019, inviting submissions about the customer experience of network consolidation and the onshoring of visa decision making to the UK.
- 8.48** Eleven written submissions were received, from universities, NGOs, immigration advisers, a firm of solicitors and one member of the public. Eight of the submissions expressed essentially negative views about the Home Office's handling of visa applications and network consolidation, while the remaining three made both negative and positive points. Five provided specific examples or case studies, and one included a series of recommendations.
- 8.49** In relation to onshoring, the negative views included:
- "One concern of "onshoring" is a lack of understanding of local processes, ... if there is this lack of understanding, we are concerned that caseworkers are more likely going to refuse applications if they are not satisfied with the type of supporting document, not being aware that these types of documents ... are common and might differ from what staff are used to from British documents."
 - "Perhaps one of the most frustrating aspects of the decision-making process since 'onshoring' commenced, is the fact that the officer conducting the Administrative Review, whilst acknowledging the original visa refusal decision was wrong, then finds another reason to refuse the application at Administrative Review stage."
 - "Before and after onshoring, when there is a delay in decision making (where it goes beyond the published service target, i.e., 15 working days for standard application, 3-5 working days for priority application, and 1 working day for super priority application), the V&C is supposed to write/email the student to let them know but this has been

sporadic in practice. Worse still, when there are genuine delays perhaps due to the amount of visa applications to be processed and students are notified, the standard letter refers to the fact that the student's case might not be straight forward, hence causing panic, rather than admitting to the fact that the V&C is unable to meet the service target due to the workload."

- "There were and are ongoing issues with decisions made in Sheffield not being received/processed by the Entry clearance posts. As a result, students are left in the lurch not knowing what's happening with their visa application. Quite a few students contacted us for help due to the lack of communication from the V&C after submitting their visa application. When we contacted our Education Account Manager in the V&C, we found that often, a decision had been made but not transmitted to overseas post or not processed by overseas post."
- "Since the 'onshoring' of decision making in relation to Tier 4, we have noted a number of issues with both the quality of decision making and the logic applied during it."

8.50 The submissions identified other problems with Tier 4 Student visas, but also some signs of improvement:

- "This year we still had quite a number of Tier 4 pilot students (35 in the last 5 months) who were given incorrect length of leave."
- "There is a lack of consistency in how 'processing time' is calculated. There isn't clear information in the public domain that the 'processing time' refers to the time from the date the student attended their in-person appointment, to the date a decision is made. In reality, there are lead times from the 'date of application' to 'date of appointment', and quite often a few days of delay from 'date of decision' to 'date the student receives their passport'. It would be helpful to clarify this in government webpage so that visa applicants understand the real amount of time it takes from end to end."
- "There are issues with students not receiving emails when caseworker requires further information. We have had a few cases where the caseworker has sent an email to request further information, but the student hasn't received it ... If it is a known problem then specific country guidance should be updated to reflect this."
- "Where we have intervened with the Premium Customer Service Team and requested a decision is expedited, often the decision has been expedited but the student still has to wait a long time for their passport to be returned, which negates the benefits of expediting an application."
- "Whilst the situation has improved significantly, there is still a considerable delay for a student to receive their passport back following a successful administrative review. This has meant, in a few cases, students have missed the beginning of term through no fault of their own."
- "There were some scanning issues during the last academic year, but far fewer than the previous year."
- "There also appeared to be a number of issues with scanning documents and the VAC telling students that certain mandatory documents were not necessary. It was positive to see V&C giving students the benefit of the doubt following refusals on this basis, and granting leave."

8.51 Meanwhile, some wider issues were also noted:

- “Poor quality drafting is common. We have seen decision notices that have incorrectly set out the applicant’s name and home country. We also have experience of an applicant who was sent a blank refusal template. Of more concern is when caseworkers have not read or misquoted supporting documents such as a business plan. When a decision is based on an interview with an applicant, this problem is magnified. In some cases the caseworker has incorrectly interpreted their own interview notes, but the interview notes were not received in time.”
- “Lack of clarity as to how to apply and what to include.”
- “Inappropriate and dysfunctional online systems.”
- “Significant delays in processing.”
- “Unreasonable information requirements.”
- “There is one aspect of this system that causes a lot of difficulties for immigration practitioners. The procedure for where to post supporting documents for entry clearance settlement applications varies depending on which country you are applying from. In some countries the applicant brings the supporting documents to the biometrics appointment and in some countries the applicant sends the supporting documents to Sheffield. Unfortunately, this information is not published by the Home Office. It is often not published by its commercial partners, VFS and TLS, either. Those websites are unhelpful and they often contain contradictory information.”

8.52 More positively:

- “On the whole, the UK’s visa application process for overseas applicants has become more efficient in recent years. However, in our and our client’s experience, there can still be occasions when it is extremely difficult for applicants to navigate the system.”

FCO ‘call for evidence’

8.53 In January 2019, the ICI wrote to all FCO Heads and Deputy Heads of Mission seeking their views on UKVI’s handling of network consolidation and asking, in particular, about:

- whether UKVI engages effectively with the FCO/posts when considering the closure of an overseas visa section
- what consideration, if any, it gives to any representations or submissions from the FCO/posts, including in relation to the potential reputational damage to the UK that may arise from closing a visa section
- where a visa section has already been ‘onshored’, what impact it has had on visa and immigration business delivery and on relationships in the country concerned

8.54 Twenty-six written submissions were received, 14 of which were essentially negative, nine contained both positive and negative points, and three were essentially positive. Fifteen of the submissions contained specific examples or case studies, while ten contained recommendations for improvements.

8.55 A number of the respondents complained about the limited consultation regarding the decision to onshore:

- “No consultation on the central decision to downsize but there was consultation on some aspects of how it might be implemented.”
- “V&C appear to give no or little consideration to any representations or submission from the FCO. Consult on communication and handling but not on strategic direction.”
- “No engagement with the FCO from V&C when considering the closure of an overseas visa section. Instead post was presented with a decision.”
- “Overall none of the representations made by the FCO at post appeared to make any difference. None of their concerns were addressed nor have they any work-arounds such as being able to issue ourselves in extremis.”
- “Post was disappointed that V&Cs predisposition was to close services without putting satisfactory alternatives in place.”

8.56 Others focused on the impact on the FCO’s workload and resources:

- “Whilst decision making has been hubbed there are some critical functions left at posts. These posts continue to receive visa queries from applicants ... The staffing of posts which act as an intermediary are at clerical level and they are unable to deal with applicants effectively. Staff have been orphaned by V&C as they have no day to day oversight and the FCO have had to step in ... In some cases the applicants resort to contacting the head of mission of the FCO out of hours Global Response Centre as they cannot communicate with the post. One example cited was on Christmas day.”
- “Two sources of tension; there was an expectation of FCO resource being used as a backstop or to carry out some basic due diligence functions previously done by V&C staff and the second was the changes to the physical estate where the V&C departure had the potential to leave the FCO with significant over capacity in an expensive real estate rental market.”
- “V&C move resulted in wasted office space. No engagement from V&C with regards to this until pushed by post. Post considered V&C neglected one HMG commitment. HMG Change request form not completed by V&C for over three years however should have been completed and submitted at time of staff/operational changes.”
- “Time spent on visa work diverts effort from other important business.”
- “Interventions had to be made by the Head or Deputy Head of Mission in a number of cases.”
- “The way the UK manages visa services is post’s biggest problem to manage. The time spent on this is increasing not decreasing.”

8.57 The quality of the service provided by the Home Office was a particular concern and especially its effect on the UK’s reputation and wider interests:

- “As a result of an expensive and unfriendly visa system, we lose out on trade and potential students. Even government sponsored students (Chevening) have to go through the same process! There must, surely, be a better way of doing this and putting the ‘service’ back into the Visa Service.”
- “As visa hubs consolidate into regions the process has become more difficult and cumbersome.”

- “Counter intuitive to Government policy on a ‘Britain open for business’.”
- “We consequently worry about damage to the UK brand through ‘onshoring’ this service. Notwithstanding the probable cost savings, it makes an already-inconvenient visa application process longer, and more impersonal and remote. It bars the opportunity for applicant’s helpful interaction with Entry Clearance Assistants at posts, when guidance can be difficult to understand. It can also be expensive to go to the UK at short notice given the fee for an ‘expedited’ application. Further, ‘onshoring’ renders it difficult for an official deciding on a visa application to cultivate relationships with relevant local authorities and partners to understand the relevance, validity and limitations of documents supporting visa applications.”
- “Post also feels that V&C did not think through or propose effective mitigation of the reputational damage”.
- “One of the slowest services for dealing with official visa requests which reflects unfavourably on the UK.”
- “Ability to respond to last minute requests is limited.”
- “Ambassadors end up having to shoulder the repercussions and this post’s Ambassador has spent many hours trying to resolve visa issues.”
- “Onshoring has increased delays and made it more difficult for visa applicants to have a human interface when things get delayed or wrong.”
- “Whilst post has some contact points within the visa team in Croydon they are not always able to escalate urgent issues to either the regular or in-country processing teams and no provision for addressing issues out of hours.”
- “Distance from the hub means that decisions are taken without understanding the local context. This will be more difficult to manage when on-shored.”

8.58 Some raised doubts about the Home Office’s planning and execution of onshoring:

- “... no confidence (and this is shared by the V&C colleagues here) that the UK will be ready, robust or resilient enough to deal with permanent onshoring from this network. There will be platitudes about how a programme is in place to ensure a smooth transition but those same platitudes were tolled out before this temporary onshoring. If the permanent onshoring is as disastrous as this trial run then it will have severe implications for the UK economy.”
- “... the experience of recent consolidation and work being done elsewhere has not been encouraging. Emerging problems have been less visible to the network, until they started to hit us reputationally. It appears the end-to-end visa decision making process is now more fragmented, so that when things go wrong, service recovery is more complex and can take longer to resolve, to the detriment of the customer. The more serious service problems faced over the past three months invariably – though not exclusively – relate to cases ‘consolidated’ to the UK ... it is essential that this further consolidation is seen to be successful and sustainable before further consolidation is considered.”
- “Concerned that with the plan to move things back to Sheffield that unless planned very carefully this could lead to a drop in service standards.”
- “Croydon had to ramp up staffing to handle new volumes which came with some teething problems.”
- “V&C cost benefit analysis appears to be in closed-loop.”

- “Biggest bump occurred in the summer of 2017 as V&C decided to move tier 4 applicants to Sheffield. Described by post as an unmitigated disaster. The preparation was extremely poor and the reputational hit was significant.”

8.59 However, there were also endorsements for onshoring, as well as for engagement with V&C staff:

- “Online application is relatively straightforward and a step in the right direction.”
- “Overall, there are advantages to taking visa decisions in the UK. There are excellent, reliable and responsive staff in the UK who communicate well with Embassies. However, consultation with the Embassy and stakeholder communication from local and regional offices can be poor.”
- “Having V&C expertise at post able to advise on visa policy and process, as well as check status updates on visa applications, has been invaluable and helped to mitigate against the fact that the actual visas are processed elsewhere, a point that is still a minor bilateral irritant.”
- “Positive relationship with V&C staff locally.”
- “Communication between the Embassy and the V&C team in the UK is good.”

All Party Parliamentary Groups

- 8.60** At the same time as this inspection was gathering its evidence, a number of All Party Parliamentary Groups (APPGs) with a particular interest in Africa were conducting their own inquiries into the Home Office’s handling of visas from African applicants, including the impacts of network consolidation.
- 8.61** The APPGs had a number of concerns about the “irrational and biased decision making”, in particular “prejudice and unjustified assumptions” shown by decision makers regarding whether an applicant was a “genuine visitor” and in relation to whether an applicant has sufficient income and funds to cover the costs of their visit, even where UK sponsors have indicated that they will meet all of the costs.
- 8.62** The extent and nature of the supporting evidence the Home Office requires African applicants to provide was variously described as “questionable”, “unreasonable”, “demeaning” and “highly offensive”. It was also unclear what evidence the Home Office required for an application to succeed and there was no opportunity for applicants to supply additional information once an application had been made.
- 8.63** In relation to network consolidation, the APPGs noted the scaling down and closure of DMCs in Africa, with only one (Pretoria) remaining from 2019 and with applications from VACs across Africa dealt with either there or at the Croydon DMC. This raised concerns about decisions being made “far away from local expertise, context and insight [from High Commissions or Embassies]”. Meanwhile, the practicalities for many applicants in reaching the nearest VAC made the process time-consuming, costly, and, in some cases, unsafe as applicants had to travel hundreds of miles and cross into different countries.
- 8.64** The APPG Africa took evidence from the Immigration Minister and the Home Office (UKVI), which included an update on the latter’s network consolidation plans. It also met with the Independent Chief Inspector (ICI), and its report reflects a number of points from previous

inspections, including concerns about the resourcing of the Croydon DMC and the extent of decision makers' reliance on the Streaming Tool.

- 8.65** Based on these previous inspections and the current one, the ICI was not able to satisfy the APPG's interest in establishing whether decision making in respect of visa applications from African nationals was balanced and fair but undertook to look at the handling of Visitor Visas at the Croydon and Pretoria DMCs.

Annex A

DMC closures since 2008

Post Name	Country	Closure date
Kigali	Rwanda	2008 January
Lisbon	Portugal	2008 January
Kinshasa	DRC	2008 January
Georgetown	Guyana	2008 February
Jerusalem	Israel	2008 February
Kathmandu	Nepal	2008 February
Bratislava	Slovak Republic	2008 February
Tallinn	Estonia	2008 March
Valetta	Malta	2008 March
Vienna	Austria	2008 March
Brussels	Belgium	2008 April
Prague	Czech Republic	2008 April
Tel Aviv	Israel	2008 May
Riga	Latvia	2008 May
Budapest	Hungary	2008 June
Sofia	Bulgaria	2008 August
Zagreb	Croatia	2008 October
Luanda	Angola	2008 December
Abidjan	Côte d'Ivoire	2009 January
Asmara	Eritrea	2009 January
Banjul	The Gambia	2009 January
Dakar	Senegal	2009 January
Dar es Salaam	Tanzania	2009 January
Kampala	Uganda	2009 January
Yaoundé	Cameroon	2009 January
Seoul	South Korea	2009 January
Helsinki	Finland	2009 January

Post Name	Country	Closure date
Singapore	Singapore	2009 February
Oslo	Norway	2009 March
Athens	Greece	2009 May
Dubai	UAE	2009 September
Taipei	Taiwan	2009 October
Bucharest	Romania	2010 February
Copenhagen	Denmark	2010 May
Reykjavik	Iceland	2010 June
Chongqing	China	2010 July
Sana'a	Yemen	2010 September
Lusaka	Zambia	2010 October
Chicago	USA	2010 October
Geneva	Switzerland	2010 October
Tbilisi	Georgia	2010 December
Addis Ababa	Ethiopia	2011 January
Amsterdam	Netherlands	2011 March
Dusseldorf	Germany	2011 April
Los Angeles	USA	2011 May
Chisinau	Moldova	2011 August
Sarajevo	Bosnia and Herzegovina	2011 August
Ottawa	Canada	2011 October
Kuala Lumpur	Malaysia	2011 October
Tehran	Iran	2011 November
Jakarta	Indonesia	2011 December
Skopje	Rep of Macedonia	2012 January
Port Moresby	Papua New Guinea	2012 March
Suva	Fiji	2012 March
Dublin	Rep of Ireland	2012 May
Almaty	Kazakhstan	2012 December
Colombo	Sri Lanka	2013 February
Baghdad	Iraq	2013 March
Stockholm	Sweden	2013 April
Ashgabat	Turkmenistan	2013 July
Hanoi	Vietnam	2013 August

Post Name	Country	Closure date
Tirana	Albania	2014 March
Tashkent	Uzbekistan	2014 March
Belgrade	Serbia	2014 March
Minsk	Belarus	2014 March
Nicosia	Cyprus	2014 March
Baku	Azerbaijan	2014 April
Madrid	Spain	2014 June
Rabat	Morocco	2014 June
Yerevan	Armenia	2014 June
Tripoli	Libya	2014 July
Freetown	Sierra Leone	2014 August
Beirut	Lebanon	2014 August
Rome	Italy	2014 August
Rangoon	Burma	2014 September
Doha	Qatar	2014 September
Muscat	Oman	2014 September
Kingston	Jamaica	2014 October
Kyiv	Ukraine	2014 December
Rio de Janeiro	Brazil	2015 February
Tokyo	Japan	2015 April
Islamabad	Pakistan	2015 April
Havana	Cuba	2015 May
Mumbai	India	2015 September
Dhaka	Bangladesh	2015 September
Canberra	Australia	2015 December
Shanghai	China	2016 January
Paris	France	2016 January
Port of Spain	Trinidad and Tobago	2016 March
Khartoum	Sudan	2016 April
Accra	Ghana	2016 May
Kuwait City	Kuwait	2016 October
Abuja	Nigeria	2016 December
Lagos	Nigeria	2016 December
Nairobi	Kenya	2017 February

Post Name	Country	Closure date
Guangzhou	China	2017 February
Cairo	Egypt	2017 March
Algiers	Algeria	2017 September
Moscow	Russia	2018 April
Bangkok	Thailand	2018 July
New York	USA	2018 October
Bogota	Colombia	2019 April

Annex B

Applications assessed at the Sheffield, Croydon, Manila and Warsaw DMCs⁵²

DMC	Visa category	Originating country	Since
Sheffield	Tier 1,2,4 and 5, EEA and Settlement	Albania	April 2017
		Algeria	August 2017
		Angola	March 2019
		Argentina	January 2018
		Armenia	February 2019
		Australia	January 2017 (bar Tier 4) & February 2019 (Tier 4)
		Austria	January 2019
		Azerbaijan	June 2017
		Bahamas	February 2018
		Bahrain	January 2019
		Bangladesh	April 2017
		Barbados	February 2018
		Belarus	December 2016
		Belgium	July 2017
		Bermuda	February 2018
		Bhutan	April 2017
		Bolivia	January 2018
		Bosnia and Herzegovina	January 2019
		Botswana	March 2019
		Brazil	January 2018
		Brunei	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Bulgaria	January 2019

⁵² Work is rerouted ahead of a DMC final closure, so some dates may not match other DMC closure tables.

DMC	Visa category	Originating country	Since
		Cambodia	March 2015
		Cameroon	March 2015
		Canada	April 2018
		Cayman Islands	February 2018
		Chile	January 2018
		China	March 2017 (bar Tier 4) & February 2019 (Tier 4)
		Colombia	January 2018
		Côte d'Ivoire	March 2015
		Croatia	January 2019
		Cuba	February 2018
		Cyprus	May 2017 (North) & February 2019 (South)
		Czech Republic	January 2019
		Democratic Republic of Congo	March 2019
		Denmark	February 2019
		Dominican Republic	February 2018
		Ecuador	January 2018
		Egypt	February 2017
		Estonia	February 2019
		Ethiopia	March 2019
		Falkland Islands	September 2018
		Fiji	February 2017 (bar Tier 4) & February 2019 (Tier 4)
		Finland	February 2019
		France	October 2016
		Georgia	May 2017
		Germany	January 2017
		Ghana	March 2015
		Greece	January 2019
		Guatemala	April 2018
		Hong Kong	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Hungary	January 2019

DMC	Visa category	Originating country	Since
		Iceland	February 2019
		India	November 2016 (bar Tier 2 and Tier 4) March 2018 (Tier 2) & February 2019 (Tier 4)
		Indonesia	December 2016 (bar Tier 4) & February 2019 (Tier 4)
		Iraq	April 2018
		Ireland	February 2017
		Israel	June 2017
		Italy	March 2017
		Jamaica	February 2018
		Japan	March 2017 (bar Tier 4) & February 2019 (Tier 4)
		Jordan	May 2017
		Kazakhstan	July 2017
		Kenya	March 2019
		Kosovo	January 2019
		Kuwait	August 2016
		Kyrgyzstan	June 2017
		Laos	July 2017
		Latvia	January 2019
		Lebanon	May 2017
		Lithuania	January 2019
		Madagascar	March 2019
		Malawi	March 2019
		Malaysia	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Malta	February 2019
		Mauritius	March 2019
		Mexico	January 2018
		Moldova	January 2019
		Mongolia	April 2017 (bar Tier 4) and February 2019 (Tier 4)
		Montenegro	January 2019
		Morocco	April 2016

DMC	Visa category	Originating country	Since
		Mozambique	March 2019
		Myanmar	May 2017
		Namibia	March 2019
		Nepal	April 2017
		Netherlands	December 2017
		New Zealand	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Nigeria	July 2016
		North Macedonia	January 2019
		Norway	February 2019
		Oman	January 2019
		OPT	July 2015
		Pakistan	July 2015
		Panama	January 2018
		Papua New Guinea	February 2017 (bar Tier 4) & February 2019 (Tier 4)
		Peru	January 2018
		Philippines	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Poland	January 2019
		Portugal	February 2019
		Qatar	June 2017
		Romania	January 2019
		Russia	September 2016
		Rwanda	March 2019
		Saudi Arabia	January 2019
		Senegal	March 2015
		Serbia	May 2017
		Sierra Leone	March 2015
		Singapore	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Slovenia	January 2019
		South Africa	March 2019
		South Korea	March 2017 (bar Tier 4) & February 2019 (Tier 4)

DMC	Visa category	Originating country	Since
		Spain	January 2017
		Sri Lanka	December 2016
		St Lucia	February 2018
		Sweden	February 2019
		Switzerland	January 2017
		Taiwan	April 2017 (bar Tier 4) & February 2019 (Tier 4)
		Tajikistan	June 2017
		Tanzania	March 2019
		Thailand	April 2017
		The Gambia	March 2015
		Trinidad & Tobago	February 2018
		Tunisia	October 2015
		Turkey	April 2017
		Turkmenistan	May 2017
		Uganda	March 2019
		Ukraine	April 2017
		United Arab Emirates	January 2019
		USA	September 2018
		Uzbekistan	May 2017
		Venezuela	January 2018
		Vietnam	May 2017
		Zambia	March 2019
		Zimbabwe	March 2019
Croydon	Visitor & Other Non-Settlement	Algeria	November 2016
		Argentina	March 2019
		Armenia	June 2014
		Bahamas	July 2018
		Barbados	July 2018
		Belgium	September 2016
		Bermuda	July 2018
		Bolivia	March 2019
		Brazil	March 2019
		Cameroon	January 2019

DMC	Visa category	Originating country	Since
		Canada	April 2018
		Cayman Islands	July 2018
		Chile	March 2019
		Colombia	March 2019
		Côte d'Ivoire	January 2019
		Cuba	July 2018
		Cyprus (South)	March 2012
		Denmark	March 2012
		Dominican Republic	July 2018
		Ecuador	March 2019
		Estonia	March 2012
		Falkland Islands	September 2018
		Finland	December 2012
		France	September 2016
		Germany	March 2011
		Ghana	March 2015
		Guatemala	March 2019
		Guyana	July 2018
		Iceland	March 2014
		Ireland	March 2012
		Italy	December 2012
		Jamaica	July 2018
		Kuwait	October 2018
		Malta	March 2012
		Mexico	March 2019
		Morocco	November 2018
		Netherlands	March 2011
		Nigeria	January 2019
		Norway	March 2012
		Panama	March 2019
		Peru	March 2019
		Portugal	March 2014
		Qatar	October 2018
		Russia	April 2018

DMC	Visa category	Originating country	Since
		Senegal	January 2019
		Sierra Leone	January 2019
		Spain	March 2014
		St Lucia	July 2018
		Sweden	December 2012
		Switzerland	September 2016
		The Gambia	January 2019
		Trinidad & Tobago	July 2018
		Tunisia	November 2016
		USA	September 2018
		Venezuela	March 2019
Croydon	Tier 1,2,4 and 5, EEA, Settlement and visitors	Gibraltar	March 2012
Manila	Visitor & other Non-Settlement	Australia	December 2015
		Brunei	2010
		Fiji	March 2012
		Hong Kong	2010
		Indonesia	2015
		Japan	April 2015
		Malaysia	October 2011
		Mongolia	2014
		New Zealand	December 2015
		Papua New Guinea	March 2012
		Philippines	Since opening
		Singapore	February 2009
		South Korea	January 2019
		Taiwan	October 2009
Warsaw	Visitor & other Non-Settlement	Albania	March 2013
		Austria	March 2014
		Belarus	March 2013
		Bosnia & Herzegovina	March 2012
		Bulgaria	March 2014

DMC	Visa category	Originating country	Since
		Croatia	March 2014
		Czech Republic	April 2008
		Greece	March 2011
		Hungary	March 2012
		Kosovo	March 2014
		Latvia	March 2012
		Lithuania	April 2011
		Moldova	March 2014
		Montenegro	December 2012
		North Macedonia	January 2012
		Poland	Since opening
		Romania	March 2012
		Serbia	March 2013
		Slovenia	March 2014
		Ukraine	March 2016

Annex C

Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on her behalf.

The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions. However, functions exercised at removal centres, short-term holding facilities and under escort arrangements are excepted insofar as these are subject to inspection by Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (and equivalents in Scotland and Northern Ireland).

The legislation directs the Independent Chief Inspector to consider and make recommendations about, in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on section 19D of the Race Relations Act 1976 (c. 74) (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to her in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which she has committed to do within eight weeks of receipt, subject to both Houses of Parliament being in session.

Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

Annex D

ICIBI's 'expectations' of asylum, immigration, nationality and customs functions

Background and explanatory documents are easy to understand and use (e.g. statements of intent (both ministerial and managerial), impact assessments, legislation, policies, guidance, instructions, strategies, business plans, intranet and [GOV.UK](https://www.gov.uk) pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

Decisions and actions are 'right first time'

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent

- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

Errors are identified, acknowledged and promptly 'put right'

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

Each immigration, asylum, nationality or customs function has a Home Office (Borders, Immigration and Citizenship System) 'owner'

- The BICS 'owner' is accountable for
- implementation of relevant policies and processes
- performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
- resourcing (including workforce planning and capability development, including knowledge and information management)
- managing risks (including maintaining a Risk Register)
- communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
- effective monitoring and management of relevant contracted out services
- stakeholder engagement (including customers, applicants, claimants and their representatives)

Acknowledgements

The inspection team is grateful to the Home Office for their cooperation and assistance during the course of this inspection and appreciate the contributions from staff who participated. We are also grateful to the stakeholders who participated.

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