Independent Chief Inspector of Borders and Immigration

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Annual Report for the period 1 April 2019 to 31 March 2020

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Our purpose

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

All Independent Chief Inspector of Borders and Immigration inspection reports can be found at www.gov.uk/ICIBI

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Foreword

David Bolt, Independent Chief Inspector of Borders and Immigration

My primary objective for 2019-20 was to deliver a broadly based and balanced programme of inspections, covering as much of my published Inspection Plan as possible, through which I aimed to help the Home Office and others to improve the efficiency and effectiveness of the asylum, immigration, nationality and customs functions for which the Home Secretary is responsible.

I believe that this objective was largely met, notwithstanding continuing issues with the timely publication of inspection reports and with inspector numbers.

Between 1 April 2019 and 31 March 2020, twelve inspection reports were published. This compared with seven in 2018-19. While there is no ideal number, seven was too few and 12 is a better result.

However, these in-year figures do not take account of the fact that some reports continue to have an impact long after they are published. The 'Windrush Lessons Learned Review',[1] released in March 2020, contained a detailed case study of "Right to Rent", which included the findings and recommendations from ICIBI's inspection of the scheme (published in March 2018). It also referred to ICIBI's earlier (October 2016) report 'An inspection of the 'hostile environment' measures relating to driving licences and bank accounts'.

The fact that reports are readily accessible[2] and may be revisited much later makes it all the more important that ICIBI has rigorous processes for gathering and testing evidence and takes care to ensure that inspection reports are accurate and precise. Though hard to measure, I believe that the quality of ICIBI's reporting in 2019-20 remained high.

In reality, the headline figure for published reports does not give a true picture of 2019-20. Half of the twelve reports were published within the first six weeks of the business year, all of which had been sent to the Home Secretary in 2018-19, and another four were published in February 2020. Meanwhile, at the end of 2019-20, five completed reports were with the Home Secretary awaiting publication,[3] two of which had been submitted in July 2019.

I have written before about the effects of publishing a number of reports together, of long gaps where nothing is published, and on the currency of findings when publication is delayed. Of the reports published in April and May 2019, one was published after eight weeks, two after nine, and one each

1 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874022/6.5577_HO_Windrush_Lessons_Learned_Review_WEB_v2.pdf
2 https://www.gov.uk/government/organisations/independent-chief-inspector-of-borders-and-immigration
3 One of these, sent on 29 July 2019, was published on 29 April 2020 (39 weeks).

in weeks ten, 13 and 14. Since June 2019, the quickest publication time was 12 weeks, with the other reports taking 16, 19, 20, 21 and 28 weeks.

In January 2020, the Immigration Minister wrote to the Speaker of the House of Commons reiterating the previous ministerial commitment that the Home Office aims to lay reports before Parliament "within eight weeks of receipt where possible" and listing the six reports that were outstanding at that date. The Minister noted that there had been "approximately 15 weeks" when it had not been possible to lay reports before Parliament, due to pre-election and other recesses, but wrote that officials would arrange to lay the six reports as soon as possible. By 31 March 2020, four of the six had been laid. However, two further reports, submitted in January 2020, had missed the eight-week target.

I have laboured the point about delays for two main reasons. Firstly, they fuel the argument that the Independent Chief Inspector should have control over the publication of inspection reports, which was the case until 2014. In her 'Windrush Lessons Learned Review', Wendy Williams has recommended that: "The government should review the remit and role of the ICIBI, to include consideration of giving the ICIBI more powers with regard to publishing reports. Ministers should have a duty to publish clearly articulated and justified reasons when they do not agree to implement ICIBI recommendations."

The Home Office is not due to respond formally to the review for six months, and therefore any changes will affect my successor rather than me. Whatever future publication arrangements are agreed, I would strongly urge that the Home Office's written response to an inspection's findings and recommendations is published at the same time as the inspection report, as it is now, in order to avoid simply shifting the problem to the next stage of the process.

The second and more substantial reason is that delays undermine the impact and value of ICIBI's work. They affect its ability in near time to influence how the Home Office is operating, and also put at risk ICIBI's credibility with external stakeholders, on whom the Inspectorate relies for input into the inspection programme and individual inspections and in order to stay abreast of issues of concern to "customers" of the Home Office's Borders, Immigration and Citizenship System (BICS).

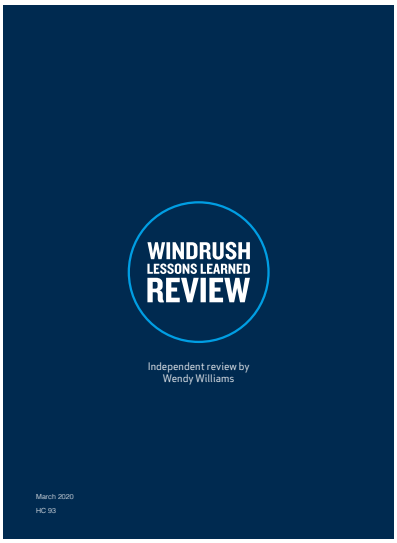
In principle, the Home Office can begin implementing recommendations it accepts as soon as it receives the final inspection report, or even earlier, since the recommendations are set out in the draft report sent to it for factual accuracy checking.[4] I have regularly pressed the department and ministers on this point, and they have all agreed that it would be in everyone's interest to do this.

But, while I am not privy to the clearance process reports go through, and while I have sometimes seen evidence of the Home Office having acted quickly, it often seems that there has been little, if any, movement before the formal response has been signed off by ministers, which is typically just before publication. The published responses reinforce this impression. I recognise that many areas are working at capacity, nonetheless I am frequently left feeling that the Home Office could go further and faster, and also that its acceptances of recommendations come with too many caveats and broad assurances rather than commitments to specific, time-bound actions.

More published reports in 2019-20 meant more recommendations (up from 33 in 2018-19 to 58). The number is not especially important, but the balance of "accepted", "partially accepted" and "not accepted" recommendations is relevant, given that ICIBI is not a regulator and has to rely on persuasion, using the force of the evidence it has gathered and the soundness of its analysis, conclusions, and recommendations. The balance in 2019-20 showed an improvement on the previous

4 The factual accuracy process normally takes two weeks, but can be longer, subject to negotiation. Reports are finalised and sent to the Home Secretary within a few days of ICIBI receiving the factual accuracy comments.

year. At 69% (40) “accepted”, 24% (14) “partially accepted”, and 7% (4) “not accepted”, compared with 48.5% (16), 48.5% (16) and 3% (1) in 2018-19, it almost returned to 2017-18 levels of 72%, 23% and 5%.



The ‘Windrush Lessons Learned Review’ by Wendy Williams

However, accepting a recommendation is not the same as implementing it. In her Windrush report, Wendy Williams observed: “From our analysis it is also apparent that the deeper-rooted recommendations [made by ICIBI] that refer to systemic or cultural issues, such as stakeholder engagement, or proper evaluation of the impact of policies on different groups of people, or staff training and development, as opposed to process-related recommendations, tend to be left unresolved. The department looks to “close” the recommendation rather than learn.” I agree.

The key points from each inspection report published in 2019-20 are set out later in this Annual Report, together with my overview of the year’s findings. As this was my last full year as Independent Chief Inspector, a number of the inspections looked again at areas that I had inspected before to check whether earlier recommendations had, in fact, been implemented and to gauge whether efficiency and effectiveness had improved.

The picture was mixed, with the EU Settlement Scheme standing out as an example of how to plan, resource and implement a function, though not without room for improvement. However, as I observed last year, what inspections too often showed was that BICS does not have the capacity or some of the capabilities it needs to do everything required of it consistently well, or in some cases at all, and is less a “system” than a set of related but not always connected or coherent functions.

Three Home Secretary-commissioned independent reviews[5] of BICS were underway in 2019-20, each with the potential to make a significant difference to its efficiency and effectiveness, as well as to organisational culture. It remains to be seen how far the Home Office is prepared to embrace reform. But, the point I made to each of the reviewers was that, whatever other changes it makes, BICS needs to focus on getting “the basics” right. This includes creating and maintaining accurate and retrievable records; quality assuring decisions; generating and making use of reliable data and management information to inform policies, priorities and performance; communicating clearly (which includes listening) to staff and the users of its services; and developing the right tools and IT to support its business.

As before, I met quarterly with each of the BICS Directors General, and every four to six weeks on average with the Second Permanent Secretary, responsible for BICS and also my departmental sponsor. We discussed inspection findings and recommendations as well as the directorates’ current issues and plans. These meetings were useful, not least in helping me to fine-tune my inspection programme, including the timing and focus of future inspections.

I have always found BICS’ top management to be supportive of the work of ICIBI. However, as I mentioned in my last Annual Report, relationships between the ICIBI and the Home Office were generally poorer at the working level in 2018-19 than they had been in the previous year. During 2019-20, while inspectors and inspected disagreed over certain points, I am pleased to say that working relationships were much improved. A good deal of the credit for this must go to my Chief of Staff and

5 ‘The Windrush Lessons Learned Review’, the Law Commission’s ‘Simplifying the Immigration Rules’ review, and a review of BICS systems, structures, accountability and working practices, led by Kate Lampard, CBE.

the Home Office Pre-Inspection Team for gripping this issue and stepping in where necessary to defuse potential problems.

I had more meetings with ministers in 2019-20 than in 2018-19 (two with the Home Secretary and five with an Immigration Minister). However, because of the changeover of ministers both before and after the election, these were mostly introductory meetings.

My one meeting with the current Home Secretary was in the wake of the Purfleet tragedy,[6] to discuss ICIBI's previous findings and recommendations in relation to border security, plus the emerging findings from a 'live' inspection on clandestine entry,[7] and other work that was in progress. Following this meeting, I wrote thanking her for the opportunity to discuss ICIBI's work in more depth than usual and recommending that ministers meet my successor more regularly to hear inspection findings and recommendations earlier and at first hand, since this would make the process more dynamic and capable of affecting change.

Home Office HQ, 2 Marsham Street, City of Westminster

While it is important to maintain a good working relationship with officials, I argued that when the Inspectorate was created the intention was that the Chief Inspector would provide the Home Secretary with insights and advice independently of the department, whereas, in practice, my reports are filtered through officials. In her response, the Home Secretary recognised the importance of direct contact with ministers, as well as a close relationship with officials, and since the start of 2020 I have met and corresponded with both Immigration Ministers.[8] Now that my appointment has been extended to October 2020, I would hope to have further meetings. However, my successor will want to ensure that they establish effective lines of communication with ministers from the outset.

ICIBI's engagement with external stakeholders is covered in detail later in this Annual Report. In brief, despite the risks to ICIBI's credibility created by the delays in publishing reports, stakeholder relationships remained strong. Feedback from members of ICIBI's standing stakeholder fora, including the newly formed 'Adults at Risk Forum', was positive. For the most part, this was also true of the reception via social media of reports and 'calls for evidence', though inevitably some commentators would have liked to see stronger criticism of the Home Office and recommendations for changes in government policy. The latter is beyond ICIBI's remit. However, departmental "policies" are not and I have tried in reports to identify wherever they impact on efficiency and effectiveness, as in the case of the 'onshoring' of visa decision making, for example.

Throughout 2019-20, I continued to receive emails and letters from individuals who believed that the Home Office had failed them in some way and were looking to me for a remedy. It is not within the ICIBI's powers to overturn Home Office decisions or to require it to act in an individual case. As in previous years, ICIBI advised correspondents to contact the Home Office and provided information on how to do so. Where it appeared there might be a wider problem, ICIBI contacted the relevant directorate and sought assurances that this was not the case.

6 https://www.bbc.co.uk/news/uk-england-essex-50268939

7 The report, 'An Inspection of the Home Office's response to in-country clandestine arrivals ('lorry drops') and to irregular migrants arriving via 'small boats''. (May 2019 – March 2020)', was sent to the Home Secretary on 13 March 2020.

8 Kevin Foster, MP, is Parliamentary Under Secretary of State (Minister for Future Borders and Immigration), and Chris Philp, MP, is Parliamentary Under Secretary of State (Minister for Immigration Compliance and the Courts).

I had more engagement with Parliamentary bodies in 2019-20 than in 2018-19, and inspection reports, including from earlier years, were referenced in debates in both Houses. However, to get more value from ICIBI's output and potential, I believe there is scope for greater engagement, and the take-up by MPs of my invitation to provide evidence for 'An inspection of the Handling [by BICS] of Complaints and Correspondence from Members of Parliament'[9] was disappointing.

Partly to share experiences and best practice, but also to avoid unnecessary duplication in terms of our respective work programmes, I continued to meet with other inspecting and monitoring bodies. As before, this included Her Majesty's Inspectorate of Prisons, the National Audit Office (NAO), the Government Internal Audit Agency (GIAA), and the Equality and Human Rights Commission (EHRC), but there was also a first meeting with the Health and Safety Executive (HSE) in advance of an HSE evaluation of Border Force operations, and with the newly appointed Immigration Services Commissioner (OISC).

Meanwhile, ICIBI's shared accommodation with the Independent Anti-Slavery Commissioner (IASC) meant that, since her appointment in August 2019, I have had a number of informal conversations with Dame Sara Thornton, and ICIBI has begun work on a new inspection focusing on modern slavery, which will report in June 2020.

I did not make any overseas visits in 2019-20, although in March 2019 my inspectors visited Warsaw and Manila as part of the inspection of onshoring of visa decision making,[10] and during 2019-20 inspectors visited the juxtaposed controls in France in relation to clandestine entry,[11] Pretoria[12] and Madrid.[13] During the course of the year, I did visit various Home Office locations, and also Harmondsworth IRC,[14] the UK Visa and Citizenship Service Centre in Croydon, the Border Force vessels based at Ramsgate and Dover, and Taylor House (the First-tier Tribunal). As ever, it was instructive to see things at first-hand and to talk to Home Office staff, commercial partners and stakeholders in situ, and I am grateful to everyone who hosted a visit and for their candour.

David Bolt on the bridge of a Border Force patrol vessel

I began 2019-20 in the knowledge that my five-year appointment as Independent Chief Inspector came to an end in April 2020. Therefore, one of my objectives was to ensure that I left ICIBI in the best possible shape for my successor. In addition to delivering the final year of my 3-Year rolling Inspection Plan, this meant getting the Inspectorate up to full strength and improving staff engagement.

9 Report submitted on 4 July 2019. Not published in 2019-20.
10 '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)', published 6 February 2020.
11 'An Inspection of the Home Office's response to in-country clandestine arrivals ('lorry drops') and to irregular migrants arriving via 'small boats''. (May 2019 – March 2020)', report submitted on 13 March 2020.
12 For 'An inspection of family reunion applications (June – December 2019)', submitted on 7 January 2020. Not published in 2019-20.
13 For 'An inspection of the Home Office's use of sanctions and penalties', which will report in 2020-21.
14 This was the last in a series of visits to IRCs and prisons in connection with my 'Annual inspection of "adults at risk in immigration detention" (2018-19)', submitted on 29 July 2019 and published 29 April 2020.

I set both as priorities for my Chief of Staff and the success of both owes much to her efforts and management skills.

As an indicator of staff engagement, ICIBI's 2019 People Survey[15] results showed marked improvements on the 2018 scores in almost all areas. More generally, despite the pressures from being well under strength throughout 2019-20, and the frustrations with delayed reports, there was a good working atmosphere within the Inspectorate, and I would like to record my thanks to all of my staff for their hard work, fortitude and support.

Having invested resources in recruitment, at the time of writing ICIBI is almost up to full strength, for the first time in two years, and now has a pipeline of further recruits and returnees from career breaks that should see it maintain or slightly exceed its agreed staffing levels at least until the middle of 2020-21 (see 'Resources' for further details).

In March 2020, I was asked if I would be prepared to continue in post until October 2020 while a successor was found. I was happy to agree, not least as this will permit me to see through a number of inspections where reports are either awaiting publication or have yet to be completed.

In April 2020, I published an updated Inspection Plan (see Appendix 4), including new inspections that will begin between now and October 2020. It is likely to fall to my successor to complete and report on some of these. Thereafter, it will be for the new Independent Chief Inspector to set their own Inspection Plan, since deciding what to inspect and when is one of the most important aspects of the role's independence. It is also a key reason why the past five years have been both enormously challenging and highly enjoyable.

David Bolt
Independent Chief Inspector
May 2020

15 The annual Civil Service People Survey is used to measure staff engagement. It is confidential. Staff give their views on leadership, management, the workplace, their work and treatment, which are fed back to managers in the form of comparative statistics (year-on-year and cross-department) as a basis for continuous improvement.

Role and Remit

Legislative Framework

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 Act (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 UK Borders Act 2007 empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions, with the exception of those exercised at removal centres, short-term holding facilities and under escort arrangements unless directed to do so by the Home Secretary. The latter are subject to inspection by Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectors of Constabulary (and equivalents in Scotland and Northern Ireland).

The UK Borders Act 2007 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 things
- practice and 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)
- compliance with 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)
- practice and 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
- practice and 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, referred to as "Home Secretary Commissions".

In July 2018, in response to Stephen Shaw's follow-up review of the welfare of vulnerable persons in detention,[16] the then Home Secretary wrote formally commissioning an annual review of the workings of the adults at risk in immigration detention policy.

Section 51 of the UK Borders Act 2007 covers the inspection planning process, which includes the requirement to consult the Secretary of State when preparing a plan (in practice, the plan for the coming year).[17]

The legislation also requires the Independent Chief Inspector to prepare a plan for each inspection, describing its objectives and terms of reference, but also makes it clear that this does not prevent the Independent Chief Inspector from doing anything that is not mentioned in any plan. (A Protocol, agreed with the Home Office, defines responsibilities, processes, and timescales, both satisfying the legislation and ensuring that inspections proceed efficiently.)

The Independent Chief Inspector is required to report in writing to the Secretary of State in relation to the performance of the functions specified. (In practice, this means submitting a detailed report for each inspection, plus an Annual Report.)

In 2014, the Secretary of State assumed control of the publication of inspection reports, deciding when to lay them before Parliament.[18] At that time, the Secretary of State committed to doing this within eight weeks of receipt of the report, 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 such cases, the legislation permits the Secretary of State to omit the relevant passages from the published report.[19]

Statement of Purpose

It follows from the legislation that the Independent Chief Inspector's role is to use the evidence gathered during inspections to challenge inefficiency, ineffectiveness or inconsistency, but to do so constructively and with the aim of helping to bring about improvements. To provide the appropriate focus and approach to its work, the Inspectorate has therefore devised a short 'Statement of Purpose':

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

The Inspection Process

The legislation covers in detail what the Independent Chief Inspector is directed to consider, but it does not prescribe how inspections are to be conducted.

The Inspectorate has developed a three-stage inspection process. This is tailored to fit each inspection, but is normally expected to take 100 days (20 weeks) from start to finish:

16 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728376/Shaw_report_2018_Final_web_accessible.pdf
17 The 2020-21 Plan was shared with the Home Secretary on 1 April 2020 and published on the ICIBI website on 21 April 2020.
18 As soon as they are laid in Parliament, inspection reports are published on the ICIBI website, together with the Home Office's formal response to the report and its recommendations.
19 One report published in 2019-20, 'An inspection of Border Force operations at Glasgow and Edinburgh airports (January – March 2019)', contained redactions. These were made on national security grounds. The redactions are clearly marked in the published report.

Stage 1: Planning

- Scoping
- Open source research
- Preliminary evidence request
- Familiarisation visit(s)
- Project Initiation Document sign off by the Independent Chief Inspector
- Formal notification to the Home Office and full evidence request
- Stakeholder engagement – requests for written submissions
- Website 'call for evidence'

Stage 2: Inspecting

- Evidence analysis, including sampling of case files
- Stakeholder meeting(s)
- On-site visit
  - Interviews
  - Focus groups
  - Observations
- Review by the Independent Chief Inspector
- Further evidence request (if required)

Stage 3: Reporting

- Presentation of emerging findings to the Home Office
- Drafting of report
- Factual accuracy check of draft report by the Home Office
- Report finalised and sent to the Home Secretary

ICIBI 'Expectations'

In November 2018, ICIBI published a set of 'Expectations' (see Appendix 6).

The 'Expectations' cover the key factors that, based on ICIBI's knowledge and experience, affect the efficiency and effectiveness of all asylum, immigration, nationality and customs functions. They provide the starting point for all inspections, and inspectors will test for evidence of each of them, before examining any other areas that are specific to the particular inspection.

The 'Expectations' are intended to be helpful not just to ICIBI inspectors, but also to the Home Office and others responsible for delivering these functions, as well as to anyone who encounters them and to other stakeholders. To that end, they are written in plain English, and no specialist knowledge of the borders and immigration system or of inspecting is required to interpret them.

Inspection Findings 2019-20

Overview

Twelve inspection reports were laid in Parliament in 2019-20. They are listed at Appendix 1. The full reports can be found on the Inspectorate's website, together with the Home Office's formal responses to the reports and to each of the recommendations. The key points from each inspection are set out below.

Some of the areas covered were ones ICIBI had not previously inspected, while others were re-inspections or further examinations, enabling inspectors to check on the implementation of earlier recommendations and to compare past and present performance.

Perhaps the most striking thing to emerge from this set of inspections was the contrast between the look and feel of the new (as of August 2018) EU Settlement Scheme (EUSS) and other established BICS functions.

Past reports have noted that Borders, Immigration and Citizenship System (BICS) does not appear to have the capacity, or in some cases the capabilities, to do everything required of it efficiently and effectively on a sustained basis. During 2019-20, the EUSS stood out as well resourced (arguably over staffed, at least initially). It also had the advantage of: time to prepare and to test systems; devising its processes from scratch, keeping them simple, with bespoke IT and built-in automation; and the close interest and support of ministers, ensuring it remained an organisational priority. The clear message to staff, many of them new to the Home Office, to "look to grant" also contributed to the upbeat impression of how this new work was being handled.

Serious criticisms have been levelled at the EUSS, including: at the principle of requiring EU citizens to apply for settlement; at how the Scheme has been designed, for example, not providing documentary proof of status; and at how it is operating in practice. The two EUSS inspection reports published in 2019-20 focused on the latter question and identified a number of areas requiring improvement and some risks that needed to be managed. Nonetheless, EUSS still looked in better overall shape than most of the other areas inspected during the year.

The last ICIBI Annual Report described 2018-19 as "a particularly difficult year" for BICS directorates, as they sought to deliver "business as usual" while also preparing for the UK's exit from the European Union and living under the shadow of the Windrush revelations. With the same issues largely unresolved, and with ministerial changes pre- and post-election, 2019-20 has appeared no easier.

In 2019-20, as ever, inspection reports have attempted to reflect the realities for BICS and to recommend practical ways of improving its efficiency and effectiveness rather than counsels of perfection. The twelve reports contained 58 recommendations, of which the Home Office accepted 40 (69%), partially accepted 14 (24%), and did not accept 4 (7%). But, while the "acceptance rate" was an improvement on 2018-19, the detailed responses were still too often caveated or non-specific in terms of what the Home Office would do and by when.

Summary of findings from 2019-20 inspections

The 2019-20 Inspection Plan was set out under five 'Themes', reflecting the main purpose or outcome of the Home Office's various borders and immigration functions. This format is followed below. In practice, most inspections touched on more than one Theme.

Theme 1: Protecting the border (identifying and intercepting risks and threats)

Three inspections had 'protecting the border' as their main Theme.

A re-inspection of Border Force operations at Coventry and Langley postal hubs (November 2018 – January 2019)

The inspection report[20] was submitted on 31 January 2019 and published on 4 April 2019 (nine weeks).[21]

My original 2016 inspection report on Border Force operations at the postal hubs (known as 'Offices of Exchange') at Coventry (Coventry International Hub) and Langley (Heathrow Worldwide Distribution Centre) made eight recommendations, all of which were accepted by the Home Office. The re-inspection looked at the progress Border Force had made towards implementing each of those recommendations and found that four, plus an element of a fifth, could now be considered "Closed".

Overall, Border Force continued to work efficiently and effectively at both locations, where it performed two main customs functions in relation to the 'postal packets' (letters, parcels, packets and other articles) arriving in the UK from overseas by post: the detection and seizure of controlled and prohibited items and the identification of items where duties are owed and levying of the appropriate charges.

However, there was still work to do to ensure that intelligence flowing from and into the hubs was timely and actionable. Some of this – the flows between the hubs and the Fast Parcels Joint Border Intelligence Unit (FP JBIU) – was in Border Force's hands to fix. The adoption, investigation and, where appropriate, prosecution of detections and seizures also relied on the capacity and priorities of police forces and other partner agencies. Nonetheless, Border Force needed to ensure that it was doing everything it could, both at a strategic and operational level, to assist and encourage greater take-up.

The re-inspection report made two recommendations. The first, in five parts, concerned completing the actions necessary to close the recommendations from the original inspection. The second, in four parts, identified further improvements that Border Force could and should make in relation to the recommendations that were "Closed".

The Home Office accepted two and partially accepted three of the five parts of the first recommendation, and all four parts of the second. Helpfully, in most cases, it set a completion date for its planned actions.[22]

20 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792674/A_re-inspection_of_Border_Force_operations_at_Coventry_and_Langley_postal_hubs.pdf
21 The published report contains redactions authorised by the Home Secretary on grounds of national security. These are clearly marked within the text of the report.
22 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792622/Formal_Response_Postal_Hubs.pdf

An inspection of Border Force operations at Glasgow and Edinburgh airports (January – March 2019)

The inspection report[23] was sent to the Home Secretary on 13 June 2019. It was published on 31 October 2019 (20 weeks). The report contained three recommendations, all of which the Home Office accepted.[24]

This inspection was an attempt by ICIBI to test a new, streamlined approach to airport inspections that could be repeated at other geographical or similarly sized 'clusters' of airports without the need for a large team of inspectors and extensive preparatory work.

In the ten years since it was created, ICIBI has inspected Border Force operations at a number of major UK airports and seaports, focusing on the efficiency and effectiveness of the fixed immigration and customs controls for arriving passengers. Previous inspections had looked at one airport or terminal at a time. However, as might be expected, many of the findings and the recommendations have been broadly similar at each airport.

Edinburgh airport

With this in mind, the aim was to use ICIBI's experience and knowledge of airport operations, alongside ICIBI's 'Expectations', to produce a short, easily replicated inspection process and report. In that it still required a great deal of effort and took longer to complete than was planned, the experiment was a qualified success, but with lessons for next time.

This inspection examined Border Force operations at Glasgow and Edinburgh Airports, respectively the sixth and eighth busiest airports in the UK for passenger traffic. It found that Border Force's management of the immigration and customs controls was effective from a border security perspective, but there were criticisms from the airport operators and from passengers of its efficiency in managing the immigration queues, not helped by the absence of a robust, standardised way of measuring queuing times.

One of the report's three recommendations related to queue measurement. The other two focused on ensuring that Border Force operational managers, not just at Glasgow and Edinburgh, understand and articulate their risks thoroughly and consistently. At Glasgow and Edinburgh this meant engaging more effectively with the airport operators, ensuring that staff 'rostering' was efficient and seen as reasonable, maximising ePassport gate uptake, improving the recording and quality assurance of decisions, and ensuring that safeguarding strategies and actions test for new or changing threats as well as targeting known 'high-risk' flights.

23 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843544/An_inspection_of_Border_Force_operations_Web_Accessible.pdf
24 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/840085/Government_response_to_ICIBI_inspection_of_Border_Force_operations_at_Glasgow___Edinburgh_Airports_v2.pdf

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)

The inspection report[25] was sent to the Home Secretary on 23 September 2019. It was published on 6 February 2020 (19 weeks).

Since January 2008, the Home Office has closed over 100 overseas Decision Making Centres (DMCs). When the report was submitted, only ten overseas DMCs remained and visa decision making had been 'onshored' to the UK, primarily in Croydon and Sheffield, with some visa decisions also made in Liverpool.

The inspection examined UK Visas and Immigration's (UKVI's) 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 on the timeliness and quality of its decisions.

The closure of overseas DMCs had 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 was about the UK's international reputation and whether it appeared 'open for business' and welcoming.

There were 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. However, 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 the vast volumes of applications it received (the 'intake') also came in for criticism and one of ICIBI's recommendations was that the Home Office made efforts to demystify the Tool and how it works to try to address stakeholders' concerns about its influence on decision making.

Greater transparency was also needed in relation to the workings of Visa Application Centres (VACs), which were heavily criticised by some stakeholders. As the Home Office's overseas footprint shrank, the outsourcing of 'front-end services' to commercial partners made perfect business sense. Numerous other countries had followed the same path. But, the Home Office needed to demonstrate that it was committed to ensuring that this key stage of the application process was working efficiently and effectively.

In 2016, the Home Office closed eight DMCs, in 2017 it closed four, in 2018 three, and in 2019 (to September) another one, and over this period it onshored all net migration applications. However, the 2018 Immigration White Paper was silent on network consolidation and the onshoring of visa decision making and it appeared that the last time ministerial approval had been formally sought for the Network Consolidation Programme was in 2016, since when there had been significant turnover in ministers and senior officials. Therefore, another of ICIBI's recommendations was that the Home

25 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863627/ICIBI_An_inspection_of_the_Home_Office_s_Network_Consolidation_Programme.pdf

Office confirmed that ministers continued to support the Programme and specifically the next phase of planned closures.

The report acknowledged that, from a 'UK PLC' perspective, the arguments from the FCO and others about the UK's reputation overseas as an attractive destination for visitors, business and international students needed to be given appropriate weight when deciding on any further DMC closures. But, solely in terms of Home Office efficiency and effectiveness, it observed that the logical extension of the network consolidation strategy was to close all remaining overseas DMCs as soon as the UK DMCs were staffed and equipped to take on their work. UKVI was at pains to point out, however, that this was not its current policy.

Regardless of current or future plans, the report concluded that the Home Office needed to do more to evidence that its actions not only saved it money but that the results were 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 required better performance data than the Home Office was collecting, better analysis, and better communication about its thinking and short-, medium- and long-term plans for processing visa applications.

The report contained five recommendations. The thrust of all five was that the Home Office should be more straightforward and more transparent about its plans, processes and performance.

Four recommendations were accepted and one rejected.[26] The latter concerned communicating proposals for Phase 3 of the Programme by the end of 2019-20 and the Home Office explained that "Phase 2 lasts until 2021 and there are no plans at present, even in outline, for Phase 3 of network consolidation. If this remains the case at the end of the 2019 – 20 financial year, there will be no proposals to share."

Although it "accepted" the recommendation to provide more information about the "Streaming Tool", the Home Office's accompanying narrative was qualified, sounding a note of caution about the risk that greater transparency could be exploited by "unscrupulous parties". Given that the vast majority of visa applicants are not looking to manipulate the system but simply to understand how to make a successful application, this raised questions about whether it was getting the balance right, particularly in light of its "excellent customer service" ambitions.

Clearly, ICIBI would not advocate any weakening of essential checks and controls, but by appearing reluctant to reveal any more than it absolutely has to about the way visa decisions are made the Home Office risks fuelling concerns about bias and poor practice.

26 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862274/Network_consolidation_ICIBI_formal_response.pdf

Theme 2: Providing a service (processing applicants, claimants and customers)

Four inspections had 'providing a service' as their main Theme.

A re-inspection of the Home Office's application of the good character requirement in the case of young persons who apply for registration as British citizens (August 2018 – January 2019)

The inspection report[27] was sent to the Home Secretary on 31 January 2019 and published on 4 April 2019 (nine weeks). It contained two recommendations. The Home Office accepted one "in full" and partially accepted the other.[28]

The original inspection report looking at the Home Office's application of the good character requirement in the case of young persons who apply for registration as British citizens was published in July 2017. It made two recommendations, both of which related to published guidance. Both were accepted by the Home Office, who committed to publishing updated guidance by the end of December 2017.

The re-inspection began in August 2018, at which time the good character guidance had not been updated. New 'Nationality: good character requirement' guidance was finally published on 14 January 2019.

The re-inspection report provided a chronology of the Home Office's progress towards implementing the original recommendations, together with its explanations for the delays, and an initial read-out on the new guidance. Since the latter appeared, in large part, simply to restate the previous policy, albeit with more explicit references to its application to children and young persons, it was hard to see why it should have taken the Home Office so much longer than it had originally thought to publish it.

Moreover, the new guidance failed to address the question of caseworker discretion as had been recommended, except in the most general terms, although the process change in September 2018 that required decisions to refuse on good character grounds to be authorised by a senior caseworker could be expected to go some way towards this.

As well as the guidance, the re-inspection also looked at its application and the report examined the 28 cases between 13 July 2017 and 30 August 2018 where a child applicant was refused on good character grounds. In each instance, the applicant's criminal history was the basis for the refusal and, according to Home Office records, in the majority of these the offence was one that most people would regard as serious, although most resulted in a caution rather than a criminal conviction.

However, the general standard of the record keeping was not commensurate with either the complexity of the cases or the significance of these decisions, and it was telling that the Home Office was unable without carrying out a case by case review to provide examples of applications made since 13 July 2017 where considerations of the child's 'best interests' had outweighed the good character considerations set out in the guidance and resulted in the application being granted.

The re-inspection report's two new recommendations related to the close monitoring by the Home Office of the effects of the new guidance, and to better record keeping regarding decisions.

27 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792677/A_re-inspection_of_the_Home_Office_s_application_of_the_good_character_requirement_in_the_case_of_young_persons_who_apply_for_registration_as_British_cit.pdf
28 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792624/Formal_response_Good_Character.pdf

The latter referred to a "full and accurate account of the considerations that have been given to the Home Secretary's Section 55 obligations" recording "that the child's 'best interests' have been thoroughly explored" and ensuring that this includes "the child's "voice"". The Home Office's partial acceptance was "on the basis that the child's voice is not a mandatory part of the citizenship application. Citizenship applications for children are almost exclusively made by a responsible adult or guardian on behalf of the child applicant and no direct interaction with the child is necessary nor takes place." While true, the Home Office should be actively reaching out to the responsible adult or guardian and ensure that they provide as much information as possible in support of the application, including the child's view.

An inspection of the policies and practices of the Home Office's Borders, Immigration and Citizenship Systems relating to charging and fees (June 2018 – January 2019)

The inspection report[29] was sent to the Home Secretary on 24 January 2019 and published on 4 April 2019 (ten weeks). It contained 12 recommendations, three of which were accepted, seven partially accepted, and two not accepted.

While the inspection and the report tried to cover the technical aspects of the Home Office's charging strategy and fee setting to the extent that this was essential to an understanding of the current position, the focus was on how effectively the Home Office had explained its overall approach, the reasons for particular fee levels and annual increases, how the fees link to service delivery and standards, and how the Home Office had responded to what its customers and stakeholders had had to say on these matters.

This approach recognised that the vast majority of 'customers' of the services offered by the Home Office's Borders, Immigration and Citizenship System (BICS) were not trained accountants, economists or statisticians. What these customers expected was transparency (so that they knew what they were eligible or entitled to receive), fairness (that what was offered was lawful, reasonable, consistent and coherent), and reliability (that they got what had been promised, on time and correct). Where they had to pay a fee for a particular service they also expected 'value for money'.

The report looked to reflect the voices of customers and stakeholders. The 'call for evidence' for this inspection, published on the ICIBI website, produced a far greater response than for any previous inspection. A number of people were clearly distressed by the effect the fees had had on them or their family or friends. While ICIBI could not take up individual cases, the report attempted to summarise the main themes and arguments from the many hundreds of responses.

One of the concerns raised was that the fee for EU settlement might prevent some people, particularly larger, less well-off families, from accessing their EU rights. After the report had been drafted and sent to the Home Office for factual accuracy checking, the Home Secretary announced that the Home Office would no longer charge a fee for registration. However, the original concerns as expressed were still included in the final report, not least as it raised questions about the continued justification for previous refusals to consider fee reductions or exemptions, for example for child registrations for citizenship, on grounds that it would reduce the amount of funding available to the Home Office to fund the immigration system.

29 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792682/An_inspection_of_the_policies_and_practices_of_the_Home_Office_s_Borders__Immigration_and_Citizenship_Systems_relating_to_charging_and_fees.pdf

The Home Office response to the draft report pointed out that its financial position had developed since 2015 (the last Spending Review) and it had "reigned back on self-funding, moving from an objective for self-funding by 2019-20 to an ambition to increase the extent to which BICS is funded by those who use its services".

To avoid any doubts about what this meant, the report recommended that the Home Office should clarify its position regarding when, or if, the BICS intends to become "self-funding", including what this means in figures and what elements of the BICS "operation", and any related activities, are included and excluded from the calculations. In its response to the draft report, the Home Office had recognised that it would need to do this as part of the planned 2019 Comprehensive Spending Review.[30] However, the report suggested that "given how much has rested on the self-funding argument over recent years some clarity is needed before the 2019-20 fees are published".

The report contained 12 recommendations, most of which concerned providing more and better information to explain how the fees had been calculated. They also focused on the effects of the fees on vulnerable individuals, including children, and the need for the Home Office to demonstrate that it had fully considered these effects in determining fee levels, annual increases, the availability of waivers, and refunds.

The Home Office correctly pointed out that general government policy was that Policy Equality Statements produced by officials for ministers were not normally published and that it had followed HMG policy and guidance in relation to Impact Assessments. However, the report challenged it to recognise that, if it was serious about providing good customer service, its lack of transparency was at best unhelpful.

The Home Office accepted or partially accepted ten of the 12 recommendations and, by the time the report was published (14 weeks after it was received) it had already implemented or begun to implement some changes.[31]

Two recommendations were "not accepted": one to run a full public consultation in advance of the 2019 Comprehensive Spending Review (CSR), and to provide a breakdown of how the "benefits likely to accrue" have been calculated and to refund this element of the fee where applications for nationality and settlement are refused (except on grounds of fraud) and retain only the administration element.

The argument for rejecting the first of these recommendations was that there was insufficient time to run a public consultation. This did not stand up. One could have been launched when the report was received in January 2019 and could still have been launched when it was published in April 2019 to run in parallel with the CSR 2019 process.

However, the second rejection was more concerning, in particular in relation to the refunding of the "benefits" element of fees, which in the case of nationality and settlement applications are high. The Home Office stated that it would "carefully consider" all of the recommendations "in the context of the next Spending Review". But this was a question of basic fairness, which should not have to wait on discussions with the Treasury about the department's future funding.

30 https://www.gov.uk/government/publications/spending-round-2019-document/spending-round-2019
31 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792428/19_04_04_Formal_response_Charging_inspection.pdf

An inspection of the EU Settlement Scheme (November 2018 – January 2019)

This inspection was, in effect, a Home Secretary Commission.

EU Settlement Scheme Home Office publicity image

The EU draft Withdrawal Agreement,[32] published in March 2019, referred to the creation of a new Independent Monitoring Authority (IMA) to protect the rights of "Union citizens and their family members". The Home Office's 'EU Settlement Scheme: statement of intent', published in June 2018,[33] stated that: "Ahead of [the primary legislation required to create an IMA] the implementation of the EU Settlement Scheme will be monitored by the Independent Chief Inspector for Borders and Immigration (ICIBI)."

Concerns were expressed, including by Guy Verhofstadt on behalf of the European Parliament, that ICIBI's remit did not enable it to fulfil the role envisaged for the IMA. However, the government maintained that "the Independent Chief Inspector of Borders and Immigration (ICIBI) will, through his existing statutory functions in respect of the UK immigration system, provide oversight of the operation of the EU Settlement Scheme. The ICIBI will be able to report on the functioning of the scheme, enabling improvements to be made as appropriate, and, if there are particular aspects of the scheme warranting more detailed enquiry, the ICIBI will be able to inspect these and report on them."[34]

In March 2019, an amendment to the Immigration and Social Security Coordination (EU Withdrawal) Bill was tabled to extend the ICIBI's remit "to inspect any Government department insofar as the department is involved in the EU Settlement Scheme application process", including "the Department for Work and Pensions and Her Majesty's Revenue and Customs".

However, it was withdrawn after the Immigration Minister told Parliament that it was "unnecessary" as "the UK Borders Act 2007 allows the Independent Chief Inspector to inspect the efficiency and effectiveness of services provided by any person acting in relation to the discharge of immigration, nationality, asylum and customs functions. The EU Settlement Scheme is primarily an immigration function. Therefore, the Independent Chief Inspector of Borders and Immigration already has the powers to inspect Government Departments involved in the EU Settlement Scheme application process, and that includes [such] activities undertaken by the Department for Work and Pensions and Her Majesty's Revenue and Customs."[35]

The first inspection report[36] in relation to the EUSS was sent to the Home Secretary on 6 March 2019 and published on 2 May 2019 (eight weeks). It contained seven recommendations, all of which were accepted.[37]

32 https://www.gov.uk/government/publications/draft-withdrawal-agreement-19-march-2018
33 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718237/EU_Settlement_Scheme_SOI_June_2018.pdf
34 Response by the Immigration Minister in December 2018 to the Committee on Exiting the European Union's Eighth Report of Session 2017–19 'The progress of the UK's negotiations on EU Withdrawal: The rights of UK and EU citizens, (HC 1439)', published on 23 July 2018.
35 https://hansard.parliament.uk/Commons/2019-03-05/debates/2eb2dd65-51c1-4a72-82ad-4de5ec48dc97/ImmigrationAndSocialSecurityCo-Ordination(EUWithdrawal)Bill(TenthSitting)
36 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799439/An_inspection_of_the_EU_Settlement_Scheme_May_WEB.PDF
37 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799414/EUSS_Formal__Response.pdf

The Home Office began accepting applications under the EU Settlement Scheme (EUSS) in August 2018. The initial "Private Beta 1" (PB1) phase was small in scale and limited in its scope and duration (eight weeks). The Independent Chief Inspector visited Liverpool and spoke to Home Office staff and to applicants during PB1 but agreed to delay an inspection until the EUSS had been further rolled out and instead wrote to Director General UKVI with some initial observations.

The inspection ran from November 2018 up to the end of the 'Private Beta 2' (PB2) phase in January 2019. It looked specifically at governance of the Project, at staffing, and at the learning the Home Office had gained from its testing, including from the trialling of the 'EU Exit: ID Document Check app' and from the inclusion in PB2 of a small cohort of vulnerable applicants.

The inspection report noted that for the Home Office the EUSS represented both a major challenge and a great opportunity. Processing applications from the estimated 3.5 million EU citizens living in the UK and ensuring each applicant is granted either settled status or pre-settled status in line with their rights was clearly a logistical challenge. But the Home Office also faced a communications challenge, against a climate of mistrust of its intentions and of its competence. And, it was not lost on the department that the Scheme was an opportunity to demonstrate what it was capable of achieving with the right resources, appropriate input from other government departments, and ministerial support for a new ("looking to grant") approach.

While the EUSS had still to launch fully and therefore to be properly tested, the report noted that compared with many other areas of BICS, where systems and staff resources appeared to be under constant strain, forcing them to be largely reactive and to juggle different demands, the EUSS stood out as having been afforded the preparation time, resources and organisational priority to succeed. Morale among the staff working on the EUSS, many of them new to the Home Office, was high, and the report stressed the importance of trying to maintain the positive attitudes when the EUSS became 'business as usual' and workloads became more challenging.

An inspection of the EU Settlement Scheme (April 2019 to August 2019)

The second inspection report[38] on the EU Settlement Scheme (EUSS) was sent to the Home Secretary on 30 September 2019 and published on 27 February 2020 (21 weeks). It contained nine recommendations, four of which were accepted, four partially accepted and one "not accepted".[39]

The inspection covered the period from the public launch of the Scheme on 30 March 2019 to the end of August 2019, although the majority of the inspection activity took place between April and June 2019.

The evidence suggested that, while the first few months of the fully open EUSS had thrown up some challenges, the Home Office was operating within itself, unlike in many other areas, and was managing relatively comfortably. For continuity, the report was structured around the seven recommendations from the first inspection report, but the evolving nature of the EUSS meant this was not a re-inspection as such, and the report also made a number of new recommendations based on the latest findings.

38 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/868259/ICIBI_Inspection_of_the_EU_Settlement_Scheme__Apr_2019_to_Aug_2019_.pdf
39 https://www.gov.uk/government/publications/response-to-an-inspection-of-the-eu-settlement-scheme-april-to-august-2019/the-home-office-response-to-the-icibi-report-an-inspection-of-the-eu-settlement-scheme

The nine recommendations covered a range of issues, including: the ancillary costs of making an application; messaging about timescales for decisions; reassurance that the impacts of the EUSS have been fully considered, in particular for vulnerable and hard-to-reach individuals and groups; foreign language support for applicants with limited English; quality assurance, including better data capture and analysis regarding complaints; staff training; and, clarification of what "reasonable enquiries" the Home Office will make (of other government departments) on behalf of individuals who have difficulty proving their entitlement to apply.

While it accepted or partially accepted eight of the nine recommendations, some of the Home Office's responses were less positive and constructive than expected, particularly given the considerable efforts it had already gone to in order to make the EUSS a success. It rejected one recommendation, which was that it should "Consider whether in removing the fee the department has done enough to make the application process genuinely free and therefore accessible to all applicants, looking at whether calls to the Settlement Resolution Centre should be free or "call backs" guaranteed after a fixed length of call and at whether it could absorb the costs of using an ID checking location."

As well as pointing the Home Office to where it needed to make improvements, this report was intended to provide external stakeholders with an independent view of the way the EUSS was working. However, because the ICIBI's detailed inspection process and reporting arrangements were unable to keep pace with the EUSS in terms of published reports, this was always going to be difficult.

As with all inspection reports, ICIBI pressed the Home Office to implement the recommendations it accepted without waiting for the report to be published. But the Independent Chief Inspector also had several conversations with ministers and senior officials about expediting publication. Despite agreeing that this was in everyone's interest, the report was not published until February 2020, by which time parts of it were inevitably out of date.

Moving into 2020-21, while there is no IMA to monitor the Scheme and investigate alleged breaches, ICIBI has indicated that it will carry out a further inspection. Work on this is likely to begin in June 2020.

Theme 3: Compliance Management and Enforcement

Three inspections had 'compliance management and enforcement' as their main Theme.

A re-inspection into failed right of abode applications and referral for consideration for enforcement action (May – July 2019)

The inspection report[40] was sent to the Home Secretary on 23 October 2019 and published on 12 February 2020 (16 weeks).

This report contained six recommendations, the first of which was that the Home Office should review the recommendations from the original 2016 inspection and, where necessary, complete the actions required to close them. The other five recommendations were new. The Home Office accepted all six recommendations and in its formal response in February 2020 stated that four them were "already implemented".[41]

A Certificate of Entitlement to the Right of Abode confirms that a person is "free to live in, and come and go into and from, the United Kingdom without let or hindrance". The Certificate is obtained by making an application to the Home Office.

In 2016, the Home Secretary commissioned ICIBI to review the process for referring failed right of abode applicants for enforcement action. The inspection found that the numbers of right of abode applications received were small, just over 26,000 in the ten years to 2015, and that over 80% of applications were granted. But, a significant percentage of refused applications were from individuals who had no right to remain in the UK at the time of applying and there was no consistency about referring these individuals for enforcement action, including where they had been identified as having used deception when applying.

The original inspection report contained three recommendations, all of which were accepted by the Home Office. They were aimed at ensuring that, where appropriate, failed applicants were referred for enforcement action and that this was done in a consistent fashion and in line with guidance.

The re-inspection examined how this process was working. It found that improvements had been made, but some elements of the original recommendations were still "Open", despite previous assurances, and there were further areas where improvements were needed.

According to the evidence provided for the re-inspection, the trend in applications received each year was downwards; the refusal rate was low, 10 to 12% in the last two business years; guidance and Standard Operating Procedures were up to date; and, caseworkers were experienced and appeared genuinely committed to providing good customer service. The process should therefore be efficient and effective. However, the Home Office needed to improve its record keeping and quality assurance in order to prove that this was indeed the case and to demonstrate that right of abode work fully supported other BICS functions.

40 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865201/ICIBI_Failed_RIght_of_Abode_Web_version.pdf
41 https://www.gov.uk/government/publications/response-to-a-reinspection-of-failed-right-of-abode-applications/home-office-response-to-a-reinspection-of-failed-right-of-abode-applications-and-referral-for-consideration-of-enforcement-action

A re-inspection of the Home Office's Reporting and Offender Management processes and of its management of non-detained Foreign National Offenders (October 2018 – January 2019)

The re-inspection report[42] was sent to the Home Secretary on 31 January 2019 and published on 9 May 2019 (14 weeks). It contained four recommendations, three of which were accepted, and one partially accepted.[43]

Immigration Enforcement Van

This re-inspection covered two overlapping Home Secretary commissions carried out in tandem and published together in November 2017.

The first, 'An inspection of the Home Office's Reporting and Offender Management processes (December 2016 – March 2017)',[44] had focused on the Home Office's understanding and management of the reporting population, and whether reporting events were effective in moving cases towards conclusion, including how Reporting and Offender Management (ROM) were encouraging voluntary departures, carrying out interviews to progress Emergency Travel Document (ETD) applications, working with partners to resolve barriers to removal, and supporting enforced removals by detaining individuals upon reporting. It also looked at the implementation of policy and guidance relating to the management of absconders.

The second, 'An inspection of the Home Office's management of non-detained Foreign National Offenders (December 2016 – March 2017),[45] examined the efficiency and effectiveness of the Home Office's management of Foreign National Offenders (FNOs) released from prison and not detained pending removal, focusing on the progression of cases towards removal, with particular reference to the actions taken from 2016 onwards following the conviction of a non-detained FNO for the murder of two other FNOs and the Home Office's own internal investigation and identification of lessons and necessary improvements.

The ROMs inspection found that Home Office guidance was clear that reporting events must have some value beyond compliance, but the volumes made this extremely difficult, and this was compounded by poor internal communication and coordination. The way non-compliance with reporting restrictions was recorded and treated was inconsistent, and there was little evidence that effective action was being taken to locate the vast bulk of absconders. Meanwhile, the FNOs inspection identified improvements that the Home Office needed to make to ensure that its processes were as efficient and effective as possible.

The ROMs report contained six recommendations, all of which were accepted by the Home Office. The FNOs inspection contained a further eight, six of which were accepted, one partially accepted, and one not accepted.

The re-inspection revisited all 14 recommendations and also assessed the progress the Home Office had made in its management of the ROM system and non-detained FNOs since November 2017.

42 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800638/A_reinspection_of_the_Home_Office_s_Reporting_and_Offender_Management_processes_and_of_its_management_of_non-detained_Foreign_National_Offenders.PDF
43 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800555/Formal_response_ICIBI_FNO_ROM.PDF
44 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/656588/An_Inspection_of_Home_Office_s_ROM_processes.pdf
45 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/656584/An_inspection_of_non-detained_FNOs.pdf

It found that significant efforts had been made to improve the efficiency and effectiveness of the reporting process, principally through technology-enabled smarter working, and that a good deal of analysis and review work had been done in relation to the management of "out of contact" cases. However, at the time of the inspection much of this had either been newly introduced or was yet to be put into effect and the Home Office was unable to evidence that any of the original six ROM recommendations could be considered "Closed".

The Home Office had been more successful in implementing the recommendations from the FNOs inspection, and inspectors saw sufficient evidence to consider five of the eight recommendations "Closed". However, it had not made the promised improvements in its recording and quality assurance of FNO casework, which raised questions about how well it actually understood and was mitigating the risks. As the original report acknowledged, implementation of the recommendations would not change some of the underlying challenges or risks surrounding the monitoring and removal of non-detained FNOs, but in terms of retaining parliamentary and public confidence it was important that the Home Office was able to demonstrate that it was doing as much as it possibly could to manage them.

The re-inspection report contained four recommendations, the first of which was to act quickly to close the original recommendations, while two others concerned FNO management, including a request (accepted) that the Home Office revisit its rejection of the original recommendation regarding FNOs released to 'no fixed abode', since this was also a matter of demonstrating that it had a grip on the risks.

The final recommendation looked to ensure that the moves towards smarter working at reporting centres did not have the unintended consequence of reducing the Home Office's ability to safeguard vulnerable individuals. In accepting this recommendation, the Home Office referenced the commitments it made in response to 'An inspection of the Home Office's approach to the identification and safeguarding of vulnerable adults (February – May 2018)', published on 10 January 2019.[46]

An inspection of the Home Office's approach to Illegal Working (August – December 2018)

The inspection report[47] was sent to the Home Secretary on 6 February 2019 and published on 9 May 2019 (13 weeks). It contained six recommendations, all of which were "fully" accepted.[48]

The Home Office made it clear in the 2014 and 2016 Immigration Acts that it intended to clamp down on illegal working as part of its "compliant (previously "hostile") environment" strategy. It had long regarded the ability of migrants not legally entitled to work in the UK to find paid employment as key to why many migrants remained in the UK without leave, or worked in breach of the terms of their leave, and that the belief that they would readily find work was a significant 'pull factor' for migrants seeking to reach the UK.

Illegal working also raised other issues. Migrants working illegally in the UK were vulnerable to exploitation and abuse by unscrupulous employers, and businesses employing illegal workers undercut and damaged legitimate businesses, deprived HM Government of revenue in the form of taxes and national insurance payments, and adversely affected the employment prospects of others.

46 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770342/Formal_Response_Vulnerable_Adults.pdf
47 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800641/An_inspection_of_the_Home_Office_s_approach_to_Illegal_Working_Published_May_2018.PDF
48 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800524/Formal_response_Illegal_Working_ICIBI.PDF

Because of its hidden nature, estimating the size of the problem with any confidence has been difficult. However, since at least 2015, when ICIBI last inspected this issue, the Home Office had understood it to be "greater than our capacity to enforce it through traditional arrest activity".

The 2015 inspection report[49] noted a then relatively new shift in emphasis towards encouraging employer compliance through "educational visits" by Immigration Compliance and Enforcement (ICE) teams, rather than continuing to rely primarily on enforcement visits to locate and arrest offenders. Inspectors looked to see how this approach had developed, as well as at the measures introduced since 2015 under the umbrella of the "compliant environment" to strengthen the powers of ICE teams and the penalties for non-compliant employers.

Efforts had been made to develop strategies and encourage partnerships and collaborations with other government departments and with large employers and employer groups in particular sectors, but there were no metrics to show what this had achieved. Meanwhile, 'on the ground' there was little evidence that the shift of emphasis trialled in 2015 had 'stuck', and ICE teams were doing (for the most part professionally and properly from what inspectors observed) what they had always done – deploying in response to allegations received from members of the public, in the majority of cases to restaurants and fast food outlets, and with a focus on a handful of 'removable' nationalities.

The inspection did not look specifically at how Windrush generation individuals had been impacted by Immigration Enforcement's illegal working measures, since the lessons from the Windrush scandal were the subject of an independent review which had yet to report and a compensation scheme for those affected. However, it was evident that Windrush had had a significant effect on Immigration Enforcement, operationally (as a result of the 'pausing' of data sharing with other departments) and psychologically (with Immigration Enforcement perceiving that other departments and agencies, employers and the general public were now less supportive), and that having dispensed with removals targets it was no longer clear, at least to ICE teams, what success looked like.

The majority of the report's six recommendations focused on improving the mechanics of illegal working compliance and enforcement but, while important and necessary, the report noted that these were not enough by themselves to answer the criticism that the Home Office's efforts were not really working, and may have had the unintended consequence of enabling exploitation and discrimination by some employers.

Two recommendations were identified as pivotal to the Home Office changing this: firstly, that it should publish an updated (post-Windrush) strategy and Action Plan for tackling illegal working, supported by clear external and internal communications to ensure maximum buy-in cross-government, by employers and representative organisations, by the general public, and within the Home Office itself as soon as possible; and, secondly, that it should capture, analyse and report the quantitative and qualitative data and information that demonstrated the strategy and actions were not just effective in reducing illegal working and tackling non-compliant employers but were also sensitive to and dealt appropriately with instances of exploitation and abuse.

The Home Office "fully accepted" all six recommendations, but its formal response indicated that implementation remained some way off as it awaited the outcomes of ongoing reviews of the immigration system, including the 'Windrush Lessons Learned Review'. While these should, of course, inform its illegal working strategy, the Home Office offered little clarity about its present thinking or intentions with regard to tackling illegal working and meanwhile the problems identified in the report persisted.

49 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/547674/ICIBI-Report-on-illegal-working-December_2015.pdf

Theme 4: Working with others

There were no published inspection reports under Theme 4 during 2019-20.

However, the reports on network consolidation (Theme 1) and charging and fees (Theme 2) contained significant cross-government elements, and the illegal working report (Theme 3) referred to multi-agency cooperation and data sharing.

In addition, a report on the Home Office's response to in-country clandestine arrivals ('lorry drops') and to irregular migrants arriving via 'small boats', sent to the Home Secretary in March 2020, covered the work done with UK law enforcement agencies, maritime agencies, and the French authorities.

Theme 5: Learning and improving

Two inspections had 'learning and improving' as their main Theme.

Inspection of Country of Origin Information, January 2019 Report

The inspection report[50] was sent to the Home Secretary on 25 March 2019 and published on 18 June 2019 (12 weeks).

The report included expert reviews of Country of Origin products relating to Burma, Iraq and Zimbabwe. In addition to the reviewers' specific recommendations, the report contained one recommendation aimed at Country of Origin Information (COI) products in general.

The recommendation concerned the inclusion in COI products of views and opinions alongside facts where the former had been shown to be factually incorrect. The report argued that this was unhelpful to decision makers, even with the caveat that "The inclusion of a source, however, is not an endorsement of it or any view(s) expressed", and particularly if the source was generally regarded as reliable.

While the Home Office was following EU guidelines, the report recommended that it should "Review its use of multiple sources and ensure that where COI is referring to matters of fact rather than views or opinions it either indicates which is correct or provides sufficient details of the sources (motivation, purpose, knowledge, experience, how and when the information was obtained) to enable the reader to make an informed judgement."

The recommendation was accepted.[51]

Inspection of Country of Origin Information, June 2019 Report

The inspection report[52] was sent to the Home Secretary on 29 July 2019 and published on 11 February 2020 (28 weeks).

The report included expert reviews of Country of Origin products relating to Ethiopia and Jamaica that had been considered and signed off by the Independent Advisory Group on Country Information at its May 2019 meeting.

50 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809931/Inspection_of_Country_of_Origin_Information_2019._Burma__Iraq_and_Zimbabwe.pdf
51 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809748/Home_Office_response_to_the_ICIBI_Inspection_of_COI_2019__002_.pdf
52 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/864833/ICIBI_An_inspection_of_the_Home_Office_s_Country_of_Origin_Information_on_Ethiopia_and_Jamaica.pdf

In addition to the recommendations contained in the reviews, the covering report made one overarching recommendation, that "by the end of 2019-20" the Home Office should "carry out a thorough and open needs analysis for Country of Origin Information (COI), involving both Home Office 'customers' and external stakeholders, and use the results to 'right-size' CPIT[53] and resource it appropriately, and to establish effective ongoing feedback mechanisms".

In substance, this repeated a recommendation from an earlier report[54] that the Home Office had partially accepted and "closed". However, references in CPIT's responses to the reviewers' recommendations regarding the process of requesting and responding to Country of Origin Information Requests (COIRs), and to the notion that decision makers could pursue references to primary sources should they wish to do so, along with CPIT's reported change of style for its 'Background' Country Policy and Information Notes (CPINs) to include "more links and less text", again raised questions about how closely CPIT engaged with its customers and how well each understood the other's needs.

The Home Office accepted the recommendation, but with the caveat "whilst we will reach out to relevant external stakeholders, as we explained in our 'Response to an inspection report on the Home Office's production and use of country of origin information' in January 2018, COI and CPINs are intended for use by Home Office caseworkers, therefore we will focus on their needs."[55]

Completed inspection reports awaiting publication as at 31 March 2020

At the end of 2019-20, there were five completed inspection reports with the Home Secretary waiting to be laid in Parliament:

- 'An inspection of the Handling of Complaints and Correspondence from Members of Parliament by the Home Office Borders, Immigration and Citizenship System (BICS) and Directorates (February – May 2019)', submitted on 4 July 2019
- 'Annual inspection of "adults at risk in immigration detention" (2018-19)', submitted on 29 July 2019
- 'An inspection of family reunion applications (June – December 2019)', submitted on 7 January 2020
- 'An inspection of Administrative Reviews (May – December)', submitted on 24 January 2020
- 'An Inspection of the Home Office's response to in-country clandestine arrivals ('lorry drops') and to irregular migrants arriving via 'small boats''. (May 2019 – March 2020)', submitted on 13 March 2020

53 Country Policy and Information Team, responsible for producing COI products.
54 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677556/An_inspection_of_the_production_and_use_of_Country_of_Origin_Information.pdf
55 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865007/Country_of_Origin_Information_ICIBI_Formal_Response.pdf

‘Live’ inspections as at 31 March 2020

Six inspections were ‘live’ at the end of 2019-20.

- ‘An inspection of the Home Office’s use of language services in the asylum process’
- ‘An inspection of the investigation, disruption and prosecution of perpetrators of modern slavery’
- ‘An inspection of resettlement schemes’
- ‘An inspection of the Home Office’s use of sanctions and penalties’
- ‘An inspection of Home Office Presenting Officers’
- ‘An inspection of BICS intelligence functions, focusing on field officers’

In addition, the ICI’s reports from two IAGCI meetings were still in preparation.

- ‘Inspection of Country Information – December 2019 Report (Albania, Iran, Vietnam)’, report submitted on 2 April 2020
- ‘Inspection of Country Information – March 2020 Report (Thematic review of Sexual Orientation, Gender Identity and Expression COI)’

Independent Advisory Group on Country Information

Purpose

Section 48 (2) (j) of the UK Borders Act 2007 states that the Chief Inspector shall consider and make recommendations about "the content of information and 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 and other officials".

The Independent Advisory Group on Country Information (IAGCI) was established in 2009 by the Chief Inspector, with the purpose of advising him about the content and quality of Country of Origin Information (COI) and guidance notes produced by the Home Office and relied upon by decision makers.

How IAGCI works

IAGCI works as follows:

- Stage 1: Taking account of the volume of asylum claims in relation to particular countries and of when particular COI products were last reviewed, the Chair of IAGCI proposes to the Independent Chief Inspector which countries/products should next be reviewed by the Group.
- Stage 2: Independent reviewers, typically academics with relevant knowledge and expertise, are commissioned to review the products and to recommend amendments (additions, deletions, clarifications), citing their evidence. (The Inspectorate manages the tendering process and funds the reviews, and the Independent Chief Inspector has to sign off on IAGCI's recommended reviewer from those replying to the tender.)
- Stage 3: IAGCI quality assures the submitted reviews and sends them to the Home Office unit responsible for producing COI material (the Country Policy and Information Team (CPIT)) for it to consider and respond to the reviewer's recommendations.
- Stage 4: IAGCI (with the Independent Chief Inspector) holds a meeting with CPIT and the reviewers to go through the reviews and to consider, in particular, any points of disagreement.
- Stage 5: Where the meeting identifies that these are required, IAGCI commissions any further inputs from the reviewer, before signing off the reviews as complete.
- Stage 6: The Independent Chief Inspector produces a covering report with his recommendations, and sends this, with the IAGCI reviews and the CPIT responses, to the Home Secretary to be laid in Parliament in the normal way.

Membership

Membership of the IAGCI is by invitation of the Independent Chief Inspector. It is voluntary and unpaid. Members are respected academics and representatives of organisations with a working interest in country information and how it is used by the Home Office.

I should like to record my thanks to all the members of the IAGCI. Without their expertise, I could not fulfil this important part of my remit. My thanks go especially to Dr Laura Hammond, who completed another year as IAGCI Chair.

List of members 2019-20

Chair:

- Dr Laura Hammond (School of Oriental and African Studies)

Independent members:

- Dr Mike Collyer (Sussex University)
- Dr Ceri Oeppen (Sussex University)
- Dr Patricia Daley (Oxford University)
- Dr Nando Sigona (University of Birmingham)
- Dr Julie Vullnetari (University of Southampton)
- Professor Giorgia Dona (University of East London)

Representative members:

- Judge Susan Pitt (Upper Tribunal – Asylum and Immigration Chamber)
- Katinka Ridderbos (United Nations High Commissioner for Refugees, Geneva)
- Harriet Short (Immigration Law Practitioners' Association)

Meetings

IAGCI aims to meet two or three times a year. During 2019-20, it met in June and December 2019 and again in March 2020.

Published reviews

A list of the country of origin reviews published during 2019-20 is at Appendix 2.

Further details, terms of reference, minutes and reports from the IAGCI can be found at https://www.gov.uk/government/organisations/independent-chief-inspector-of-borders-and-immigration/about/research

Working with others

Stakeholders

Inspection reports and recommendations are addressed to the Home Secretary and are aimed primarily at the Home Office's Borders, Immigration and Citizenship System (BICS) business areas, in particular Border Force, Immigration Enforcement and UK Visas and Immigration.

However, the immigration, asylum, nationality and customs functions performed by and on behalf of the Home Secretary involve and affect a wide range of other bodies, and touch everyone living in or seeking to visit the UK. In order to inform individual inspections and the overall inspection programme, as well as engaging effectively with the Home Office, it is therefore essential that ICIBI reaches out to these 'stakeholders' to understand their many perspectives, interests and concerns and to capture relevant evidence.

As with its dealings with the Home Office, ICIBI aims to develop strong stakeholder relationships, based on trust and openness, while remaining strictly impartial and objective.

Established fora

The Independent Chief Inspector chairs three established stakeholder groups that meet periodically, each of which shares the same terms of reference:

- to inform and advise the Independent Chief Inspector regarding any issues of interest or concern to members or those they represent
- to assist the Independent Chief Inspector with the 3-Year Inspection Plan by proposing topics for inspection and advising on their relative importance and urgency
- to assist the Independent Chief Inspector with the scoping and evidence collection for individual inspections

The Refugee and Asylum Forum (RAF) was created in 2009. Its membership comprises mostly third sector organisations with an interest in and knowledge of the Home Office's work in connection with refugees and asylum seekers and related issues. The RAF met three times in 2019-20, in June and December 2019 and again in February 2020. During the year, ICIBI had a number of other bilateral meetings and exchanges with RAF members, as well as with other third sector organisations who do not normally attend RAF meetings, both in relation to specific inspections and to discuss general issues and priorities.

The Aviation Stakeholder Forum was created in 2011. Membership comprises UK airport and airline operators. During 2019-20, the Aviation Stakeholder Forum met twice, in September 2019 and in February 2020.

The Seaports Stakeholder Forum was also created in 2011. Membership comprises UK seaports and shipping organisations. The Seaports Stakeholder Forum met twice during the year, in September 2019

and again in February 2020. Meanwhile, in April 2019 the Independent Chief Inspector was invited to attend a meeting of the British Ports Association's Port Security and Resilience Group to provide an overview of ICIBI's work and future programme as it related to the maritime sector and to hear from members about their issues and priorities.

In 2019-20, following the Home Secretary's commission to produce an annual review of the functioning of the 'Adults at Risk in Detention' policy, ICIBI created a new Adults at Risk forum (AARF). The AARF met for the first time in June 2019. Membership comprises some of the RAF member organisations, plus a number of other stakeholder organisations that focus specifically on detention issues. The AARF had hoped to hold a further meeting in 2019-20, after the publication of first annual review. However, as the report was not published until 29 April 2020, the AARF meeting was postponed and has been scheduled for June 2020.

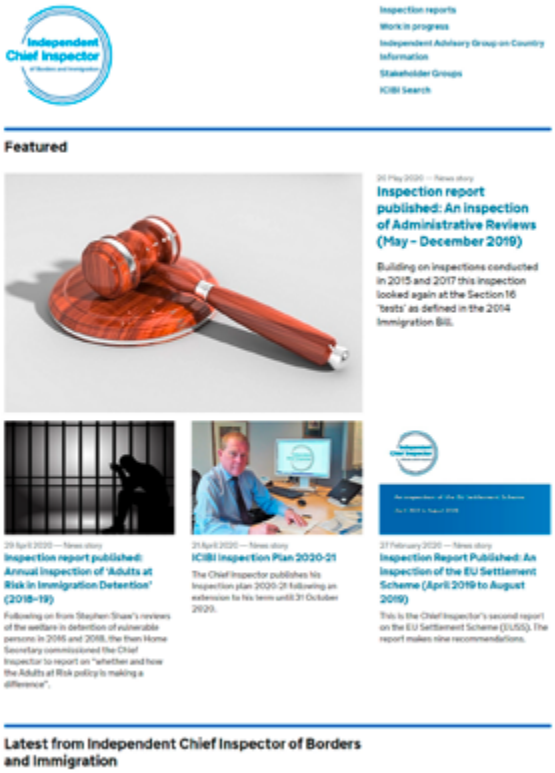
Other stakeholder engagement

As in previous years, ICIBI received a number of approaches from researchers working on various immigration-related projects. In 2019-20, the topics included COI, Family Reunification, and the EUSS. ICIBI continued its policy of helping, wherever possible, by pointing to relevant published findings and responding to specific questions about inspection reports and recommendations.

ICIBI also responded to an approach from the Belgian Federal Migration Centre (Myria),[56] which was compiling a report on transit migration in Belgium and had read 'An inspection of Border Force operations at east coast seaports (July to November 2016)', published in July 2017.

Website

ICIBI uses its website to reach out to stakeholders and to the wider public, including 'customers' of the Home Office's immigration, asylum, nationality and customs functions. One of the main ways of doing this is via 'calls for evidence'. These have become a standard part of the inspection process. During 2019-20, nine 'calls for evidence' were made via the website.



Chief Inspector's website: www.gov.uk/icibi

56 https://www.myria.be/en/about-myria

Engagement with other Inspectorates and similar bodies

Like other statutory inspecting or auditing bodies and ad hoc reviews, ICIBI has its own remit, priorities and reporting arrangements. These limit the opportunities for joint inspections, but not for the sharing of experiences, knowledge and plans, which continued throughout 2019-20.

During the year, the Independent Chief Inspector:

- in April 2019, visited HMP Pentonville with HM Inspectorate of Prisons (HMIP) as part of the evidence gathering for the 'Adults at Risk in Detention' annual review, and followed this up with a joint visit to Lunar House, Croydon, to observe a BICS Case Progression Panel, and a further meeting with HMIP in December 2019 to discuss respective forward work programmes
- in May 2019, met with the Equality and Human Rights Commission (EHRC), which was followed by a session from EHRC on the Public Sector Equality Duty (PSED) at ICIBI's September 2019 training day
- in June 2019, met with the Law Commission team conducting the 'Simplifying the Immigration Rules' review
- in June 2019, met with the Health and Safety Executive (HSE) in advance of an HSE evaluation of Border Force operations
- in July 2019, had an introductory meeting with the UNHCR's new UK Representative, followed by quarterly meetings in October 2019 and January 2020
- in July 2019, attended a Law Society meeting and provided briefing on ICIBI's work
- had three meetings with the National Audit Office (NAO) to discuss respective work programmes and share findings of interest
- had three meetings with the Government Internal Audit Agency (GIAA), formerly Home Office Internal Audit, to share findings and discuss plans for future audits and inspections
- had two meetings with Wendy Williams, in April 2019 and in March 2020, regarding the 'Windrush Lessons Learned Review'
- in December 2019, had a first meeting with the new Immigration Services Commissioner.
- in February 2020, met with Kate Lampard regarding her review of BICS[57] systems, structures, accountability and working practices
- had regular conversations with the Independent Anti-Slavery Commissioner (IASC), Dame Sara Thornton (appointed in August 2019), and her team, with whom ICIBI shares office accommodation, including to agree the scope of a new inspection focusing on modern slavery

57 The review was commissioned by the previous Home Secretary "to ensure [BICS] is ready and able to deliver a world class immigration system" with a focus on "whether BICS has in place the right systems, structures, accountability and working practices to deliver against its goals. It will be forward looking in its nature. It will not consider individual policies or goals, but rather whether the system has the right capabilities to deliver against those stated objectives." https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2019-07-23/HCWS1803/

Home Affairs Committee and other Parliamentary bodies

In April 2019, the Independent Chief Inspector was invited to speak to a meeting of the All-Party Parliamentary Group (APPG) for Africa, the APPG for Diaspora, Development & Migration, and the APPG for Malawi, in relation to their joint enquiry into the Home Office's handling of visit visa applications from African nationals.[58] This was an opportunity to share some insights from the ongoing inspection of the Home Office's Network Consolidation Programme and the 'onshoring' of visa processing and decision making to the UK, and to hear first-hand the concerns of the APPGs client.

In July 2019, the Independent Chief Inspector gave evidence to the House of Lords Home Affairs Sub-Committee in support of its enquiry into the future of EU-UK asylum co-operation post-Brexit. A transcript and video recording of the evidence session are available on the Parliament website.[59]

David Bolt appearing before the EU Home Affairs Sub-Committee

Also in July 2019, the Independent Chief Inspector was invited to speak at an event organised by the chair of the All-Party Group on Visas and Immigration on "The Hostile Environment", the Rt. Hon Keith Vaz, MP. As the keynote speaker, the Independent Chief Inspector provided an overview of the findings from relevant inspections before taking part in a Q&A panel session (with Gracie Bradley, Policy and Campaigns Manager, Liberty; Chai Patel, Legal Policy Director, Joint Council for the Welfare of Immigrants; and Alp Mehmet, Vice Chairman, Migration Watch UK).

The Independent Chief Inspector was invited to give evidence to the Home Affairs Committee (HAC) in support of its enquiry into the Home Office's preparedness for Brexit.[60] The date having been agreed (10 September 2019), Parliament was prorogued and HAC could not sit officially. However, the Committee resolved to go ahead and hold informal discussions with those invitees, including the Independent Chief Inspector, who were content to proceed on that basis.

While the Independent Chief Inspector was not called to give evidence to HAC in support of its enquiry into the EUSS, ICIBI's first report on the Scheme and the Home Office's response were included in the Home Secretary's written evidence[61] and the report's findings and recommendations were cited by the Committee in its 15th Report of the 2017-19 Session, published 30 May 2019,[62] and in the government's response[63] to the HAC report.

58 http://www.afox.ox.ac.uk/wp-content/uploads/2019/07/APPG-Report-on-Visa-problems-for-African-visitors-to-the-UK_v1.57.pdf
59 http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/eu-home-affairs-subcommittee/brexit-future-ukeu-cooperation-on-asylum-and-international-protection/oral/103719.html
60 https://www.parliament.uk/documents/commons-committees/home-affairs/Formal-Minutes-2017-19/Formal-Minutes-2017-19rev.pdf
61 https://www.parliament.uk/documents/commons-committees/home-affairs/Correspondence-17-19/190514-Home-Sec-letter-to-the-Chair-on-EUSS.pdf
62 https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/1945/194502.htm
63 https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/2592/259202.htm

The findings from various inspection reports, including from previous years, were raised in a number of debates in both Chambers and in Westminster Hall during 2019-20.[64] In addition, in January 2020, two amendments (numbers 22 and 23) to the European Union (Withdrawal Agreement) Bill were debated. The first proposed that the Independent Chief Inspector, rather than the Home Secretary, should be responsible for appointing Non-Executive Directors to the Independent Monitoring Authority. The second proposed that the Independent Chief Inspector, jointly with the IMA's Non-Executive Directors, should be responsible for ensuring that the latter made up the majority of the IMA's Board. Both amendments were opposed by the government, who argued that they were unnecessary as Non-Executive appointments would be managed through the Public Appointments process and the Home Secretary would have a statutory duty to ensure the IMA's operational independence.[65]

64 https://hansard.parliament.uk/Commons/2019-05-14/debates/EA89E986-FFE8-46E0-815C-51EE140F0861/ImmigrationApplicationsFeeStructure?highlight=inspector#contribution-A6C9239E-172E-4319-9D68-E3936E67131E
https://hansard.parliament.uk/Lords/2019-06-19/debates/8DF33132-F4EF-4DB1-BF37-E17F0F5C856C/BrexitBorderControls?highlight=inspector#contribution-D9CC41DD-F08A-480F-BDB9-7E466AD69072
https://hansard.parliament.uk/Commons/2019-06-19/debates/7B667153-E403-430C-8784-489D90717085/VisaProcessingAlgorithms?highlight=inspector#contribution-4DC24526-B8E0-42CF-9B08-EDBF036C7F95
https://hansard.parliament.uk/Commons/2019-06-26/debates/1A5B866D-893C-42BA-9BB2-23FEDBA2304D/Immigration?highlight=inspector#contribution-2285BF72-A767-4567-AB24-1C3BE995652E
https://hansard.parliament.uk/Lords/2019-07-18/debates/8BF1C179-529D-473A-A7B2-D87CB7D5D17C/ImmigrationStaffRecruitment?highlight=inspector#contribution-FA078270-56E1-4FE3-A2F9-1CEE514275F8
https://hansard.parliament.uk/Lords/2019-07-23/debates/35861621-1271-4443-8D91-F93CABEF11C4/BritishNationalityAct1981(Remedial)Order2019?highlight=inspector#contribution-FC8A22A3-8CAF-4954-A79E-1CC07A0773C5
https://hansard.parliament.uk/Commons/2019-10-28/debates/4B217694-62CB-4619-9A99-A810081808CD/MajorIncidentInEssex?highlight=inspector#contribution-53F364AE-7455-4E3B-9EB8-6FDB957C616E
65 https://hansard.parliament.uk/Commons/2020-01-07/debates/C5ADC5C3-0008-4CBB-81D6-717666FC7C4B/EuropeanUnion(WithdrawalAgreement)Bill?highlight=inspector#contribution-91CA2421-8A18-4427-96F0-E5CA4AE12A55

Resources and planning

Budget and Staffing 2019-20 and 2020-21

ICIBI's budget is determined by the Home Secretary and delegated to the Independent Chief Inspector under a formal letter of delegation from the Home Office Second Permanent Under Secretary.

The budget for 2019-20 was £2.085 million, the same as 2018-19. Subject to confirmation from the Home Office, the budget for 2020-21 will remain unchanged.

'Pay Costs' (staff salaries, employer's pension and National Insurance contributions) account for the bulk of the total. In 2019-20, as in the previous year, £1.9 million (91%) was designated for 'Pay Costs', with £185k for 'Non-Pay'. There was no allocation for Capital expenditure.[66]

The Inspectorate recorded an overall underspend of £498k (24%) in 2019-20. The underspend on 'Pay Costs' was £480k. See 'Expenditure Report for Financial Year 2019-20' at Appendix 3.

As in previous years, staffing levels remained a problem throughout 2019-20. Since 2015, the agreed headcount has been 30 full-time equivalents (FTEs), including the Independent Chief Inspector. Of these, 25 (83%) are Grade 7 or Senior Executive Officer (SEO) inspector posts. During 2018-19, 11 inspectors left, mostly on promotion (three) or level transfer (six) to a post within the Home Office or another government department, with one retirement and one career break.

Two recruitment campaigns during 2018-19 produced over 100 applications, but just two new joiners, and two internal promotions.[67] Two 'expression of interest'[68] campaigns aimed at existing Home Office staff produced one further new joiner, while one inspector re-joined ICIBI in September 2018 at the end of an overseas posting. A later external recruitment campaign, run with the help of Manpower, was more successful, producing over 200 applications. From this, ICIBI made ten offers of employment at the end of 2018. However, only one new inspector had joined before the end of 2018-19.

Consequently, ICIBI began 2019-20 with just 11 inspectors. Happily, staff retention was less of an issue during the year and only two inspectors left, both on promotion. Meanwhile, in April and May 2019 five new inspectors joined from the 2018 recruitment campaign. A further major recruitment effort in 2019 saw four more inspectors join in February 2020. ICIBI therefore began 2020-21 with 18 inspectors and 23 staff in total.

Another four inspectors recruited via the 2019 campaign arrived at the beginning of April 2020, and two more at the beginning of May 2020, with one inspector leaving on promotion. At the time of writing this Annual Report, ICIBI was almost up to full strength, for the first time in two years. While it is difficult to predict staff departures, which typically proceed quickly once new posts have been secured, ICIBI now has a pipeline of further recruits and returnees from career breaks that should see it maintain or slightly exceed its agreed staffing levels at least until the middle of 2020-21.

66 Since 2016-17, ICIBI's accommodation costs have been met directly by the Home Office.
67 ICIBI follows the Civil Service recruitment process and all Inspectorate staff (except the Independent Chief Inspector) are Home Office employees. All staff are cleared to Security Check (SC) level, with a small number, plus the Independent Chief Inspector, cleared to Developed Vetting (DV) level.
68 'Expressions of interest' are used to invite Home Office staff who would like to take up a vacant post at their existing grade to submit their CV and a covering letter and, if assessed as suitable, to attend a selection interview.

Outlook 2020-21

In theory, 30 FTEs create a 'bank' of c.5,600 'working' days available for inspection work (based on 220 working days per FTE, minus an average of ten days each for training and personal development, and days allocated to essential corporate functions). This is equivalent to 85% of ICIBI's total staff time.

In practice, with so many new inspectors, ICIBI's capacity for inspection work will be lower at least for the first months of 2020-21 as staff learn new skills and gain experience.

For planning purposes, each 'standard' inspection is assumed to require 350 working days (the elapsed time from the start of the inspection to delivery of the finished report to the Home Secretary is 100 days/20 weeks). Some inspections require more, while re-inspections and some more tightly scoped inspections may require fewer resources and be completed more quickly.

Inspection Plan to 31 October 2020

The first rolling 3-Year Inspection Plan was published in 2016. Prior to this, the Independent Chief Inspector had published an annual plan identifying a number of 'announced' inspections and committing to a further number of 'unannounced' inspections.

The aim of the 3-Year Plan was to provide a better sense of the overall shape and range of the Inspectorate's work programme, how planned inspections fitted together thematically, and to signpost when particular topics would be examined. This approach has been largely successful in delivering a balanced and broadly based programme of inspections, as intended, and in the process creating a clearer picture of the underlying issues and systemic improvements required.

In April 2019, I published an updated third and final year of the 2017-18 to 2019-20 Plan. Since deciding what to inspect and when is one of the most important aspects of the Independent Chief Inspector's independence, the Plan did not look beyond the end of my five-year term.

On 10 April 2020, the Home Secretary announced the extension of my appointment until 31 October 2020, following which (on 21 April 2020) I published a list of inspections that ICIBI will begin between now and October 2020, although it is likely to fall to my successor to complete and report on some of these.

The updated Plan for the first half of 2020-21 is informed by the findings and recommendations from previous inspections. It also reflects my discussions with Ministers, officials, and external stakeholders.

Because of the time inspections take to complete, plus the time between reporting to the Home Secretary and the report being laid in Parliament, some inspections straddle two business years. For completeness, the updated Plan includes completed reports that are with the Home Secretary awaiting publication and inspections that were started in 2019-20 and will report over the next few months.

In line with the UK Borders Act 2007, it is also open to the Home Secretary during the course of the year to commission the Independent Chief Inspector to carry out an inspection on any topic.

The 2020-21 Plan comes with three important caveats.

Firstly, it tries to balance maintaining ICIBI as a functioning inspectorate with not over-burdening the Home Office and others at what is an extremely challenging time for everyone due to the Coronavirus pandemic and its impact on 'normal' business.

ICIBI and the Home Office will keep the latter's capacity to assist with particular inspections under review, along with inspection timescales. In the present circumstances, we need to feel our way forward in terms of what is achievable, rather than make plans and commitments that have to be regularly revised.

Regarding the inspection process, some fieldwork will not be possible until things return to normal, but while restrictions continue ICIBI will look to make more use of video conferencing and will focus more on desk-based research and examination of published material, guidance, case records and data. As ever, we will also actively seek input from external stakeholders, through our regular contacts and calls for evidence posted on the website.

Secondly, the Plan takes account of ICIBI's capacity. As noted above, throughout 2019-20 ICIBI operated with roughly half the number of inspectors it should have. From early May 2020, I expect to be fully up to strength but with a relatively inexperienced team. By the second half of 2020-21, the Inspectorate should be in a better position to press ahead with a full programme of inspections.

Thirdly, the Plan does not include any inspections that follow up specifically on Wendy Williams' Windrush Lessons Learned Review, published in March 2020. Many of the underlying themes from this report have been examined in previous ICIBI inspections and some will be explored further in the inspections that are planned. However, the Home Office has indicated that it will respond formally to the report's findings and recommendations in six months, at which stage the new Independent Chief Inspector will wish to consider what this means for the ICIBI's workplan for the remainder of 2020-21 and beyond. In the meantime, I have indicated to the Home Secretary that ICIBI is ready to take on any related work that she may wish to commission.

Training and Development

New joiners receive in-house training from experienced inspectors that takes them through the inspection process step by step. This is consolidated by on-the-job learning, and new staff are attached to a 'live' inspection once they have completed their induction.

In order to perform their ICIBI role more effectively, and for their personal development, ICIBI staff attend skills training courses offered by Civil Service Learning and other providers. For example, in 2019-20, staff attended courses in 'Copy-editing and Proofreading', 'Giving and Receiving Feedback', 'Building Personal and Team Resilience', 'IT security', 'Data Protection' and Heath and Safety'.

By the end of 2019-20, around three-quarters of staff had completed the Chartered Management Institute (CMI) Level 5 Certificate in Management & Leadership in Operational Delivery. Other staff who began the CMI course in 2019-20 are expecting to complete it in the first half of 2020-21.

The CMI Certificate is not dedicated to inspecting but was identified in 2018-19 as the best ready-made fit in terms of the skills needed to be a fully competent ICIBI inspector, in particular the identification, analysis and presentation of data and information, plus several management units. However, during 2019-20 ICIBI continued to explore other training options including with Skills for Justice. While the latter was attractive in that it offered a route to accreditation, the resource commitment required was beyond ICIBI.

ICIBI hosted a number of 'Lunch and Learn' sessions throughout 2019-20, and also held a training day in September 2019. These were opportunities to catch up with Home Office business areas with which ICIBI has regular dealings, such as the Performance, Reporting and Analysis Unit (PRAU) and the Country Policy and Information Team (CPIT), as well as to hear about areas that might feature in future inspections, such as the Future Border and Immigration System (FBIS) and UKVI's Statelessness team. There were also sessions from external stakeholders, including the Equality and Human Rights Commission (EHRC), the Office of the Immigration Services Commissioner, and an Upper Tier Tribunal Judge.

Vision Statement

ICIBI's 'Vision Statement' is intended to sit alongside its stated Purpose (see 'Role and Remit'). It remains unchanged for 2019-20:

"ICIBI will:

- be highly-skilled, professional and effective, with a reputation for the highest standards of work and conduct
- operate thorough, rigorous and transparent processes to reach sound, evidence-based conclusions
- deal with others consistently and reliably
- be efficient, forward-thinking, committed to continuous improvement and focused on delivery
- enable and develop its people"

Values

ICIBI adheres to the Civil Service values:

- integrity
- honesty
- objectivity
- impartiality

Diversity

By agreement with the Independent Chief Inspector, ICIBI staff are employed as permanent or temporary Home Office civil servants.[69] Those recruited from elsewhere become Home Office civil servants on joining ICIBI for the duration of their loan or secondment from their permanent employer.

As at 31 March 2020, the staff profile was:[70]

- 56% female, 44% male
- Age bands
  - 25-39 32%
  - 40-44 24%
  - 45+ 44%
- 65% white, 35% minority ethnic
- 52% not married, 48% married
- 57% Christian, 43% other religions
- 59% with no caring responsibilities, 41% with caring responsibilities
- 96% full-time, 4% part-time
- 60% flexible working pattern, 40% non-flexible working pattern

Continuous improvement

ICIBI is always looking to improve its processes and professionalism.

During 2019-20, inspectors began work on two projects of note, one looking at the 'Safeguarding and Research Ethics' and the second at 'Equality and Human Rights', in each case focusing on how ICIBI conducts itself and how it approaches inspections. The aim during 2020-21 will be to publish the results on the ICIBI website.

69 The Independent Chef Inspector is a public appointee.
70 Percentages rounded to the nearest whole number. Based on Home Office criteria and self-reporting. Breakdown not provided where a category has fewer than five employees. From the data collected by the Home Office, the only categories affected were Sexual Orientation and Disability.

Appendix 1: Inspection Reports published in 2019-20

- 'An inspection of the policies and practices of the Home Office's Borders, Immigration and Citizenship System relating to charging and fees (June 2018 – January 2019)', published on 4 April 2019
- 'A re-inspection of the Home Office's application of the good character requirement in the case of young persons who apply for registration as British citizens (August 2018 – January 2019)', published on 4 April 2019
- 'A re-inspection of Border Force operations at Coventry and Langley postal hubs (November 2018 – January 2019)', published on 4 April 2019
- 'An inspection of the EU Settlement Scheme (November 2018 – January 2019)', published on 2 May 2019
- 'A re-inspection of the Home Office's Reporting and Offender Management processes and of its management of non-detained Foreign National Offenders (October 2018 – January 2019)', published on 9 May 2019
- 'An inspection of the Home Office's approach to Illegal Working (August – December 2018)', published on 9 May 2019
- 'Inspection of Country of Origin Information – January 2019 Report', published on 18 June 2019
- 'An inspection of Border Force operations at Glasgow and Edinburgh airports (January – March 2019)', published on 31 October 2019
- '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)', published on 6 February 2020
- 'Inspection of Country of Origin Information – June 2019 Report', published on 11 February 2020
- 'A re-inspection into failed right of abode applications and referral for consideration for enforcement action (May – July 2019)', published on 12 February 2020
- 'An inspection of the EU Settlement Scheme (April 2019 – August 2019)', published on 27 February 2020

Appendix 2: Reviews of Country Information published in 2019-20

The following reviews were published 18 June 2019

Burma

- Country of Origin Information Requests (COIRs)
- Critics of the Government (March 2017)
- Rohingya (November 2017)

Iraq

- Country of Origin Information Requests (COIRs)
- Perceived collaborators (January 2018)
- Internal relocation, civil documentation and returns (October 2018)

Zimbabwe

- Country of Origin Information Requests (COIRs)
- Sexual orientation and gender identity (May 2018)
- Opposition to the government (November 2018 DRAFT)

The following reviews were published 11 February 2020

Ethiopia

- Country of Origin Information Requests (COIRs)
- Opposition to the government (October 2017)
- Oromos including the “Oromo Protests” (November 2017)

Jamaica

- Homeless Shelters (COIR) (March 2019)
- Fear of organised criminal gangs (March 2017)
- Background information, including actors of protection, and internal relocation (March 2018)

The following review will be published in 2020-21

Thematic

- Sexual Orientation and Gender Identity (31 countries)

Appendix 3: Expenditure Report for Financial Year 2019-20

Resource Pay	**1,420,114.86**
Resource Non-Pay	
Conferences	2,832.37
Office Supplies & Services[71]	43,946.28
Travel Subsistence	65,078.87
Consultancy[72]	15,045.55
Contracted Out Services	1,126.00
Estates	677.95
IT & Comms	1,717.20
Marketing[73]	6,845.50
Other Costs and Services	3,490.62
Pay Costs – One Time	1,580.90
Training & Recruitment[74]	67,836.62
Resource Non-Pay Total	**210,177.86**
Resource Total	**1,630,292.72**
Capital Total[75]	**26.08**
Outside of Budgets[76]	(43,405.92)
Grand Total	**1,586,912.88**

71 Includes costs for report production. New from 2019-20.
72 Payments to Country of Origin report independent reviewers.
73 Includes advertising costs for staff recruitment.
74 Includes agency fees for recruitment fees from 2018-19 and 2019-20.
75 IT and other equipment costs charged in error to Capital. Balance not reallocated by 31 March 2020.
76 Accruals transferred to the 2020-21 budget: £20,500 agency fees for staff recruitment; £14,896.47 report production costs; £5,000 for Country of Origin reviews following up the Sexual Orientation and Gender Identity (SOGI) thematic review; £3,009.45 for season ticket loans.

Appendix 4: ICIBI Inspection Plan 2020-21 (to 31 October 2020)

a. Inspection completed in 2019-20, reports awaiting publication

- 'An inspection of the Handling of Complaints and Correspondence from Members of Parliament by the Home Office Borders, Immigration and Citizenship System (BICS) and Directorates (February – May 2019)', submitted 4 July 2019
- 'Annual inspection of "adults at risk in immigration detention" (2018-19)', submitted 29 July 2019
- 'An inspection of family reunion applications (June – December 2019)', submitted 7 January 2020
- 'An inspection of Administrative Reviews (May – December)', submitted 24 January 2020
- 'An Inspection of the Home Office's response to in-country clandestine arrivals ('lorry drops') and to irregular migrants arriving via 'small boats'. (May 2019 – March 2020)', submitted 13 March 2020
- 'Inspection of Country Information – December 2019 Report (Albania, Iran, Vietnam)', submitted 2 April 2020

b. Inspections begun in 2019-20, reports to be completed before 31 October 2020

- 'An inspection of the Home Office's use of language services in the asylum process'
- 'An inspection of the investigation, disruption and prosecution of perpetrators of modern slavery'
- 'An inspection of resettlement schemes'
- 'An inspection of the Home Office's use of sanctions and penalties'
- 'An inspection of Home Office Presenting Officers'
- 'An inspection of BICS intelligence functions, focusing on field officers'
- 'Inspection of Country Information – March 2020 Report (Thematic review of Sexual Orientation, Gender Identity and Expression COI)'

c. New inspections for 2020-21, work to begin before 31 October 2020

- 'An inspection of asylum casework'
- 'A further inspection of the EU Settlement Scheme (EUSS)'
- '[Second] Annual inspection of "Adults at Risk in immigration detention"
- 'An inspection of UKVI's "Front-end Services"
- 'An inspection of e-gates'
- One or two re-inspections (topics and timings to be agreed)

Appendix 5: ICIBI 3-Year Inspection Plan 2017-18 – 2019-20[77]

Theme 1: Protecting the border (identifying and intercepting risks and threats)						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Intelligence	A re-inspection of the Intelligence Functions of Border Force (BF) and Immigration Enforcement (IE) (published 21 July 2016) Possible re-inspection in 2017-18 or 2018-19				**2018-19**: Progress check on the development of the Single Intelligence Platform **2019-20**: Possible re-inspection, to include the work of the National Border Targeting Centre	**2018-19:** Written update provided to ICIBI by Directors General of BF and IE in October 2018. The 'Illegal Working' inspection report (awaiting publication) includes some coverage of IE intelligence functions **2019-20:** No inspection planned, but BF intelligence will be a key feature of BF Freight operations inspection (see below)
Customs Controls	An inspection of Border Force operations at Coventry and Langley postal hubs (March – July 2016) was published 13 October 2016 Possible re-inspection in 2017-18				**2018-19**: 'Light-touch' re-inspection of the original recommendations	**2018-19:** Inspection report sent to Home Secretary in January 2019 (awaiting publication) **2019-20:** No further action planned (subject to the Home Office response to the re-inspection report)
	Border Force Freight operations			●	**2019-20**: Inspection scope and timing subject to agreement on the handling of freight after the UK's exit from the EU	**2019-20:** As planned: work to begin in Q2 (July-September) or Q3 (October-December) (subject to Brexit timing)
Visa applications (crossover with Theme 2)	Visa Decision Making Centre(s) – focusing on the efficiency, effectiveness and consistency of UKVI's visa operations	○	●	●	**2017-18**: Inspection of Croydon and Istanbul published July 2017 **2018-19**: Inspection of "onshoring" of decision making to Croydon and Sheffield **2019-20**: To be decided	**2018-19:** 'Onshoring' (Network Consolidation) inspection began in Q4 (January-March) **2019-20:** Inspection report will be completed and sent to the Home Secretary in Q1 (April-June)

77 As published on the ICIBI website on 2 April 2019 and included in the 2018-19 Annual Report.

Theme 1: Protecting the border (identifying and intercepting risks and threats)						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
UK Seaports and coastline	An inspection of Border Force operations at east coast seaports will be published in April 2017 Possible re-inspection in 2017-18				**2017-18**: Re-inspection of recommendations incorporated into south coast ports inspection	**2019-20:** Re-inspection of recommendations from east and south coast seaports inspections, possibly combined with a west coast ports inspection
	West Coast Ports (to include people and goods entering the UK via the Common Travel Area (CTA))		●		**2019-20**: Deferred from 2018-19; timing subject to agreement on the CTA arrangements after the UK exits the EU	**2019-20:** As planned (subject to Brexit timing and any CTA developments).
	South Coast Ports (to include Dover)	●			**2017-18**: Inspection began in January 2018, due for publication mid-2018	**2018-19:** Inspection report published in November 2018 **2019-20:** See above
	The Border Force Cutter Fleet	○	»	»	**2017-18**: Inspection deferred due to recent Border Force Operational Assurance Directorate review **2019-20**: Possibly include in overview inspection of seaports, incorporating re-inspection of recommendations from previous inspections	**2019-20:** No plan for a separate inspection, but use made of the cutters will feature in any re-inspection of east and south coast seaports
	The National Maritime Intelligence Centre (NMIC) – a standing item in Ports and Cutter Fleet inspections	»	»	»	**2017-18**: NMIC included in scope of south coast ports inspection	**2019-20:** As with the cutters, no plan for a separate inspection, but the contribution of NMIC will feature in any re-inspection of east and south coast seaports
UK Airports	Immigration and customs controls of scheduled international flights	○	○	○	**2017-18**: Inspection of Gatwick (South) published July 2017; Inspection of Stansted published March 2018 **2018-19** and **2019-20**: Programme of inspections of Border Force resourcing at regional UK airports, including service levels	**2018-19:** Inspection of Glasgow and Edinburgh airports piloting new methodology began in Q4. Report will be completed and sent to the Home Secretary in Q1 2019-20 **2019-20:** Possible inspection of regional airport 'cluster' (subject to the success of the pilot)
Border security partnerships	Juxtaposed controls			●	**2019-20**: Inspection scope and timing subject to agreement on the arrangements for juxtaposed controls after the UK's exit from the EU	**2019-20:** As planned, possibly extended to include other 'upstream' work with partner agencies, in particular with European authorities to prevent clandestine departures from the European mainland.

Theme 2: Providing a service (processing applicants, claimants and customers)						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Immigration routes	An inspection of family reunion applications (January – May 2016) was published 14 September 2016 Possible re-inspection in 2017-18				**2018-19**: Re-inspection of family reunion applications, focusing on Amman DMC, due for publication Q1 2018-19 **2018-19** or **2019-20**: Re-inspection of Pretoria Entry Clearance Decision Making Centre	**2018-19:** Amman re-inspection report published September 2018 **2019-20:** Re-inspection to cover the family reunion process as a whole. (NB. The Home Office began 'onshoring' Pretoria applications from March 2019).
	Asylum casework	•		•	**2017-18**: Asylum Intake and Casework inspection published November 2017 **2019-20**: As originally planned, with a possible interim inspection of the Asylum 'new model' office (Bootle) in 2018-19	**2019-20:** As planned. A system-wide inspection in Q3 or Q4 (including the re-inspection of previous recommendations), plus a possible earlier inspection of some discrete elements of the asylum system e.g. use of interpreters, LGBTQI claims
	Points Based System (PBS) visa applications – a standing item in all Visa Post inspections, plus an inspection focusing on treatment of a particular Tier(s) across the system in 2018-19	»	•	»	**2018-19**: Inspection of "Brexit preparedness", focusing on resourcing and processes for the registration and settlement of EU nationals **2019-20**: To be decided, but possibly to include Intra-Company Transfers	**2018-19**: PBS applications received some coverage in the 'Charging for Services' inspection report (awaiting publication). ICIBI's first 'EU Settlement Scheme' inspection report was sent to Home Secretary in March 2019 (also awaiting publication). **2019-20:** PBS applications will feature in the 'Onshoring' inspection.
	Administrative Reviews An inspection of the Administrative Review Processes introduced following the 2014 Immigration Act (Sept – Dec 2015), published 26 May 2016			○	**2017-18**: Re-inspection published July 2017 **2019-20**: Follow-up to 2017 re-inspection, to include an examination of benefits realisation	**2019-20:** As planned, inspection scope to include Admin Reviews of EU Settlement Scheme decisions

Theme 2: Providing a service (processing applicants, claimants and customers)						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Routes to citizenship	Nationality casework – registration of children as British citizens under the British Nationality Act 1981	○			**2017-18**: 'Good character' inspection published July 2017 **2018-19**: 'Light touch' re-inspection	**2018-19:** The re-inspection report, extended to cover operational practice and the new guidance, was sent to Home Secretary in January 2019 **2019-20:** Inspection of the application of the new guidance, and consideration of 'best interests', either as a standalone inspection or as part of a wider children-focused inspection
	An inspection of the General Register Office for England and Wales, with particular emphasis on birth records (March – June 2016), published 13 October 2016 Possible re-inspection in 2017-18				**2019-20**: 'Light touch' re-inspection of 2016 recommendations	**2018-19:** GRO functions were covered briefly in the 'Charging for Services' inspection report sent to the Home Secretary in January 2019 (awaiting publication). **2019-20**: No further action
	Abuse of UK marriage laws for immigration purposes, including marriage fraud				**2018-19** or **2019-20**: Possible 'new' topic for inspection	**2019-20:** To be included in 'Overview' of 'hostile' ('compliant') environment' measures.
Identification and treatment of vulnerable individuals	Children (including the exercise of S. 55 safeguarding duties and 'best interest' judgements) – treatment of children will be a standing item in all relevant inspections	●	»	»	**2017-18**: 'Best interests' inspection published March 2018 **2018-19**: Inspection of the safeguarding of children and young people departing the UK **2019-20**: Possible 'best interests' re-inspection	**2019-20:** Re-inspection of 2017-18 recommendations, extended to include 'new' aspects (e.g. 'Dubs') where relevant **Note:** After preliminary evidence gathering re children departing the UK, this topic has been dropped as the responsible bodies are largely outside ICIBI's remit to inspect.
	Potential Victims of Modern Slavery (in collaboration with the Office of the Anti-Slavery Commissioner) – focusing on in-country identification and treatment An inspection of Border Force's identification and treatment of Potential Victims of Modern Slavery was published 2 February 2017 Possible re-inspection in 2017/18		●		**2019-20**: Deferred from 2018-19, as 'in country' covered by NAO in 'Reducing Modern Slavery', published December 2017. **2017-18**: Re-inspection of 'at the border' identification and treatment published March 2018	**2019-20**: Options for joint inspection will be discussed with the new Independent Anti-Slavery Commissioner (in post from 1 May 2019)

Theme 2: Providing a service (processing applicants, claimants and customers)						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Identification and treatment of vulnerable individuals	Immigration detainees, including the handling of further submissions and the provision of bail accommodation – aligned with HM Inspectorate of Prisons' inspection programme, where possible			•	**2019-20**: As originally planned; scope likely to include some or all of: follow-up actions from the 2018 Shaw Review; availability of post-detention accommodation; application of the Adults at Risk policy; policy, training and practice in relation to Medico-Legal reports/ medical evidence	**2018-19:** Preliminary work on the first annual review of 'Adults at Risk (AaR)' began in Q3, and the inspection began in Q4. The report will be sent to the Home Secretary in 2019-20 Q1. **2019-20:** In-year monitoring by ICIBI, with a possible interim re-inspection report, plus the second annual review of AaR in Q4
	Vulnerable adults, including identification and treatment victims of torture – a standing item in all relevant inspections Domestic Workers visa route	o	»	o	**2017-18**: Inspection began in January 2018, due for publication mid-2018 **2019-20**: Scope to be decided, but may include processes for determining "no recourse to public funds" (NRPF)	**2018-19:** Inspection report published January 2019 **2019-20:** Re-inspection, timing to be agreed (NB. NRPF may fit better in another inspection, or as a standalone topic)
	Women (gender bias) – a standing item in all inspections, plus a themed inspection in 2018-19	»	o	»	**2017-18**: Pregnant women is a focus of the Asylum Accommodation inspection, begun January 2018, due for publication mid-2018 **2018-19**: As planned; scope to take account of findings of Asylum Accommodation inspection	**2018-19:** Asylum Accommodation report published in November 2018 **2019-20:** Possible thematic inspection of Country of Origin information with a focus on women
	Particular social groups – a standing item where relevant, and forming part of the Asylum casework inspection in 2017-18	»	»	»	**2018-19** or **2019-20**: Inspection to focus on treatment of LGBTQI+ individuals	**2018-19:** Treatment of LGBTQI+ individuals featured in the Asylum Accommodation inspection report **2019-20:** Possible LGBTQI+ asylum casework inspection and/or focus on the detention of LGBTQI+ individuals

Theme 2: Providing a service (processing applicants, claimants and customers)						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Service Levels	Service standards (and internal targets) – a standing item in all inspections	»	»	»	**2018-19** and **2019-20**: As originally planned	**2019-20:** Customer Service Standards will be a key feature of the planned Asylum Casework inspection
	Charging for services – covered in relevant inspections, plus a system-wide inspection of in 2018-19		○	»	**2018-19**: As originally planned; scope to include value for money and fee waiver criteria	**2018-19:** The 'Charging for Services' inspection report was sent to Home Secretary in January 2019 (awaiting publication) **2019-20:** Re-inspection/further work dependent on the Home Office's formal response
	Complaints handling will be a standing item in all inspections A re-inspection of Complaints Handling, work began in January 2017, due to report by early May 2017, and to be published by early July 2017	»	»	»	**2017-18**: Re-inspection published in July 2017 **2018-19** and **2019-20**: As originally planned	**2018-19:** An inspection began in February 2019. The report will be completed and sent to the Home Secretary in 2019-20 Q1 **2019-20:** Re-inspection/further work is dependent on ICIBI's findings/Home Office response to 2018-19 inspection
Syrian Refugee Programme	Progress towards the agreed targets and lessons learnt	●			**2017-18**: Report completed March 2018, due to be published Q1 2018-19 **2019-20**: Possible re-inspection	**2019-20:** Possible re-inspection with a focus on integration.

Theme 3: Compliance Management and Enforcement						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Clandestine entrants	A short notice inspection of the Home Office response to 'Lorry Drops' was published 21 July 2016 Possible re-inspection in 2017-18				**2019-20**: Incorporate re-inspection into planned clandestine entrants inspection (see below)	**2019-20:** As planned (see below)
	Clandestine entrants – identification and handling			•	**2019-20**: As originally planned	**2019-20:** As planned, incorporating re-inspection of lorry drops
'Hostile ('Compliant') environment'	Checking of immigration status within civil registration processes – see also Theme 2 'Routes to citizenship'				**2018-19**: Possible 'light touch' re-inspection	**2018-19:** Not started (insufficient resources) **2019-20:** ICIBI unlikely to have sufficient resources for more than a paper-based re-inspection.
	An inspection of the 'hostile environment' measures relating to driving licences and bank accounts (January – July 2016) was published 13 October 2016 Possible re-inspection in 2017-18				**2019-20**: Include re-inspection in Overview	**2019-20:** As planned
	An inspection of the implementation of the 2014 'hostile environment' provisions for tackling sham marriage was published 15 December 2016 Possible re-inspection in 2017-18				**2019-20**: Include re-inspection in Overview	**2019-20:** As planned
	Landlord immigration checks	•			**2017-18**: 'Right to Rent' inspection published March 2018. **2019-20**: Include re-inspection in Overview	**2019-20:** As planned
	National Health Service charging	○			**2018-19**: Inspection deferred from 2017-18, due to insufficient ICIBI capacity	**2018-19:** Covered in 'Collaborative working with other government departments' inspection. Report published in January 2019 **2019-20:** Include in Overview
	Illegal working		•		**2018-19**: As originally planned, or possibly to begin in Q1 2019-20	**2018-19:** Inspection report sent to the Home Secretary in February 2019 (awaiting publication)

Theme 3: Compliance Management and Enforcement						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
'Hostile ('Compliant') environment'	Overview of 'hostile ('compliant') environment' measures			○	**2019-20**: Timing as originally planned, but likely to be a bigger piece of work than envisaged	**2019-20:** As planned, but the timing needs to take account of the 'Windrush Lessons Learned' review, and the scope may include a re-inspection of 'Collaborative working with other government departments'.
	Status reviews – revocation of leave to remain and deprivation of citizenship	○			**2019-20**: Possible 'light touch' re-inspection	**2019-20:** Considerable public interest in deprivation on National Security grounds, but any report is likely to be heavily redacted, so of limited value. A paper-based re-inspection of non-NS casework may be possible.
Contact management	An inspection of reporting arrangements, including the work of Reporting Centres, work began in December 2016, due to report by mid-May 2017, and to be published by early July 2017 Reporting arrangements, including Reporting Centres			●	**2017-18**: Inspection brought forward (at the Home Secretary's request), published November 2017 **2019-20**: Re-inspection	**2018-19:** A combined Foreign National Offenders/Reporting and Offender Management re-inspection report was sent to the Home Secretary in January 2019 (awaiting publication) **2019-20:** The above identified several 'open' recommendations from the 2017-18 report, so a further 'light touch' re-inspection before the end of 2019-20 may be worthwhile
	'Helplines' (and published guidance)		○		**2018-19**: As originally planned, or possibly to begin in early 2019-20	**2018-19:** Deferred on advice from Director General UKVI in light of changes planned in 2018-19 Q3. Covered briefly in 'EU Settlement Scheme report'. **2019-20:** Possibly include in Overview of 'hostile ('compliant') environment' measures or in an inspection of Guidance (see Theme 4)

Theme 3: Compliance Management and Enforcement						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Removals	An inspection into failed right of abode applications and referral for enforcement action, published 13 October 2016 Possible re-inspection in 2017-18				**2019-20**: Possible 'light touch' re-inspection	**2019-20:** As planned, but ICIBI is unlikely to have sufficient resources for more than a paper-based re-inspection.
	An inspection of Removals, focusing on Foreign National Offenders, work began in January 2017, due to report by late May 2017, and to be published by late July				**2017-18**: Inspected (at the Home Secretary's request), report published November 2017. **2019-20**: Re-inspection	**2018-19:** Combined FNOs/ROMs re-inspection report sent to the Home Secretary in January 2019 **2019-20:** FNOs will feature in the 'Adults at Risk' (AaR) annual review. Removals (logistics, stats) could form part of an AaR (detained casework) in-year inspection
	Migration Removals Pool (MRP), Voluntary Returns, Family Returns, and Emergency Travel Documents (last inspected 2015)		•		**2019-20**: Defer from 2018-19 and combine with the Overview of 'hostile environment' measures	**2019-20:** As planned, but possibly better incorporated into an AaR (detained casework) in-year inspection
Exit checks	Exploitation of exit check data across the border and immigration systems (including planning and implementation of Exit Check project), included as a standing item where relevant from Year 2	•	»	»	**2017-18**: Inspection published March 2018 **2019-20**: Re-inspection	**2019-20:** Re-inspection as planned, but possibly incorporated into the Overview of 'hostile ('compliant') environment' measures
Sanctions and Penalties	Completeness, consistency of application, deterrent effect of sanctions and penalties (including, but not limited to, the 'hostile environment' measures above), a standing item where relevant	»		o	**2019-20**: As originally planned	**2018-19:** Some coverage in 'South Coast Seaports' and 'Illegal Working' inspection reports **2019-20:** As planned

Theme 4: Working with others						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
'Hand-offs' between Home Office Directorates	Alignment of border and immigration processes and priorities – a standing item for all inspections, plus an inspection of any 'new' major processes at an early stage, plus an inspection of HM Passport Office and/ or General Register Office in Year 2 where their functions overlap or join border and immigration functions	»	●	●	**2018-19**: Defer HMPO/GRO/UKVI overlap inspection to focus on preparations for the UK's exit from the EU and the consequences for BICS 'business as usual' **2019-20**: To be decided, possibly re-instate HMPO/GRO/UKVI overlap inspection	**2018-19:** 'Hand-offs' between and within directorates featured in a number of completed inspection reports, while the 'EU Settlement Scheme' report covered a 'new' major process. 'Charging for Services' looked briefly at HMPO, as did 'Good character'. **2019-20:** Inspections of the 'EU Settlement Scheme' and of 'Asylum Casework' will provide opportunities to examine the question of alignment of processes and priorities.
	Forecasting, planning, contingency planning – a standing item for all inspections, plus a re-inspection of the planning for (and management of) a summer 2016 asylum 'surge' under Theme 5	»	»	○	**2018-19**: Bring forward from 2019-20 and run alongside workforce planning inspection (see Theme 5)	**2018-19:** ICIBI had insufficient resources to carry out the planned inspection **2019-20:** There is significant stakeholder interest in Border Force planning/resourcing for summer 2019, but Brexit and the 2019 Comprehensive Spending Review risk an inspection being nugatory
	'Onshoring' (to the UK) of immigration functions and remote decision-making	○			**2017-18**: Deferred due to delays in roll out **2018-19**: Inspection of "onshoring" of decision making to Croydon and Sheffield (see under Theme 1); to include document handling between overseas posts and UK Decision Making Centres.	**2018-19:** An inspection of 'Onshoring' (Network Consolidation) began in Q4. The report will be completed and sent to the Home Secretary in 2019-20 Q1 **2019-20:** Any further work is dependent on the findings and response to recommendations from the above report

Theme 4: Working with others						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Partnerships	Other Government Departments (OGDs) and Local Authorities – alignment of priorities and responsibilities, information sharing, plus a comparison of similar functions e.g. DWP, HMRC processing of bulk data, contact management	•			**2017-18**: Inspection begun February 2018, due for publication mid-2018	**2018-19:** The inspection report was published January 2019 **2019-20:** A re-inspection of the recommendations from the above may be incorporated into the Overview of 'hostile environment' measures
	Law Enforcement – information sharing and collaborative working		•		**2019-20**: Deferred from 2018-19; to include a re-inspection of Operation NEXUS.	**2018-19:** The relationship between BICS directorates and law enforcement agencies featured in the 'South Coast Seaports', 'Collaborative working with OGDs', 'Postal Hubs', 'FNOs/ROMs', and 'Illegal Working' inspection reports **2019-20:** A paper-based re-inspection of NEXUS may be possible
	Overseas partners and stakeholders – relationship management, information sharing, comparative performance			•	**2019-20**: As originally planned, possible focus on Immigration Enforcement International (formerly RALON)	**2019-20:** ICIBI is unlikely to have sufficient resources for a standalone inspection, but may examine this in in the context of removals (including of vulnerable individuals e.g. PVoMS) and processes for obtaining Emergency Travel Documents (ETDs)

Theme 4: Working with others						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Commercial contracts	National/strategically significant (Home Office 'Tier 1') contracts – performance/delivery management, alignment with in-house border and immigration functions		●		**2017-18**: Asylum Accommodation inspection (begun in January 2018, due to be published mid-2018) – brought forward from 2018-19 in response to Home Affairs Committee report	**2018-19:** The 'Asylum Accommodation' inspection report was published in November 2019 **2019-20:** Contracts will feature in the 'Adults at Risk' annual review, and in a possible 'Asylum Accommodation' re-inspection after new contracts/providers are in place.
	Regional or Local ('Tiers 2 and 3') contracts – Home Office visibility, plus performance/delivery management	●			**2019-20**: Deferred from 2017-18 to make room for Asylum Accommodation inspection (above); possibly to include NGO contracts	**2019-20:** ICIBI is unlikely to have sufficient resources for a standalone inspection
	Overseas contracts, for example Visa Application Centres (VACs) – a standing item in all Visa Decision Making Centre inspections		»	»	**2018-19** and **2019-20**: As originally planned	**2018-19:** Touched on in the 'Charging for Services' report **2019-20:** VACs will feature in the 'Onshoring' (Network Consolidation) inspection and the Family Reunion re-inspection, but this may not be sufficient to satisfy stakeholder interest in this topic
'Joint' Inspections	Collaborations with other Inspectorates and similar bodies (including short-term attachments, input to inspections and, where relevant, joint or complementary inspections)	○	○	○	**2017-18**: ICIBI supported HMICFRS inspection in Guernsey **2018-19**: Possible support to HMICFRS inspection in Jersey **2019-20**: To be decided	**2019-20:** ICIBI (minus HMICFRS) has been requested by States of Jersey to assist with an inspection of its immigration and customs services. This requires a relatively small/short-term commitment, but may still be beyond ICIBI's capacity

Theme 5: Learning and improving						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Country of Origin Information	Country of Origin (CoI) Reviews – 10-12 reviews per year focused on the countries and issues featuring most commonly in Asylum claims – reviews are commissioned and quality assured by the Independent Advisory Group on Country Information	○	○	○	**2017-18**: See Annual Report **2018-19** and **2019-20**: As originally planned	**2018-19:** One IAGCI report was published in December 2018, a second was sent to the Home Secretary in March 2019 (awaiting publication). **2019-20:** As planned
	Production, usefulness and use made of CoI material within the Home Office – to include an assessment of the ICI's process for delivering CoI reviews	●			**2017-18**: Inspection published January 2018 **2019-20**: Re-inspection in parallel with Asylum Casework inspection, meanwhile monitor through COI reviews	**2019-20:** Re-inspection as planned, possibly aligned with Asylum inspection
Litigation	Handling of litigation cases, including the work of Presenting Officers – inspection combined with Organisational Learning	●			**2017-18**: Inspection published January 2018, but Presenting Officers were set out of scope **2019-20**: Inspection of the work of Presenting Officers	**2019-20:** see below
	Organisational learning from litigation cases, including Pre-Action Protocol (PAP) letters, Judicial Reviews, allowed appeals – then included as a standing item in relevant inspections		»	»	**2017-18**: See above **2018-19**: Possible re-inspection of 2017-18 Learning from Litigation inspection	**2019-20:** Re-inspection as planned, but possibly combined with an inspection of the Presenting Officer (PO) function, including the use by POs of COI material and actions/learning from concluded appeals
	Non-suspensive appeals – a standing item where relevant, plus a thematic inspection in 2019-20	»	»	○	**2019-20**: As originally planned	**2019-20:** Possibly incorporate into an inspection of Removals
Staff	Type of staff (permanent, temporary, agency), grades/responsibility levels, provision of initial and refresher/top-up training, knowledge, experience, engagement – a standing item in all inspections	»	»		**2018-19**: Workforce planning across BICS ('right skills, right place, right time'), including for the UK's exit for the EU – a major piece of work requiring significant resources **2019-20**: Re-inspection	**2018-19:** A 'Workforce planning' inspection was not possible (insufficient resources), but staffing was a key feature of the 'South Coast Seaports' (BF) and 'EU Settlement Scheme' (UKVI) reports, and 'Vulnerable Adults' looked at training across BICS. **2019-20:** The 'lessons learned' from BF resourcing for Brexit and UKVI resourcing of the EU Settlement are possible topics for inspection, while staff training will feature in the planned 'Asylum Casework' inspection.

Theme 5: Learning and improving						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Tools/Technology	Operating Mandates, Instructions, Guidance, Quality Assurance – clarity, accessibility, use etc. – a standing item in all inspections, plus a thematic inspection in 2018-19	»	●	»	**2018-19** (or early **2019-20**): Inspection to complement the workforce planning inspection	**2018-19:** Guidance featured in all completed inspection reports, most of which also looked at quality assurance **2019-20:** As for 2018-19, this will feature in all inspections, but it is unlikely ICIBI will have sufficient resources for a major standalone inspection.
	Data/Management Information, record keeping – a standing item in all inspections, plus a thematic inspection in 2019-20	»	»	●	**2019-20**: Inspection to include review of ATLAS (the new caseworking system) implementation	**2018-19:** The quality and completeness of data/ MI featured in all completed inspection reports **2019-20:** As planned, subject to ATLAS progress
	Digital services at the border – a standing item in relevant inspections, plus a thematic inspection in 2018-19	»	●	»	**2018-19**: As originally planned	**2018-19:** Deferred following discussion with the Home Office regarding progress in developing DSAB **2019-20:** Keep under review, but unlikely to have advanced sufficiently during 2019-20 to be inspected
Re-inspections	Check on the implementation of accepted Recommendations after c. 6+ months or earlier if the Home Office has committed to an earlier implementation date – 6 re-inspections per year	●	●	●	**2017-18:** 5 re-inspections published; all other inspections incorporated re-inspection points where relevant **2018-19 and 2019-20:** As originally planned	**2018-19:** One re-inspection report was published and re-inspection points were also included in all inspections where relevant. Three further re-inspection reports were sent to the Home Secretary in 2018-19 Q4 (awaiting publication) **2019-20:** As planned

Home Secretary Commissions						
Area	**Topic**	**17-18**	**18-19**	**19-20**	**Updated Plan as at April 2018**	**2018-19 update and 2019-20 Plan**
Not known in advance	S. 50 of the UK Borders Act 2007 enables the Home Secretary to request the ICI to report in relation to a specified matter.	●	●	●	**2018-19 and 2019-20:** As originally planned (merge with planned inspections where possible)	**2018-19:** 'Adults at Risk' annual review commissioned. First report will be completed and sent to the Home Secretary in 2019-20 Q1 **2019-20:** 'Adults at Risk' annual review, plus a possible 'Windrush Lessons Learned' implementation review

Key

● an inspection that is likely to require significant resources (for planning purposes estimated at 350 days) and take 20 weeks to complete

○ an inspection that is likely to require more limited resources (for planning purposes estimated at 200 days) and may be completed in less than 20 weeks

» a standing item that will be covered, where possible, in all relevant inspections

Appendix 6: 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 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 o 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)

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