



HM Government

# The Response to the Windrush Lessons Learned Review:

A Comprehensive Improvement Plan

September 2020

CP 293



# The Response to the Windrush Lessons Learned Review:

A Comprehensive Improvement Plan

Presented to Parliament by the  
Secretary of State for the Home Department  
by Command of Her Majesty

September 2020



© Crown copyright 2020

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at [www.gov.uk/official-documents](https://www.gov.uk/official-documents)

Any enquiries regarding this publication should be sent to us at [WindrushReviewImplementationTeam@homeoffice.gov.uk](mailto:WindrushReviewImplementationTeam@homeoffice.gov.uk)

ISBN 978-1-5286-2136-6  
CCS0820050750 09/20

Printed on paper containing 75% recycled fibre content minimum

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

# Contents

Foreword by the Home Secretary	3
Introductory Remarks by the Permanent Secretary and Second Permanent Secretary	4
Executive Summary	6
Section 1: Introduction	13
Section 2: The Five Themes Guiding Our Response	14
<b>Theme 1: Righting the Wrongs and Learning from the Past</b>	<b>14</b>
Recommendation 1 – Provide a sincere apology	15
Recommendation 2 – Publish a comprehensive improvement plan	15
Recommendation 3 – Run reconciliation events	15
Recommendation 4 – Continue the Windrush Scheme and outreach	16
Recommendation 5 – Be more proactive in identifying those affected	17
Recommendation 6 – Implement a learning plan on UK history	18
Recommendation 16 – Establish a repository for recommendations	19
<b>Theme 2: A More Compassionate Approach</b>	<b>21</b>
Recommendation 7 – Review the compliant environment	22
Recommendation 14 – Set a clear purpose, mission, and values statement	23
Recommendation 15 – Implement a programme of major cultural change	24
Recommendation 17 – Develop ethical standards and a decision-making model	25
Recommendation 18 – Improve guidance on the burden and standard of proof	26
Recommendation 19 – Improve UKVI customer contact, service, performance and assurance	27
<b>Theme 3: Robust and Inclusive Policymaking</b>	<b>31</b>
Recommendation 11 – Improve historical understanding of immigration legislation	32
Recommendation 12 – Deliver Equality Act and Human Rights Act training	33
Recommendation 13 – Improve Impact Assessments	34
Recommendation 21 – Consolidate immigration statute law	35
Recommendation 22 – Better spot trends and improve knowledge and records management	36
Recommendation 24 – Invest in training for senior officials on advising ministers	36
Recommendation 25 – Improve submissions for ministers and Permanent Secretaries	37
Recommendation 26 – Create a central archive to record submissions and minutes	38
<b>Theme 4: Openness to Scrutiny</b>	<b>40</b>
Recommendation 8 – Improve external understanding and engagement	41
Recommendation 9 – Introduce a Migrants’ Commissioner	42

Recommendation 10 – Review the remit and role of the Independent Chief Inspector of Borders and Immigration (ICIBI)	42
Recommendation 20 – Commission a review of the Borders, Immigration Citizenship and System (BICS) complaints procedure	43
Recommendation 23 – Revise and clarify the risk management framework	43
<b>Theme 5: An Inclusive Workforce</b>	<b>45</b>
Recommendation 27 – Establish a strategic race advisory board	46
Recommendation 28 – Revise the diversity & inclusion strategy	46
Recommendation 29 – Review diversity and inclusion and unconscious bias training	47
Recommendation 30 – Review successful employment tribunal claims	48
Annex A: The Windrush Cross-Government Working Group	50
Annex B: Glossary	51

# Foreword by the Home Secretary

The Windrush Lessons Learned Review exposed institutional failings at the heart of the Home Office. A culmination of practices under successive governments allowed ‘institutional ignorance and thoughtlessness towards the issue of race and the history of the Windrush generation’ to fester.

I have confronted these shameful findings head on, taking swift and decisive action to make amends and to build a better Home Office. We continue to work to support those who were so badly let down by the Windrush scandal, and I am working at pace to transform the culture within the department that allowed it to happen.



I have listened to the Independent Adviser to the Windrush Lessons Learned Review, Wendy Williams, and accepted her findings. I have apologised unreservedly for the failures of the past, and I am leading an unprecedented programme of change to ensure the Home Office truly represents all the parts of the community it serves.

This response to the Windrush Lessons Learned Review sets out how we are acting on each of the issues it raised. Much of this work is already underway, and we are liaising closely with Wendy Williams, community leaders, and the Windrush Cross-Government Working Group to get it right. I am grateful for the assistance of Bishop Webley and all those who represent the Windrush generation in helping to shape our response.

Today, the Home Office is already a very different place. We are listening to community leaders and organisations and urgent change is underway, but we are not complacent. We are addressing issues that have built up over decades, and the full root and branch reforms I want to see will not happen overnight. My commitment is long term. We will continue to listen and act carefully over the months and years ahead to build a Home Office fit for the future, one that serves every corner of society.

My ambition is to build a fairer, more compassionate, Home Office that puts people first and sees the ‘face behind the case’. In addition to my ministerial team, our dedicated staff are working with me to deliver the results we all want to see. I expect to see nothing less than a total transformation of our culture which includes our leadership, working practices, and how we develop and deliver our policies.

I want the Home Office to be striving for equality, fairness and people-focused policies. That means doing more than just enough, and we intend to go further to deliver meaningful and lasting change across the entire department and the rest of government.

My resolve to deliver for the Windrush generation and their descendants is absolute. When Wendy Williams returns to the Home Office to review progress in twelve months’ time, I am confident she will find the start of a genuine cultural shift and a department that is working hard to be more diverse, and worthy of the trust of the communities it serves.

A handwritten signature in black ink, appearing to read 'P. Patel'.

**Rt Hon Priti Patel MP**  
Home Secretary

# Introductory Remarks by the Permanent Secretary and Second Permanent Secretary

As the Civil Service leaders of the Home Office, we want to reiterate our own unreserved apologies for the appalling mistreatment that some members of the Windrush generation suffered as a result of the policies and actions of this department. They had and have every right to be here in the UK. Their treatment was inexcusable, and we are truly sorry.



The Windrush Lessons Learned Review examined exactly what happened, why it happened, and recommended actions to help ensure that nothing like these injustices can ever happen again. We are grateful for the invaluable work of Wendy Williams, her team, and those who shared their experiences.

Wendy Williams' findings on 'institutional ignorance and thoughtlessness on issues of race' would be unacceptable in any organisation, but are especially so in this department. Every aspect of our policy and operational decisions – from citizenship and immigration to policing and national security – requires us to be conscious of the impact of race, history and the cultural considerations on all of us, and particularly those from black, Asian, and minority ethnic communities.

We have taken the lessons to heart. The memory of the Windrush scandal will remain a difficult one for the Home Office for many years, but we will turn this into a focused and meaningful response. We are committed to leading transformative change over the coming months and years to create a department of which colleagues, ministers, and the communities we serve can be proud. This requires a fundamental shift in our culture as well as change across the entire department.

This response sets out our vision for the Home Office as part of our mission to build a safe, fair, and prosperous UK. We will right the wrongs and learn from the past. We will be open to scrutiny. We will ensure that our policymaking is inclusive and robust. We will make every effort to ensure our workforce and culture are inclusive. And we will ensure that we have a more compassionate approach that looks at people, not cases. There is a clear role for us as civil servants to advise and ensure that ministers, now and in the future, have a good understanding of, and have considered the lessons from, the Windrush Lessons Learned Review. We, the Home Secretary and the ministerial team, are clear that civil servants have a responsibility to tell ministers and colleagues what they need to hear, not what we think they would like to hear.

Success requires a collaborative effort. We are heartened that Wendy Williams recognised that the vast majority of our colleagues across the Home Office, at all grades, are committed to public service and many demonstrate excellence in what they do on a daily basis. The responses from colleagues following the scandal, including many of those whose families, friends and communities have been personally affected, demonstrate that what happened to the Windrush generation was unacceptable for all of us. We are committed to supporting all Home Office staff to achieve excellence consistently, as Wendy Williams has asked of us.

We are particularly grateful to our Windrush volunteers – colleagues who have offered insights about their communities to those working in the immigration and citizenship system. They have continued to share their experiences with colleagues across the department, who have in turn held conversations in their teams about the Windrush scandal and how they can apply lessons to their work on issues as diverse as serious and organised crime, modern slavery, policing, and counter-terrorism. We have also shared lessons with and sought to learn from colleagues across the Civil Service, as the Review’s findings have relevance to all departments.

We will go beyond the recommendations and will continue to act quickly where we can and where the public rightly expects us to do so. We will keep the long-term focus on wholesale and lasting cultural change. A key lesson is about openness to scrutiny and we hope that this document meets that goal. We look forward to receiving the responses from the public and from colleagues to help us understand how we can go still further.



Matthew Rycroft CBE  
**Permanent Secretary**  
**Home Office**



Shona Dunn  
**Second Permanent Secretary**  
**Home Office**

# Executive Summary

## The Windrush scandal

1. The arrival of the HMT Empire Windrush on 22 June 1948 marked a significant moment in the modern history of the United Kingdom – the beginning of the arrival of hundreds of thousands of people who came from the Caribbean and beyond to help rebuild our economy and country after World War 2.
2. However, for some members of that generation, as well as for some people arriving from other countries, serious mistakes by successive governments meant that changes in the law and immigration policy combined with ignorance, thoughtlessness, and other significant failings on the part of the Home Office resulted in hundreds of people being caught up in what has become known as the Windrush scandal.
3. People – who for decades had rightly identified as British and were here legally, but who did not have evidence to demonstrate their immigration status, often because they were unaware this needed to be done – were treated as if they were here illegally, with appalling consequences. Their future in the UK was called into question. Some people were denied a right to work, to rent homes and to access NHS services and care. Others were detained and even removed from the UK.

## Our immediate response

4. The failings that led to the Windrush scandal should never have happened. Since these injustices came to light, the Home Office has worked tirelessly to right the wrongs suffered by members of the Windrush generation. **We have offered practical help to those affected, as well as compensation, support and reassurance**, and the Home Office continues to work closely with communities to identify those affected and to resolve their status and compensate those that have suffered impacts and losses as swiftly as reasonably possible.
5. The Home Office has already helped thousands of people under these measures, which include setting up a **Taskforce** to help people resolve issues relating to demonstrating their status. The Taskforce, now known as the **Windrush Help Team**, supports people to apply for documentation, or British citizenship if eligible, for free under the **Windrush Scheme**. As of the end of August 2020, over 13,300 documents have been provided to over 11,500 individuals confirming their status or British citizenship.
6. A dedicated **Vulnerable Persons Team** (VPT) provides specialist support to members of the Windrush cohort, including financial support through urgent and exceptional circumstances. To the end of August 2020, the VPT had provided support to 1,568 individuals, and there are 129 cases currently receiving support.
7. The **Windrush Compensation Scheme** was launched in April 2019 to provide compensation to those who suffered loss because they could not demonstrate their lawful right to live in the UK. The statistics published on 28 September 2020, covering up to the end of August, showed that 1,531 claims had been received, with payments made on 168 of those claims, totalling over £1.3m. At that point, a further £1.2m had been offered in compensation (either awaiting acceptance or subject to a review request). Whereas the first £1m took 14 months to be offered, the second £1m was offered in less than two months and the scheme has now offered over £2.5m.

## The Windrush Lessons Learned Review

8. The then Home Secretary, Sajid Javid, commissioned a review on 2 May 2018 to investigate the circumstances surrounding the scandal, and to determine what action was needed to prevent anything similar happening again. On 21 June 2018, he asked Wendy Williams, Her Majesty's Inspector at Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), to oversee the Windrush Lessons Learned Review.
9. Wendy Williams submitted the Windrush Lessons Learned Review to the Home Secretary on 18 March 2020, and it was published the following day. It is available online at [GOV.UK](https://www.gov.uk). The detailed and thorough Review sets out what happened, why it happened, the Home Office's initial corrective measures, and key findings and recommendations. The Review makes thirty specific recommendations, which are set out in Section 2 of this report.
10. The central recommendations were that the Home Office must "acknowledge the wrong which has been done; it must open itself up to greater scrutiny; and it must change its culture to recognise that migration and wider Home Office policy is about people and, whatever its objective, should be rooted in human dignity". Wendy Williams also identified an "institutional ignorance and thoughtlessness towards the issue of race and the history of the Windrush generation".

## Our response to the review

11. The Home Secretary accepted the findings in the Windrush Lessons Learned Review on 23 June 2020. She noted that "there are serious and significant lessons for the Home Office to learn in relation to the way the Department operates" and promised that the response would present a new, positive, and constructive chapter for the Home Office.
12. This document sets out the Home Office's Comprehensive Improvement Plan in response to the Windrush Lessons Learned Review. We have organised the review's thirty recommendations into five broad and connected themes to help ensure the sweeping reforms to culture, policies, systems and working practices reach across the entire department.
13. **Theme 1: Righting the Wrongs and Learning from the Past** means being open-minded and willing to acknowledge, explore and put right our mistakes, including using that learning to inform our future work. Success will mean that public trust and confidence in the department is rebuilt. We want the public to see and agree that we are genuinely listening to communities and experts and acting on what we hear.
14. The recommendations included in Theme 1 are:
  - **Recommendation 1: Provide a sincere apology.** The Home Secretary provided an unqualified apology on behalf of successive governments on 19 March 2020.
  - **Recommendation 2: Publish a comprehensive improvement plan.** We are publishing this Comprehensive Improvement Plan now. Wendy Williams will return to review progress in September 2021.

- **Recommendation 3: Run community events.** We are planning to hold events to listen and learn from the past, reset relations with the community, and celebrate the contribution of the Windrush generation in order to build for the future. We are working with the Cross-Government Windrush Working Group to design the events which will be implemented in early 2021.
  - **Recommendation 4: Continue the Windrush Scheme and outreach.** There are no plans to disband the Windrush Scheme. The Windrush Compensation Scheme will remain open for claims until at least 2023. Outreach work will continue.
  - **Recommendation 5: Be more proactive in identifying those affected.** We are doing all that we can to proactively identify those people affected, including through extensive external and community engagement.
  - **Recommendation 6: Implement a learning programme on UK history.** We are developing a historical guide to identify the roots of the Windrush scandal, have held talks with staff to explore the Home Office's history, and aim to have a history training programme in place from June 2021.
  - **Recommendation 16: Establish a repository to track progress on recommendations.** We are testing new software to act as a repository to track progress on external and internal recommendations. This is expected to be fully operational by September 2021.
15. **We are going further still in this theme**, including setting up Windrush cross-government roundtable discussion groups, bringing together senior representatives from different government departments to share lessons on a range of topics highlighted as part of the Windrush Lessons Learned Review. The discussions are designed to share expertise and improve how government can put individual people at the heart of our work.
16. We will continue to work with the Windrush Cross-Government Working Group, co-chaired by the Home Secretary and Bishop Derek Webley, alongside the Commission on Race and Ethnic Disparities. Both the Working Group and the Commission will play a critical role in supporting the design and delivery of practical solutions to address the wider challenges that disproportionately affect people from black, Asian and minority ethnic backgrounds.
17. **Theme 2: A More Compassionate Approach.** We will ensure that we put people first, and that our work takes proper account of the complexity of citizens' lives, so that we make the right decisions. Success will mean positive cultural change and bringing a human face to the Home Office. When people interact with the department, regardless of decision outcomes, they will receive a good customer experience rooted in respect, dignity and humanity.
18. The recommendations included in Theme 2 are:
- **Recommendation 7: Review the compliant environment.** We will carry out a full review and evaluation of the compliant environment policy and measures, individually and cumulatively. This work will be underpinned by three key principles to ensure our policies deliver the desired objectives: regular assessments of completed evaluations/reviews, ongoing external engagement and transparency, and being open to change.

- **Recommendation 14: Set a clear purpose, mission and values statement.** The new mission for the Home Office – “Building a safe, fair, and prosperous UK” – has already been set. We will publish a clear statement of our purpose, mission, and values later this autumn.
  - **Recommendation 15: Implement a programme of major cultural change.** We are developing a programme of cultural change led by the Permanent Secretaries. The programme will be designed by the end of January 2021 and implemented by the end of that year.
  - **Recommendation 17: Develop ethical standards and a decision-making model.** We are testing various approaches to ethical decision-making, following which we will develop and publish an ethical decision-making model, linked to the new Home Office values.
  - **Recommendation 18: Improve guidance on the burden and standard of proof.** We are taking this work forward as part of the evidential requirements strand of the Simplification of the Rules Programme, which aims to consolidate and simplify the immigration rules. We will change the culture of decision-making so that decision-makers feel confident and supported to use their discretion.
  - **Recommendation 19: Improve UK Visas and Immigration (UKVI) customer contact, service, performance and assurance.** We have improved how we identify and escalate risk, developed a strategy to better understand customers and their needs, and are implementing a strategy that will provide more effectiveness and customer interaction throughout the immigration application process. We will bring a consistent approach to vulnerability across all Borders, Immigration, and Citizenship System (BICS) operational areas. We have already published the UKVI assurance strategy, which will expand to more areas.
19. **We are going further still in this theme**, including through the work of the **UKVI Chief Caseworker Unit** and **Professionalisation Hub**. We have developed a ‘Face Behind the Case’ mandatory training course that has already launched. We are seeking to professionalise casework, and are piloting a ‘licence to operate’ to ensure that decision-makers have the skills and capability required to do the job to a high standard and that this is tested and recognised.
20. **Theme 3: Inclusive and Rigorous Policymaking.** We will put in place systems and support to enable staff at all levels to make, evaluate and improve evidence-based policy that is thorough, rigorous, and promotes equality. Success will mean that policymakers routinely consider the lessons from the Windrush Lessons Learned Review in developing policy, so that advice to ministers is well-informed by history and the experiences of the department, and is inclusive, robust, and considerate of the impact on individuals from all backgrounds.
21. The recommendations included in Theme 3 are:
- **Recommendation 11: Improve historical understanding of legislation.** We will train immigration officials in the history of nationality and immigration legislation during 2021 and we will improve how ‘informal’ knowledge is shared between officials.
  - **Recommendation 12: Deliver Equality Act and Human Rights Act training.** We set up a Public Sector Equality Duty team in 2019 to deliver training to officials and help them to understand their Public Sector Equality Duty obligations. We aim to have trained Senior Civil Servant policymakers by spring 2021.

- **Recommendation 13: Improve Impact Assessments.** We have introduced new training to improve the quality and rigour of Impact Assessments. There are now mandatory requirements to address the Public Sector Equality Duty in all published Regulatory Impact Assessments for legislation.
  - **Recommendation 21: Consolidate immigration statute law.** We are discussing with the Law Commission how and when to consolidate immigration legislation. In the meantime, we are continuing to simplify the Immigration Rules.
  - **Recommendation 22: Better spot trends and improve records and knowledge management.** We are making better use of our existing data and strengthening our capability to capture, analyse, and act on what we find, including staff tacit and embedded knowledge.
  - **Recommendation 24: Invest in training for senior officials on advising ministers.** To build on the training already available, we will review Senior Civil Servants' learning and development needs by November 2020, and will introduce any new changes required from June 2021.
  - **Recommendation 25: Improve submissions for ministers and Permanent Secretaries.** We have changed the submissions template to ensure all core briefings to ministers show consideration of the Public Sector Equality Duty. We are reviewing how and when major policy submissions are escalated to Permanent Secretaries for approval. We are consulting on the definition of vulnerability to use internally.
  - **Recommendation 26: Create a central archive to record submissions and minutes.** Over 8,000 staff now use a new electronic archive to record all submissions, minutes and notes. The aim is for all staff to use this system within the next year.
22. **We are going further still in this theme**, through launching the Policy Profession Policy Tests to help policy makers easily and routinely incorporate best practice across government and lessons from the Windrush Lessons Learned Review in future advice. We will also address any recommendations made by the Equality and Human Rights Commission following its investigation into compliance with the Public Sector Equality Duty in relation to what was known at the time as the hostile environment.
23. **Theme 4: Openness to Scrutiny:** We will become more outward facing and we will listen to, and act on, the views of and challenges from both staff and external stakeholders. Success will mean a fundamental cultural shift in the department's attitude to those with different views and major improvements to how policy is formulated.
24. The recommendations included in Theme 4 are:
- **Recommendation 8: Improve external understanding and engagement.** We plan to train staff on community engagement and are learning from staff who assisted in public engagement as "Windrush volunteers". We plan to conduct a regular stakeholder survey to better understand the effectiveness of our engagement.
  - **Recommendation 9: Introduce a Migrants' Commissioner.** We are consulting with the Windrush Cross-Government Working Group to recommend how best to advance this recommendation, including which external voices to engage with.

- **Recommendation 10: Review the remit and role of the Independent Chief Inspector of Borders and Immigration (ICIBI).** We plan to carry out a full review of the ICIBI in the first quarter of 2021 and will use these findings to consult on changes to the ICIBI.
  - **Recommendation 20: Commission a review of the BICS complaints procedure.** We are working with the Government Internal Audit Agency to develop terms of reference for an independent review of the complaints system and advise on improvements, including how best to establish an Independent Complaints Examiner function.
  - **Recommendation 23: Revise and clarify the risk management framework.** We have re-launched a department-wide Risk and Assurance Forum and we hope to formally launch a new risk management framework in December 2020 so that staff at all levels have the knowledge and responsibility to act upon risks that are identified.
25. **We will go further still in this theme** by establishing a Community and Stakeholder Engagement Hub to lead the Home Office's external engagement while providing a centre of excellence for knowledge and expertise to upskill the department.
26. **Theme 5: An Inclusive Workforce:** We will promote greater diversity in the department, becoming more representative of the communities we serve at all grades, nurturing talent and ensuring action is taken to offer equality of opportunity. Success will mean a more diverse workforce and a better understanding – among our staff – of the importance of diversity and inclusion in our interactions with each other and in the work that we deliver for the diverse UK population. This will in turn lead to improved leadership, decision making and overall governance.
27. The recommendations included in Theme 5 are:
- **Recommendation 27: Establish a strategic race advisory board.** We have refreshed the membership and terms of reference of our existing Race Board. We will recruit additional external experts with a range of perspectives and aim to convene the newly revised strategic race advisory board in autumn this year.
  - **Recommendation 28: Revise the diversity and inclusion strategy.** We will completely overhaul our existing diversity and inclusion strategy by creating a new strategy that will include better plans for accomplishing our ambition to lead the way in the field of diversity and inclusion. Drawing from commitments in the race action plan, we will publish a plan to address senior-level black, Asian and minority ethnic under-representation by the end of 2020.
  - **Recommendation 29: Review diversity and inclusion and unconscious bias training.** We will develop a new diversity and inclusion training programme, over and above the existing mandatory Civil Service e-learning, by autumn 2021. We will conduct a training needs analysis to understand capability and needs across the department.
  - **Recommendation 30: Review successful employment tribunal claims.** Since 1 September 2020 a process has been in place for the government Legal Department to share successful employment tribunal outcomes with all senior civil servants across the department within the timescales that Wendy Williams set out.

28. **We will go further still in this theme** by driving forward actions set out in our refreshed race action plan relaunched earlier this year, with a dedicated team to support this. The race action plan sets out our plans for increasing diversity at all levels, improving the lived experiences of black, Asian and minority ethnic staff and plans for improving our understanding of the communities and society that we serve.

## Equality and Human Rights Commission review

29. We are working with the Equality and Human Rights Commission (EHRC) as it completes its assessment of how the Home Office fulfilled its Public Sector Equality Duty obligations during 2014 to 2016. The EHRC will publish its report in October 2020 and make additional recommendations which support our work under Theme 3 (Inclusive and Rigorous Policymaking). We are committed to working with the Commission and welcome its further insights. We will respond with full details of how we will do this once it has completed and published its review.

## Future ambition

30. As a result of the work we are undertaking to go beyond the recommendations and embrace the intent of the Windrush Lessons Learned Review, we want to achieve the following long-term objectives:
- Public trust and confidence in the Home Office is rebuilt and enhanced;
  - Staff feel safe to challenge and ministers feel supported;
  - We are continuously open to external voices and ideas for improvement;
  - The Home Office is more representative of wider society;
  - Our policy and case-working processes are robust and fair.
31. This Comprehensive Improvement Plan sets out how we intend to transform both how we work and the experiences of all those whose lives are affected by and who interact with the Home Office. We are ambitious in what we want to achieve, but we do not underestimate the scale of the challenge ahead. We look forward to hearing the views of everyone, from the Windrush generation and community groups of all backgrounds to individual citizens, colleagues, non-governmental organisations and Parliament, both in response to this report and in the coming years, to help build a new culture in the Home Office.
32. In reporting her findings and recommendations, Wendy Williams said she would judge the Windrush Lessons Learned review to be a success if in 12 to 24 months' time, there is clear evidence of deep cultural reform, with changes in behaviour at all levels and functions throughout the department. We look forward to welcoming Wendy Williams back in 12 months to assess our progress.

# Section 1: Introduction

33. The Home Office has written this Comprehensive Improvement Plan in response to the Windrush Lessons Learned Review, published on 19 March 2020. On 2 May 2018, the then Home Secretary Sajid Javid commissioned the Review, and on 22 June 2018 announced that it would be led by an Independent Adviser, Wendy Williams, in light of the events now commonly known as the “Windrush scandal”: the shameful treatment by the Home Office of British citizens who had come to the UK from overseas and who had every right to be in the UK.
34. The Home Secretary accepted the findings in the Windrush Lessons Learned Review on 23 June 2020. This document sets out the Home Office’s Comprehensive Improvement Plan, which responds to the second recommendation of that Review. We have organised the thirty recommendations that the Review made into the following five themes, which Section 2 explores in more detail:
- **Theme 1: Right the wrongs and learn from the past.** We will be open minded and willing to acknowledge, explore and put right our mistakes including actively using that learning to inform our future work.
  - **Theme 2: A more compassionate approach.** We will ensure that our work takes proper account of the complexity of citizens’ lives so that we make the right decisions.
  - **Theme 3: Inclusive and rigorous policy making.** We will put in place systems and support to enable staff to make, evaluate and improve evidence-based policy that is thorough, rigorous and promotes equality.
  - **Theme 4: Openness to scrutiny:** We will become more outward facing. We listen to, and act on, the views and challenges of both staff and external stakeholders.
  - **Theme 5: An inclusive workforce:** We promote greater diversity in the department, becoming more representative of the communities we serve at all grades, nurturing talent and ensuring action is taken to offer equality of opportunity.
35. Wendy Williams will return to the Home Office to review progress in around 12 months’ time, and her findings will be published. We will continue to learn and implement lessons throughout all our work to meet and wherever possible exceed the expectations of the public.

# Section 2: The Five Themes Guiding Our Response

## Theme 1: Righting the Wrongs and Learning from the Past

### Progress so far and work underway

#### We have:

- Made an unreserved apology to the Windrush generation.
- Provided over 13,300 documents to over 11,500 individuals confirming their status or citizenship (more than 128 nationalities have applied to the Windrush Scheme).
- Provided support to at least 1,568 vulnerable individuals, with 129 cases ongoing.
- Made payments totalling over £1.3m through the Windrush Compensation Scheme on 168 of the 1,531 claims received so far, of over £2.5m offered.
- Launched a new £750,000 national communications campaign to reach out to affected people that the Home Office has so far been unable to reach.

#### We are:

- Working with academic subject matter experts to develop and implement a training programme for Home Office staff on the history of the UK and its relationship with the rest of the world, including Britain's colonial history.
- Organising events to listen and learn from the past, resetting relations with the community and celebrate the contribution of the Windrush generation in order to build for the future.

36. The work of this theme is focused on ensuring that the Home Office has properly listened to and made amends for the wrongs suffered as a result of the Windrush scandal. It is about showing that we are becoming more open-minded. We are committed to putting right our mistakes and using what we have learned to inform our future work. We want to ensure that the whole of the Home Office works in this way and that we can be proud of the way in which we serve the public.
37. We are building on the major programmes of work that we have already put in place to provide redress to those who suffered as a result of the Windrush scandal, including the Windrush Help Team (formerly known as the Windrush Taskforce) and the Windrush Compensation Scheme. We will continue our outreach and engagement with the communities affected, to ensure that we continue to reach those affected and provide them with the help and support they need, to make amends for the injustices they experienced.

---

### Recommendation 1 – Provide a sincere apology

Ministers on behalf of the department should admit that serious harm was inflicted on people who are British and provide an unqualified apology to those affected and to the wider black African-Caribbean community as soon as possible. The sincerity of this apology will be determined by how far the Home Office demonstrates a commitment to learn from its mistakes by making fundamental changes to its culture and way of working, that are both systemic and sustainable.

---

38. On 19 March 2020, **the Home Secretary provided an unqualified apology** in Parliament on behalf of successive governments, to those affected and to the wider black African-Caribbean community. She acknowledged that members of the Windrush generation suffered terrible injustices spurred by institutional failings spanning successive governments over several decades. This included ignorance and thoughtlessness towards the broader theme of race and specifically the history of the Windrush generation. The Home Secretary said that: “on behalf of this and successive governments, I am truly sorry for the actions that spanned decades. I am sorry that people’s trust has been betrayed. We will continue to do everything possible to ensure that the Home Office protects, supports and listens to every single part of the community it serves.” The full statement is available at [GOV.UK](https://www.gov.uk).
39. **The Home Secretary and her ministerial team, as well as the Permanent Secretaries and officials throughout the Home Office, are committed to making fundamental, long-term, and sustainable changes to Home Office culture and how we work.**
- 

### Recommendation 2 – Publish a comprehensive improvement plan

The department should publish a comprehensive improvement plan within six months of this report, which takes account of all its recommendations, on the assumption that I will return to review the progress made in approximately 18 months’ time.

---

40. **This document is the Comprehensive Improvement Plan that comprises our response to this recommendation.** Wendy Williams will return to review progress in September 2021, which will be 18 months from the publication of the Windrush Lessons Learned Review in March 2020.
- 

### Recommendation 3 – Run reconciliation events

In consultation with those affected and building on the engagement and outreach that has already taken place, the department should run a programme of reconciliation events with members of the Windrush generation. These would enable people who have been affected to articulate the impact of the scandal on their lives, in the presence of trained facilitators and/or specialist services and senior Home Office staff and ministers so that they can listen and reflect on their stories. Where necessary, the department would agree to work with other departments to identify follow-up support, in addition to financial compensation.

---

41. **We are hosting a series of events** to allow members of the Windrush generation and their wider community to share their experiences. By engaging with their stories, the Home Office can acknowledge, continue to learn from the past and take the necessary measures to improve the culture in the department. We also want to

celebrate the contribution of members of the Windrush generation to the UK, as a form of cultural commemoration, rebalance the Home Office's relationship with communities and look to the future.

42. We have discussed our approach to this recommendation with a wide range of stakeholders, including community and faith leaders and the Home Office network of Windrush volunteers. **We are working closely with the Windrush Cross-Government Working Group to design and develop the events** with an implementation time period for early 2021. Where necessary, the Home Office will work with other departments and the membership of the Working Group to identify follow up support, in addition to financial compensation.

---

#### Recommendation 4 – Continue the Windrush Scheme and outreach

The Home Secretary should continue the Windrush Scheme and not disband it without first agreeing a set of clear criteria. It should carry on its outreach work, building on the consultation events and other efforts it has made to sustain the relationships it has developed with civil society and community representatives. This will encourage people to resolve their situations, while recognising that, for some, a great deal of effort will be required to build trust.

- 
43. **Both the Windrush Scheme and Windrush Compensation Scheme will be kept open for as long as necessary** in order to provide documentation and compensation to those who need it. We will notify stakeholders and communities in good time before considering closing either of the Schemes.
44. **There are currently no plans to disband the Windrush Scheme**, which allows for people to apply for a document showing their right to be in the UK. When, in the future, it becomes appropriate to think about disbanding the Windrush Scheme, we will work with external partners to establish clear criteria for doing so. We will not agree or publish criteria for disbanding the Windrush Scheme until 2022 at the earliest.
45. The Windrush Compensation Scheme will remain open for claims until 2 April 2023. We will review the current closing date for the Windrush Compensation Scheme in April 2022, to assess if a further extension is required.
46. So far, **the Home Office has held almost 125 engagement and outreach events in support of the Windrush Scheme and Windrush Compensation Scheme** since 2018. To ensure our outreach and engagement continues despite the current social distancing measures, we have held online digital engagement events and will continue to do so.
47. It is essential that people who have been affected by the Windrush scandal get the support and compensation they deserve. In August 2020, **we launched a new £750,000 national communications campaign to reach out to all those affected** who have not yet come forward to either resolve issues around their lawful status or claim compensation owed. The communications campaign aims to raise awareness of the Home Office Windrush Help Team, the Schemes and who may be eligible for support, so that more people apply. The campaign uses a range of channels, such as community radio and press adverts, to increase awareness among those most affected around the UK that have not yet come forward.

48. Alongside the communications campaign we have launched a £500,000 Windrush Schemes Community Fund for community and grassroots organisations to improve awareness of the Windrush Schemes.
49. The Windrush Help Team will continue to provide help and advice on how to apply to the Windrush Scheme and how to make a claim for compensation.

The Windrush Help Team can be contacted:

By email: [commonwealthtaskforce@homeoffice.gov.uk](mailto:commonwealthtaskforce@homeoffice.gov.uk)

By telephone: **0800 678 1925**

Anything you tell the Windrush Help Team will be treated with sensitivity and will not be passed on to Immigration Enforcement.

---

### Recommendation 5 – Be more proactive in identifying those affected

The Home Secretary should accept and implement the National Audit Office (NAO)'s recommendation that "The department should be more proactive in identifying people affected and put right any detriment detected. It should consider reviewing data on: other Commonwealth cases as well as Caribbean nations" or such agreed variation to the recommendation as is acceptable to the NAO. In doing this work, the department should also reassure itself that no-one from the Windrush generation has been wrongly caught up in the enforcement of laws intended to apply to foreign offenders. The department should also take steps to publicly reassure the Windrush generation that this is the case.

---

50. We interpret this to mean that we should ensure that anyone who is eligible for support (through the Windrush Scheme or the Windrush Compensation Scheme) is aware and knows how to access it. **We need to do all we can to proactively identify people who do not have the documentation to evidence their lawful status and to promote the Compensation Scheme.**
51. In April 2018, members of Parliament raised questions as to the number of people who had been wrongfully removed from the UK, detained, or subject to compliant environment sanctions. There is no straightforward way to answer these questions because the Department is limited by what information is held on its systems and whether that information can be used to identify affected individuals. The historical cases review could not identify all people affected in all ways by Windrush issues. Some compliant environment measures, such as "right to work" and "right to rent", operate without the need to refer cases to the Home Office, so we do not hold any data on cases where these measures have affected people. **The work of the historical cases review, as it was originally intended, is complete.** We have provided regular updates to the Home Affairs committee.<sup>1</sup> We continue to keep its future under review.
52. **We will continue to carry out extensive engagement activity**, based on a rigorous analysis of data. We have taken significant action to identify and reach out to people who may have been affected as set out in our response to Recommendation 4.

---

<sup>1</sup> <https://www.gov.uk/government/collections/correspondence-on-the-work-of-the-home-office-windrush>

53. We continue to work with the [Windrush Cross-Government Working Group](#) to ensure we are reaching out to a large audience, not only to those who have been impacted but friends, family and community leaders, who can help spread the message, which is why the communications campaign is so important.
  54. **We continue to work with the National Audit Office** on our approach to this recommendation. We want to make sure anyone who is eligible for support is aware of it and knows how to access it.
  55. Anyone who thinks they have been wrongly caught up in the enforcement of laws intended to apply to foreign national offenders should contact the Windrush Help Team.
- 

## Recommendation 6 – Implement a learning plan on UK history

The Home Office should: a) devise, implement and review a comprehensive learning and development programme which makes sure all its existing and new staff learn about the history of the UK and its relationship with the rest of the world, including Britain's colonial history, the history of inward and outward migration and the history of black Britons. This programme should be developed in partnership with academic experts in historical migration and should include the findings of this review, and its ethnographic research, to understand the impact of the department's decisions; b) publish an annual return confirming how many staff, managers and senior civil servants have completed the programme.

---

56. The Windrush Lessons Learned Review challenges us to learn from the past. This recommendation is focused on building staff knowledge of the history of the UK and its relationship with the rest of the world, so that they better understand the impact of departmental decisions, including when developing and applying immigration policy.
57. We have already taken steps to address this recommendation. **We are developing a historical guide to the roots of the Windrush scandal** for Home Office staff. We have also **held talks with groups of staff explaining the history of the department and its place within the wider history of the UK.**
58. **We will work with experts from academia to develop a departmental UK history training programme for all Home Office staff.** The programme will include content on Britain's colonial history, the history of inward and outward migration to the UK, and the history of black Britons. We aim to have this training programme in place from June 2021.
59. **We will engage with stakeholders and subject experts with a range of experiences and perspectives,** to bring their knowledge and insight into the programme.
60. We will ensure that our response has a lasting impact through ongoing monitoring and assurance of learning uptake and impact. Training completion rates will be published annually, confirming how many staff, managers and senior civil servants have completed the programme.

## Recommendation 16 – Establish a repository for recommendations

The Home Office should establish a central repository for collating, sharing and overseeing responses and activity resulting from external and internal reports and recommendations, and adverse case decisions. This will make sure lessons and improvements are disseminated across the organisation and inform policymaking and operational practice.

61. This recommendation is about recording responses to reports and recommendations in such a way as to drive organisational learning and to provide a rich, rounded, contextual picture to inform policy making and operational practice. We want to ensure that lack of progress on responding to recommendations can be easily identified and rectified to contribute to a culture of learning.
62. Building on work that was already underway prior to the review, **we are testing new software to act as a central repository for externally- and internally-generated recommendations.**
63. The software is being piloted, and a phased roll out is due to start in late 2020. By September 2021, recommendations from key external and internal sources will be uploaded to, and managed via, this repository.
64. Home Office staff will be able to monitor and respond to management information relating to recommendations across the Home Office.
65. In the future, we hope to go beyond the recording of the recommendations and create an analytical capability to identify outputs including lessons and themes for improvement, and to develop mechanisms for connecting such output to relevant Home Office boards, committees, networks and operational and policy teams.

## Going beyond the recommendations

### The Windrush Cross-Government Working Group

66. We will continue to work with the Windrush Cross-Government Working Group co-chaired by the Home Secretary and Bishop Derek Webley. The Windrush Cross-Government Working Group will play a pivotal role in ensuring the government upholds its commitment to the Windrush generation and their descendants. Alongside the Commission on Race and Ethnic Disparities, this Group will play a critical role in supporting the design and delivery of practical solutions to address the wider challenges that disproportionately affect people from black Asian and minority ethnic backgrounds.
67. The Working Group has set out its immediate priorities and is supported by three sub-groups, including the sub-group chaired by Duwayne Brooks OBE, to provide advice and challenge to the Home Office's response to the Windrush Lessons Learned Review. We work closely with the sub-group who act as critical friends. They offer challenge, advice and the voices of the community to the implementation of the Windrush Lessons Learned Review.

### Cross-government working

68. In light of the cross-government nature of the Review's findings, we are sharing them with other government departments including through Windrush cross-government roundtable discussion groups. These groups bring together senior representatives from a range of government departments (from the Department for Work and

Pensions to HMRC and the National Crime Agency) to share lessons on topics highlighted as part of the Windrush Lessons Learned Review. The discussions are designed to share expertise and improve how government can put the public at the heart of our work and provide opportunities to share best practice and encourage joint working between departments.

## Theme Success

69. Wendy Williams has asked us to demonstrate clear evidence of deep cultural reform, with changes in behaviour at all levels and functions throughout the department, in 12 to 24 months' time.
70. Our overall ambition for this theme is to **rebuild public trust and confidence in the department**. We hope that in six months the public's view of the department will demonstrate a shift towards recognising that the Home Office is genuinely listening to communities and experts and is acting on what we hear.
71. We will continue to be proactive in communicating with the public. Our engagement with key external stakeholders, through forums such as the Windrush Cross-Government Working Group will continue.

## Theme 2: A More Compassionate Approach

### Progress so far and work underway

#### We have:

- Set the new Home Office mission '*building a safe, fair and prosperous UK*'.
- Launched a new mandatory training package, the 'Face Behind the Case', for all staff in UKVI.
- Welcomed over 70,000 customers to our UKVI Service and Support Centres throughout the UK since their launch in March 2019, providing the opportunity for customers to meet caseworkers face to face and receive enhanced support where required.

#### We are:

- Carrying out a full review and evaluation of the compliant environment policy and measures, individually and cumulatively.
- Publishing our clear vision, mission and values statement, supported by a single Values-based Leadership Framework.
- Developing an ethical decision-making model and set of ethical standards that will integrate into existing frameworks and processes.
- Creating a Young People's Board to provide insight into the customer experience and our approach to vulnerability, composed of 15 to 25-year olds who have recently been through the immigration system.

72. This theme is about putting people first in everything that we do and is at the heart of ensuring that nothing like the injustices faced by some of the Windrush generation can ever happen again. Our ambition is to create a fundamental shift in the culture of the department to ensure that the interests of the communities and individuals we serve underpin how we work every day.
73. We need to be balanced and fair with the people we interact with and give the department a human face. We need to understand the diverse parts of our community, including the most vulnerable in society, to ensure that we take proper account of the complexity of people's lives and make sure that we make the right decisions.
74. The recommendations in this theme focus on improving our culture and the way we work, as well as on changes to be made on, for example, the use of discretion, ethics, the burden of proof, our service standards and our approach to supporting vulnerable customers.

---

## Recommendation 7 – Review the compliant environment

The Home Secretary should commission officials to undertake a full review and evaluation of the hostile/compliant environment policy and measures – individually and cumulatively. This should include assessing whether they are effective and proportionate in meeting their stated aim, given the risks inherent in the policy set out in this report, and its impact on British citizens and migrants with status, with reference to equality law and particularly the public sector equality duty. This review must be carried out scrupulously, designed in partnership with external experts and published in a timely way.

---

75. The public expects us to enforce immigration laws approved by Parliament as a matter of fairness to those who abide by the rules and to protect tax-payer funded services, by ensuring that only those who are entitled to use publicly funded services can access them and that those who are here legitimately do not suffer negative consequences. We do not intend to deviate from these key principles, but we intend to evaluate the effectiveness, where possible, and include safeguards to avoid any unintended consequences. If we find evidence that they are not achieving our objectives, we will review and adapt our policies.
76. **We have already put in place measures to improve our assurance functions to ensure something like the Windrush scandal never happens again**, such as improving decision-making and the introduction of new safeguards in our data-sharing processes. We have also introduced additional safeguards for tenants as well as improving the [Right to Work](#) and [Right to Rent](#) pages and published guidance on GOV.UK for individuals, [employers](#) and [landlords](#).
77. The compliant environment aims to deter immigration offending, including discouraging those who may be thinking of coming to the UK unlawfully from doing so, to secure compliance and support the enforcement of UK immigration laws; protect taxpayer's money; and protect vulnerable migrants from the risk of exploitation by unscrupulous employers and landlords.
78. **There are six primary streams to the compliant environment** – some of which only apply to England and Wales – which will be covered in our response to this recommendation. These are:
- Work – to prevent those who are ineligible from working;
  - Housing – to prevent those without lawful status from accessing the private rental sector.
  - Public Funds – to prevent those who are ineligible from accessing mainstream support and benefits;
  - Health – to charge upfront for non-urgent health care and recover costs for emergency treatment where payment upfront was not possible;
  - Financial Services – to prevent people deemed as disqualified due to lack of lawful status from accessing current accounts;
  - Driving – to prevent those without lawful status from holding licences while in the UK.
79. **We will look at all the measures individually and then cumulatively**, building on existing work such as the ongoing right to rent evaluation which is being conducted by an external agency. **The work will be underpinned by three**

**key principles: ongoing regular monitoring and evaluation** (not just a single monolithic approach); **ongoing external engagement and transparency**; and **openness to change** to ensure policies deliver the desired objectives.

80. This a complex set of policies and will necessarily involve taking a novel approach to research. We are therefore approaching the evaluation in stages, which will deliver a range of outputs at different times. Transparency and engagement will remain at the heart of our approach throughout this process. This will include structured engagement with a wide-range of groups to inform its findings.
81. Work has already begun, and we are aiming to complete the ongoing right to rent evaluation by summer 2021. Initial analysis of data and evidence on the compliant environment will be completed by autumn 2021. Long-term evaluation will be ongoing, and timescales will be determined by the outcomes from the initial analysis.

### Recommendation 14 – Set a clear purpose, mission, and values statement

The Home Secretary should a) set a clear purpose, mission and values statement which has at its heart fairness, humanity, openness, diversity and inclusion. The mission and values statement should be published and based on meaningful consultation with staff and the public and be accompanied by a plan for ensuring they underpin everyday practice in the department. It should establish robust plans for making them central to everything it does. The department should set its mission and values statement in consultation with its staff, networks and other representative bodies, the public, communities and civil society, and publish it online; b) translate its purpose, mission and values into clear expectations for leadership behaviours at all levels, from senior officials to junior staff. It should make sure they emphasise the importance of open engagement and collaboration, as well as valuing diversity and inclusion, both externally and internally. The performance objectives of leaders at all levels should reflect these behaviours, so that they are accountable for demonstrating them every day.

82. The new mission for the Home Office – **‘building a safe, fair and prosperous UK’** – has already been set. Over 70% of staff who responded to a recent survey said they clearly or very clearly connected with the mission. Further staff and external stakeholder consultations are now taking place.
83. Alongside this, we have undertaken a month-long all staff consultation whose 15,000 suggestions have helped to set our values. We are now consulting further, both internally and externally, on the following values:
  - **Compassion:** We are honest, consistent and ethical, acting with humanity, care and sensitivity to build trust and confidence.
  - **Collaboration:** We work supportively as one team, collaborating with our stakeholders across boundaries to improve outcomes for the public.
  - **Courage:** We value different perspectives and work to understand the realities of the people we serve. We are open to challenge and bold in our pursuit of operational excellence.
84. We are also testing whether to incorporate the principles of the following value into the three behavioural statements above, or whether to include it as a separate fourth value.
  - **Respectful:** We treat people fairly, respecting individual values and perspectives while embracing our difference.

85. Once further testing and refinement is complete, we will **publish a clear statement of the vision, mission, and values** of the Home Office later this autumn. It will be supported by a **single Values-based Leadership Framework**, which will set clear expectations for all leaders and managers, with clear accountabilities and required behaviours to ensure they are genuinely challenged, and held accountable, on how they act and the type of culture they create. We will review and assess our current people practices, including ensuring that our performance management approach reflects our values, and that all people management policies and processes reinforce those values.
86. The results of this work must be effectively communicated and embedded across the organisation so that the **mission and values become part of the Home Office lived experience**. In future we will test the effectiveness of our policies and procedures against our values and ensure that they are an integral part of our learning and development offer for staff.
87. To **measure our success**, we will be monitoring responses to our relevant all staff survey questions '*I feel involved in our culture change work on values*' and '*I believe the actions of senior managers are consistent with Home Office values*'. We also aim to develop a way to assess the impact this work has on the conduct of our staff and in turn, the service that citizens and customers receive.

---

### Recommendation 15 – Implement a programme of major cultural change

a) The Home Office should devise a programme of major cultural change for the whole department and all staff, aimed at encouraging the workforce and networks to contribute to the values and purpose of the organisation and how it will turn them into reality. It should also assure itself as to the efficacy of its organisational design. Outputs could include independently chaired focus groups to let staff of all grades and areas of work (particularly under-represented groups) describe their lived experience, including working within the department and suggest what needs to change in terms of the department's mission, values and culture; b) The Permanent Secretary and Second Permanent Secretary should lead the process, with the support of the senior leadership, who should commit to agreeing a programme with senior-level accountability, including clear actions, objectives and timescales; c) The workforce and staff networks should help devise the success criteria for the programme and a senior member of the leadership team should be the sponsor for the programme; d) The department should invest in, develop and roll out a leadership development programme for all senior, middle and frontline managers where leadership behaviours and values will be made clear.

- 
88. The department is committed to delivering the programme of major cultural change set out in this recommendation. Fundamental cultural change takes time and there is no quick fix, however work has already begun on a **departmental wide culture assessment** that will conclude before the end of the year. The assessment will seek out and listen to external perspectives as well as those of staff and will ultimately enable us to understand the unwritten rules and assumptions that characterise the department's culture.
89. We will work with an external provider to analyse the results of the cultural assessment and will **design a culture change programme**. The programme will be led by the Permanent Secretaries, will be designed by the end of January 2021 and implemented by the end of that year. The programme will support recommendation 14

– the setting of the Home Office’s mission, vision and values. Our Home Office staff networks will play an important role in the assessment and the subsequent cultural change programme.

90. To **measure success**, we initially plan to track progress in our all staff annual People Survey to the questions ‘*I am able to contribute to how the Home Office needs to change to continue delivering for the public*’ and ‘*I feel able to challenge inappropriate behaviour in the workplace*’. As the culture change programme is finalised, we will review the initiatives developed to assess the most appropriate measures to hold ourselves to account. As this is a long-term programme, we will evaluate the initiatives beyond implementation to ensure they have the desired effect.

---

### Recommendation 17 – Develop ethical standards and a decision-making model

The Home Office should develop a set of ethical standards and an ethical decision-making model, built on the Civil Service Code and principles of fairness, rigour and humanity, that BICS staff at all levels understand, and are accountable for upholding. The focus should be on getting the decision right first time. The ethical framework should be a public document and available on the department’s website. A system for monitoring compliance with the ethical standard should be built into the Performance Development Review process.

- 
91. We are testing various approaches to ethical decision-making to match the different contexts in which Home Office staff make immigration decisions, from complex casework environments in offices to the UK border. A range of colleagues are working on this, including the UKVI Chief Caseworker Unit (see page 28) and the Office of the Children’s Champion, who have experience in ethical decision-making from local authority social services, and staff from the immigration system operational commands.
92. Following testing, we will publish the ethical decision-making model, which will be linked to the new Home Office values (recommendation 14). The model will be **integrated into existing frameworks for immigration decisions** and become part of the decision-making process. We are learning from existing ethical decision-making models, including from policing and social work, who we will consult, alongside experts and customers in developing our own model. In support of decision-makers, by April 2021 we will develop an **escalation route for the consideration of ethical issues** which will vary depending on the environment in which immigration decisions are being made. This will ensure that staff are able to raise ethical issues of concern as they arise. To accompany this, we will establish ethical champions, embedded within teams, and create ethical panels to consider escalations.
93. To provide valuable insight into the customer experience and our approach to vulnerability, by January 2021 we hope to have **established a Young People’s Board**. The board will be composed of 15- to 25-year olds who have recently been through the immigration system. We will learn from the experiences of this vulnerable group to ensure our services are working appropriately for all those who pass through our immigration system.
94. Rollout of the ethical decision-making model will initially focus on the case-working environment, but we will then **expand use of the model more widely** across the Borders, Immigration and Citizenship System (BICS), supported by training and guidance to help embed cultural change. Our longer-term ambition is to apply the

approach across the Home Office in both policy and operational contexts. To endorse and spearhead this work we will appoint a member of the Home Office Board to lead the ethics agenda for the department.

95. To **measure our success**, we expect to see an increase in case escalation for ethical considerations. Over the longer term, we would expect to see a decrease in the number of cases that are overturned at tribunal as the ethical model will ensure decision-makers get the decision right first time.

---

### Recommendation 18 – Improve guidance on the burden and standard of proof

The Home Office should establish more and clearer guidance on the burden and standard of proof particularly for the information of applicants, indicating more clearly than previously how it operates and what the practical requirements are upon them for different application routes. The decision-making framework should include at least guidelines on when the burden of proof lies on the applicant, what standard of proof applies, the parameters for using discretion and when to provide supervision or ask for a second opinion. This should produce more transparent and more consistent decision-making.

---

96. The intent of this recommendation is to ensure the department does not impose impossible burdens on applicants, especially when we hold relevant information or can obtain it more easily than the customer. It is about making sure there is not a culture of disbelief and that caseworkers really think about the person behind the case, rather than the process.
97. Our response is primarily through the Simplification of the Rules programme. The programme aims to **consolidate and simplify the immigration rules**, as well as restructure them so that they are easy to understand and use. One strand of this programme focusses on avoiding an unnecessarily prescriptive approach to evidence and providing clarity for customers and caseworkers. This involves removing provisions from the immigration rules, where non-compliance can lead to an application being refused, and instead putting them in guidance. **This then allows the decision-maker to use discretion and decide if the evidence provided meets the requirement.**
98. The Simplification of the Rules Review Committee, which is made up of external representative bodies and meets monthly, is consulted on this work. As the immigration rules are simplified for different immigration routes, clearer published guidance on the burden of proof and evidential requirements will follow. **We expect to make significant progress throughout 2021** and requirements will continue to be reviewed on an ongoing basis in future.
99. We also want to **change the culture of decision-making**, so that decision-makers feel confident and supported to use their discretion and we can be confident of success in practice. Training will be provided for decision-makers and the work on training and cultural embedding will be closely linked with recommendation 17 on the introduction of the ethical framework. Both recommendations are about seeing people not cases and the 'Face Behind the Case' campaign (see page 28) plays an important part in this throughout UKVI. To **measure our success** following publication of the simplified guidance, we plan to seek and track the feedback we receive.

---

## Recommendation 19 – Improve UKVI customer contact, service, performance and assurance

a) UK Visas and Immigration should ensure that where appropriate it: builds in criteria for increasing direct contact with applicants, including frequency of contact, performance standards and monitoring arrangements; revises the criteria and process for assessing cases involving vulnerable applicants; and reviews its service standards and where appropriate provides new standards based on qualitative as well as quantitative measures. UKVI should ensure it revises its assurance strategy; disseminates the learning from recent Operational Assurance Security Unit (OASU) or internal audit reviews; identifies criteria and a commissioning model for OASU or internal audit reviews; contains clear mechanisms for reporting back casework issues to frontline staff, and criteria for supervision, including recording outcomes and learning for the wider organisation; b) the department should review the UK Visas and Immigration assurance strategy periodically to make sure it is operating effectively, and the reviews should consult practitioners as well as specialist staff to make sure the strategy changes if it needs to.

---

100. There are several elements to this recommendation, which focusses on improving the way UKVI interacts with its customers by taking a more person-centric approach, improving the quality of decision-making, ensuring there are proper assurance processes and standards in place, and an improved process and culture around identifying, managing and escalating risk.
101. We have already made **several immediate improvements to how we identify and escalate risk**, such as the establishment of the Borders, Immigration and Citizenship System (BICS) Early Warning system. This is part of the Warning and Reporting team in the BICS Hub, which was setup following the Windrush scandal. This aims to spot emerging issues and remedy them at the source. The system includes a mechanism for staff to speak up when something does not feel right. We now also have a centralised risk log as well as a monthly risk and assurance forum to review current issues. The Immigration Enforcement Safety Valve Mechanism, UKVI Chief Caseworker Unit, Professionalisation Hub and 'Face Behind the Case' campaign all also contribute to the aims of this recommendation to take a more person-centric approach and to support decision-makers. These are covered in more detail later in this document.
102. In response to the elements of the recommendation focussed on customer contact and service standards, UKVI have already **developed a customer and channel strategy** that seeks to better understand customers and their needs, simplify customer journeys, improve customer interactions with the department, and strengthen oversight of customer issues so that we respond appropriately. The strategy is now in its design phase and will start to be implemented from 2021, subject to funding. We plan to go further here and expand this into a cross-BICS strategy to drive largescale change.
103. We are also working on a **Future Casework initiative**, which supports a system that more effectively identifies appropriate immigration routes based on an applicant's characteristics and has more customer interaction throughout the application process. We are also reviewing performance standards and Key Performance Indicators to develop principles that will allow us to understand how we are performing across the immigration system and improve our reporting framework. Our aim is for a new reporting and performance framework and dashboard to be complete by March 2021.

104. To improve our approach to vulnerable applicants, we have gone beyond UKVI and have already developed a Home Office-wide strategy to **bring a consistent approach to vulnerability across all BICS operational areas**. This will be published and included in staff guidance in 2021.
105. Our assurance strategy forms another key part of this recommendation. The Operational Assurance Security Unit has already published **the UKVI assurance strategy**. Again, we plan to go further here and expand the strategy across the BICS to drive consistent standards. We are scoping this work and aim to draft the strategy by December 2020 and publish by March 2021. In line with part b of this recommendation, we commit to reviewing the strategy periodically to ensure it is fit for purpose.
106. To **measure success**, we plan to monitor our customer satisfaction indicators and the number of cases referred to the UKVI Chief Caseworker Unit and Immigration Enforcement Safety Valve Mechanism. In future we will be better equipped to spot and deal with future risks and we would also expect to see better staff survey results in areas such as feeling able to speak up, feeling supported by managers, and the Home Office being a great place to work.

## Going beyond the recommendations

107. The **UKVI Chief Caseworker Unit** was established following the Windrush scandal to champion culture change across UKVI. The unit **promotes discretion and a human focus in case-working**, considering the person not just the application. Where decision makers experience discomfort in a decision, they can consult the Chief Caseworker Unit to consider the options available and where possible, the unit will take a holistic approach to finding the best solution for the customer. The Chief Caseworker Unit also seeks to identify wider systemic issues and trends that are preventing effective decision making, as well as improving the interaction between policy and operational teams to ensure that policies reflect operational reality. We are developing the unit further by establishing a Chief Caseworker Structure across UKVI. This will see a group of Chief Caseworkers, who are at the right level to influence change in their directorates, brought together to improve the consistency, quality and sustainability of decision-making.
108. The Chief Caseworker Unit have developed a campaign designed to bring decision-makers in UKVI closer to their customers. The **'Face Behind the Case'** campaign consists of an e-learning course which launched in August 2020 and a video campaign which we plan to launch in October 2020. The e-learning focusses on seeing customers as people, increasing knowledge of customer service principles and making sure lessons are learnt from the Windrush scandal. It contains real case studies, videos of the Windrush generation recounting their experiences, and links directly to recommendations in the Windrush Lessons Learned Review. The e-learning includes an assessment with an 80% pass mark and is now mandated for all staff in UKVI. The e-learning will be developed further and rolled out to other relevant areas across BICS.
109. The Chief Caseworker Unit introduced a new Policy Superuser Network on 1 June 2020. This forms part of **our work to identify policies which do not reflect operational reality and could have unintended consequences for customers**. This network provides better support for operational teams when receiving and implementing policy and guidance changes. It will work to ensure that policies reflect operational reality, support effective decision-making and, crucially, are developed with the customer at the heart.

110. The **UKVI Professionalisation Hub (PH)**, which sits alongside the Chief Caseworker Unit, is professionalising casework. We want to **ensure that decision-makers have the skills and capability to do the job and that this is tested and recognised**. We are piloting a Licence to Operate across several teams in UKVI, as well as in one Immigration Enforcement team. This is an evidence-based portfolio and career development system, where core skills and operational competence are identified, measured and validated. The 'Licence to Operate' will be valid for 24 months. A decision-maker will then be reassessed, and part of that assessment will be based on assuring that they have retained previously-assessed skills and foundational learning, as well as their competence in new practices and guidance. All Licence holders will be required to re-take the "Face Behind the Case" e-learning to ensure that the Windrush scandal remains at the heart of our learning.
111. This system **aids the development of individuals and provides assurance that our people possess the knowledge and skills to fulfil their role to a high standard**. We are due to evaluate and report on the pilot in October 2020. Based on early successful findings, we have already started to rollout the approach to additional business areas and hopefully to all decision-making areas over the next 12 months.
112. Alongside this, we are building the skills of our internal trainers. Our learning materials in UKVI will also be reviewed and assessed by external experts to increase confidence in products and delivery. We are working with City & Guilds and plan to start this process from October.
113. As set out in the Windrush Lessons Learned Review, from October 2018 the majority of those who used UKVI services could complete their immigration application at new **Front-End Customer Service (FES) Points** across the UK. Additionally, we have now opened seven **Service and Support Centres (SSCs)** in recognition that some customers may have more complex circumstances, higher needs, or be in a position of vulnerability. The centres opened in 2019 and **enable these customers to meet experienced UKVI staff face-to-face** to receive help with their application as part of an enhanced service. They also help us collect the right information and evidence first time. We are now looking to improve the SSCs further and have recently begun a transformation project which will learn lessons including from changes in response to COVID-19.
114. The SSCs are free to all eligible customers and to date, **over 73,000 customers have now attended an SSC**. The Service and Support Appointment line (SSAL) opened on 25 March 2019 allowing customers to book an appointment at an SSC. From 8 July 2019 customers have also had the option of booking their appointment online. We have provided Interpreters for over 1,100 customers and, for those customers who require enhanced support, we have provided financial assistance to travel to an SSC in over 4,000 cases.
115. In Immigration Enforcement (IE), the **Safety Valve Mechanism (SVM)** was created to improve the culture by encouraging staff to see the person, not just the case. The team is made up of a virtual community of experts from across the business who provide advice, monitor trends and work with policy to learn from cases to improve future responses. **The mechanism provides additional support to decision makers in cases where they feel that something simply is not right**. The SVM supports existing expertise within teams by providing further safeguards and another avenue of advice when people feel uncomfortable with the decision that they are making. It is accessible to all IE areas, not just caseworkers.

116. Since the launch of the SVM in December 2018, there have been 356 referrals, 84% of which have been from frontline staff upon encountering people during their work. This suggests that there is now a **greater awareness across IE to make progress in cases and help people in their immigration journey**. Without the SVM these individuals would possibly not have had their cases reviewed and, in many cases, concluded. The remaining referrals have come from caseworkers requiring support with decision-making.

## Theme Success

117. To succeed, the work of this theme must result in an open and positive continuous learning environment, where staff feel safe to challenge and the right behaviours are modelled and reinforced consistently by senior leadership. Culturally, over time, staff and stakeholders will be able to see and feel the difference.
118. Greater focus on training with clear frameworks and guidance, along with increased use of discretion and case escalation when something doesn't feel right, will ensure the department takes a more personal approach with our customers. The ambition for the aims of this theme, to reach across the entire Home Office, will mean that all people who interact with the department, regardless of the outcomes of the decision, will receive a good customer experience rooted in respect, dignity and humanity.

## Theme 3: Robust and Inclusive Policymaking

### Progress so far and work underway

#### We have:

- Ensured that officials and ministers explicitly and routinely consider the equalities impacts of policy and other decisions by updating the main document we use to provide advice to ministers and Permanent Secretaries.
- Developed a simple set of Policy Tests for all policy officials to use, which will ensure that they address the Windrush Lessons Learned Review lessons when developing new policies.
- Implemented a new electronic records management system to record all submissions, minutes, and notes, which over 8,000 staff now use, and our aim is for all staff to use it within a year.

#### We are:

- Putting equalities at the heart of what we do through improving how we assess the equalities impact of our work through training immigration and policy officials, lawyers, and analysts in how to conduct a rigorous Regulatory Impact Assessment and an Equality Impact Assessment.
- Considering how we can work with the Law Commission to ensure the law is easier to understand for public and officials alike, through the consolidation of immigration legislation that will build on existing work on simplification of the Immigration Rules.
- Developing training for immigration operational and policy officials in the history of immigration legislation.

119. The third theme of our response to the Windrush Lessons Learned Review is **Robust and Inclusive Policymaking**. This is about ensuring that the systems which support policymaking and the culture in which policymaking takes place enable staff to make evidence-based policy that is thorough, rigorous, promotes equality, and is communicated to ministers with clarity to enable ministers to make fully informed decisions. It is about reinvigorating the policymaking process so that consideration of our equality duties and the potential impacts on our communities remains central to everything we do, and not an afterthought. In addition to the recommendations under this theme, we are developing a culture of professional curiosity, where staff across the department strive to be Whitehall-leading policymakers.
120. The recommendations in this theme can be broadly grouped into: the impact of policies on the public, especially the equalities-related impacts; best practice in policymaking; knowledge and information management; and legislation. Where possible, we will apply the recommendations to all Home Office policy areas, as well as to other parts of the Home Office such as our analytical, operational and enabling functions where appropriate.

---

## Recommendation 11 – Improve historical understanding of immigration legislation

The department should re-educate itself fully about the current reach and effect of immigration and nationality law and take steps to maintain its institutional memory. It should do this by making sure its staff understand the history of immigration legislation and build expertise in the department, and by carrying out historical research when considering new legislation.

---

121. We are building on the positive changes that Wendy Williams noted in her review such as the BICS Policy Assurance Framework (which provides greater assurance on the way in which policy is developed, implemented and evaluated). We are: (a) re-educating ourselves fully about the current reach and effect of immigration and nationality law; (b) building institutional memory and improved methods of capturing staff knowledge in the department and ensuring policymakers have access to that when developing and evaluating policy; and (c) developing a culture of professional curiosity among Home Office policymakers, so that they always look to understand the historical development of their policy. This will improve standards in policymaking and case-working to avoid errors as a result of lack of understanding of the legal framework and how it applies to different cohorts and individuals.

### Improving understanding of immigration law

122. Together with the Home Office History Network and Race Action Board, we are developing a training programme to ensure that immigration officials understand the history of nationality and immigration legislation. **We have developed draft training materials for the nationality and immigration law history course** which is being tested with staff and Windrush volunteers. We will engage external expert groups and individuals, to ensure the training materials have the correct content, tone and focus, and are working towards rolling out the training during 2021. Our success measures are likely to include training completion rates and average knowledge scores following the completion of training.
123. **Six policy staff are being sponsored in 2020/21 to undertake a professional immigration law qualification** (the CILEx level 6), which provides a comprehensive view of the immigration, asylum and nationality system. We will assess the benefits of this type of training as part of our longer-term response to this recommendation.

### Improving institutional memory

124. By the time of the Windrush Lessons Learned Review publication, we had already **made progress in improving information management and retention of historical documents** relating to key decisions. We have also started initiatives to improve the capture and sharing of ‘tacit’ knowledge (that held within individuals), including development and introduction of a handover note template. Since March, we have continued to explore further opportunities in this area.

---

## Recommendation 12 – Deliver Equality Act and Human Rights Act training

The department should embark on a structured programme of training and development for all immigration and policy officials and senior civil servants in relation to the Equality Act 2010 and the department's public sector equality duty (PSED) and obligations under the Human Rights Act 1998. Every year, the department should publish details of training courses attended, and how many people have completed them.

---

125. All officials need to better understand their obligations, both legally and to their fellow citizens, with respect to the equalities and human rights consequences of their work. Our objective is for officials to consistently consider equalities from the conception to the implementation of a policy or operational process, and to monitor the impacts regularly in case of changes such as to policy, legislation or context. We recommend that as a matter of best practice, officials should also consider the cumulative impact of multiple policies. It is important that the focus shifts beyond the theoretical **intent** of the intended outcome and towards the **impact** on citizens in practice.
126. The Home Office **set up a Public Sector Equality Duty team in 2019 to be the department's centre of excellence**. The team develops and delivers training and tools to officials and provides bespoke advice to enable them to understand their Public Sector Equality Duty obligations, and how to consider the equalities impacts of proposed policy or other changes through use of an Equality Impact Assessment (EIA). EIAs ensure that our decisions in relation to the formulation of policies, guidance and legislation have considered the equality impacts on those who have protected characteristics.
127. **We will ensure that officials in all areas – not just policy and immigration officials – are trained to ensure the proper discharge of the Public Sector Equality Duty in the Equality Act 2010**. We aim to have trained Senior Civil Servants in the four Home Office policy groups (the Office for Security and Counter-Terrorism, the Borders Immigration and Citizenship System, the Serious and Organised Crime Group, and the Crime, Policing and Fire Group) by spring 2021. Training on the Public Sector Equality Duty will also contain material to increase awareness of obligations under the Human Rights Act 1998 and the prohibition against discrimination. We will judge success through the number of staff who have attended training courses, which we will publish.

### Recommendation 13 – Improve Impact Assessments

Ministers should ensure that all policies and proposals for legislation on immigration and nationality are subjected to rigorous impact assessments in line with Treasury guidelines. Officials should avoid putting forward options on the binary “do this or do nothing” basis, but instead should consider a range of options. The assessments must always consider whether there is a risk of an adverse impact on racial groups who are legitimately in the country. And consultation on these effects should be meaningful, offering informed proposals and openly seeking advice and challenge.

---

128. We need to ensure that the potential impacts, risks, and unintended consequences associated with Home Office-led legislation are properly considered and rigorously tested and that mitigation measures to address such consequences are put in place where necessary.
129. **We will consult more consistently, effectively, and meaningfully** across all our work, as we set out further in our response to Recommendation 8, to seek and consider the views of stakeholders and the public in the policy-making process.
130. In all published Regulatory Impact Assessments for legislation, **there are now mandatory requirements to address the Public Sector Equality Duty, to consider discrimination or unintended consequences to specific groups, and to set out mitigating actions that might prevent or minimise these.** These assessments are available publicly on GOV.UK and on the UK Parliament website as a supporting document, which enables public and parliamentary scrutiny and challenge of our approach.
131. Our Regulatory Impact Assessments are subject either to the independent Regulatory Policy Committee for scrutiny or, for where impacts are relatively minor, to both internal Analytical Quality Assurance and a triple clearance process of the Chief Economist, Head of the Better Regulation Unit and the Senior Responsible Owner.
132. We have **developed training and are monitoring policy proposals to ensure that there is more open and meaningful consultation and that consultation Regulatory Impact Assessments do not present binary options.** Public consultation will offer a properly and rigorously assessed short list of options with proportionate and appropriate analysis to support the proposals. We plan to have trained middle-management and senior civil servants in all policy groups by spring 2021 in the new approach to conducting Regulatory Impact Assessments. We are considering how best to train those working in operational areas.
133. We intend to judge success on the number and proportion of policy officials and analysts receiving training on how to conduct impact assessments, and on samples of Regulatory Impact Assessments to ensure that they consider at least than two options as well as a “Do Nothing” option to compare against.

---

## Recommendation 21 – Consolidate immigration statute law

Building on the Law Commission's review of the Immigration Rules the Home Secretary should request that the Law Commission extend the remit of its simplification programme to include work to consolidate statute law. This will make sure the law is much more accessible for the public, enforcement officers, caseworkers, advisers, judges and Home Office policymakers.

---

134. We are discussing with the Law Commission how and when to **consolidate immigration legislation to make the legal system easier to navigate and understand** for applicants, citizens, officials, and ministers. Due to the complexity and extent of immigration legislation, addressing this recommendation successfully is likely to take some time.
135. We will develop measures of success once we agree an approach with the Law Commission, but we expect these may include comprehensiveness, clarity and accessibility for the non-expert user, including stakeholder feedback that it is easier to understand and navigate the law. We would also expect less litigation on the interpretation of the legislation.
136. In the meantime, **we are continuing our work on Simplification, a core component of which is simplification of the Immigration Rules**, which regulate the entry into and stay in the UK of people who are subject to immigration control. In doing so we are implementing the recommendations of the Law Commission's Simplification of the Immigration Rules report,<sup>2</sup> which was published in January 2020. We accepted 24 of the recommendations and partially accepted 17.<sup>3</sup> We will apply the principles recommended by the Law Commission:
- suitability for the non-expert user
  - comprehensiveness
  - accuracy
  - clarity and accessibility
  - consistency
  - durability
  - capacity for presentation in a digital form.
137. In addition, we are simplifying supporting tools such as guidance, templates, and content on GOV.UK.
138. We are working with the Simplification of the Rules Review Committee, recommended by the Law Commission, as well as other internal and external stakeholders, to ensure we deliver on our commitments.
139. Simplification of the Rules is essential to the delivery of an effective immigration system. We have delivered the first phase of this work in the Student and Child Student rules laid in September and we will continue to revise and simplify the rules over the next year. Our aim is for consolidated and simplified Rules for all routes to be in force from spring 2021. They will provide the foundation for our global points-based immigration system that is fair, firm, effective and compassionate.

---

<sup>2</sup> <https://www.lawcom.gov.uk/project/simplifying-the-immigration-rules/>

<sup>3</sup> <https://www.gov.uk/government/publications/simplifying-the-immigration-rules-a-response>

---

## Recommendation 22 – Better spot trends and improve knowledge and records management

The Home Office should invest in improving data quality, management information and performance measures which focus on results as well as throughput. Leaders in the department should promote the best use of this data and improve the capability to anticipate, monitor and identify trends, as well as collate casework data which links performance data to Parliamentary questions, complaints and other information, including feedback from external agencies, departments and the public (with the facility to escalate local issues). The Home Office should also invest in improving its knowledge management and record keeping.

---

140. Home Office information is currently stored across several different systems. To ensure that we can better manage our records and easily locate information, **we have already begun to move staff to a single digital repository for information, to invest in new search tools and update our paper file management systems.** This is likely to take 18 to 24 months and includes training and support in good information and records management practice, behaviours and culture. We intend to track how successful our approach is through measuring usage rates of the electronic file management system.
141. We are **improving our management information to allow the Home Office to better identify risks, look for early warning signs and then act.** This includes making better use of our existing data, as well as strengthening our capability to capture and analyse new insights, and then act. We will build on steps we have already taken, such as the creation of the Chief Caseworker Unit. **We are also developing our skills and resources to capture and manage knowledge,** to reduce the risk of missing vital insight and lessons from staff in decision-making, policy development and operational delivery. To assist in this, we are developing a distinct Knowledge Management Strategy. Fully embedding the changes to behaviours and culture is likely to take three to five years.
142. Improved knowledge, skills and confidence of senior civil servants to provide candid, comprehensive and timely advice to ministers will contribute to more effective decision-making including a greater and earlier ministerial awareness of risks and issues.

---

## Recommendation 24 – Invest in training for senior officials on advising ministers

The department should invest in training for the Senior Civil Service to ensure appropriate emphasis on the roles and responsibilities of officials to provide candid, comprehensive and timely advice to ministers

---

143. **Extensive training is already available to support senior civil servants in conducting their roles and responsibilities.** This includes a Civil Service Orientation for senior civil servants new to the Civil Service, 12-month Director and Deputy Director leadership training programmes, and a bespoke Director General leadership programme.
144. **By November 2020, we will have conducted an analysis of the needs of our senior civil servant community.** Our objective is to understand what would make the difference in increasing the abilities, skills and confidence of senior officials and therefore what the most impactful new interventions will be. Based on the need, we

plan to identify an appropriate supplier to develop and, from June 2021, implement new learning material. We are also reviewing our approach for senior civil servant inductions.

145. We intend to measure success through training attendance and completion rates, average knowledge and confidence improvement scores of attendees, and ministerial private office feedback on the quality of advice that ministers receive.
146. Each year, a People Survey is conducted across the Civil Service, which is publicly available on [GOV.UK](https://www.gov.uk). As part of measuring the longer-term impact of our activity on the culture of the department, we will focus on survey scores regarding actions of senior managers being consistent with the Home Office's values, role modelling by managers of the behaviours set out in the Civil Service Leadership Statement, and scores on how safe staff feel it is to challenge how things are done in the Home Office.

---

### Recommendation 25 – Improve submissions for ministers and Permanent Secretaries

All policy submissions and advice to ministers should have mandatory sections on: a) risks to vulnerable individuals and groups and b) equalities, requiring officials to consider the effect of their proposals in these terms. The department should review the effectiveness of its current processes and criteria for escalating significant policy submissions for approval by the Permanent Secretary or Second Permanent Secretary. Where necessary new processes and criteria should be established.

---

147. To ensure that ministers can easily consider the equalities impacts of every policy proposal, in August 2019 **we updated the submissions template** – the document that officials use to provide advice to ministers and Permanent Secretaries. **Officials must now explicitly confirm if an EIA has been completed.** They must clearly set out any relevant concerns that arise and provide recommendations to address them, or explicitly say that they do not consider there is a need to consider any further equalities information.
148. Further work is underway on two parts of this recommendation: we are consulting on the definition of vulnerable individuals and groups before we update the submissions template to ensure consideration of vulnerability, which we expect to do later this year. We are also reviewing the processes and criteria for escalating major policy submissions for Permanent Secretary or Second Permanent Secretary approval.
149. We will measure success through the sampling of submissions to ministers to check whether risks to vulnerable individuals and groups, and equalities, have been appropriately considered.

---

## Recommendation 26 – Create a central archive to record submissions and minutes

The department should put in place processes to support the use of the electronic archive to record all departmental submissions, minutes, and decisions centrally so there is a clear audit trail of policy deliberations and decisions. The department should ensure staff are provided with guidance on the knowledge and information management principles in respect of their work with/support for ministers. This archive should enable users to search for key terms, dates and collections on particular policy risks or issues.

---

150. The Home Office faces challenges in locating key information and data quickly and completely. Information is held in multiple locations and databases, including personal hard drives and emails, which limits searching facilities and makes it difficult to show the audit trail between documents, submissions, and decisions. Moreover, where decisions have been made verbally, they may have been recorded inadequately or inaccurately.
151. To address this, we are **improving both systems and behaviours**. In 2019, **the Home Office started to use a new Electronic Document Management System** (SharePoint M365) to enable the department to record all submissions, minutes, notes, and decisions. This is necessary to enable a clear and easily accessible audit trail of policy deliberations and decisions. Approximately 8,000 members of staff now use this system and all staff are expected to be using it within 6-12 months.
152. **Guidance and best practice are being developed to ensure that staff use the archive effectively**. Ministerial Private Offices are revising their processes to manage submissions. The programme of work to embed Information Management best practice, to reflect the importance of developing culture and behaviours in addition to core information management skills, began in September 2020 and is expected to continue until March 2021.
153. Our proposed measures of success include samples of the number or percentage of submissions that are saved using the Electronic Document Management System, and metrics showing a substantial increase in its use.

## Going beyond the recommendations

154. Policy officials receive formal and on-the-job training in policy advice, and extensive advice is available on internal intranets and online. We are building on that and making it easier for officials to find advice on and ensure that they are following best practice. In October 2020 we will launch the **Policy Profession Policy Tests**, which draws on best practice externally and from within government, to push policymakers to engage and reflect critically throughout their work. The Policy Tests will be accompanied by a one-page summary document, which will act as a valuable prompt to policy officials on key questions they need to consider when developing policy. These are designed to help officials develop policy in an effective, thoughtful, and inclusive way consistent with the Home Office values and policy best practice, factoring in the cultural and historical context, and with effective mechanisms to monitor concerns.
155. **The Home Office is making increasing use of 'Shadow Boards'**. These are boards that comprise colleagues below Senior Civil Servant level from a wider range of backgrounds. They consider the papers to be put to the main governance boards, and then contribute their thoughts and influence the discussion. These Boards provide challenge and alternative perspectives directly to senior decision-makers. For

example, there is a shadow Race Board, while the BICS Management Board and the Home Office Management Board shadow boards have provided critical challenge to this Comprehensive Improvement Plan and to other aspects of the recommendations, including the success measures.

156. As part of the changes to how the department works in response to COVID-19, **new mechanisms have been introduced to enable middle and senior management to raise concerns directly with Permanent Secretaries and Director Generals on a weekly basis**, and regularly to ministers themselves. Permanent Secretaries continue to host sessions for all officials, from joining staff race and religious networks' meetings, to holding regular coffees with small groups to get more personal feedback.
157. While top down decisions and guidance from senior officials and ministers is important, **for change to be genuinely transformative and long-lasting it needs to include all staff**. The Windrush Lessons Learned Review lessons for policymakers focused primarily on the immigration system, but we are learning and applying lessons across the four main policy directorates. Following the publication of the Windrush Lessons Learned Review, officials in every part of the Department held 'Windrush Conversations' to reflect upon the events and findings, and to consider how to apply lessons to their own areas. Teams in areas as distinct as Modern Slavery, Policing, and Counter-Terrorism are analysing and proposing recommendations for how they could do things differently, and we are sharing best practice across the department.
158. We have supported the EHRC review of how the Home Office fulfilled its Public Sector Equality Duty obligations when taking actions that affected the Windrush generation, and how we can further strengthen our work on equalities. Full details of the EHRC review will be published in October. **We will work closely with the EHRC to introduce further improvements to our policy-making processes**. We anticipate working with them on three areas to help us better:
- understand: improve the way we identify and gather information to help us understand the potential and actual impacts on vulnerable groups;
  - act: improve the way that we use equality information to inform decisions at each stage of policy formation, implementation and review; and
  - embed – strengthen the culture and training around equality considerations at all levels of the organisation.
159. We are also supporting the **Policy Apprenticeship scheme**, designed to recruit policymakers from a broader range of backgrounds, with 42 apprentices already in post and a further 27 planned for the 2020/21 intake.

## Theme Success

160. Meeting the full spirit of the review will require a step-change in the culture of how we approach policymaking. We want to create a culture where consideration of all the issues covered in this response is a natural part of policy development from start to finish for ministers and officials. Success in this theme will mean that the Home Office is seen as a leader across the Civil Service in how the equalities impacts of government policies are considered and how we develop policies.

## Theme 4: Openness to Scrutiny

### Progress so far and work underway

#### We have:

- Set up a range of external engagement forums, including EU Settlement Scheme user groups, a Future Border and Immigration System /Vulnerability group, and Modern Slavery Strategy Implementation Group.
- Established a new Borders, Immigration and Citizenship System (BICS) complaints board to provide consistency and oversight.
- Incorporated regular feedback from service users into the design and delivery of UKVI and Her Majesty's Passport Office (HMPO) contracts and operations – from Asylum Support Accommodation to shaping the delivery of a world-class customer service for our passport customers.
- Listened to refugees who are building their lives in the UK, for example through our Refugee Advisory Group, ethnographic and qualitative research, and conversations with those affected.

#### We are:

- Involving communities and stakeholders in all our policy development and implementation.
- Reviewing the role of the Independent Chief Inspector of Borders and Immigration (ICIBI) with a view to making it more independent and efficient. We will also introduce an independent complaints examiner function.
- Establishing an internal Community and Stakeholder Engagement Hub to play a major role in delivering our ambition to become a more outward facing department by strengthening our capability and capacity to work with stakeholders

161. This theme is about ensuring that the Home Office is an outward-facing department that listens to, and acts on, the views and challenges of both staff and external stakeholders. This includes greater external scrutiny of policy and processes and the ability of staff to air their views and concerns. We are taking steps to be more transparent to ensure that the department is as open as possible to all types of scrutiny, both internal and external. This requires a fundamental cultural shift in our attitude to people with different views on policy and those who make a complaint when something goes wrong, but we are committed to building an open Home Office which prioritises the insights and experiences of the communities we serve.

---

## Recommendation 8 – Improve external understanding and engagement

The Home Office should take steps to understand the groups and communities that its policies affect through improved engagement, social research, and by involving service users in designing its services. In doing this, ministers should make clear that they expect officials to seek out a diverse range of voices and prioritise community-focused policy by engaging with communities, civil society and the public. The Windrush volunteer programme should provide a model to develop how the department engages with communities in future. The same applies to how it involves its staff in feeding back their information and knowledge from this engagement to improve policy and the service to the public.

---

162. We are taking steps to ensure we consistently involve communities and stakeholders in policy development and service design by building the department's skills and confidence in conducting meaningful engagement. We plan to develop training on community engagement to improve our staff's abilities in this area. We will systematically identify who the stakeholders or impacted groups are across different business areas, assessing the degree of current engagement, and developing a strategy to improve this. To support the development of these strategies, we will conduct a new stakeholder survey to better understand the effectiveness of our engagement. To lead the way on community and stakeholder engagement we are forming a Community and Stakeholder Engagement Hub that will sit at the very centre of the department.
163. We have developed a **customer data and evidence database** for policymakers, signposting relevant information to inform decision-making. It will also help us identify and address our most critical data gaps.
164. We are engaging with Windrush volunteers (staff who assisted in engagement events to promote the Windrush Compensation Scheme and helped to shape the engagement strategy with affected communities) to understand what went well and how we can build this approach into our wider work.
165. UKVI and HMPO are incorporating regular feedback from service users into the design and delivery of our contracts and operations – from Asylum Support Accommodation to shaping the delivery of a world-class customer service for our passport customers. UKVI is also listening to refugees who are building their lives in the UK, for example through our Refugee Advisory Group, ethnographic and qualitative research, and conversations with those affected. Collaboration with civil society groups and activists has been at the heart of our resettlement and community schemes within UKVI.
166. To monitor our progress, we initially plan to take dip samples of advice that is submitted to ministers to check that officials are engaging with communities and a diverse range of voices throughout policy development. As the initiatives associated with this recommendation are developed further, we will identify additional appropriate measures to hold ourselves to account.

### **Recommendation 9 – Introduce a Migrants’ Commissioner**

The Home Secretary should introduce a Migrants’ Commissioner responsible for speaking up for migrants and those affected by the system directly or indirectly. The commissioner would have a responsibility to engage with migrants and communities and be an advocate for individuals as a means of identifying any systemic concerns and working with the government and the ICIBI to address them.

---

167. We agree that this would be a valuable role, to engage with migrant communities directly and facilitate their feedback into the Home Office to be considered in our policy development and operational activity.
  168. We are consulting with the Windrush Cross-Government Working Group to recommend how best to advance this recommendation, including which external voices to engage with.
  169. The success of this recommendation is likely to be judged by the quality of the feedback and its impact on the work of the department. We may also survey migrants to assess the effectiveness of our approach.
- 

### **Recommendation 10 – Review the remit and role of the Independent Chief Inspector of Borders and Immigration (ICIBI)**

The government should review the remit and role of the Independent Chief Inspector of Borders and Immigration (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 ICIBI should work closely with the Migrants’ Commissioner to make sure that systemic issues highlighted by the commissioner inform the inspectorate’s programme of work.

---

170. We will seek to appoint an independent reviewer this year and plan to carry out a full review of the ICIBI in the first quarter of 2021 with a view to making the ICIBI more independent, effective and efficient. The review will consider the capabilities, organisational structure, role and remit of the ICIBI, as well as considering whether to establish a duty on the Home Office to explain why it is not accepting recommendations.
171. Through the review we will look at how other independent inspectorates are funded, their ways of working and how other Home Office assurance functions operate. We have discussed the issues raised in the report and the specifics of this recommendation with the incumbent Independent Chief Inspector to gain insight from his experience.
172. We will then use the findings of the review to consult on changes to the ICIBI. Where formal scrutiny is not working, we will not hesitate to make further changes.
173. We expect to judge whether the changes to the role and remit of the ICIBI have been successful by the percentage of responses to reports completed within expected timeframes, and the number of recommendations implemented.

---

## Recommendation 20 – Commission a review of the Borders, Immigration Citizenship and System (BICS) complaints procedure

The Home Secretary should commission an urgent review of the BICS complaints procedure. Options could include establishing an Independent Case Examiner as a mechanism for immigration and nationality applicants to have their complaints reviewed independently of the department.

---

174. We understand the need to make further improvements to the BICS complaints system by providing robust, independent assurance and **will create an Independent Complaints Examiner function**. This will enable customers to escalate their complaint to the Independent Complaints Examiner if they are dissatisfied with the handling of it by our internal complaints system. The examiner will be able to review the administration of the complaint, including the timeliness and quality of the Home Office's response and make recommendations for improvement.
175. These improvements will build on changes already made in response to recent ICIBI inspections, National Audit Office recommendations and Home Affairs Select Committee findings. We have accepted the majority of these, including:
- the nomination of a senior official with the responsibility for ensuring each complaint handling team is regularly achieving the Customer Service Standard;
  - publishing lessons learned from the complaints received every quarter and the changes and improvements made as a result;
  - carrying out a new survey of MPs on the department's handling of complaints raised by MPs and their offices.
176. We are working with the **Government Internal Audit Agency** who are assisting us to establish the Terms of Reference for the review and advising us on improvements, including how best to establish the Independent Complaints Examiner function.
177. Whether our changes to the complaints system have succeeded will be measured through both customer and MPs satisfaction survey results.
- 

## Recommendation 23 – Revise and clarify the risk management framework

The department should revise and clarify its risk management framework, where officials and ministers consider potential risks to the public, as well as reputational and delivery risks.

---

178. We are overhauling the department's risk management framework to focus on Windrush Lessons Learned Review-related activities including the **re-launch of a department-wide Risk and Assurance Forum**. This is designed to ensure that staff at all levels have the knowledge and responsibility to act upon risks that are identified.
179. In August 2020 we completed an initial consultation on proposals for the new framework with both the department's risk management practitioners and risk experts in other parts of government. A consultation on the new framework will be released by the end of September which will set out new expectations and seek input from staff and customers about transforming our risk system. This will then support a

longer piece of work to identify and deliver the behavioural changes required to make a new framework effective. We hope to formally launch the new framework in December 2020, following the consultation period.

180. The success of the new framework will be monitored through an increase in the number of risks and early warning signs identified and acted upon, as well as a rise in staff confidence levels in raising concerns and risks.

## Going beyond the recommendations

181. The Home Secretary has made clear her intention to make the Home Office more outward facing and to ensure that we take account of the views of external stakeholders. During her statement to Parliament in July 2020, she noted that:

*“I expect my officials to engage with community organisations, civil society and the public, and I will be looking for evidence of this in every piece of advice that ministers receive. Wendy Williams was clear that a lack of insight into the community’s experience meant that the Home Office missed opportunities to anticipate the Windrush scandal.”*

182. A **Community and Stakeholder Engagement Hub** will be formed within the Home Office, to lead the way in engagement and interaction with our stakeholders and communities. The hub will also be an accessible and proactive centre of excellence for knowledge and expertise that will help enable the department to undertake more successful and effective stakeholder management.

## Theme success

183. To succeed, our work under this theme must result in major improvements to how the department formulates policy by ensuring diversity of thought and experience and ensuring the impacts on different communities are rigorously examined. Better relationships with stakeholders and ongoing external input into our work will ensure that the department is more responsive, and that communities and stakeholders feel listened to and are confident about the work of the Home Office.
184. Risks to the public that develop following the implementation of a policy will be picked up and addressed quickly, and staff on the frontline will have the confidence to raise concerns and know these will be listened to. Unlike during the Windrush scandal, where early warning signs were missed or ignored, we will be able to identify high-impact issues bubbling under the surface before it is too late. When somebody does raise a complaint against the Home Office, they will be treated with respect and have their complaint handled efficiently, hopefully have it resolved successfully, and any learning will improve our processes and culture.

## Theme 5: An Inclusive Workforce

### Progress so far and work underway

#### We have:

- Refreshed and relaunched our internal race action plan with a dedicated team to support the delivery. The refreshed plan includes clearer measures on how we aim to deliver on our ambition to improve the lived experiences of black, Asian and minority ethnic staff.
- Consulted widely with a diverse range of internal stakeholders from all parts of the UK and grades, to establish how the current Inclusive by Instinct strategy is used, and to identify areas for inclusion in a new Home Office strategy.
- Commissioned a comprehensive training needs analysis that will inform the development of a diversity and inclusion training package.
- Implemented a new process to capture and learn lessons following successful employment tribunal claims relating to race discrimination, harassment and victimisation.

#### We are:

- Refreshing the Home Office strategic race advisory board by autumn 2020 which will include external experts on race and immigration.
- Producing a new diversity and inclusion strategy with high level strategic objectives which will be published by the end of the year.
- Developing and implementing a revised comprehensive diversity and inclusion training programme for all staff by autumn 2021.

185. The Home Office develops and delivers policies and services that affect the lives of people across the UK and beyond. To ensure that we carry out our functions effectively and fairly, the Home Office must represent modern Britain in all its diversity.
186. Having more racial diversity across the department, and among our senior leaders, will not only ensure greater insight into the lived experiences of the diverse UK population but will also provide more diversity of thought, including greater challenge and innovation, in respect of the policies in which we develop and in our daily operational practices.
187. As part of this theme, we want our staff to understand that there is no room for discrimination – direct or indirect – in the policies that we develop and in our interactions with each other and the wider public. It is vital therefore that we improve staff understanding and appreciation of diversity and inclusion principles, and their relevance to effectively performing their duties as public servants. This will ensure greater objectivity and maturity in the work that we deliver as a department.

### Recommendation 27 – Establish a strategic race advisory board

The department should establish an overarching strategic race advisory board, chaired by the Permanent Secretary, with external experts including in relation to immigration and representation from The Network to inform policymaking and improve organisational practice.

---

188. We are proud to be currently the most ethnically diverse Civil Service department by percentage at almost quarter of all staff. However, as we approach the more senior grades, representation is not as strong as we want it to be. We have an existing target for our SCS to be 12% black, Asian and minority ethnic.
  189. The strategic race advisory board, chaired by the Permanent Secretary, will ensure that diversity remains a priority. The board will enable the highest level of challenge, innovation and scrutiny to ensure that we do more to embed ethnic diversity in the Home Office.
  190. **We have changed the membership and terms of reference for the existing race board to re-set its objectives** in line with the overall intent of the recommendation. **We are now looking to recruit external experts** who will support the department in driving forward improvements to organisational practice and the lived experience of black, Asian and minority ethnic staff. We aim to convene the newly revised strategic race advisory board in autumn this year.
  191. We will judge the overall success of the board through monitoring performance against the objectives of the Home Office race action plan and its measurable outcomes of representation and lived experience of black, Asian and minority ethnic staff. This will be measured by using the Home Office race data dashboard to hold Director Generals and their senior management to account for tangible outcomes using their own directorate level performance data and objectives in each of their business areas.
- 

### Recommendation 28 – Revise the diversity & inclusion strategy

Subject to relevant statutory provisions, such as s10 Constitutional Reform and Governance Act 2010, the department should revise its Inclusive by Instinct diversity and inclusion strategy to include its aspirations for senior-level Black, Asian and minority ethnic representation and a detailed plan for achieving them. Action should form part of a coherent package with ambitious success measures and senior-level ownership and accountability. The department should publish comprehensive annual workforce data, so it can monitor progress.

---

192. It is widely acknowledged that there is an under-representation of black, Asian and minority ethnic people in the senior Civil Service within the department, and there is diminishing representation progressively through the more senior grades. **We are developing and implementing a new diversity and inclusion strategy.** The new strategy will not only set out our ambitions to lead the way in the field of diversity and inclusion but will also include clear plans and measurable objectives on how we intend to deliver on our ambition. Underpinning this work, we are completing an audit into the impact and effect of, and our progress against, the current Inclusive by Instinct Strategy.

193. In relation to the publication of workforce data, we are setting up a diversity and inclusion data and evidence excellence working group. This group will drive forward best practice in the department and ensure a shared consistent picture for improved performance and increased accountability. The group will also produce a set of recommended metrics (to be published annually) to the Diversity and Inclusion Steering Group, chaired by the second Permanent Secretary. We anticipate the first tranche of data will be published by the end of 2020, meeting the commitment to publish comprehensive workforce data. A second tranche will go above the recommendation to measure progress against strategy objectives. This will be released in 2021 following the development of interventions which underpin the new strategy.
194. Finally, we will publish a plan to address senior-level black, Asian and minority ethnic under-representation by the end of 2020. This will be drawn from the race action plan commitments, and activity across the department including from our leadership Race Champions and The Network, the Home Office's race equality staff support group.

---

### Recommendation 29 – Review diversity and inclusion and unconscious bias training

The department should:

- a) review its diversity and inclusion and unconscious bias awareness training (over and above the mandatory civil service online courses) to make sure it is consistent with achieving the objectives of the Inclusive by Instinct strategy and that it is designed to develop a full understanding of diversity and inclusion principles, and the principles of good community relations and public service
- b) produce a training needs analysis & comprehensive diversity & inclusion training plan for all staff
- c) provide refresher training to keep all current and new staff up to date
- d) involve other organisations, or experts in the field of diversity and inclusion in its design and delivery
- e) set and then publish standards in terms of its diversity and inclusion training aims and objectives
- f) monitor learning and development regularly to test implementation and whether it is achieving its strategic objectives
- g) carry out regular “pulse” surveys to test the effectiveness of the implementation of these measures.

---

195. **We are also conducting a fundamental review of our diversity and inclusion training offer** in the Home Office, over and above the current Civil Service e-learning programme.

196. **We will conduct a comprehensive training needs analysis** to understand the current organisational levels of maturity and capability for taking individual responsibility to foster diversity and inclusion. Our approach will cover, but is not limited to, baselining knowledge of protected characteristics and other markers of identity not covered in the Equality Act 2010.

197. From November this year, we will use external expertise alongside the insights gathered from the needs analysis to develop additional learning materials. **The resulting programme of training, to be available for all new and existing Home Office staff by autumn 2021**, will support the department to achieve our diversity and inclusion strategic ambitions.
198. We plan to judge the overall success of the new learning offer through the monitoring of completion rates and an assessment of average knowledge improvement scores.

---

### Recommendation 30 – Review successful employment tribunal claims

The Home Office should regularly review all successful employment tribunal claims that relate to race discrimination, harassment or victimisation, and in particular a summary of every employment tribunal judgment finding against the Home Office of race discrimination should be emailed to all SCS within 42 days of the decision being sent by the tribunal together with a note stating whether an appeal has been instituted. The same arrangements should be made for Employment Appeal Tribunal, High Court, Court of Appeal or Supreme Court judgments within 28 days. It should use any learning to improve staff and leadership training, and to feed back to the senior civil service.

199. **We have set up a reporting process to share and embed lessons learned from all discrimination, harassment or victimisation claims that affect all protected characteristics, including race.** This new process will also capture lessons in respect of claims that are settled early and/or withdrawn and trends in mediation cases where race, discrimination, harassment or victimisation is a factor in the overall claim. We have also ensured that any learning from internal grievance claims are captured.
200. In parallel, we are setting up an employment tribunal working group with responsibility for overseeing the implementation and embedding of lessons while improving staff and leadership training across the department.

## Going beyond the Recommendations

### Increasing diversity and improving the lived experience of our staff

201. **In July 2020 we refreshed and re-launched our internal race action plan.** Its objectives are to:
- increase representation of black, Asian and minority ethnic colleagues at all grades and in all regions particularly in the Senior Civil Service
  - improve the lived experience of black, Asian and minority ethnic colleagues
  - develop a better understanding of the communities and society that we serve and work among, to improve the way we deal with race issues in our policies and operations, in keeping with the Public Sector Equality Duty.
202. We are already started delivering these objectives. For example, we have:
- commissioned a review of the existing performance management system due to the disproportionate negative impact on black, Asian and minority ethnic colleagues. The ambition is for a future system that will be fairer, more transparent and less subjective, in keeping with lessons learned from other government departments.

- launched a sponsorship programme for black, Asian and minority ethnic staff.
- delivered a series of innovative “Let’s Talk about Race” workshops in partnership with the organisation Business in the Community (BITC).
- facilitated dedicated sessions for black, Asian and minority ethnic staff to discuss their experiences of working in the department.
- developed a pool of black, Asian and minority ethnic independent recruitment panel members to support diversity within recruitment.
- launched a further black Asian and minority ethnic Women’s Leadership Summit for 20 female members of staff.
- setup a network of senior Civil Service champions covering all strands of the diversity and inclusion strategy, to support and deliver the Home Office I Inclusive by Instinct Strategy and other associated activities.

## Training

**203. We have actively encouraged all Home Office staff to complete existing online Civil Service e-learning, on diversity and inclusion and a separate race awareness package**, as a baseline. We have significantly increased completion rates on the current diversity and inclusion e-learning packages. We will continue to encourage staff to complete the race awareness and diversity and inclusion training in the coming months and beyond.

## Theme Success

- 204.** We will act to ensure that the workforce is truly representative of the modern and diverse society in which we serve. By September 2021 we will have increased representation of black, Asian and minority ethnic colleagues at all grades and in all regions – particularly in the senior Civil Service contributing to greater diversity of thought leading to improved leadership, decision-making, and overall governance throughout department.
- 205.** By autumn 2021 we will have developed and implemented a new suite of training to support staff across the department to understand the importance of workplace diversity and inclusion and how it can improve the way in which we – as public servants – successfully deliver our wider objectives on behalf of the diverse UK population.

# Annex A: The Windrush Cross-Government Working Group

The Windrush Cross-Government Working Group was announced by the Home Secretary, Priti Patel, on 22 June 2020.

The Windrush Cross-Government Working Group brings together community organisations with government representatives to support the delivery of practical solutions to address challenges affecting the Windrush generation and their families.

The purpose of the Windrush Cross-Government Working Group is to:

- improve uptake of the Windrush Schemes (the Windrush Scheme and the Windrush Compensation Scheme), through advising the Home Office on its strategic approach to engagement and outreach; advising on the design and delivery of the Windrush Schemes Community Fund, and making decisions on recommendations to the Home Secretary on successful bids
- provide strategic input into the Home Office response to the Wendy Williams Lessons Learned Review
- co-design and deliver the response to cross-cutting issues to provide wider support to the Windrush generation and their descendants
- support the design and delivery of practical solutions to address the wider challenges that disproportionately affect people from black and wider minority ethnic backgrounds

To deliver on these priorities, the working group is underpinned by the following series of sub-groups which will focus on specific themes and deliver more targeted actions:

- 1) Windrush Community Funds and Windrush Schemes
- 2) Implementation of the Windrush Lessons Learned Review
- 3) Collaboration with the Commission on Race and Ethnic Disparities

Representatives from government departments also attend the sub-groups.

Further details including Terms of Reference, membership, and biographies are available on [GOV.UK](https://www.gov.uk)

## Annex B: Glossary

<b>Border, Immigration and Citizenship System (BICS)</b>	Overarching term for the UK Visas and Immigration, Immigration Enforcement, Border Force, HM Passport Office, and BICS Policy International.
<b>Border, Immigration and Citizenship System (BICS) Hub</b>	Formed to develop new ways of working within BICS, to become better equipped to anticipate and respond to high profile issues.
<b>Business in the Community (BITC)</b>	Business in the Community is a business-led membership organisation dedicated to responsible business.
<b>Civil servants</b>	Career public servants who work in central government departments, agencies, and non-departmental public bodies. Also referred to as “officials”.
<b>Commission on Race and Ethnic Disparities</b>	An independent cross-government Commission which examines inequality across the whole population of the UK.
<b>Commonwealth, the</b>	The Commonwealth of Nations, a political association of currently 54 countries, predominantly made up of former territories of the United Kingdom.
<b>Compliant environment</b>	A series of policy interventions underpinned by legislation to ensure that only those legally entitled to do so are allowed to work, rent property in the private rental sector, drive (including holding a driving licence), hold a current account, access healthcare, or access public funds. This set of interventions was previously described as the “hostile environment”.
<b>Equalities and Human Rights Commission (EHRC)</b>	A non-departmental public body responsible for promoting and upholding equality and human rights ideals and laws across England, Scotland and Wales.
<b>Equality Impact Assessment (EIA)</b>	These are assessments that public authorities often carry out prior to implementing policies, with a view to predicting their impact on equality. The <i>Equality Act 2010</i> does not specifically require them to be carried out, although they are a way of facilitating and evidencing compliance with the Public Sector Equality Duty.
<b>Front-End Customer Service Points (FES Points)</b>	A service that allows the majority of UKVI service users to complete their immigration application by submitting biometric data and supporting evidence at points across the UK.
<b>Government Internal Audit Agency (GIAA)</b>	An executive agency of HM Treasury established to improve the quality of internal audit provided to central government, helping departments manage public money more effectively through better governance, risk management and internal controls.

<b>Historical Cases Review</b>	A Home Office review of 11,800 individual case files of migrants of Caribbean Commonwealth nationality who could have been born before 1 January 1973, who have been removed or detained by the Home Office since 2002, which identified 164 individuals.
<b>Her Majesty’s Inspectorate of Constabulary and Fire &amp; Rescue Services (HMICFRS)</b>	An independent inspectorate for police forces, and fire and rescue services.
<b>Her Majesty’s Revenue &amp; Customs (HMRC)</b>	A non-ministerial department of the UK Government responsible for the collection of taxes, the payment of some forms of state support and the administration of other regulatory regimes.
<b>Hostile environment</b>	See “Compliant Environment”.
<b>Illegal immigration</b>	The migration of people into a country in violation of the immigration laws of that country, or the continued residence of people without the legal status to live in that country.
<b>Independent Chief Inspector for Borders and Immigration (ICIBI)</b>	The independent inspectorate for the Home Office’s borders, immigration and citizenship functions.
<b>Law Commission</b>	An independent statutory body that seeks to keep the law of England and Wales under review and to recommend reform where it is needed.
<b>National Audit Office (NAO)</b>	An independent parliamentary body that scrutinises government spending.
<b>NETWORK, the</b>	The Home Office’s Race Equality staff support group.
<b>Office of the Children’s Champion</b>	A Home Office team responsible for promoting the section 55 child safeguarding duty across BICS, as well as the wider department’s safeguarding responsibilities to children and vulnerable adults.
<b>Officials</b>	A term used to refer to civil servants, to differentiate them from Ministers or Special Advisers (e.g. “Home Office officials” or “senior officials”).
<b>Permanent Secretary</b>	The most senior civil servant in a government department.
<b>Public Sector Equality Duty (PSED)</b>	The requirement for public sector organisations to have due regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010.
<b>Race Board</b>	The Home Office Race Board includes senior level Race champions from every part of the Home Office, as well as The Network Chair. The group is responsible for the strategic delivery of the Home Office Race Board action plan.

<b>Race Champions</b>	Home Office civil servants who act as a role model and champion within their respective teams and support the department in delivering on its plans set out in the diversity and inclusion strategy.
<b>Regulatory Impact Assessment</b>	A regulatory impact assessment is used to inform policy decision-making. All interventions are subject to proportionate and rigorous assessment of impacts following the Small Business Enterprise and Employment Act 2015.
<b>Risk and Assurance Forum (RAF)</b>	A forum for risk management practitioners to gain knowledge on risk related matters with the opportunity to discuss further and provide feedback.
<b>Safety Valve Mechanism (SVM)</b>	A virtual community of experts from across Immigration Enforcement (IE) who give advice, monitor trends and work with policy to learn from cases to improve future responses.
<b>Senior civil servant (SCS)</b>	Very senior managers within the civil service, making up approximately 0.8% of all civil servants.
<b>Submission</b>	Formal advice to Ministers, or requests for approvals and authorisations, are set out in a written submission, based on a word document template with stringent control and clearance processes.
<b>UK Visas and Immigration (UKVI)</b>	A Home Office department that is responsible for deciding applications for status from foreign nationals, including on human rights, nationality and citizenship, and asylum grounds.
<b>UK Visas and Immigration (UKVI) Chief Caseworker Unit (CCU)</b>	A unit within UK Visas and Immigration with a focus to empower decision makers to make fair and objective decisions.
<b>UK Visas and Immigration (UKVI) Professionalisation Hub</b>	Part of the Chief Caseworker Unit, which seeks to professionalise casework.
<b>Vulnerable Persons Team (VPT)</b>	A Home Office team that provides specialist support to members of the Windrush cohort, including financial support through urgent and exceptional circumstances.
<b>Wendy Williams</b>	HM Inspector of Constabulary and HM Inspector of Fire & Rescue Services, appointed as the independent adviser to the Windrush Lessons Learned Review by former Home Secretary Sajid Javid in May 2018.
<b>Windrush</b>	HMT Empire Windrush, the ship which brought over a number of migrants from the Caribbean after the 1948 Nationality Act, and which lends its name to the Windrush generation.

<b>Windrush Compensation Scheme</b>	A Home Office scheme intended to provide financial payments to members of the Windrush generation, or their descendants, heirs or close family members, who did not have the right documentation to prove their lawful right to live in the UK and suffered losses or impacts on their life as a result.
<b>Windrush Cross-Government Working Group</b>	The Windrush Cross-Government Working Group brings together community organisations with government representatives to support the delivery of practical solutions to address challenges affecting the Windrush generation and their families, as well as provide strategic input into the Home Office response to the Windrush Lessons Learned Review.
<b>Windrush generation</b>	Refers specifically to migrants from the British West Indies after the Second World War.
<b>Windrush Help Team</b>	A Home Office team set up to offer support and guidance to individuals on the Windrush Compensation Scheme and Windrush Scheme and how to apply. Formerly called the Windrush Taskforce.
<b>Windrush Lessons Learned Review (WLLR)</b>	An independent assessment of the events leading up to the Windrush issues (particularly from 2008 to March 2018) and which identifies the key lessons for the Home Office going forward.
<b>Windrush Scheme</b>	A Home Office scheme set up to provide documentation of status and citizenship to individuals who settled in the United Kingdom before 1 January 1973 but do not have documentation to prove this.
<b>Windrush Taskforce</b>	See “Windrush Help Team”.



HM Government

CCS0820050750  
978-1-5286-2136-6