

OFFICE OF THE
IMMIGRATION SERVICES
COMMISSIONER



**Office of the
Immigration Services
Commissioner:**

**Business Plan
2021/22**

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Contents

- 1 Introduction
- 2 About the OISC
- 3 Our vision
- 4 Our strategic objectives
- 5 Business plan activities
- 6 Our development programme
- 7 Our resources

1. Introduction

The Office of the Immigration Services Commissioner (OISC) 2021/22 Business Plan sets out our priorities and how we will deliver our services for 2020/21. It supports the delivery of [OISC three-year Corporate Plan \(2020-23\)](#) which provides the strategic framework for this Business Plan.

2. About the OISC

Led by the Immigration Services Commissioner, the Office of Immigration Services Commissioner (OISC) is an Arm's Length Body of the Home Office. Our statutory duties are set by the Immigration and Asylum Act 1999 and include regulating immigration advice and services across the UK. We are currently funded through a grant in aid budget of £3.82m, with 60 employees and based in London, regulating over 3,000 individual immigration advisers and 1,600 organisations. (Advice provided by solicitors and barristers falls outside of OISC's authority and is regulated by the Solicitors Regulation Authority and the Bar Standards Board).

We are responsible for making sure that everyone who is seeking immigration advice from OISC regulated advisers receives good and reliable advice and are protected from the risks and dangers of illegal advice or poor service. This is done by promoting good practice to immigration advisers, setting standards and making sure those standards are upheld. Specifically, it includes:

- assessing and registering those who want to be an immigration adviser
- auditing the performance of advisers ensuring standards are maintained
- managing and investigating complaints against immigration advisers
- identifying and taking enforcement action against those who provide poor service or immigration advice illegally
- overseeing those who regulate immigration advice by solicitors and barristers in Scotland and Northern Ireland where the legal systems are different

3. Our vision

Our Corporate Plan 2020 – 2023 sets out the OISC's vision that every person seeking immigration advice within the UK

- makes an informed choice to seek advice only from a regulated immigration adviser
- receives reliable and professional advice and service that they have confidence and trust in

To achieve this, it is our mission to be an enabling regulator, connecting the advice seeker with reliable advice.

4. Our strategic objectives

Our Corporate Plan 2020-2023 sets out six strategic objectives that provide the framework for how we will achieve our mission. These are:

Promote

Ensure advice seekers and those around them know how and why to access advice from a regulated adviser

Collaborate

Collaborate with others to create a system that is transparent and easy to understand

Regulate

Create a world class advisory system where good practice is the norm for all OISC regulated immigration advisers.

Protect

Protect advice seekers, taking action against poor advice, exploitation and criminal activities

Develop

Reform the OISC into a modern and engaging organisation, geared to meet the needs of advice seekers in the 2020s

Enable

Provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value.

5. OISC 2021/22 business plan priorities

The following pages set out the OISC's priority outcomes and objectives for 2021/22 which support the delivery of the strategic objectives. Throughout 2021/22 we will hold ourselves to account and monitor our progress against these objectives and measures.

Objective 1: Promote

We will ensure advice seekers and those around them know how and why to access advice from a regulated adviser

Priority area	Outcome	Outputs / Measures	Objectives
Inform	Stakeholders have a greater awareness of the OISC, its purpose and regulatory impact	<p>Positive stakeholder feedback on new OISC corporate identity.</p> <p>Increase in positive website experience through user feedback.</p> <p>Increase social media engagement for Twitter, Facebook and LinkedIn.</p> <p>Monthly report on number of press releases, newsletters and social media engagement.</p>	<p>Establish an accessible, consistent, and recognisable corporate identity that accurately reflects the OISC's vision, mission and values.</p> <p>Increase audience reach through effective and accessible digital communication channels.</p> <p>Demonstrate the effectiveness of OISC regulatory impact (regulation and enforcement) to relevant stakeholders.</p>
Educate	Advice seekers know to go to the OISC to find an immigration adviser and complain about poor or illegal immigration advice	<p>10% increase in OISC website traffic to pages targeted at advice seekers.</p> <p>10% increase in OISC adviser finder and adviser register users (check measures) (benchmark April 2021)</p> <p>20% increase in website traffic to complaints pages on OISC website (benchmark April 2021)</p>	<p>Increase awareness of the importance of using a registered immigration adviser amongst migrant communities.</p> <p>Increase awareness of the OISC's adviser finder and adviser register.</p> <p>Increase awareness amongst advice seekers of how to complain about poor or illegal immigration advice for both regulated and unregulated advisers.</p> <p>Ensure public facing content is accessible, transparent, and easy to understand.</p>

Objective 2: Collaborate

We will collaborate with others to create a system that is transparent and easy for the advice seeker to understand and navigate.

Priority area	Outcome	Outputs / Measures	Objectives
Engage	OISC has a comprehensive understanding of its stakeholders and partners	Stakeholder feedback from engagement activities.	Identify contacts for all priority organisations at a national and regional level. Understand the views of and interest in the OISC and its activities from priority stakeholders.
	OISC stakeholders have knowledge and trust in its vision, mission and strategic objectives	Positive stakeholder feedback from engagement activities.	Increase in stakeholder awareness and confidence in the OISC's vision, mission and objectives. Gain stakeholder feedback and input into OISC vision and development programme activities.

Objective 3: Regulate

We will create a world class regulatory system where good practice is the norm for all OISC regulated advisers

Priority area	Outcome	Outputs / measures	Objectives
Regulation	Those with the right skills and knowledge are able to provide immigration advice as an OISC registered adviser	<p>100% of approved applications have met all of the quality assurance standards.</p> <p>80% of all completed Level 1 applications for individual adviser and organisation applications completed within 4 months.</p> <p>90% of all completed applications for individual adviser and organisation applications completed within 6 months.</p> <p>95% of all completed 'straightforward' continued registration applications completed within 15 working days.</p> <p>95% of all continued registration applications are decided within 3 months.</p> <p>95% of all continued registration applications are decided within 5 months.</p> <p>Applicant surveys indicate process as efficient.</p>	<p>Assess all applications for fitness and competence and approve those that meet the OISC quality assurance standards.</p> <p>Process applications for registration and continued registration in a timely and efficient manner.</p>

Objective 3: Regulate

We will create a world class regulatory system where good practice is the norm for all OISC regulated advisers

Priority area	Outcome	Outputs / measures	Objectives
	Advice seekers know if an immigration adviser is registered with the OISC	<p>100% of quarterly quality assurance checks confirm that levels and categories and adviser details are correct on Themis.</p> <p>100% of CAB and Advice NI organisations are updated following their annual review.</p>	Ensure data on the OISC Register and Adviser Finder is accurate and up to date.
Compliance	Advice seekers receive good quality advice and service from their OISC registered immigration adviser	<p>Two thematic audits and a self-assessment audit will be piloted with regulated organisations.</p> <p>Results of thematic audits will be collated to provide an indication of compliance by regulated organisations in areas reviewed.</p>	<p>Ensure regulated organisations maintain a high level of compliance with the Commissioner's Code of Standards.</p> <p>Pilot and assess effectiveness of thematic audits and self-assessment as a means of assessing compliance with the Codes by regulated organisations.</p>
	Unfit or incompetent OISC advisers are identified and either improve or are deregistered	<p>Report on risk levels and movement and cases of concern meeting (Quarterly)</p> <p>100% high-risk organisations are scheduled for audit within the business year or 12 months of the risk being identified.</p>	<p>Identify organisations that are at risk of being non-compliant with the Codes of Standards through risk assessment processes.</p> <p>Audit OISC registered organisations who are most at risk of non-compliance and ensure timely feedback.</p>

Objective 3: Regulate

We will create a world class regulatory system where good practice is the norm for all OISC regulated advisers

Priority area	Outcome	Outputs / measures	Objectives
		<p>100% of complaint determinations and audits reports meet quality assurance standards.</p> <p>85% of Identified Issues Reports are dispatched within 10 working days of an audit.</p> <p>90% are dispatched within 20 working days.</p> <p>100% of decisions to cancel or refuse registration are issued within 20 working days of the conclusion on fitness or competence being made.</p>	<p>Ensure recommendations identified through either an OISC audit or a complaint are implemented within the time period agreed.</p> <p>Remove organisations that have acted in an entirely unfit or incompetent manner or which continue to fail to improve following an audit or a complaint from the OISC register.</p>
Support	OISC advisers understand and are prepared for changes in OISC's operating model	Report on engagement through consultation and attendance at events/workshops.	Ensure OISC regulated organisations and advisers are aware of and consulted on the OISC's future regulatory model and understand its implications for changes to previous ways of working.

Objective 4: Protect

We will protect advice seekers, taking action against poor advice, exploitation and criminal activities

Priority area	Outcome	Outputs / Measures	Objectives
Complaints	Advice seekers and advisers are satisfied that complaints against regulated advisers are resolved in a timely, fair and proportionate manner and action is taken where appropriate	<p>Feedback from complainant surveys on complaints process indicates that complaints are considered in a timely, fair and proportionate manner.</p> <p>85% of complaints are resolved or determined within five months of the complaint being received.</p> <p>100% of complaint determinations reviewed through quarterly quality assurance checks indicate that the investigation conducted was appropriate and outcomes reasonable.</p>	<p>Investigate and respond to complaints against advisers in a timely manner.</p> <p>Investigate complaints in a proportionate way that ensures findings are justified and fair to both parties.</p> <p>Keep complainants informed throughout complaints process and ensure they are aware of decisions and resulting actions.</p>
Investigations	Illegal immigration advice is disrupted or stopped by appropriate enforcement action including prosecution	<p>100% of organisations/individuals under investigation and where the evidential tests as set out in the Criminal Enforcement Policy are met are published.</p> <p>85% of prosecutions are successful.</p> <p>Monthly report on all enforcement action taken.</p>	<p>Increase awareness amongst advice seekers of organisations under investigation.</p> <p>Bring perpetrators to justice where a case meets evidence and public interest test.</p> <p>Increase range and use of options for enforcement activity.</p>

	<p>Advice seekers receive redress or compensation from the relevant adviser for bad practice or illegal activity</p>	<p>20% of cases fees are repaid on behalf of the complainant.</p>	<p>Recover fees charged for immigration advice/services provided by unregulated advisers.</p>
	<p>Enforcement agencies and OISC share good quality intel relating to illegal immigration activity</p>	<p>Increase in number of referrals leading to investigation or being forwarded to another agency (2020/21 baseline).</p>	<p>Identify and establish relationships with key partner agencies.</p> <p>Receive and refer intel from/to partner agencies and other sources that leads to investigation or being forward to another agency.</p>

Objective 5: Enable

We will provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value

Priority area	Outcome	Outputs / Measures	Objectives
People	Business plan outcomes are achieved through an effective performance management system	<p>100% of employees have Key Work Objectives agreed.</p> <p>100% of employees complete their half year performance appraisal.</p> <p>100% of employees complete their full year performance appraisal.</p> <p>100% of line managers submit full team interim appraisals.</p> <p>100% of line managers submit full team end of year appraisals.</p>	<p>All employees complete all stages of the performance appraisal process as set out in the OISC Performance Appraisal Policy and Procedure.</p> <p>Line managers submit all interim and end of year appraisals within the timescales set by HR and the Performance Appraisal Policy and Procedure.</p>
	Remote working is supported through electronic HR processes and procedures.	100% of process are electronic.	Move all paper-based processes to electronic and ensure staff are aware and trained where required.
	Staff have good levels of job satisfaction and feel supported in their roles	<p>Response rate staff survey (civil service) and benchmarked against ALBs of a similar size (pulse survey) our aim is to achieve comparative results to similar ALBs.</p> <p>Improvement in OISC wellbeing survey results.</p>	<p>Increase employee understanding of the OISC's vision, values, and objective and how their work contributes to it.</p> <p>Prioritise learning and development which supports staff to manage change and remote working.</p>

Objective 5: Enable

We will provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value

Priority area	Outcome	Outputs / Measures	Objectives
			<p>Ensure employees have the right level of engagement and interaction with the OISC, their line manager and their teams.</p> <p>Encourage and support staff to participate in OISConnect.</p>
Business management – finance	OISC manages its budget within allocated monies	Budgets remain within allocated funds with any exceptions agreed with finance and Commissioner (monthly report).	Ensure effective budget management and controls are strictly adhered to within allocated funds.
	No fraudulent activities occur within the OISC	Number of activities identified and responded to.	Counter anti-fraud activities are identified and maintained across all OISC departments
	OISC accounts meet the requirements of the auditors and sponsor department	<p>NAO audit results of year end accounts.</p> <p>Financial resources are spent (receipts and expenditures) and are compliant with Managing Public Money as set out in HM Treasury 2021 MPM guidance.</p>	Achieve unqualified accounts with no management override with financial statements which are accurate with no material misstatements.
Business management – IT and data	Staff's ability to work is unaffected by unplanned IT system and hardware downtime	<p>99% uptime for IT system and hardware uptime</p> <p>90% of IT issues are resolved in accordance with Service Level Agreements.</p>	<p>Ensure employees have access to IT systems 99% of the time (excluding planned downtime).</p> <p>Resolve reported IT issues in a satisfactory and timely manner in line with high, medium and low priority timescales.</p>

Objective 5: Enable

We will provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value

Priority area	Outcome	Outputs / Measures	Objectives
	OISC data and information is secure from external and internal threats	Report where breaches or incidents have occurred. Responses to be within legal timescales and in accordance with relevant data protection legislation. 0 notifiable incidents reported Report on number of low-level incidents	Minimise breaches and data incidents occurrences and their impact. Have zero incidents occur that require notification to be made to the information Commissioners Office. Encourage reporting of incidents from OISC staff through a culture of information security and data awareness.
	OISC to strengthen its Cyber security	Deliver User Awareness Training Report on number of cyber security breaches	Minimise cyber security breaches and their impact
Business management – Legal	OISC decisions to remove registered advisers that are deemed unfit are upheld at tribunal	85% of decisions are upheld at Tribunals 90% of prosecutions lead to a conviction	Successfully defend OISC decisions at Tribunals. Ensure that decisions are proportionate and legally robust.
	Those taken to court for providing immigration advice illegally are convicted	Number of convictions – 85% of prosecutions are successful.	Successfully prosecute advisers that the OISC has taken to court.

Objective 5: Enable

We will provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value

Priority area	Outcome	Outputs / Measures	Objectives
Strategy, business planning and risk	OISC priorities and decisions are aligned with the OISC's vision, mission and objectives	Stakeholder feedback Monthly reports to OISC Commissioner Audit and Risk Assurance Committee Quarterly review meetings Annual report	Update the OISC Corporate Plan so that it best reflects the OISC's vision and ambitions. Monitor progress against 2021/22 Business Plan outcomes and objectives. Develop and promote business area objectives with senior managers for 2022/23 and measure progress towards achieving them.
	OISC knows how it is progressing against achieving its vision and strategic objectives	Monthly reports to OISC Commissioner Audit and Risk Assurance Committee Quarterly review meetings Annual report	Agree evidence requirements and identify how these will be sourced. Establish baseline data and evidence for measures of success as set out in the OISC's Corporate Plan.
	OISC has confidence in its decisions, processes and procedures	Monthly reports to OISC Commissioner Quarterly review meetings Annual report	Identify and manage corporate and operational risks in line with the OISC's risk management process. Complete all internal audit recommendations within the timescales agreed with the auditors.

Objective 5: Enable

We will provide high-quality, efficient and cost-effective services where resources are managed dynamically to maximise value

Priority area	Outcome	Outputs / Measures	Objectives
Business management – communications	Staff have greater awareness of OISC activity and feel more connected to the organisation	Improvement in internal communications survey results.	Deliver internal communications plan.

6. Our development programme

Alongside our Business Plan activities, we will also continue to develop and deliver our Development Programme. The Development Programme will ensure the OISC is able to deliver its vision and Corporate Plan. It will reform the OISC into a modern and engaging organisation, geared to meet the needs of advice seekers in the 2020s.

In 2021/22 our Development Programme priorities are:

Outcome	Outputs / Measures	Objectives
OISC Commissioner has confidence progress against the aims and objectives of the Development Programme in line with the Programme Initiation Document	Approval by Development Programme Board	Ensure Development Programme decisions and activities are aligned with the OISC vision and Development Programme objectives (activity – setting up formal programme structure and documentation)
	Report to Development Programme Board	Progress delivery of high level programme plan objectives for 2021/22

7. Our resources

People

We employ 60 colleagues across the OISC. Our business plan activities include a number that focus on developing and investing in our staff, to ensure we have the right leadership, skills and values to deliver our 2021/22 Business Plan.

Finance

Our budget to deliver the Business Plan activities and transformation aims for 2021/22 is £3,820,000.

