

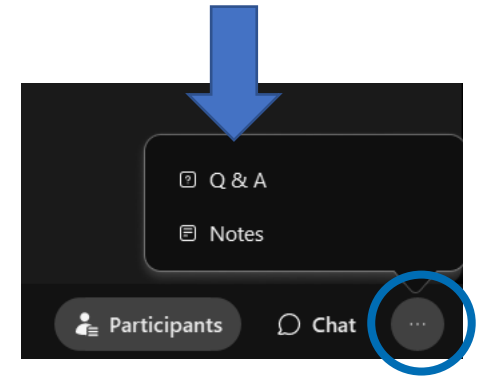


# Transforming the OISC Conference

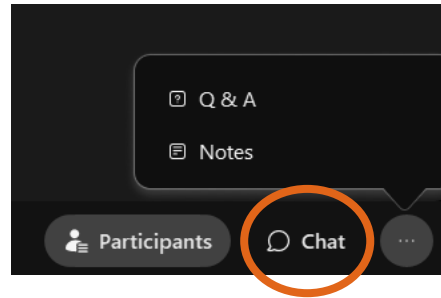
Tuesday 9 November 2021

# Format

- Questions
  - Q&A session at the end of the conference (12.30 – 1pm)
  - Q&A focus on OISC not home office presentations
  - Submit questions throughout the conference using the Q&A box



- Technical issues – ask Andy on chat



- Recording
  - Conference - recorded and shared with attendees after event

- Feedback - important we hear from you
  - What you liked about the event
  - What we could do better

Welcome  
and  
introductions

John Tuckett  
Immigration Services  
Commissioner

# OISC conference with Immigration Advisers

## Two firsts:

- First ever on-line conference
- First time OISC has ever brought together so many immigration advisers in a single forum

## Theme:

- How OISC is looking to change the way we work
  - with advisers
  - with those seeking advice
  - all others in the immigration services sector

Today is an opportunity to start a conversation which changes how we engage with each other and work together.

# Your Commissioner

## John Tuckett

- Joined as Commissioner in July 2019
- Last role was as CEO of the Marine Management Organisation regulating all activities in seas around England – including licensing French fishing vessels!
- Background
  - 17 years in the Royal Navy
  - Chief Executive roles in the NHS, MoD and Defra Arms Lengths Bodies
  - Led multiple organisational change programmes

## Three passions you might not know about!

- One
- Two
- Three

# Two Tributes

## Dr Ian Leigh

- Deputy Commissioner for many years
- Retired in February 2020
- Role of Deputy Commissioner

## Work of advisers and OISC staff during Covid19

- March 2020 – life changed for everyone
- Working from home
- Life has gone on
- Advisors have continued to give advice
- OISC has continued to regulate
- Innovative on line solutions developed:
- Competence assessments
- Audits
- Remote PACE interviews
- Thanks to you all

# Speakers

- Thomas Pursglove MP:
  - Minister for Justice and Tackling Illegal Migration (video)
- Oliver Carlisle
  - Deputy Director, Human Rights and Family Unit, Asylum, Protection and Enforcement Directorate
  - Migration and Borders Group
- John Tuckett
  - Immigration Services Commissioner
- Deirdre Gilchrist
  - OISC Head of Regulation

# Setting the context



Minister

# **Minister Thomas Pursglove MP**

Minister for Justice and Tackling Illegal Migration

Home Office

## **Oliver Carlisle**

Deputy Director, Human Rights  
and Family Unit, Asylum,  
Protection and Enforcement  
Directorate

Migration and Borders Group

**Break**

Transforming  
the OISC

**John Tuckett**  
**Immigration Services**  
**Commissioner**

# Transforming the OISC - Introduction

- Clear message from Ministers and officials on appointment
- Share the journey that has led us to where we are today
- Talk will be in four parts:
  - **Why** are we undertaking a transformation of the OISC
  - **What** we are now aiming to achieve
  - **How** we will deliver in new ways
  - **Benefits** for advice seekers, advisers, the public, the wider immigration system and OISC Staff

# Why transform the OISC - Overall environment

- Major changes across the entire Immigration system (Points Based System, Windrush, Brexit, new Bills etc etc) - good quality advice never more important
- Major changes in numbers seeking advice
  - Brexit and EU citizens
  - Hong Kong and Afghanistan
- Major changes in where those seeking advice are located
  - Geographical distribution of advisers may not be optimal
  - ?Advice deserts
- Continued and ??increasing levels of illegal activities by unregistered individuals
  - Poor advice of little or no benefit to the advice seeker
  - Victimisation and abuse
- Overall a very different and more challenging environment to regulate

# Why transform the OISC - Within OISC

## My observations:

- OISC overall doing what it was set up to do

## And also that:

- London centric – little awareness of immigration issues in other key metropolitan areas
- Reacting to issues arising from applications or complaints – not seeking issues out proactively
- Operating independently with limited engagement with stakeholders
- Low public profile through social media or communications
- No focus on advice seekers as the ultimate beneficiary of advice, or their needs.
- Prescriptive, old fashioned paper based processes

# Why transform the OISC - Commissioner's charge

## HIGH QUALITY IMMIGRATION SERVICES ACROSS THE UNITED KINGDOM

- Knowing the customer - who is accessing immigration services; what their needs are and how these can be met
- Matching SUPPLY and DEMAND for services/advice - right people in the right places??
- Defining “high quality” - having systems with a minimum of bureaucracy and a partnership approach that is the hallmark of modern regulation
- Knowing scale of illegal activities across the UK and addressing these proactively
- Having a public profile with readily available information so people know how to access good quality advice when needed



# Why transform the OISC

Key question in 2019/20 for an incoming Commissioner:

- Is OISC able to meet the immigration services challenges of the 2020s and deliver its overall remit?

Conclusions in late 2019 were:

- OISC was doing what it was established to do 20 years ago
- To be fit for the challenges of the 2020s, significant change needed to address:
  - Overall vision with a new focus on the seeker of advice
  - Redefinition of OISC role and purpose, values and priorities
  - Modernising its culture and processes to work flexibly and in partnership with people.
  - Updating its infrastructure through digitalisation and reduce bureaucracy

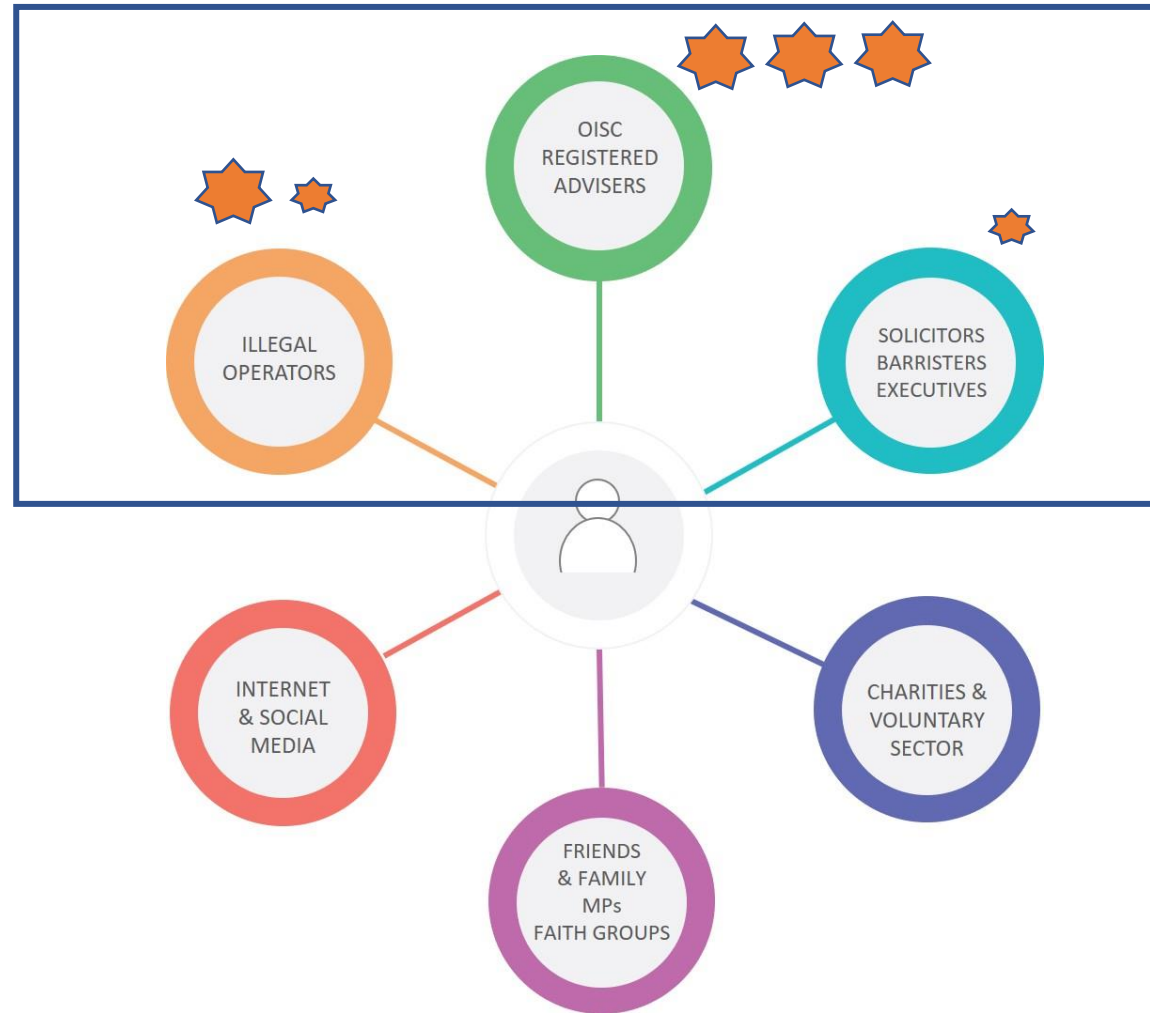
# Putting the advice seeker at the centre

- See the seeker of advice as the beneficiary of immigration services
- Put them at the heart of the system
- Ask who provides them with advice?



# Putting the seeker of advice at the centre

- Which areas has OISC traditionally focussed on?

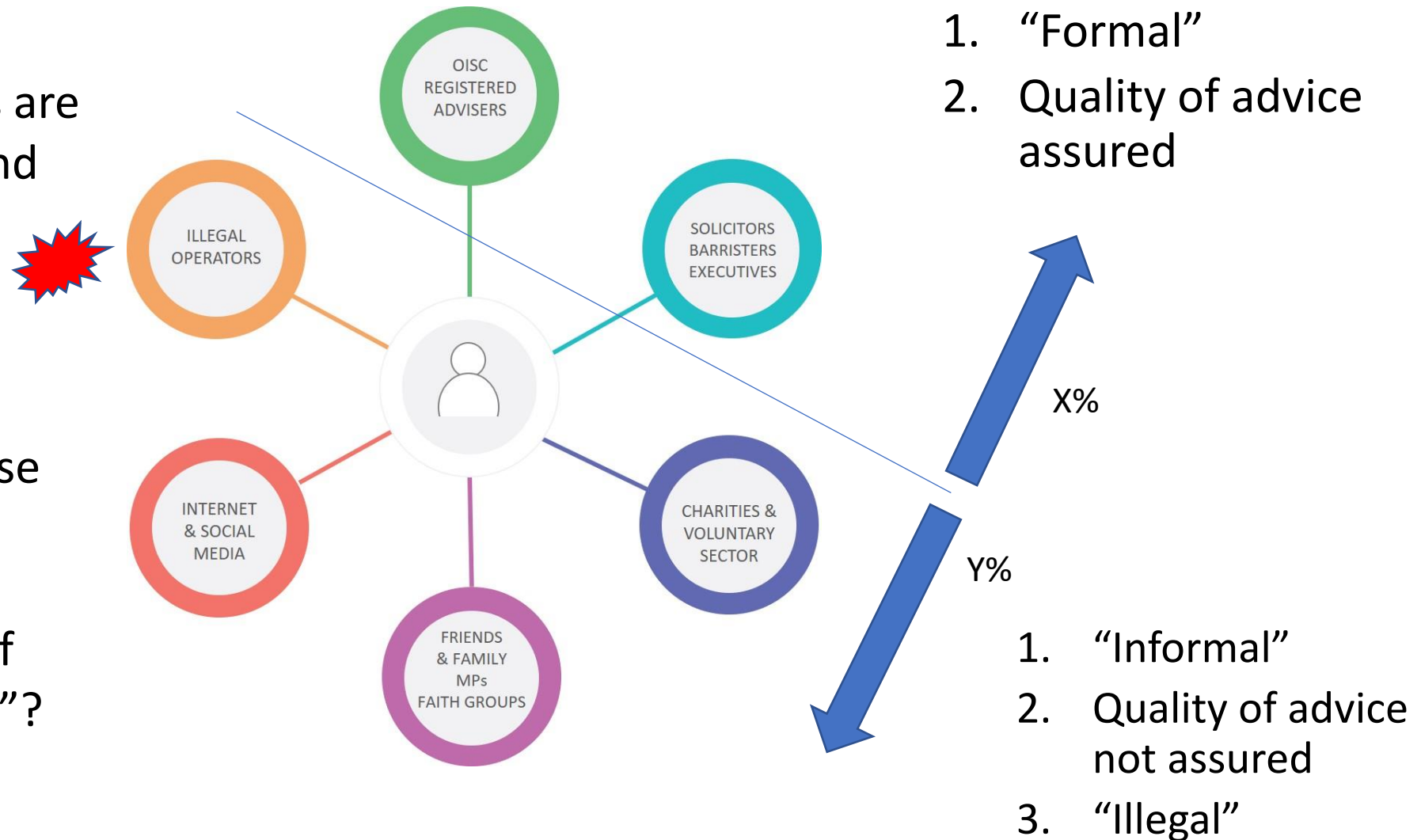


OISC focus to date

# Putting the advice seeker at the centre

## Key questions:

- What % of applications are supported by formal and informal sources of advice?
- How coherent or coordinated are all these sources of advice?
- How does the seeker of advice see the “system”?



# Putting the advice seeker at the centre

- OISC **only** national organisation charged with ensuring high quality immigration services in UK
- OISC **must** expand its range of activities to influence all potential areas of advice to ensure quality and consistency.



# Deriving a new vision

- Focus: The **advice seeker** who needs immigration **advice**

## Advice seeker...

Seeks advice **only** from registered/regulated advisers

Knows how to **access** these services and advice

Aware of the risks of unregulated advice

## The advice...

is always **reliable**

delivered with good **professional** practice

breeds **the confidence** to act upon it

# | The vision of OISC in the 2020s :

Every person seeking immigration advice within the UK:

- Makes an informed choice to seek advice only from a regulated immigration adviser
- Receives reliable, professional advice and services in which they have confidence and trust

# OISC Mission

**To connect those needing immigration advice with reliable advice**

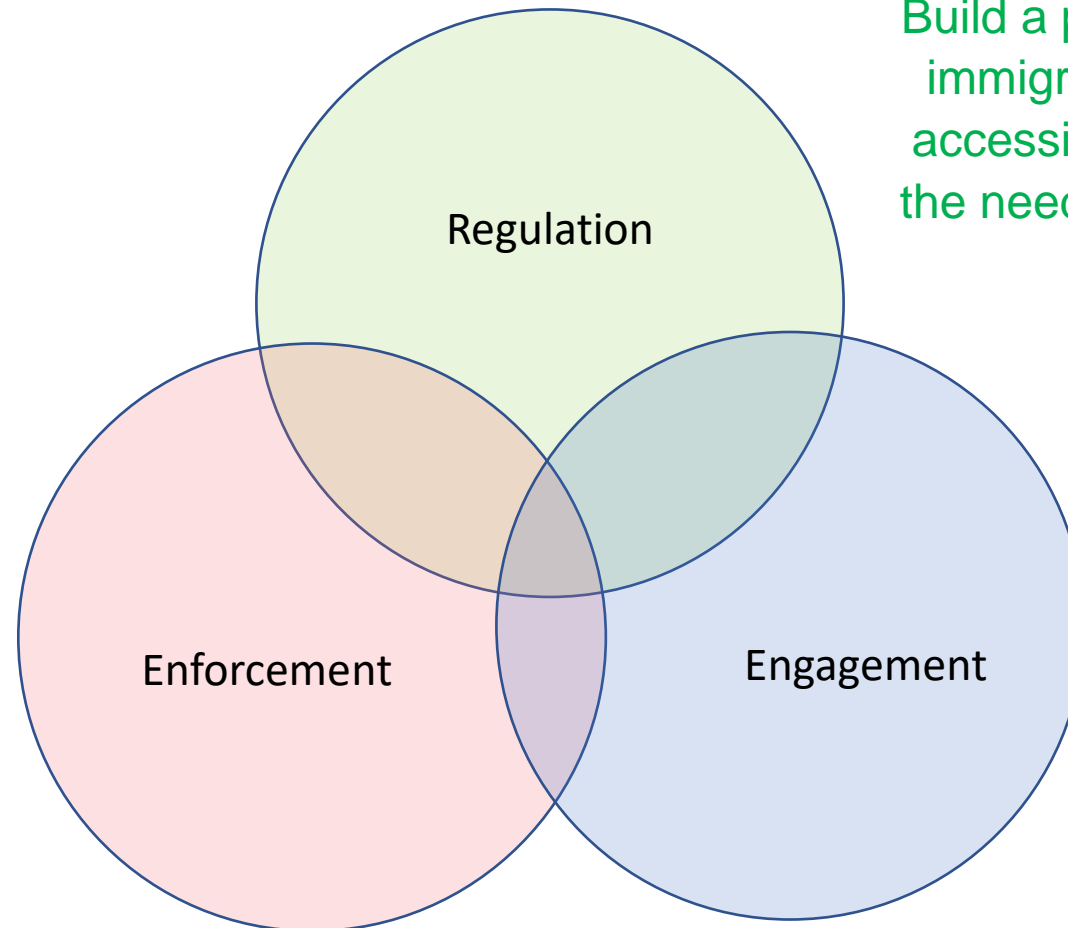
OISC role: **enabling regulator:**

- Enabling:
  - Works with all within Immigration Services to bring about better results
- Regulator:
  - Work with advisers to meet defined standards
  - Disrupt illegal activities that provide unreliable advice
  - Engage to understand the needs of advice seekers and raise awareness about how to access reliable advice



# How a transformed OISC will deliver the vision?

## Focus on three areas



Build a professional and respected immigration advice sector that is accessible and trusted and meets the needs of those seeking advice.

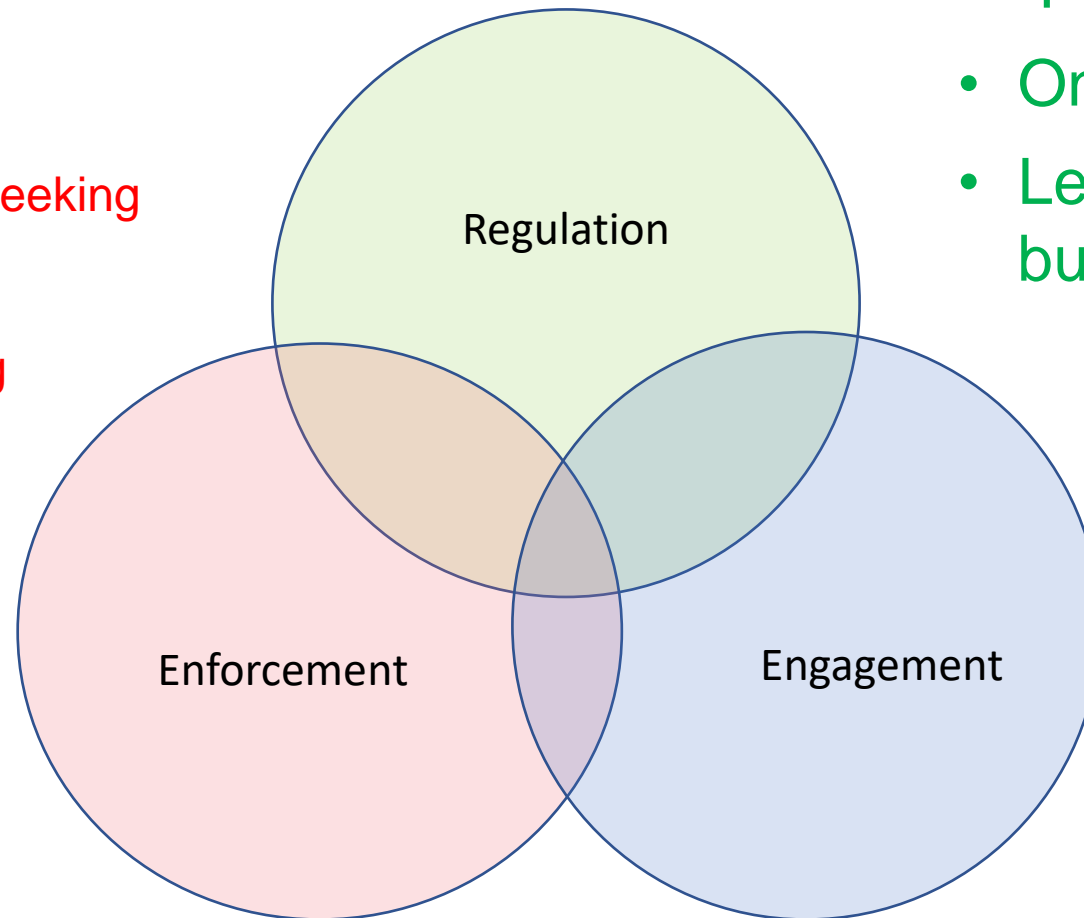
Advice seekers are protected from exploitation and illegal unregulated advice by proactively seeking out and disrupting such activities.

Raise awareness and increase numbers of advice seekers using a regulated adviser, and especially those registered with OISC

# How a transformed OISC will deliver the vision?

## What's different?

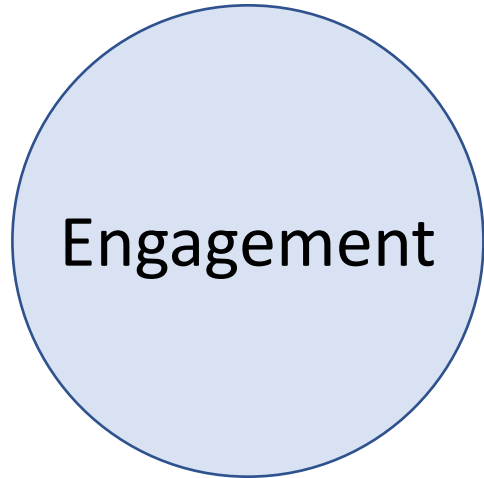
- Proactive approach to seeking out illegal activities
- Disruption aim
- Range of tools including targeted prosecutions



- “Principle based regulation”
- On line and digital processes
- Less prescription and bureaucracy

- Completely new agenda
- Engagement with advice seekers, local organisations and advisers

# Delivering– Engagement



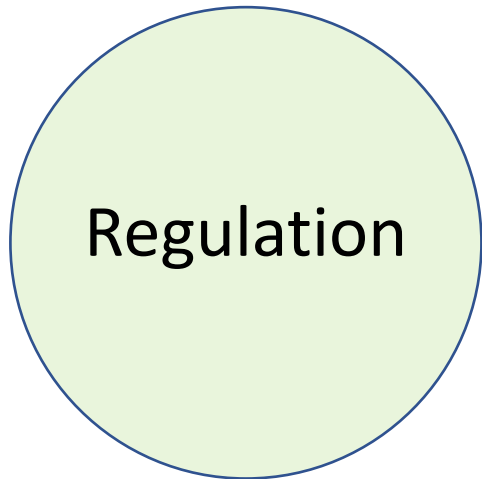
## **PROMOTE**

- Raising awareness locally and nationally of the work of advisers and OISC, and how services can be accessed
- Raise awareness of the risks and dangers of unregulated advice

## **COLLABORATE**

- Reach out to advice seekers, advisers and representative bodies to understand the needs of advice seekers and how these can be addressed by OISC
- Work with national and regional bodies concerned with immigration to create better ways and processes that meet those needs

# Delivering– Regulation



## **REGISTRATION**

- Processes to be streamlined and digitised
- More emphasis on applicants being “registration ready”
- On line processes (assessments) to continue

## **COMPLIANCE**

- Model of “Principle-based regulation” to maintain professional standards with less prescription
- More working with advisers locally to support and raise standards
- Move towards self regulation where appropriate
- Audits on line to continue with thematic audits

# Delivering – Enforcement



Enforcement

## **PREVENT & PROTECT**

- Proactively seek out illegal activities especially outside of London
- Continue to respond to complaints
- Disrupt and stop the illegal activities through range of measures that include education, sanctions, name and shame.
- Prosecutions still a major tool and will be targeted for maximum impact

# Drivers for how the OISC will deliver

1. **Need for “Boots on the ground”** - a local presence to understand local issues and needs
2. **London centric approach of past now questionable** given:
  1. Scale of immigration in other metropolitan areas
  2. Increase in number of advice seekers from new origins, e.g. EU
3. **Pandemic** has shown
  1. Working based from Home viable way of OISC delivering
4. **Head Office lease expires Nov 22**
  - Government agendas:
    - to move organisations out of London
    - “Levelling up” - more public servants regionally-based
  - Any new office outside London costly and loss of staff

# How the OISC will deliver

## In 2022 OISC will move to a new model of working:

- **3 Regional Teams with National teams providing UK wide support**
- **All staff will be based at home - No head office or regional offices**
- **All ICT systems become cloud based and processes progressively digitised**

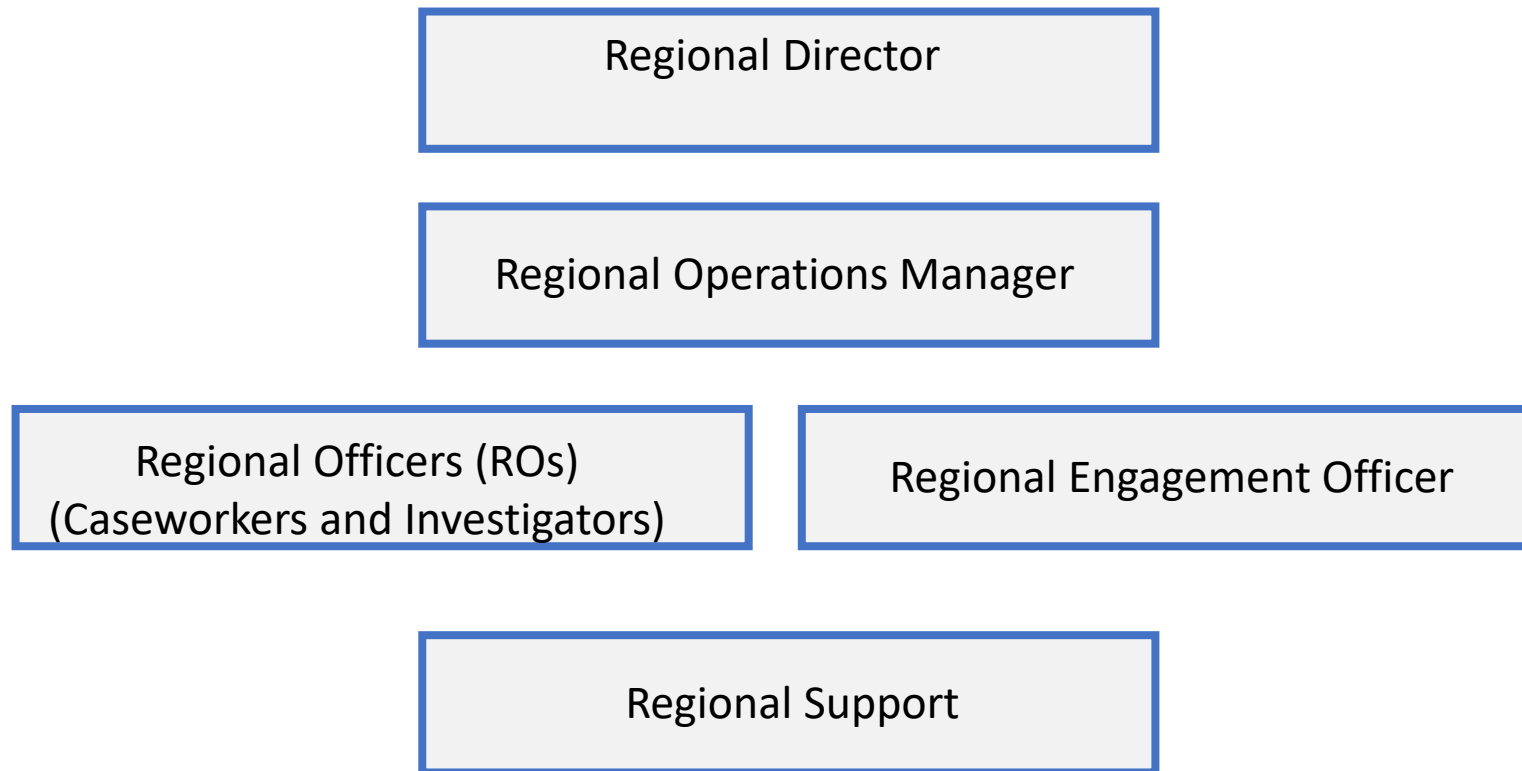
## The Regional Teams:

- All Regulation, Enforcement and Engagement operational activities
- Free to adopt priorities and approaches that meet their regions' needs.
- National frameworks for Regulation, Enforcement and Engagement will set the overall OISC approach

## National Teams:

- Registration and re-registration (Authorisations Team)
- Intelligence
- Legal Services and Corporate Services (HR Finance ICT and Data Management)
- Communications, Business and Performance Planning and Customer Services Unit

# How OISC will deliver– Regional Teams



- Initially 4 ROs in North and Central teams, 8 in South
- Grow RO numbers in 23/24 eventually to teams of at least 10
- Staff will live in their region to grow local presence. Not possible at outset
- Any new staff will be recruited from the region
- No regional office as such.



# How the OISC will deliver

## North

- Scotland, Northern Ireland
- North East & North West England
- Yorkshire and Humberside

Kate Hargreaves (Engagement)

Adam Harrison

## Central

- Wales
- West Midlands, East Midlands, East of England
- Avon Hertfordshire, Buckinghamshire
- Oxfordshire, Gloucestershire

Victoria Bovill-Lamb (Enforcement)

Claire Kennel

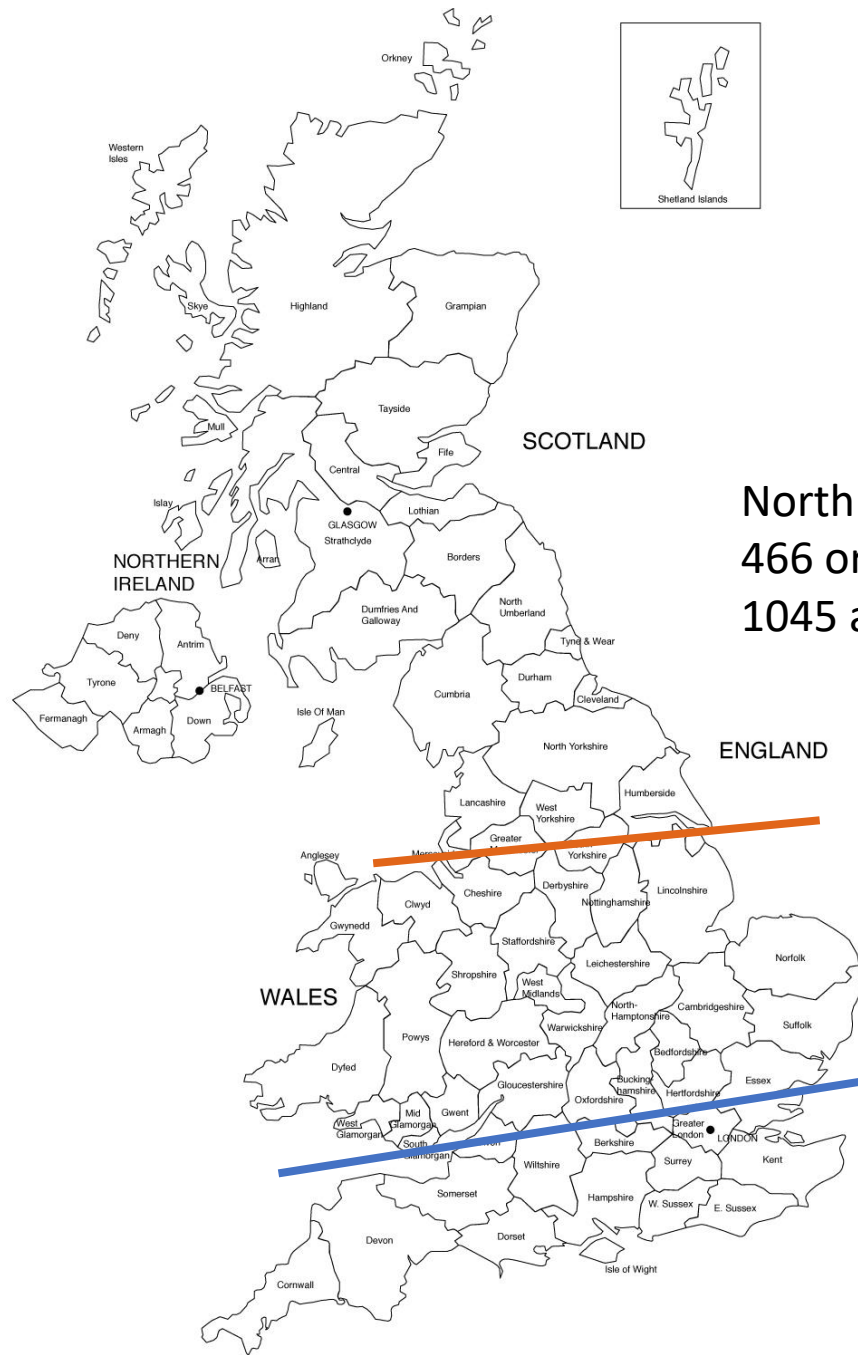
## South

- London
- Counties south of the central belt (as set out above)

Deirdre Gilchrist (Regulation)

Jon Gough

# New regions



**North Region**  
466 organisations  
1045 advisers

**Central Region**  
425 organisations  
760 advisers

**South Region**  
973 organisations  
2245 advisers

# Transforming the OISC – Implications for advisers

Step change in how we work with advisers.

- Support
  - Advisers will have the support of the whole regional team
  - No longer a dedicated caseworker for each adviser as such
  - More contact, better tailored support
- Principle based regulation will mean
  - Less bureaucracy and less prescription
- National Teams will provide
  - New customer service unit – deal with all enquiries in one place
  - Improved website and supporting materials easier to understand

# What are the benefits of a transformed OISC?

- **Advice seekers:**

- OISC activities tailored to meet their needs where appropriate
- Better informed about how to access high quality advice.
- Better quality applications with greater chance of success and less need for appeals etc
- Better protected from illegal activities reducing chances of victimisation and abuse

- **Advisers:**

- Better supported by Regional Teams to develop and grow
- Less prescription and more partnership working with OISC staff to ensure high standards and supply of advice matches demand
- Less bureaucracy and more streamlined services

# What are the benefits of a transformed OISC?

## Public:

- Raised awareness about immigration advice services will benefit all those seeking advice, their families and employers
- Raised awareness of the risks of illegal activities will reduce chances of victimisation and abuse

## Immigration system overall

- High quality advice leads to better quality applications, with less chances of rejections, challenges and appeals, enabling a greater focus on valid applications
- Proactively tackling illegal practice protects the integrity of the UK Immigration system

## OISC Staff

- Real chance to put the advice seeker at the heart of their work
- More varied jobs moving away from silos of the past. Greater career opportunities
- Flexibility that working from home can bring

# Final words

- OISC is on a journey of development, change and transformation
- Clear sense of purpose and direction
- Journey will be challenging and it will take some years to fully achieve the vision
- Benefits are considerable and justify the effort it will take
- Much still to be worked out - Your contribution will be all important for long term success
- Hope you will join us on this journey as together we can be much stronger, more effective and better serve those who depend upon us
- Thank you for all you have done in the past, what you are doing now and what I hope you will do in the future

**Break and submit  
your question**

**Working for You**



# Introducing the regions

- **Deirdre Gilchrist, Regional Director (South) & Head of Regulation**
- **Victoria Bovill-Lamb, Regional Director (Central) & Head of Enforcement**
- **Kate Hargreaves, Regional Director (North) & Head of Engagement**

OISC future  
regulation

**Deirdre Gilchrist**  
**Head of Regulation**

# What does regulation currently look like?

## Applications

- 150 Applications from new organisations seeking registration per year
- 460 Applications from new advisers to join existing organisations per year
- 100 Applications from organisations seeking to raise levels each year
- 1200 Continued registration applications each year

3951 Authorised advisers in  
1782 Regulated organisations

- Complex entity based regulatory system - complex application process
- Testing as part of the application process
- Varying degrees of 'registration ready'

# What does regulation currently look like?

## Compliance

- Code of Standards - 85 Codes
- Guidance on Competence & Guidance on Fitness
- Assessed through premise and thematic audits

Regulated organisations are supported by allocated OISC caseworkers (case owners)

- Codes are highly prescriptive
- System of Levels and Categories set out in the Guidance on Competence
- Case owners hold approximately 150 cases each

# What does regulation currently look like?

## Complaints

- Approximately 100 complaints made against regulated advisers each year
- Complaints Scheme - formal investigation of complaints against regulated organisations
- Complaints re-direction scheme

Majority of complaints are investigated through the formal complaints scheme within 5 months of receipt

- Complaint numbers are low
- Outcomes for the client are limited
- Most cases determined through the formal complaints process

# Future of regulation



Increasing focus

Consumer  
needs

Prescriptive  
& OISC led  
regulation

Decreasing focus



# Regulatory vision

We will create a strong confident network of professional regulated advisers, who have high standards of competence and client care.

They will be the number one choice for those seeking immigration advice and services within the UK and be trusted by partners.

They will be encouraged by the OISC to innovate and meet local supply needs, while requiring little day to day support.

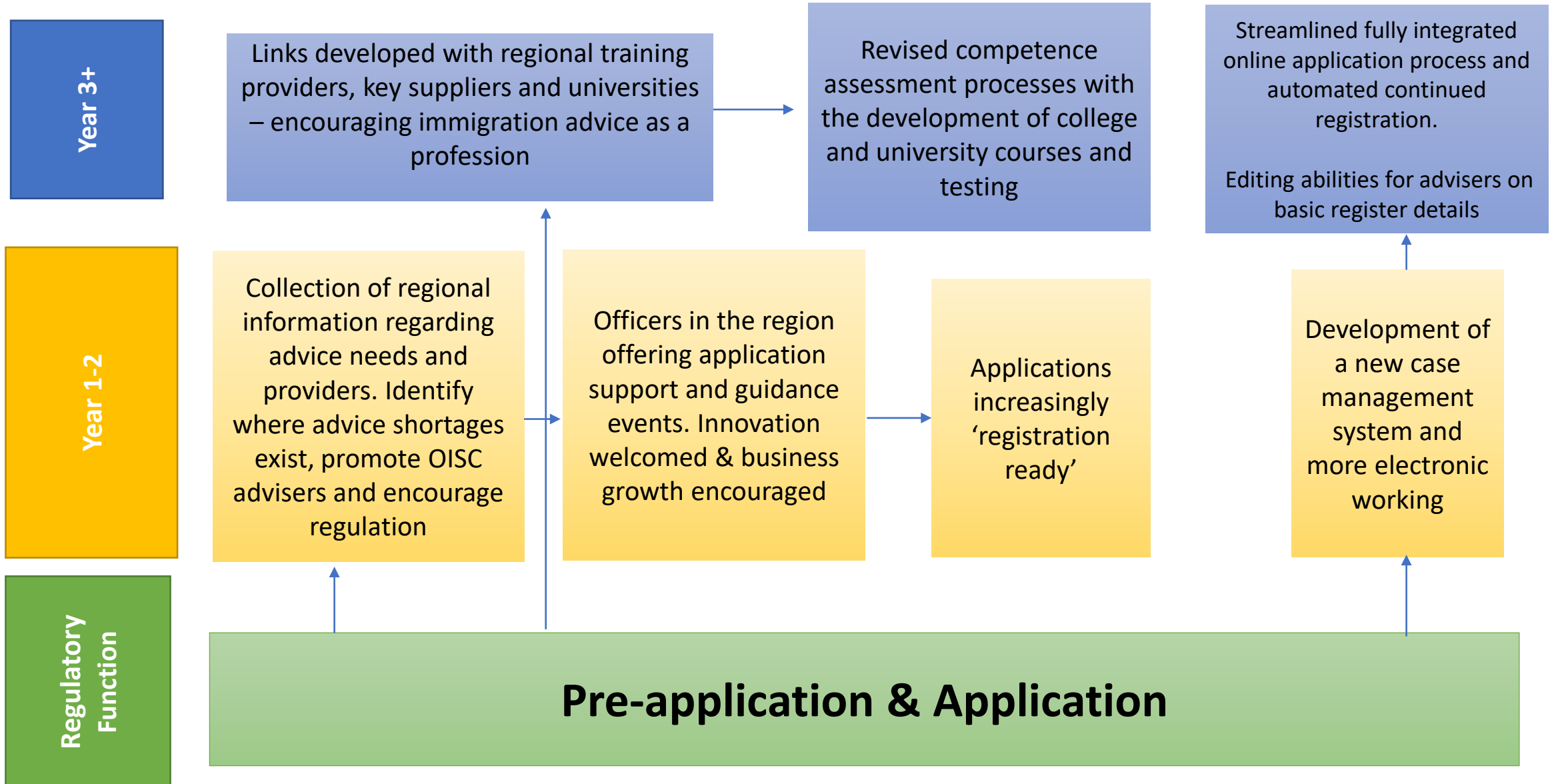
The OISC will promote their regulated advisers and take swift action against those who bring the profession into disrepute.

# Regulation Future Outcomes

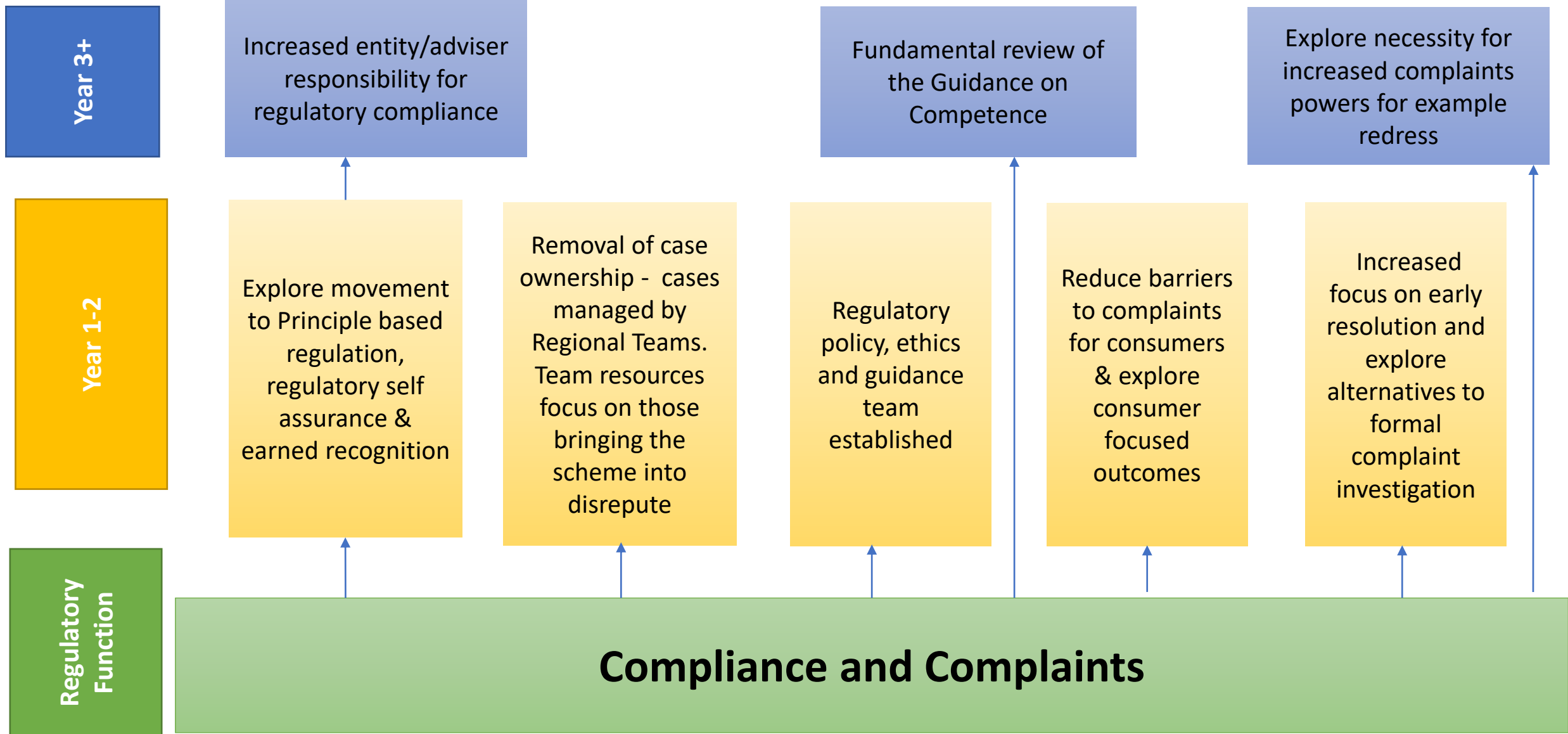
1. Applicant organisations and their advisers will be 'registration ready' at the time of their application
2. Advice seekers will be able to access a trusted immigration adviser who can provide quality advice to meet their individual needs
3. Advice seekers and the sector will recognise OISC advisers as professionals delivering valued specialised immigration advice and services
4. Registered organisations will take responsibility for demonstrating their compliance with set standards including regulated self-assurance and earned recognition
5. Advice seekers will have access to an effective complaints and dispute resolution system



# The plan



# The plan



# Benefits

## Benefits - Advice Seeker

Increased ability to find an adviser who is right for them

Trust in their adviser - recognised within the sector as the expert

Assurance that if something goes wrong it will be effectively dealt with

## Benefits - Regulated Adviser

Faster and clearer application processes. Advisers who are 'registration ready'

Flexibility in how standards can be met - innovation and reward

More collaboration on complaints resolution to gain good outcomes for all

**Break and submit  
your question**

# Q&A Session

**John Tuckett**

**Deirdre Gilchrist**

**Victoria Bovill-Lamb**

**Kate Hargreaves**