Complexity Application Routing Solution – Study (CARS(S))

Version 2.0

Published for Home Office staff on 25 April 2025

Contents

About this guidance

This guidance sets out the arrangements which Visa, Status and Information Services (VSI) Study operations must follow from **14 August 2023**, when routing and processing applications from customers applying for a Student entry clearance under Appendix Student (excluding Appendix Child Student).

Complexity Application Routing Solution - Study (CARS(S)) must be used in all operations where Student visas are considered, to determine the likely complexity of the application.

There are 2 possible outcomes of the routing:

- Single person centric attribute (PCA) non-complex direct routing (NCXDR)
- Single PCA complex direct routing (CXDR)

All applications routed through CARS(S) can be assessed by EO decision makers (EODMs). AO decision makers (AODMs) can only assess non-complex (NCX) applications and complex (CX) applications where the Confirmation of Acceptance of Studies (CAS) has been withdrawn.

In this guidance single PCA NCX applications are referred to as NCX, and single PCA complex applications are referred to as CX.

Reference to caseworkers can be an AODM or EODM, reference to a senior caseworker can be an EODM for AODM referrals, Entry Clearance Manager (ECM) or Operations Manager.

Contacts

If you have any questions about the guidance and your line manager or senior caseworker cannot help you or you think that the guidance has factual errors, then email the VSI Central Services Team (CST).

If you notice any formatting errors in this guidance (broken links, spelling mistakes and so on) or have any comments about the layout or navigability of the guidance then you can email the Guidance Review, Atlas and Forms team.

Publication

Below is information on when this version of the guidance was published:

- version **2.0**
- published for Home Office staff on **25 April 2025**

Changes from last version of this guidance

Formatting updates to bring it in line with the correct standards.

Related content
[Contents](#)

Approach to routing

This guidance is to be used by VSI Study operations. It covers arrangements for dealing with applications made under Appendix Student (the Student route, but excluding Appendix Child Student) of the Immigration Rules.

This guidance outlines the way that Study operations are required to route and allocate applications for processing. CARS(S) is a fully automated routing solution, insofar as it does not include any attribute questions which require a manual response, as all attribute outcomes can be automated by reading data from the application form and certificate of acceptance for studies (CAS).

It is a basic algorithm which routes applications by identifying those where a particular criterion (or data match) is met, and therefore defined as complex indicator(s). The system differentiates complex (CX) applications from non-complex (NCX) applications so that the application can be allocated to an appropriate grade of decision maker an administrative officer decision maker (AODM) or an executive officer decision maker (EODM); or for directive enrichment where the application matches a risk profile. This facilitates an efficient and effective decision making process, but it does not remove the need for individual caseworkers to consider all the relevant information for an application against the Immigration Rules.

Caseworkers at all grades must continue to assess each application on its individual merits against the rules and:

- Student guidance (internal version)
- Student guidance (external version)

and make decisions based on the information provided by the applicant, supporting documents and any other factors relevant to the application at the date of application or date of decision, as appropriate.

Caseworkers at all grades must consider the suitability and eligibility requirements of the rules and must be satisfied that they are met in order to issue a visa. AODMs can issue visas if they are satisfied all the requirements of the rules are met and can refuse where they are not satisfied the eligibility requirements, other than genuine student (the evidential requirements), are met or the CAS has been withdrawn. Where an AODM has concerns that the suitability requirements of the rules are not met or a genuine student rule credibility assessment is required, they must re-route the application to an EODM for further consideration. See the Re-route as Complex (RCX).

The routing includes nationality-based differentiation where this is supported by objective data which evidences a link between a person's nationality and the likely complexity of an application. For some applicants this may result in more rigorous scrutiny, for example, where they meet a risk profile that has a nationality element. Direct discrimination on the basis of race (nationality) is **only** permitted where it has been authorised by a Ministerial Authorisation (MA).

More rigorous scrutiny can include any or all of: enrichment (additional checks including interview), referral to a senior caseworker for case consideration or mandating a decision assurance check. The appropriate scrutiny will be defined by a risk profile or determined by caseworkers or enrichment teams in line with guidance.

The CARS(S) system has been considered under the Equality Act 2010 and the public sector equality duty (PSED). Equality impact assessments (EIAs) have been made covering the CARS(S) process, as well as the use of risk profiles, bulk data tables and each person-centric attribute (PCA) in the routing process. The EIAs consider the impacts on protected characteristics and ensure that the system does not include direct discrimination unless supported by an MA (in relation to race/nationality), or there is objective justification (in relation to age). They also ensure that any indirect impact is justified and is a proportionate means of pursuing the legitimate aim of ensuring the overall integrity of the immigration system.

VSI staff are required to continually review the impact of policies and processes, and if they identify any equality or discrimination issues, they must raise them without delay with the Central Services Team (CST) for further consideration.

While CARS(S) uses basic algorithms to reach a complexity outcome, it is not automated decision making or machine learning. **CARS(S) will identify the complexity level so that the application can be routed to a relevant caseworker grade**.

Related content
Contents
Re-route as Complex (RCX)

Related external links
Immigration Rules
Student guidance (internal version)
Student guidance (external version)

Complexity

CARS(S) introduces 2 routing outcomes based on complexity: NCX (non-complex) and CX (complex).

Single PCA – NCX direct routing (NCXDR): As the Student route is a sponsored route with more prescriptive evidential requirements, the default routing for all applications at the start of this process is NCX.

Single PCA – CX direct routing (CXDR): where an application matches a risk profile, bulk data table entry or a PCA which has been identified as a **strong indicator** of complexity, such as answering yes to any criminality question, this indicates that the application is likely to require more rigorous scrutiny for a decision maker to determine whether the applicant meets the requirements of the Student rules.

NCX applications would normally be processed by an AODM, although where a Study operation has insufficient AODMs to assess all NCX applications, an EODM should make the decision to avoid processing delays.

Related content
[Contents](#)

CARS(S) routing process steps

All Study operations must ensure that relevant Student applications are routed using these process steps to determine the complexity outcome.

Step 1: Default routing for Student applications

As the Student route is a sponsored route with more prescriptive evidential requirements, the default routing for applications under this process is non-complex. An application will only be routed as complex where an application meets a complex indicator.

Step 2: Evidence based risk profiles and bulk data tables

All applications covered by this guidance will be considered under Step 2.

CARS(S) will automatically identify applications which match a risk profile or a bulk data table entry by checking information contained in the visa application and confirmation of acceptance for studies (CAS) against a table listing the profile attributes or known harm data.

Where an application matches a risk profile and/or bulk table data, it must be recorded as single PCA complex direct routing through the abbreviation CXDR. The complexity case marker is not part of the decision making process but is used for routing purposes only.

An application marked as CXDR must be routed for more rigorous scrutiny as defined in the section on approach to routing.

Evidence based risk profiles

Risk profiles are combinations of attributes that are linked to immigration harm where similar behaviours have been identified, and/or sponsor cancellations resulting in visas being cancelled. Study operations can produce their own risk profiles or use those identified by Immigration Intelligence. Both must be cleared through the Central Services team (CST).

Profiles must be supported by objective statistical data. Any profiles which differentiate on nationality may only do so in relation to the countries on a Ministerial Authorisation (MA) and must demonstrate a rational link to the relevant MA dataset.

All profiles (whether or not they differentiate on nationality) must also be supported by an equality impact assessment (EIA) giving due regard to potential equalities impact. The EIA must be approved by the Study Deputy Director, these cannot be delegated. Where there is a potential indirect impact identified based on protected characteristics, the EIA must demonstrate that use of the profile has a legitimate aim and is justified and proportionate. Profiles must not include any element of direct

discrimination unless an authorisation exists for that nationality, or there is an objective justification for age.

Each risk profile should also identify what type of more rigorous scrutiny is appropriate. Often this will be referral for enrichment, but it may, for example, be that routing the application to an EODM is sufficient.

Profile example

An evidence-based risk background document has been provided by Immigration Intelligence stating that students from an MA nationality, attending a specific course, living in their country of nationality and applying at a specific visa application centre (VAC) have been found to be submitting forged bank statements. Applications that match this profile should be routed for more rigorous scrutiny at Step 2, classified as CXDR and assessed by an EODM after enrichment.

Risk profiles will be stored in an FCDO SharePoint library, accessible by all EODMs so they understand the routing rationale leading to a CXDR outcome.

Bulk data tables

Bulk data tables are used to identify applications that include data such as email addresses and telephone numbers that have been identified as having been used in previous fraudulent applications.

Study operations can submit entries for inclusion in the bulk data table to CST with an accompanying profile document setting out the evidence and justification for including the entry. CST will consider whether to approve the entry. A centralised bulk table has been created for use by Study operations.

When CARS(S) identifies a match to bulk data information, the application must be routed to the enrichment team for more rigorous scrutiny who must confirm the match. If CARS(S) incorrectly identifies a match to a bulk data table, the enrichment team must not enrich the application and must route the application to an EODM.

For example, a telephone number can be added to the application form in more than one format. Customers may choose to include (or not) international dialling codes, for example:

> a UK telephone number could be presented as 00 44 7999 111 111 or +44 7999 111 111 or 07999 111 111. Where CARS(S) identifies a match to the final 9 digits, in this instance 999 111 111, a caseworker must check that the telephone number matches in full the information in the bulk table data (in this instance dialling code if applicable + 7999 111 111).

Step 3: Single PCA direct routing

CARS(S) uses PCAs that have been identified as **strong indicators** (single PCAs) that an application is likely to require more detailed assessment or does not meet the

evidential requirements of the rules. Where an application matches one of these single complex PCAs they will be routed as CXDR and allocated to an EODM for assessment.

You can find full descriptions of these indicators in the [Complex PCA tables](#).

CARS(S) identifies responses made by the applicant in the visa application and information provided in the CAS, and routes the application as single PCA complex (CXDR) based on the responses to the relevant PCA questions.

If the application does not meet a single PCA direct routing, the application will retain the default NCX complexity

End of process outcomes

At the end of the step process CARS(S) will provide a routing outcome.

Study operations must ensure they classify CX applications' complexity by using 'Change risk rating' in Proviso and selecting the appropriate complexity routing. Operations must record the change reason as 'outcome of streaming tool'. Applications which retain the NCX complexity will not require a change to Proviso and will be considered NCX where no complexity rating is shown.

The complexity codes are used to route applications to the appropriate caseworker grade. Study operations can generate management information (MI) using the Business Activity Monitoring (BAM) overview or the Proviso 'Event Note Search'

If Study operations wish to add any sub codes to the spare field to assist workflow efficiency, they may do so but only after consultation with CST.

Related content
[Contents](#)
[Complex PCAs tables](#)

Person-centric attribute (PCA) framework

The aim of PCAs is to indicate to Study operations the likely complexity of an application in order to allocate it to the appropriate caseworker for assessment.

CARS(S) outcomes are determined by single PCAs, as explained earlier. Each application is given a complexity rating (see the Complexity section for descriptions of these outcomes):

- Single PCA – NCX direct routing (NCXDR)
- Single PCA – CX direct routing (CXDR)

As the Student route is a sponsored route with more prescriptive evidential requirements, the default routing for applications under this process is non-complex. An application will only be routed as complex where an application meets a complex indicator.

Applications under the Student route are assessed against the requirements of Appendix Student. The Student and Child Student guidance:

- Student and Child Student guidance (internal version)
- Student and Child Student guidance (external version)

sets out a number of factors that can be considered by caseworkers that may help in making that assessment, although most of the evidential requirements are prescriptive. As well as considering the Student rules (including the genuine student rule), caseworkers must also consider whether an applicant should be refused under Immigration Rules part 9: grounds for refusal.

The PCA framework identifies attributes that are relevant to the assessments that caseworkers need to make and that are common to applications which are considered complex. The visa application form includes questions which allow applicants to provide relevant information, which along with information from the sponsor contained within the CAS CARS(S) matches to the identified attributes.

Once an application is assigned to a caseworker, based on its complexity outcome, the decision maker must assess it against the requirements of Appendix Student (the Student rules). Caseworkers must not use the complexity routing as a basis for their assessment of an application.

Study operations are encouraged to provide feedback to aid in the ongoing evaluation and development of CARS(S). Regular governance calls will be held with the Study network to review performance and possible changes, including identification of other relevant attributes. Any additional attributes must be agreed by the Central Services Team (CST) and will require a full EIA.

Applications under this guidance where single PCA direct routings will be used

Single CX PCAs are strong indicators that an application is likely to require more rigorous scrutiny for a caseworker to determine whether the applicant meets the requirements of the Immigration Rules. These will be allocated to the appropriate grade of caseworker based on the single PCA direct routings.

Allocation directly as complex (CXDR)

Single PCAs that route as CX can be found in tables A and B below.

Table A

Applications routed CX in Table A are considered to be the least straightforward to assess as they include an attribute that indicates that the application is likely to require more rigorous scrutiny for a caseworker to determine whether the applicant meets the requirements of the Immigration Rules. These applications must be assessed by an EODM, who must assess the applications in accordance with the rules and Student guidance and conduct a full genuine student rule assessment in order to be satisfied whether, on the balance of probabilities, the requirements of the Immigration Rules are met.

Table B

Applications that are routed CX in Table B have been identified as applications where the applicant does not hold a valid CAS. These applications are likely to require more rigorous scrutiny as a valid CAS is a mandatory requirement. These applications can be assessed by an AODM but still require a full consideration against the requirements of the Immigration Rules and Student guidance.

Official – sensitive: start of section

The information on this page has been removed as it is restricted for internal Home Office use.

The information on this page has been removed as it is restricted for internal Home Office use.

The information on this page has been removed as it is restricted for internal Home Office use.

Official – sensitive: end of section

Related content
Contents

Decision making

The overall process is set out within a separate process guide which details the steps taken to determine the complexity of applications in bulk by workflow teams.

Study operations must maintain a clear distinction between CARS(S) routing and caseworking and ensure that the routing of a case does not influence the decision on an application. The routing based on the outcome of CARS(S) must be used only to indicate the likely complexity and subsequent handling.

All decision making in CARS(S) routed applications must be made in accordance with the Immigration Rules and Student and Child Student guidance.

Decision makers must conduct [Operating Mandate](#) checks on all applications.

Re-route as complex (RCX)

AODMs must re-route a NCX application to complex (RCX) if:

- an application is subject to an adverse UKVI Operating Mandate match
- the application includes evidence which, following consideration, indicates irregularities, and the caseworker considers that further analysis or checks are required to confirm the veracity
- a previous application has been refused on suitability grounds (suitability grounds means a refusal under paragraph 9.7.1 or 9.7.2 of the Immigration Rules, or, prior to 1 December 2020 a refusal under paragraph V3.6 or paragraph 320(7)(a) of the Immigration Rules then in force)
- they have any concerns about modern slavery or safeguarding
- they have any other doubts about the evidence presented
- they have **any** other concerns as to genuineness and / or suitability

Complex and non-complex decision making

AODMs are primarily trained to make administrative decisions, where the statements in the application can normally be verified by checking against the supporting evidence and any other information provided.

When an AODM 're-routes as complex' (RCX) an application to an EODM, they must complete a full case note in Proviso explaining the reasons and ensure the application is routed to ECO assessment in Proviso which will ensure the application is allocated to an EODM. The event note will vary depending on Study operations practices, but this can be done within the change complexity rating event in Proviso when changing from NCXDR to RCX. By changing complexity rating it aids workflow routing and MI counting for the number of cases which are being re-routed.

EODMs must assess each application against the Immigration Rules and each application will be decided based on the information provided by the customer and any other relevant factors at the date of decision. **There must be no presumption**

that an application will result in a particular outcome based on it being routed to or re-routed to an EODM.

Related content
[Contents](#)

Enrichment

Enrichment is one of the types of more rigorous scrutiny that can be applied to an application. Examples of enrichment include document verification, requests for further evidence and interview of the applicant or a sponsor.

The framework has 3 levels of checks:

- [UKVI Operating Mandate checks](#)
- profile directed checks: where an application has matched a risk profile or an entry in a bulk data table, the profile / table will direct recommended checks
- caseworker directed checks: where a caseworker identifies any irregularity in the information or evidence provided the application may be referred for enrichment on a case-by-case basis

[Operating Mandate checks](#) must be conducted on all applications.

Profile directed checks
Where a profile match is found, the application must be deferred to the relevant team for further enrichment checks. The ultimate decision to conduct the defined check will be determined by that team. In some cases, experience might inform that checks cannot be successfully completed or a more appropriate check in place of the profile defined check is now available.

Where enrichment is directed by a profile, the application must be recorded as CX and thereafter assessed by an EODM following the outcome of any the checks completed.

Nationality based enrichment is not permitted unless there is an approved risk profile supported by the MA.

When an application matches a defined profile the relevant scrutiny to be carried out will be defined in the CARS(S) outcome.

Caseworker directed checks
EODMs can refer any application for enrichment on a case-by-case basis.

AODMs would not normally commission any enrichment checks as the type of activity requiring a check for an NCX application is likely to require to be [re-routed to complex](#) RCX) in line with the Study guidance. Any referral for enrichment should be agreed with a senior caseworker unless a standing instruction has been issued by Study operations.

In some circumstances a senior caseworker may authorise an AODM to conclude an NCX application that the AODM has raised a concern about, without it being re-routed or additional checks being completed. The senior caseworker must have considered the wider evidence and must be satisfied that a decision can be reached on the basis of that information. In these circumstances, the senior caseworker must justify their decision in an event note before enabling the AODM to proceed.

Official – sensitive: start of section

The information on this page has been removed as it is restricted for internal Home Office use.

Official – sensitive: end of section

Examples of enrichment checks

The type of checks which might be undertaken by to deliver effective enrichment are below. This list is not exhaustive.

Types of checks include:

- business registration
- management information and data analytics (MIDA) / Exit checks
- forgery examinations
- 5CC / other missions
- bank / financial institution
- education documents
- local tax
- open source
- Companies House
- Telephone or online interview
- multiple sponsor check
- verification + (including DWP)
- UK – birth / marriage / death certificates
- employment checks
- person search / CRS / CID
- GB accelerator
- sponsor interview
- Her Majesty's Passport Office (HMPO) / nationality
- other immigration authority

Study operations should continue to work closely with Immigration Intelligence colleagues to produce awareness briefings for decision-makers. These may inform other potential scenarios for enrichment checks.

The outcomes of all enrichment activity, positive and negative, should be considered at the monthly Operational Review Meeting (ORM) with Immigration Intelligence teams and used to inform profiles and direct future enrichment. Details of the consideration should be recorded in the operations decision log.

Related content

[Contents](#)

Training

Modular training packages for both AODM and EODM have been created by the Study Entry Clearance Training Team and cascaded to Study Entry Clearance operations for delivery to decision makers, these include:

- Confirmation Bias and Equality Act training to refresh awareness of equality discrimination legislation
- Fraud Awareness training to aid the identification of fraudulent documents and harm indicators as well as cases routed as non-complex which may be fraudulent

The AODM Training Course is updated regularly as the rules and Student guidance change. Changes in this guidance will also be reflected in the course.

New AODMs should not be allowed to assess NCX applications until they have received the latest AODM training and met the required standard on the , Confirmation Bias, Equality Act and Fraud Awareness courses.

Existing operational AODMs, who have previously been trained and met the required standard, must read this guidance before continuing to assess NCX applications.
Related content
Contents