



OISC 2023/24 business plan priorities

The following pages set out the OISC's priority outcomes and objectives for 2023/24 which support the delivery of the strategic objectives. Throughout 2023/24 we will hold ourselves to account and monitor our progress against these objectives and measures.

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Introduction

The Office of the Immigration Services Commissioner (OISC) 2023/24 Business Plan sets out our priorities and how we will deliver our services for 2023/24.

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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 £4.04m, with 60 employees and based remotely, 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

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Our vision

The OISC vision for 2023-2026 is:

- Advice seekers needing immigration advice will be able to access and receive high quality advice from registered reputable and reliable advisors across the UK
 - Advice seekers will be knowledgeable of services available, including how to complain, aware of how to access good advice and avoid the pitfalls of illegal activities by unregistered individuals
 - Advice seekers will be protected from illegal advice giving which will be routinely identified and disrupted with those responsible being prosecuted when within the public interest
 - Advice seekers will benefit from the OISC being a successful high performing, data enabled organisation putting the needs of the Advice Seeker at the heart of what it does
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Our strategic objectives

Our four strategic objectives that provide the framework for how we will achieve our vision are:

Enable

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

Regulate

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

Enforce

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

Engage

We will ensure advice seekers and those around them know how and why to access advice from a registered adviser. We will collaborate with others to create a system that is transparent and easy for the advice seeker to understand and navigate.

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Business plan activities

Objective 1: Enable

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

Team	Objective	Outputs and Measures
Business Planning	<ul style="list-style-type: none"> • Develop a challenging yet realistic Annual Business Plan that builds on the previous years that is prepared and approved by HOSU and Ministers • Through rigorous monitoring, the OISC will OISC delivers Business Plan objectives • Corporate and operational Risks and issues are identified and managed with appropriate mitigating actions • An annual Internal Audit programme is delivered in collaboration with the GIIA 	<ul style="list-style-type: none"> • Corporate and Business Plans approved by HOSU and Ministers in a timely manner • Number of outstanding areas at each quarterly performance review • Monthly risk review meetings with heads of departments • Nil outstanding internal audit recommendations against timescales reported at ARAC
Customer Service Unit	<ul style="list-style-type: none"> • Develop IRIS CSU reporting capabilities, to enable bi-monthly reports highlighting individual enquiry trends and actions taken as a result • Launch CSU portal & 'knowledge bank' to aid accessibility, consistency, reduce repetition and improve digital communications • Hold a series of 'drop-in' sessions for potential advisers on how to register • Implement a CSU external customer satisfaction survey 	<ul style="list-style-type: none"> • Bi-monthly reports • The CSU either responds to, or refer to the regional teams, 90% of all enquiries within two working days • Regional teams respond to 90% of all CSU referrals within 8 working days • 10 knowledge articles to be available in the knowledge bank by end of year • Feedback from 'drop-in' sessions • 80% of customer service users will state in surveys they are either satisfied or very satisfied with their interactions with the Customer Service unit

Business plan activities (continued)

Team	Objective	Outputs and Measures
Complaints	<ul style="list-style-type: none"> • Launch complaints portal to make it easier for the public to complain • Update the OISC website to inform potential complainants on the early resolution and formal complaints process • Maintain mechanisms to monitor customer satisfaction through complaints survey • Develop IRIS complaints reporting capabilities, to enable bi-monthly reports highlighting trends and actions taken as a result 	<ul style="list-style-type: none"> • Active complaints portal • Electronic complaints form accessible via the complaint's portal with functionality for the complainant to view submitted complaints • Updated video active on OISC website • Feedback from complaints surveys indicates that 80% of respondent complainants found their complaints were considered in a timely, fair, and proportionate manner • Bi-monthly reports • 85% of complaints against regulated advisers are resolved or determined within five months of the complaint being received • 85% of complaints against staff are resolved or determined within two months of the complaint being received • 70% of complaints against unregulated advisers are resolved or determined within six months of the complaint being received • 100% of quality assurance checks show the correct determination was made (regulated complaints) • 100% of complainants are informed of the progress of their complaint every six weeks (regulated complaints)

Business plan activities (continued)

Team	Objective	Outputs and Measures
External communications	<ul style="list-style-type: none"> Establish a regular drumbeat of info giving/educating/social media campaigns throughout the year to ensure Advice seekers will be knowledgeable of services available, including how to complain, aware of how to access good advice and avoid the pitfalls of illegal activities Name those acting illegally where data is already in public domain OISC engages effectively with advice seekers, advisers, and key stakeholders' views taken into account through formal consultations Advisers & other key stakeholders have greater awareness of OISC activity and key issues and have opportunities for two-way communication 	<ul style="list-style-type: none"> Videos developed and promoted 1 social media campaign a month 20% increase in website traffic to the Adviser Finder and Adviser Register on the OISC site 20% increase in website traffic to complaints page/portal on the OISC site 1 national media campaign re pitfalls of illegal advice (UN Migration Week) 20% increase in followers on Facebook, Twitter & LinkedIn 10% increase in subscribers on YouTube 100% of organisations/ individuals that are being prosecuted are published online and shared with all relevant stakeholders Formal consultation documents developed in required format and timescales Newsletter for advisers to be issued at least 4 times a year Videos developed and promoted re: How to become a registered adviser
Internal communications	<ul style="list-style-type: none"> Develop and deliver the existing internal communications and staff engagement plan to further embed two-way engagement and creates the foundation for building high performing teams Expand use of digital communications, fully exploiting Sharepoint for two-way communications (Communications section) 	<ul style="list-style-type: none"> Through an internal communications staff survey, 90% of staff will confirm they are either satisfied or very satisfied with internal communication channels No of staff in attendance at staff conferences At least three new articles posted on Sharepoint (Communications section) every week

Business plan activities (continued)

Team	Objective	Outputs and Measures
ICT & Information Security	<ul style="list-style-type: none"> Contract manage external suppliers in their delivery of cloud-based services, ensuring value for money, compliance with KPIs and the availability of ICT systems Ensure delivery of service in all circumstances Ensure the ongoing cyber security of OISC ICT systems resulting in minimised breaches and data incident occurrences and their impact OISC data management conforms with relevant information security legislation and standards: GDPR DP Act & ISO27001 Ongoing relationship management with external suppliers to ensure a good working partnership 	<ul style="list-style-type: none"> XMA will ensure System monitoring availability is >99.9% XMA will respond to >90% of: <ul style="list-style-type: none"> Priority 1 Issues & Major Incidents within 4 hours Priority 2 Issues within 8 hours Priority 3 Issues: 12 hours In line with KPIs for the relevant external providers; BlueWave, MoorePay & FinanSys Successful disaster recovery exercise 100% of all available patches & software updates to be implemented instantaneously XMA will manage a quarterly release cycle for Microsoft patches Annual penetration test of all cloud-based systems Ongoing monthly monitoring of intrusion attempts on the OISC firewall 0 successful phishing attacks 6 monthly staff briefing or training session on data security and how to report breaches 0 known breaches of the GDPR & DP Act Data Monitoring Board review all incidences and identify guidance to be issued to proactively reduce and prevent incidences and breaches occurring Quarterly reports demonstrates that 90% of data within Sharepoint and IRIS meet data standards Delivery of service meets required standards as per KPIs

Business plan activities (continued)

Team	Objective	Outputs and Measures
Finance	<ul style="list-style-type: none"> • Effective budget management and controls are strictly adhered to within allocated funds • Counter anti-fraud activities are identified and maintained across all OISC departments • Accounts and accounting practices meet the requirements of the auditors and sponsor department • Review and streamline finance processes to maximise productivity and efficiencies 	<ul style="list-style-type: none"> • 100% of monthly management accounts demonstrate OISC budgets remain within allocated funds with any exceptions agreed with the Commissioner • Quarterly fraud and error reports to Counter Fraud Finance at the HO, demonstrate NIL fraudulent activities occur within OISC • 100% of returns to sponsor unit meet HO requirements • Achieve unqualified accounts with no management override with financial statements which are accurate with no material misstatements • 5% efficiency saving in time spent on financial processes • Upgraded finance system
Knowledge & Information Unit	<ul style="list-style-type: none"> • Develop a strategic analytical capability to determine how best to collate and analyse data that will enhance OISC business decision making • Improve real time advice provided to operational teams on potential illegal advice-giving activities • Develop with relevant leads robust horizon scanning capability that can collate and assess meaningful information to inform effective decision making 	<ul style="list-style-type: none"> • Info and analysis requirements scoped • Gap analysis findings • Reporting mechanisms in place • KIU staff have the required skills & expertise • Re-designed intelligence function • Horizon Strategy Implementation plan

Business plan activities (continued)

Team	Objective	Outputs and Measures
<p>People and Culture</p>	<ul style="list-style-type: none"> • Successfully embed new ways of working by implementing modern working practices that enable individuals and teams to grow develop and do their best work in delivering business outcomes • Staff are adequately rewarded for their roles and pay policy is implemented fairly and equitably • All staff are professionally competent and confident to undertake their role and have the necessary skills to become high performing diverse teams 	<ul style="list-style-type: none"> • New PM process is implemented and fully operational • 100% workplace assessments conducted for all new staff within 1 week of joining & all necessary equipment, guidance, and support in place for staff to be able to work in a safe healthy environment • Core HR policies reviewed and benchmarked against CS and other public sector organisations • Satisfactory audit of payroll processes & key staff fully competent in payroll management and protocols • Consistent use of target salaries in recruitment, internally and externally • All budget allocated for thank you scheme and distribute funds for exceptional performance and contribution evenly throughout the year • Implement training plan

Business plan activities (continued)

Objective 2: Regulate

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

Team	Objective	Outputs and Measures
Authorisations Team	<ul style="list-style-type: none"> • Assess the competence of advisers applying for registration • Make quality decisions on applications (new registrations, re-registrations and from existing advisers to raise levels of change legal entity) in a timely manner • Create web based OISC registration forms, including taking payment online • Audit regulated organisations to provide assurance that advisers regulated by the OISC continue to be fit and competent to provide advice. Where appropriate, work with organisations to improve their performance • Ensure the integrity of immigration advice by robustly removing from the OISC scheme those organisations that are no longer fit or competent to act on behalf of the advice seeker • Investigate complaints against regulated advisers in a timely proportionate manner, including seeking recompense for the advice seeker wherever possible 	<ul style="list-style-type: none"> • 100% of applicant advisers are put forward correctly for onboarding for next available competence assessment • New contract with preferred bidder • 80% of all completed Level 1 applications for individual adviser and organisation applications completed within 3 months • 90% of all completed applications for individual adviser and organisation applications completed within 5 months • 100% of quality checks show agreement with decision made as to whether to admit adviser to the scheme and risk rating given • 95% of all completed 'straightforward' continued registration applications completed within 15 working days • 95% of all continued registration applications are decided within 3 months • 100% of quality checks show agreement with decision made as to whether to re-register adviser

Business plan activities (continued)

Team	Objective	Outputs and Measures
Authorisations Team	<ul style="list-style-type: none"> Oversee the regulation of immigration advisers in Scotland and Northern Ireland, through oversight of the regulatory activities of the Designated Professional Bodies (Law Society of Northern Ireland, the General Council of the Bar of Northern Ireland, the Law Society of Scotland and the Faculty of Advocates) Consult on new codes for advisers, as part of moving to a more principles-based approach to regulation 	<ul style="list-style-type: none"> 100% of quality checks show agreement with decision made as to whether to approve raising of level of change of legal entity New digital forms 70 audits on organisations that are most at risk of non-compliance, including 3 audits at short notice (48 hours) 4 audits of organisations in the B risk category Micro-audits on 16 organisations in risk category A 85% of identified issues reports are dispatched within 10 working days of the audit completion date 100% of quality checks show agreement with outcomes of audit Number of organisations in risk category C moved out of this category either by moving to risk category B or being removed from the scheme Number of organisations in risk category C to be moved out of this category either by moving to risk category B or being removed from the scheme (mirrors target above) 100% of decisions to cancel or refuse registration are issued within 20 working days of the conclusion on fitness or competence being made

Business plan activities (continued)

Team	Objective	Outputs and Measures
Authorisations Team		<ul style="list-style-type: none"> • Updated guidance on removing organisations from OISC scheme • Monthly meeting within each region • Quarterly meeting across regions • 85% of complaints against regulated advisers are resolved or determined within five months of the complaint being received • 100% of complainants are informed of the progress of their complaint every six weeks • 100% of quality checks show that the correct determination was made • Amount of money paid in compensation as a result of regulated complaints • 4 annual meetings • Consultation document & response document • Number of respondents to consultation • Updated documents, guidance, and processes • Number of engagement activities

Business plan activities (continued)

Objective 3: Enforce

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

Team	Objective	Outputs and Measures
Regional Teams	<ul style="list-style-type: none"> • Review the OISC approach to enforcement to determine how best to enhance the OISC's effectiveness in detecting, investigating, and disrupting illegal advice giving, and implement new approach • DETECT - Utilise the full range of intelligence available to detect immigration advisers operating illegally • INVESTIGATE - Conduct investigations where illegal advice giving is indicated or suspected, including in response to complaints, and prosecute cases where appropriate • DISRUPT - Take proactive action to disrupt illegal advice giving 	<ul style="list-style-type: none"> • Report on findings • Enforcement strategy & action plan • Number of actions complete • Number of enforcement engagement activities - measure baseline • 70% of criminal investigations (including complaints against unregulated advisers) will be resolved within 6 months • 90% of criminal investigations will be resolved within 12 months • 25% increase in enforcement outcomes (notice of investigations, formal warnings, restitutions, reprimands, warrants, prosecution assists, organisations applying for regulation) • Amount of money paid in compensation as a result of complaints against unregulated advisers • Number of convictions secured • Number of actions taken (cease and desist notices, notice of investigations, prosecution assists, warrants, formal warnings) • Number of illegal advisers who cease illegal activities as a result of our actions

Business plan activities (continued)

Team	Objective	Outputs and Measures
Intelligence	<ul style="list-style-type: none"> • Process intelligence received to create actionable insights to support enforcement, regulatory and engagement activity • Conduct necessary checks on all advisers and organisations applying for regulation to ensure fitness • Review the collection of intelligence via already established processes and engagement to ensure they support business need • Develop closer working relationships with the Home Office to improve intelligence flows in identifying illegal activities 	<ul style="list-style-type: none"> • 35% increase on referrals leading to criminal investigation, regulatory action, or engagement opportunity • 75% of vetting checks completed within 10 working days • 100% of quality checks show vetting checks completed accurately • Number of checks completed • Number of advisers identified as unfit from vetting process • Updated process for vetting checks • Updated process for prioritising intelligence • Training undertaken • New process for notification of advisers visiting Immigration Removal Centres • Increased number of intelligence referrals
Legal	<ul style="list-style-type: none"> • Implement the recommendations from the Legal Services review to transform the Legal services team into a multi-skilled, forward-thinking team with a new model of working • Ensure legal proceedings (Criminal and civil) before II Courts and Tribunals are conducted in a professional, competent, and effective manner • Ensure OISC staff are working to relevant legislation including data protection and freedom of information requirements 	<ul style="list-style-type: none"> • Review findings • Findings implemented • 85% of decisions are upheld at Tribunals • 100% of changes in case law, new guidance and statutory provisions will be communicated to all relevant staff • 6 monthly report demonstrates that: <ul style="list-style-type: none"> • 100% of FOI requests responded to within 20 working days • 100% of data protection request responded to within one month

Business plan activities (continued)

Objective 4: Engage

We will ensure advice seekers and those around them know how and why to access advice from a registered adviser. We will collaborate with others to create a system that is transparent and easy for the advice seeker to understand and navigate.

Team	Objective	Outputs and Measures
National Engagement	<ul style="list-style-type: none"> • At a national level, develop and significantly increase engagement activities with all priority key stakeholders identifying scope for partnership working and to develop horizon scanning capabilities • Develop an understanding of the migrant and asylum seekers journey identifying opportunities for the OISC to be promoted at the key stages 	<ul style="list-style-type: none"> • Clearly defined stakeholder mapping • Rationalised programme of surveys designed to meet key data needs • Number of national community engagement activities with advice seekers, advisers, other stakeholders • Number of national joint working/partnership initiatives • No of horizon scanning mechanisms established • Relationship map • Data analysis to show our impact on the system • Number of meetings with other regulators • Migrant and asylum seeker journeys understood and documented • OISC literature (including videos and leaflets) available at key stages in the advice seeker journey

Business plan activities (continued)

Team	Objective	Outputs and Measures
Regional	<ul style="list-style-type: none"> • At a regional level, implement engagement priorities by building relationships within each region and develop insights into key OISC issues • Strengthen engagement with regulated advisers to aid our understanding of the sector and the nature of advisers' businesses • Advice seekers, advisers, and key stakeholders' views are taken into account through formal consultations 	<ul style="list-style-type: none"> • Regional engagement plans • Number of engagements per region (establish baseline) • Engagement officer in each region • Data requirement statement • Updated form with additional fields about adviser's businesses • 3 meetings/online conferences • Feedback from advisers on opportunities made available • Number of advice seekers, advisers and stakeholders who have been engaged with and provided feedback as part of consultation process
National Engagement & Knowledge & Information Unit	<ul style="list-style-type: none"> • Themes from all OISC engagement activities are collated to identify best practice and lessons learnt 	<ul style="list-style-type: none"> • Bi-monthly reports

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Our ASPIRE programme

Alongside our Business Plan activities, in 2023/24 we will deliver our ASPIRE Programme which is the next phase of our business transformation in becoming a high performing, data enabled organisation putting the advice seeker at the heart of everything we do.



OISC 2023/24 business plan priorities