



**Immigration
Advice
Authority**



Immigration Advice Authority (IAA)

Corporate Plan
2025/2027

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Foreword



I am confident that the staff of the IAA have the determination and enthusiasm for this enhanced agenda, and that together we will deliver the many outcomes of this plan.

John Tuckett

The previous Office of the Immigration Services Commissioner (OISC) Corporate Plan set out an ambitious programme of activities and change, much of which was achieved despite the COVID-19 pandemic restricting many activities.

In 2024, the OISC developed a new brand and identity, and in early 2025 will launch itself as the Immigration Advice Authority (IAA). This Corporate Plan sets out our ambitious aims for the IAA as we continually strive to be a high performing organisation, keeping the advice seeker at the heart of all we do.

In a world where global migration levels and patterns already exceed anything previously experienced, immigration is and will remain a top UK Government priority for years to come. My aim as Commissioner is to ensure that a thriving immigration advice sector does all it can to uphold the integrity of the wider system, being an integral part of that system and working closely with all those within it.

Though one organisation, the IAA carries three distinct roles: as regulator, we offer invaluable regulation of advice services; as enforcer, we disrupt illegal activity with targeted enforcement; and as developer, we enhance practice across the sector through comprehensive guidance, support and engagement.

The IAA will build on the successes of the OISC and with its new brand, inject new energy and enthusiasm into its work. My aim is for a seamless transition from the OISC to the IAA, at the same time as introducing a new sense of ambition and determination to tackle a wider agenda that has not been possible in the past.

This plan therefore sets out an enhanced agenda than its predecessor; one that I believe will have significant benefits for those seeking advice, for professional advisers, and for the wider immigration system.

Critical to the IAA delivering this plan will be the development of a new funding model for the IAA to provide alternative income streams, and the acquisition of powers to give additional teeth to our enforcement activities, bringing the IAA in line with other regulators. I shall be working with Home Office officials and ministers to explore options for these issues as soon as possible in the life of the plan.

I am confident that the staff of the IAA have the determination and enthusiasm for this enhanced agenda, and that together we will deliver the many outcomes of this plan.



J. Tuckett

John Tuckett

Immigration Services
Commissioner

Section 1

The Immigration Advice and Services Sector

Accessing immigration services and advice is often the first point of contact migrants and asylum seekers have with the wider immigration system. The immigration advice and services sector can be seen as a gateway through which people pass and then submit applications to remain or arrive in the UK.

Good quality immigration advice ensures that advice seekers receive the guidance they need to navigate their immigration journey successfully. A thriving, robust, and effective sector, in turn, helps individuals make informed decisions, leading to better outcomes throughout their immigration process. Conversely, an ineffective sector results in inadequate applications leading to long delays, legal challenges, and an overall loss of confidence in the system.

High-quality immigration advice, readily available to all, is an essential prerequisite for an effective immigration system.

The landscape is complex, with many different sources of advice, some regulated, some not, some charged for, and some free of any charges.

By law, immigration advice can only be given in the UK by a body or individual who is registered and regulated by the Immigration Advice Authority, a Designated Qualifying Regulator or Designated Professional Body, such as:

- Professional organisations/individuals such as immigration advisers regulated by the Immigration Advice Authority (IAA), solicitors regulated by the Solicitors Regulation Authority (SRA) or the Law Societies of Scotland and Northern Ireland, barristers regulated by the Bar Standards Board (BSB) and the Bar of Northern Ireland and the Faculty of Advocates and Legal Executives by the Chartered Institute of Legal Executives (CILEX) Regulation.

- Bodies that are exempt from regulation such as educational institutions and health sector bodies, and employers where advice is provided free of charge to employees and prospective employees.

However, this is not always adhered to, and advice is made available from many different sources, such as:

- Social media channels and the internet, where advice may or may not be regulated.
- Bodies operating from outside of the UK who are not within the jurisdiction of UK regulators.
- Individuals, local organisations, families and friends, all of whom may try to support migrants and asylum seekers with advice but be unaware that they may be acting illegally.

Challenges facing the Immigration Services and Advice Sector

Challenges within the sector include:

- A lack of awareness within the public about who can legally provide immigration advice, and using an unregulated adviser exposes individuals to the risk of extortion and increases the likelihood of unsuccessful applications.
- The sector has many advice providers who seek to subvert immigration rules. Whilst some come from within regulated bodies, most are individuals who are providing advice whilst not registered or regulated and are often deliberately acting outside of the law. They pose a major threat to the integrity of the immigration system and frequently extort large sums of money from vulnerable migrants. The extent of these activities and linkages with other forms of crime, such as

human trafficking, is not well established but it is suspected that what is known about is the “tip of the iceberg”.

- As global migration patterns develop and grow, the demand for advice is increasing year on year. Currently, there is evidence¹ that advice available across the UK does not meet the need or demand. This creates a vacuum into which illegal operators readily move. Developing new ways of providing advice, and enhancing registered adviser numbers and availability, are all needed.
- The sector with its varying sources of advice and multiple regulators, all with their own ways of working, creates a confusing landscape, which could be exploited by illegal operators. Improved regulatory collaboration is needed to ensure good quality advice is easily accessible to any seeker of advice.
- Technology and the rapid pace of change present an increasing challenge for regulators. The IAA will pursue new powers and work to develop the skills and expertise necessary to tackle these challenges effectively.
- Immigration laws and rules are constantly changing and will continue to do so to address global migration trends. Ensuring advisers are suitably knowledgeable, up-to date and competent is a growing challenge if advice is to uphold the law of the land and support government aims.

¹ Refugee Action, No Access to Justice: How Legal Advice Deserts Fail Refugees, Migrants, and Our Communities*, 2022, www.refugee-action.org.uk/no-access-to-justice-how-legal-advice-deserts-fail-refugees-migrants-and-our-communities/

Section 2

The Immigration Advice Authority (IAA)

Led by the Immigration Services Commissioner, the IAA, like its predecessor the OISC, is an arm's length body of the Home Office. Statutory duties are set by the Immigration and Asylum Act 1999, which charges the Commissioner with the overall aim of "Ensuring best practice in the provision of immigration services across the UK". The Act empowers the Commissioner to regulate immigration advisers and to investigate and prosecute those who provide advice illegally.

We are currently funded through a Grant in Aid (GIA) budget of £5.39m, with 64 employees all based in their homes across the United Kingdom. There is no central office.

We regulate over 3,700 individual immigration advisers and 2,000 organisations. To ensure high-quality advice is readily available to advice seekers, we promote good practice to immigration advisers, set standards, and make sure those standards are upheld.

Specifically, this 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.
- Taking enforcement action against those who provide immigration advice illegally.
- Overseeing those who regulate immigration advice by solicitors and barristers in Scotland and Northern Ireland where the legal systems are different.

Governance

Our governance arrangements include:

- The Immigration Services Commissioner acts as Corporation Sole and Accounting Officer and is accountable to the Home Secretary for the IAA's activities and performance. Our Home Office Senior Sponsor is the Head of Human Rights and Family Unit, Asylum and Protection Directorate within Migration and Borders, who is responsible for the policy and legal framework within which the IAA works. Our relationship with the Home Office is defined by a Framework Agreement, which includes details on accountability, governance, finance, and reporting arrangements. These matters are overseen by the Home Office Sponsorship Unit (HOSU).
- **Advisory Board:** The Commissioner is supported by an Advisory Board composed of four non-executive members, with board meetings attended by the Home Office Senior Sponsor and Home Office Sponsorship Unit as observers. The role of the board is to have oversight of all IAA strategies and progress, and to provide advice to the Commissioner on where there is a need for action or further investigation.
- **Audit and Risk Assurance Committee (ARAC):** The ARAC provides appropriate independent advice and challenge to the Commissioner providing assurance on overall governance arrangements, financial and risk management, and internal audit arrangements.
- **Internal audit:** In addition to the above there is a comprehensive internal audit programme, which is managed and overseen by the Government Internal Audit Agency (GIAA), providing independent scrutiny and assurance of our risk management, governance, and internal processes. We are also subject to external audits by the National Audit Office.



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Section 3

Vision, Mission, and Strategy

Vision

Since 2020, we have adopted a vision that puts the seeker of immigration advice at the heart of our business. In this regard our aim is to understand the generic needs of all advice seekers and determine how our regulatory and enforcement activities can best meet those needs, ensuring the provision of high-quality advice as and when it is needed. Our vision is that:

- All advice seekers receive reliable immigration advice from regulated professionals.

Mission

Our mission is that of an enabling regulator that works with all those involved in the immigration advice and services sector to bring together the informed advice seeker with reliable advice from a regulated adviser. Our mission is:

- To protect seekers of immigration advice through regulation, enforcement, and promoting best practice.

Values

All that we do and all that we are is based on five values:

- **Supportive:** We support each other, working as one organisation to deliver our mission.
- **Progressive:** We continuously improve, innovate, and look to the future with curiosity and agility.
- **Authoritative:** We act with authority and professionalism, demonstrating leadership across the advice sector for the benefit of the advice seeker.
- **Inclusive:** We create an environment that is inclusive for all, respecting, valuing, and celebrating our diverse team.
- **Collaborative:** We collaborate, welcoming different perspectives and contributions to drive success.

Corporate Plan Aims

The aims set out in our Corporate Plan for the next three years will drive significant progress in delivering our overarching vision and mission.

These aims also address the challenges set out in Section 1 above, to positively impact and support the wider immigration advice sector.

The vision and mission are ambitious. Success will be achieved incrementally over several years. Progress will be assessed by measuring trends in the following outcomes:

CP1. High-quality and reliable immigration advice from a regulated professional body or individual will be available to advice seekers as required.

KPI: This will be assessed annually through a survey of advice seekers and their representative bodies requesting feedback on perceived levels of timeliness, quality, and availability, coupled with assessments of the changes in the number of organisations deemed as high risk of delivering below standard services.

CP2. Illegal advice giving by unregulated individuals will be routinely identified, investigated, and disrupted with criminal prosecutions taking place where this is in the public interest and is needed to protect the integrity of the immigration system.

KPI: This will be assessed annually on the total number of disruptions and prosecutions achieved and the trends in these figures, supplemented by a survey of representative bodies on the impact of IAA activities.

CP3. Advice seekers will know how to access regulated advice from a professional individual or body and will be aware of the risks involved in seeking advice from an unregulated individual.

KPI: This will be assessed annually through a survey of advice seekers and their representative bodies on their level of awareness.

CP4. Through a major transformational programme, the IAA will become a high performing organisation with the culture, skills, people, modernised processes, and infrastructure needed.

KPI: Progress will be assessed by measuring a) staff engagement and b) efficiency and productivity gains achieved through modernisation and automation of processes.

Assumptions: In deriving the Corporate Plan, the following assumptions have been made:

- The demand for reliable immigration advice will continue to grow as migration patterns develop. This demand will grow from within and outside of the UK.
- The availability of reliable advice by professional bodies does not meet the current demand. Action is needed to not only maintain the current high level of quality advice, but also to address the shortfall in advisers and in finding new ways of providing advice.

- Illegal advice-giving by unregulated individuals will increase unless activities are deterred by the threat of sanctions and punishment, and their activities are regularly disrupted, with perpetrators prosecuted where appropriate.
- IAA needs to expand the range and extent of its regulatory, enforcement, and engagement activities if the above aims are to be achieved. Changes in funding regimes, which combined with expected efficiencies and increases in productivity, can support an extended range of activities.

Delivery: The Corporate Plan will form the umbrella under which annual business plans will detail the specific outcomes of what is to be achieved each year. We will monitor progress against this Corporate Plan through the four high level indicators described above, the delivery of our annual business plans, and in our annual report and accounts, which is approved by ministers and laid before Parliament. Our approach will focus on the following areas with further details of planned achievements in Annex A.

- 1. REGULATION:** Ensuring compliance with established standards for registered immigration advisers.
- 2. DEVELOPMENT:** Developing the immigration advice sector, working in partnership with advisers and stakeholders.
- 3. ENFORCEMENT:** Disrupting illegal advice-giving activities that undermine the integrity of the immigration system.

4. COMMUNICATION AND ENGAGEMENT:

Raising awareness and engaging with stakeholders to gather data and enhance joint working.

5. TRANSFORMATION: Transforming the IAA into a high-performing organisation.

Financial Strategy: The Corporate Plan is an ambitious set of proposals and activities in support of Home Office strategic objectives, enabling the sector to be an effective and strengthened gatekeeper for the wider immigration system. Delivery will require an expansion of the organisation’s capabilities and capacity.

The extent to which the Plan can be delivered will therefore be dependent upon the levels of income we receive. This is currently restricted to a Grant in Aid (GIA) allocation from the Home Office, with no ability to generate additional income or recover costs from any of our activities.

The level of GIA in recent years has remained as a flat cash allocation, of which 80% is spent on staff pay. This level of funding is likely to decrease in future years given the fiscal climate and is just sufficient to maintain the current level of activities. Whilst productivity and efficiency measures may release some resources that can be used towards additional services, there is a need for a new funding model that enables IAA activities to expand without detriment to the public purse.

The IAA will be discussing with Ministers and Home Office officials the case for a new funding model that enables it to expand its range of activities. Our strategy for ensuring a stable and robust financial basis for the organisation is a combination of the following:

- Releasing resources through efficiencies arising from modernising and automating business processes and reinvesting monies released in new staff, services, and activities. For example, we are in the process of implementing lean review recommendations and automating our application processes. With the introduction of online forms, combined, these will significantly reduce the manual processes previously involved, allowing us to consider restructuring specific functions in the business.
- In the longer term, the IAA will explore with Home Office officials and Ministers retaining fees and charges levied from advisers in line with other regulators, replacing the current practice of all fees being remitted to the Home Office. This change will require primary legislation.
- In conjunction with the above, agreeing with the Home Office a continuing but reduced level of GIA to enable the IAA to carry out the full range of activities this plan envisages, which fees income alone would not be able to sustain.
- Through changes in legislation, the IAA will be able to charge for support and services provided and retain any income so derived.

Transforming the IAA

The IAA of 2025 is a very different organisation from the OISC of three years ago, with regional operations teams, all staff home based, and all ICT infrastructure cloud based. However, much remains to develop the IAA into a high performing organisation that delivers the aspirations and goals of this Corporate Plan. Over the next three years there will be an ongoing programme of activities that will focus on:

- Building on the new brand identity reflecting our revised vision, mission, and values (as set out above) with an outward focused, proactive approach that develops the sector, enhances awareness and gives clarity to the advice seeker.
- Developing staff with the new skills and expertise needed to address the plan's aims and objectives, especially where these differ from historical activities.
- Improving and automating our processes utilising new ICT, artificial intelligence, and working with other organisations.
- Continuing development of the ICT infrastructure to support our modernised ways of working and interactions with immigration advisers, stakeholders, and those seeking advice.
- Improving the management of knowledge, information and data so the right information is available at the right time to take forward operations and in making longer-term decisions.

Annex A

Summary of aims and objectives

REGULATION: Ensuring compliance with established standards for registered immigration advisers.

As the IAA, we will build on the OISC's extensive experience of over 20 years in regulating immigration advisers in:

- Further improving standards of professional competence, and compliance with the Code of Standards by:
 - Extending the range and types of audits carried out and significantly increasing the number of organisations reviewed each year.
 - Streamlining the complaints process and introducing redress measures subject to new powers being introduced.
 - Developing new Codes and Standards year on year that moves the sector towards principle-based regulation.
- Bringing about best practice across the whole of UK by working with the legal bodies in Northern Ireland and Scotland to ensure effective supervision of professionals providing immigration advice and services.
- Achieving a more coordinated, uniform approach to the regulation of immigration advice, reducing the potential confusion for advice seekers, by working more closely with other regulators (SRA, BSB and Cilex).
- Developing proposals with the Home Office for the regulation of advice supplied via the internet and social media channels, and for advice emanating from abroad.
- Streamlining and simplifying the processes of registration, re-registration, and competence assessment.



DEVELOPMENT: Developing the immigration advice sector, working in partnership with advisers and stakeholders.

Immigration advisers are unusual in having no professional membership body that regulates entry or promotes Continuing Professional Development and growth of the sector generally. The nearest body is the Immigration Lawyers Practitioner Association (ILPA), a voluntary organisation that operates without a statutory basis. As the regulator, the IAA is already involved in this area through its competence assessment process, which assesses professional knowledge, and its registration process that assesses fitness to practice.

Currently, supply of advice and services does not meet the demand in both geographical areas and in the level of advice available. If the gatekeeping role of the sector is to be effective and strengthened in protecting the wider immigration system from consequences of illegal operators, and given the lack of any professional membership body, we need to extend our activities into developing the quality and availability of immigration advice by:

- Identifying the areas where supply and demand are not in balance and actively encouraging people to become advisers.
- Encouraging innovation within organisations that may provide for expansion in location or extent of services provided, and developing with advisers new ways of utilising technology to provide advice remotely and in places where provision is limited.
- Ensuring regulated advice is available in accommodation centres where the Home Office places migrants and asylum seekers by close working with Home Office operational staff identifying those locations where specialist advice is needed.
- Improving the information and advice to advice seekers on the IAA website to help them find the most appropriate adviser that meets their needs.
- Raising professionalism within registered advisers by:
 - Regular publication of guidance notes and advice on best practices and lessons learnt from audits and complaints.
 - Supporting Continuing Professional Development activities and development of peer-to-peer networks within each region.
 - Introducing an academic qualification as a prerequisite for registration.

ENFORCEMENT: Disrupting illegal advice-giving activities that undermine the integrity of the immigration system.

The occurrence threat and consequences of illegal activities by regulated and unregulated individuals has been identified. Overall, this area has been perceived within the Home Office as posing the biggest risk to the integrity of the immigration system, as well as causing major exploitation of vulnerable individuals.

Historically, criminal activities by non-registered individuals have far outweighed in scale numbers and impact, those by regulated advisers. We have been the only regulator that has actively pursued non-registered advice-giving criminals. Our emphasis has been to rely on complaints coming from individuals who have suffered because of illegal activities, with investigations focussed on pursuing criminal prosecutions. We have achieved a regular drumbeat of successful prosecutions with custodial sentences. However, we have been limited by a lack of powers under Acts such as the Regulation of Investigatory Powers Act 2000 (RIPA), or the Proceeds of Crime Act 2002 (POCA), or an ability to impose financial sanctions, some of which other regulators within the immigration advice sector do have. This has undoubtedly limited the degree to which we have been able to address this problem.

The IAA has reviewed its entire approach to enforcement and will significantly raise the profile and resources allocated. Over the next three years, we will seek the powers we need as a credible enforcement body. We will shift the emphasis from relying on complaints to a proactive approach of seeking out illegal activities. Our aim will be to disrupt any activity deemed to be illegal and we will continue with prosecutions where it is in the public interest.

- Regional Teams will adopt a proactive approach to gather information about potential illegal advice giving from local stakeholders and immigration advisers, as well as waiting for a formal complaint to be made.
- We will make it easier for anyone to report suspected illegal activities through QR codes and easy-to-complete forms available in multiple languages.
- We will develop a range of disruption approaches to match the scale and nature of the criminality of the offence with prosecutions being the ultimate action where appropriate.
- We will develop information sharing arrangements with bodies who have data and information that can indicate the possibility of illegal advice giving. This includes the Home Office and police.

**COMMUNICATION AND ENGAGEMENT:
Raising awareness and engaging with stakeholders to gather data and enhance joint working.**

As a small arm's length body of 64 people operating in a complex landscape, we need to work in partnership with others to achieve our aims across the sector. Good communications in getting messages out to stakeholders, and engagement activities to follow up and develop partnerships will be essential. These will require a much more proactive approach than has happened in the past.

Communications: Communications activities will inform stakeholders, raise awareness, and build confidence in the IAA and commitment to its aims. Much of the communications activity will be aimed at influencing and informing the advice seeker through the people closest to them (local community groups, families, and friends) and services they are most likely to use when first seeking advice (through online channels and digital platforms). We will achieve the following:

- Advice seekers will know how to access reliable advice and the risks and consequences of approaching unregistered advisers from a rolling programme of national and regional information campaigns targeted at migrants and their representative organisations.
- Public awareness of how to access quality advice and the risks of illegal advice giving will be raised through a regular drumbeat of articles, press releases, and media interviews.

- Individuals and organisations whose behaviour and actions are illegal or fall below the standards required will be named in publicly available material to inform the public and advice seekers.
- Immigration advisers will be informed about IAA plans and intentions through campaigns involving regular webinars and newsletters.

Engagement: Engagement involves reaching out to stakeholders to have dialogue and discussions in which feedback is received, messages are reinforced, joint working is enhanced, and data is acquired to help the IAA make more informed decisions.

- Key data and information will be acquired from stakeholders through a rolling three-year programme of regional and national engagement that enables the IAA to develop insights in key areas.
- Regional Teams will each have detailed regional engagement plans and an engagement capability to carry out engagements with stakeholders providing the data and reinforcing messages. Where possible, Regional Champions will be identified as a link between the IAA and our key stakeholders.
- Stakeholder views and comments on major policy issues will be established through formal consultations as required.
- Immigration advisers and stakeholders will give regular feedback to the IAA through a programme of online, regional, and national seminars.

TRANSFORMATION: Transforming the IAA into a high performing organisation.

Our agenda over the next few years will require a step change in the organisation's culture, the skills and resources we need, our ways of working, how we work with stakeholders, and developing the technical infrastructure needed to support all of this activity.

The priority now is to transform the organisation in a number of key areas:

High Performing Organisation: Putting in place culture, values, and behaviours that deliver the key parameters of being a high performing organisation, notably in:

- Staff engagement scores.
 - Ongoing productivity improvement.
 - Funding model: Explore establishing a robust financial basis for the future which can support the development of capacity and capabilities needed. This will potentially come about from moving the funding base from GIA to the fees and charges.
 - Powers: Acquire additional powers through RIPA, POCA, and the ability to make financial sanctions to strengthen the IAA's ability to enforce and ensure compliance.
- Knowledge, information, and data: Developing new data handling and management practices to enable addressing four key areas:
 - Identifying the advice seeker's generic needs and how the IAA as a regulator can meet these.
 - The extent of illegal advice-giving across UK, which can then inform allocation of resources.
 - The nature of immigration advisers activities and how these can be best developed.
 - Where and how the availability of immigration advice does not meet the demand.



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