

Annual Report

1 April 2024 to 31 March 2025





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September 2025

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Our role and vision

We provide a free, independent complaint review and investigation service to those who have exhausted the relevant Home Office complaints process and remain dissatisfied with the outcome.

Our role is twofold. Firstly, we adjudicate on the merits of escalated complaints that cannot be addressed to the complainant's satisfaction, and where appropriate we make case-specific recommendations for remedy.

Secondly (but not secondary), we provide feedback on the effectiveness of the Home Office's complaints process, and identify any wider systemic issues or learning which have the potential to impact on the service the Home Office provides to its customers.

We can examine complaints about:

- UK Visas and Immigration (UKVI)
- Immigration Enforcement (IE)
- Border Force (BF)
- Detention Service (DS)
- HM Passport Office (HMPO)
- General Register Office (GRO)

We look at complaints of maladministration (service failure) such as:

- delay
- error
- failure to follow the correct procedures
- poor service
- incorrect or misleading advice
- minor misconduct complaints from the public about staff (as defined by the Home Office)

We cannot look at complaints:

- about decisions that carry review or appeal rights
- concerning policy or legislation
- that are being, or have been, investigated by the Parliamentary and Health Service Ombudsman
- about the Home Office as an employer
- that are, or have been, the subject of judicial review or other court proceedings
- which fall under the remit of the Windrush Compensation Scheme
- from the public about serious staff misconduct (as defined by the Home Office)

Our vision is to provide a first-rate service, delivering case-specific solutions to unremedied service failure and actionable insights to drive service improvements.

Introduction

This has been our busiest year yet. We became operational in October 2022, so last year's report (2023 to 2024) was our first **full** reporting year. This 2024 to 2025 reporting year is the first in which we can make a year-on-year comparison, although it is too early to see any trends, and we simply do not know whether the upward trajectory will continue, plateau or decline.

Growing volumes

We received more complaints this reporting year than in the previous one, and the number of cases we accepted for examination increased too, as did the cases we were able to process to conclusion. As a small, demand-led service, we cannot control workflows, so any increase is inevitably challenging and places a significant pressure on all of us. The Independent Examiner of Complaints (IEC) team, ably led by Head of Office Kathy Hoerty, and supported by Alan Billington and Matt Smith, has risen to the challenge and I am enormously grateful to every member of IEC staff for their commitment and hard work.

We managed these increasing volumes by sharpening our focus on resolving complaints to the customer's satisfaction **before** (and in a bid to avert) a time-consuming investigation and review, where we could get customers an acceptable outcome faster, and using fewer resources. We have also been previewing cases awaiting investigation to see if the need for the complaint has been removed, and taking such complaints out of the queue. While this is in itself

a time-consuming process, it can help avoid unnecessary investigation.

Filling vacancies has also helped us manage a growing workload, and during the year we had a full staff complement for the first time – although recruiting and training new staff when the small team is already so stretched adds a significant pressure too. It has been worth it, as the new staff are already productive members of the team.

Systemic issues

In addition to providing an important complaint resolution and investigation service to customers who remain dissatisfied with the outcome of their complaint, our value to the Home Office is in the insights we offer from our case investigations. When there is a potential systemic issue or wider organisational learning, I send the Home Office an IEC letter. It might simply highlight easily remedied concerns about the clarity or completeness of staff guidance, or a lack of (or potentially confusing) advice to service users. Or it might raise more fundamental issues around how the original policy intent has been translated into operational instructions for staff.

Our service has its origins in a recommendation from Wendy Williams' Windrush Lessons Learned Review, and while the Home Office should be congratulated on accepting the recommendation and funding the IEC service, it is disappointing that sometimes the insights we provide appear not to have been considered. There has been a consistent failure from the outset to respond within a reasonable timescale. I reminded directors general in January 2025 that I would report here on the number of outstanding responses. This led to a flurry of last-minute year-end (and sometimes inadequately considered or incomplete) replies.

My expectation is that the relevant Home Office business area should consider the IEC letter and respond in good time (with an interim or 'in principle' response in the meantime, if necessary) stating whether the issue raised is accepted and will be acted upon, or outlining the rationale for not accepting it. Too frequently, lengthy, frustrating, repetitive and time-consuming exchanges are necessary before the relevant business area accepts the validity of our point and agrees to give it further consideration, or to take action. We do not have the significant resources that the Home Office has, and exchanges of this nature divert our limited, over-stretched resources from dealing with complaints. More significantly, they may indicate that observations and outcomes from independent complaint reviews are not always valued or understood.

For example, when I suggested a small but necessary clarification to HMPO guidance on applying for a child's first passport, it was rejected. Only extensive, repetitive correspondence got it accepted. By way of background, a parent applying for a first passport for their child must

send HMPO their own passport **details** (number and name on the passport). The guidance could have been clearer. As a result, some parents unnecessarily sent their passport, and in some cases, HMPO lost or damaged them, or delayed their return, leading to complaints. A simple change of wording could avert this, hence my IEC letter.

HMPO's rejection stated that GOV.UK was clear, and it was not appropriate to make changes on the back of one case. My office often highlights wider issues identified from a single complaint, but in this case, we had seen others too. Over prolonged correspondence we explained that whether HMPO **believed** the guidance was clear, it evidently was not: no one would go to the trouble and inconvenience of sending away an important document if there was absolutely no need. We explained that many adults in the UK have poor literacy, and the guidance was potentially unclear even to those who did not – as although HMPO asked for passport **details**, they listed this requirement under a heading that contained the word **document**, in a sentence that with the exception of the passport number, listed only **documents**. It is therefore unsurprising that some applicants sent their passport **document** (rather than **details**) along with the documents they needed to submit. HMPO eventually agreed to highlight that the passport itself should not be sent.

Similarly, following an investigation into a BF complaint, in which the complainant's MP prematurely referred their complaint to the Parliamentary and Health Service Ombudsman, I wrote to suggest looking at what information, advice or guidance could be shared with MPs to help them divert appropriate complaints into the Home Office complaints system at an earlier stage.

In response the Home Office Customer Service Group, which plays a central role in delivering frontline services to the public, with responsibilities that span operational delivery, complaints handling, and ethical governance, rejected the suggestion. They said, among other things, that a welcome pack was provided to MPs at appropriate intervals, containing relevant information to aid MPs in representing their constituents on immigration and passport matters. They told us the pack advises that constituents should attempt to get information themselves from other sources before approaching their MP, such as complaining directly to the Home Office, and that it contained relevant contact details for complaints teams and a weblink to further information about the complaints procedure.

Having asked to see the pack, we found it did not include information about the complaint escalation process or the role of my office. Following further representations, the Customer Service Group agreed to update the pack to include information on the complaint escalation route.

Both HMPO and UKVI have, at times, had an almost knee-jerk reaction to defend the **status quo** rather than consider with an open mind that there may be a better way, and that our external perspective can help avert complaints and save both customers and the Home Office time, money and frustration. As I often say in my meetings with senior officials, while I am independent of the Home Office, we are all on the same side in wanting the very best public services within the constraints of tight budgets. Simple suggestions of the type we make can help bring this about in a small but meaningful way.

Complaints handling

However, it has not all been negative. There has been greater co-operation in accepting and implementing my recommendations for redress. Back in 2022, the concept of an independent complaints examiner was new to the Home Office, and from the outset we experienced pushback on my recommendations. This year we are finally seeing evidence of a greater understanding that it is for **me** to adjudicate on the merits of escalated complaints. It is good to see progress, although it is not universal.

UKVI can take far too long to accept my recommendations for redress, which in turn delays issue of the investigation report and closure of the complaint with this office. It is not helpful to be told by a business area that has already had two opportunities to address the issues what my **independent** adjudication should be, or instructed to substitute my recommended consolatory payment with a lower amount (or to recommend no payment at all).

Ultimately, our aim is to see Home Office complaint handling improve, thereby averting the need for complainants to have to escalate their complaint to this office. Timely and appropriate remedies in response to Home Office service failures ought to be available by stage 2 of the process as a minimum, and preferably at stage 1. My office should only see complex and intractable cases. Current trends in the volume of referrals and the number of cases we have been able to resolve without the need for investigation suggests there is work to be done before this objective can be realised.

Once more this year I visited various parts of the Home Office to better understand what happens on the ground, and to gain an insight to help inform my work – such as going to see asylum accommodation following a number of complaints. I am grateful to the Home Office for hosting such visits. I also met with the Information Commissioner's Office and the National Audit Office (in connection with its work on Home Office complaints), and attended the Ombudsman Association annual conference in Bristol.

We ended the reporting year giving thought to how we might be impacted by the Cabinet Office review of the Home Office's (and other government departments') arm's length bodies and entities. We were pleased to see the Home Office's focus will be, in part, on reducing costs through better use of technology. It is clear that a bespoke complaint recording solution could help produce efficiency savings, and although we were promised one from the outset, it is disappointing to see no progress. It remains a priority for us as we move into a new reporting year.

We also hope to explore potential opportunities for using artificial intelligence to support the progression of cases. In the current climate, it is unlikely that the Home Office will develop an activity-based funding model for the IEC service, so the importance of having the right complaint recording solution and exploring the opportunities to use artificial intelligence to support our work become ever more pressing.

I am grateful to the Minister for Migration and Citizenship, Seema Malhotra, for her genuine interest in the work of my office. And I am, of course, grateful to the complainants who took the time and trouble to provide feedback about our service, examples of which can be found throughout this report. We will not rest on our laurels though, and are committed to providing an ever-improving service, albeit within a challenging budgetary period.



Moi Ali
Independent Examiner of Complaints

Key facts and figures for 2024 to 2025



5,392 complaints were received.



1,106 complaints were accepted for examination.



802 complaints were closed or completed, of which:



212 were withdrawn



209 were resolved without the need for an investigation



89 were settled following a review of the evidence



292 IEC reports were issued



We secured refunds and financial redress for complainants amounting to **£124,781**.



We had **849** live cases at the end of March 2025.



We sent **86** IEC letters, two of which concerned corporate matters in respect of complaint handling.

Our process: finding a way through

What can we accept for examination?

When we receive a complaint, we must ensure that the subject is one we can look at, and that the complainant has had a final response from the relevant business area within the Home Office ('the business').

Of the 5,392 complaints we received during the reporting year, we accepted 1,106. We were unable to accept the remaining 4,286 for examination, because:

- 3,880 (90.5%) had yet to receive a final response to their complaint from the relevant business area
- 406 (4.5%) were outside our jurisdiction

Where the complainant has received a final complaint response, we agree the scope of our examination in discussion with the complainant. Once we have done this, the complaint is accepted for examination.



Resolution: putting it right

Having accepted the complaint, we consider, in discussion with the relevant business area and the complainant, whether the complaint can be resolved without having to request the case records.

If we can agree actions that satisfy the complainant that their concerns have been addressed, this generally represents the quickest outcome.

We resolved 209 complaints during the reporting year. The table below shows that the businesses agreed a range of actions to resolve complaints (in some cases more than one resolution action per case), the most common being to rectify errors or complete outstanding actions, and the reimbursement of Home Office fees or charges.

Resolution actions:



“ Thank you so much for your help and support,
really appreciate everything you’ve done.

”

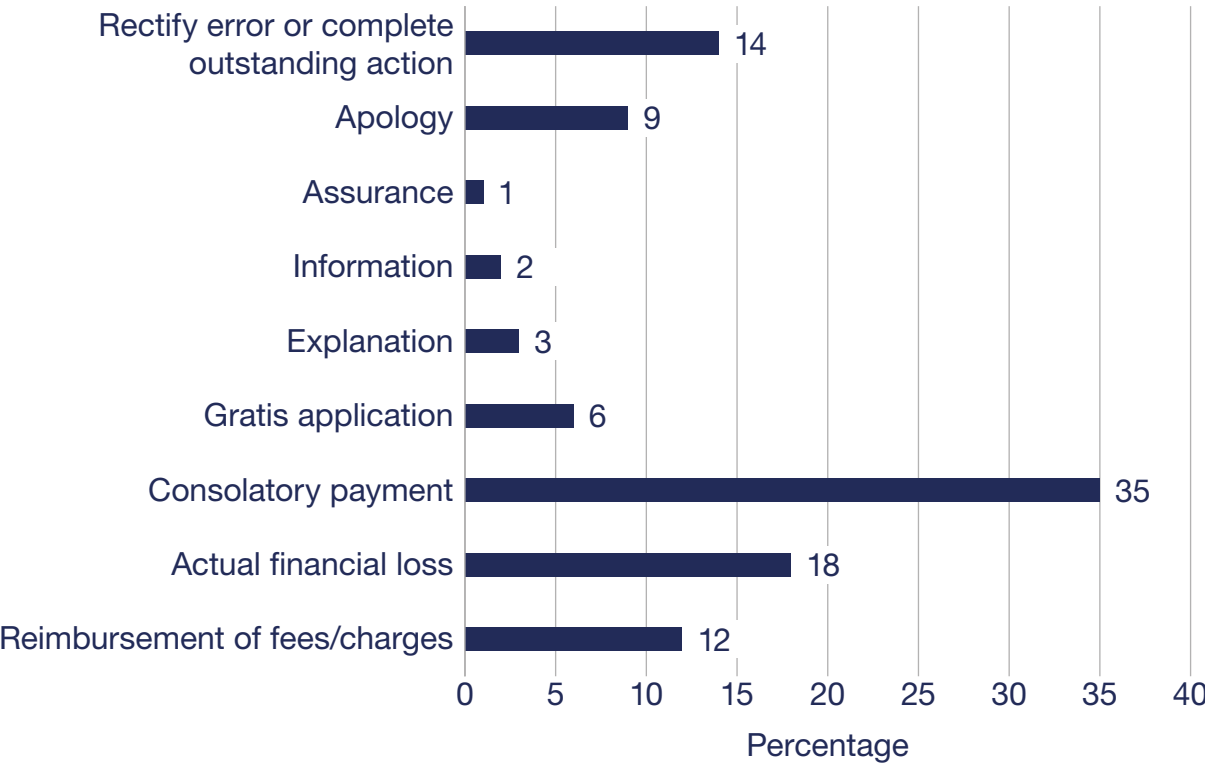
Investigation: settling a case

If we cannot resolve the complaint at this early stage, we request the case records from the relevant business area. Once case records are received, the complaint is allocated to the next available investigator for examination.

Having examined the evidence, the investigator may ask the business to take action to address any unremedied service failures. If the business agrees, and the complainant is satisfied that their concerns have been settled, the case is closed.

We settled 89 complaints during the reporting period. The bar chart below shows that businesses agreed a range of actions to settle this group of complaints (in some cases more than one settlement action per case), the most common being a consolatory payment and the reimbursement of actual financial costs or losses.

Settlement actions:



“ I want to extend my heartfelt thanks to you for your invaluable assistance in resolving this situation. Your support and effort have been instrumental in achieving this positive outcome. Thank you once again for your help. ”

IEC reports: the final phase

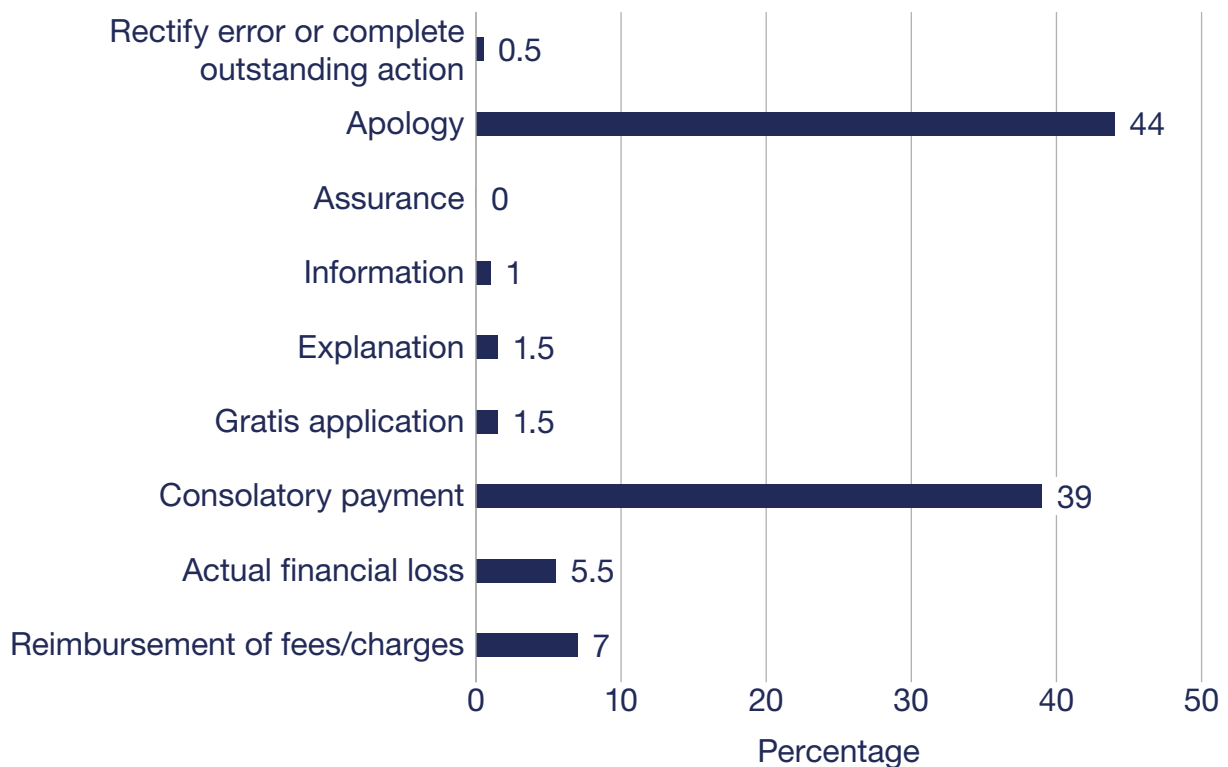
If the complaint cannot be settled, the IEC will reach a finding on the merits of the complaint and, if appropriate, make recommendations for redress.

We concluded 292 IEC investigation reports during the reporting period. In five of those cases we were unable to reach a finding. Of the remaining 287:

- 93 (32.4%) were upheld
- 87 (30.3%) were partially upheld
- 107 (37.3%) were not upheld

The bar chart below summarises the range of IEC recommendations to remedy fully or partially upheld cases (in some cases, multiple recommendations were made). The most common remedies were an apology and a consolatory payment.

IEC recommendations:



“ I just want to say thank you for dealing with this for me. I have found you to be understanding and kind in your actions and words. I am left in no doubt you understood where I was coming from and put yourself in my shoes. ”

Our live caseload

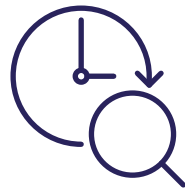
At the end of the reporting period we had 849 live cases, at various stages of our process, as detailed below:

**33**agreeing scope
of investigation**38**

potential resolutions

**39**

awaiting evidence

**583**awaiting
investigation**156**

live investigations

Opportunities for service improvement

Where our work highlights a wider systemic issue or learning opportunity, the IEC will write to senior officials within the Home Office documenting her observations and inviting comment on the potential for improvement.

86 such letters were sent during the reporting period.

Further information can be found in the business-specific areas of this report.



Performance

Service-level agreements (SLAs) for the exchange of information

We have a range of SLAs with business areas for the exchange of information to inform our examination of individual complaints. An overview of performance against the SLAs is detailed below. We received:

- 555 business responses to resolution proposals, of which 427 (77%) were within the agreed SLA
- 733 business area responses to evidence requests, 574 (78%) of which were provided within the agreed SLA
- 374 business area responses to case history checks, 246 (66%) of which were provided within the agreed SLA
- 125 business responses to settlement proposals, 91 (73%) of which were provided within the agreed SLA
- 288 business responses to IEC reports which were shared to review factual accuracy and agree to action any recommendations for redress, 212 (74%) of which met the agreed SLA

We have referred to how each business area performed against the SLAs in the business-specific sections of this report. The SLAs are reviewed annually, in discussion with business areas, to ensure they are achievable and support the delivery of our service standards.

UK Visas and Immigration (UKVI)

UKVI is responsible for deciding who has the right to visit, study, work and stay in the United Kingdom.

Complaints activity:



2,568 complaints received

653 complaints accepted for examination

416 cases closed, of which:

- **151** withdrawn
- **143** resolved
- **34** settled
- **88** IEC reports, of which:
 - **34** not upheld
 - **21** partially upheld
 - **33** upheld

SLA performance:



There were delays in receiving responses from UKVI across all areas of the SLA. Of greatest concern were the delays in responding to IEC reports: only **28%** of responses were provided within the agreed SLA. These delays impacted on our clearance times – in other words, we did not always meet our own targets **not** as a result of any shortcomings by the IEC office, but simply because UKVI failed to meet its targets for responding to us.

Most common complaint categories:



We record details of the subject of the complaint at case closure. In the case of UKVI the most common complaint categories were delay, failure to provide financial redress and error.

Financial redress:



UKVI paid financial redress to IEC complainants amounting to **£74,179**, comprising:

- **£12,477** consolatory payments
- **£57,673** reimbursement of fees or charges
- **£4,029** actual financial loss

IEC letters:



We sent **29** letters, of which **25** had been responded to either with a full or holding response by the end of the reporting period.

Observations

We have seen a significant amount of variety in the UKVI complaints we have examined, and this is reflected in the case examples we have included.

We welcome the high degree of engagement by UKVI in attempting to resolve or settle the complaints we accepted for examination, since this generally offers the quickest outcome for the complainant and avoids the need for what may prove to be a lengthy investigation. Nevertheless, it should not be necessary for complainants to have to refer their concerns to this office before proper consideration is given by UKVI to providing full and appropriate redress, in response to their own service failures.

Of greater concern is the time taken in some cases to agree any recommendations for redress and the timescale for implementation. This is action which needs to be completed before we can share the investigation report with the complainant. Such delays by UKVI impacted negatively on our small team, causing us to have to regularly escalate outstanding responses and adversely affecting our ability to conclude some investigations within our 70-working-day (14-week) target. UKVI needs to improve its turnaround times and start meeting its agreed SLAs with us.

During the reporting year, UKVI has strengthened its arrangements for managing and responding to IEC letters, highlighting potential opportunities for service improvements. This is welcome, but we have yet to reach the point where responses are consistently provided on time and to a high standard.

Resolution

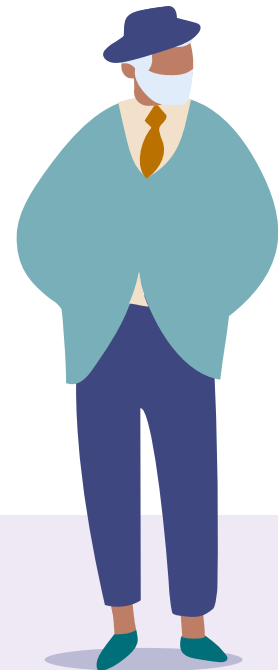
Mr A applied for British citizenship but had not received a decision after 22 months. Despite raising a complaint and receiving responses, he was not given any meaningful updates or solutions, which he felt reflected poor service. When he escalated his complaint to our office, he had still not received a decision. In response to the complaint, UKVI told us Mr A's application had been approved and agreed to issue a consolatory payment. They also committed to writing to Mr A to explain the delay and set out their ongoing efforts to improve service. Mr A accepted this resolution and was happy that this resolved his complaint.

Resolution

Mr B applied for four two-year visas: one for himself, and three for family members. His family's initial applications were refused. Although a second round of applications was successful, the visas were issued with inconsistent durations: Mr B received a two-year visa, while the other three applicants were granted six-month visas. To resolve the matter, UKVI agreed to reimburse Mr B for the three refused visa applications. Mr B was satisfied this resolved his complaint.

Settlement

Mr C's son was born abroad, after Mr C had naturalised as British. He applied for his son to be registered as a British citizen, providing his British passport and his son's birth certificate. UKVI refused the application, stating that Mr C's son did not qualify as a British citizen. After researching this, Mr C complained, saying that by virtue of his status, his son was already a British citizen. Mr C said UKVI should have rejected and refunded the application. UKVI did not uphold his complaint, saying the application had been processed and the application fee could not be refunded. To settle the complaint, we asked UKVI to reconsider their decision, noting that they had applied the wrong legislation in refusing the application, rather than recognising that Mr C's son was automatically a British citizen. UKVI acknowledged their error and agreed to refund the application fee (£1,012) and apologise for not identifying Mr C's son as a British citizen. Mr C was satisfied that this settled his complaint.



“ This issue was finally resolved with your assistance, for which I am deeply grateful. Thank you very much for your help and understanding. ”

IEC report

Mr D applied for indefinite leave to remain (ILR) as the dependent partner of a skilled worker. He paid £500 for the priority service (PV), which guarantees a decision within five days if no additional information is needed. UKVI guidance says a dependent can only apply for ILR once their sponsor has applied for, or been granted, ILR. At the time of Mr D's application, his sponsor had yet to apply.

Two days before enrolling his biometrics, Mr D informed UKVI that he needed to travel to see a sick relative but could not do so with a pending application. UKVI responded five days later, explaining that they could not meet the PV timeframe, as they needed more information from him, and that he must wait until his sponsor applied. They outlined his options, including waiting for his sponsor to apply for ILR. UKVI did not say that Mr D's application was removed from the PV service standard. When Mr D replied, his sponsor had applied for ILR, and he asked for both applications to be considered together.

The sponsor's application was processed promptly, but Mr D's took a further month, despite his PV payment and his stated need for urgent travel. UKVI explained that the PV service was not guaranteed, but could not explain what should happen with applications removed from the PV service standard, once UKVI has sufficient information to make a decision.

The IEC upheld Mr D's complaint that there had been delays in processing his application and recommended an apology and a refund of the PV fee. The IEC also sent a systemic letter to UKVI about the lack of guidance on how to administer PV applications once they have been removed from the service standard. In response, UKVI agreed to issue internal instructions to staff on prioritising applications and to publish information on GOV.UK about how such applications would be handled.

IEC report

Mr E, an asylum seeker in Clearsprings accommodation, complained in March 2022 about anti-social behaviour, including noise, unauthorised visitors, and drug and alcohol use. He stated that he was assaulted in June 2022 by a resident's guest, while awaiting a response to his complaint. This was reported to Clearsprings, who sent a housing officer to assess the situation. Mr E then reported the incident in a complaint, but did not receive a response for over a month.

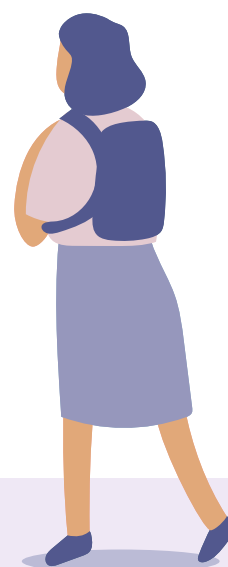
In August 2022, UKVI arranged for Mr E to be moved but did not consult him first. When he was informed, Mr E told Clearsprings he did not wish to move, saying that the disruptive residents should be moved. Despite continuing to report anti-social behaviour throughout September, Mr E did not receive a further response until December 2022 – which said only that Clearsprings had reminded residents of the house rules. It did not explain what had been done to investigate Mr E's ongoing concerns, why relocation had been considered appropriate, or what further steps would be taken.

Mr E escalated his complaint, and in April 2023 he received a response stating that no further incidents had been identified. However, evidence showed that incidents had been logged between January and April 2023, as well as during the IEC's investigation.

The IEC upheld Mr E's complaint, identifying delays and inadequacies in the complaint responses, and a lack of thorough investigation and resolution. She recommended that UKVI apologise for these service failings, provide Mr E with an update on the actions being taken to address the issues he had raised, and make a consolatory payment in recognition of the poor service.

“Your office's meticulous and impartial review transformed despair into opportunity.”

”



IEC report

Ms F applied for a student visa in July 2021 and paid the Immigration Health Surcharge (IHS) for the period of September 2021 to October 2023. After changing her study course, she needed to return to India and apply for a new visa. She did so in December 2021, paying the IHS for the period of December 2021 to October 2024. Ms F complained that UKVI had declined her request for an IHS refund for the overlapping period.

The IEC found that, according to UKVI guidance, IHS refunds can be issued for overlapping periods only when an applicant extends or switches their visa from **within** the UK – but not if they leave the UK before their visa ends. Additionally, students must meet academic progression requirements to change or extend their visa in the UK, criteria which Ms F did not meet (which is why she was required to return to her home country to apply for a new visa).

UKVI had correctly applied its policy in refusing the refund, so the IEC did not uphold this part of the complaint. While recognising that policy is a matter for the Home Office, the IEC did write to UKVI asking if it was the policy **intention** to deny a refund where a student is required to return home and reapply for an alternative course at the same institution, covering a largely similar study period. At the end of the reporting year, UKVI had yet to respond.



Border Force (BF)

BF is a law-enforcement command within the Home Office, responsible for frontline border control operations at air, sea and rail ports in the United Kingdom.

Complaints activity:



132 complaints received

90 complaints accepted for examination

70 cases closed, of which:

- **7** withdrawn
- **0** resolved
- **2** settled
- **61** IEC reports, of which:
 - **2** unable to reach a finding
 - **42** not upheld
 - **14** partially upheld
 - **3** upheld

SLA performance:



BF performed well across all areas of the SLA, in most instances outperforming other business areas.

Most common complaint categories:



The most common cause of complaint concerned a lack of information, usually about why e-gates have failed to work, followed by complaints about staff behaviour.

Financial redress:



BF paid financial redress to IEC complainants amounting to **£2,162**, comprising:

- **£925** consolatory payments
- **£82** reimbursement of fees or charges
- **£1,155** actual financial loss

IEC letters:



We sent **12** letters, of which **9** had been responded to either with a full or holding response by the end of the reporting period.

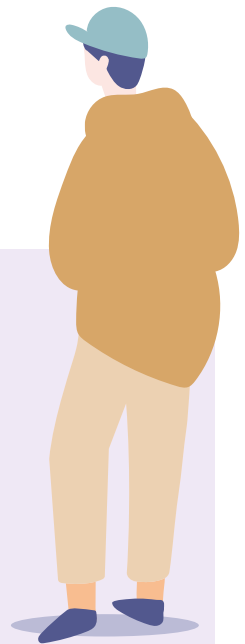
Observations

It is pleasing to note that the BF complaints that escalate to this office continue to offer little if no opportunity for resolution or settlement. This, coupled with the low numbers of complaints escalating to this office, provides a degree of assurance in respect of the rigour applied to BF complaint handling, which is not always apparent in other business areas.

A high proportion of the BF complaints we continue to accept for examination concern problems associated with the use of e-gates, reflecting passengers' frustration at being unable to use e-gates and their desire to understand why. However, from the cases we have examined, we can see that BF has implemented our recommendations around improving the content of complaint responses, to try and make them as informative as possible within the constraints that result from its primary focus of maintaining the security of the border of the UK. We accept that this means that BF cannot reveal why an individual is unable to use the e-gates, but that service aspects of such complaints, for example delays or the attitude of staff can be addressed.

Although complaints about the use of e-gates are the main complaint type escalated to this office, we see a wide range of other issues too, which have given rise to IEC service improvement letters.

“Thank you for a very comprehensive report (which is impressive) but unfortunately does not get to the resolution or answers as to why I can no longer use e-gates, but at least I understand more about the process applied to my complaint. Not sure what I can expect now and remain quite frustrated with the situation but thanks again for the report.”



Settlement

Mr G had his 1977 Lambretta motor scooter transported by van from Spain to the UK, where BF asked the driver to empty the van for a search. During the search, a BF dog jumped onto the scooter and scratched the paintwork. Mr G provided photographic evidence and an estimated repair cost. BF initially rejected his submission, as it did not have an official letterhead. To settle this complaint, we asked BF to review the evidence again and reimburse the repair costs. BF agreed to reimburse the repair costs of £465 and make a consolatory payment. Mr G was happy that this settled his complaint.

IEC report

Mr H was stopped at Calais on his return to the UK. He said that two BF officers were confrontational and aggressive, and refused to provide their officer numbers when asked.

The IEC found that the officers were seasonal workers who did not have officer numbers to give, and so had provided Mr H with their names (although they did have unique immigration stamp numbers). In the absence of CCTV footage or independent evidence beyond written statements, the IEC could not know how the officers had behaved. However, she found that BF's records showed that they had given inconsistent explanations for their requests and questioning of Mr H. Therefore, the IEC upheld the complaint overall, and recommended that BF apologise for their inconsistent responses.

The IEC sent a letter to BF, highlighting that there was no guidance on how seasonal workers should identify themselves when asked by passengers. In response, BF agreed to issue internal guidance instructing seasonal workers to provide their unique immigration stamp numbers, rather than their names, when identification was requested.

IEC report

Mr J was stopped at the Dover border for a vehicle search. He complained that officers handled the search roughly, throwing his belongings and causing damage. He said one officer distracted him by talking, but did not answer his questions. Mr J believed the search was racially motivated and complained that an officer photographed his passport using a mobile phone, without explanation. He suggested this may be a potential data breach.

The officers' accounts conflicted with Mr J's, and in the absence of additional evidence such as CCTV footage, the IEC was unable to reach a finding on whether the search caused damage. As BF has legislative powers to search passengers and examine travel documents, it was not possible to determine whether there was a racial motivation.

However, the IEC found no guidance on photographing documents. The officer said he had photographed the passport using a departmental mobile phone, to expedite checks, and deleted the image once the checks were complete. The IEC acknowledged Mr J's concerns but did not uphold this part of the complaint, as the officers were empowered to examine his passport and undertake any necessary checks. However, the IEC sent a letter to BF about the lack of guidance on photographing documents without explanation or consent. At the end of the reporting year, BF had yet to respond.

Immigration Enforcement (IE)

IE is the operational arm of the Home Office responsible for reducing illegal immigration and the harm it causes.

Complaints activity:



- 7 complaints received
- 4 complaints accepted for examination
- 2 cases closed, of which:
 - 1 withdrawn
 - 1 IEC report (upheld)

Most common complaint categories:



The single investigation report we closed concerned staff misconduct.

Financial redress:



IE made a single consolatory payment of **£100**.

IEC letters:



We sent **one** letter, in response to which we have received a holding response pending implementation of the agreed actions.

Observations

Since my last report, IE has revised the information available on GOV.UK to provide greater clarity about the complaint escalation process and has taken ownership of managing and responding to their own complaints – a task that was previously managed by UKVI.

The volume of IE referrals to this office remains surprisingly low given the difficult and sensitive nature of its work, and the potential impacts on individuals if there is a service failure. Nevertheless, the single complaint we investigated this year prompted the IEC to write to IE to highlight opportunities for service improvements, as described in the example below.

IEC report

Mr K contacted the Voluntary Returns Service (VRS) to arrange his voluntary departure from the UK. He stated that during a call, he was told he would receive the 'reintegration package', a financial package of up to £3,000 to help individuals resettle in their home country. Having paid for his own flights, he was informed he was no longer eligible for the package.

The IEC reviewed the call and found that when Mr K was asked whether the Home Office should pay for his travel, he replied, "I don't mind, either me or the Home Office pay for the tickets." There was no requirement or instruction for the VRS agent to clarify whether Mr J was **able** to pay, before incorrectly confirming his eligibility for the reintegration package. The IEC concluded that although the VRS acted in accordance with guidance, in later withdrawing the offer of the reintegration package (as Mr K had demonstrated the means to fund his own travel), she understood why he felt misled. She upheld Mr K's complaint and recommended an apology and consolatory payment.

The IEC also sent a letter to IE, recommending that direction to VRS call handlers be amended to require a clear 'yes' or 'no' response to the question of the ability to pay for travel. In their response, IE did not specifically address this point. They referred to Mr K's experience as an isolated case, saying they had since established an in-house training team, updated GOV.UK guidance on eligibility, reminded staff of the correct procedures, and regularly reviewed customer calls as part of quality assurance measures. In response, the IEC asked them to address the original point but a response to that remained outstanding at the end of the reporting year.

Detention Service (DS)

DS is responsible for the management of a network of immigration removal centres.

Complaints activity:



23 complaints received

17 complaints accepted for examination

3 cases closed, of which:

- **1** withdrawn
- **1** resolved
- **1** IEC report (upheld)

Most common complaint categories:



In the **two** cases we cleared, **one** concerned process and the other concerned the loss, damage or destruction of property.

Financial redress:



DS paid financial redress to IEC complainants, via the contracted service provider, amounting to **£150** of consolatory payments.

IEC letters:



We sent **one** letter, in response to which we received a holding response pending implementation of the agreed actions.

Observations

The DS complaint escalation process differs from other Home Office business areas. Once the IEC process has been concluded, DS complainants are signposted to the Prisons and Probation Service Ombudsman, who in turn will signpost to the Parliamentary and Health Service Ombudsman at the end of their process. This provides for an unusually lengthy complaint escalation process for this group of complainants.

Resolution

Ms L, an asylum seeker staying in an immigration removal centre, complained after discovering that staff had mistakenly disposed of some of her personal belongings. Some items were subsequently returned to her in poor condition, and a pair of trainers could not be found. To resolve the case, our office proposed that DS reimburse Ms L for the trainers, which they acknowledged had been mistakenly discarded by a housekeeper. Although DS did not accept Ms L's stated value of the trainers due to a lack of evidence, they recognised the distress caused and the sentimental value of the lost item. As a result, they offered a consolatory payment of £50. Ms L accepted this offer and was happy that this resolved her complaint.

IEC report

Mr M, an asylum seeker, was placed in isolation under Rule 40 ('removal from association'), following a protest within the immigration removal centre. He said he was not given paperwork explaining why he had been isolated or why this isolation was extended beyond 48 hours. Such paperwork is required under DS guidance.

The IEC found that Mr M was given a general Rule 40 order, which described the protest but not his specific role, or the reason for his removal. There was also no evidence that he received paperwork justifying the extension of his isolation beyond 48 hours. While DS apologised for the latter, they failed to acknowledge the former. The IEC upheld Mr M's complaint and recommended an apology, a consolatory payment, and a reminder to staff of the importance of following Rule 40 procedures, including issuing proper documentation.

The IEC also sent a letter to DS, highlighting concerns about the use of a single order as justification for the collective removal of all parties linked to a protest, without specifying the resident's individual involvement or the reasons for their removal. DS responded, agreeing with the IEC's assessment and confirmed that they would revise the published guidance to clarify the expectations in this regard.

“Your professionalism and empathy reaffirmed my love for the UK and its institutions.

”

HM Passport Office (HMPO)

HMPO is responsible for providing passports for British nationals worldwide.

Complaints activity:



2,169 complaints received

332 complaints accepted for examination

310 cases closed, of which:

- **52** withdrawn
- **65** resolved
- **53** settled
- **140** IEC reports, of which we were unable to reach a finding in **3** cases. Of the remaining **137**:
 - **31** not upheld
 - **51** partially upheld
 - **55** upheld

Most common complaint categories:



The most common causes of complaint were error, delay and the loss, damage or destruction of documents.

Financial redress:



HMPO paid financial redress to IEC complainants amounting to **£48,137**, comprising:

- **£15,445** consolatory payments
- **£6,433** reimbursement of fees or charges
- **£26,259** actual financial loss

IEC letters:



We sent **40** letters, of which **21** had been responded to either with a full or holding response by the end of the reporting period.

Observations

We continue to resolve or settle a high proportion of the HMPO complaints accepted for examination. While we welcome HMPO's willingness to work with us to do so, given this generally represents the quickest outcome for the complainant, it is disappointing that complaints have to escalate to this office before the complainant is offered full and appropriate remedy for HMPO's service failures.

For those complaints that required a full investigation, HMPO has consistently provided timely responses to IEC recommendations for redress, and we welcome the fact that it has rarely been necessary to escalate an outstanding response or action.

Many of the HMPO complaints we examined during the reporting year concerned delays or errors which were considered to have resulted in the complainant experiencing a financial injustice. However, we also saw complaints that had their origins in HMPO policy, which had not been set out sufficiently clearly for customers to understand or staff to apply.

SLA performance

HMPO performed well in all areas of the SLA, exceeding all the in-target response rates referenced earlier in the report.

Resolution

Ms N submitted passport applications for her family and paid for secure delivery to ensure the safe return of her documents. She received her documents back, with the exception of her son's adoption certificate – which was returned using standard, untracked post and went missing. Ms N found this unacceptable, having paid for secure delivery, and raised a complaint. To resolve this matter, HMPO agreed to issue a consolatory payment, and either replace the adoption certificate or reimburse the cost of obtaining a new one. Ms N was satisfied this resolved her complaint.

Resolution

Ms O complained after she received a passport which contained a printing error. HMPO advised her to return the passport, and they would reimburse the delivery cost. Ms O returned the passport using international delivery, which cost £50. However, HMPO initially reimbursed only £7.35, without explaining how this amount was calculated. To resolve the matter, HMPO agreed to reimburse the actual cost Ms O had incurred to return the passport, and she was content this resolved her complaint.

“ I just wanted to pass on my sincere thanks to you again. This has been a stressful procedure to go through and my experience is nothing compared to many people I’m sure. The passport office have been consistently poor in their service and inaccessibility. However, from the moment you have been involved, I have felt looked after and have been dealt with in a highly professional manner.

”



Settlement

Ms P applied for her first British passport, submitting supporting documents including her Irish passport. The standard application processing time was 10 weeks. HMPO took six weeks to check the supporting documents before submitting them for examination, and subsequently lost them. Ms P was required to replace the documents before HMPO could process her application. The processing delays caused by HMPO’s loss of the supporting documents resulted in Ms P missing a planned holiday. To settle the complaint, we asked HMPO to apologise and reimburse the cost of the missed holiday. HMPO agreed and reimbursed £2,758.52. Ms P was happy that this resolved her complaint.

Settlement

Ms Q complained that HMPO attempted to call her late one evening to inform her they had mistakenly cancelled her passport. As she missed the call and received no follow-up, she remained unaware of the cancellation until she attempted to use her passport at French immigration and was told it had been reported lost or stolen. Ms Q also complained about HMPO’s poor and inconsistent communication when trying to resolve the matter. To settle the complaint, we asked HMPO to apologise, reimburse the costs incurred for replacing her passport through the fast-track service (including fees, travel and loss of earnings), and offer a consolatory payment. HMPO agreed, reimbursing £94.21 and making a consolatory payment.

IEC report

Ms R submitted a first-time child passport application for her son in January 2023. She submitted a statutory declaration stating that she did not wish to register her son's birth. HMPO accepted the statutory declaration but requested further evidence, including a General Register Office (GRO) 'no trace letter' confirming that her son's birth was not registered.

Ms R provided other evidence to prove her son's birth was not registered, but HMPO continued to request a GRO no trace letter, as per the guidance in place at the time. However, Ms R continued to challenge the need for the GRO letter, in response to which HMPO sought clarification from their policy team in July 2023. The policy team responded in August 2023, advising that from 30 June 2023, GRO only issued no trace letters for individuals aged 16 or older. Following receipt of this clarification, the passport was issued.

The IEC found that HMPO's guidance was not updated following the GRO's 'no trace letter' update, and upheld the complaint, as the delayed guidance update meant Ms R received unnecessary requests for a GRO letter. She recommended that HMPO apologise and make a consolatory payment.

Registering a child's birth is a **legal** requirement, so the IEC wrote to HMPO asking why their procedures allowed passports to be issued to unregistered children under the age of 16, where parents have deliberately chosen not to register the birth. The IEC was concerned that this undermined the GRO's role in supporting compliance with birth registration laws – and as GRO is a part of HMPO, this was all the more surprising. HMPO responded that although birth registration is a legal requirement, they may issue passports to unregistered children after assessing other available evidence using a balance of probabilities test, considering identity, nationality, safeguarding and fraud risks. They said they had worked with GRO to develop this approach, and that applicants must still prove identity, nationality and eligibility, otherwise HMPO were likely to refuse a passport.



IEC report

Ms S's legal name comprised a single word. She applied for a passport using her single word name, and included it in the field for forename and surname, along with a letter explaining she had only one name. In response, HMPO issued her passport with the forename field filled as "XXX."

The IEC found that HMPO's policy on single-name applicants (referred to as "uncommon names") uses "XXX" to populate the forename field if an applicant has only one name. This is accompanied by a passport observation stating that "XXX" does not form part of the person's name. On that basis, the IEC did not uphold Ms S's complaint about the formatting of her passport.

In recognition of the potentially unwanted associations with the placeholder "XXX," the IEC wrote to HMPO asking whether alternative placeholder formats had been considered. HMPO responded saying that "XXX" was widely used internationally in passports as a standard placeholder and that they had no plans to change their practice. However, they confirmed that the IEC's observations had been added to a risk register for consideration during the 2025 review of their names guidance.

IEC report

Ms T applied for a passport for her child, requesting a change of name and gender. HMPO guidance requires evidence of **name change** and consistent use, plus consent of both parents or a court order. A **gender change** requires medical evidence of permanence, plus the same legal requirements.

When HMPO asked for the above, Ms T complained about excessive evidence requests and wrongly insisting on obtaining the father's consent, despite her assertion that this would put them at risk. HMPO asked for evidence of the risk posed by contacting the father, and considered her evidence but deemed it insufficient, and maintained that they needed the father's consent or a court order. Eventually, HMPO agreed to issue the passport under the child's previous details, so they could meet planned travel arrangements. Ms T said her child being issued a passport showing their original name and gender amounted to discrimination. The IEC found that HMPO had followed their internal guidance and did not uphold the complaint.

Separately, the IEC wrote to HMPO about inconsistencies between public-facing and internal guidance about gender change. Publicly, applicants are told to provide a birth certificate or a letter from a doctor or consultant. Internally, HMPO accepts evidence from a broader range of medical professionals, and the guidance conflates healthcare **regulators** with **professional bodies**, and omits key information. The IEC recommended the alignment of internal and public guidance, which clarified the accepted evidence sources. HMPO said updates had been paused due to wider legal and policy work on gender issues, but an internal review was underway which would include consideration of the IEC's concerns.

General Register Office (GRO)

GRO is part of HMPO. It oversees civil registration in England and Wales and maintains the national archive of births, marriages and deaths.

Complaints activity:



15 complaints received

10 complaints accepted for examination

1 case closed, of which:

- **1** IEC report (partially upheld). The complaint we investigated concerned the accessibility of GRO services.

Financial redress:



A single consolatory payment of **£50** was made.

IEC letters:



We sent **one** letter, in response to which we received a holding response pending implementation of the agreed actions.

SLA performance

GRO met the SLAs in all but one instance during the reporting year.

General comments

We have continued to receive very few GRO complaints. The single complaint we investigated during the reporting year gave rise to an IEC service improvement letter, to which GRO responded promptly and positively.

IEC report

Mr U was in a race against time to trace his elderly cousin, but only knew their birth surname and adopted first name. He had spent hundreds of pounds on GRO birth certificates trying to find the correct one, and believed his search was hampered by GRO's search index not including a field for the mother's forename, only her maiden surname. This made it difficult to locate the correct entry, causing him to purchase multiple certificates that proved not relevant to his search.

The IEC did not uphold Mr U's complaint about the GRO index search, explaining that although he was right about its search limitations, customers can pay £3 for GRO to locate the correct certificate. If he had been aware of this, he could have saved himself much time, money and frustration.

However, the IEC found that GRO's complaint responses provided contradictory information and lacked clarity about the search options. As a result, the IEC upheld this element of the complaint and recommended a consolatory payment.

The IEC also sent a letter to GRO, raising concerns that the public guidance on the £3 search service lacked clarity, particularly as to whether customers could submit incomplete information. GRO accepted this feedback and confirmed they would update their website accordingly.



IEC service standards

Our performance against our 2024 to 2025 service standards is set out below.

We make every effort to complete IEC investigations within published service standards, but we will not compromise the thoroughness of an investigation in order to do so.

Regrettably, the failure on the part of some business areas to meet the agreed SLAs has had a direct impact on our performance.

We review our published service standards annually to ensure they are challenging but achievable, for the purpose of managing the expectations of complainants.

Service standard	Performance
Inform the complainant within two working days of receipt as to whether we can look at their complaint.	Achieved in 93% of cases
If the complainant has had a final response from the relevant business area, contact them within five working days of receipt to agree the scope of our examination.	Achieved in 61% of cases
Complete cases that can be resolved within 30 working days of agreeing the scope of our examination.	Achieved in 78% of cases
Complete cases that we can settle within 40 working days of the complaint being allocated to an investigator.	Achieved in 58% of cases
Complete cases that require an IEC investigation report within 70 working days of the complaint being allocated to an investigator.	Achieved in 45% of cases

Voice of the complainant

We are committed to providing complainants with a first-rate service and welcome all feedback on how we are doing – both good and bad.

Complaints about our service or the outcome of an IEC investigation

If we fail to meet complainants' expectations, we make every effort to try and understand what went wrong and why, so we can prevent the problem reoccurring. We have procedures for dealing with complaints about our service, or the outcome of an IEC investigation.

During the reporting period we received 30 complaints about our service, the majority of which concerned the delay in allocating complaints for investigation. Of these, we upheld one and partially upheld five. We used the learning from the service complaints we upheld to improve our operational procedures.

Example: In response to a complaint that we failed to understand the crux of the complainant's concerns about our service, the business support team manager now routinely offers complainants a phone call, before we respond to their concerns, to ensure we have properly understood their complaint.

We also received 18 complaints about the outcome of IEC investigation reports, three of which were partially upheld.

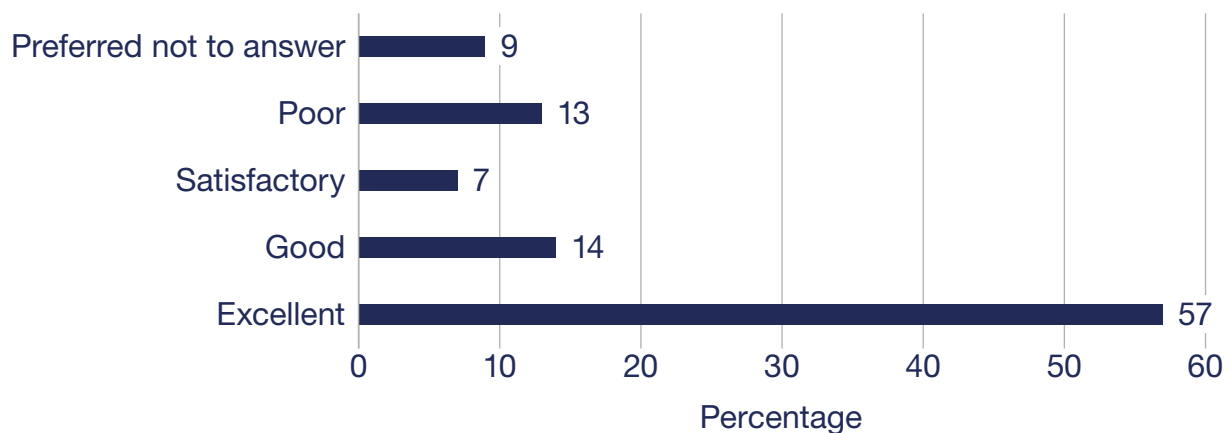
In responding to internal complaints, we remind the complainant that if they are dissatisfied with the service provided by the office of the IEC, or the outcome of an IEC investigation, they can escalate their complaint to the Parliamentary and Health Service Ombudsman, or in the case of outcome complaints about DS, to the Prisons and Probation Ombudsman.

Customer satisfaction

We routinely issue customer satisfaction surveys to complainants after we have closed their complaint with this office, inviting them to comment on the quality and responsiveness of our service.

Complainants' views often reflect how they feel about the outcome of their complaint, rather than their experience of using our service.

The chart below shows the results of the customer satisfaction questionnaire responses we received:



Ombudsman investigations about the IEC

If a complainant is dissatisfied with the outcome of our investigation, they can escalate their concerns to the Parliamentary and Health Service Ombudsman, or the Prisons and Probation Ombudsman. This is explained to the complainant within all final IEC investigation reports.

At the end of the reporting year there had been no Ombudsman investigations concerning the service provided by the office for the IEC, or the outcome of an IEC investigation.

