



An inspection of Administrative Reviews

April 2025 to August 2025

John Tuckett

Independent Chief Inspector of
Borders and Immigration

An inspection of Administrative Reviews

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Our purpose

To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

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Foreword

Ten years after administrative review (ARs) replaced a raft of rights to appeal to the Immigration and Asylum Tribunal, the system is a long way from working in the way that was intended.

During the passage of the 2014 Immigration Bill, parliamentarians and others were concerned that a process that was internal to the Home Office was not an adequate substitute for the right of appeal. Their concerns focused on the effectiveness of ARs in identifying and correcting caseworking errors, and the independence of the AR decision maker (DM) in terms of their separation from the original DM. These 'tests' were written into the Immigration Act 2014, together with a requirement for the ICIBI to inspect the new AR arrangements within one year of them coming into effect.

This was the third full inspection carried out by ICIBI, and while it again applied the original 'tests', it found that these were no longer the principal concern. The time the Home Office is now taking to respond to AR applications (with the exception of those raised at the border by individuals denied entry) means that, even where ARs identify and correct caseworking errors, an AR is no longer an efficient and effective mechanism for seeking resolution where an applicant believes an error has been made.

The government's 'Statement of Intent' accompanying the 2014 Immigration Bill, referred to a service standard of 28 days for the Home Office to complete an AR, which it explained was much faster than the then average of 12 weeks for a managed migration appeal to be heard. Having abandoned the 28-day service standard in 2021, GOV.UK advises that "Currently, it can take 12 months or more to receive the result of the administrative review." Had this been proposed, or even acknowledged as a possibility over time, it is inconceivable that the sections of the Bill extending the AR system would have survived.

I have made seven recommendations, some with several strands to them, reflecting the extent of the challenges the Home Office faces in recovering the AR system. Some recommendations repeat what I recommended in my previous inspections of ARs in 2016 and 2020. The fact that I am having to repeat these recommendations is a sign of the AR system having been allowed to go to the bottom of the pile in the competition for Home Office resources, including IT that would improve its efficiency and the picture of how it is performing.

I acknowledge that the Home Office is facing many challenges, a number of which are bigger in scale and more acute than fixing the AR system, and that its resources will be even more stretched over the next few years as it looks to reduce its overall expenditure. However, the AR system should not be allowed simply to continue as it is. Aside from the impact on applicants, the Home Office should recognise that a failing AR system is unhelpful at a time when the government is contemplating substituting the right of appeal to the Immigration and Asylum Tribunal in certain asylum cases with an administrative alternative, albeit one that is independent of the department.

Two further points. It was suggested to inspectors that AR overturn rates are an indicator of the quality of original decisions. This is true only insofar as the quality of ARs is assured and the AR system is regarded by dissatisfied 'customers' as providing an efficient and effective remedy. However, it does touch on a key issue, which is that the focus should be on getting original decisions right first time.

The second point concerns the way the Home Office oversees the implementation of recommendations. In this instance, repeated requests to extend deadlines were signed off by Home Office managers over months and years. This approach is a green light to delaying action in relation to those recommendations that the business in question does not like or fully support until their relevance and value is degraded to the point where they can be abandoned. It undermines the value of ICIBI's inspections. While further inspections like this one can identify delays and, if appropriate, repeat recommendations, the Home Office should be doing more to ensure that where it has accepted a recommendation and committed to a course of action, it follows this through in a timely manner.

The above represents the views of my predecessor as ICIBI, David Bolt, under whose leadership and direction this inspection was conducted.

This report was sent to the Home Secretary on 17 October 2025.

John Tuckett
Independent Chief Inspector of Borders and Immigration

1. Background

The removal of appeal rights

- 1.1** The 2014 Immigration Act removed the right of appeal to the Immigration and Asylum Tribunal for various types of immigration decisions. Administrative review (AR), a process internal to the Home Office was set up to replace the appeal right, aimed at providing “a proportionate and less costly mechanism for resolving caseworking errors”.¹
- 1.2** The 2014 Act reduced the types of decisions that enjoyed the right of appeal under the Nationality, Immigration and Asylum Act 2002, from 17 to four:
- international protection claims (asylum or humanitarian protection applications)
 - decisions to revoke refugee status or humanitarian protection
 - claims for the right to remain in the UK under European law
 - human rights claims²
- 1.3** The changes set out in the 2014 Act came into full effect on 1 April 2015. From this date, AR applicants were required to pay a fee of £80, which was equivalent to the cost of a paper hearing should an appeal be lodged with the First Tier Tribunal. This fee has not changed, despite the increased costs to the Home Office of running the process.

What is an administrative review?

- 1.4** An AR is the review of an eligible decision to determine whether the original immigration decision was wrong due to a caseworking error as defined in Appendix Administrative Review (Appendix AR) of the Immigration Rules.
- 1.5** An application for AR must relate to one of the following decisions, referred to as “eligible decisions”.³
- refusal of an application for entry clearance: this refers to decisions where an individual’s request to enter the UK has been denied
 - refusal of an application for permission to enter: this applies when a person is refused permission to enter the UK, even if they are already at the UK border or at an entry point
 - refusal of an application for permission to stay: this involves the denial of an application made by a person already in the UK to extend or change their stay

1 Home Office, Immigration Bill – Factsheet: Appeals (clauses 11–13) July 2013. https://assets.publishing.service.gov.uk/media/5a7c5265ed915d3d0e87b98a/Factsheet_05_-_Appeals.pdf

2 Nationality, Immigration and Asylum Act 2002. <https://www.legislation.gov.uk/ukpga/2002/41>

3 Immigration Rules, Appendix AR, sections 2.1 and 2.2. <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-administrative-review>

- cancellation of permission to enter or stay: this refers to decisions made at the time of arrival in the UK, where an individual's permission to enter or stay is cancelled. The cancellation must occur due to:
 - a change in circumstances after the original permission was granted, making it necessary to cancel the permission
 - false representations made by the applicant
 - failure to disclose material facts during the application process⁴

1.6 Prior to the 2014 Act, an AR was already available for refusals of entry clearance applications made overseas under the points-based system (PBS). From October 2014, AR was introduced for decisions made in-country, initially for a limited number of immigration routes, primarily those falling under the PBS:

- refusal of an application for leave to remain as a Tier 4 Migrant under the PBS^{5,6}
- refusal of an application for leave to remain as the partner of a Tier 4 Migrant under paragraph 319C of the Immigration Rules
- refusal of an application for leave to remain as the child of a Tier 4 Migrant under paragraph 319H of the Immigration Rules
- decisions to grant leave to remain under any of the above categories, where the applicant requested a review of the grant period⁷

1.7 Between 2015 and 2019, AR was extended to cover a broader range of routes, including:

- Tier 1, Tier 2, Tier 5 and dependants under the PBS
- certain visit visa refusals
- in-country applications for leave to remain
- EU Settlement Scheme (EUSS) decisions
- Border Force decisions, such as cancellation of leave at the border (including at the juxtaposed controls)^{8,9}

1.8 According to information provided by the Home Office, the number of routes eligible for an AR had risen from one in 2014 (Tier 4 Migrants and their dependants) to 51 by December 2020.¹⁰ As at August 2025, the number of eligible routes listed in rule AR1.1 of Appendix AR stood at 36.¹¹

4 Home Office, Administrative Review: caseworker guidance. <https://webarchive.nationalarchives.gov.uk/ukgwa/20250812195845/https://www.gov.uk/government/publications/administrative-review> <https://www.gov.uk/government/publications/administrative-review>

5 'Leave to remain' was the terminology used in the Immigration Rules prior to the introduction of the simplified rules in 2020. It has since been replaced by the term 'permission to stay'.

6 'Tier 4 Migrant' was the term used under the Points Based System to refer to international students. This has since been replaced by 'Student' and 'Child Student' routes under the simplified Immigration Rules.

7 Archived Immigration Rules, Appendix AR, https://assets.publishing.service.gov.uk/media/5a75c1c540f0b6488c78eb78/Immigration_Rules_-_consolidated_version20141020.pdf

8 Tier 1 routes have been replaced by the Innovator Founder and Global Talent routes. Tier 2 has become the Skilled Worker route, and Tier 5 subcategories have been absorbed into various Temporary Work routes.

9 Archived Immigration Rules, Appendix AR, https://assets.publishing.service.gov.uk/media/5e5d1f12d3bf7f06f9175bfa/Immigration_Rules_-_Archive_04-12-2019.pdf

10 Archived Immigration Rules, Appendix AR, <https://www.gov.uk/government/publications/immigration-rules-archive-1-december-2020-to-30-december-2020>

11 Archived Immigration Rules, Appendix AR, <https://www.gov.uk/government/publications/immigration-rules-archive-13-august-2025-to-3-september-2025>

Applying for an administrative review

- 1.9** Individuals seeking an AR of an immigration decision must apply to the Home Office. The deadline for submitting an AR varies according to the circumstances of the case. See Figure 1:¹²

Figure 1: AR deadline by application type

| Circumstances of case | AR deadline |
|---|---|
| Border Force ARs | |
| Cancellation of permission to stay or enter at port of entry | If the applicant is detained, seven calendar days from receipt of decision notice, otherwise 14 calendar days from receipt of decision notice |
| Cancellation of permission to stay or enter at a juxtaposed control | 28 calendar days from receipt of decision notice |
| In-country ARs | |
| Refusal of permission to stay | 14 calendar days from receipt of decision notice |
| International ARs | |
| Refusal of entry clearance (visa refusal) | 28 calendar days from receipt of decision notice |

- 1.10** Applicants meeting the eligibility requirements must submit their application online via GOV.UK. To be considered valid, the application must be made within the relevant AR deadline and with the appropriate fee, in most cases £80. However, at the time of the inspection there were AR fee exemptions where the applicant was exempt from paying for their original immigration application or where the fee for their original application had been waived.¹³
- 1.11** An AR application may be accepted outside of the relevant deadline if the Administrative Review Unit (ARU) determines that it would be unfair not to waive the time limit, and that the application was submitted as soon as reasonably possible.¹⁴

Customer service standard

- 1.12** Prior to the introduction of the changes made under the 2014 Act, the then Immigration Minister committed to a service standard of 28 days for processing ARs.
- 1.13** The ICIBI's previous inspections of ARs (in 2015, 2016 (a re-inspection), and 2019) found that most ARs were completed within the 28-day service standard. However, this latest inspection found that, since 2021, processing times for in-country, international, and EUSS AR applications have increased significantly, and the 28-day service standard has effectively been abandoned. Since 2021, only those ARs processed by Border Force and relating to visa or leave cancellations have been typically completed within 28 days.

¹² Home Office, 'Administrative Review: caseworker guidance'.

¹³ Home Office, 'Administrative Review: caseworker guidance'.

¹⁴ Immigration Rules, Appendix AR, section 2.

Possible AR outcomes

- 1.14** Appendix AR sets out four possible outcomes where an AR application has been accepted as valid:
- it succeeds, and the original decision is withdrawn (and will be reconsidered)
 - it does not succeed, and the original decision stands, with all the reasons for the decision maintained
 - it does not succeed, and the original decision stands, but with one or more of the reasons for the decision withdrawn
 - it does not succeed, and the original decision stands, but with different or additional reasons than those initially provided¹⁵
- 1.15** According to the Home Office's 'Administrative Review: caseworker guidance', the application fee should normally be refunded to the applicant within three weeks of the date of the AR decision under the following conditions:
- the application is deemed invalid and consequently rejected
 - the original decision is withdrawn, and leave is granted to rectify an error identified through the AR process
 - the original decision is withdrawn, and the application is referred back to the initial decision-making unit (DMU) for reconsideration¹⁶
- 1.16** A refund of the application fee is not permitted if the outcome of the AR results in the original decision being maintained. However, applicants may submit a second AR application, without a further payment, if new reasons have been introduced in the review of the decision and the applicant believes that these new reasons contain an error.¹⁷

Withdrawing an AR application

- 1.17** The applicant may withdraw their AR application by notifying the Home Office in writing. In addition, an AR will be considered withdrawn in the following circumstances:
- the applicant waives their right to apply by signing an AR waiver form¹⁸
 - the applicant leaves the UK
 - the applicant requests the return of their passport because they want to travel outside the UK
 - the applicant makes a new application for entry clearance, permission to enter, or permission to stay¹⁹
- 1.18** In each of these scenarios, the AR will not proceed and will be treated as withdrawn.

¹⁵ Immigration Rules, Appendix AR, section 5.1.

¹⁶ Home Office, Administrative Review: caseworker guidance.

¹⁷ Home Office, Administrative Review: caseworker guidance.

¹⁸ The AR waiver form allows a person to declare that, although they may make an administrative review application of a decision, they will not do so. By completing and signing the waiver form, they are confirming that they will not apply for an administrative review of the decision.

¹⁹ Home Office, Administrative Review: caseworker guidance.

Previous ICIBI inspections

1.19 When the 2014 Immigration Bill was debated in Parliament, some MPs and peers argued that an internal Home Office AR system would not be an effective replacement for an appeal to an Immigration and Asylum Tribunal judge who was independent of the Home Office. An amendment was made to the Bill during its passage through the House of Lords, resulting in section 16 of the 2014 Act, which stated:

“Before the end of the period of 12 months beginning on the day on which section 15 comes into force, the Secretary of State must commission from the Chief Inspector [of Borders and Immigration] a report that addresses the following matters –

- the effectiveness of administrative review in identifying caseworking errors
- the effectiveness of administrative review in correcting caseworking errors
- the independence of persons conducting administrative review (in terms of their separation from the original decision-maker).²⁰

First ICIBI inspection: Implementation and early findings (2015-2016)

1.20 In June 2015, the then Home Secretary commissioned the ICIBI to produce a report addressing the three matters identified in section 16. The Independent Chief Inspector determined that, in addition, the inspection would examine service standards in dealing with ARs, consistency across the different areas of the Home Office handling ARs, organisational learning, and cost savings (part of the government’s argument for introducing ARs was that it would save £261 million over ten years).

1.21 ICIBI’s completed report was sent to the Home Secretary on 4 April 2016.²¹ The main findings were that levels of accuracy and consistency varied between in-country, overseas (international) and at-the-border ARs, but overall, there was significant room for improvement in respect of the effectiveness of ARs in identifying and correcting caseworking errors, and in communicating decisions to applicants.

1.22 The Home Office had created a separate, dedicated team to handle in-country ARs, but most international and at-the-border ARs were carried out locally. While the inspection found no indications of bias, it was harder to evidence that international and at-the-border caseworkers were truly separate and independent of the original decision maker (DM). Except in a proportion of international applications, the Home Office was comfortably meeting the 28-day service standard for responses. Meanwhile, there was no systematic feedback to reviewers, or to original DMs, regarding decisions that had been subject to a successful legal challenge, so organisational learning was at best patchy. In terms of cost savings, the Home Office had yet to do any analysis.

1.23 The report made 14 recommendations, grouped under four headings: administrative review applications; consideration of reviews; quality assurance; and learning.²²

20 Immigration Act 2014, section 16. <https://www.legislation.gov.uk/ukpga/2014/22/section/16>

21 Independent Chief Inspector of Borders and Immigration (ICIBI), ‘An inspection of Administrative Review’ (May-December 2019) (published 20 May 2020), <https://www.gov.uk/government/publications/an-inspection-of-administrative-reviews-may-december-2019>

22 ICIBI, ‘An inspection of the Administrative Review processes introduced following the 2014 Immigration Act’, <https://www.gov.uk/government/publications/inspection-report-on-administrative-review-processes-may-2016>

- 1.24** The Home Office accepted 13 of the 14 recommendations in full.²³ Recommendation 9 concerned clarifying the guidance to require reviewers to correct all errors in the original decision, not just those identified by the applicant, including conducting further checks where necessary. This was aimed at aligning in-country ARs with international and at-the-border ARs which involved a full reconsideration of the refusal decision. This recommendation was partially accepted.
- 1.25** In its published response, the Home Office noted that it had “amended its guidance and training for in-country caseworkers to make clearer that where they identify an error in the course of their review, they should correct it even if the applicant has not raised that point.” However, it rejected introducing a policy requiring a full reconsideration of in-country decisions, arguing that:

“If in-country applicants were not required to specify reasons for the review it could lead to abuse of the system as general requests for reconsideration without any specific reasons could be submitted in an attempt to delay departure from the UK.”²⁴

Re-inspection of administrative review (January-March 2017)

- 1.26** In early 2017, ICIBI conducted a re-inspection of ARs.²⁵ This found that the handling of in-country ARs had improved considerably, but progress in relation to international and at-the-border ARs had been slower.
- 1.27** The re-inspection concluded that six of the original 14 recommendations could be considered ‘closed’. However, the Home Office was not yet able to demonstrate that it had delivered an efficient, effective and cost-saving replacement for the previous appeals mechanisms. This was made more difficult because ARs were split across three different business areas, and the re-inspection report suggested that the Home Office should consider appointing a senior responsible owner (SRO) for the overall system of ARs to ensure consistency and benefits realisation.
- 1.28** In its response, the Home Office confirmed that it would appoint an SRO for in-country and international ARs, which were handled by separate directorates within UK Visas and Immigration (UKVI). However, at-the-border ARs would continue to be managed by Border Force operations as these were part of Border Force’s function in securing UK borders.²⁶
- 1.29** The Home Office also confirmed that it was undertaking analysis of the changes made to appeals and ARs and expected to publish the findings “in due course.”²⁷

Second ICIBI inspection: May-December 2019

- 1.30** Between May and December 2019, ICIBI carried out a further inspection of ARs. The inspection report was published in May 2020.²⁸ The inspection looked again at the section 16 tests. While

23 ‘Home Office response to the Independent Chief Inspector’s report: an inspection of the administrative review processes introduced following the 2014 Immigration Act, 26 May 2016’, <https://www.gov.uk/government/publications/home-office-response-to-the-report-on-an-inspection-of-the-administrative-review-processes-introduced-following-the-2014-immigration-act>

24 Home Office, ‘Home Office response to the Independent Chief Inspector’s report: an inspection of the administrative review processes introduced following the 2014 Immigration Act’.

25 Independent Chief Inspector, ‘A re-inspection of the Administrative Review process’, (published 13 July 2017). <https://www.gov.uk/government/publications/a-re-inspection-of-the-administrative-review-process--2>

26 ‘Home Office response to the Independent Chief Inspector’s report: A re-inspection of the Administrative Review process’, 13 July 2017, <https://www.gov.uk/government/publications/home-office-response-to-the-report-a-re-inspection-of-the-administrative-review-process>

27 Home Office response, ‘A re-inspection of the Administrative Review process’, January–March 2017.

28 ICIBI, ‘An inspection of Administrative Review, May–December 2019.’

at-the-border ARs, which were small in number, continued to be managed by Border Force, all other ARs (in-country, international, and EUSS) were now handled by one dedicated unit within UKVI.²⁹

- 1.31** Accepting that any review process that was internal to the Home Office would struggle to prove it was truly independent, the inspection found that the arrangements for in-country, international, and EUSS ARs created as much separation from the original DM as was possible, while the decision-making and review functions remained under one Director General. Meanwhile, examination of case files and interviews with frontline officers raised some concerns that the Border Force AR process needed to be better managed and to have greater oversight.
- 1.32** The inspection identified that ARU reviewers were generally effective in identifying and correcting objective errors, such as the misapplication of the Immigration Rules, the overlooking of relevant evidence or the granting of the wrong length or conditions of leave. However, the AR process was “of little or no value where original decisions to refuse were based on the decision maker’s assessment of the applicant’s credibility”, since the AR reviewer was constrained to consider only the same evidence as the original DM. As such, “the process was geared more towards demonstrating that the Home Office had not made an error rather than in reaching the most appropriate outcome for the applicant.” This raised concerns about the quality of customer service, particularly in cases involving potentially vulnerable individuals.
- 1.33** Other ICIBI inspections had drawn attention to how the Home Office’s management of the EUSS stood out when compared with other borders and immigration processes in terms of the lengths the Home Office was prepared to go to in order to ensure the best possible outcome for applicants.³⁰ Inspectors found that this was also true for EUSS ARs, where reviewers were able to consider new evidence submitted by AR applicants.

2019 recommendations and Home Office responses

- 1.34** The 2019 AR inspection report concluded that:

“after almost five years, the Home Office should be thinking beyond merely tweaking its processes and should be asking whether the AR “system” has delivered the benefits, including for applicants, that it claimed it would during the passage of the Immigration Act 2014. If the answer is “no”, or “not yet”, it needs to take a more fundamental look at the scope of ARs and at what it is seeking to achieve through them.”³¹

- 1.35** The report contained five recommendations, aimed at improving AR processes and oversight, including urgently improving AR reporting and data to provide a true picture of how ARs were working.³² Following on from the report’s overall conclusion, the ICIBI recommended that the Home Office should:

“Conduct and publish a full evaluation of the Administrative Review (AR) system, baselined against the “Objectives” and “Appraisal (Cost and Benefits)” set out in the 2013 ‘Impact

29 Previous ICIBI reports have used the term ‘overseas applications’ when referring to ARs submitted in response to decisions to refuse entry clearance overseas. The Home Office describes these as ‘international’ applications, and this term has been adopted in this report for reasons of consistency.

30 ICIBI, ‘A further inspection of EU Settlement Scheme (July 2020 – March 2021)’. <https://www.gov.uk/government/publications/a-further-inspection-of-the-eu-settlement-scheme-july-2020-march-2021>

31 ICIBI, ‘An inspection of Administrative Review’, May–December 2019.

32 ICIBI, ‘An inspection of Administrative Review’, May–December 2019.

Assessment of Reforming Immigration Appeal Rights' and other official statements made during the passage of the Immigration Bill 2014."³³

- 1.36** The Home Office accepted this recommendation and wrote that it was conducting an evaluation on the effectiveness of the implementation of AR. It aimed to complete the evaluation by the end of summer 2020.³⁴
- 1.37** However, at the start of the current inspection, this had still not been done. In its April 2025 monthly update of progress against ICIBI recommendations, the Home Office wrote: "14/02/25 – DELAY REQUIRED UNTIL 30/06/25. Report now in hands of HOAI [Home Office Analysis and Insight] colleagues, who have confirmed now that all available data has been provided, they will be sending a draft in the next month. Request extension of due date to 30/06/25 to allow for final drafting and amendments and SCS [Senior Civil Servant] review from both operational and policy sides."³⁵ The June monthly update referred to a further extension until 15 August 2025 explaining that "HOAI are still finalising the draft report following other white paper priority work in recent weeks. Colleagues will share draft report approx 26 June for G5 [Grade 5] sign off. Ministerial submission will be needed to clear for publication. End date to be changed to 15/08/25 to allow for above adjusted timescales."
- 1.38** At the time of writing the 2025 inspection report, ICIBI had just received the August 2025 monthly update, which read: "20/08/25 DELAY REQUIRED UNTIL 31 OCTOBER. The review draft report has been finalised and cleared at SCS level. It has also been shared in its draft form with the ICIBI inspection team. Publication is the final outstanding step which needs ministerial clearance. A submission is currently being finalised by HOAI, but given current recess and other priorities on return after recess, end date to be changed to 31/10/25 to account for the lack of control over ministerial capacity to consider final publication."
- 1.39** The draft report shared with inspectors, entitled 'Review of the changes to the appeals process in the Immigration Act 2014', was dated July 2025. It considered whether the introduction of the AR process had improved processing times, had a positive impact on the residual appeals system, and delivered value for money.
- 1.40** The draft report concluded that AR processing times, measured against a 28-day service standard, had improved in comparison to the appeals system, and "between 2014 and 2019, this target was largely met." Since 2020, external factors such as global instability and the recovery from the COVID-19 pandemic, had led to a significant increase in AR intake, and: "Processing times have suffered as a result, rising to an average of 362 days per case in 2024 ... and resulting in current guidance stating wait times of up to 12 months."
- 1.41** The introduction of the AR process was found to have "coincided with a reduction in the number of appeals handled by the Immigration and Asylum Tribunals since 2015" and "... streamline[d] tribunals' caseload by resolving simpler disputes outside the tribunal system." Tribunal productivity, measured by disposals per sitting day, have "decreased over the same period, likely reflecting the increasing complexity of cases being heard."
- 1.42** In terms of value for money, when introduced in 2015 the AR system was expected to be cost neutral for the Home Office, but to deliver overall savings of £261 million over ten years from the reduction in appeals. The draft report found that the £80 AR fee was insufficient to cover

33 ICIBI, 'An inspection of Administrative Review', May–December 2019.

34 Home Office 'An inspection of Administrative Review', May–December 2019.

35 The Home Office, Analysis and Insight unit is responsible for providing business areas with analytical services and insight during policy development, as well as supporting operational decision making.

the current cost of processing complex AR applications, such as EUSS ARs, and estimated that the AR system had led to a £35 million funding shortfall for the Home Office. However, taking into account the cost savings to His Majesty's Courts & Tribunal Service, the AR system had delivered an overall net saving to the UK taxpayer of £182 million over ten years. The report also noted that further reform and improved data monitoring were required to maintain effectiveness and ensure long-term value for money.

- 1.43** The Home Office also accepted a multi-faceted recommendation from the 2019 inspection regarding the guidance and directions given to AR reviewers, aimed at improving overall performance, including in respect of the exercise of discretion by reviewers, decision letter quality, oversight of AR waivers, refunds, and formal complaints, and timescales for the reconsiderations of original decisions. The Home Office noted that AR policies, processes and guidance would be included in a wider project looking at the simplification of the Immigration Rules, which it aimed to complete by the end of 2020.
- 1.44** The August 2025 update on progress against ICIBI recommendations noted: "20/08/25 – DELAY REQUIRED until 31/10/25. Dependent on conclusion of other outstanding ICIBI recommendation – review of AR system. Policy leads have been requested to review the extent of the response to this recommendation now that the AR system report is signed off and in light of the recent guidance change, and have been asked to ensure all additional guidance changes are completed by 31/10/25."
- 1.45** The Home Office partially accepted two other recommendations from the 2019 inspection. One concerned capturing and analysing data in relation to ARs and mandating on record-keeping standards and data requirements for AR casework in caseworker guidance and instructions, which the Home Office accepted. The report went on to recommend the publication of quarterly performance data and details of improvements made to policies, guidance and original decision making as a result of lessons learned from ARs. The Home Office only partially accepted this recommendation, stating that it would "consider publication of data and service standards on Administrative Review following the full implementation of the Atlas casework database by end of 2021", but that some feedback from ARs "may contain sensitive information that is not suitable for the public domain." The Home Office subsequently recorded both these recommendations as 'closed'.
- 1.46** The Home Office had linked its partial acceptance of the recommendation to publish AR performance data to "the full implementation of the Atlas casework database by the end of 2021" when it would "consider the publication of data and service standards". A subsequent entry in the 'recommendations tracker' indicated the extent of the ARU's frustrations with the lack of progress with Atlas:

"27/03/24: Submit for closure with SCS approval. Justification for closure: We only partially accepted the recommendation. Delivering the recommendation is completely reliant on an Atlas and Vantage roadmap which has significantly slipped. Two AR workstreams are on Atlas, but neither signed off as BAU [business as usual] due to ongoing bugs. Two AR workstreams are still not on Atlas, with one of them being the international workstream which is not worked on CID [Casework Information Database], and therefore will not be prioritised with CID-decom projects. As we are still not even close to full Atlas roll-out, and none of the 4 workstreams has a reliable Vantage MI [management information] product, then the possibility of published stats is still not a reality. It has been nearly 4 years with very little control on the progress of the Atlas project, and so there is little value keeping an ongoing recommendation which we only partially committed to."

- 1.47** In 2025, inspectors found that this situation had not materially improved.
- 1.48** The second partially accepted recommendation concerned Border Force ARs. ICIBI recommended that the Home Office should “Create a single, dedicated unit within Border Force to deal with all at-the-border Administrative Review (AR), responsible to a nominated Border Force Senior Civil Servant (SCS) and with formal reporting lines to the Appeals, Litigation and Administrative Review (ALAR) SCS regarding at-the-border AR performance.”
- 1.49** The Home Office responded that, by the end of 2020-2021, it would create a dedicated Border Force unit to handle all at-the-border ARs, which would be wholly independent of operational managers involved in the initial decision-making process. While this new unit would work closely with ARU, the Home Office did not agree that there should be formal lines of reporting to the SCS in charge of ALAR. The Border Force Administrative Review Hub (BF AR Hub) was established in September 2020.
- 1.50** The Home Office rejected the final recommendation from the 2019 inspection report, that the Home Office should “Present to the Borders Immigration and Citizenship System (BICS) Board a detailed (not simply statistical) quarterly report on the Administrative Review (AR) system, covering how in-country, overseas, at-the-border and EU Settlement Scheme ARs are working, the issues raised and lessons learned, risks and proposed actions (including by areas responsible for making eligible decisions).”
- 1.51** The Home Office wrote:
- “The Department acknowledges the importance of an effective Administrative Review system and will consider how to best report on its performance and to what forum. As the ICIBI has noted performance in ARU is already closely monitored by various boards within UKVI, and the creation of a dedicated Border Force Unit will also allow for better oversight. Given the range of topics and operational areas the BICS board covers, and the need to retain flexibility to focus on emerging issues, we do not accept the recommendation as drafted. We will, however, further consider how management information on, and learning from, Administrative Review is included in wider discussions about system performance.”³⁶

Other changes since the 2019 inspection

- 1.52** The right to request an AR for decisions made under the EU Settlement Scheme (EUSS) was formally withdrawn on 4 April 2024. This followed earlier amendments to the Immigration Rules, introduced on 5 October 2023, which confirmed the statutory right of appeal as the sole mechanism for challenging EUSS decisions.^{37,38}
- 1.53** In April 2025, the scope of ARs was amended to remove the correcting of certain types of caseworking errors, specifically those relating to the conditions or duration of a grant of permission for in-country cases. To streamline processes and avoid duplication, these cases are now handled through the error correction route, which is free of charge and already in use for international decisions.³⁹

36 Home Office response to ‘An inspection of Administrative Review’, 20 May 2020, https://assets.publishing.service.gov.uk/media/5ec2b792d3bf7f5d43765d48/Formal_Response_Administrative_Reviews.pdf

37 GOV.UK, Guidance, ‘EU Settlement Scheme: administrative review’, (last updated 10 February 2025), <https://www.gov.uk/guidance/eu-settlement-scheme-apply-for-an-administrative-review>

38 Home Office, ‘Explanatory memorandum to the statement of changes in immigration rules presented to Parliament on 7 September 2023 (hc1780)’, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182958/E02973776_-_HC_1780_-_EXPLANATORY_MEMORANDUM_Print_Ready_.pdf

39 Home Office, ‘Explanatory memorandum to the statement of changes in Immigration Rules presented to Parliament on 12 March 2025 (HC 733)’.

2. Scope and methodology

2.1 This inspection examined the efficiency and effectiveness of administrative review (ARs) in identifying and correcting caseworking errors, and the independence of persons conducting ARs, with particular focus on:

- whether the Home Office is appropriately resourced to make AR decisions efficiently and effectively
- the effectiveness of workflow processes to triage and prioritise applications, in order to minimise any delays and backlogs
- the quality, timeliness, and consistency of AR decision making
- the quality assurance of AR decisions and feedback loops to the original decision-making unit (DMU) to drive improvements
- communication and engagement between Home Office AR teams and applicants and stakeholders/representative groups

2.2 Inspectors:

- conducted research using open-source material, including published ICIBI inspection reports and Home Office guidance
- on 4 April 2025, formally notified the Home Office of the intention to inspect the two operational areas processing AR applications – the Administrative Review Unit (ARU) in Salford and the Border Force Administrative Review Hub (BF AR Hub) at Glasgow Airport
- between 18 and 19 April 2025, undertook familiarisation visits to the ARU and BF AR Hub
- conducted interviews with two stakeholders during the familiarisation phase of the inspection
- on 11 March 2025, published a call for evidence on the ICIBI website, seeking submissions from anyone with knowledge or experience of the AR process
- analysed 24 submissions to the call for evidence from a range of stakeholders, including non-governmental organisations, representatives of the education sector, legal representatives, charities and AR applicants with lived experience
- examined a sample of 71 international, 29 EU Settlement Scheme, 21 in-country and 11 BF AR applications, selected at random from ARs decided between 1 March 2024 and 31 March 2025
- in March, April and July 2025, requested and analysed 457 pieces of documentary evidence from the Home Office
- between 9 and 24 June 2025, conducted 42 interviews and focus groups with 108 members of staff from grades Administrative Officer to Senior Civil Servant (Grade 5)

- between 7 and 9 July 2025, presented the inspection's emerging findings to the responsible Home Office Senior Civil Servants and Deputy Directors for ARU and Border Force AR operations
- on 26 September 2025, sent the report to the Home Office for factual accuracy checking.

3. Key findings

Previous inspections

- 3.1** When the present system of administrative reviews (ARs) was introduced a decade ago, the government's stated intention was to provide "a proportionate and less costly mechanism for resolving caseworking errors".⁴⁰
- 3.2** During the passage of the 2014 Immigration Bill, parliamentarians and others were concerned that a process that was internal to the Home Office was not an adequate substitute for the right of appeal to the Immigration and Asylum Tribunal. These concerns were written into the Immigration Act 2014 together with a requirement for the ICIBI to inspect the new AR arrangements within one year of them coming into effect, focusing on the effectiveness of ARs in identifying and correcting caseworking errors, and on the independence of the AR decision maker (DM) in terms of their separation from the original DM.
- 3.3** ICIBI's initial inspection, published in May 2016, identified significant room for improvement in respect of the effectiveness of AR DMs in identifying and correcting caseworking errors, and in communicating decisions to applicants. With regard to independence, ICIBI found that the creation of a dedicated team to handle in-country ARs meant that their separation from the original DM was easier to evidence than that of staff handling international and at-the-border ARs. The Home Office accepted in full 13 of ICIBI's 14 recommendations for improvements, though one year on, a re-inspection found that progress towards implementing them had been uneven.
- 3.4** By the time ICIBI carried out a second full inspection of ARs in 2019, the number of routes eligible for an AR had increased, but their purpose remained the same, and the 'tests' in the 2014 Immigration Act remained central. By this point, the dedicated Administrative Review Unit (ARU) within UK Visas and Immigration (UKVI) was responsible for all ARs, except at-the-border ARs which continued to be dealt with within Border Force. However, where the ARU DM concluded that the refusal of a visa to an individual applying from overseas should be reconsidered, the case was returned to the original decision-making unit (DMU). In some cases, it was returned to the person who made the original decision, which raised questions about independence as well as adding an extra stage and delay to the process. These structures and handling arrangements were still in place in 2025.
- 3.5** The 2019 inspection found that reviewers were generally effective in identifying and correcting objective errors, such as the misapplication of the Immigration Rules, the overlooking of relevant evidence, or the granting of the wrong length or conditions of leave. However, the AR process was "of little or no value where original decisions to refuse were based on the decision maker's assessment of the applicant's credibility", since, except for ARs of EU Settlement Scheme (EUSS) decisions, reviewers were restricted to considering only the evidence that was

⁴⁰ GOV.UK, UK Visas and Immigration and Immigration Enforcement, 'Immigration Bill: part 2 – appeals (Factsheet 5: Appeals)', Published 10 October 2013. <https://www.gov.uk/government/publications/immigration-bill-part-2-appeals>

available to the original DM.⁴¹ As such, ICIBI found that “the process was geared more towards demonstrating that the Home Office had not made an error rather than in reaching the most appropriate outcome for the applicant”, which raised concerns about the quality of customer service, particularly in cases involving potentially vulnerable individuals.

- 3.6** The 2019 inspection concluded that “after almost five years, the Home Office should be thinking beyond merely tweaking its processes and should be asking whether the AR ‘system’ has delivered the benefits, including for applicants, that it claimed it would during the passage of the Immigration Act 2014. If the answer is ‘no’, or ‘not yet’, it needs to take a more fundamental look at the scope of ARs and at what it is seeking to achieve through them.”⁴² ICIBI recommended that the Home Office conduct and publish a full evaluation, which the department accepted. By mid-2025, more than five years later, this had not yet been implemented.

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- 3.7** Both earlier inspections looked at the timeliness of AR decisions, since this is fundamental to ARs being an effective remedy, especially where the original application was time sensitive. In 2015-2016, the Home Office was comfortably meeting its declared 28-day service standard for responses, except in a proportion of international cases. The picture in 2019-2020 was broadly similar, though some in-country decisions were falling outside the 28 days, and EUSS and international AR performance fluctuated. In some months, one in four EUSS ARs and one in five international ARs were taking more than 28 days. When challenged, some managers told inspectors that decision quality was more important than meeting the 28-day service standard, although others saw them as equally important.
- 3.8** Poor or wrong AR decisions defeat the purpose of the AR system. However, ‘quality or timeliness’ is a false choice, as ICIBI has pointed out in other inspections. In the case of ARs, protracted processing times fail to meet the letter or the spirit of what was originally promised in the ‘Statement of Intent’ published with the 2014 Immigration Bill. In answer to the question ‘Will there be a time limit for completing an administrative review?’ this stated: “The Home Office will have a service standard of 28 days to complete an administrative review. This is faster than the current average 12 weeks (published statistics for first quarter 2013) it takes for a managed migration appeal to be heard.” While the backlogs and delays within the appeals system have worsened, albeit now concentrated on other more complex routes, this is not an argument for accepting that ARs are taking longer than originally intended.
- 3.9** ICIBI’s current inspection found an AR system that was failing badly on timeliness, except for at-the-border ARs. For applications decided by the ARU in June 2025, average processing times were 836 days for EUSS ARs, 185 days for in-country ARs, and 207 days for international ARs. Since 2021, around 90% of decisions issued by the ARU have taken longer than 28-days, with no sign of this improving.
- 3.10** This is unsurprising as the Home Office abandoned any references to its 28-day service standard on GOV.UK in 2021, replacing it with “likely minimum processing times”. In-country and international AR likely processing times subsequently increased to six months and later to 12 months, and at the time of this inspection, GOV.UK advised that “Currently, it can take 12 months or more to receive the result of the administrative review.” Likely processing times for EUSS ARs increased in stages to 30 months.

⁴¹ For Border Force cancellations additional evidence was also permitted in some circumstances.

⁴² ICIBI, ‘An inspection of Administrative Review’, May–December 2019.

- 3.11** These processing times make a nonsense of the time limits imposed on anyone seeking to make an AR application, which range from seven to 28 days from the decision being challenged. They also fail the ‘justice delayed is justice denied’ test. The delays are a source of frustration for stakeholders. Almost all of those who responded to ICIBI’s call for evidence referred to delays and the impact they were having on applicants, for example, students missing course start dates, workers not being able to take up offers of employment in the UK, and challenges with access to the NHS, and the effect on applicants’ mental and physical health.
- 3.12** In-country and international AR application numbers have trended upwards since 2020-2021, with a noticeable spike in the latter in March 2021 due to the large intake of European Community Association Agreement applications.⁴³ EUSS AR applications peaked in September 2021 and then trended downwards until the right to an AR was removed in April 2024, though ARU continued to receive some invalid EUSS AR applications. Data produced by ARU indicated that, between November 2018 and April 2025, it received a total of 123,593 applications and made 104,783 decisions. The work in progress queue grew significantly between 2021 and 2023, since when it has hovered around 25,000. In July 2025, it stood at 28,193.
- 3.13** ARU managers argued that the only way that backlogs and response times can be reduced is with additional staff. However, their efforts to secure more staff from the Home Office’s periodic recruitment campaigns had been unsuccessful, as other business areas were regarded as a higher priority. Instead, the ARU had fallen back on temporary fixes, taking in agency staff and staff from Customer Services Group’s Flexible Deployment Team, although the return on investment from these short-term additions was unclear when set against the time and effort ARU had to put into training them.
- 3.14** ICIBI formally notified the Home Office of its intention to inspect the AR system in early April 2025. Since that date, ARU had been successful in securing 20 additional staff from the new “Masterclass” recruitment initiative to support people into work who have been long-term unemployed. On completion of onboarding and training, ARU expected this cohort to join the team in August or September 2025. However, recruitment via this method for complex immigration caseworking is largely untested and how it will work for ARU remains to be seen.
- 3.15** Longer-term, there seems little prospect of a permanent increase in ARU resources, especially given the Home Office’s difficult financial position following the government’s 2025 spending review. Therefore, even if it were to make significant in-roads into the current backlog with the help of more temporary reinforcements, it needs to look beyond an increase in staff numbers for ways to stay on top of AR application volumes.
- 3.16** ARU’s efficiency and productivity is not helped by the fact that the IT systems on which it relies are either not configured to support its work or are not ‘fixed’ where ARU identifies ‘technical’ issues. For example, ARU does not have access to the Foreign, Commonwealth & Development Office’s Proviso system, so where it determines that a decision in relation to an application made overseas is incorrect, it has to pass this back to the original DMU to grant an entry clearance, adding significantly to the time it takes for the applicant to receive an outcome. Viewed from the applicant’s perspective, this is unsatisfactory.
- 3.17** Several recent ICIBI inspections have reflected complaints from users of Atlas, the Home Office’s main caseworking system. ARU staff were no exception. ARU had been using Atlas since 2021 and had sought help with a number of issues and ‘bugs’. However, like its staff bids,

⁴³ The European Community Association Agreement allowed Turkish nationals to establish a business or work in the UK under the terms of an EU/Turkey treaty signed in 1963. The route was closed to new applicants on 31 December 2020.

the ARU's IT requirements and change requests appear to have gone to the back of the queue. Some Atlas-related problems meant that AR decisions were on hold for long periods. In such cases, ARU did not inform the applicant that their AR had become stuck or why.

- 3.18** Issues with Atlas also hampered ARU's ability to produce reliable management information (MI) via the Vantage system, which was available to other Home Office teams. By mid-2025, after several unsuccessful attempts, ARU had been waiting over four years for a solution. Meanwhile, it relied on Excel based 'control sheets' to manage workflow and produce data. Inevitably, the use of local spreadsheets resulted in data integrity issues, caused by the large amount of information they sought to capture, poor data standards, and human error. Inspectors were told that if an application was incorrectly logged and "went missing" it was typically only if and when the applicant contacted the department to check on progress that this would be identified.
- 3.19** ARU managers understood the limitations of the control sheets. They were optimistic that a Vantage product would be successfully rolled out within months and hoped to be able to produce data fit for publication by the end of 2025. For now, the control sheets were used to produce the AR data that was shared monthly with Home Office top management and ministers.
- 3.20** The ARU's Workflow Team's efficiency and effectiveness was hampered by having to work with the control sheets, and by the absence of structured triaging and lack of formal prioritisation processes. Some short-term prioritisation (and deprioritisation) of particular cohorts of applicants had been tried, making use of overtime for example, but for the most part, applications were allocated in chronological order according to when they were received, which senior managers described as a fair and consistent approach.
- 3.21** However, it meant that applications that might have been weeded out and dealt with by the Workflow Team, for example, those that were invalid and should be rejected or withdrawn, sat in the queue alongside all the others until it was their turn to be allocated to a DM, inflating the backlog and delaying a response. It also meant that in-country applicants were able to benefit from lengthy periods of s.3C leave triggered by applying for an AR, regardless of the merits of the AR application.
- 3.22** Without a triaging process, ARU is unable to deal effectively and consistently with cases that may require urgent action. Aside from time-sensitive visa applications, an AR application may include a safeguarding issue that means it should be prioritised. As of mid-2025, the ARU was using basic keyword searches to identify possible safeguarding issues, and an informal system of escalation to a senior caseworker. There was no policy or written guidance. Inspectors were told that publishing guidance could lead to its exploitation by applicants. Without published guidance there was little hope of consistency.
- 3.23** Large backlogs in workflow inboxes affected ARU's ability to respond to correspondence and diverted caseworkers from decision making as they re-checked inboxes to chase missing documents. Efforts had been made to reduce the overall backlog to below 10,000 emails, but maintaining this depended on receiving no more than 1,000 new emails a week, over which ARU had no control. Since much of the correspondence concerned delays, the most effective way of reducing emails was to reduce the time taken to decide AR applications.
- 3.24** To ensure consistency, the training materials used by ARU were based on those used to train staff making initial immigration decisions. ARU amended the training materials to include AR-specific content. Following initial training, new ARU caseworkers were mentored by a more

experienced caseworker. Mentoring lasted for approximately four weeks but could increase in duration depending on how long it took for a new caseworker to become fully competent. Caseworkers were happy with the training and mentoring they had received. Feedback from new entrants had been used to improve the delivery and effectiveness of the training, notably fewer PowerPoint-based training sessions, and the incorporation of practical lessons, case studies, and time spent with mentors during the classroom phase of the initial training course.

- 3.25** As part of Customer Services Group (CSG), the ARU is subject to the CSG Quality Assurance Strategy, a mainstay of which is 100% checking of decisions by caseworkers who are not yet signed off as fully competent, together with the checking of a routine sample of decisions by signed off caseworkers. Previously, there was a target of 2% routine sampling for all CSG business areas, but since 2024, business areas have had the flexibility to set different targets based on their risks. CSG's Performance, Assurance, Improvement and Risk (PAIR) team provides second-line assurance. In their last two annual reports, PAIR had given ARU a rating of 'substantial', assessing ARU to have a positive approach to quality assurance (QA) and to be low risk in terms of assurance.
- 3.26** The ARU had retained 2% as its target for routine sampling but had not met it consistently. Managers explained that this was partly due to the demands of 100% checking of new caseworkers, reflecting the high turnover in staff (averaging around 25% a year between 2022 and 2024). Resourcing the 100% checking of new staff has obviously been a challenge, but both elements of the sampling regime are important in setting and maintaining quality standards.
- 3.27** In the first half of 2025, the quality of decisions that had been through ARU's QA process appeared to be declining. Despite this, senior caseworkers were confident about the quality of decisions and the effectiveness of ARU's QA processes in addressing errors.
- 3.28** Inspectors examined a sample of 121 ARs decided by ARU between 1 March 2024 and 31 March 2025. They found that, in most cases, decision quality was good in terms of the AR identifying and correcting caseworking errors. However, almost one in four of the AR decision letters contained spelling and grammatical errors. Along with repetition and lack of clarity, this indicated a lack of attention to detail in AR decision notices. According to the ARU's QA regime, such lapses would not have resulted in a negative quality score (QS3-5), reinforcing ICIBI's view that CSG's approach to quality management needs overhauling.⁴⁴ Regardless of the standard applied elsewhere in CSG, given its role and purpose, ARU should be aiming to produce decision letters that are entirely free of errors.
- 3.29** ARU managers had established good working relationships with colleagues from across the Home Office, attending meetings where policy, guidance, risk, assurance and litigation were discussed. Within the ARU, casework surgeries and one-to-one management sessions were used to share learning and improve performance, while established feedback loops existed between ARU and the original DMUs to encourage improvements in decision making and training in the DMUs.
- 3.30** Nonetheless, learning opportunities were being missed. The absence of reliable MI restricted the ARU's ability to identify relevant judicial reviews and pre-action protocols. Meanwhile, complaints relating to AR applications, many concerning delays, were handled by a central complaints team in UKVI. ARU provided 'lines to take', but these were generic, referring to

⁴⁴ On 3 July 2025, the Independent Chief Inspector wrote to the Second Permanent Secretary at the Home Office on the topic of 'Quality Management across the Migration and Borders System'. In this letter, the Chief Inspector highlighted recommendations in recent inspection reports that related to decision quality and expressed concern that recent updates from the Home Office indicated that the implications of these recommendations had not been considered in the context of the wider Migration and Borders System.

“unprecedented” or “significant increases” in volumes of AR applications. Though this may have been true in 2022-2023, it is misleading to suggest that this is the case now. Stakeholders were critical of generic responses, which did not address specific concerns raised by individuals and did not provide any meaningful updates on when applications would be decided.

Border Force Administrative Review Hub

- 3.31** In contrast to ARU, the Border Force Administrative Review Hub (BF AR Hub) was well resourced to deal with the volume of AR applications it received. Annual intake had fluctuated, having increased from 276 in 2022 to 458 in 2023, before reducing to 237 in 2024. By mid-2025, the indications were that numbers were continuing to fall. The team of three Border Force Higher Officers operated comfortably within the 28-day service standard. Between 2021 and 2025, an average of 95.7% of applications received a response within 28 days.⁴⁵
- 3.32** However, based on the small sample of cases examined by inspectors (5% of decisions made between 1 March 2024 and 31 March 2025) insufficient attention was being paid to decision quality, both in terms of the rationale for the decision itself (in seven out of 11 cases examined) and decision letters, which included spelling, grammatical and other errors. At the beginning of this inspection, the BF AR Hub did not have a formal QA framework in place. While all overturned decisions were reviewed by a Border Force Senior Officer (BFSO), and other decisions were given a ‘second pair of eyes’ check by the BFSO or another Hub team member, the outcomes and any feedback were not recorded. Rejected and withdrawn applications were not subject to any review process. In June 2025, a new assurance strategy was introduced requiring a 10% check of all AR decisions. This came too late for inspectors to test its effectiveness.
- 3.33** The BF AR Hub did not use Vantage for MI due to ongoing technical limitations. It relied on an internal spreadsheet to manage and allocate work, which it considered to be reliable. However, inspectors identified a number of inconsistencies in the recording of data in the spreadsheet. Of more concern, the inspection identified that AR applicant data, including supporting documentation, was being held in a BF AR Hub shared mailbox that was inaccessible to anyone outside of the Hub. This was not in line with advice provided by the Home Office’s Knowledge & Information Management Unit. It was unclear why the Hub had not sought to use the Home Office Platform for Storage, a shared platform for document storage used by other teams.
- 3.34** While there was no formal process of prioritisation, applications where the individual was in detention were prioritised. Hub staff also gave examples of applications that had been prioritised due to concerns over the applicant’s health or deadlines for school examinations.
- 3.35** As well as the quality of decisions made by the BF AR Hub, the inspection raised concerns about whether individuals who are entitled to apply for an AR are made aware of this at ports of entry and, having been made aware, whether they are given sufficient information and time to decide whether to waive their rights. The focus of this inspection was the BF AR Hub, however, in September 2025 ICIBI began a separate inspection of Border Force’s refusals and cancellations of permission to enter the UK, which will look to cover these points. The Hub visited some ports of entry to raise awareness of its work, AR rights and ethical caseworking. It had also attended caseworker forums and contributed articles to the National Immigration Casework Oversight Team, although inspectors had some concerns about the quality of the written articles and the advice being given.

⁴⁵ In its factual accuracy response, the Home Office stated: “At the time of inspection, our busiest intake period had not been realised, historically September onwards produces higher workflow due to student refusal cases.”

Conclusion

- 3.36** This inspection identified a number of inefficiencies within the AR system. Each needs attention, but the focus should be on those that are slowing down decision making by the ARU. The first priority must be to reduce the backlog of applications and get back to a service standard for responses that, if not 28 days, is short enough to make an AR a credible remedy for caseworking errors and a worthwhile option for those who might otherwise make a fresh immigration application.
- 3.37** As a start, the Home Office should commit to a date by which response times for all ARs will not exceed 12 weeks, so that dissatisfied applicants are not in a worse position than before the Immigration Act 2014 changes. Thereafter, rather than a vague “likely minimum processing time”, ARs need a published service standard, or they will remain out of sight of Home Office top management and ministers, and too easily overtaken by the department’s many other priorities.

4. Recommendations

The Home Office should commit to the implementation of the following recommendations by a specific date ensuring that any future proposals to delay their implementation are approved by the Migration and Borders System Board:

Recommendation 1:

Before the end of 2025, implement Recommendation 4 from ‘An inspection of Administrative Review (May–December 2019)’ to:

“Conduct and publish a full evaluation of the Administrative Review (AR) system, baselined against the “Objectives” and “Appraisal (Cost and Benefits)” set out in the 2013 ‘Impact Assessment of Reforming Immigration Appeal Rights’ and other official statements made during the passage of the Immigration Bill 2014, and including:

- a. a list of actions (with owners and timescales) required to deliver what was originally intended;
- b. consideration of potential changes to AR policy and practice, whether overall or specific to certain routes, that would improve the customer experience, including (but not limited to) empowering the AR reviewer to consider fresh evidence, particularly where the eligible decision involved an assessment of the applicant’s credibility.”

Recommendation 2:

Additionally, in respect of Recommendation 1 b) above:

- a. revise the role of the Workflow Team (providing staff with the necessary training and guidance) to incorporate a clearly defined case preparation function, which should include triaging AR applications against an agreed set of priorities and criteria, taking full account of potential safeguarding issues, plus weeding out and responding to invalid applications without involving an Executive Officer caseworker.
- b. provide AR decision makers with access to Proviso or other relevant systems, so that they are able to implement AR decisions in international cases where errors are found, rather than having to refer them back to the original decision-making unit.
- c. conduct a skill set audit to identify the skills and experience required for the different roles within the ARU, taking account of the additional responsibilities recommended above, and including a review of the suitability of the Masterclass cohort as AR caseworkers which can be shared with other Customer Services Group business areas along with any lessons learned from this recruitment initiative.

Recommendation 3:

Commit publicly (on GOV.UK) to restoring the 28-day Customer Service Standard (CSS) for administrative review decisions, or to a revised CSS (no longer than 12 weeks), and specify the date from which this will apply. In support of this, produce a recovery plan for internal Home Office use that is signed off by the Migration and Borders System Board.

Recommendation 4:

Revisit Recommendation 1 a) – c) from ‘An inspection of Administrative Review (May–December 2019)’ below, as a first step in identifying and prioritising any unmet user requirements and ‘fixes’ for the IT systems used to record and process ARs that are necessary to enable the recommended actions to be completed:⁴⁶

“Ensure that all data and information relevant to demonstrating how the Administrative Review (AR) system is working, including related pre-action protocol or judicial review data, is routinely captured and analysed, and used to effect the continuous improvement of both ARs and original immigration decisions.”

Linked to this:

- a. ensure that guidance and instructions to caseworkers (including Border Force officers) responsible for making eligible decisions mandate the minimum recording standards/data requirements in respect of their decisions, actions and reasons/justifications
- b. publish quarterly performance data for ARs, covering as a minimum: the numbers of in-country, overseas, at-the-border and EU Settlement Scheme ARs received; the outcomes (including numbers of ARs declared invalid, with a breakdown of the main reasons); and processing times (having first published the Customer Service Standard
- c. publish (periodically) the details of improvements made to policies, guidance and original decision-making practice as a result of the lessons learned from ARs, first ensuring that feedback mechanisms are effective (timely, specific, and auditable)

Recommendation 5:

Review the current quality assurance regimes for all types of eligible decision, ensuring that, where dip sampling is used, the sample size is based on a full assessment of the risks associated with poor-quality decisions, including the impact on applicants and on the credibility of the AR system as an adequate substitute for the right of appeal. The same considerations should be applied to decision quality scores, where the aim should be to eliminate all errors not just incorrect decisions.⁴⁷

Recommendation 6:

By the end of March 2026, review the impact of the Border Force Administrative Review Hub’s new Quality Assurance Strategy, including its effectiveness in driving improvements to decision quality.

46 This effectively repeated Recommendation 14 from ‘An inspection of the Administrative Review processes introduced following the 2014 Immigration Act’ (September–December 2015).

47 Recommendation 1 d) from ‘An inspection of Administrative Review (May–December 2019)’ was to “review the quality assurance regimes for all types of eligible decision, ensuring that where dip sampling is used the sample size is sufficient to provide a high (≥ 95%) level of confidence, and that where decisions rely on a credibility assessment 100% are quality assured by a manager before the decision is dispatched.” Recommendation 4 above, seeks to achieve a similar level of assurance, but has been updated in light of more recent ICBI findings in relation to quality management across Customer Services Group.

Recommendation 7:

Grant access to the Home Office Platform for Storage (HOPS) to the Border Force Administrative Review Hub and transfer all relevant files/applicant data out of shared mailboxes, ensuring that in future the Hub follows Home Office policy and guidance on the storage of applicant data.

5. Inspection findings: Resourcing

Administrative Review Unit

- 5.1 Except for administrative review (ARs) of decisions to refuse entry to the UK at the border, which are dealt with by Border Force, all other AR applications are processed by the Home Office's Administrative Review Unit (ARU), which is part of the Appeals, Litigation and Administrative Review (ALAR) directorate. ALAR sits within the Customer Operations Support Services command, which is part of the Home Office's Customer Services Group (CSG).⁴⁸
- 5.2 The ARU was established in 2014 and initially processed only in-country AR applications. In September 2018, its remit was expanded to include overseas (international) applications. Two months later, in November 2018, ARU assumed responsibility for processing EU Settlement Scheme (EUSS) AR applications.⁴⁹

Administrative Review Unit staffing

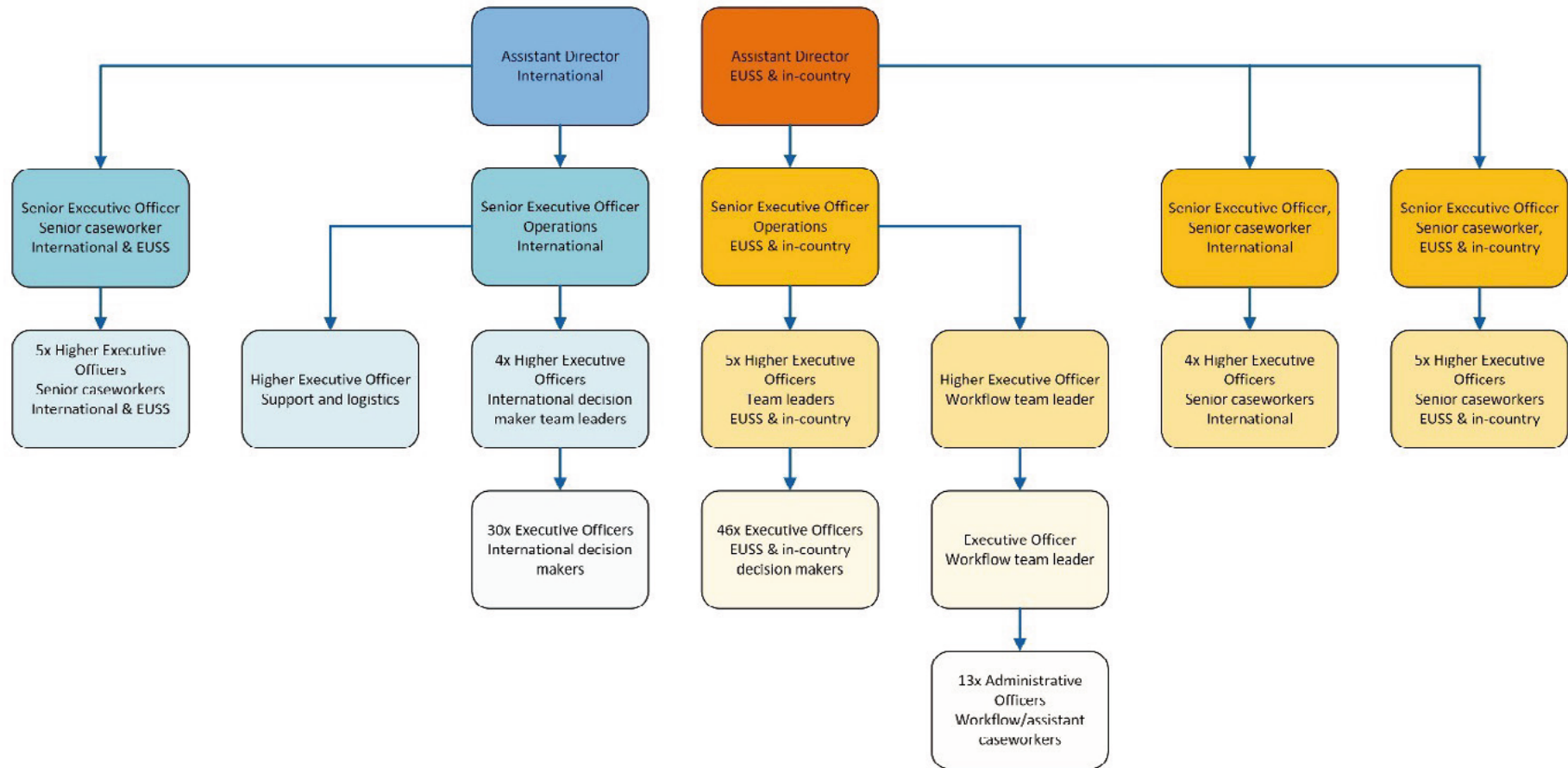
- 5.3 When the ICIBI last inspected the ARU, it had a total of 60 full-time equivalent (FTE) staff (as at 1 May 2019), more than double its original complement. As of 22 July 2025, staff numbers stood at 104.3 FTEs: two Grade 7 managers, supported by 4.8 FTE Senior Executive Officers (SEOs), 22.8 FTE Higher Executive Officers (HEOs), 62.5 Executive Officers (EOs), and 12.2 Administrative Officers (AOs). The biggest increases had been in HEOs (up from 10) and EOs (up from 34 FTEs).⁵⁰
- 5.4 The Home Office provided inspectors with a summary of ARU's structure in March 2025. See Figure 2.

48 In its factual accuracy response, the Home Office stated: "At the time of this inspection, the CSG structure was being revised in light of Directors General changes."

49 ICIBI, 'An inspection of Administrative Review', May–December 2019. While EUSS AR applications are no longer accepted by the Home Office, following changes to the immigration rules, the ARU continues to process applications submitted prior to the change.

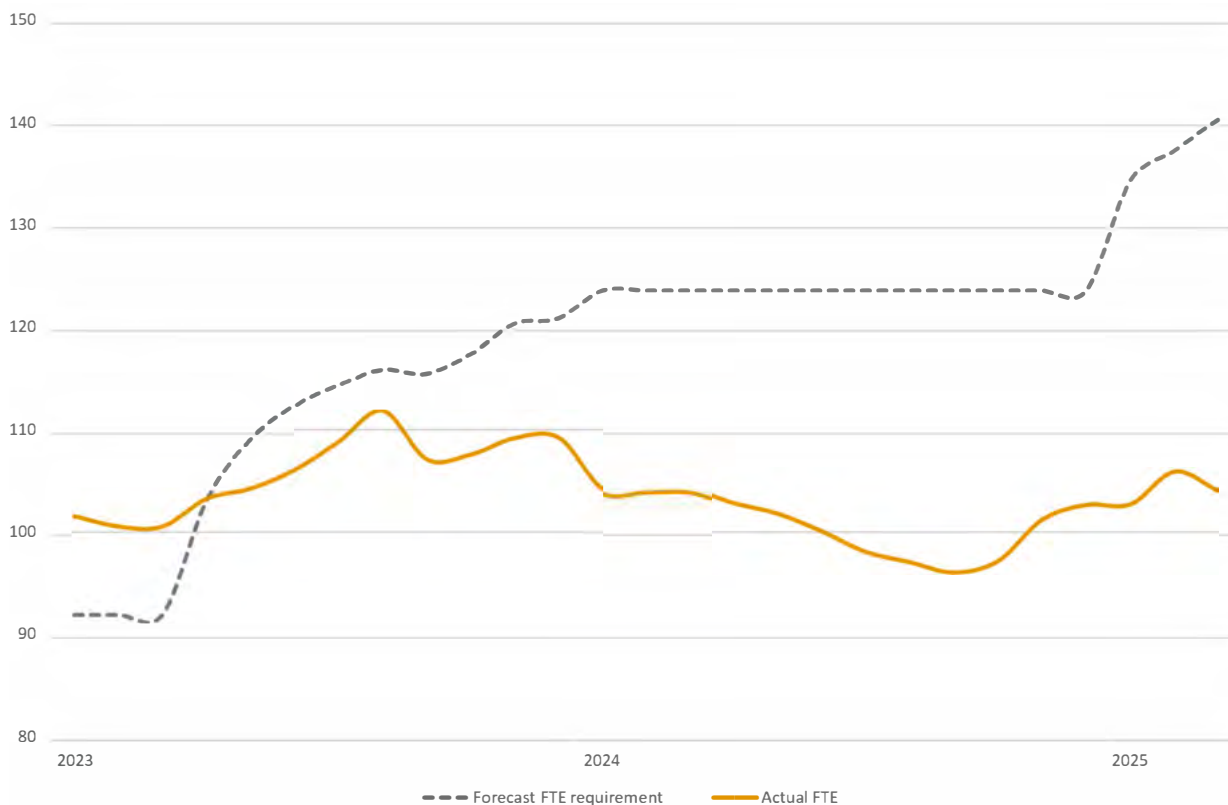
50 FTE is a unit of measurement that represents the equivalent working hours of one full-time employee.

Figure 2: ARU structure, as at March 2025



- 5.5 Senior managers in ARU told inspectors that, since 2022, ARU’s bids for additional staff had been unsuccessful. They believed this was because other Home Office operations, such as asylum casework, were deemed a higher priority.
- 5.6 The Home Office provided inspectors with data for ARU FTEs in post between April 2023 and June 2025, plus the forecast FTE requirement based on staff turnover and AR application volumes over the same period. See Figure 3.

Figure 3: ARU FTEs April 2023 to June 2025 and forecast requirement⁵¹



- 5.7 The data relates to all grades/roles in ARU, but the staffing shortfalls were mostly at the caseworker (EO) level. Inspectors heard in interviews and focus groups that insufficient caseworker capacity had impacted ARU’s operations significantly, leading to application backlogs and wait times exceeding the 28-day service standard. Caseworkers were allocated to one of three workstreams: in-country (14.8 FTE EOs as of July 2025), international (21.6 FTE EOs), and EUSS (26.1 FTE EOs).
- 5.8 One manager said: “We have always been under headcount. We have a constant churn of caseworkers. We lose them quickly but can’t get them in quick enough.”
- 5.9 Inspectors requested details of ARU caseworker ‘wastage’ rates. In response, the Home Office provided data on ‘permanent average caseworker headcount’ and the total number of permanent caseworkers who left ARU in 2022, 2023, 2024 and the first quarter of 2025. See Figure 4.

51 This chart reflects permanent ARU staff only. It does not include the use of Flexible Deployment Team staff between October 2023 and December 2024 and agency staff between September 2024 and June 2025.

Figure 4: ARU caseworker ‘wastage’ rates 2022, 2023, 2024 and 2025 (to 31 March)

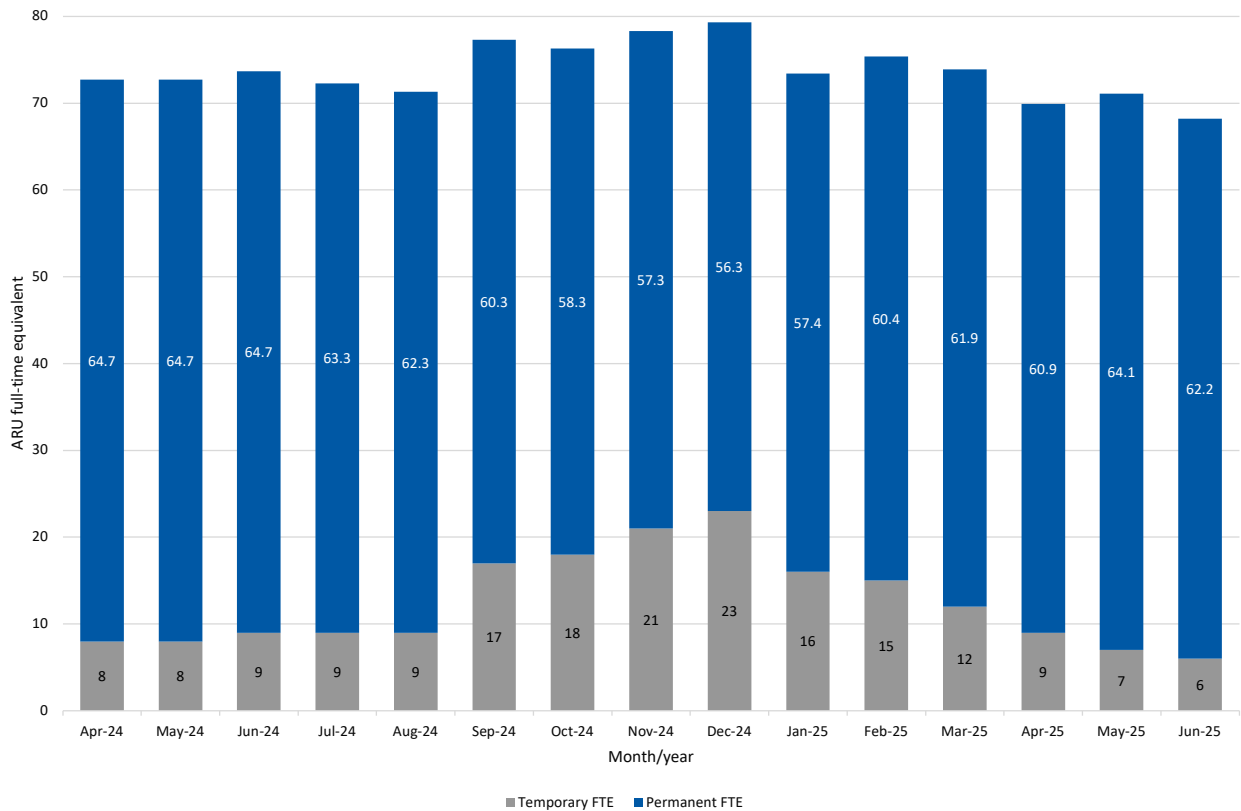
| Year | Permanent average caseworker headcount | Permanent caseworkers leaving ARU | % of casework staff lost |
|--------------------|--|-----------------------------------|--------------------------|
| 2022 | 56.8 | 13 | 22.8% |
| 2023 | 67.6 | 20 | 29.5% |
| 2024 | 67.0 | 16 | 23.8% |
| 2025 (to 31 March) | 61.7 | 1 | 1.62% |

Temporary staff

- 5.10** From 2023, ARU looked to the CSG’s Flexible Deployment Team (FDT) for additional resources after it failed to secure the number of caseworkers it needed from the Home Office’s recruitment campaigns, with newly recruited staff being deployed to higher-priority business areas.⁵² FDT staff supported ARU from October 2023 until December 2024 and a further cohort of 13 was onboarded from 16 June 2025.
- 5.11** In early 2024, the Home Office imposed a department-wide ‘recruitment freeze’. This meant that ARU was unable to appoint any new permanent staff. To mitigate the impact, between September 2024 and January 2025 ARU employed a number of agency staff.
- 5.12** The Home Office provided data for the number of permanent and temporary ARU EO caseworkers each month from April 2024 to June 2025. See Figure 5.

52 The Flexible Deployment Team is a cross-cutting team, providing support to all areas of the Customer Services Group.

Figure 5: Permanent and temporary ARU EO staff numbers by month from April 2024 to June 2025⁵³



- 5.13** ARU caseworkers and managers were positive about the support provided by FDT staff. One manager told inspectors: “The FDT we had last year was a large success, and we are very lucky to have them again.”
- 5.14** However, views about the contribution made by agency staff were mixed. Caseworkers raised concerns that agency staff were not given sufficient information about the roles to which they were being recruited, which led to the appointment of unsuited or unmotivated agency staff. Further issues were raised around the retention of agency workers and the fact that they could leave with minimal notice required. One caseworker described the exercise as “a waste of time”.
- 5.15** In April 2025, the Home Office told inspectors that 16 agency staff had completed induction training. However, seven had had their contract terminated early due to performance or conduct, and three left for other reasons. In June 2025, only six agency staff remained in post.
- 5.16** Because of the short-term nature of their deployments, agency and FDT staff were trained to deal with specific routes. FDT staff were attached to the international AR team and focused primarily on student applications. Agency staff were initially trained on two routes, but this was later reduced to one.

⁵³ The numbers of temporary staff between October and December 2024 reflect the overlap between the end of the FDT deployment and the move to employ agency staff. The Home Office told inspectors that ARU was onboarding 13 FDT staff from 16 June 2025, but these were not reflected in the evidence return used to populate Figure 5.

Permanent staff

- 5.17** For new permanent EO caseworking staff, ARU has been reliant on the periodic ‘brigaded’ recruitment campaigns the Home Office has used to recruit staff into a range of roles across the CSG.
- 5.18** Brigaded campaigns use generic selection criteria and do not provide applicants with a detailed job description of the type of role they will be allocated if successful.⁵⁴ Nor are applicants able to express a preference for a specific role.
- 5.19** In a summary of its recruitment activity between 2021 and 2025, the Home Office acknowledged repeated failures of brigaded campaigns to meet ARU’s staffing needs. These included:
- in 2022, ARU was 25 FTEs below its agreed complement because of delays in the appointment of new caseworkers from a brigaded recruitment process
 - in 2022-2023, ARU received some new caseworkers from brigaded campaigns; there was a shortfall of between four and 21.8 FTEs in the number of new caseworkers delivered against ARU’s staffing bids
 - in 2024-2025, following the “recruitment freeze”, there were issues appointing new ARU caseworkers from a “reserve list” from a previous brigaded campaign. ARU was able to appoint some staff from this reserve list, but the list ‘expired’ in February 2025 before offers could be made to others on the list. This failure was attributed to the greater priority given to asylum caseworking roles offered at the time and was compounded by ARU having to compete for resources with an asylum caseworking unit also based in Salford.
- 5.20** In April 2025, the Home Office provided inspectors with a copy of ALAR’s Risk Register, dated February 2025, which stated that “ARU are inappropriately staffed for demand and are limited on ability to mass-recruit”. The impact, likelihood and proximity was assessed as ‘high’. The date that this risk was originally added to the register was not recorded. The risk was due to a shortfall of 21 FTEs because: “New national bid for increasing asylum DMs [decision makers] has impacted current pull for EOs. Those being offered are arriving slowly and not at rate planned for, and there is no control over new staff due to being restricted to brigaded campaign and WSS [Workforce Service Support] management of the flow of staff. Reserve list now expired, unclear what numbers of staff available elsewhere to fulfil bid.”⁵⁵
- 5.21** In July 2025, inspectors were provided with an updated copy of the Risk Register dated June 2025, which indicated that the impact, likelihood and proximity of this risk remained high, with no change since February 2025. As mitigation, the risk noted the additional 13 FDT caseworkers that were onboarded from 16 June 2025.
- 5.22** Speaking to inspectors, ARU managers raised concerns about the lack of information provided to applicants to brigaded campaigns, which they said impacted staff retention. One manager told inspectors that newly appointed caseworkers did not fully understand the job they were recruited to do, and some had “walked out” when they realised that the job was not “customer facing”.⁵⁶

54 Home Office brigaded campaign job advertisement. <https://careers.homeoffice.gov.uk/news/csg-eo-400-apr23-2>

55 According to the Home Office intranet, the Workforce Service Support Team, which is part of the CSG, is responsible for providing governance and support for resource, recruitment and managing the deployment of flexible resource (including the FDT). The WSS Team is also responsible for large-scale brigaded recruitment campaigns.

56 In its factual accuracy response, the Home Office stated: “Following such feedback, ARU managers set up pre-calls with new starters before start dates to give more information on the role and local arrangements before starting with the unit.”

- 5.23** Managers also raised concerns about their lack of control over the starting dates for new joiners. In some instances, large groups of new recruits arrived over a short period of time, which made it difficult for ARU to deliver training while maintaining business as usual activity.
- 5.24** ARU managers said they would like to have more control over the recruitment process, but they acknowledged that capacity was an issue, and if they were having to manage recruitment campaigns it would have a knock-on effect on operational delivery.
- 5.25** Inspectors put the concerns raised by ARU managers and staff to the central team responsible for recruitment across ALAR. The team was broadly sympathetic and felt that more could be done to improve brigaded campaigns, noting that at present they were unable to track candidates' progress through the process: "We can't clearly see where we are, or how many are in pre-employment checks; that information doesn't come through to us."

Masterclass Recruitment

- 5.26** In April 2025, ARU bid for 20 EO caseworkers through Masterclass Recruitment (MR).⁵⁷
- 5.27** MR is operated by the Ministry of Housing, Communities and Local Government in partnership with employers, including Civil Service departments. The programme offers two weeks of local authority funded face-to-face training delivered by an external contractor. At the end of the training period, delegates are offered an 'informal job discussion' with civil servants, and if deemed suitable, are offered a one-year fixed-term appointment subject to pre-employment checks.
- 5.28** Suitability for referral to the MR programme is determined by external partners, such as the Department for Work and Pensions, local charities or universities. However, the CSG makes the ultimate decision regarding suitability for a role in ARU.
- 5.29** An ARU senior manager confirmed that the two-week Masterclass programme for this cohort finished in June 2025, and it expected the new caseworkers to join ARU in August or September 2025. ARU managers voiced similar concerns to the ones they had about the brigaded campaigns, observing that the job advertisement for MR was "very vague". While the addition of 20 new caseworkers would represent a significant increase in ARU's capacity to decide AR applications, this recruitment model was as yet untested as a way of attracting staff with the skills and qualities required by ARU.
- 5.30** If, after a one-year fixed-term appointment, MR candidates have demonstrated their suitability for the ARU caseworker role, they may be offered a permanent appointment, subject to the availability of a funded post.

Use of overtime

- 5.31** Caseworkers and managers told inspectors that ARU offered overtime to staff, including working at weekends and on public holidays. This has been used to mitigate staff shortages, and to support specific backlog-clearing exercises.

⁵⁷ Masterclass Recruitment was previously known as Bootcamp Recruitment.

- 5.32** A manager told inspectors that ARU had become “a little bit reliant” on overtime for the past two to three years, with some staff opting out of the Working Time Regulations.⁵⁸ Meanwhile, caseworkers told inspectors that some staff had worked seven days a week for multiple weeks through choice.
- 5.33** Overtime incurred an additional cost to the ARU budget, both in terms of the additional hours worked on weekdays and premium time payments at weekends. Inspectors asked the Home Office for a monthly breakdown of the number of hours of paid overtime between June 2024 and June 2025. See Figure 6:

Figure 6: Overtime hours worked by ARU staff between June 2024 and June 2025⁵⁹

| Month | Hours of overtime worked | Hours worked FTE ⁶⁰ | Cost of overtime |
|----------------|--------------------------|--------------------------------|------------------|
| June 2024 | 357 | 2.3 | £23,447 |
| July 2024 | 876 | 5.6 | £30,854 |
| August 2024 | 919 | 5.9 | £22,941 |
| September 2024 | 946 | 6.0 | £32,734 |
| October 2024 | 605 | 3.9 | £29,593 |
| November 2024 | 530 | 3.4 | £24,310 |
| December 2024 | 386 | 2.5 | £17,428 |
| January 2025 | 554 | 3.6 | £21,241 |
| February 2025 | 594 | 3.8 | £20,398 |
| March 2025 | 629 | 4.0 | £20,295 |
| April 2025 | 958 | 6.2 | £19,563 |
| May 2025 | 727 | 4.7 | £23,663 |
| June 2025 | 711 | 4.6 | £21,916 |
| Total | 8,792 | (Average) 4.3 | £308,383 |

- 5.34** Overtime working was inherently more expensive per hour worked. By way of comparison, salary and capitation costs for a national EO in the Home Office amount to £4,208 per calendar month.⁶¹ The sums paid in overtime between June 2024, and June 2025 amounted to an average equivalent cost of 5.6 EO caseworkers per month.

58 Section 4 of the Working Time Regulations 1998 states that an employee’s working time, including overtime, may not exceed an average of 48 hours per week over a reference period. However, an employer may obtain agreement from an employee to work outside of these protections on a voluntary basis. <https://www.legislation.gov.uk/ukxi/1998/1833/regulation/4>

59 Data in this table refers to overtime paid to all grades in ARU.

60 This measure assumes an average of 21 working days in a month, and a working day aligned to Home Office modernised terms and conditions of 7.4 hours.

61 These costs include basic pay, employer national insurance contributions and employer pension contributions.

6. Inspection findings: Information technology systems and data

Home Office systems

6.1 The Home Office provided inspectors with a summary of the main systems used to process administrative review (AR) applications. See Figure 7.

Figure 7: Home Office IT systems used to process AR applications

| | In-country | International | EU Settlement Scheme | At the border |
|--|--|---|---|--|
| AR validation | <ul style="list-style-type: none"> • Atlas⁶² • HOPS⁶³ • Control sheet | <ul style="list-style-type: none"> • CRS⁶⁴ • HOPS • Control sheet | <ul style="list-style-type: none"> • Atlas • HOPS • Control sheet | <ul style="list-style-type: none"> • Atlas • CRS • Shared mailbox • Internal spreadsheet |
| AR consideration | <ul style="list-style-type: none"> • Atlas • HOPS • Control sheet | <ul style="list-style-type: none"> • CRS • HOPS • Control sheet | <ul style="list-style-type: none"> • Atlas • HOPS • PEGA⁶⁵ • Control sheet | <ul style="list-style-type: none"> • Atlas • CRS • Shared mailbox • Internal spreadsheet |
| Record of AR outcome | <ul style="list-style-type: none"> • Atlas • Control sheet | <ul style="list-style-type: none"> • CRS/Proviso • Control sheet | <ul style="list-style-type: none"> • Atlas • Control sheet • PEGA | <ul style="list-style-type: none"> • Atlas • Internal spreadsheet |
| Reconsideration or revised decision post AR | <ul style="list-style-type: none"> • Atlas | <ul style="list-style-type: none"> • Proviso | <ul style="list-style-type: none"> • Atlas | <ul style="list-style-type: none"> • Atlas |

6.2 Prior to the introduction of Atlas, the Administrative Review Unit (ARU) relied on the Case Information Database (CID) to process in-country and EU Settlement Scheme (EUSS) AR applications. In-country applications moved to Atlas from March 2021 and EUSS applications moved from August 2024. Due to technical problems with the Atlas platform, ARU senior managers authorised a contingency measure, allowing a small number of in-country applications to be processed on CID until the system was de-commissioned on 29 April 2025.

62 Atlas is the Home Office's primary immigration casework platform.

63 Home Office Platform for Storage – HOPS is a digital document storage platform, used to store digital copies of supporting evidence submitted by applicants.

64 Central Reference System – CRS allows users to view international visa decisions made on the Foreign, Commonwealth & Development Office's Proviso system. Users can add notes to decision records, but cannot make or amend visa decisions.

65 PEGA is an EUSS caseworking tool and is used by ARU to view EUSS caseworking decisions and supporting evidence. ARU caseworkers may add notes to PEGA to record when an AR is submitted.

- 6.3 Although ARU aspired to transition international ARs over to Atlas, there were no timelines for this to change, and the work had not received funding approval. In July 2025, the Home Office told inspectors that “Earlier in 2025, a board decision was made to pause the overall Atlas overseas programme following the roll-out of Proviso Central”.⁶⁶
- 6.4 Some EUSS and in-country caseworkers told inspectors that they preferred CID, but most were broadly positive about the Atlas caseworking platform when it worked correctly, praising its ease of use and linear, workflow-based approach.

Technical issues with Atlas

- 6.5 ARU caseworking and workflow staff told inspectors about ongoing technical issues or ‘bugs’ with the Atlas system, which often disrupted the decision-making process. In a focus group of in-country decision-making caseworkers, inspectors heard that staff had from six to more than 15 “stuck” cases in their personal workloads due to Atlas bugs. Another caseworker reported that they had to resort to asking an applicant to submit a new application, with an ex gratia refund of the original fee, because there was no way to resolve an ongoing Atlas bug.
- 6.6 ARU had a dedicated team of Atlas specialists who worked to resolve common bugs. In many cases, they were able to find workarounds. Prior to April 2025, ARU had a default process whereby some cases could be transferred to CID as a workaround. ARU’s Risk Register from 28 February 2025 noted that the planned decommissioning of CID could prevent some AR applicants from receiving a decision. The risk was assessed as high both in terms of impact and likelihood. As a mitigation, Atlas developers had begun developing a workaround using a new “generic case” function in Atlas, but at the time of the inspection, this solution remained in early development. Meanwhile, a member of the ARU Atlas team told inspectors that there were cases where individuals had not received a decision because “we can’t tell the system what that decision is.”
- 6.7 When the ARU Atlas team was unable to find a workaround, they sought support from the central Home Office Atlas team. This often meant a delay, in some cases for a few days or weeks, but in some cases for much longer. ARU did not inform the applicant when an AR application was delayed due to an Atlas issue.
- 6.8 In July 2025, the Home Office provided inspectors with a spreadsheet containing details of EUSS and in-country AR applications placed on hold due to Atlas bugs. See Figure 8:

Figure 8: AR applications placed “on hold” due to Atlas bugs⁶⁷

| Workstream | 2021 | 2022 | 2023 | 2024 | 2025 | Total |
|--------------|----------|------------|-----------|------------|-----------|------------|
| In-country | 2 | 58 | 67 | 132 | 46 | 305 |
| EUSS | | 79 | 6 | 3 | 9 | 97 |
| Total | 2 | 137 | 73 | 135 | 55 | 402 |

- 6.9 Figure 9 shows the average number of days from placing an application on hold as a result of an Atlas issue and serving an AR decision. Those applications where no ‘on hold’ date was

⁶⁶ Proviso Central is a new version of Proviso which will allow access to the system outside of the Foreign, Commonwealth & Development Office’s Firecrest network. This may allow units such as ARU remote access in the future.

⁶⁷ Data in this table shows the number of applications on hold due to Atlas bugs by application date. Of these applications, 218 were resolved by July 2025, with 184 outstanding.

recorded have been excluded. The longest time taken was 789 calendar days, the shortest was one day.

Figure 9: Average time taken in calendar days from placing an application on hold due to Atlas issues and serving an AR decision, for applications made 2022 to 2025⁶⁸

| Workstream | 2022 | 2023 | 2024 | 2025 |
|------------|------|------|------|------|
| In-country | 73 | 241 | 120 | 46 |
| EUSS | 95 | 31 | 184 | 59 |

Central Reference System

- 6.10** The Central Reference System (CRS) provided ARU caseworkers with a ‘read only’ view of visa application information held on the Foreign, Commonwealth & Development Office’s Proviso caseworking system.
- 6.11** Because of the restricted functionality of CRS, ARU caseworkers were limited to reviewing the applicant’s personal data, visa application form and any supporting documentation, plus any caseworking notes made by the original decision maker (DM) or other staff in the decision-making unit (DMU). They were able to add notes to the CRS record, but they were not able to substitute a revised immigration decision following an AR, grant leave to applicants, or upload documents to the applicant’s Proviso record. These actions could only be undertaken by staff in the DMU.
- 6.12** In evidence provided to inspectors, the Home Office explained that the ARU recorded notes on CRS so that records of ARU activity were stored with the original visa decision. Caseworkers generated international AR decisions ‘offline’ and sent the decision to the applicant by email from the shared administrative review mailbox.
- 6.13** ARU relied on the DMU uploading the AR decision notice to Proviso, as it had no means of doing so via CRS. Meanwhile, ARU caseworkers would enter a note on CRS to record the AR decision outcome for future reference and upload a copy of the decision notice to the Home Office Platform for Storage (HOPS).
- 6.14** The use of different systems to process and record international AR applications created risks, as illustrated in case study 1.

⁶⁸ This data includes outstanding applications as of July 2025. This data includes outstanding applications as of July 2025. This data excludes applications where no ‘on hold’ date was recorded or was obviously incorrect (181 applications) and data where there were errors such as the decision date being before the application date or the ‘on-hold’ date recorded as ‘yes’ (two applications).

Case study 1: Failure by the decision-making unit to implement the Administrative Review Unit decision

The applicant and their two children applied for an administrative review (AR) of a decision to refuse them dependant visas under the Health and Social Care Skilled Worker route.

The AR was submitted in February 2024, and the applications were allocated to an Administrative Review Unit (ARU) caseworker in September 2024.

The caseworker maintained the original refusal in respect of the main applicant but overturned the decisions in respect of the children. The decision notices sent to the two children stated that the decision was overturned and their visa applications would go back to the original decision-making unit (DMU) for reconsideration. The decision notice did not record the rationale for the decision, but an ARU internal spreadsheet noted: “Evidential Flexibility Should have been Applied/Correctly Explained” and “The ECO [Entry Clearance Officer] failed to request if there were compelling circumstances”. No further details were recorded to explain how the caseworker arrived at this conclusion.

A note made on the Central Reference System (CRS) records of the two children on 30 September 2024 recorded the AR outcome and service of the AR decision notice on the applicants and original DMU via email. The applications remain refused as of July 2025, indicating that reconsideration had not been carried out.

Home Office response

The AR decision to reconsider the children’s applications was forwarded to the DMU on 30 September 2024.

This was recorded as part of caseworking notes (general notes on CRS).

In terms of the processes that are in place to ensure that the DMU/ECO actions overturned decisions:

Email is sent to DMU inbox to notify a reconsideration is required. We [ARU] inform them of the reasons it has been returned for reconsideration. We do not have authority to dictate when they action cases in their WiP, cases will be worked in accordance with their operational practices, and we require an element of detachment to maintain our independence.

If a case is overturned to grant entry clearance, the applicant is informed in their AR decision letter and the DMU will be able to action sooner than a reconsideration to issue an EC [entry clearance].

The step for a DMU to complete the final actions of an AR decision on Proviso is an unwelcome byproduct of awaiting an international AR Atlas service delivery, but ARU do not have the capacity to monitor another business area completing the latter stages. If applicants chase the final actions, ARU will contact the relevant DMU on their behalf.

Management information

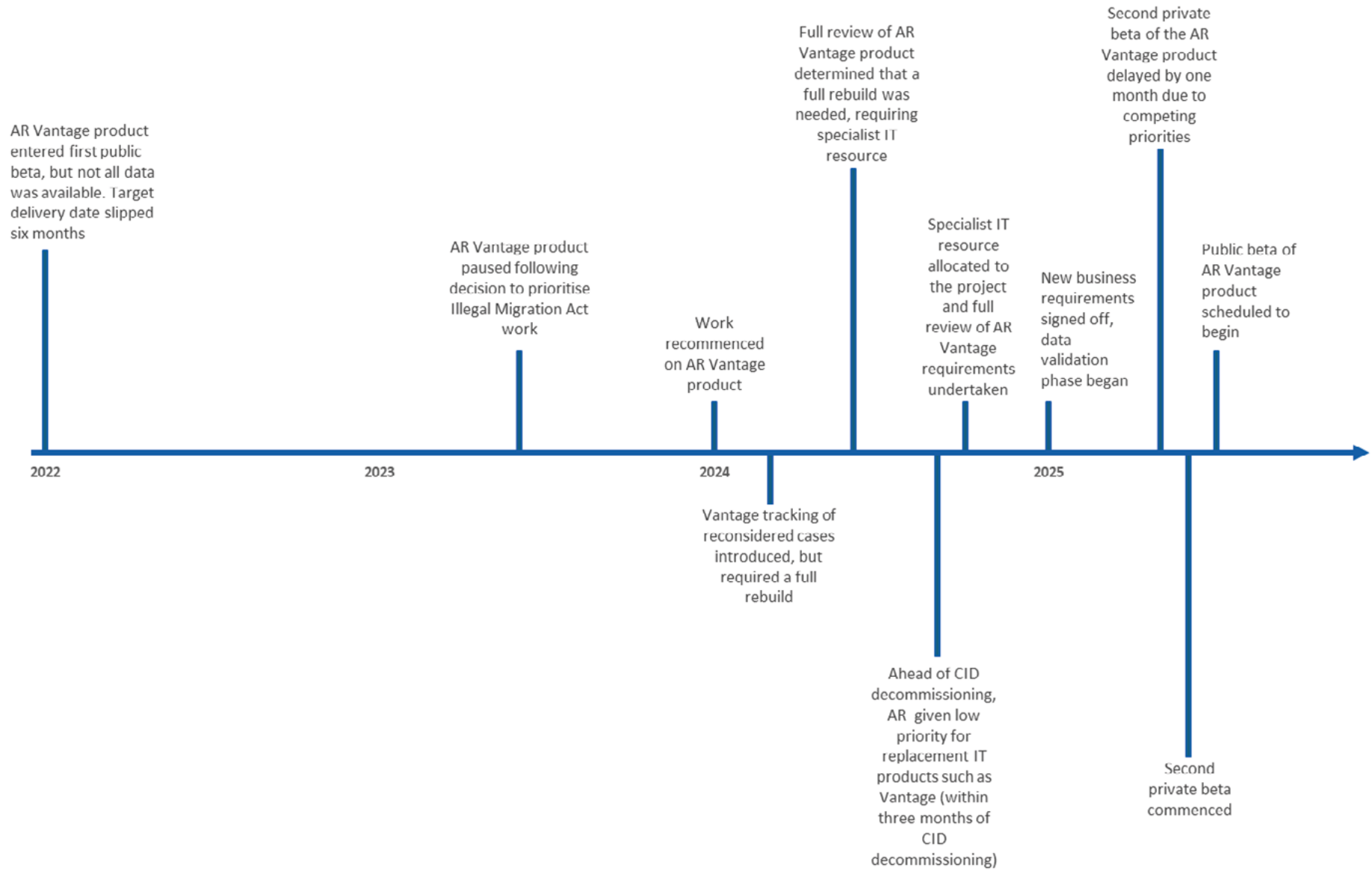
- 6.15** In its 2019 report ‘An inspection of Administrative Reviews’, ICIBI recommended that the Home Office “publish quarterly performance data for Administrative Review (ARs), covering

as a minimum: the numbers of in-country, overseas (international), at-the-border and EU Settlement Scheme ARs received; the outcomes (including numbers of ARs declared invalid, with a breakdown of the main reasons); and processing times (having first published the Customer Service Standard (CSS)).”

- 6.16** The Home Office partially accepted this recommendation, stating that it would “consider the publication of data and service standards on Administrative Review following the full implementation of the Atlas casework database by end of 2021.”
- 6.17** Management information (MI) is drawn from Atlas using a tool called Vantage. A Home Office guide to Vantage explains that it will provide a summary of MI, which will “show a long-term view of patterns and trends to support strategic decision making.” Atlas data is also provided to users via a Daily Operations Dashboard (DOD). The DOD gives real-time workflow information and can be used to assign applications to caseworkers and manage workloads. Reports from Vantage and DOD need to be built for individual business areas, such as ARU.
- 6.18** Although EUSS and in-country AR applications had migrated to Atlas since the 2019 inspection, the Home Office was not yet able to publish AR transparency data, either in full or in part. Home Office staff responsible for Vantage told inspectors that work had been ongoing since 2021 to introduce a viable product to help ARU, but so far without success. An ARU manager commented:
- “With the DOD and the Vantage process – we feel that we are the forgotten child; it’s not made specifically for us. They [the Home Office central Atlas team] just try and tweak a process that is designed for another team.”
- 6.19** In interviews with ARU managers in June 2025, inspectors were told there had been several failed attempts to introduce Vantage in ARU “over the past few years”. However, since autumn 2024, ARU had been working with developers, and they hoped to begin testing a Vantage product in the next few months. The managers were feeling more confident that a product was nearing launch as “it had been given more attention this time round.” A member of the Home Office Performance Reporting and Analysis Unit (PRAU) told inspectors that, by the end of 2025 the Home Office may be in a position to publish some AR transparency data.⁶⁹
- 6.20** In early August 2025, the Home Office reported that a private beta testing phase had been carried out on the ARU Vantage product between 19 June and 3 July 2025 and that “The AR Vantage product is now at the strongest stage it has been since work started on it in 2021.” A public beta testing phase was now planned. The earliest that this could begin was 11 August 2025.
- 6.21** Staff responsible for the development of the AR Vantage product told inspectors that the main difficulties were a lack of resources and constantly changing priorities. One told inspectors that:
- “We need stability of prioritisation – there is constant flip-flopping on priorities. We’ve got to find ways to ringfence capacity. There isn’t sufficient capacity in the existing team to respond.”
- 6.22** The Home Office provided inspectors with a timeline of the actions taken to introduce Vantage in AR since 2022. See Figure 10.

⁶⁹ In its factual accuracy response, the Home Office stated that it was more likely to be in a position to publish some AR transparency data in 2026.

Figure 10: Timeline of the development of the AR Vantage management information product



Control sheets

- 6.23** To mitigate the lack of management information (MI) products, ARU had implemented workarounds in its caseworking processes, creating its own Microsoft Excel spreadsheets, known as ‘control sheets’, which were used both for workflow and for MI.
- 6.24** The control sheets were maintained by a group of Higher Executive Officer (HEO) team leaders who had previous IT experience or enhanced knowledge of Microsoft Excel. This work was done alongside their other responsibilities.
- 6.25** ARU operated separate control sheets for EUSS, in-country, and international AR applications.⁷⁰ On receipt of an AR application, workflow staff manually entered information from the application form onto the relevant control sheet.
- 6.26** As the application progressed through the caseworking process, caseworkers updated the control sheet with details such as case outcomes and decision dates.
- 6.27** The Home Office provided copies of the three control sheets in use by ARU, as at 1 August 2025. Inspectors found the spreadsheets difficult to analyse, due to the volume of data stored. The in-country control sheet contained 36,631 records dating back to 2019, the international control sheet had 73,674 records dating back to 2020, and the EUSS control sheet had 26,970 records dating back to 2020.
- 6.28** Information was not recorded in the same way on the three spreadsheets. Columns were ordered or labelled differently. Each spreadsheet had a large number of blank cells where information had not been recorded, particularly on older applications. It was clear to inspectors that the control sheets had evolved over time, with some information recorded only after a specific date. For example, the validation of international AR applications was not routinely recorded until 2024.
- 6.29** Data quality was poor. The in-country control sheet had 7,969 entries with no application date recorded but with an outcome date, though no details of the actual outcome. Those with outcome dates between 2019 and 2022 contained a lot of empty fields.
- 6.30** Inspectors found other errors in the three control sheets, such as reference numbers recorded in date fields, and actions noted as taking place on dates in 1935, 2005 and 2034.

Use of the control sheets in caseworking operations

- 6.31** Inspectors asked ARU staff about their experience of using the control sheets. Feedback was generally negative. ARU caseworkers told inspectors that the control sheets were slow and prone to crashing. One told inspectors “They are the bane of our lives. They are so slow ... the lag is so bad. They take about ten minutes to open.”
- 6.32** Some ARU caseworkers thought that the control sheets were designed to provide managers with statistical information, rather than to enable smooth and efficient decision making. During focus groups, caseworkers highlighted that there was too much historic data stored in the control sheets, they were “big and unwieldy”, and performance might be improved if this data

⁷⁰ The Home Office told inspectors that “BNO [British National Overseas] and Frontier Worker control sheets were set up separately initially as they were the first routes that were processed solely on Atlas and were not differentiated by in-country or international. From the beginning of the new financial year [2025], these control sheets are to be brought into the in-country control sheet to further simplify statistical reporting and allocation.”

was archived. They had asked for the historic data to be removed to make the control sheets easier to navigate, but managers had refused as they wanted all the data in one place.

- 6.33** However, inspectors saw evidence that ARU had tried to make improvements to the control sheets, for example, by reducing the complexity of formulas to improve their performance.
- 6.34** The managers responsible for the control sheets acknowledged all of the issues identified to inspectors by caseworkers. However, in the absence of a Vantage MI product, they saw the control sheets as the only viable way to provide ARU with historic and current data.
- 6.35** Managers were alive to the risks associated with the control sheets. One told inspectors: “There is a lot of human error. We need to rely on workflow and caseworkers filling it in correctly.” Another said, “Excel is not the problem; the problem is human errors. Someone might not have updated it properly – I make mistakes and so do others.”

Use of control sheets for data reporting

- 6.36** Despite these issues, ARU senior managers told inspectors that they were confident in the accuracy of MI generated from the ARU control sheets, which was “as accurate as it could be”.
- 6.37** The control sheet data was used to produce management data packs, which were shared with Home Office Senior Civil Servants and the Home Office Executive Committee, and monthly statistics updates which were prepared for the Minister for Migration and Citizenship.
- 6.38** Given their findings regarding the control sheets, inspectors questioned the reliability of the data included in these ministerial submissions. A senior manager told inspectors “It is as good as we can provide and goes to the minister with caveats. It is subject to human error and is unverified.”
- 6.39** This data was not subject to any assurance or oversight by PRAU.⁷¹ In fact, PRAU was unaware that it was being sent to the minister until inspectors brought this to their attention during the inspection and expressed some concern that this was happening, and that data was being extracted from internal spreadsheets rather than directly from Home Office systems, such as Atlas. However, based on its previous dealings with ARU, PRAU believed that the MI data generated from the control sheets was generally good. It had broadly matched the MI data generated during Vantage testing.

Data risks

- 6.40** The control sheets are stored on a SharePoint platform. Though accessible only to ARU staff, inspectors had concerns about the large amount of personal data stored on each control sheet, and the risk of compromise if a control sheet were forwarded to a third party via email, accidentally or otherwise. Managers responsible for the control sheets agreed that this was possible but did not consider it a particular risk, observing that any data ARU held on SharePoint could be forwarded in this way.
- 6.41** At the time of the inspection, evidence submitted by an applicant via email to ARU was not immediately uploaded to the HOPS. Evidence, including personal data and special category data, could sit in the ARU inbox for several months until the application was reviewed by a

⁷¹ The Home Office defines PRAU’s primary aim as “Providing high-quality, definitive reporting on and analysis of the performance of the migration and borders mission and its associated operational capabilities to ministers, senior leaders, operational managers and for external audiences.”

caseworker.^{72,73} While this data sat in the ARU inbox, it could be accessed by any member of ARU staff. There was no auditing system to enable the Home Office to see who had accessed data and when.

- 6.42** The Home Office’s Knowledge & Information Management Unit (KIMU) told inspectors that shared mailboxes should not be used as corporate repositories, and information should be moved to an approved system, such as Atlas or HOPS, as soon as possible. As well as the access control risks highlighted above, KIMU told inspectors that data could be inadvertently moved or deleted.
- 6.43** Inspectors raised these concerns with ARU managers responsible for data protection. They acknowledged the risk and told inspectors that they would review their procedures.
- 6.44** Inspectors also had concerns about the length of time the Home Office retained supporting evidence on the HOPS system. At the time of the inspection, there was no process in place to delete personal or special category data from HOPS once an AR was decided and the information was no longer required. In March 2025, ICIBI highlighted the same problem in “An inspection of the Home Office’s management of fee waiver applications”, which found that data, including special category data, was retained on HOPS for several years after a fee waiver decision was made.⁷⁴
- 6.45** Article 5(e) of the General Data Protection Regulation (GDPR) requires that personal data should be retained for so long as it is required to undertake the purpose for which it was obtained. While the regulation does not define a timescale, guidance from the Information Commissioner’s Office suggests that the data controller should periodically review the data that is held and should be able to justify how long data is retained.⁷⁵
- 6.46** Managers responsible for data protection in the ARU told inspectors that supporting information may be required after a decision is made in case of further litigation. The data retention period applied by ARU to application-related information was 25 years.
- 6.47** ARU managers also pointed to the moratorium on the destruction of data in relation to the Independent Inquiry into Child Sexual Abuse.⁷⁶ However, KIMU told inspectors that information supporting AR applications should not be retained under the moratorium, and ARU should dispose of personal data when it no longer has a business need to keep it.

72 Personal data is defined by Article 4 of the UK-GDPR as “means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”. <https://www.legislation.gov.uk/eur/2016/679/article/4>

73 Special category data is defined by Article 9 of the UK-GDPR as “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”. <https://www.legislation.gov.uk/eur/2016/679/article/9>

74 ICIBI, ‘An inspection of the Home Office’s management of fee waiver applications (August 2024–November 2024)’, <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-management-of-fee-waiver-applications-august-2024-november-2024>

75 Information Commissioner’s Office, ‘A guide to the data protection principles – storage limitation’. <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-protection-principles/a-guide-to-the-data-protection-principles/storage-limitation/>

76 During the Independent Inquiry into Child Sexual Abuse, the Home Office imposed a moratorium on the disposal of all business information throughout the Home Office, including all operational records and case files. The Inquiry is now complete, and the moratorium is still in force, but information can be deleted with KIMU approval where “targeted controls are in place”. KIMU guidance states that personal data retained beyond its normal retention period because of the moratorium may not be retained for any purpose other than informing an inquiry or responding to a request from the data subject.

Lack of diversity data

6.48 In the exercise of its functions, the Home Office is obliged under s149 of the Equality Act 2010 to have due regard to:

- eliminate discrimination, harassment, victimisation or other unlawful conduct
- advance equality of opportunity between persons who share relevant protected characteristics and those who do not
- foster good relations between persons who share a relevant protected characteristic and persons who do not

This is commonly referred to as the Public Sector Equality Duty.⁷⁷

6.49 The Home Office captures the protected characteristics commonly recorded in an applicant's identity document at the point of the original immigration application. This information includes the applicant's race (nationality), age (date of birth) and sex. This information is stored in either Atlas or CRS.

6.50 This protected characteristic data is not recorded in ARU's control sheets.⁷⁸ Inspectors therefore asked the Home Office to provide a narrative explanation of the protected characteristic data that was available to ARU managers to inform strategic planning, together with an explanation of how ARU managers identify potential diversity impacts within the AR process. The Home Office responded:

"Data on protected characteristics of AR applicants is not routinely available. Within the AR application form, applicants are asked to provide date of birth, sex and nationality. Manual data entry at the validation stage of the AR process is limited to the fields required for operational management such as date of application and reference numbers. This does not include any of the three characteristics listed above ...

Monitoring for unforeseen diversity impacts is through identification of any trends of concern seen through ARU inbox correspondence or through contributing to complaint responses handled by Central Correspondence Team."

6.51 Inspectors were concerned that the lack of high-level diversity data made it difficult for the Home Office to produce meaningful equality impact assessments and demonstrate compliance with the Public Sector Equality Duty. The Home Office provided inspectors with two equality impact assessments, the first relating to the de-prioritisation of European Community Association Agreement applications, dated 26 April 2021, and the second with the prioritisation of EUSS applications, dated 28 September 2021. Neither was informed by the diversity data of AR applicants sourced from Home Office caseworking systems.

6.52 Reliance on formal complaints to identify potential diversity impacts does not allow ARU managers to identify and eliminate potential diversity impacts at the earliest opportunity. This requires the active monitoring of protective characteristic data. If successful, the Vantage MI system should make it possible to have timely access to this data.

⁷⁷ Schedule 18 of the Equality Act 2010 disapplies the requirement to advance equality of opportunity in the exercise of immigration and nationality functions in relation to the protected characteristics of religion, age and race (nationality and ethnic origin). <https://www.legislation.gov.uk/ukpga/2010/15/schedule/18>

⁷⁸ Nationality data was recorded on the control sheet for some older international applications. In evidence provided to inspectors, the Home Office said, "Nationality is not routinely recorded, but some data exists for international as a legacy from previous data recording."

7. Inspection findings: The Workflow Team

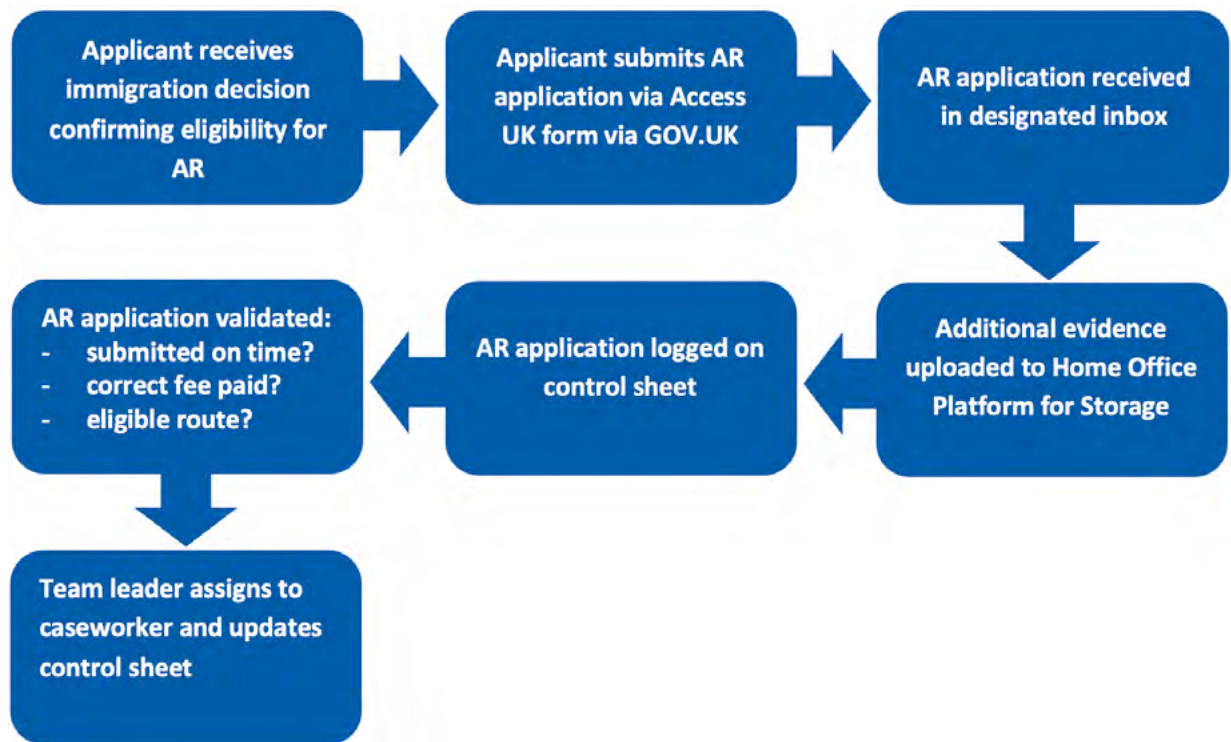
Workflow Team

- 7.1** As of July 2025, the Administrative Review Unit (ARU) had a dedicated Workflow Team to support the caseworking process. The team was overseen by a Higher Executive Officer (HEO) workflow manager, supported by an Executive Officer (EO) team leader, with 12.2 full-time equivalent Administrative Officers (AOs), responsible for workflow functions.
- 7.2** ARU had not experienced resource challenges with the AO grade, and AO staffing levels had remained broadly stable since 2022.
- 7.3** Training for workflow staff was primarily delivered 'on the job', with experienced team members passing on their knowledge to new staff.

Workflow responsibilities

- 7.4** Although workflow AOs were assigned to one workstream, they were trained to cover all three (in-country, international, and EU Settlement Scheme (EUSS)) to ensure flexibility and resilience in the system.
- 7.5** The core responsibilities of the Workflow Team included logging new applications, conducting validity checks, managing inbox correspondence, and uploading documentation to relevant IT systems. Administrative review (AR) applications were received via four dedicated inboxes, corresponding to the three workstreams, and a separate inbox for any fee exemption applications.
- 7.6** The Workflow Team recorded all new ARs on the relevant control sheet and checked whether they met the criteria for an AR. The checking process included confirming that the application was submitted within the permitted timeframe, that the correct fee had been paid, and that the immigration route was eligible for an AR. Figure 11 shows the processes carried out by the Workflow Team.

Figure 11: Workflow process map following receipt of a new AR application



Workflow task allocation

- 7.7** New applications were evenly assigned across the Workflow Team by AOs for validation and processing. The internal target for completing validation was one working day, and AOs were expected to complete between five and six validations per hour, depending on the complexity of the application.
- 7.8** The Home Office provided data to show its performance against the one working day validation target between 2021 and 2025. See Figure 12.

Figure 12: Home Office performance against one working day validation target⁷⁹

| Status | 2021 | 2022 | 2023 | 2024 | 2025 |
|-------------------------------------|--------|--------|--------|--------|--------|
| Not validated in one day | 11.12% | 17.45% | 5.07% | 55.55% | 23.46% |
| Validated in one day | 14.94% | 41.24% | 38.00% | 42.07% | 76.24% |
| Validation date not recorded | 73.95% | 41.31% | 56.93% | 2.38% | 0.30% |

- 7.9** The data shows a significant improvement in meeting the one working day target in 2025, as well as an improvement in capturing application data since 2024.

Quality assurance checks

- 7.10** While productivity targets were in place for workflow staff, quality assurance checks were limited. During the initial stages of training, ‘dip sampling’ was used to check that validations were completed correctly. Once staff were considered trained, there was little ongoing

⁷⁹ Data on Figure 12 excludes records on the ARU control sheet with no application date recorded (8,388 applications) and applications where the recorded validation date was before the application date (132 applications). The validation data for international cases was not recorded prior to 2024.

oversight from Workflow Team managers. An ARU manager told inspectors that quality issues were identified by EO caseworkers and fed back to the Workflow Team HEO.

Invalid applications

- 7.11** Workflow AOs were not empowered to reject or withdraw invalid applications. Rejections and withdrawals were decided by EO caseworkers. In many cases the reasons were straightforward and clear (out of time, ineligible route, failure to pay the fee) and did not require a full review by the caseworker, one of whom described such decisions as “a five-minute job”.
- 7.12** Both Workflow Team staff and ARU caseworkers queried whether the former should be allowed to reject or withdraw certain types of invalid applications. Inspectors put this to ARU managers. The managers said they would like to look at rejecting applications at the workflow stage, but it would be difficult for several reasons, including concerns about a potential conflict with a previous ICIBI recommendation regarding the grading of decision makers as EOs rather than AOs.⁸⁰
- 7.13** ARU managers said that safeguarding was also a factor, as rejecting an AR may act as a trigger for someone at risk of self-harm or with suicidal ideation, which AOs were not trained to deal with. They also felt that it would be difficult to reject EUSS applications at the workflow stage, because the route has been designed to weight decisions in favour of the applicant, and it may be necessary for AR caseworkers to write to the applicant for additional information.

Linked applications

- 7.14** The sample of 121 ARU files examined by inspectors identified that individuals with linked applications, where the main applicant had an accompanying spouse or children, for example, were recorded on separate lines on the relevant control sheet, but with the same Unique Application Number (UAN). AR decisions were made for the main applicant and a single decision notice served, which included the dependants. Meanwhile, the dependants’ applications were entered as ‘rejected’ on the control sheet, even though they were considered substantively on the main applicant’s application. The Home Office told inspectors that this was to record the outcome for each submitted AR applicant.⁸¹
- 7.15** Where dependants who qualified to be considered in line with the main applicant had submitted separate AR applications, and paid the £80 fee, ARU made two control sheet entries for each dependant, one using the same UAN as the main applicant, to ensure that family groups were allocated to the same caseworker, and one with its own UAN, so that the fees could be refunded for these ‘invalid’ applications.
- 7.16** Therefore, where the Home Office had received three AR applications from a main applicant and two dependants who were entitled to be included on the main applicant’s AR application, this would be recorded as five lines on the control sheet:
- the main applicant’s application
 - the two dependants recorded under the main applicant’s UAN and shown as ‘rejected’, and

⁸⁰ In 2016, in ‘An inspection of Administrative Review’, the ICIBI recommended that the Home Office review its grading structure. This recommendation did not direct the Home Office to grade AR decision makers at EO grade.

⁸¹ In accordance with section AR2.11 of Immigration Rules Appendix AR, a dependant may be included on a main applicant’s AR application if they were named on the original immigration application or submitted a separate visa application as a dependant on the same day as the main applicant.

- the two dependants' separate applications each recorded under their own UAN and shown as 'invalid'

7.17 Inspectors considered that recording applications in this way risked distorting ARU's management information, misrepresenting the true number of rejected applications, for example.

Use of control sheets for workflow

7.18 The Workflow Team used the control sheets to allocate and track applications. Workflow staff expressed concerns about the control sheets, particularly around the loss of AR application data. One AO reported that five international ARs had "disappeared" from the control sheet within a two-week period. Another told inspectors that, when they realised that an application was "missing" they "quietly re-entered the information back onto the system".

7.19 Missing applications were typically discovered only when applicants contacted the Home Office to chase progress on their AR, which could be many months after they had applied. Workflow staff told inspectors they were quick to respond when an AR was identified as missing, but missing ARs might remain unnoticed if the applicant did not ask for a progress update.

7.20 Managers were aware of the risk of missing AR applications and highlighted to inspectors that the control sheets were "old" and "outdated", though "better than they used to be". They believed it was "rare" for cases to go missing, but no records were kept of applications identified as having been missing, so they were not able to say how often this occurred.

7.21 As well as delaying consideration of an application, missing applications created extra work for the Workflow Team, in checking, recovering, and re-logging applications.

7.22 In August 2025, following the onsite phase of this inspection, ARU managers undertook a search of records to determine the number of missing applications identified by ARU in the previous two years. The Home Office reported that "approximately 16" applications had been identified as "missing", and corrective actions taken. This number was much smaller than inspectors understood from comments by ARU staff onsite about the frequency with which missing applications were identified.

Workflow inboxes and backlogs

7.23 The Workflow Team was responsible for managing the inboxes that received AR applications and related correspondence. Staff were expected to handle approximately ten emails per hour.

7.24 As of June 2025, there were significant backlogs in the in-country and international AR inboxes, which affected both the timeliness of responses and the ability of the team to identify and act on any urgent issues.

7.25 Workflow staff described the situation as "highly pressured". One member of the Workflow Team told inspectors "We are chasing our tails."

Scale and variation of email backlogs

7.26 The in-country inboxes each held approximately 4,000 emails, while the EUSS inbox contained only 24, reflecting the closure of the route to new AR applications on 4 April 2024, and reduced correspondence.

- 7.27** As of June 2025, the oldest unactioned email dated back to late January 2025 in the in-country inbox, February 2025 in the international inbox, and June 2025 in the EUSS inbox.
- 7.28** There had been considerable improvements in tackling the volumes of emails, which had exceeded 12,000 in the international inbox in the first half of 2024. Workflow staff told inspectors that an internal target to reduce the overall total in the three inboxes to below 10,000 had been met. To maintain this, they were reliant on receiving no more than 1,000 emails per week.
- 7.29** In interviews and focus groups AOs told inspectors that the volume of ARs and associated validation tasks limited their capacity to focus on the correspondence in their inboxes. They suggested that partial or full automation of the validation process could free up time for correspondence.
- 7.30** Meanwhile, one of the most consistent concerns raised by ARU caseworkers was that applications were not “decision ready” by the time they reached them. Caseworkers described having to chase missing documents and re-check inboxes for correspondence that had not yet been actioned. These tasks diverted them from making decisions and contributed to delays.

Application allocation process

- 7.31** At the time of inspection, ARU operated without a formal system for prioritising or triaging applications. All applications were processed in the order they were received, regardless of complexity, and with no attempt to assess the urgency or the potential impact on the applicant.
- 7.32** While the Workflow Team managed the inboxes through which applications were received and carried out initial validation checks, it had no role in assigning cases to caseworkers or overseeing work in progress. AR applications were allocated to caseworkers by team leaders within the caseworking teams.
- 7.33** Allocation practices varied between the three workstreams. In the EUSS workstream, caseworkers requested new applications from their line managers when they were ready to take on new work. Team leaders took account of the ‘case stage’ when allocating applications in order to match application complexity with caseworker capability. ‘Stage one’ cases were straightforward residence-based refusals, often involving clear family relationships (for example, children, spouse, partners). ‘Stage two’ were moderately complex cases involving retained rights, complex relationships, or joining family members. ‘Stage three’ were complex derivative routes, such as paper-based applications under legal precedents like Zambrano, Chen, and Ibrahim/Teixeria.^{82,83}
- 7.34** In the in-country workstream, caseworkers also requested applications from team leaders, typically at the start of the day. They managed their own workload and could ask for more straightforward applications if they had a lot of outstanding complex queries.
- 7.35** In contrast, caseworkers in the international workstream did not request applications; team leaders allocated them directly.

⁸² A Zambrano ‘right to reside’ is derived from wider EU law rather than from the Free Movement Directive 2004/38/EC, [EU Settlement Scheme person with a Zambrano right to reside.docx](#).

⁸³ Chen primary carers and their dependants under the age of 18 and ‘Ibrahim and Teixeira’ children, primary carers and those carers’ dependants under the age of 18 may be considered under derivative rights to reside. <https://www.gov.uk/government/publications/eu-settlement-scheme-caseworker-guidance>

Chronological allocation

- 7.36** Managers in ARU told inspectors that dealing with cases in date order was the “fairest” way to manage competing demands across over 30 immigration routes.
- 7.37** There was no formal policy or defined criteria for prioritising AR applications. Where a request was made by an applicant or their representative to expedite a decision, it would be referred to an HEO senior caseworker (SCW) to assess if it should be put to the ‘front of the queue’. Managers in ARU recognised the need for fairness, given that most applicants had to wait a long time for a decision, but believed this had to be balanced against being able to respond urgently when necessary, for example, in the case of serious illness or where there were safeguarding concerns.
- 7.38** In practice, the absence of formal guidance meant that prioritisation decisions were discretionary and could vary depending on how concerns were raised and who reviewed the case.

Delays in rejecting invalid applications

- 7.39** A considerable proportion of AR applications were rejected or withdrawn. Data provided by the Home Office in August 2025 showed that the percentage of rejected and withdrawn applications had increased year on year, from 23.13% of all applications in 2021 to 35.5% in the first six months of 2025.
- 7.40** Rejections were often straightforward to resolve and did not require a full caseworker review, for example, where the AR application was submitted out of time, or for an ineligible route, or where the fee had not been paid. Such applications should have been marked as invalid by the Workflow Team. Nonetheless, they still joined the queue of applications to be allocated to a caseworker. In the absence of a triage system, they waited their turn to be considered. See case study 2.

Case study 2: Earlier resolution of invalid applications

In December 2023, an applicant sought an administrative review of a decision to refuse them leave to remain under Appendix Family Member.

The application was checked by the Workflow Team on the day of receipt and found to be invalid, as decisions in relation to this immigration route are not eligible for administrative review.

Two months later, in February 2024, the application was allocated to an EO caseworker. Following assessment by the caseworker in early March 2024, the application was submitted for quality assurance. The application was not selected for routine sampling, and the decision was returned to the caseworker who concluded their action and served the decision notice.

ICIBI comment

This was a straightforward case of an AR submitted for an ineligible route. Although the ARU Workflow Team identified that the application was invalid on the day it was received, it took three months to notify the applicant that their AR application had been rejected.

Home Office response

The aim is to allocate rejections as quickly as possible to ensure applicants receive a refund when an invalid application is submitted. This case was concluded faster than other substantive cases received at similar times, nevertheless with an increase in invalid intake and the volumes of substantive decisions to still allocate, it reflects the operational position that it did take three months to conclude this case.

Delays in withdrawing applications

- 7.41** AR applications submitted under Appendix AR of the Immigration Rules are deemed to be withdrawn if the applicant submits a further application for leave to enter, leave to remain or entry clearance.⁸⁴ In-country applications submitted under Appendix AR are deemed to be withdrawn if the applicant leaves the UK.
- 7.42** Workflow staff did not routinely check whether an application had been withdrawn unless prompted by applicant emails. Caseworkers described this as a “missed opportunity”, noting that a more proactive approach could ensure more efficient management of workloads.
- 7.43** There was no automated system for identifying an application that may fall to be withdrawn. These were only actioned if a request for withdrawal email was received from the applicant or if a caseworker happened to notice a withdrawal note on the case file. Additionally, exit data (information collected when an individual exits the UK) was not readily available to support automatic withdrawal decisions. If a new immigration application had been submitted after the initial validation check, it may not be identified until the case was allocated to a caseworker. An example of this is highlighted in case study 3.

⁸⁴ Section AR 2.16 of Immigration Rules Appendix AR provides that, where an applicant has a right of AR from an eligible immigration decision, that right is invalidated where the applicant makes a subsequent application for entry clearance, permission to enter or permission to stay.

Case study 3: Earlier resolution of invalid applications

The applicant applied for an AR of a decision to refuse their application for an entry clearance under the European Community Association Agreement.

The AR was submitted in June 2021 and was validated by the Workflow Team within one day.

The application was allocated to an ARU caseworker in August 2024, some 1,160 days later.

The caseworker identified through a check on the Central Reference System that the applicant had made a fresh entry clearance application in August 2023. The AR application was therefore deemed to have been withdrawn.

An AR decision notice was sent to the applicant five days after the application was allocated to the caseworker.

ICIBI comment

The Home Office did not identify that this application fell to be withdrawn for 372 days after the applicant had made a fresh entry clearance application, resulting in the AR application sitting in the WiP queue more than a year.

Home Office response

At the time the fresh entry clearance was made the international WiP stood at 10,630 cases. There were insufficient resources to carry out regular individual checks on these volumes to identify new applications.

- 7.44** Workflow Team AOs and caseworkers expressed support for a more structured triage system to identify and resolve straightforward cases more quickly. Suggestions included using control sheets to track potential withdrawals and developing standard templates for common rejection scenarios. A senior manager told inspectors: “If you have paid a fee and expect a service, it is not okay that we sit on that,” and confirmed that efforts had been made to prioritise rejections in the European Community Association Agreement and EUSS workstreams in 2024. (See chapter 8.)

Safeguarding

Identifying safeguarding concerns

- 7.45** The backlog of applications and correspondence, and the methods used to manage them had direct implications for the identification of safeguarding concerns.
- 7.46** Inspectors found that there was no formal system in place to ensure that correspondence which touched on safeguarding issues was quickly identified and acted on. As a workaround, management had implemented a process whereby workflow staff conducted daily keyword searches of the AR inboxes to try to identify any cases where there were potential safeguarding risks.
- 7.47** Staff used words such as ‘suicide’, ‘expedite’, ‘police’, ‘social services’ in their searches. They also included references to withdrawal requests and potential litigation, such as pre-action protocol or judicial review, which may contain safeguarding elements.
- 7.48** This approach had clear limitations. The search words used were not a comprehensive list of possible indicators of distress, and did not include other common terms, such as ‘depression’

or 'hopelessness' for example. Nor would a simple word search necessarily discern whether the overall tone and substance of an email and its attachments suggested a safeguarding issue.

- 7.49** ARU staff at all levels acknowledged that this approach was imperfect and carried risks, particularly when large volumes of emails remained unread. A senior manager described keyword searching as “the best we can do” under the circumstances but recognised that it was a temporary workaround rather than a long-term solution.
- 7.50** Workflow staff described making judgement calls about whether to escalate an application because of potential safeguarding issues. They told inspectors: “The key is not to second-guess it – if you think it may be safeguarding, you refer it to the safeguarding officer and leave it to someone who is fully trained” to make the final decision. Once a concern was identified, it was forwarded by the AOs to an SCW for review. It was for the SCW to determine if it should be prioritised.
- 7.51** Inspectors noted that there was no formal policy or written guidance outlining the criteria for escalation. SCWs described the process as “deliberately informal”, explaining that formalising it or publishing clear guidance could make it vulnerable to exploitation by applicants. However, examples of applications that had been referred to a SCW included where there were concerns relating to homelessness and to financial hardship.
- 7.52** Caseworkers told inspectors that they were unsure whether AOs consistently reviewed all parts of an AR application for safeguarding concerns. Specifically, they questioned whether the reasons for the AR application were checked only within the application form itself or also within the supporting documents, which could affect whether concerns were picked up.
- 7.53** SCWs told inspectors that identifying safeguarding issues often required reviewing the full application history, which was time-consuming and not always feasible at initial stages of the application process.

Workflow culture

- 7.54** ARU staff at all grades described the Workflow Team as essential to the functioning of the unit. One caseworker called them “the backbone of the office”, while team leaders said, “we could not run without them”.
- 7.55** In focus groups, Workflow Team AOs told inspectors that they had positive relationships with their immediate and senior managers and were comfortable approaching them for advice. Overall, they felt supported, and reported that they received recognition for their work. Similarly, the managers described the team as proactive and engaged and referred to their willingness to work flexibly across the different workstreams.
- 7.56** Regular communication was supported through twice-weekly workflow meetings, which were attended by all of the Workflow Team and used to discuss operational issues and share updates. These meetings were described as open and constructive, providing a forum for raising concerns and maintaining awareness of developments across the ARU.

8. Inspection findings: Work in progress and timeliness of decision making

The work in progress queue

- 8.1** Once the Workflow Team has completed the validation process, applications are placed in the work in progress (WiP) queue by recording the application on the Administrative Review Unit (ARU) control sheets, pending allocation of the application to a caseworker by a Higher Executive Officer (HEO) team leader. At the time of the inspection, ARU had separate WiPs for in-country, international, and EU Settlement Scheme (EUSS) applications.
- 8.2** ARU previously maintained a fourth WiP, within the international administrative review (AR) workstream, for European Community Association Agreement (ECAA) applications. This was due to the high volume of applications received from this route. This WiP was closed in December 2024.

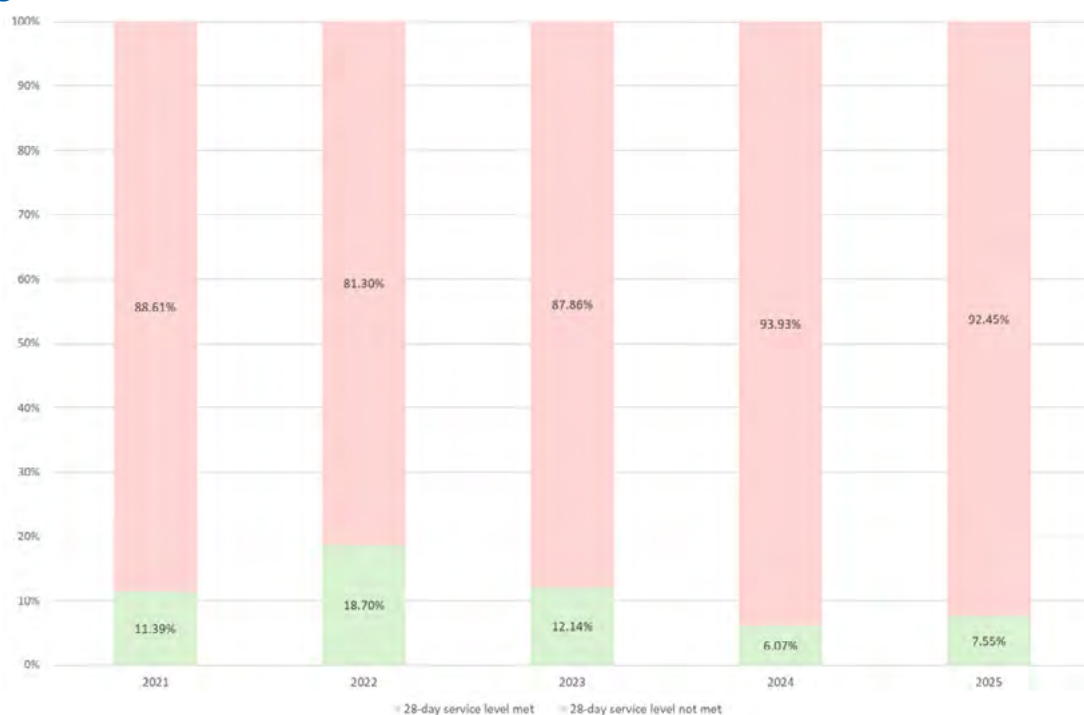
Service standards

- 8.3** In December 2013, the then Immigration Minister published a factsheet which stated: “The service standard will be to complete Administrative Review within 28 days, substantially quicker than the current average of 12 weeks for an equivalent appeal to be resolved.”⁸⁵
- 8.4** The ICIBI’s initial inspection of the post-Immigration Act 2014 AR system, completed in December 2015, examined whether ARs were being concluded with the 28-day service standard after a first full year of operation. It found that in-country ARs were being managed “comfortably within” the 28 days, as were “over 80% of overseas ARs”.⁸⁶ Performance levels were broadly the same when the ICIBI carried out a further inspection of the AR system in late 2019, at which time 73% of EUSS ARs were being completed within 28 days (down from 94% earlier that year). ARU senior managers told the 2019 inspection team “[we] can’t slip on service delivery and can’t slip on quality” as “both are equally as important”, but they were not going to send out “rubbish” decisions just to stay within the 28-day service standard.
- 8.5** Data provided to inspectors by the Home Office in July 2025 indicated that, with the exception of some invalid applications, all three ARU workstreams had been operating significantly outside of the 28-day service standard since 2021. See Figure 13.

⁸⁵ Home Office, ‘Immigration Bill 2014 , Factsheet: Appeals (clauses 11-13)’ https://assets.publishing.service.gov.uk/media/5a7c5265ed915d3d0e87b98a/Factsheet_05_-_Appeals.pdf

⁸⁶ The 2015 inspection also found that at-the-border ARs were being managed comfortably within the 28 days. The inspection preceded the creation of the EU Settlement Scheme.

Figure 13: ARU performance against the 28-day service standard, 2021 to July 2025⁸⁷



8.6 In interviews with inspectors, managers confirmed that they had not met the service standard since 2020-2021. One described 28-days as an “internal service standard” which had been a reasonable expectation when ARU was first established, but “realistically, it’s now 12 months.” They said that a return to a 28-day service standard would be possible only with additional staff.

GOV.UK messaging

8.7 In 2021, the Home Office replaced references to the 28-day service standard for ARs on GOV.UK with “likely minimum processing times”. These varied depending on the route. For in-country and international AR applications, the time quoted was 12 months.^{88,89,90,91} For EUSS applications, it was 30 months.^{92,93}

8.8 Inspectors noted that since the 2019 ICIBI inspection, AR processing times published on GOV.UK had been revised several times. A summary of the changes since 2021 is shown in Figure 14.

⁸⁷ This data is calculated using ARU’s control sheets and excludes records where an application date and/or decision date is not recorded. As at July 2025, 27,337 had no outcome recorded across all workstreams. In the in-country workstream 8,388 applications had no application date recorded, 8,383 of which were decided prior to 2023.

⁸⁸ GOV.UK included ARs for “frontier workers” under the 12 months likely minimum processing time, while it indicated a likely 18 month wait for an AR for a Service Providers from Switzerland [see: <https://www.gov.uk/guidance/apply-for-a-service-providers-from-switzerland-visa>] visa refusal. A Frontier Worker permit allows nationals of the EU, Norway, Iceland and Liechtenstein to work in the UK if they live in another country, provided they began working in the UK prior to 31 December 2020. A Service Provider from Switzerland visa allows non-UK nationals employed by a company based in Switzerland to work on a contract in the UK.

⁸⁹ GOV.UK, ‘Ask for a visa administrative review: If you’re in the UK’ <https://webarchive.nationalarchives.gov.uk/ukgwa/20250716193739/https://www.gov.uk/ask-for-a-visa-administrative-review/if-youre-in-the-uk>

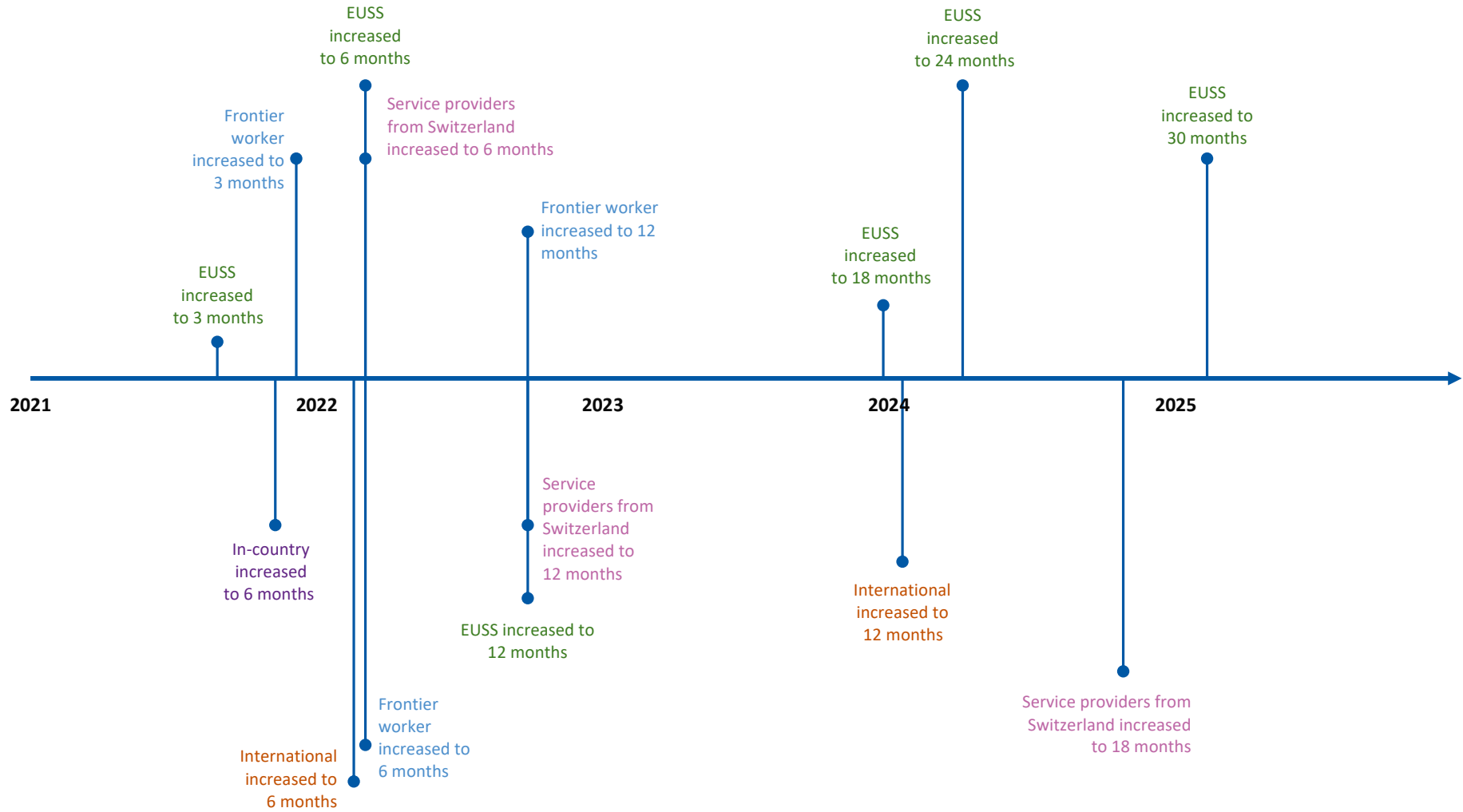
⁹⁰ GOV.UK, ‘Ask for a visa administrative review: If you’re outside the UK’ <https://webarchive.nationalarchives.gov.uk/ukgwa/20250716164833/https://www.gov.uk/ask-for-a-visa-administrative-review>

⁹¹ GOV.UK, ‘Frontier Workers: apply for a review of your Frontier Worker permit decision’ <https://webarchive.nationalarchives.gov.uk/ukgwa/20250716193958/https://www.gov.uk/guidance/frontier-workers-apply-for-a-review-of-your-frontier-worker-permit-decision>

⁹² GOV.UK, ‘Guidance: Service Providers from Switzerland: apply for a review of a decision about your right to enter the UK’ <https://webarchive.nationalarchives.gov.uk/ukgwa/20250716193609/https://www.gov.uk/guidance/service-providers-from-switzerland-apply-for-a-review-of-a-decision-on-your-visa-application>

⁹³ GOV.UK, ‘Guidance: EU Settlement Scheme: administrative review’ <https://webarchive.nationalarchives.gov.uk/ukgwa/20250716190720/https://www.gov.uk/guidance/eu-settlement-scheme-apply-for-an-administrative-review>

Figure 14: Changes to stated processing times for AR applications between 2021 and 2025



Caseworker targets

8.9 Executive Officer (EO) caseworkers in ARU had daily targets for the number of applications they were expected to process. See Figure 15.

Figure 15: ARU quantitative targets, as at July 2025

| Workstream | Daily target | Weekly equivalent ⁹⁴ |
|----------------------|------------------------------|---------------------------------|
| EUSS | 1.6 applications | 8 applications |
| In-country | 1.8 applications | 9 applications |
| International | 3 applications ⁹⁵ | 15 applications |

- 8.10** ARU managers told inspectors that the targets differed by workstream due to the level of complexity of the applications.
- 8.11** Staff expressed mixed views about the targets. Those working on international applications told inspectors that the time required to process ARs varied considerably for different immigration routes. Temporary Worker and Short-term Student AR applications were particularly complex and time-consuming.
- 8.12** Having to assess credibility was also a challenge. One ARU manager explained that “back in the day”, when they were assessed under the points-based system, cases were easier. ARU caseworkers were now expected to review more credibility-based decisions, particularly for skilled workers and students, which were more complex.
- 8.13** During focus groups, caseworkers told inspectors that the targets were difficult to achieve and described them as “unrealistic and unreasonable”. They felt that the targets did not take account of the fact that some applicants submitted detailed grounds in support of their application, which took time to consider.
- 8.14** Caseworkers processing in-country applications were more positive about their targets. They considered that 1.8 decisions per day was achievable. However, as with international ARs, the route and the complexity of the application could affect their ability to meet the target.
- 8.15** EUSS caseworkers reported that the 1.6 decisions per day target could be difficult, but their performance was averaged out over a month to take account of this. Again, the time taken to process an application varied depending on its complexity.
- 8.16** ARU senior managers acknowledged that EUSS applications were difficult, as the applicants could submit new evidence. This meant that caseworkers were effectively considering the decision afresh rather than focusing on the grounds for challenging the original decision as set out in the AR application. It also required caseworkers to consider if the applicant qualified under any provision of the Immigration Rules.
- 8.17** No new valid EUSS AR applications have been received since April 2024 when the right to an AR was removed. EUSS caseworkers told inspectors that they expected decisions to take longer as they approached the end of the WiP, as the remaining applications were increasingly complex.

⁹⁴ ARU set a daily, rather than weekly, target for its caseworkers. This figure is the equivalent of the daily target over a five-day working week for a full-time member of staff.

⁹⁵ During the onsite phase of the inspection, international caseworkers told inspectors that a temporary target of two applications per day had been applied to Short-term Student applications, due to the complexity of this route.

Stakeholder feedback

Timeliness of decision making

- 8.18** In response to the ICIBI’s call for evidence, stakeholders raised concerns about the timeliness of AR decision making. Eighteen (86%) of the 21 responses contained comments about significant delays.
- 8.19** Stakeholders also questioned the accuracy of the “likely wait times” for an AR decision quoted on GOV.UK. One stakeholder told inspectors:
- “In practice, legal representatives are being informed by the Home Office that decisions can take up to 24 months. This discrepancy raises serious concerns about transparency and the predictability of decision-making timeframes for administrative review, particularly for unrepresented individuals, as the public facing information appears to be inaccurate.”
- 8.20** Many respondents felt that the extensive delays to the AR process, particularly for EUSS applications, undermined the effectiveness of the system as a timely and meaningful remedy for rectifying caseworking errors.
- 8.21** Respondents also highlighted that AR was not a suitable response for applicants with a need to travel to the UK by a set date, to start a course or take up a job, for example. One said: “The service standard for ARs is published as 12 months on the Home Office website, so, understandably, students generally don’t want to submit an AR even when there is a clear caseworker error. Instead, they prefer to submit a new application to receive their visa in time for the start of their course.”

Impact of delays on applicants

- 8.22** Sixteen (76%) of the 21 stakeholder responses highlighted the negative impacts of delays on AR applicants.
- 8.23** In addition to students missing the start date of their courses and workers unable to travel to the UK to take up job offers, individuals who were already in the UK had been unable to provide evidence of their right to work due to problems proving they had section 3C leave via digital status.⁹⁶ Several stakeholders referred to the negative impact on applicants’ mental and physical health caused by the extended delays and uncertainty about immigration status.
- 8.24** Many of the responses highlighted the significant impact on European Economic Area (EEA) nationals and their family members, who had applied for an AR of a decision to refuse status under the EUSS.⁹⁷ These applicants generally had an established life in the UK. Stakeholders told inspectors that problems with digital status and conflicting information in status letters impacted their ability to work, to rent a property, and to access public services, such as the NHS.
- 8.25** However, EEA nationals and their family members experienced some of the greatest difficulties when attempting to re-enter the UK. Many had been subject to further examination by Border Force officers, some on multiple occasions. In some cases, EEA nationals and their family

⁹⁶ Leave conferred by section 3C of the Immigration Act 1971 has the effect that, where a person applies for further permission before the expiry of their current permission, their immigration conditions will extend beyond the original expiry date until the application is decided. <https://www.legislation.gov.uk/ukpga/1971/77/section/3C>

⁹⁷ The EEA consists of the countries of the European Union, as well as Norway, Iceland and Liechtenstein.

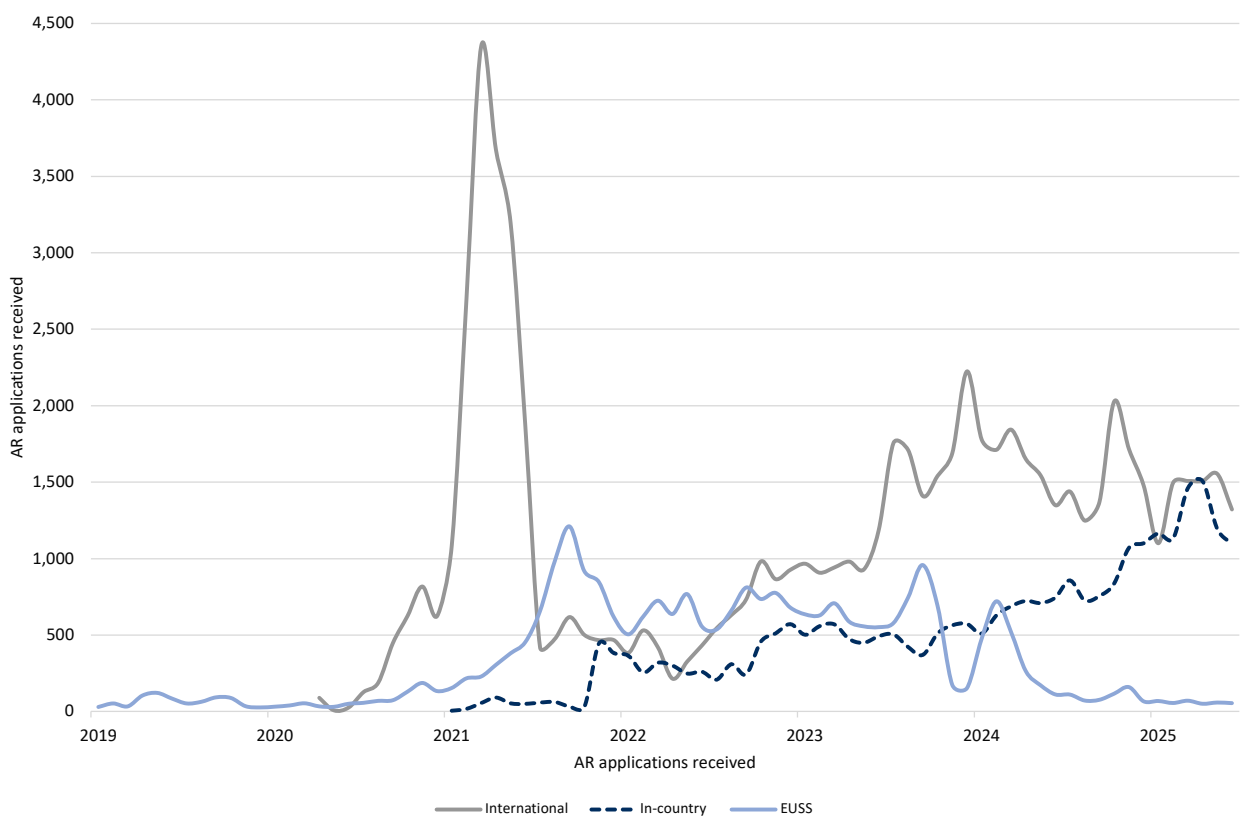
members with a pending AR had been refused entry to the UK. Because of these difficulties, some had chosen not to travel.

8.26 ARU staff at all levels were acutely aware of the impact of delays on applicants. They told inspectors they wanted to deliver a better service but could not do so without a significant increase in staffing.

Application volumes

8.27 To gain a better understanding of AR application volumes since the ICIBI’s 2019 inspection, inspectors analysed the three control sheets used by ARU to record in-country, international and EUSS ARs. A summary of this analysis is provided in Figure 16.

Figure 16: AR applications received by ARU between 2019 and April 2025⁹⁸



8.28 In-country and international applications have trended upwards since 2020-2021, with a noticeable spike in the latter in March 2021 due to the large intake of ECAA applications.

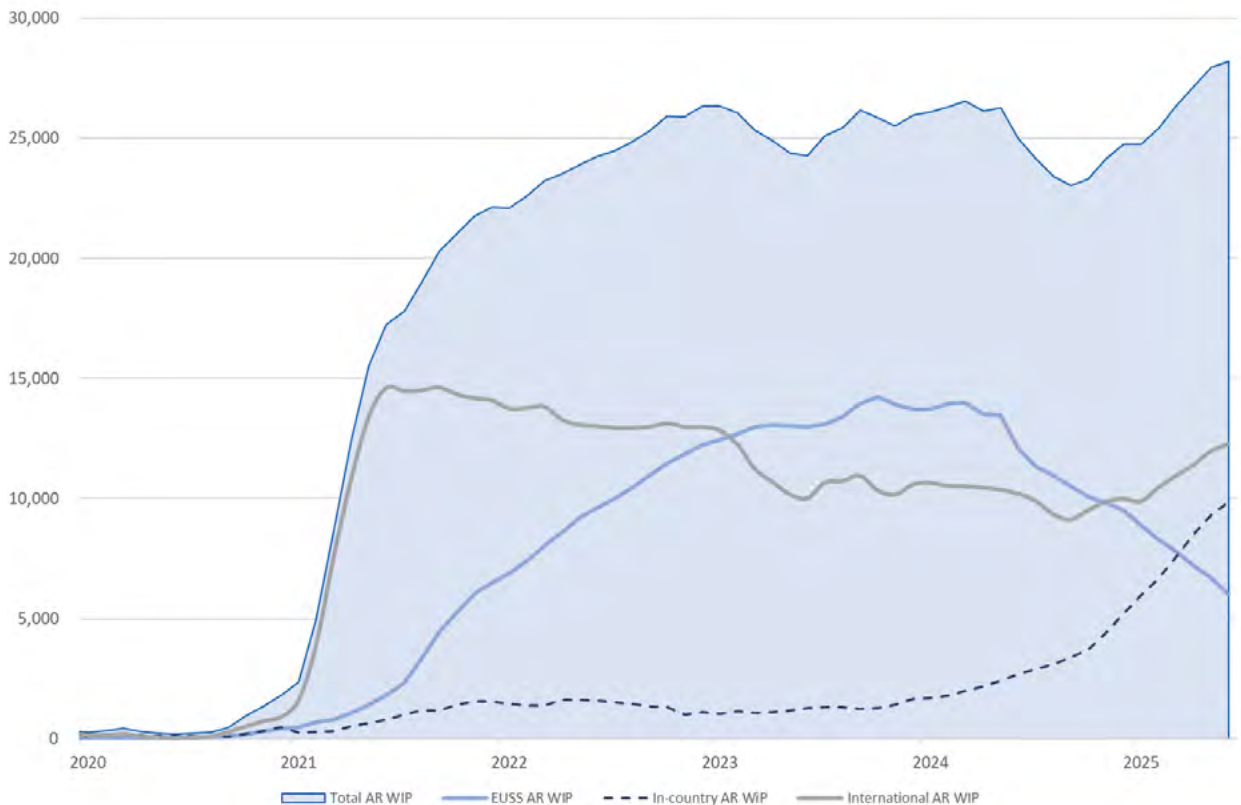
8.29 In contrast, EUSS applications peaked in September 2021 and have since trended downwards. EUSS intake declined significantly when the right to AR was removed from this cohort in April 2024. Following a change to the Immigration Rules, all EUSS AR applications received after 4 April 2024 were invalid.

⁹⁸ This data is calculated using ARU’s control sheets and excludes records where an application date was not recorded.

Growth of the work in progress queue

- 8.30** Data from the in-country, international and EUSS control sheets indicated that, between November 2018 and April 2025, ARU received a total of 123,593 applications and made 104,783 decisions.
- 8.31** Inspectors asked the Home Office to provide monthly figures for the number of applications in the work in progress (WiP) queues between 1 January 2020 and 30 June 2025. This data is summarised in Figure 17.

Figure 17: ARU's WiPs, January 2020 to June 2025

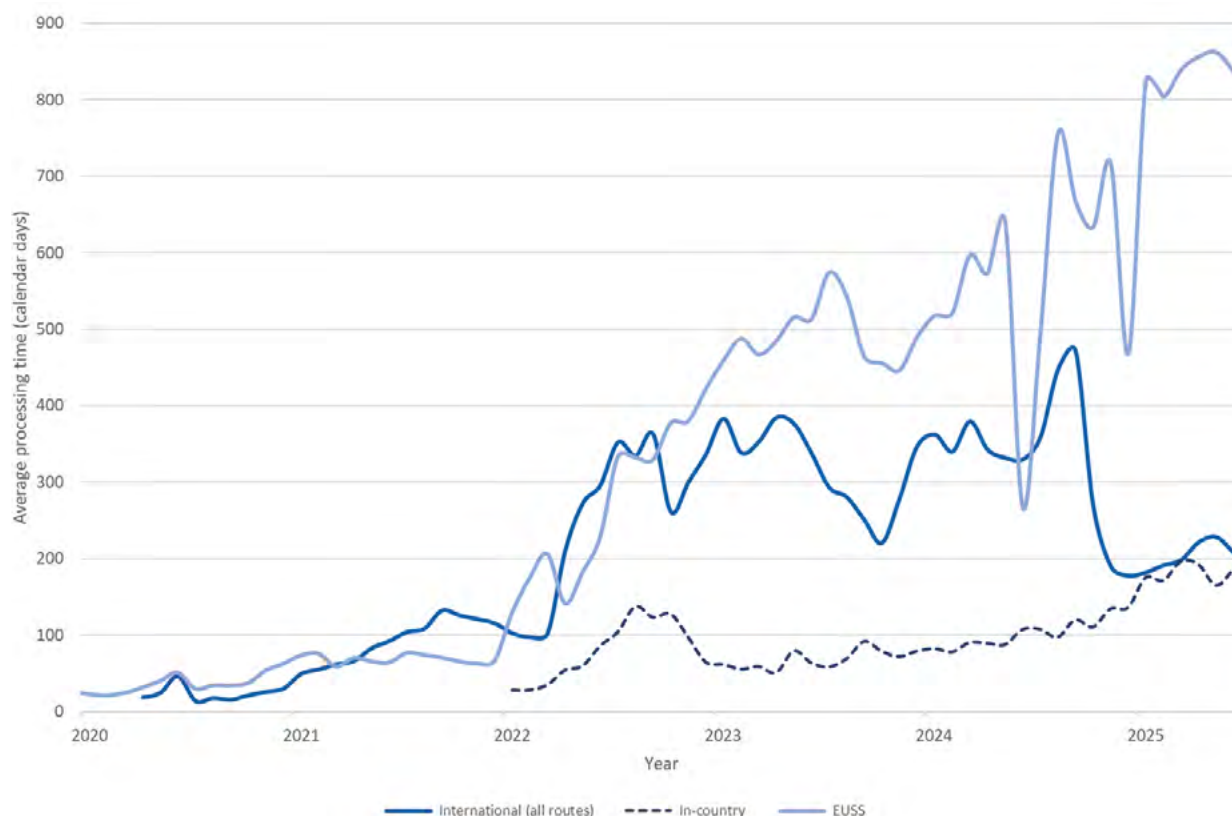


- 8.32** The overall WiP grew significantly between 2021 and 2023, and has since hovered around 25,000. In June 2025, it stood at 28,193. The international WiP peaked at 14,611 in June 2021, after which it declined until mid-2024, since when it has been growing. In June 2025 it was 12,278. The EUSS WiP grew steadily, between 2021 and late 2023, peaking at 14,238 in October 2023, and then showing a steady decline. In June 2025 it was 6,053. The in-country WiP increased in 2021, but remained around 1,400 until 2024, growing quickly to reach 9,862 in June 2025.

Average processing times

- 8.33** Using application date and decision date information provided by the Home Office, inspectors calculated the average processing times for decisions made each month between January 2020 and April 2025 for each of the three workstreams. This data is summarised in Figure 18.

Figure 18: Calculated average processing times for decisions made each month, January 2020 to April 2025⁹⁹



- 8.34** The Home Office data indicated significant increases in average processing times for AR applications across all three workstreams. EUSS AR applications showed the largest increase in average processing times, peaking at 862 days in May 2025. Average processing times for in-country applications had increased sharply in the first half of 2022 but had been cut by the end of the year, after which they increased slowly until late 2024 when they began to increase sharply again. They peaked at 196 days in March 2025.
- 8.35** Analysis of the international AR data provided by the Home Office identified that the most significant delays were in ECAA applications. The data indicated a steep and significant increase in average processing times for ECAA applications between early 2021 and December 2024 (when the ECAA WiP was cleared). Average processing times for ECAA ARs peaked at 1,158 days in September 2024. While average processing times for other types of international AR applications also trended upwards between 2021 and late 2024, it was at a significantly slower rate than for ECAA applications. Since late 2024, average processing times for international AR applications have reduced substantially.

Prioritisation and de-prioritisation of cohorts

- 8.36** ARU's standard approach was to process applications in the order in which they were received. However, it had carried out exercises to target certain cohorts within the WiP. ARU provided inspectors with a summary of decisions taken to prioritise/de-prioritise applications. See Figure 19.

⁹⁹ This data is calculated using ARU's control sheets and excludes records where an application date and/or decision date was not recorded.

Figure 19: Decisions made by ARU to prioritise/de-prioritise cohorts of applicant

| Cohort affected | Dates of implementation | Prioritised/de-prioritised and comments |
|---|-----------------------------|--|
| International ECAA applications | April 2021 to February 2022 | De-prioritised Due to an unforeseen increase in ECAA AR application numbers, the ECAA cohort was de-prioritised to focus on other cohorts of applicant |
| International ECAA applications | August to October 2024 | Prioritised From August 2024, ARU ran a 12-week overtime exercise to clear outstanding ECAA applications |
| Invalid EUSS applications, submitted after 4 April 2024 | June/July 2024 | Prioritised ARU ran a two-week overtime exercise to clear 1,500 invalid applications, submitted after the right of AR was removed in April 2024 |
| In-country errors in grant applications ¹⁰⁰ | Not stated | Prioritised While not prioritised as a cohort, in-country caseworkers had at times been allocated a greater proportion of these applications alongside their other casework |
| International students | Not stated | Prioritised While not prioritised as a cohort, international students have been allocated sooner and in greater proportion to caseworkers in peak periods, due to the time-sensitive nature of these applications. |

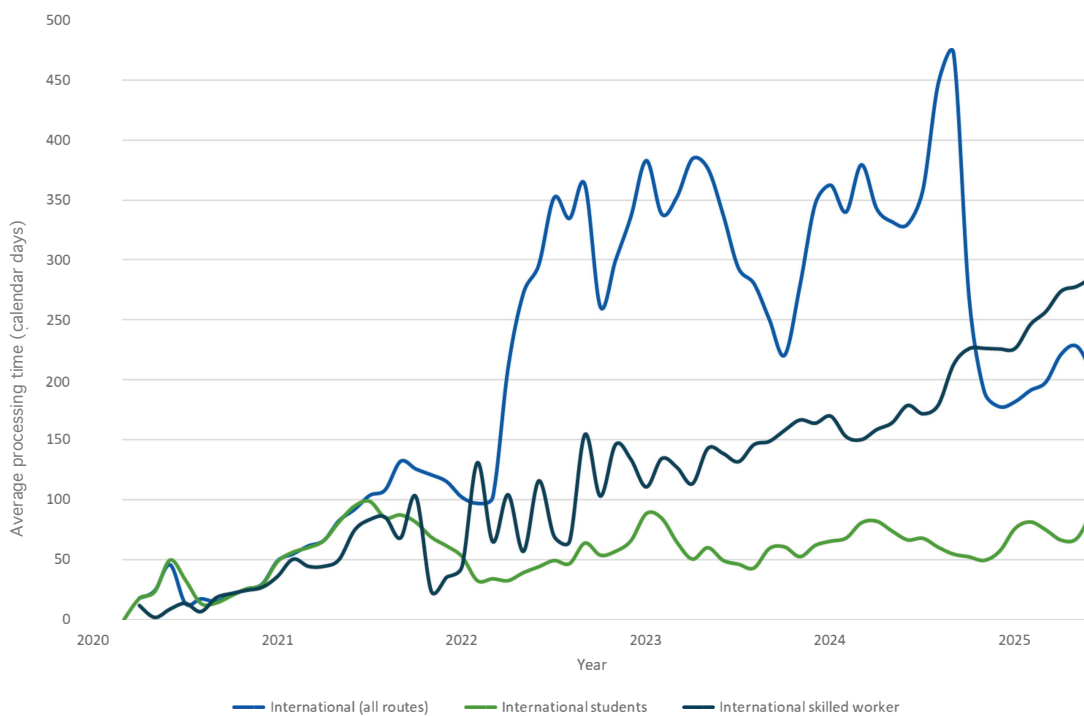
- 8.37** In written evidence, the Home Office described these as operational decisions “made to maximise output from insufficient resource and to recognise the impact of delays on a range of applicants.” Applicants were not informed about decisions to prioritise/de-prioritise certain cohorts. This was considered “not appropriate”.
- 8.38** During onsite interviews, inspectors found that some immigration routes, such as Student and Skilled Worker visas, were de facto prioritised, as more ARU caseworkers were trained to process these applications. One manager acknowledged that this may lead to different queue handling times, but others maintained that cases were dealt with in strict date order and the different number of trained caseworkers did not constitute prioritisation.
- 8.39** The Home Office provided data on the number of caseworkers trained on each immigration route as of June 2025. This ranged from 35 in the case of EUSS applications to just one for some in-country and international visa routes. In all cases, the number of trained caseworkers for any

¹⁰⁰ The Home Office allocated in-country ‘errors in grant’ applications to caseworkers in greater proportions, as these were straightforward applications. The AR route for errors in grant was removed following a change in the Immigration Rules in April 2025.

in-country route was in single figures. The same applied to international routes, except for the Skilled Worker, ECAA and Student routes, where the numbers were 23, 19 and 14 respectively.

8.40 Figure 20 illustrates the difference between overall average monthly processing times for international AR applications, and the average processing times for the Skilled Worker and Student routes. Notwithstanding the number of trained caseworkers, the average processing time for Skilled Workers had been steadily increasing since 2023.

Figure 20: Average processing times for international Skilled Worker and Student routes



Invalid and withdrawn applications

8.41 Applications that were invalid because they were submitted out of time or for an ineligible route were placed in the WiP for an EO caseworker to consider and issue a decision. As well as inflating the size of the WiP, these applications took up caseworker time and therefore affected the response times for valid applications. In 2024, ARU rejected 3,629 invalid international AR applications and 966 invalid in-country applications.

8.42 Similarly, since there was no system in place to detect and alert ARU to a change in the circumstances of an ARU applicant that met the criteria for the application to be withdrawn, these applications remained in the WiP, often for a long time, until allocated to a caseworker to consider and issue a withdrawal decision.

Delays due to policy queries

- 8.43** Inspectors heard that, in some instances, decisions were delayed while ARU waited for a direction from policy colleagues. This had affected applications from Gurkhas, complex EUSS cases, and applications involving paragraph 39E of the Immigration Rules.¹⁰¹
- 8.44** According to Home Office data, 781 AR applications were placed on hold between 2021 and July 2025 due to policy queries. Delays between an application placed on hold for policy advice and a decision ranged from 15 to 581 days.¹⁰² Figure 21 provides a summary of the average delay to applications due to policy queries for each of the three workstreams.

Figure 21: Average delay in calendar days due to policy queries

| Workstream | Average days on hold |
|---------------|----------------------|
| In-country | 155 |
| International | 322 |
| EUSS | 83 |

- 8.45** As of 1 August 2025, 359 AR applications were on hold due to policy queries.

Forecasting application volumes

- 8.46** The Home Office Analysis and Insight (HOAI) unit is responsible for providing business areas with analytical services and insight during policy development, as well as supporting operational decision making. As part of its role, HOAI provides business areas with demand forecasts to assist strategic and operational planning.
- 8.47** During this inspection, the Home Office told inspectors “Home Office Analysis and Insight do not routinely forecast for Admin Review intake, so forecasting is undertaken internally within ARU.” An ARU senior manager told inspectors that HOAI was unable to provide forecasts for the unit due to the lack of a viable management information product. Furthermore, while HOAI was willing to assist ARU, capacity was an issue due to its competing priorities.
- 8.48** ARU provided inspectors with copies of its annual forecasts covering the period from 1 January 2019 to 31 March 2025. The forecasts were based on a number of factors, such as AR intake, WiP size and number of decisions made in the previous year. They took account of planned changes to the Immigration Rules which could impact AR intake, and relied on dashboards from Visa, Status and Information Services that indicated current and predicted intake of immigration applications and decisions covering the principal routes attracting the right of an AR.
- 8.49** Figure 22 provides a summary of forecast and actual AR intake between 2019 and 2024. Although the forecasts have not accurately predicted the scale or timing of changes in the

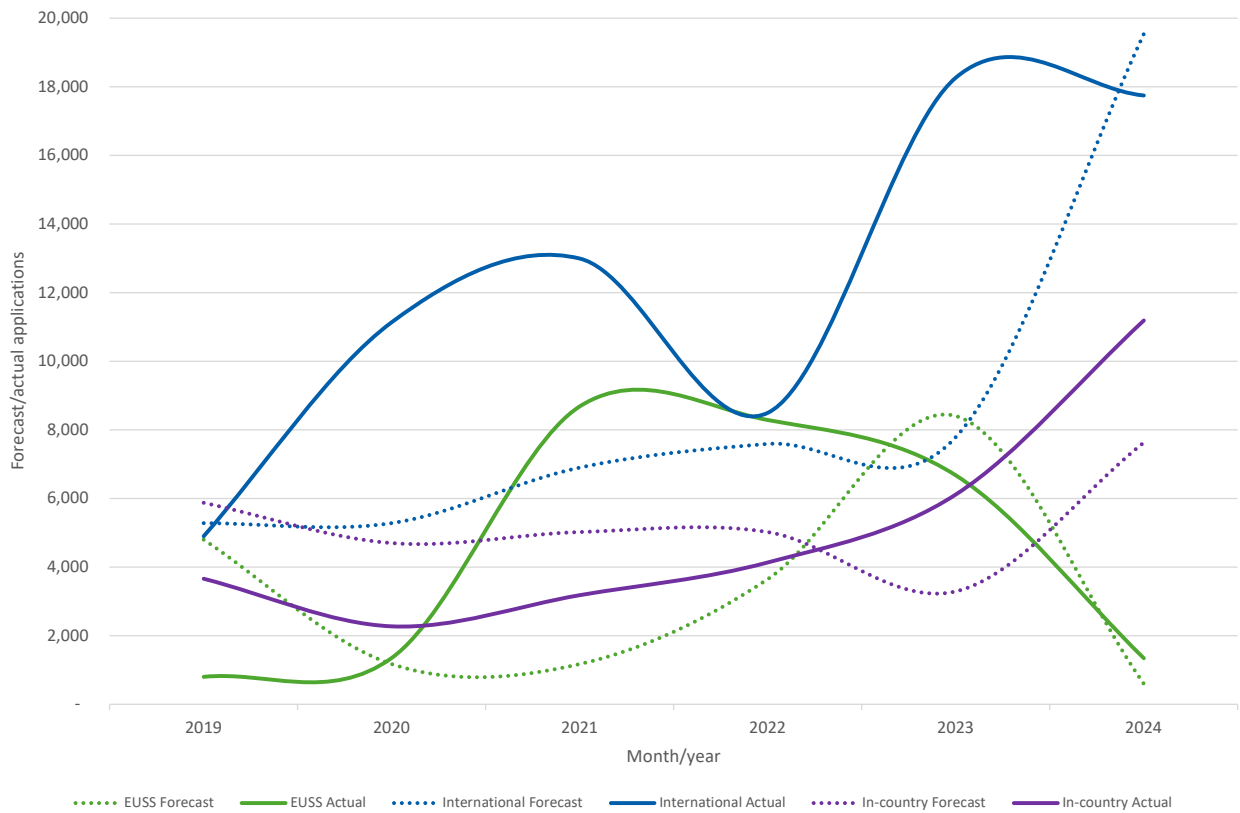
101 Section 39E of Immigration Rules part 1: leave to enter or stay in the UK allows applicants to submit a fresh application for leave within 14 days of the resolution of an AR. However, many immigration routes, such as the Graduate route, prohibit applicants from applying while on immigration bail. <https://www.gov.uk/guidance/immigration-rules/immigration-rules-part-1-leave-to-enter-or-stay-in-the-uk>

A 2023 concession for pre-1997 Gurkha and Hong Kong military veterans gave applicants a right of AR. However, a subsequent legal judgement found that, due to the human rights aspect of these applications, applicants should be given a right of appeal. A total of 485 Gurkha AR applications were held pending this legal judgement, and applications were processed from August 2024 onwards.

102 No ‘on hold’ date was recorded for 239 of the 781 applications.

actual intake, since 2023 they appear to be getting more reliable, suggesting that ARU’s understanding of demand is improving.

Figure 22: Forecast and actual AR intake, 2019 to 2024



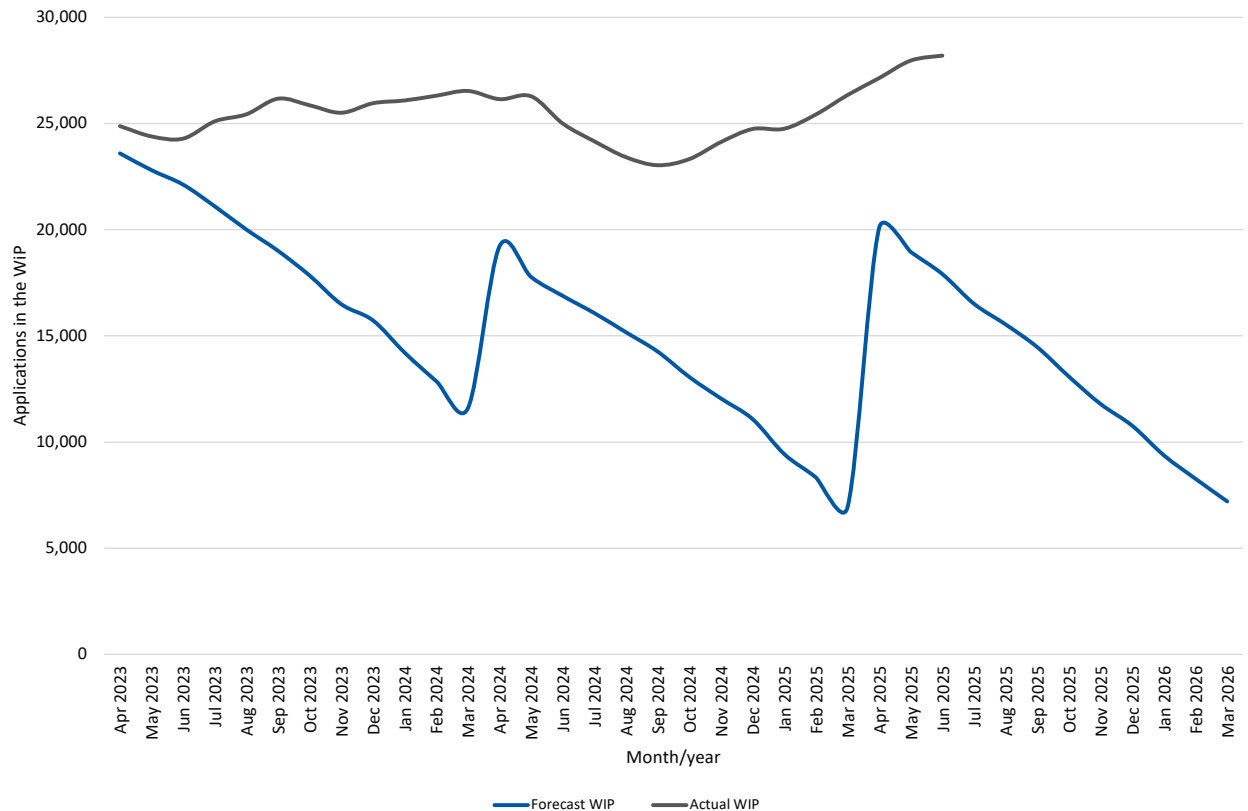
8.50 Regarding the inaccuracies in earlier forecasting, ARU senior managers pointed to three significant events:

- following the closure of the route in December 2020, the Home Office received around 13,000 ECAA AR applications during 2021, against a forecast volume of 164. These applications were not all processed until 2024
- from October 2021, the intake of EUSS AR applications was 301% above forecast, and 873% higher than 2020’s intake
- a higher-than-expected volume of ARs was received following the changes made to the Skilled Worker route in early 2024.

8.51 ARU’s WiP forecasts are used to inform capacity planning and staffing bids for the following year. ARU senior managers told inspectors that, along with intake forecasts having significantly underestimated actual applications from some routes, the increasing WiP backlog was down to ARU’s failure to secure the levels of staffing it required.

8.52 ARU provided inspectors with details of the impact it believed it could have had on the WiP in 2023-2024 and 2024-2025 if it had had the staffing levels its forecasts had indicated it required, and what could be achieved in 2025-2026 on the same basis. See Figure 23.

Figure 23: Forecast and actual WiP data from April 2023 to April 2025



8.53 To assess ARU’s preparedness for any future significant and unforeseen increases in AR applications, inspectors asked ARU managers about contingency plans. They were told that no such plans existed.

Work in progress management

8.54 ARU had made some progress towards reducing the backlog in the EUSS and international workstreams through an exercise in June and July 2024 to reject invalid EUSS applications (submitted after the removal of the right of AR), and a 12-week exercise starting in August 2024 to clear the ECAA WiP. Both exercises relied on paid overtime.

8.55 The ECAA WiP was successfully reduced from 2,279 in April 2024 to zero in December 2024. The EUSS WiP had stood at 13,523 in April 2024. In June 2025 it was down to 6,053. However, despite these reductions, the overall ARU WiP increased from 26,145 in April 2024 to 28,193 in June 2025, an increase of 7.8%.

8.56 Inspectors asked for a copy of ARU’s WiP recovery plan. In response, the Home Office provided staffing and WiP forecast data for 2025. There was no evidence of an overall strategy to reduce the WiP to a level where ARU could decide AR applications within 28 days.

8.57 During onsite interviews and focus groups, inspectors asked ARU managers about their plans to reduce the total WiP. ARU managers believed the only way to do this was by securing additional staff. This was summarised by one manager: “The WiP recovery plan is resourcing. We can’t control what’s coming into the unit; we can’t stop people applying for admin reviews.”

- 8.58** While true that additional staff would enable ARU to process more AR applications and thereby reduce the WiP, it had not been successful to date in its staffing bids. Meanwhile, it did not appear to have a 'Plan B'.
- 8.59** Based on current staffing levels, inspectors calculated that it would take approximately 20 weeks to clear the backlog of EUSS applications, 27 weeks to clear the international backlog, and 52 weeks to clear the in-country backlog.¹⁰³

¹⁰³ These figures are calculated using the permanent full-time equivalent for each workstream of 26.1 in EUSS, 14.8 in in-country and 21.6 in international as at 1 August 2025. They do not take account of any increases in AR applications, or of any staff absences (through leave or sickness), which would increase the time needed. Equally, they do not include current Flexible Deployment Team deployments. If Flexible Deployment Team numbers as at July 2025 are included, the international figure reduces to 20 weeks, the in-country figure to 37 weeks. The EUSS figure is unaltered.

9. Inspection findings: Training in the Administrative Review Unit

An overview of caseworker training

- 9.1** All new Executive Officer (EO) caseworkers were required to undertake a two-week period of classroom-based “mandatory foundation training” when joining the Administrative Review Unit (ARU). In addition, they attended courses on the immigration routes and workstreams they would be allocated to on completion of their training.
- 9.2** The classroom-based training was followed by a period of mentoring, where the new joiner was supported by an experienced ARU caseworker as they gained experience in administrative review (AR) decision making.

Training materials in ARU

- 9.3** ARU senior caseworkers (SCWs) told inspectors that training materials were based on the content provided to caseworkers in the decision-making units where the initial immigration applications were processed, which was designed by the relevant policy teams. The SCWs felt this approach was appropriate, as the main rules and guidance were the same for initial decision-making teams and for caseworkers considering AR applications.
- 9.4** The Higher Executive Officer (HEO) SCWs adapted the training materials to “retain the ARU’s impartiality and independence” and meet the ARU’s specific needs. Adaptions included additional content on aspects of AR applications that might not arise during the initial decision-making stage, such as how to apply relevant case law.
- 9.5** Training materials and packages were reviewed prior to each training session to ensure that their contents reflected any updates to policy or guidance and remained relevant. Any proposed changes to the training materials made by HEOs were signed off by Senior Executive Officers.
- 9.6** Inspectors reviewed the training materials used for new caseworkers and found that they were comprehensive and up to date.

The use of feedback

- 9.7** The mandatory training included Civil Service, Home Office, and ARU corporate inductions. It also covered operating mandate checks, caseworking IT systems, ethical and responsible decision making, the assurance process, and safeguarding training.¹⁰⁴ The remainder of the classroom-based training was tailored to the workstream and immigration route(s) to which the caseworker was being allocated.

¹⁰⁴ According to the Home Office intranet, the UK Visas and Immigration operating mandate “is a document which clearly sets minimum mandatory identity and suitability checks to be completed as part of each application for entry clearance and leave to remain.”

- 9.8** SCWs told inspectors that they had used the feedback they received from trainees, to develop and improve the training sessions. This had included a move away from a mostly PowerPoint-based method of delivery to greater use of case examples, practical exercises, and trainees spending time sitting alongside their mentors, which had allowed trainees to see how the information and skills they had learned would be applied in practice during the mentoring period. Caseworkers and SCWs told inspectors that the changes to the training approach had been beneficial and had improved new entrants' understanding of the process for assessing and deciding AR applications.
- 9.9** According to the SCWs, training worked well with groups of five or six trainees. However, it had been less successful when ARU had onboarded around 15 new staff at the same time. The HEO SCWs leading the training told inspectors they had concerns about trainees maintaining focus in such large groups. Additionally, the requirement to conduct 100% checks for 15 new starters placed too great a burden on HEO SCWs alongside their other duties. As a result of this feedback, the larger cohort model was not repeated.
- 9.10** SCWs and ARU senior managers told inspectors that the classroom-based training was only one part of the overall training programme. It was designed to give caseworkers the basic knowledge of the route(s) they would be working on. It was not expected to make them fully effective in their role.
- 9.11** SCWs and caseworkers explained that the post-classroom mentoring period, during which caseworkers worked on 'live' applications, was where the knowledge gained in training was developed and applied. A SCW told inspectors:

“It is not a job where you can do training and then be good to go... it's very much a learn on the job via feedback. Yes, the induction is important, but it's not the end of the learning process.”

The mentoring period

- 9.12** On completion of the classroom-based training, new EO caseworkers were paired with a mentor. The mentor's role was to support the new caseworker through the decision-making process, answer general caseworking queries, and provide a 'second pair of eyes (SPoE)' check on their decisions before they were submitted for quality assurance (QA) checking.
- 9.13** SCWs could make recommendations to their Senior Executive Officers about who would or would not be suitable for the role of mentor. In general, those selected were volunteers, deemed competent by the SCW team, and maintained a "good productivity rating".
- 9.14** Caseworkers told inspectors that the mentoring part of the training was when the theory from the classroom-based sessions would be implemented. One caseworker explained: “[in the classroom] you learn the theory and the checks you need to do, but when you actually do the cases is when you really learn the job”.
- 9.15** While there was no set length for the mentoring period, each caseworker received mentoring support for “roughly four weeks”. HEO SCWs emphasised to inspectors that getting signed off as fully competent “isn't a race” and a caseworker's background, knowledge and experience would affect how long the mentoring lasted.

- 9.16** A mentoring checklist was used to track progress. This listed 65 subjects, split into six categories, which were to be covered during the mentoring period.¹⁰⁵ The checklist had three columns for completion: the date the topic was covered, with space for any comments from the mentor; caseworker comments; and a column entitled ‘confidence after 4th week’, which required the caseworker to rate their level of understanding as either red, amber, or green.
- 9.17** HEO SCWs told inspectors that they worked closely with the mentors to identify any training or knowledge gaps. Where gaps were identified, they would be addressed through additional support or training.
- 9.18** At the end of the mentoring period, the new caseworker and their line manager worked with the HEO SCWs to complete an end of mentoring review and action plan. The action plan asks the new caseworker about their caseworking confidence, where they feel they would benefit from further support, and if there is anything that might assist their development as a caseworker. The aim is to “agree any additional support going forward to assist with caseworker development” and for line managers to “review the confidence against the mentoring checklist to inform discussions and next steps.” The last section of the action plan sets out what additional support might be required, who is responsible for providing that support, the review period and a completion date.

The ‘sign off’ process

- 9.19** During mentoring, all of the decisions made by new caseworkers are subject to QA checks by a SCW.
- 9.20** The QA scores for new caseworkers are recorded and form part of the discussions held by the SCW team when considering if a caseworker should be ‘signed off’ and subject to fewer QA checks.
- 9.21** As well as their QA scores, the SCW team also considered whether the caseworker was absorbing feedback and not repeating errors, and “behavioural issues”, such as the extent to which the caseworker relied on advice from others, and whether they were progressing towards making “independent” decisions on their allocated cases.
- 9.22** Caseworkers were positive about the 100% QA checks and the ‘sign off’ process. They described the feedback they received from SCWs as “constructive” and “vital”, adding that it was “essential when you are training as that is how you learn”.

Follow-up training and wrap-around support

Senior caseworker support

- 9.23** Caseworkers were encouraged to speak to their mentors and HEO SCWs if they needed additional advice or guidance after they had been signed off. For straightforward matters, they could speak to an HEO SCW or send them an email. If the query was more complicated, or required a detailed response, caseworkers were expected to complete a ‘query form’ which automatically generated an email to the SCWs’ inbox. Once received, the emails were allocated to an HEO based on the AR workstream – EU Settlement Scheme (EUSS), in-country or international.

¹⁰⁵ The categories were rules/guidance, systems, operating mandate, casework, useful casework websites, and dispatch.

9.24 SCWs told inspectors that the introduction of the query form had helped to standardise how caseworking questions were structured, while also encouraging caseworkers to consult guidance documents before submitting a query. The standardised format and automated email also simplified the allocation process for new queries to be dealt with.

Supplementary training

9.25 Caseworkers told inspectors that they were able to approach SCWs to request refresher or additional training and support, if required. This might involve new caseworkers sitting alongside more experienced colleagues or repeating initial training sessions to help consolidate their knowledge in specific areas.

9.26 SCWs maintained a list of additional development sessions that had been delivered. Between January and the end of May 2025, they had delivered 17 sessions covering a variety of topics, including case law, fraud training, the 'genuine student' rule, identifying and addressing grounds, and a refresher on skilled workers.¹⁰⁶

9.27 SCWs also analysed the management information data from the QA checks they conducted. Working in tandem with the caseworker's team leader, they used this data to identify areas where QA scores indicated emerging error trends or other areas where caseworkers may benefit from additional training.

¹⁰⁶ Immigration Rule ST5.1 of Appendix Student states "The applicant must be a genuine student". <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-student>

10. Inspection findings: Quality and consistency of decisions

Customer Services Group Quality Assurance Strategy

- 10.1** Quality assurance (QA) processes in the Administrative Review Unit (ARU) were based on the Home Office’s Customer Services Group (CSG) Quality Assurance Strategy, published in July 2023, which was intended to set “the strategy for assuring that decision making and operational delivery in Customer Services [Group] is of a consistently high quality”.
- 10.2** Adhering to the strategy will help managers to “identify risks to quality outcomes, and opportunities for improvement, using the three lines of defence approach to assurance” as shown in Figure 24.

Figure 24: The ‘three lines of defence’ model

| First line | Second line | Third Line |
|---|---|--|
| Assurance provided directly from those responsible for delivering specific objectives or operations | Assurance from those that are independent from delivery but still within the management chain | Independent, objective assurance of the department’s governance, risk management and control frameworks by Government Internal Audit Agency/ICIBI ¹⁰⁷ |

- 10.3** Earlier versions of the strategy specified that 2% of outputs, regardless of the complexities and levels of risk involved, should be subject to QA. However, in July 2023 a change was made to the guidance removing the fixed 2% sample rate as “this placed a burden on high volume/low risk areas at the expense of sampling of high-risk functions.”¹⁰⁸
- 10.4** The revised strategy stated that the following factors should be taken into consideration when calculating the required QA sample size:
 - the level of complexity of decision making or processes
 - the accuracy and robustness of first-line assurance
 - previous quality scores
 - appeal/administrative review win rates

107 The Independent Chief Inspector made it clear in his 2020-2021 Annual Report that ICIBI does not perform an assurance function. “The other point of substance I raised regarding the draft terms of reference for the independent review [of the ICIBI’s role and remit, recommended in Wendy Williams’ report ‘Windrush Lessons Learned Review’] concerned the conflation of inspection and assurance. BICS [Home Office] senior managers have previously referred to ICIBI providing ‘third-line assurance’. This is not its function, as Wendy Williams explains in her report (page 141) in responding to the assertion that ICIBI should have spotted what was happening to members of the Windrush generation. Home Office managers must take responsibility for first-, second- and third-line assurance, since these directly affect the quality and consistency of decision making (getting it ‘right first time’), and the early identification of issues. Inspectors may identify specific errors, and where they do these are raised directly with the Home Office, but reviews of sample cases are just one part of the evidence base for an inspection and are generally used to test and illustrate key findings rather than as an end in themselves.”

108 The 2% sampling rate was introduced when the Decision Quality Framework was created in 2015, at which time the Assurance team’s remit moved beyond asylum to include other parts of the CSG.

Customer Services Group Quality Assurance Standard Operating Procedure

- 10.5** The CSG Quality Assurance Strategy was supplemented by the Customer Services Quality Assurance Standard Operating Procedure (QA SOP), published in January 2024. The QA SOP set out the “practicalities of assurance to support effective practice and compliance with the strategy”. It included information on roles and responsibilities, sampling rates, assurance marking standards, the assurance tools that can be used by Home Office staff, and how QA results and outcomes could be reported.
- 10.6** The QA SOP advised that random sampling should be conducted to give a picture of overall quality, whereas 100% sampling should be chosen for assurance during mentoring, or for individuals on performance management plans.¹⁰⁹ Where possible, assurance should be conducted before the decision is finalised and sent.¹¹⁰
- 10.7** The QA SOP also specified that assurance checks should be recorded on “bespoke quality assurance tool” rather than locally held spreadsheets which limited the ability to conduct data and trend analysis to inform improvement activity.

Administrative Review Unit Assurance Strategy

- 10.8** The Home Office provided inspectors with a copy of the ARU Assurance Strategy, dated May 2024. This document was closely aligned with the CSG Assurance Strategy and stated that “ARU will strive to maintain the highest levels of sampling operationally possible due to the AR decision being the last decision point before litigation.”

Assurance in the Administrative Review Unit

- 10.9** While the Grade 7s were accountable for the overall assurance of ARU, Higher Executive Officer (HEO) senior caseworkers (SCWs) were responsible for conducting first-line assurance checks. These consisted of 100% checks on the decisions made by ARU caseworkers who were being mentored (not yet ‘signed off’) or who were learning new immigration routes, and a randomly selected sample of 2% of all other decisions.
- 10.10** In addition to this, and as set out in the ARU Assurance Strategy, Senior Executive Officer (SEO) SCWs were responsible for performing randomly selected 2% checks on HEO SCW first-line assurance assessments. These checks were known as ‘first-line (secondary) assurance checks’.
- 10.11** Feedback from these assessments was provided to the individual HEO SCW to ensure the consistency and quality of the first-line checks.

Marking standards

- 10.12** The QA SOP set out marking standards which produced a score of between 1 and 5 for each assessed decision. Figure 25 shows the quality scores and definitions of the marking standards.

¹⁰⁹ A performance management plan can be used where the job holder’s performance has fallen below the standard required for them to carry out their role effectively.

¹¹⁰ The standard operating procedure stated that “However, it is recognised that there are other factors, including IT systems, which may prevent checks from taking place before the decision or output is finalised. Where this is the case, business areas should consider relevant mitigating action to address any significant or fail errors which are identified post-service.”

Figure 25: Quality scores and marking standards

| Quality score (low to high) | Definition |
|--------------------------------|--|
| QS5 | Overall question marked as ‘incorrect/fail’ plus one other ‘fail’ error elsewhere in the casework section (i.e. not the overall question). A ‘fail’ error not only detracts from the consideration, but also affects the decision such that the outcome cannot necessarily be relied upon and immediate attention is required to address the critical failure(s) – there are significant risks/negative impacts on the customer, Home Office or the UK as a result of this error. |
| QS4 | At least one ‘fail’ marking on the casework section but the overall question is marked as ‘correct’. ‘Correct’ is where the consideration is fully justified and adheres to legislation, policy and guidance. There are no risks to the customer, Home Office or the UK. |
| QS3 | At least one ‘significant’ marking on the casework section. A ‘significant’ error detracts and negatively impacts the quality of the consideration of the decision and requires attention to address serious weaknesses or omissions – there are potential risks/negative impacts on the customer, Home Office or the UK as a result. |
| QS2 | More than 20% of relevant casework questions (i.e. excluding any marked as ‘N/A’) are marked as ‘minor’. A ‘minor’ error does not detract from the overall consideration and would not affect the outcome of the decision and should be quickly rectified – there are no apparent risks/negative impacts on the customer, Home Office or the UK as a result. |
| QS1 | Where none of the above apply. |

10.13 The SOP specified that a quality score (QS) of QS1 or QS2 was ‘satisfactory’, whereas a score QS3, QS4 or QS5 was ‘unsatisfactory’. SCWs told inspectors that they considered quality scores of between QS3 and QS5 to be ‘fails’.

10.14 According to the ARU Assurance Strategy, a score of QS1 was the “expected quality standard”, and there was an overall quality target that 90% of sampled decisions should score QS1 or QS2.

Assurance checking rates

10.15 ARU’s Assurance Strategy directs that all decisions made by caseworkers must be sent to the SCW inbox for potential selection for a QA assessment.

10.16 HEO SCWs aimed to assure 100% of decisions made by new caseworkers, or those assigned to a new immigration route. As the caseworker’s experience and capabilities increased, checks were reduced incrementally until the SCW team deemed that the minimum 2% sample rate was sufficient for the individual caseworker.¹¹¹

111 Inspectors saw examples of caseworkers on quality assurance checking rates of 100%, 50%, 25%, 10%, 5% and 2%.

- 10.17** The ARU Assurance Strategy did not specify the number of ‘satisfactory’ scores a caseworker had to reach to be ‘signed off’, as the immigration routes they had to consider differed in complexity. The SCWs met and worked as a team to discuss the quality and consistency of each caseworker’s output. During this discussion they would decide if the frequency of the QA checks should be reduced.
- 10.18** The ARU strategy set out that QA check frequencies would be increased where there were concerns about the quality of a caseworker’s decisions. As a minimum, if a caseworker received two ‘negative’ QS scores in a row, the SCW and the caseworker’s line manager would work together to implement improvement action.¹¹² ARU staff confirmed that this happened.
- 10.19** Where an amendment was made to the frequency of QA checks, the caseworker and their line manager would meet to discuss the change. Once the caseworker’s QA scores improved, consideration would be given to reducing the frequency of checks. Where support provided to the caseworker did not result in an improvement in quality scores, informal or formal performance plans would be implemented.

The Administrative Review Unit’s quality assurance tool

- 10.20** To submit a case for potential QA selection, a caseworker completed a Microsoft Lists ‘QA submission tool’ form. This form contained details such as the reference number and the immigration route under which the AR had been applied for. Each entry was automatically recorded on a separate ‘QA volumes spreadsheet’, from which HEO SCWs would select a decision for QA.
- 10.21** Details of all QA checks undertaken were recorded on a bespoke decision quality assurance tool (DQAT). The DQAT was an Excel-based tool containing a series of set questions to be answered by the SCW when completing the assessment. The assessment questions varied depending on the workstream (EU Settlement Scheme, in-country, or international).
- 10.22** Decisions made in ARU received two separate scores. The first was an Operating Mandate score which related to the “minimum mandatory identity and suitability checks” which had to be carried out as part of the consideration of an application. The second score was a casework score.
- 10.23** DQAT automatically calculated the relevant quality scores based on the SCW’s responses to the assurance questions. These scores were then included in a feedback form generated by DQAT, which allowed for the inclusion of additional free text feedback comments from the assessor. The QA SOP advised that the feedback should be “constructive and add value to the assessment of quality.”

The Administrative Review Unit’s performance against the Assurance Strategy

- 10.24** As part of second-line assurance checks, the Performance, Assurance, Improvement and Risk (PAIR) Team within CSG provided an assessment of first-line assurance practice in ARU at least annually. Where appropriate, PAIR made recommendations to “improve first-line assurance

¹¹² A quality score (QS) of 3 is classed as a negative, 4 or 5 are classed as fails. For the purposes of quality assurance, two decisions which scored QS3-5 would require an immediate conversation.

activity and to mitigate risks identified”. Findings from these second-line assurance checks were compiled into Quality Assurance Reports.

10.25 The Home Office considers Quality Assurance Reports as:

“... critical measures of how Customer Services [Group] calibrates its confidence in decision making, operational processes, quality and performance. They are used to benchmark the direction of travel in assurance capability.”¹¹³

10.26 The Quality Assurance Report provided a rating of either ‘substantial’, ‘moderate’, ‘limited’, or ‘unsatisfactory’. In addition, reports may flag emerging risks, and where necessary, provide recommendations relating to the assurance work conducted in the area being assessed.

10.27 The Home Office provided copies of the PAIR Quality Assurance Reports for ARU for 1 March 2023 to 29 February 2024 and for 1 March 2024 to 28 February 2025. In both reports ARU was rated ‘substantial’. According to PAIR’s criteria, this indicated that “Comprehensive first-line assurance is fully implemented and embedded, comprehensive systems and processes are in place to support performance management.” In terms of quality, a ‘substantial’ rating indicates “high-quality first-line assurance including rigorous testing, effective analysis of wide-ranging data, improvements prioritised, monitored and recorded.”

10.28 Inspectors noted that the reports for both periods indicated a “stable trajectory” in terms of the QA work undertaken by ARU. No recommendations for improvements were made.

10.29 The earlier Quality Assurance Report noted that ARU had “achieved a high-quality standard across all workstreams” and had a “robust approach ... to applying marking standards”. It also highlighted examples of positive practice in ARU to improve the quality of the decisions made.

10.30 The later report noted that ARU had “robust governance arrangements” in place.

Assurance checking rates in the Administrative Review Unit

PAIR Quality Assurance Reports

10.31 Inspectors examined ARU’s QA volumes spreadsheet. This recorded the AR application reference number, the name of the caseworker, the route the application was made under, whether the case had been selected for QA and the SCW responsible for the QA checks.¹¹⁴ The Home Office told inspectors that the QA volumes spreadsheet did not include dependants, adding that each case was submitted to the spreadsheet using the main applicant reference number and that all dependants linked to that case would be checked as part of the QA process.¹¹⁵

10.32 The 1 March 2023 to 29 February 2024 Quality Assurance Report noted that the overall routine sampling rate achieved for all workstreams was 1.54% (468 of 30,342 applications). The report

113 Customer Services Group Quality Assurance Standard Operating Procedure, January 2024.

114 When asked about data discrepancies between the data extracted from DQAT and the QA volumes spreadsheet, the Home Office told inspectors that the “QA volumes spreadsheet is a selection tool for the QA process only and is not reflective of or used for overall MI [management information]”. For the purposes of the inspection, inspectors analysed the QA volumes spreadsheet when assessing the number of cases quality assured in ARU and DQAT to assess the QA outcome scores.

115 In its factual accuracy response, the Home Office stated: “This clarification around dependants not being directly recorded on QA checks highlighted that reporting of all QA sampling will have been under-reported. This is the case for local ARU QA reporting, for PAIR quality reports and in the following section of this report. ARU managers have confirmed following this inspection that changes will be made to the DQAT tool to ensure that a quality check will record how many decision letters are quality checked when there are dependants linked to a main applicant to bring more accurate reporting of QA percentages in the future”

indicated that routine sampling was below the expected 2% rate largely due to the level of recruitment and onboarding that had taken place, which meant there had been a greater focus on 100% sampling. It highlighted that, when routine 2% and 100% sampling were combined, ARU achieved a sampling rate of 8.65% of all decisions.

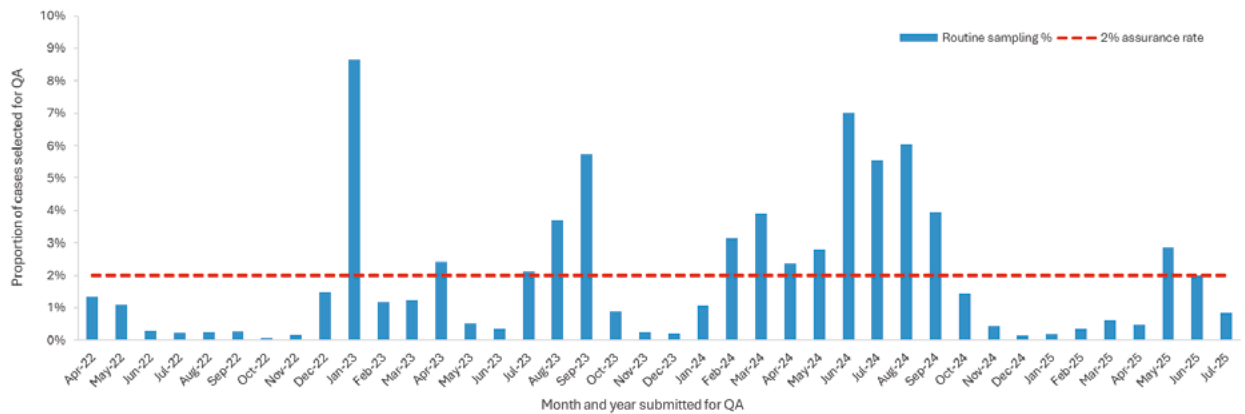
- 10.33** The 1 March 2024 to 28 February 2025 Quality Assurance Report did not provide an overall assurance sampling rate for ARU. It split the assurance rate by workstream. The average routine sampling rates were given as 2.64% for EUSS, 3.05% for in-country, and 1.97% for international decisions. The report noted that the sampling rate for EUSS and in-country had exceeded the minimum 2% sampling rate for the year as a whole but highlighted that this had not been consistently achieved on a monthly basis.
- 10.34** The 2024-2025 Quality Assurance Report noted the inconsistencies in monthly routine sampling rates, and a “noticeable decline” across all workstreams in October and November 2024, which continued for the remainder of the reporting period. ARU explained that the ‘dip’ was due to a tranche of new starters requiring 100% checks. The Quality Assurance Report concluded:
- “Due to the failure to consistently achieve the 2% sampling rate for ‘EUSS’, ‘In-Country’ and ‘International’ decisions, there is a risk that opportunities to improve decision quality and/or process efficiency are not quickly identified and fully exploited”.
- 10.35** PAIR told inspectors that the only concern they had with QA in ARU was the ability to consistently meet the 2% routine sampling level. However, the drop in routine sampling during periods of onboarding was “inevitable” and considered to be an acceptable risk.
- 10.36** A PAIR senior manager told inspectors that ARU had a positive approach to, and understanding of, the QA process and the benefits of having an effective QA regime. Overall, they considered ARU to be “very proactive” and “low risk in terms of assurance”.

ARU QA data

- 10.37** Inspectors analysed ARU’s QA volumes spreadsheet, focusing on the record of decisions submitted to the SCW inbox for potential QA check selection between 1 April 2022 and 23 July 2025.¹¹⁶ In that 40-month period, ARU reached 2% routine sampling checks on 14 occasions in total, but only once since September 2024. See Figure 26.

¹¹⁶ The Home Office informed inspectors that “Cases sent for QA and recorded on the QA volumes spreadsheet do not include dependants. Each case is submitted using the main applicant reference and if the case is selected for QA, all dependants linked to the main applicant on the relevant caseworking system will be checked in line during QA.”

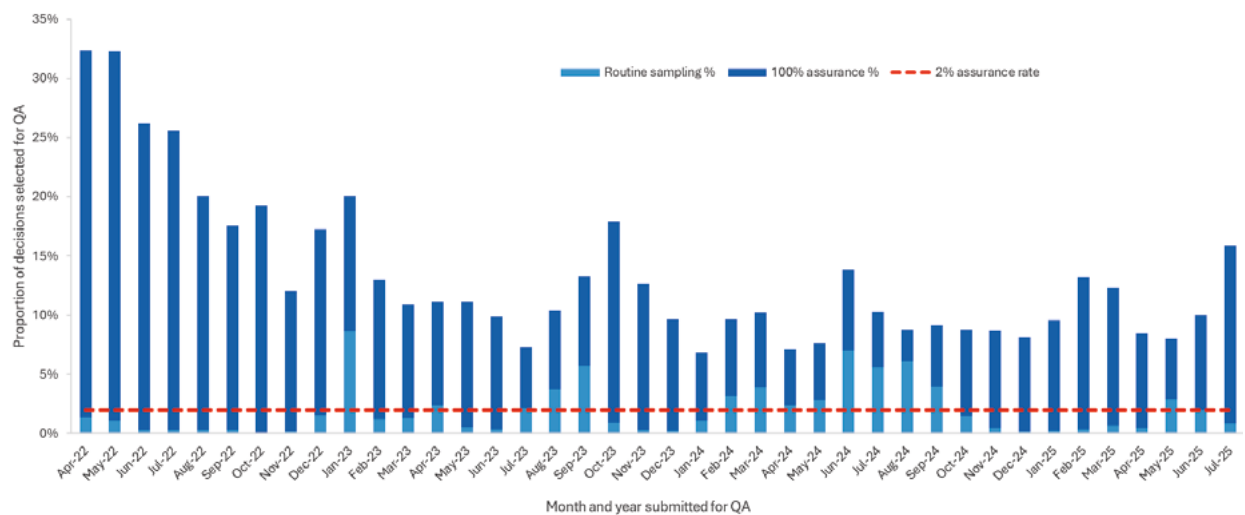
Figure 26: Percentage of first-line routine assurance checks conducted between April 2022 and July 2025



10.38 In interviews and focus groups, SCWs echoed the PAIR finding that they had not consistently met the 2% routine sampling target due to the recruitment of new caseworkers, resulting in more 100% QA checks. The 100% checks and follow-up feedback sessions were said to be more time-consuming as new starters were likely to make more errors and need more in-depth explanations about how to avoid repeating the same errors. SCWs told inspectors that more SCWs would be needed to meet the target for 2% routine assessments consistently.

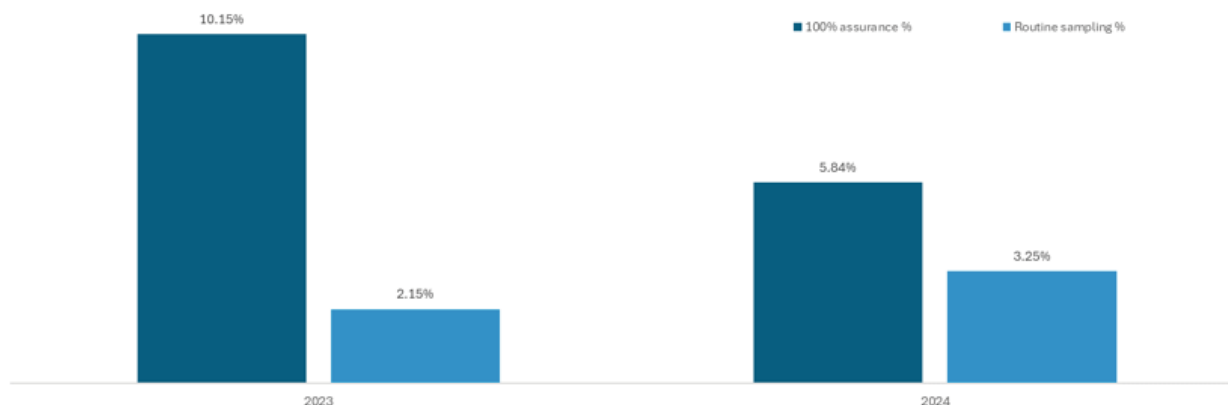
10.39 Figure 27 shows the correlation between decreased routine QA assessment rates and increased 100% QA checks.

Figure 27: Percentage of routine and 100% assurance checks conducted between April 2022 and March 2025



10.40 Again echoing PAIR, SCWs at both HEO and SEO grade told inspectors that the 2% routine sample target had been met on an annual basis in 2023 and 2024. Figure 28 shows the annual assurance rates for 2023 and 2024 for both 100% checks and routine sampling.

Figure 28: Annual assurance rates for all decisions made in ARU



10.41 Inspectors analysed data from January to July 2025 to assess ARU’s monthly QA levels since the beginning of 2025. See Figure 29.

Figure 29: Assurance rates for all decisions made in ARU between January and July 2025

| Month | 100% checks | Routine assurance rate |
|----------------------------|--------------|------------------------|
| January | 9.39% | 0.20% |
| February | 12.82% | 0.34% |
| March | 11.69% | 0.62% |
| April | 8.01% | 0.47% |
| May | 5.13% | 2.87% |
| June | 8.04% | 1.98% |
| July ¹¹⁷ | 15.05% | 0.85% |
| 2025 assurance rate | 9.89% | 1.03% |

10.42 HEO SCWs told inspectors there was “no consistency [in routine assurance levels] across the year”, explaining that, when not conducting high levels of 100% QA, they would do more routine sampling in “short bursts”. They were aware of the importance of routine sampling and the impact that 100% QA checks were having. One SCW told inspectors:

“The other caseworkers are not getting feedback as regularly as they’d like to. When I was a caseworker and you’re not having feedback, it can make you doubt if you’re still doing the right thing. It’s nice to get the review and reassurance that you’re doing the right thing.”

Quality assessment scores in the Administrative Review Unit¹¹⁸

10.43 To assess ARU’s performance against the expectation that 90% of decisions would achieve a score of QS1 or QS2, inspectors analysed data from ARU’s decision quality tool, covering the period 1 March 2024 and 30 June 2025.¹¹⁹

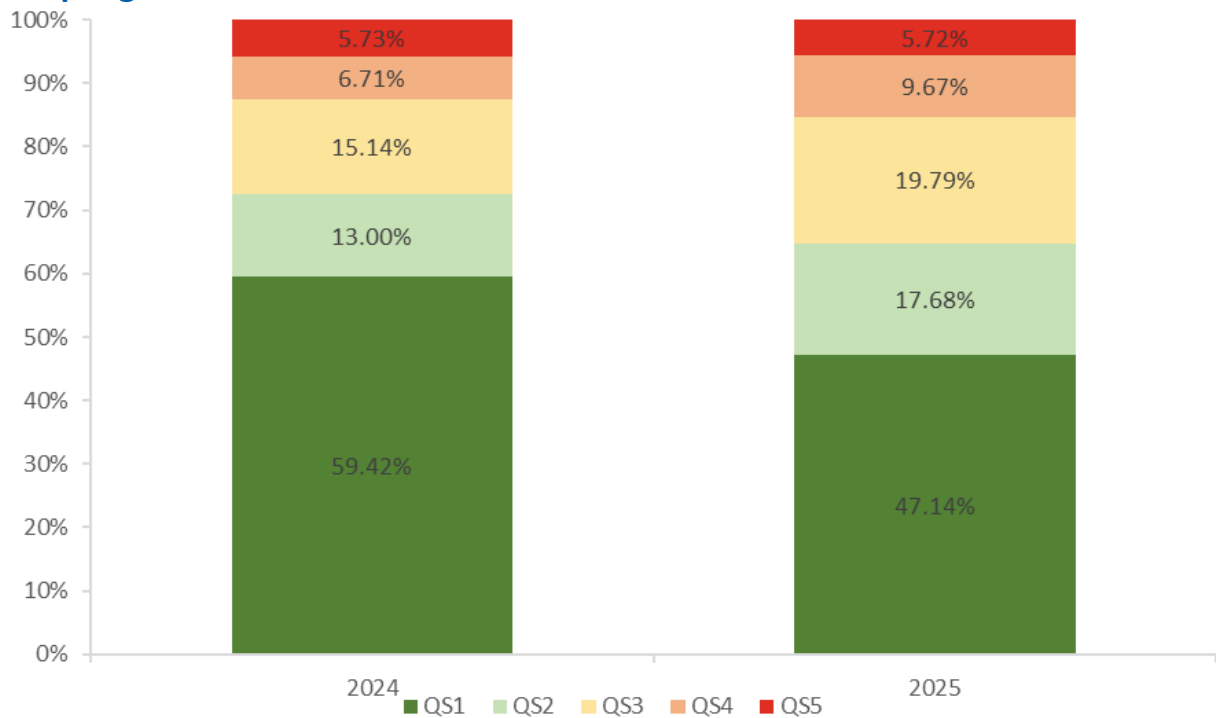
¹¹⁷ The QA volume data for July was not a complete month and finished on 23 July 2025.

¹¹⁸ The data used in this section relates to the period 1 March 2024 to 30 June 2025.

¹¹⁹ The DQAT management information tool is built and maintained by the Systems Development and Support Team within PAIR.

- 10.44** For the EUSS, in-country, and international workstreams collectively, 78.77% of decisions selected for a routine assessment were scored QS1 or QS2. With the 100% checks, this figure dropped to 65.75% of decisions.
- 10.45** Figure 30 shows that, across the three workstreams, the proportion of cases scoring QS1 or QS2 for 100% checks and routine checks combined decreased by 7.6% in 2025 compared with 2024.

Figure 30: Quality score comparisons between 2024 (1 March–31 December 2024) and 2025 (1 January–30 June 2025). All workstreams –100% and routine sampling checks combined



- 10.46** The decrease in quality scores was partly due to an increase in the number of 100% assurance checks receiving a score between QS3 and QS5, which SCWs told inspectors could be a new caseworker, or one recently assigned to a new immigration route, or put on a higher level of checking as part of a development or performance plan. In such cases, lower QS were to be expected. See Figures 31 and 32.¹²⁰

¹²⁰ The DQAT only recorded information on routine (2%), 100% and secondary assurance checks.

Figure 31: 100% assurance check outcomes – all workstreams, between 2024 (1 March–31 December 2024) and 2025 (1 January–30 June 2025)

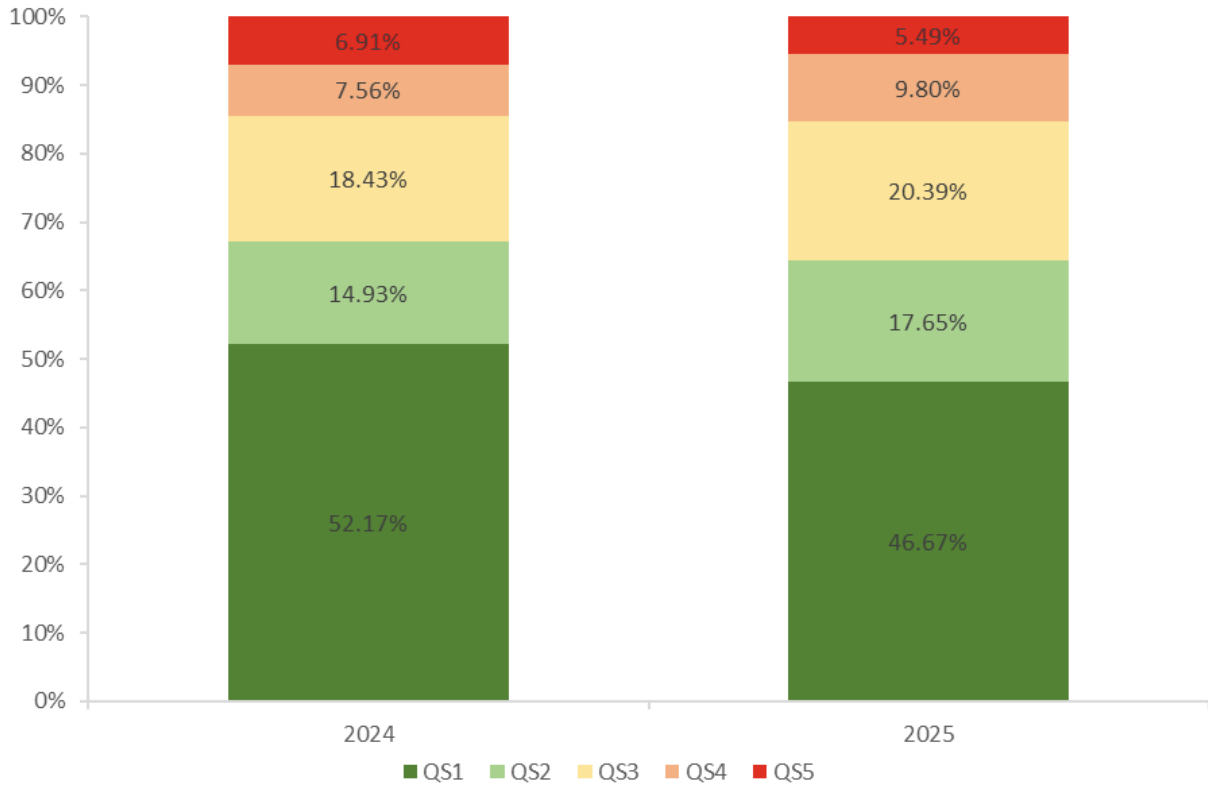
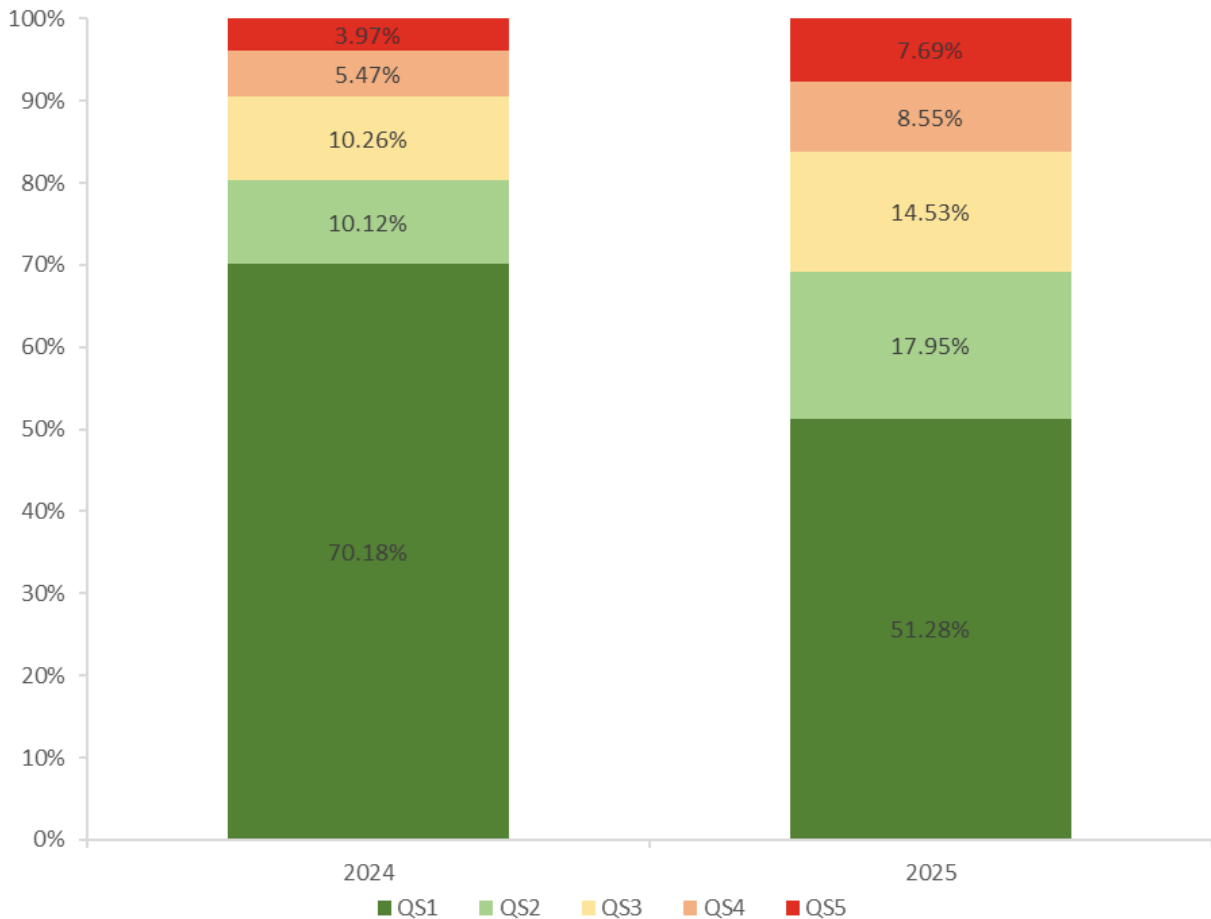


Figure 32: Routine 2% assurance check outcomes – all workstreams, between 2024 (1 March–31 December 2024) and 2025 (1 January–30 June 2025)



- 10.47** Figures 30, 31 and 32 clearly show that ARU missed its target of 90% of quality assured decisions scoring QS1 or QS2 in 2024 (1 March–31 December) and again in 2025 (1 January–30 June) both overall and separately for 100% checks and for routine sample checks.
- 10.48** The PAIR Quality Assurance Report for March 2024 to February 2025 noted a decline in quality of international and EUSS ARs over the reporting period. It warned that “there is a risk that errors in the original consideration are not identified and rectified.” The report highlighted a “significant decline” in the quality of EUSS decisions in May, June and August 2024 and advised ARU to take steps to “improve and stabilise quality for all case types” including international and EUSS.
- 10.49** Quality scores of QS1 or QS2 were considered to be a ‘pass’, while a score between QS3 and QS5 was a ‘fail’. Inspectors analysed the monthly ‘pass’ and ‘fail’ rates for EUSS, in-country, and international decisions between March 2024 and June 2025, excluding those subject to 100% checking. See Figures 33, 34 and 35.

Figure 33: EUSS routine QA pass and fail rates between March 2024 and June 2025

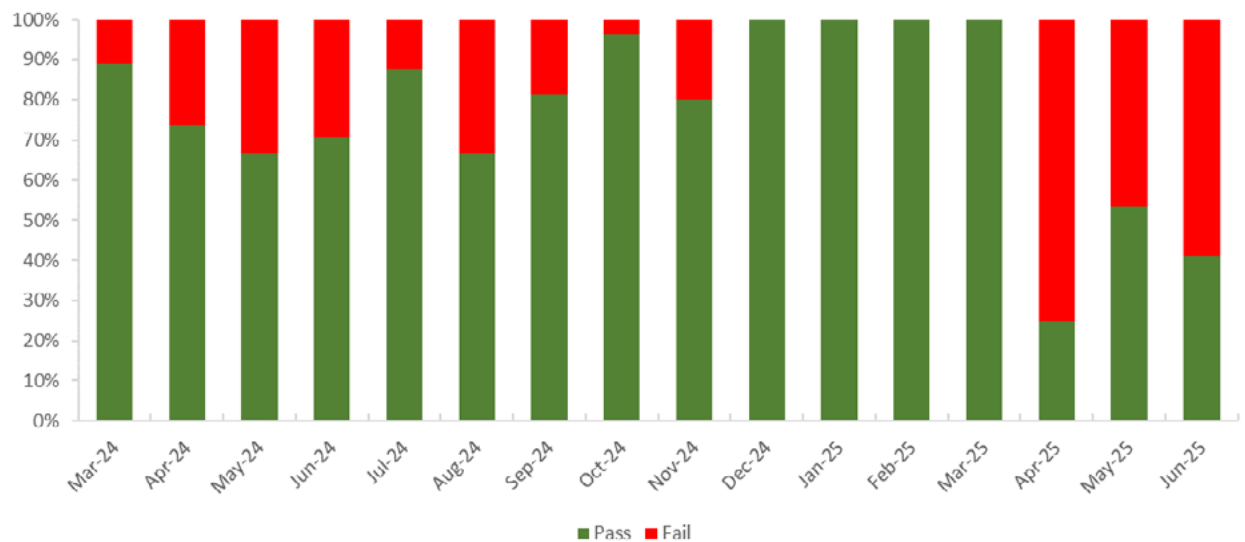


Figure 34: In-country routine QA pass and fail results between March 2024 and June 2025



Figure 35: International routine QA pass and fail results between March 2024 and June 2025



10.50 Inspectors noted that, between March 2024 and June 2025, EUSS decisions received more QS5 scores than international and in-country decisions. Caseworkers and SCWs told inspectors that EUSS AR casework was more complex, partly due to the fact that the route allowed applicants to provide additional evidence with their AR application.

Stakeholder views

10.51 Of the 24 responses received to the ICIBI’s call for evidence, only one referred to issues with the quality of the decisions made by ARU. This was from a representative of the education sector, who raised concerns about the consistency of decisions.

Consistency

- 10.52** In interviews and focus groups, ARU staff at all grades told inspectors that they tried to achieve consistency by referring to what they had learned in their training, and by consulting guidance and the Immigration Rules. Caseworking surgeries, a forum for decision makers and SCWs, also played an important role in the dissemination of guidance and information, alerting caseworkers to any changes in rules or guidance.
- 10.53** Staff were content that the ARU training and 'sign off' process had given them confidence that they were making consistent decisions.
- 10.54** Some decision makers raised concerns that, in the past, they had received inconsistent advice from SCWs. To address these concerns, SCWs held regular peer meetings where they discussed cases and the advice they would give to caseworkers. The most recent PAIR report highlighted the value of these meetings, which were said to "promote collaboration and consistency across the team".
- 10.55** Meanwhile, ARU staff had created a guidance page in SharePoint which stored all the information caseworkers needed to refer to when making decisions. Where further clarification was needed, staff were encouraged to refer to SCWs using a query form which set out the nature of the enquiry and the areas of guidance the caseworker had already referred to.
- 10.56** Inspectors found that SCWs were open to feedback from caseworkers, particularly where two SCWs had provided conflicting advice. In such circumstances, the two discussed the applications and agreed a position, and cascaded the result. Inspectors were told that this was possible as the SCWs "got on really well with each other", which allowed them to challenge each other in a constructive fashion.
- 10.57** HEO SCWs held a twice-weekly team meeting where any consistency concerns could be raised for discussion. If necessary, they were able to escalate questions to the SEOs, or other senior managers, for clarification.
- 10.58** SEO SCWs told inspectors that they would use caseworker feedback and the consistency queries that had been escalated to them to inform the conversations that they had with their HEOs. This helped to improve the consistency of advice provided by the whole senior caseworking team.

Addressing quality issues

- 10.59** As directed by the QA SOP, quality assurance checks are conducted prior to the decision notice being sent to the applicant. Senior caseworkers told inspectors that, if the overall quality of an AR was assessed as 'negative' (by scoring QS3, QS4 or QS5), it would be returned to the caseworker with tracked changes, suggested amendments and comments. A copy of the DQAT assessment and written feedback would also be provided.
- 10.60** Caseworkers were required to read and address the comments and suggested amendments before resubmitting the amended AR to the same HEO SCW. This process continued until the SCW was content that the AR met the required standard and the decision could be despatched to the applicant.

10.61 The process for ARs assessed as QS1 or QS2 was more straightforward. Caseworkers still received a copy of the DQAT assessment and any suggested amendments and comments, but they were able to issue their decision without the need for further checks by the SCW.

Inspectors' assessment of decision quality

10.62 Inspectors requested a sample of 121 AR applications (71 international, 29 EUSS, and 21 in-country) in order to examine the decision notices. From the list of 121 applications, inspectors were unable to examine seven: one reference number provided did not relate to an AR application; one AR had not yet been concluded; two applications were withdrawn prior to a caseworker making a decision; and in three cases inspectors could not locate the decision letter on Home Office IT systems.

10.63 Inspectors found no errors in 80 of the 114 AR decision notices that were examined. In the remaining 34, 29 contained spelling and grammatical errors and five included unnecessary repetition, or a lack of clarity in the decision notice.

10.64 In one of the 114 applications in the sample, inspectors had concerns about the reasoning behind the decision.

10.65 In some instances, caseworkers had changed the Immigration Rules paragraph number referenced in the original decision without sending the decision back to the original decision-making team for a reconsideration. Caseworkers told inspectors that, where the explanatory statements included in the original decision notice justified the reasoning behind the decision, they were able to amend 'typos' such as a wrong paragraph number.

10.66 Caseworkers had raised this with SCWs, who had given their permission to handle ARs in this way.

10.67 Inspectors asked the Home Office for a copy of the guidance that explained what constituted a 'typo' and in what circumstances a new AR application would be appropriate where an error in the paragraph number had been corrected.

10.68 The Home Office stated:

"Typographical errors are not covered specifically in the Admin Review guidance. Non-material errors are covered in the guidance on administrative review in the context of the EU Settlement Scheme, reflecting the broader scope of that scheme.

In such cases, an Admin Review caseworker must decide whether any error found in an initial decision is material and could change the original outcome. In the instance where the initial decision explains why an applicant does not meet the requirements referring specifically to the content of the relevant rule(s), but states the wrong rule number, the error is not considered material and may be corrected by the AR caseworker. This would not give rise to a fresh right of AR as a new refusal reason has not been given: the applicant has seen the reasons for the refusal of their application and has had the opportunity to challenge them.

Conversely, if the AR caseworker finds upon review that the applicant was refused under an incorrect rule in the consideration of the initial decision, or the reasons for refusal under the correct rule were not appropriately explained, then this would be a caseworking error

under the immigration rules and correcting this may constitute a new refusal reason and therefore generate a fresh right of AR.”

- 10.69** The response went on to note that the issue raised by inspectors had highlighted that more clarity was required around non-material errors “to bring consistency in Admin Review decision making”. Moving forward, ARU committed to working with administrative review policy colleagues to cover non-material errors in AR guidance, with the aim of publishing the new guidance by the end of October 2025.

Efforts to improve decision quality

- 10.70** In interviews and focus groups, caseworkers told inspectors that the ARU QA process was designed to help improve their performance and quality of their decisions rather than to punish them for any errors they made. They believed this encouraged genuine improvement. One caseworker said:

“I think it’s one of the best processes I’ve seen within the Home Office. You receive feedback to take on board in future cases. We sometimes ask for our cases to be sampled.”

- 10.71** In addition to the QA process, ARU worked to improve the quality of the decisions through the provision of additional training to caseworkers who needed it, and by the analysis and presentation of the DQAT scores in a monthly ‘Administrative Review Unit Quality Report’. This report was for all three ARU workstreams and covered 100% and routine QA sampling rates and the results of the QA that had taken place, including any themes the process had highlighted, and any remedial action taken.
- 10.72** Inspectors examined a copy of the report and noted that it recorded details of the training that had been delivered by the SCW team that month, along with updates and instructions the team had issued.¹²¹ SCWs told inspectors that they “would be lost” without the QA process and DQAT. These tools allowed them to build on the foundations laid by their initial training.

Previous ICIBI recommendation

- 10.73** In its 2019 inspection of ARs, the ICIBI recommended that the Home Office should:

“review the quality assurance regimes for all types of eligible decision, ensuring that where dip sampling is used the sample size is sufficient to provide a high ($\geq 95\%$) level of confidence, and that where decisions rely on a credibility assessment 100% are quality assured by a manager before the decision is dispatched.”¹²²

- 10.74** The Home Office partially accepted this recommendation, responding at length:

“The UKVI Operational Assurance Strategy is currently being reviewed in line with recommendations made in the Windrush Lessons Learnt Review. The findings of the ICIBI in this inspection will also be considered as part of this review.

The current UKVI Operational Assurance Strategy mandates the minimum volume of sampling is 2% of decisions made. The strategy also states the 2% sample must contain a representative quantity from the full range of decisions made. The 2% value was introduced

¹²¹ Operational Policy Instructions within the Home Office provide guidance and procedures for staff to follow when making a decision. The aim of the instructions is to ensure the consistent application of policies, procedures, and legal frameworks.

¹²² ICIBI, ‘An inspection of Administrative Review’, May–December 2019.

in 2014 following consultation with what was then called 'Home Office Science'. Their analysis of the decision types, volumes and subsequent decision to suggest 2% was set against a confidence level of 95%.

The training of UKVI (UK Visas and Immigration) decision makers includes formal training followed by a period of mentoring which includes a 100% check of their decisions. Only when a case worker consistently meets the required standard is the number of checks against them reduced to fall in line with the 2% random sampling required by the UKVI Operational Assurance Strategy.

The resource requirement to deliver a full Quality Assurance check on 100% of eligible decisions where credibility is a factor is considered to be disproportionate and could impact negatively on current service standards. UKVI will however consider increasing the volume of Second Pair of Eyes (SPoE) checks using a risk-based approach."

- 10.75** Inspectors did not observe any SPoE checks first hand, but SCWs said that mentors would SPoE the new starter's work before it was sent to them for 100% checks. No further SPoE checks were undertaken.
- 10.76** The CSG Quality Assurance Strategy effectively replaced the UKVI Operational Assurance Strategy. As previously noted, in July 2023 the Quality Assurance Strategy removed the fixed 2% sample and introduced a more targeted approach, with a focus on 'high-risk functions'. It is unclear whether AR decision making is regarded as a high-risk function. However, the ARU has retained 2% random sampling as a target across all workstreams, alongside 100% checking of staff still under training, and bespoke arrangements for individual caseworkers. While new caseworkers had mentors, and others actively sought advice from SCWs, the ARU did have a risk-based SPoE process.
- 10.77** But ARU was failing to achieve 2% consistently across the reporting period. While the reasons for this may be accepted (the onboarding of new staff), the argument that the additional 100% checking can be netted off against the shortfall in 2% routine checking does not stand up. Both are important to maintaining the overall quality of AR decisions, but they serve different purposes. While PAIR seemed to accept the idea that more 100% checks could compensate for fewer routine checks, the Quality Assurance Report for March 2024 to February 2025 noted that the inconsistent and small sample sizes of the latter posed a risk that the correct AR decisions were not being made, and that ARU may not have a comprehensive view of quality across the business if sampling levels remain inconsistent. It warned "If this inconsistency continues it may become impactful on the overall assurance rating for the unit."

11. Inspection findings: Engagement

Internal engagement

11.1 The Home Office’s written evidence, along with evidence gathered from interviews and focus groups, suggested a generally good level of engagement between the Administrative Review Unit (ARU) and other Home Office teams, as summarised in Figure 36.

Figure 36: Internal engagement

| Forum | Remit | Attendees | Frequency |
|---|---|--|-----------|
| Appeals, Litigation and Administrative Review (ALAR) Assurance Board¹²³ | <ul style="list-style-type: none"> To provide updates on assurance practices, share feedback, error trends, and assurance scores | <ul style="list-style-type: none"> ALAR Grade 7 managers For Grade 6 managers attendance is optional | Quarterly |
| ALAR Monthly Risk Network Meeting | <ul style="list-style-type: none"> To share and review risk registers and best practice, so emerging issues can be identified | <ul style="list-style-type: none"> ALAR Grade 7 managers Attendance is optional for Grade 6 managers, and some Senior Executive Officers (SEOs) attend “on occasion” | Monthly |
| Assurance Boards for British National (Overseas) (BN(O)), Euro, Settlement and Study | <ul style="list-style-type: none"> To discuss assurance and highlight any concerns over decision quality | <ul style="list-style-type: none"> SEOs and Higher Executive Officers (HEOs) from ARU Representatives from across the BN(O), Euro, Settlement and Study commands Policy, Performance Assurance, Improvement and Risk (PAIR) | Quarterly |

¹²³ ARU is part of Appeals, Litigation and Administrative Review (ALAR). ALAR sits within the Customer Operations Support Services command, which is part of the Home Office’s Customer Services Group (CSG).

| Forum | Remit | Attendees | Frequency |
|---|--|---|------------|
| EUSS (EU Settlement Scheme) Virtual Litigation Team meeting | <ul style="list-style-type: none"> To provide updates on ongoing litigation and appeals, and discuss impacts of concluded litigation or appeals To identify upcoming trends or potential risks | <ul style="list-style-type: none"> SEOs from ARU Appeals Policy, ALAR, EUSS Post Decision Casework | Quarterly |
| Policy ‘catch up’ calls | <ul style="list-style-type: none"> To review and discuss issues with current guidance, policy, rules and complex cases To highlight upcoming changes in guidance, policy and rules | <ul style="list-style-type: none"> Members of the senior management team in ARU and Appeals Policy | Bi-monthly |
| Future Borders and Immigration System (FBIS) Business Change¹²⁴ | <ul style="list-style-type: none"> To provide updates to business areas on FBIS’s current projects | <ul style="list-style-type: none"> Grade 7 and SEO from ARU FBIS programme leads Representatives from immigration decision-making teams across the Home Office | Monthly |

Business change

- 11.2** The Appeals, Litigation and Administrative Review (ALAR) Risk Register, dated February 2025, noted that one of the senior managers in ARU was “to attend monthly FBIS [Future Borders and Immigration System] call and relay further info on all new developments, monitoring scheduling of AUK2 [Access UK2] expansion through GAE [Government Authorised Exchange] and Skilled Worker Routes”. ARU senior managers had identified the need to do so to mitigate the risk “that new FBIS immigration routes being launched results in significant operational impacts.”
- 11.3** The ALAR Risk Register, dated June 2025, noted that recent developments in policy making for new routes had shown that there was a lack of consultation with ALAR on the impact of planned changes. Specifically, it noted that the right of administrative review (AR) “was introduced to new Appendix Gurkha/Hong Kong British National (Overseas) (HK BN(O)) routes in the autumn rules changes without consultation.” Although marked as “recent developments” in the June 2025 Risk Register, the HK BN(O) and Gurkha routes were introduced in 2021 and 2023 respectively.
- 11.4** ARU managers referred to these two routes being added without consultation and at short notice. One manager told inspectors: “Processes are lacking; the unit is often surprised by new routes.” Another said: “There are also changes we don’t know about ... the biggest effect most recently was the Gurkha route.” An ARU senior manager agreed that more could be done to learn about the proposed introduction of new immigration routes. Meanwhile, policy staff

124 According to GOV.UK, FBIS is “an ambitious transformation programme” which is “structured into three packages of programme deliverables”. <https://www.gov.uk/government/publications/home-office-major-projects-appointment-letters-for-senior-responsible-owners/future-borders-and-immigration-system-fbis-simplify-and-enable-programme-sro-appointment-letter-may-2022-accessible>

highlighted that there were only two points in the year when rule changes were made, autumn and spring, which meant that there was “usually” a long lead for any change, and this should allow plenty of time for ARU to prepare.¹²⁵

- 11.5** Inspectors examined the minutes of the FBIS Business Change meetings covering the period April 2023 to March 2025. According to the minutes, AR was not mentioned specifically in any of the meetings, although plans to introduce new immigration routes and make changes to existing routes were discussed.

Team meetings

- 11.6** ARU SEOs and Grade 7s met daily. Discussions included staffing, training needs, recruitment, performance data and upcoming office attendance.¹²⁶
- 11.7** Each ARU workstream – EU Settlement Scheme (EUSS) in-country and international – held a weekly meeting for all staff, where team leaders provided updates on the “weekly stats” and “celebrated the wins despite the backlog”.
- 11.8** Senior caseworkers (SCWs) held ‘surgeries’ to update on guidance, policy, complex cases and any feedback that had been discussed in meetings with the teams making the original immigration decisions.
- 11.9** Caseworkers were positive about the surgeries, which allowed them to raise questions on difficult cases, discuss “grey areas” and help to promote consistency in decision making. The meetings were also an opportunity to identify training needs, and for SCWs to provide refresher training. However, the delays in application processing times meant that caseworkers received updates which they would not need to apply for some time.
- 11.10** The frequency of these surgeries varied by workstream. EUSS surgeries took place weekly due to the complexity of casework. International surgeries were every two to three weeks, and in-country surgeries every one to two months. Staff told inspectors that the international and in-country surgeries were less frequent as these workstreams were more established.
- 11.11** Overall, ARU staff felt supported and valued for the work they did. One team member told inspectors: “I’ve worked in the Civil Service for over 20 years and coming to this department I’ve been recognised the most; that’s a reflection of the managers recognising and valuing your work. It’s always appreciated.”

External engagement

- 11.12** Inspectors asked about ARU engagement with external stakeholders. A senior manager said that they had attended some stakeholder sessions, when asked, but ARU was not proactive in seeking stakeholder engagement.
- 11.13** The Senior Civil Servant lead for ALAR acknowledged that this was an area for improvement, identifying that better engagement could help improve the quality of AR applications.

¹²⁵ In its factual accuracy response, the Home Office stated: “Rules have been changed more than twice a year this year and rules changes can happen more often than twice a year.”

¹²⁶ At the time of the inspection, Home Office staff worked a hybrid pattern with a requirement to be in the office 60% of the time.

Complaints and correspondence handling

- 11.14** The Home Office provided data for customer complaints relating to ARs received between 1 March 2024 and 28 February 2025. Responsibility for receiving and responding to complaints fell to the UK Visas and Immigration Correspondence and Complaints Team. However, this team relied on business areas, such as ARU, for agreed 'lines to take' when responding to complaints. In ARU's case, this was particularly true in relation to delays in processing times.
- 11.15** According to the data, between 1 March 2024 and 28 February 2025, the Home Office received 288 complaints that were either confirmed as being "in relation to AR" (242) or "possibly related to AR" (46). However, a note accompanying the evidence return stated "There is no uniform method for recording the nature of complaints or attributing the response to the business area, leading to low confidence in the data reliability."
- 11.16** The majority (191 or 79%) of the 242 confirmed AR complaints related to delays. A further 21 were marked under three headings referencing delays – "Delay and poor communication", "Delay and expedite", and "Refund delay". The reasons for the remaining 30 complaints included "dispute decision", "decision notice not received", "visa and leave entitlements", "withdraw or cancel application".
- 11.17** The data recorded the outcome of the complaint as either "upheld", "not upheld (rejected)", "partially upheld" or "no outcome". Most (200 or 83%) of the 242 were "not upheld". Twenty were "upheld"; 12 were "partially upheld"; and ten were "no outcome" with the "date complaint responded to" left blank. All ten "no outcome" complaints had been marked "case closed", although five had "00/01/1900" as the date of closure.
- 11.18** In August 2025, the Home Office provided complaints data for the period from 1 March to 30 June 2025. This contained 175 entries.
- 11.19** The data was presented in a different format from the earlier data, making any comparative analysis difficult. None of the 175 entries were recorded as 'possibly related to AR', implying that they were all confirmed as 'in relation to AR'. As with the previous data, most complaints concerned delays.

Complaints sample

- 11.20** Inspectors examined a sample of 26 complaints selected at random from those received between 1 March 2024 and 28 February 2025 and marked as 'in relation to AR'. These complaints related to immigration applications lodged between 21 June 2021 and 12 February 2025.
- 11.21** Several of the complaints highlighted the consequences for the complainant of errors in immigration decisions, such as the wrong conditions or leave entitlements, and the subsequent delays in processing their AR application. Complainants referenced missing their university course start date, experiencing difficulties with permission to work in the UK, and the impact on their physical or mental health. Of the 26 complaints, 21 raised concerns about the time taken to process ARs.
- 11.22** The Home Office had responded to all but three of the 26 complainants within the complaints-handling service level agreement of 20 days. The cases that fell outside of the agreement were

responded to on day 21. Of the 26, 17 were “not upheld”; eight were “upheld”; and one was “partially upheld”.

- 11.23** Inspectors found that most responses relied on generic lines, which included a request to “not contact the Admin Review Team unless your circumstances are urgent or exceptional to allow us to continue processing applications at this busy time.” Despite spanning the period March 2024 to January 2025 six of the 26 referred to “unprecedented levels of applications being received”, which were causing “a delay to our usual service” or “a delay to expected decision times.” Two responses, dated September 2024 and January 2025, referred to “a significant increase in applications across immigration routes since early January 2021.”
- 11.24** Other responses, sent to complainants between March and December 2024, referred to resources being increased in ARU to address the higher volumes of applications.
- 11.25** Eight of the responses referred to applications taking 12 or 24 months to process but gave no specific timeframe for a decision for the complainant’s AR application. Again, they included generic lines thanking the complainant for their patience.
- 11.26** Managers in ARU confirmed that the complaints correspondence was referred to them for ‘lines to take’, but the UK Visas and Immigration Correspondence and Complaints Team was responsible for replying to the complainant. When asked about the reference to “a significant increase in volumes since 2021” in a letter drafted in January 2025, a senior manager acknowledged that “it doesn’t look good to hark back to 2021”. They advised that the ‘lines to take’ had been updated and should no longer refer to 2021.

Stakeholder feedback

- 11.27** Nearly half of the submissions to ICIBI’s call for evidence highlighted poor communication from ARU. Communication with those with outstanding ARs was described as “minimal”, and correspondence, where received, was “generic and did not provide any clear updates or timelines”.
- 11.28** One stakeholder called for “meaningful case updates rather than automated responses that do not address individual concerns.” Another reported that where AR applicants contacted their MPs about delays, the MP received “the same template correspondence” referring to the increase in applications across immigration routes, which was causing a delay in expected decision times.
- 11.29** A respondent who had made an AR application wrote that:

“The administrative review itself took over two years to complete, with the Home Office repeatedly extending the stated deadline when it was reached. This unreasonably long delay effectively denied me my rights, and my requests for updates throughout this period were consistently ignored.”
- 11.30** Other respondents also wrote about the impact the delays were having on them. They felt that their lives were effectively “on hold” while they waited for the outcome of the AR. One stated: “I feel trapped in a cycle of inaction, left to bear the consequences of the Home Office’s failures.”

11.31 Applicants for an EUSS AR highlighted the stress, anxiety, and emotional toll caused by the protracted wait for a decision:

“EU citizens awaiting an administrative review decision are in limbo and worried about how long they can remain in the UK and so are unable to get on with their lives and make plans.”

11.32 Delays in EUSS cases were also cited as having an impact on an applicant’s ability to access free medical treatment, the right to work and rent, and access to benefits. Others reported problems with being stopped at the border and their digital status not showing that an AR was pending.

Automated updates to customers

11.33 Home Office ‘Administrative Review: caseworker guidance’, published on GOV.UK and last updated on 9 April 2025, states that “Where an application for administrative review has been outstanding for 6 months you must contact the applicant with an update. You should do this by email. Further notifications must be sent at every subsequent 6 months while the administrative review is still outstanding using the contact email provided by the applicant.”¹²⁷

11.34 In order to identify outstanding applications, ARU used Access UK reports to find all AR applications made within the last six months.¹²⁸ This application data was cross-referenced with the ARU control sheets to identify “only incomplete applications”, which in turn produced a dataset for each workstream of pending AR Unique Application Numbers with corresponding email addresses.

11.35 The datasets were uploaded onto the Notify system, which is hosted on GOV.UK, to “bulk notify” all those applicants.¹²⁹ A manual check was then undertaken to identify any emails that failed to deliver, and the Workflow Team was tasked with checking Atlas or Central Reference System (CRS) records for an alternative email address. Where an alternative email address was found, a member of the Workflow Team would resend the email, and a copy of the message would be retained on Atlas or CRS. Delay notifications sent out in bulk were not logged on Atlas or CRS.

11.36 In April 2025, the Home Office shared copies of the delay notification messages with inspectors. The messages were similar to the responses provided to complainants, referencing increased application volumes and increased resources. See Figure 37.

¹²⁷ Home Office, ‘Administrative review: caseworker guidance’.

¹²⁸ Access UK is an online application service for individuals wishing to apply for permission to enter or stay in the UK, or for the submission of an AR application.

¹²⁹ GOV.UK Notify is a cross-government platform that allows public sector bodies to send formatted correspondence to the general public via email, letter or SMS message. <https://www.notifications.service.gov.uk/features>

Figure 37: Delay notification messages for EUSS, in-country and international

| Workstream | Message |
|----------------------|--|
| EUSS | <p>We apologise for the delay in considering your application.</p> <p>Administrative Review has seen a 50% annual increase in applications across numerous immigration routes, including EUSS, which is causing a delay to expected decision times. Resources have been and continue to be increased in order to address the significant demand.</p> <p>Applications are allocated chronologically to conclude in the fairest way and are allocated for review as quickly as possible.</p> <p>Currently it can take 30 months or more to receive the result of your administrative review.</p> <p>Your Certificate of Application (COA) remains valid whilst your administrative review is pending, but please consult your COA if you are considering travelling out of the UK.</p> <p>UK Visas and Immigration and EUSS officials are aware of the delay to administrative review applications, and GOV.UK will display the latest expected turnaround times.</p> <p>Please do not contact the Admin Review Team unless your circumstances are urgent or exceptional to allow us to continue progressing applications at this busy time.</p> |
| In-country | <p>We apologise for the delay in considering your application. Administrative Review has seen unprecedented levels of applications across immigration routes which is causing a delay to expected decision times.</p> <p>Resources are being increased in order to address delays and we aim to work through applications in turn and as quickly as possible.</p> <p>Applications will be reviewed according to the relevant rules at the time of initial application, and the final decision will not be affected by the delay.</p> <p>Please do not contact the Admin Review Team unless your circumstances are urgent or exceptional to allow us to continue progressing applications at this busy time.</p> |
| International | <p>We apologise for the delay in considering your application.</p> <p>Applications are allocated chronologically to conclude in the fairest way and are allocated for review as quickly as possible.</p> <p>Applications will be reviewed according to the relevant rules at the time of initial decision and the final decision will not be affected by the delay.</p> <p>GOV.UK pages will display the latest expected turnaround times. Please do not contact the Admin Review Team unless your circumstances are urgent or exceptional to allow us to continue progressing applications at this busy time.</p> <p>Thank you for patience in this matter.</p> |

- 11.37** It was unclear to inspectors when the messages had been drafted, but the EUSS notification referred to “a 50% annual increase in applications across numerous immigration routes, including EUSS”. This route closed in April 2024.
- 11.38** In conjunction with the emails, ARU had arranged for messages to be displayed on GOV.UK giving indicative timelines for the processing of ARs. As at 1 September 2025, EUSS applicants were being advised “We have experienced unprecedented levels of applications which are causing a delay to our service. It can take 30 months or more to receive a result. If we have not made a decision within 6 months, we’ll contact you to update you on the situation.”¹³⁰
- 11.39** A similar message was displayed on GOV.UK for in-country, international and frontier worker applications, but with likely wait times of “12 months or more”.^{131,132} For service providers from Switzerland the timeline quoted was “18 months”.

Feedback loops

Customer insight data

- 11.40** Inspectors asked whether customer feedback was gathered to help drive improvements in the AR process. A manager told inspectors that ARU had begun discussions with the Contact Experience and Insight Team in Customer Operations Support Services in 2023 regarding a customer satisfaction survey. This was driven by a desire “to find out the perception of people using the AR process”.
- 11.41** ARU managers recognised that survey responses would be likely to reflect dissatisfaction with the AR process, as a lot of applicants were complaining. However, the managers were keen to hear where they were “doing things right”.
- 11.42** The ARU customer satisfaction survey went live in April 2024, but “teething problems”, following a system upgrade, prevented data from being collected for four months. Data reporting resumed in January 2025.
- 11.43** In August 2025, ARU told inspectors that it intended to use the feedback from the survey to focus on areas for improvement, for example, looking at whether decision letters “clearly explained the decision enough” or whether the guidance on GOV.UK was clear enough for applicants. Looking ahead, ARU planned to incorporate the insight data into monthly quality reports.
- 11.44** Inspectors were presented with the raw data from the survey for January to June 2025. The survey contained 12 questions, which can be found at Annex A.
- 11.45** In answer to “Was the guidance on how to submit Admin Review [sic] application clear and helpful on GOV.UK?” on average through the six-month period 77.76% of applicants responded positively. Similarly, 77.88 % of respondents were positive in response to “Did you find the Admin Review application submission easy to use/navigate?”

130 GOV.UK, UK Visas and Immigration, ‘EU Settlement Scheme: administrative review’. <https://webarchive.nationalarchives.gov.uk/ukgwa/20250211161950/https://www.gov.uk/guidance/eu-settlement-scheme-apply-for-an-administrative-review>, updated 10 February 2025.

131 GOV.UK, ‘Ask for a visa administrative review: If you’re outside the UK’. <https://webarchive.nationalarchives.gov.uk/ukgwa/20250813172129/https://www.gov.uk/ask-for-a-visa-administrative-review>

132 GOV.UK, ‘Ask for a visa administrative review: If you’re in the UK’. <https://webarchive.nationalarchives.gov.uk/ukgwa/20250813165208/https://www.gov.uk/ask-for-a-visa-administrative-review/if-youre-in-the-uk>

11.46 The survey also asked: “Was there a delay in receiving your decision?” Figure 38 shows the results, with a majority answering “No” in each month. The survey did not define “a delay”.

Figure 38: Customer insight survey responses to the question ‘Was there a delay in receiving your decision?’

| Month | Total number of responses | Yes | No |
|----------|---------------------------|--------------|--------------|
| January | 564 | 206 (36.52%) | 358 (63.48%) |
| February | 620 | 199 (32.10%) | 421 (67.90%) |
| March | 414 | 177 (42.75%) | 237 (57.25%) |
| April | 650 | 245 (37.69%) | 405 (62.31%) |
| May | 382 | 129 (33.77%) | 253 (66.23%) |
| June | 314 | 102 (32.48%) | 212 (67.52%) |

11.47 Respondents who said that they had experienced a delay were asked: “Did you receive any updates regarding a delay to your application?” Across the six months, only 30.06% on average had received any updates from the Home Office.

Feedback to decision-making teams

11.48 Inspectors asked ARU about feedback to original decision makers (DMs), and for any examples of improvements in decision making, guidance or training materials as a result of the feedback ARU had provided.

11.49 ARU produced copies of eight separate error reports used to provide feedback to EUSS, in-country, and international teams. The reports were categorised as ‘EUSS Error Report’, ‘Sponsored Work routes (Entry Clearance)’, ‘Sponsored Work routes (In-country)’, ‘Study (Entry Clearance)’, ‘Study (In-country)’, ‘Non-sponsored routes (Entry Clearance)’, ‘Non-sponsored routes (In-country)’ and ‘Other Reviewable routes (In-country)’.¹³³

11.50 The reports, produced in an Excel document, contained several fields, including statistics on case types, case reference numbers, AR outcome (for example, overturn, reconsideration, maintained), numbers and types of errors found, reasons for, and a brief description of, the errors, and any trends in error categories. An ARU SCW extracted the report data from the control sheets for each AR workstream monthly.

11.51 The error reports were shared each month with the original caseworking teams and post-decision teams.¹³⁴ As well as covering the latest month, they contained year-to-date information, allowing the original decision-making teams to monitor trends in errors, by application category and decision-making unit.

11.52 Inspectors examined the eight reports and noted that there were 14 different error types, four of which featured in all eight reports: documents overlooked, incorrect application of Immigration Rules, incorrect assessment of evidence and incorrect interpretation of guidance. Other error types varied according to the different reports. They included, evidential flexibility

¹³³ Other reviewable routes included domestic violence, retired persons, Hong Kong (British National Overseas) armed forces, armed forces Gurkha, Hong Kong veterans, stateless, UK Ancestry, and bereaved partner.

¹³⁴ Post-decision teams were located in the decision-making units and handled all tasks/activities once a decision had been made.

should have been used, error in assessment of genuineness, documents not retained and request for discretion not addressed.

- 11.53** In addition to the monthly error reports, representatives from ARU and the original decision-making teams participated in quarterly feedback calls to review any trends and recurring or recent errors identified at AR stage and identify how to improve decision making. In advance of the calls, ARU prepared a quarterly report, compiled from the monthly reports, and a PowerPoint presentation to highlight common errors to support their discussions. Minutes were taken at each meeting and shared with all attendees.
- 11.54** Inspectors reviewed the minutes from the quarterly meeting held on 27 February 2025 for the in-country and international teams. While separate sessions were allocated to each of the three areas – ‘non-sponsored work’, ‘sponsored work’, and study – the minutes were collated into one record and shared with all attendees.
- 11.55** The minutes recorded attendees, data on the number of ARs handled, and a breakdown of the common errors reported in the previous quarter (November 2024 to January 2025). They also referenced concerns raised by ARU, such as the quality of ‘genuineness interviews’, which were said by ARU to lack “questioning/probing responses”, and “typo” errors where an incorrect Immigration Rules paragraph number had been used.
- 11.56** Decision-making teams provided updates on actions taken in relation to errors that had been reported previously. They also highlighted changes to their staffing levels which could lead to increased outputs of study and work visa decisions, potentially impacting the volume of related AR applications.
- 11.57** ARU managers told inspectors that they would contact the decision-making teams outside of the quarterly feedback calls to highlight any trends or issues they had identified that needed quicker action.
- 11.58** Following the closure of the EUSS AR route, feedback calls in relation to EUSS decisions were absorbed into EUSS quarterly assurance boards. The email accompanying the EUSS error report provided to inspectors contained a note explaining that “most of the cases substantially worked have been historic due to the delays at AR and so the feedback may be against caseworkers no longer working EUSS or have already had similar feedback to make the necessary adjustments in subsequent cases”.
- 11.59** ARU’s written evidence contained examples of how the feedback they provided had led to improvements in decision making by other teams, including one where ARU had identified inconsistencies in the approach taken by DMs when applying Part 9 of the Immigration Rules relating to false representation and deception. After seeking advice from policy colleagues, ARU provided feedback to the relevant decision-making team via emails and conference calls. Subsequently, new interim guidance was issued, pending a review of published guidance. Feedback was also provided on the wording used in decision letters in relation to Part 9 of the Immigration Rules, and on the level of detail required in case notes to ensure that all the information was factually correct and accurate, and accessible to ARU caseworkers for the purpose of their review. In response to this feedback, representatives from the decision-making team undertook to raise the matter in team meetings and update training materials.
- 11.60** ARU also reported that it had identified a trend where applicants to the Short-term Student route were being refused solely for not providing information relating to the source of funds on which they were relying for their visa application. ARU noted that the DMs were not

applying evidential flexibility when assessing these cases. Again, policy advice was sought and shared with international decision-making teams, which led to changes being made in the use of evidential flexibility. ARU used the feedback calls to highlight the issue, linking in representatives from the initial decision-making teams and post-decision teams, and colleagues in litigation.

- 11.61** ARU told inspectors that their intervention had led to an improvement in decision quality for short-term students. This was supported by data from the error reports that showed that, following the changes, the error percentage rate fell from 65% (between August and October 2024) to 21% (between November 2024 and January 2025).
- 11.62** ARU gave a further example of where its feedback on errors had led to improvements. This involved child/parent sole responsibility cases. According to ARU, as well as improvements in case handling, the feedback had led to updates in guidance and a refresh of training delivered to initial DMs. The relevant decision-making team confirmed that, after receiving feedback from ARU, they had provided staff with additional training in the handling of sole responsibility cases.
- 11.63** Inspectors spoke to each of the decision-making teams to which the ARU provided feedback. Overall, they were positive about the feedback they received and gave their own examples of how they had used it to drive improvements within their work areas.
- 11.64** The level of detail within the monthly reports was considered helpful as the information was broken down by route and category of error, allowing managers in decision-making teams to “drill down” to see if there was a specific issue. By using this information, managers were able to feed information back to the post-decision teams and design training for the initial decision-making teams to “stop the error earlier in the process.”
- 11.65** Other teams reported that the level of detail in the monthly reports allowed them to see “what we are getting right and wrong” and to “tailor the quality assurance framework to use that second-line assurance from the ARU.” Meanwhile, the quarterly calls were a forum to discuss the feedback provided by ARU and to see if there were any trends or gaps in knowledge that could be resolved.
- 11.66** While the quality of ARU feedback was considered helpful, there were concerns over its timeliness, and thus the effectiveness of the error reporting. This was particularly problematic in relation to EUSS casework where AR applications were taking over two years to decide.
- 11.67** One ARU manager acknowledged the challenges caused by delays within the feedback loops, which meant that the caseworker who made the original decision might have left the department, or there may have been a change in the Immigration Rules and templates. As a result, “a lot of things are irrelevant now”. However, another commented:
- “We’re giving them feedback, which is repeated from previous months, and mostly that is because we are working cases that are nine months old. They’ve acted on it, but we’re still picking it up because we’ve got the backlog. But it does work, because when we get to the recent ones, the error has dwindled down massively. You see it working.”
- 11.68** Inspectors asked if information on processing times was provided in ARU reporting or in quarterly calls. ARU managers told inspectors that it was not part of the agenda, but it would be provided if requested.

Learning from litigation

11.69 The ICIBI’s 2019 ‘An inspection of Administrative Review’ recommended that the Home Office should:

“Ensure that all data and information relevant to demonstrating how the Administrative Review (AR) system is working, including related pre-action protocol (PAPs) or judicial review (JR) data, is routinely captured and analysed, and used to effect the continuous improvement of both ARs and original immigration decisions.”¹³⁵

11.70 This recommendation was accepted. In its published response, the Home Office wrote that:

“The Administrative Review Unit (ARU) will continue to develop and enhance its own databases and record keeping in order to capture information pertinent to the administrative review system. Furthermore, the Atlas casework database under development is expected to provide relevant data and information pertaining to the administrative review system. Development of Atlas for in-country casework is imminent and expected to be fully operational in late 2020. Atlas development for International casework is medium term, with an expected implementation date of 2021.”

11.71 Inspectors asked ARU for an update on this recommendation. In April 2025, ARU wrote:

“Litigation data is used to inform AR caseworkers of how AR decisions performed when challenged with litigation and highlight any specific issues where AR decisions have fallen down. Moving forward, Atlas will provide automation of the capture of AR data across all three workstreams and is expected to capture data on cases that have escalated to litigation.”

11.72 Inspectors noted that the ARU Assurance Strategy, dated 1 April 2024, referred to the planned use of litigation data from the ALAR Hub to extract quality trends and inform AR decision making, but this was “subject to Atlas and Vantage systems progression”. The strategy explained:

“Currently litigation data is held in Jira which requires an unfeasible level of work to manipulate to identify litigation cases with a preceding AR decision.”¹³⁶

11.73 Inspectors asked ARU managers if they monitored AR cases that were subject to pre-action protocol letters or judicial review claims to inform their learning. Their responses highlighted the challenges of obtaining any data due to the position with Vantage, which Home Office officials had been working to implement since 2021. In the meantime, an ARU manager reported that the information “was all on different systems that don’t talk to each other.”

11.74 In the absence of a reliable Vantage product, managers were dependent on information from ALAR’s Risk Registers and policy colleagues to learn about AR cases that had gone to judicial review. ARU managers reported that colleagues in the ALAR Hub provided some data, but it was “very resource intensive to analyse”, as a senior caseworker had to go through it on a case-by-case basis. ARU managers believed it was good to learn from judicial review cases to understand what the team had got right and where they had got it wrong.

135 ICIBI, ‘An inspection of Administrative Review’, May–December 2019.

136 Jira is a software tool used for project management.

11.75 A senior manager within ARU reflected on the low volume of judicial review cases received given the delays in AR processing times, particularly for EUSS AR applications, although they did not know the exact numbers. They said that they had asked to be informed of any judicial reviews on AR cases, which they would then review, as the managers reporting to them did not have a litigation background.

12. Inspection findings: Border Force Administrative Review Hub

Structure

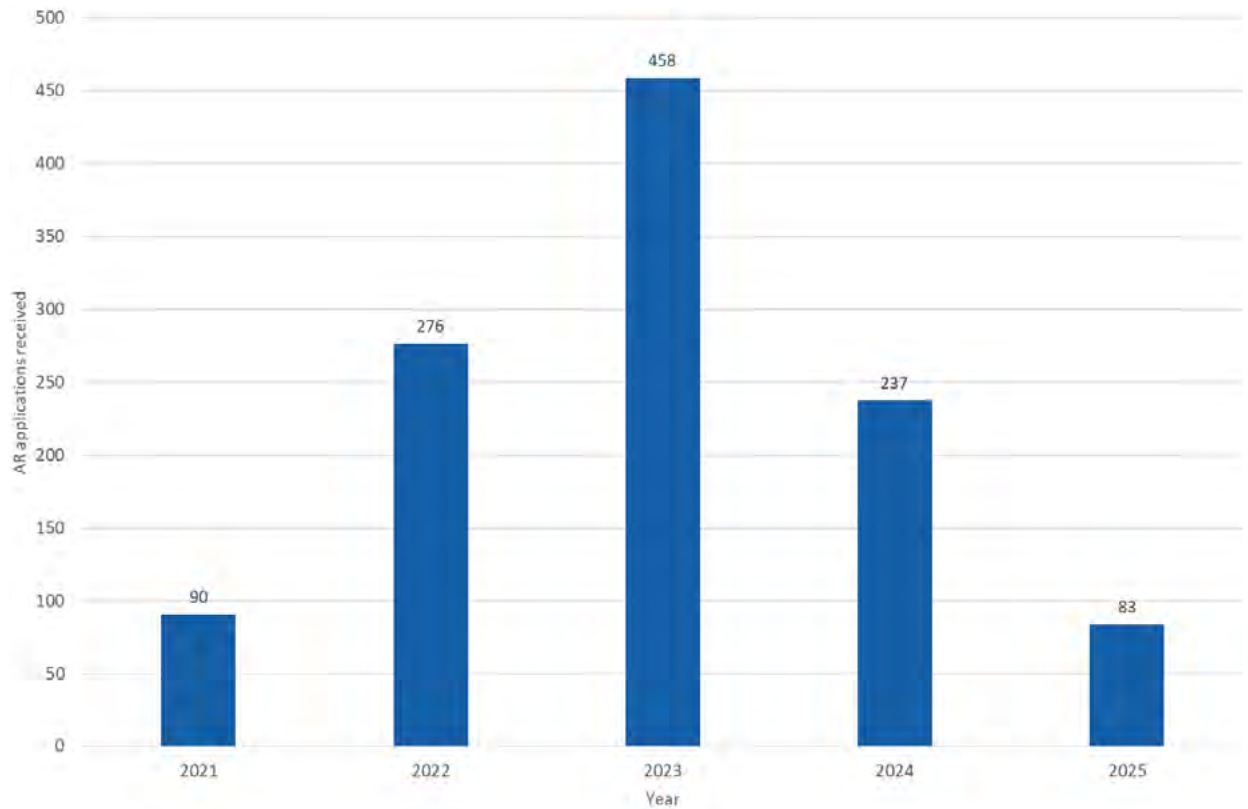
- 12.1** Administrative review (ARs) in Border Force (BF) are processed by the BF AR Hub, a small unit based at Glasgow Airport. When first established, the team reported directly to the Assistant Director (Grade 7) responsible for frontline immigration and customs operations at Glasgow Airport.
- 12.2** In May 2023, oversight of the team was moved on a temporary basis to the Chief Caseworker Unit, part of the Border Force National Operations command.¹³⁷ On 1 November 2024, it was moved on a permanent basis to the National Immigration Casework Oversight Team (NICOT).
- 12.3** As of July 2025, the team in Glasgow consisted of one Border Force Senior Officer (BFSO) and three Border Force Higher Officers (BFHOs). Administrative support was provided by a Border Force Assistant Officer, who worked remotely and was on a temporary secondment to the team.
- 12.4** Day-to-day management of the team was provided by the BFSO, with an Assistant Director in NICOT providing oversight. The Assistant Director told inspectors that this oversight was “minimal”, given the time-consuming nature of their other responsibilities and the experience of staff working in the BF AR Hub.
- 12.5** There had been little turnover of staff in the BF AR Hub. The BFSO and two of the three BFHOs had worked in the unit since it was created in 2021.

Workload and appropriate resourcing

- 12.6** The Home Office provided inspectors with a copy of the BF AR Hub’s internal spreadsheet used to manage its casework. Figure 39 shows the number of ARs received each year since 2021 according to the data contained in the spreadsheet.

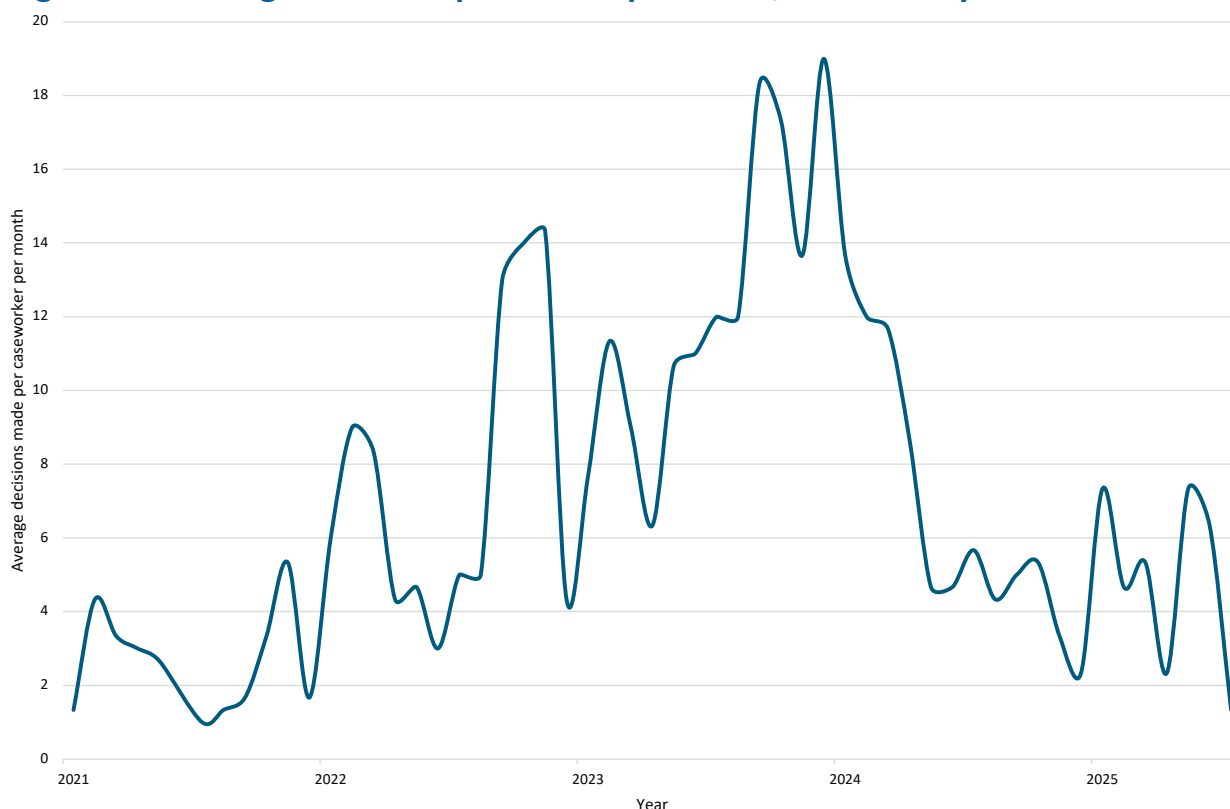
¹³⁷ The former name of the Border Force National Immigration Casework Oversight Team (NICOT).

Figure 39: Number of ARs received by Border Force, between 14 January 2021 and 30 June 2025



- 12.7** From information provided during this inspection, it appeared likely that the full year total for 2025 would be lower than 2024, continuing the downward trend in applications since 2023.
- 12.8** Inspectors asked the Home Office for details of the quantitative and qualitative targets for caseworkers in the BF AR Hub. The Home Office advised that the Hub did not work to quantitative/qualitative targets, but was committed to meeting “a strict” 28-day service standard for all AR cases.
- 12.9** In the absence of a quantitative target, inspectors divided the number of AR decisions made between 2021 to July 2025 by the number of BFHOs to produce a figure for productivity per BFHO over this period. See Figure 40.

Figure 40: Average decisions per month per BFHO, 2021 to July 2025



12.10 The productivity figure is only approximate as it does not take account of leave, sickness or other absences, or any other variables, but, with this caveat, it indicates that the average number of decisions per BFHO has fluctuated significantly from month to month, peaking at 19 in December 2023. Since April 2024, the average number of decisions made per month per BFHO has not exceeded 7.3. This compared with caseworker targets in the Administrative Review Unit (ARU) of between 8 and 15 decisions per week.

Service standard compliance

12.11 The BF AR Hub aimed to process all ARs within the 28-day service standard. Inspectors analysed the BF AR Hub internal spreadsheet and found that, between January 2021 and July 2025, the team had completed 95.54% of ARs within this service standard, suggesting it was comfortably resourced to meet demand.

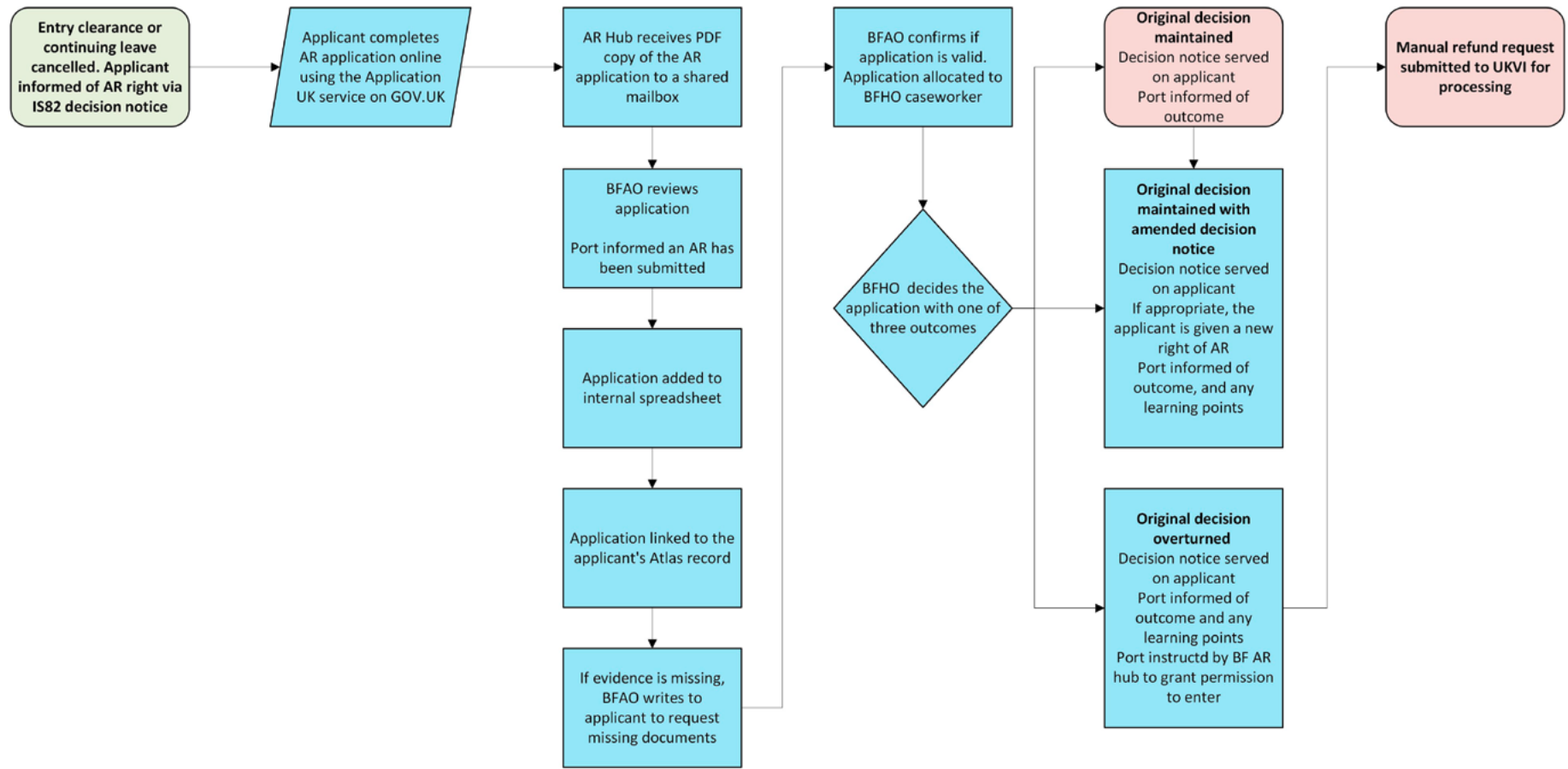
12.12 Senior managers responsible for the Hub thought staff might be underutilised. One manager told inspectors:

“To be perfectly honest, the flow is 20 to 30 cases a month ... I think a lot of cases take a couple of hours to a day or two max depending on the representations in the AR application ... Do we need this team to be solely dedicated to AR? I am not so sure we have got that balance right. We may need to find out what other work they can do.”

Workflow, triage and prioritisation of Border Force administrative review applications

12.13 Figure 41 provides a summary of the consideration process for valid BF AR applications.

Figure 41: Border Force AR process

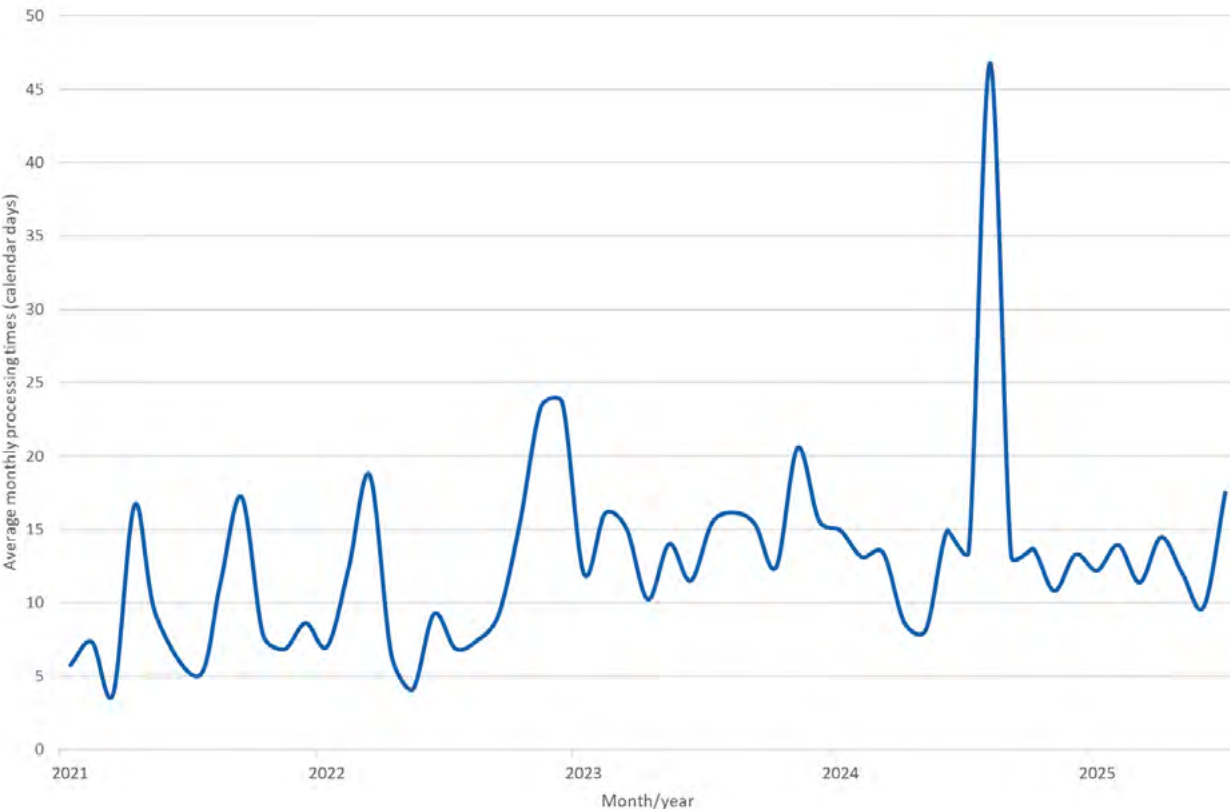


- 12.14** At the time of the inspection, the BF AR Hub did not have any formal triaging or prioritisation process for validating applications. Staff told inspectors that the only applications that were prioritised were where an applicant was in immigration detention. This was in order to “minimise time spent in detention for the applicant and potentially reduce detention costs for the department.”
- 12.15** Inspectors asked the BF AR Hub staff if there were any other factors that would lead to them prioritising an application, and were given examples of applications they had prioritised. These examples included serious medical issues, the elderly, and children due to sit their GCSEs.

Timeliness of Border Force administrative review decision making

- 12.16** As with ARU, invalid AR applications were not decided at the initial workflow stage, and all applications were allocated to a BFHO for consideration. However, unlike ARU, the BF AR Hub did not operate a work in progress queue as almost all applications, including invalid applications, were resolved within the service standard.
- 12.17** Inspectors reviewed BF AR Hub’s internal spreadsheet and calculated average monthly processing times for decisions made between 2021 and 2025. This data is summarised in Figure 42.

Figure 42: Average processing times for applications decided by the BF AR Hub January 2021 to July 2025¹³⁸



- 12.18** Except for August 2024, average processing times for decisions made by the BF AR Hub were all well within the 28-day service standard, while for most months since the start of 2023, the

138 Data provided by the Home Office did not include any ARs decided in June 2021.

average was between 10 and 15 days. The spike in average processing time in August 2024 was due to a single application, submitted in June 2023 and not resolved until August 2024.

Explanation of administrative review rights and waivers

- 12.19** AR rights are explained to potential applicants in an IS82 refusal notice, which is served on the person by a Border Force Officer at a port of entry. A person may waive their AR rights in accordance with AR4.3 of the Immigration Rules by completing an IS301 AR waiver form.¹³⁹
- 12.20** Internal Home Office Caseworker guidance titled ‘Administrative Review – dealing with applications’ required that all completed AR waiver forms be sent to the BF AR Hub, but Hub staff told inspectors that they did not always receive these forms. They also told inspectors that, in the past, they had concerns that, in a small number of cases, individuals may have been “coerced” into signing an AR waiver. This was reflected in the findings of internal audits by Border Force Operational Assurance Directorate (OAD) in 2021, where in three cases, “Case Information Database notes indicated potential coercion”. However, caseworkers in the Hub told inspectors that they felt things had improved and “...there are no longer complaints about coercion.”
- 12.21** To address perceived shortcomings with the IS301 form, and to ensure that AR rights were explained to applicants in a consistent way, BF at Heathrow Airport had introduced a Border Force AR waiver and explanation form. (See Annex B).
- 12.22** BF officers are required to record the language used when explaining the waiver and explanation form’s contents to a person. The form provided a detailed summary of the deadlines and the requirements for applicants to submit a valid AR.¹⁴⁰ The form also explained the circumstances in which an applicant’s AR application would be automatically withdrawn.¹⁴¹
- 12.23** The Home Office was unable to advise who had authorised the use of this explanatory form, or whether its contents had been approved by AR policy officials.
- 12.24** As applicants had between seven and 28 days to exercise their AR rights, there was no AR-related requirement for BF officers to ask applicants if they intended to exercise their AR rights at the time of the refusal decision. The Heathrow waiver explanation form asks: “Do you intend to make an application for an Administrative Review of the decision to refuse you entry to the UK? You do not need to make this decision today.” But it goes on to say (addressed to the BFO): “If the passenger states they do not intend to apply for an Administrative Review, complete the following section.”
- 12.25** The “following section” is an explanation to be read to the person by the BFO, which states: “By signing and dating this form you are agreeing to waive your right to AR. Once completed you will not be able to lodge an AR.”
- 12.26** Inspectors were concerned that the way the form was constructed could encourage some individuals to decide to waive their right to an AR at the time of the refusal, when they are

139 Immigration Rules, Appendix AR.

140 The deadlines to submit an AR are seven days for applicants in detention in the UK, 14 days for applicants granted Immigration Bail in the UK, or 28 days for applicants whose leave was cancelled at a Juxtaposed control. Juxtaposed controls “allow Border Force officers to check passengers and freight destined for the UK before they begin their journey”. <https://homeofficemedia.blog.gov.uk/2017/07/11/fact-sheet-the-uks-juxtaposed-border-controls/>

141 An AR application is deemed to be withdrawn if the applicant leaves the UK, submits a further application for entry clearance, leave to enter or leave to remain, or if the applicant signs a waiver form.

likely to feel stressed, rather than taking time to reflect and possibly to seek independent immigration advice.

Quality of decision making

12.27 Figure 43 provides a breakdown of BF AR outcomes between January 2021 and July 2025.

Figure 43: BF AR outcomes, January 2021 to June 2025¹⁴²

| | 2021 | | 2022 | | 2023 | | 2024 | | 2025 | |
|---|-----------|-------|------------|-------|------------|-------|------------|-------|-----------|-------|
| AR maintained | 38 | 43.7% | 147 | 53.8% | 273 | 61.2% | 146 | 59.3% | 60 | 60.6% |
| AR rejected | 28 | 32.2% | 52 | 19.0% | 79 | 17.7% | 48 | 19.5% | 20 | 20.2% |
| AR overturned | 9 | 10.3% | 48 | 17.6% | 54 | 12.1% | 26 | 10.6% | 6 | 6.1% |
| AR maintained – Refusal notice amended | 10 | 11.5% | 22 | 8.1% | 28 | 6.3% | 18 | 7.3% | 8 | 8.1% |
| AR withdrawn | 2 | 2.3% | 2 | 0.7% | 4 | 0.9% | 5 | 2.0% | 3 | 3.0% |
| Granted permission to enter by port | - | - | 1 | 0.4% | 5 | 1.1% | 1 | 0.4% | 1 | 1.0% |
| Void, as new refusal notice issued by port | - | - | 1 | 0.4% | 2 | 0.4% | - | - | - | - |
| AR overturned – port reconsideration | - | - | - | - | 1 | 0.2% | 1 | 0.4% | - | - |
| AR maintained – Refusal notice amended | - | - | - | - | - | - | - | - | 1 | 1.0% |
| NRM referral | - | - | - | - | - | - | 1 | 0.4% | - | - |
| Total | 87 | | 273 | | 446 | | 246 | | 99 | |

12.28 Inspectors examined a sample of 11 BF AR applications, decided between 1 March 2024 and 30 March 2025. This represented 5% of the 219 applications decided between these dates. Of the 11 applications, seven decisions to refuse entry were maintained, one was overturned, two were rejected and one was withdrawn by the applicant.

12.29 Inspectors identified quality issues in 10 out of the 11 decision notices. Eight had spelling or grammatical errors, two were insufficiently personalised to the applicant’s circumstances, and five contained other errors.

¹⁴² The year of decision in Figure 43 is based on outcome date, rather than application date.

12.30 In seven (63%) of the 11 cases, inspectors had concerns about the rationale articulated in the decision notice, including:

- three instances of maintaining a decision, while failing to resolve an incorrect application of the Immigration Rules
- an AR decision notice that advised the applicant that they had to leave the UK as they had no lawful basis to remain, despite the Home Office withdrawing the cancellation decision and re-instating the applicant's entry clearance prior to the AR consideration
- a decision notice advising an applicant that they had to leave the UK and had no lawful basis to remain, despite the applicant making the AR application from overseas
- a decision notice dated three weeks before the applicant arrived in the UK
- a decision notice that referred to an applicant's wife, when the applicant was married to a male partner
- an application where the applicant failed to submit AR grounds, and the AR decision maker adopted a speculative approach, assuming what the applicant's grounds were likely to be
- failure to address decisions where the IS82 cancellation notice did not evidence how an applicant had used false representations, failed to disclose material facts, or how their circumstances had changed.

12.31 Case study 4 is an example of inadequately articulated grounds for refusing an AR:

Case study 4: Failure to adequately articulate refusal grounds

The applicant arrived in the UK with a Skilled Worker visa and sought entry to work in the building trade.

The applicant's visa was cancelled on the grounds of "deception" under paragraph 9.7.1(a) of Part 9 of the Immigration Rules. This rule states:

"An application for **entry clearance, permission to enter or permission to stay** may be refused where, in relation to the application, or in order to obtain documents from the Secretary of State or a third party provided in support of the application:

(a) false representations are made, or false documents or false information submitted (whether or not relevant to the application, and whether or not to the applicant's knowledge)".

According to the file minutes and refusal notice, the evidence to support the decision was that the applicant's account lacked credibility because they were unable to give a coherent explanation of their employment history. Further, the Border Force Officer who made the decision concluded that there was evidence the applicant's employment history was fabricated to obtain an entry clearance, though it was unclear what this evidence was. The decision notice did not link the circumstances of the refusal to the statements on the visa application form (VAF) and relied on the applicant's lack of credibility on arrival.

The decision notice made reference to the applicant being "stressed" during further examination. This is reflected in the interview notes, and the interview had to be stopped at one point because the applicant was distressed.

In January 2025, BF received an AR application. This was within time and valid. The applicant stated that they had become confused at the airport as they struggled to understand the officer's English accent. They said they had experienced "stress and trauma mentally" and "fear" as it was their first time of travelling and there was a high level of security in the airport. The applicant submitted evidence of their employment history.

The AR decision notice upheld the original decision. Unlike the original immigration decision, it linked the passenger's statements on arrival to their VAF and concluded that the applicant's career history as reported did not accord with the career history recorded on the VAF.

The AR decision notice accepted that the situation could be stressful for a first-time traveller, but did not accept that this would prevent the applicant from answering questions satisfactorily.

The AR decision maker concluded that the officer had acted appropriately in cancelling the leave under 9.7.1(a).

ICIBI comment

Inspectors noted that in a NICOT newsletter article in February 2025, the Border Force Administrative Review (BF AR) Hub advised ports that leave must not be cancelled on the basis of false representations, using Paragraph 9.7.1(a) of the Immigration Rules, as this paragraph does not allow for the cancellation of a valid entry clearance. The original decision was therefore flawed.

Furthermore, the original decision relied on a lack of credibility in the applicant's account, rather than clearly articulated grounds of false representations, failure to disclose material facts or a change of circumstances.

The AR decision did not amend the incorrect paragraph of the Immigration Rules in the decision notice, and the AR process did not address and correct the caseworking errors. It therefore failed in its stated purpose.

Home Office response

The use of incorrect refusal paragraphs (9.7.1 in place of 9.7.3) is something which used to happen quite often. With feedback and the BF AR Hub re-issuing decisions it has thankfully improved across the board. In this case an e-mail was sent to the relevant case progression hub advising the incorrect refusal paragraph had been used in the initial decision and requesting corrective action.

When the case was reviewed it was felt it met the requirements for refusal and cancellation under 9.7.3 (a). The use of the incorrect refusal paragraph did not detract from an overall decision which we consider was correct and could be maintained. Before issuing the IS298 – maintained decision [the AR decision notice] confirmation should have been sought that a new decision was issued with the correct refusal paragraph as requested.

As a maintained decision this was subject only to a SPoE [second pair of eyes] check to ensure no obvious grammatical or spelling errors. This was not subject to further assurance.

The issue around the incorrect refusal paragraph was noticed immediately and highlighted to the relevant port by e-mail requesting corrective action was taken to address the error. That this was not done by port should have been noticed and this could have been corrected by way of a new IS82 and IS299 changed decision notice issued by the AR hub. This was an oversight and would have allowed the overall decision to be maintained and the error of the incorrect paragraph corrected.

12.32 Inspectors considered that the language used in some AR decision notices may have been difficult to understand for applicants with English as a second language, for example:

“Your interview clearly demonstrates your difficulties in interacting in the English language and that you do not possess the degree of fluency or spontaneity expected of this level. I am satisfied that you have been provided with a sufficiency and range of questions by the interviewing officer that they were entitled from the evidence collated to make such assessment of your abilities, something which despite the submissions of your representatives, is within their competence, and that of the Secretary of State, to do. Having reviewed the full case, I am satisfied that the Border Force Officer considered all the evidence and responses in your case, including that which favoured yourself, and was justified in making an assessment of your admissibility, which is a core function of the role of Border Force Officers.”

Record keeping

The use of an internal spreadsheet

- 12.33** The BF AR Hub processed applications using the Home Office’s primary caseworking system Atlas. In addition, BFHOs referred to information on the Central Reference System (CRS) for decisions involving cancellation of an entry clearance.
- 12.34** The BF AR Hub did not use the Daily Operations Dashboard in Atlas to manage and allocate work, instead using a local Microsoft Excel spreadsheet “to track, monitor and outcome all Border Force ARs received.” The Home Office told inspectors the BF AR Hub considered this a more effective means to manage applications.
- 12.35** Inspectors examined a copy of the spreadsheet. Data integrity was very poor, with a lack of basic data validation. BF AR Hub staff were able to enter data freehand, with no validation rules to limit inputs to set categories or criteria. For example, ‘Manchester Terminal One’ was recorded in five different ways. Application outcomes were recorded differently. For applications that were ‘Changed and maintained’ the outcome was recorded in seven different ways. Inspectors also noted ten different ways to record ‘Skilled Worker and dependants’. Several date errors were identified in the data, such as obviously incorrect dates (applications validated in 2002), incomplete dates, and 16 instances where the validation date was earlier than the application date.
- 12.36** The structure of the spreadsheet made the process of extracting data difficult, while the variations and errors in the data made it hard to obtain any meaningful management information (MI) from the spreadsheet. BF AR Hub staff told inspectors that MI was extracted from the spreadsheet, but only in response to specific requests, at which point they would correct any data errors they found prior to submitting a return. The Hub staff did not use the Vantage MI platform and told inspectors: “We have to keep the spreadsheet as we don’t trust the Vantage data.”¹⁴³
- 12.37** Inspectors found that key information about AR applications was not recorded on the spreadsheet. For example, in one instance, an applicant had failed to provide any AR grounds and the BF AR Hub had written to the applicant’s representative to ask for the grounds, but it had not received a reply. The lack of grounds and the request for additional information were not recorded on the spreadsheet. Inspectors asked the Home Office for an explanation. It responded:
- “Individual BFHO caseworkers are responsible for their own workload and managing the cases within. Only when cases are being passed off due to annual leave, etc, would information on case progression be passed to another caseworker. The spreadsheet is not routinely updated with this type of information to ensure that it does not become ineffective due to too much information or notes being added to this medium.”
- 12.38** Inspectors noted that the spreadsheet did not contain applicant data on the protected characteristics commonly captured during immigration applications, including nationality, age (date of birth) and sex. When asked why this information was not recorded, a member of the Hub staff told inspectors: “We had to take that data out, as OAD [Border Force Operational Assurance Directorate] asked us to.” OAD told inspectors: “We did point out that they didn’t

¹⁴³ In its factual accuracy response, the Home Office stated: “AR data for Border Force on Vantage is not reliable due to known technical issues relating to the application process.”

need that personal information in the locally held spreadsheets, as all that information is in the system [Atlas] anyway.”

- 12.39** Since the BF AR Hub did not use Vantage it had no way of extracting diversity data from Atlas, raising concerns that managers would be unable to identify any emerging or unforeseen diversity impacts arising the Hub’s work. At the time of the inspection, no equality impact assessments had been completed in respect of the BF AR Hub.

Storage of applicant supporting evidence

- 12.40** The Immigration Rules allowed BF AR applicants to submit additional evidence to support their application where the original refusal was for reasons of deception, false representations, or a previous breach of immigration laws.¹⁴⁴
- 12.41** Unlike the ARU, the BF AR Hub did not use the Home Office Platform for Storage (HOPS) to store supporting evidence. Inspectors asked the Home Office to provide details of how this evidence was stored and were told: “The BF AR Hub store applications and all associated documents electronically within a shared mailbox that only those within the team have access to.” The BF AR Hub told inspectors that they did not have access to HOPS.
- 12.42** Application data and associated documents were retained in accordance with the Home Office’s Knowledge & Information Management Unit’s (KIMU) advice and policy. The default retention period for BF AR Hub information was 25 years. There was, however, some confusion about retention periods, as one manager in the Hub told inspectors that evidence was retained for seven years.
- 12.43** During the onsite phase of the inspection, the BF AR Hub justified the use of an inbox because of the private nature of some of the evidence submitted. One manager told inspectors: “I would not be happy with that being on Atlas where thousands of people could see it.”
- 12.44** However, inspectors were concerned that supporting evidence, including personal data and special category data, was being retained in an inbox for up to 25 years. This created a risk for the Home Office due to the lack of access control (any member of the BF AR Hub could access information by ‘clicking into’ any folder), lack of an audit trail of who had accessed information and when, and the potential for information to be lost, deleted or forwarded in error. Meanwhile, the evidence supporting applications was not accessible to anyone outside of the BF AR Hub who might have a legitimate need to see it. Inspectors were initially unable to assess BF AR applications, until BF AR Hub staff uploaded the evidence to Atlas.
- 12.45** The structure of the inbox also gave cause for concern. It was organised into folders by year, month, caseworker name, and Atlas reference number. Retrieval of information was therefore less than straightforward.
- 12.46** KIMU told inspectors that inboxes should not be used as corporate repositories to store applicant data, and this information should be held on secure platforms such as Atlas or HOPS. The approach to data storage taken by the BF AR Hub was therefore not compliant with KIMU policy and guidance.

144 Immigration Rules, Appendix Administrative Review, AR 3.3.

12.47 Senior managers responsible for BF AR Hub operations were not aware that information was being stored in this way. One manager told inspectors that this raised concerns because “It is not a secure platform and raises data protection issues.”

12.48 In late July 2025, the Home Office told inspectors that the Hub and their senior managers had commenced research to identify the most appropriate data storage solution.

Quality assurance processes

12.49 When this inspection began (in April 2025) the BF AR Hub had no formal quality assurance framework in place. The BF AR Hub told inspectors that there was a policy requirement that all overturned decisions (decisions in favour of the applicant, where the refusal decision was withdrawn) should be signed off by a BFSO, but they did not know what assurance standards the BFSO applied. However, BF AR Hub senior managers told inspectors that there was no such requirement in policy or casework guidance.

12.50 All other decisions made by the BF AR team were subject to a ‘second pair of eyes’ (SPoE) check by one of the other BFHOs. Inspectors were told that this was not a formal assurance process and involved checking “typos, wrong paragraphs and basic errors”. When asked what standards were applied, inspectors were told “common sense”. SPoE checks were not recorded on the BF AR Hub’s local spreadsheet. See Figure 44 for details of the assurance checks undertaken by the Hub.

Figure 44: BF AR Hub assurance checks, 2021 to 21 June 2025

| | 2021 | | 2022 | | 2023 | | 2024 | | 2025 | |
|--|-----------|-------|------------|-------|------------|-------|------------|-------|-----------|-------|
| Number of applications overturned¹⁴⁵ | 9 | | 48 | | 55 | | 27 | | 6 | |
| BFSO assured | 53 | 60.9% | 205 | 75.1% | 285 | 63.9% | 162 | 65.9% | 41 | 43.3% |
| Not assured | 31 | 35.6% | 55 | 20.1% | 87 | 19.5% | 58 | 23.6% | 24 | 25.6% |
| Not recorded | 2 | 2.3% | 10 | 3.7% | 46 | 10.3% | 15 | 6.1% | 8 | 6.7% |
| BFHO assured¹⁴⁶ | 1 | 1.1% | 3 | 1.1% | 23 | 5.2% | 11 | 4.5% | 17 | 14.4% |
| Assured by team | - | - | - | - | 5 | 1.1% | - | - | 9 | 10.0% |
| Total | 87 | | 273 | | 446 | | 246 | | 90 | |

12.51 The Home Office told inspectors that AR decision notices for rejected or withdrawn AR applications were not subject to any assurance or SPoE process. One manager told inspectors that no assurance of these applications was necessary, “as they are very minor and have no complexity.”

12.52 Inspectors found two examples in 11 ARs that they examined where decision notices for rejected or withdrawn applications contained fundamental errors. Case study 5 describes one of these.

145 The BF AR Hub contended that all overturned decisions must be subject to review by a BFSO.

146 Assurance checks recorded by BFHOs were made when deputising to BFSO.

Case study 5: Failure of second pair of eyes (SPoE) check process

The applicant held a Skilled Worker visa to work in health and social care, which was cancelled by Border Force (BF) based on an alleged change of circumstance (specifically, that they had incurred a debt to take employment in the UK and had missed the start date of their employment). BF officers had concerns that the applicant was a victim of modern slavery, but the applicant did not want to be referred to the National Referral Mechanism. They were detained as their AR rights were a barrier to removal, but BF decided to release them from detention the following day.

The applicant submitted an AR application the day after their entry refusal, contending that a caseworking error had been made. The application referred to additional supporting evidence, but inspectors were unable to find this on Home Office systems.

The day after the AR was submitted, BF at the port of arrival overturned the original decision and re-instated entry clearance, granting the person permission to enter.

The AR application was recorded on the BF AR Hub's local spreadsheet as 'withdrawn', but inspectors found no evidence on Atlas or the BF AR Hub spreadsheet that the applicant signed an IS301 AR waiver form. Inspectors were advised by the Home Office that the applicant had submitted an email expressing their desire to withdraw the AR application, but this was not recorded on Atlas or the spreadsheet.

Two days after the AR was submitted, the BF AR Hub served the applicant with an AR decision notice, advising that their AR application had been rejected.

Despite the passenger having a lawful basis to remain in the UK, following the grant of permission to enter by the port, the AR decision notice stated:

"Your administrative review application has been rejected. This means that you must now leave the United Kingdom.

What this means for you.

You have no lawful basis to stay in the United Kingdom. You will now be removed from the United Kingdom".

Inspectors noted that the subsequent pages of the decision notice stated that the port had withdrawn the refusal and granted leave to enter.

There was no evidence of any assurance or SPoE checks of the BF AR Hub decision, and the assurance column on its local internal spreadsheet read 'n/a'.

ICIBI comment

The applicant had leave to enter the UK, but the first page of the decision notice informed them that they must leave the UK as they had no lawful basis to remain. The BF AR Hub was unaware of this error until it was highlighted by inspectors, 17 months after the notice had been served on the applicant.

Inspectors considered this error to be a serious one, given the potential adverse impact on the applicant. It highlighted both the weakness of the quality assurance regime and of poor record keeping.

Home Office response

Border Force AR Hub has no format for being able to refund application fees for decisions submitted for review which are subsequently granted entry by ports prior to the review being concluded. As such, to ensure that the fee is refunded to the passenger it must be treated by us as being a non-valid application (no decision to now be reviewed) and rejected as such.

No IS301 was signed, however an email was received from the applicant advising they wished to withdraw their AR application.

The AR hub hold in our email subfolder for this case the application, notification from port that they had overturned their own decision and the email from the applicant advising they wished to withdraw their AR application.

The decision notice is a template document with this being one of the sections which is generic. As this is generic, there is no free text within. In this case it is accepted that it would have been advantageous to override the form and amend as appropriate due to the passenger having been granted leave to enter the UK. The Home Office is unable to say whether the applicant left the UK as directed by the decision notice.

Recording assurance checks

- 12.53** During the onsite phase of the inspection, the only record of assurance checks available for examination were entries made on the BF AR Hub's local spreadsheet to record whether assurance had taken place. Inspectors were told that no central records of the findings from assurance checks were made. When inspectors queried why this was the case, a hub manager told inspectors "OAD went through our spreadsheet and didn't say we needed to record assurance details."
- 12.54** The Home Office provided inspectors with evidence of assurance activity in relation to ARs recorded on the Border Force Assurance Toolkit.¹⁴⁷ This activity required checks to confirm:
- that ARs were dealt with independently by the BF AR Hub
 - that decisions were made within the 28-day service standard
 - that refunds were referred to UK Visas and Immigration for processing in line with guidance, policy and legislation
 - measures were in place to ensure AR waivers were explained correctly, and passengers fully understand the decision they are making
- 12.55** In relation to the first three bullet points above, the assurance records showed that only five of 35 ports in scope submitted a return indicating that assurance activity had been undertaken.¹⁴⁸ The five returns rated current measures as 'adequate' and 'effective'.
- 12.56** In relation to point four, ten of the 43 ports submitted records indicating assurance activity had taken place. Two of the ports submitted assurance records indicating 'significant' or 'fundamental' weaknesses. The other eight ports submitted assurance records indicating that measures were 'adequate' and 'effective'.

¹⁴⁷ The Border Force Assurance Toolkit is a digital system used by Border Force managers to record and analyse assurance checks.

¹⁴⁸ It was unclear from the data provided how ports were able to assure the first three bullet points as these appear to relate to BF AR actions.

Second-line assurance activity

- 12.57** The Home Office provided two second-line assurance reports, undertaken by OAD in January 2021 and October 2022. Referring to the 2022 report, a manager in the BF AR Hub told inspectors: “I actually requested that inspection because no one had come near us to make sure we were doing things right.”
- 12.58** Inspectors reviewed the October 2022 report. It contained eight recommendations:
- Home Office guidance should be updated to reflect that decisions to cancel leave under s5 of Part 9 of the Immigration Rules attract a right of AR, in accordance with advice from Home Office Legal Advisors
 - ports should be reminded to send IS301 AR waiver forms to the BF AR Hub, and the hub should explore digital options to identify when a waiver has been signed
 - the BF AR Hub should maintain records to show specific reasons for any applications not resolved inside the service standard
 - the BF AR Hub should establish a formal feedback mechanism to inform ports of AR outcomes
 - the BF AR Hub should ensure that port Single Points of Contact understand their role, and a bi-monthly update on hub activity should be sent to all relevant staff
 - the BF AR Hub should review data captured on its local spreadsheet with a view to reducing the amount of biographical information held
 - structures should be reviewed, with a view to ensuring that the BF AR Hub is part of a national team, with reporting lines to Appeals, Litigation and Administrative Review
 - the BF AR Hub should re-establish regular AR forums with frontline staff
- 12.59** In July 2025, the Home Office provided inspectors with an update which confirmed that all of the above issues had been resolved to the satisfaction of OAD, and the recommendations were closed.

Introduction of BF AR Hub Assurance Strategy

- 12.60** On 7 July 2025, during the emerging findings session for this inspection, a BF senior manager advised inspectors that a new assurance strategy had been introduced in the BF AR Hub with effect from 20 June 2025.
- 12.61** A copy of the new strategy was provided to inspectors. This introduced a requirement for BFSO routine sampling of 10% of all BF AR Hub decisions, 100% assurance checks of AR decisions overturning the original decision, and 10% assurance checks of all AR decisions maintaining the original decision. The new strategy was intended to support consistent assurance standards and required all assurance activity to be recorded in a folder on the BF AR Hub SharePoint site.
- 12.62** Given the timing of its introduction, inspectors were unable to assess the effectiveness of this new strategy. However, it appeared to be a considerable improvement on the BF AR Hub’s assurance regime that was in place when inspectors were on site. If correctly followed the strategy should provide more clarity on the required standards as well as robust evidence of the standards being achieved.

Communication and engagement

- 12.63** Inspectors asked the Home Office to provide evidence of routine engagement between the BF AR Hub and internal and external stakeholders.
- 12.64** Within the Home Office, the BF AR Hub attended casework forums for BF Heathrow, BF North, and NICOT. The aim of the forums was to improve the overall standards of frontline immigration casework. BF AR Hub staff also attended the Immigration Border Steering Group, which focused on upcoming changes that were likely to affect frontline operations.
- 12.65** Minutes from these forums indicated that only a small portion of the meetings was dedicated to ARs. Notwithstanding this, inspectors found positive evidence in the minutes of BF AR Hub staff engaging proactively with frontline casework staff. They provided feedback on the number and types of ARs submitted and the ports generating the bulk of AR work, as well as any trends or patterns in caseworking errors.
- 12.66** The Home Office did not provide any evidence of engagement with external stakeholders.

Port engagement visits

- 12.67** BF AR Hub staff expressed concerns to inspectors that the number of AR decisions received by the Hub had declined markedly since 2024 when BF Heathrow had run a voluntary exit scheme for staff. Team members also expressed concern that some ports and regions generated fewer ARs than they would expect. One team member told inspectors “It’s concerning that the ports have the attitude that they do. A view exists that if someone has a visa, they have Entry Clearance and the work is done, so you just let them through.”
- 12.68** To address these concerns and improve awareness of the work of the BF AR Hub, and of AR rights and ethical caseworking, Hub staff had made a number of visits to ports to speak to frontline staff. See Figure 45.

Figure 45: Port visits made by the BF AR Hub

| Port | Border Force region | Date of visit |
|--------------------------------|---------------------|---------------|
| Glasgow Airport ¹⁴⁹ | North | May 2023 |
| Edinburgh Airport | North | November 2023 |
| Edinburgh Airport | North | December 2023 |
| Edinburgh Airport | North | January 2024 |
| Heathrow Casework Hub | Heathrow | June 2024 |
| Aberdeen | North | November 2024 |
| Belfast | North | November 2024 |
| Brussels | Europe | January 2025 |
| Paris | Europe | January 2025 |

- 12.69** Inspectors noted that no visits had been made to Border Force Central Region, where the number of AR applications appeared disproportionately small (35 AR applications between

¹⁴⁹ While listed as a ‘visit’ in evidence provided by the Home Office, the BF AR Hub is based in a BF office at Glasgow Airport.

2021 and June 2025). Nor had there been any visits to Border Force South (103 AR applications between 2021 and 2025).

NICOT newsletter

- 12.70** From June 2023, the BF AR Hub contributed articles to the quarterly NICOT newsletter. The articles contained statistical summaries, and patterns and trends identified in recent AR applications. They also highlighted areas of poor practice by ports, for example, the inappropriate use of curtailment, and the use of incorrect paragraphs of the Immigration Rules to cancel leave.
- 12.71** Inspectors reviewed a sample of the newsletters and noted that several of the articles drafted by the BF AR Hub contained grammatical errors, suggesting they had not been carefully proofread. However, the more substantive concern was that BF AR Hub staff were providing operational guidance on how certain cohorts of applicants should be processed at the border, which was not within the Hub's remit.
- 12.72** As an indicator of the effectiveness of the NICOT newsletters in encouraging internal engagement, inspectors asked the Home Office for the number of emails sent to the BF AR Hub in response to newsletter articles. Between August 2024 and June 2025, BF AR Hub had received 14 emails on a range of subjects, including requests for port visits, AR rights in criminal cases, and technical queries on different cohorts of AR applicants.¹⁵⁰

Feedback to frontline BF Officers

- 12.73** According to written evidence provided by the Home Office, the BF AR Hub provided "extensive feedback" in all cases where port decisions were overturned. Feedback was included in a form IS10 and uploaded to Atlas.¹⁵¹ However, inspectors were unable to find any IS10 providing feedback to the port of entry on Atlas for the one overturned application in the sample of 11 ARs that they examined.
- 12.74** In response to file sampling queries, the Home Office told inspectors that, where errors were found in maintained applications, feedback was provided to ports of entry via email. During onsite interviews, BF AR Hub staff told inspectors that they provided feedback to a named Single Point of Contact at each port. This feedback was both positive, where IS82s were well drafted, and negative, where errors in decision making were identified.
- 12.75** Within the file sample, inspectors found there were instances of caseworking errors identified in rejected applications that were not fed back to the port of entry. In one case, BF at the port of entry had incorrectly afforded the applicant a right of AR. The AR decision notice advised the applicant: "The decision that you have applied to have reviewed is not eligible for administrative review". However, the BF AR Hub did not notify the port of the error. The Home Office told inspectors: "No feedback was given to the port in respect of this case at the time due to the AR being rejected. Cases that do not pass validation are not reviewed by the AR team."

¹⁵⁰ In its factual accuracy response, the Home Office highlighted that 26 emails were provided to inspectors: 14 of those emails were attributed to the BF AR Hub inbox and 12 emails to the NICOT inbox.

¹⁵¹ An IS10 is a form used by Border Force officers to record minutes as a summary of actions taken during immigration casework.

Working relationships and future of the BF AR Hub

- 12.76** Inspectors found a lack of engagement between Hub staff and senior managers responsible for oversight of BF ARs. Staff working in the Hub felt that senior managers did not fully understand the work they did or immigration casework in general.
- 12.77** Senior managers told inspectors they were concerned about the Hub's declining workload, and a lack of engagement with staff. At the time of the inspection, they were considering several options for the future of the BF AR Hub. These included maintaining the status quo, retaining the current AR Hub staff but giving them additional responsibilities, or devolving consideration of ARs to regional casework hubs.

Annex A: Administrative Review Unit customer insight survey questions

- How would you rate the service provided to you by the Admin Review Unit overall? Answer on a scale of 1- 10, where 1 means “poor” and 10 means “excellent”
- Was the guidance on how to submit Admin Review [sic] application clear and helpful on GOV.UK?
- Did you find the Admin Review application submission easy to use/navigate?
- Was there a delay in receiving your decision?
- How long was the wait for your decision to your application?
- Did you receive any updates regarding a delay to your application?
- Did you make contact with the Admin Review Unit whilst awaiting your decision?
- How long did it take to get a response with the information required?
- Did you receive your decision to the address/email on your application?
- Did your decision letter contain all information to outline the reason for the decision?
- Did you make any further contact with the Admin Review Unit once you received your decision?
- Did you receive a response in a timely manner?

Annex B: Border Force administrative review waiver and explanation form

Date:

Reference:

Name of passenger:

Name of others present:

Language of interview:

Name of interpreter:

Officer:

Time of interview:

Q) Do you understand me/the interpreter? ___Yes/No___

Q) Are you fit, well and happy to continue? ___Yes/No___

Explanation to be read to the passenger

You have been refused entry to the UK. You are entitled to apply for an Administrative review of this decision. What this means is that you can apply for your refusal decision to be reviewed by an independent Border Force Higher Officer based at another location. If you are detained you will have **7 days** to make an application, if you are granted bail you will have **14 days**. You can only apply from within the UK. If you are refused at one of our Juxtaposed ports, you will have **28 days** to lodge your application from abroad. Applications are made online and there may be a fee. Details on how to apply can be found on your refusal document. Once your application is received at the Administrative Review Hub in Glasgow, a decision will be made within 28 days. If within the 28 day period you;

- request your document back and leave the UK
- withdrawn [sic] your application
- make an application for entry clearance, leave to enter, or leave to remain

your application will be deemed as withdrawn in accordance with paragraph 34X of the Immigration Rules.

Q) Do you understand?

Q) Do you intend to make an application for an Administrative Review of the decision to refuse you entry to the UK? You do not need to make this decision today.

If the passenger states they do not intend to apply for an Administrative Review, complete the following section.

Administrative review wavier [sic] section:

Please read to the passenger

By signing and dating this form you are agreeing to waive your right to AR. Once completed you will not be able to lodge an AR. You must sign and date the form to enable the waiver to be valid. The waiver will take place on the date you sign it.

Q) Do you understand? ___ Yes/No ___

Please print, sign and date

*A parent or legal guardian may sign if you are under 18 years of age.

If you are sending this by post or email, please send it to;

[email address redacted]

Admin Review Casework Hub
Border Force
Glasgow International Airport
PA3 2TD

Annex C: Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on their behalf. The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions and in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum Act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on paragraph 17 of Schedule 3 to the Equality Act 2010 (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to them in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which they have committed to do within eight weeks of receipt, subject to both Houses of Parliament being in session.

Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

Annex D: ICIBI ‘expectations’

Background and explanatory documents are easy to understand and use (e.g. statements of intent (both ministerial and managerial), impact assessments, legislation, policies, guidance, instructions, strategies, business plans, intranet and GOV.UK pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

Decisions and actions are ‘right first time’

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

Errors are identified, acknowledged and promptly ‘put right’

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from Administrative Review and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

Each immigration, asylum, nationality or customs function has a Home Office ‘owner’

The Home Office ‘owner’ is accountable for:

- implementation of relevant policies and processes
- performance (informed by routine collection and analysis of management information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
- resourcing (including workforce planning and capability development, including knowledge and information management)
- managing risks (including maintaining a risk register)
- communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
- effective monitoring and management of relevant contracted out services
- stakeholder engagement (including customers, applicants, claimants and their representatives)

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