



An inspection of overstayers

March to October 2025

John Tuckett

Independent Chief Inspector of
Borders and Immigration

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March to October 2025

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Contents

Foreword	2
1. Background	6
2. Scope and methodology	16
3. Key findings	20
4. Recommendations	43
5. Inspection findings: Governance	48
6. Inspection findings: Prevention – visa decision making	58
7. Inspection findings: Home Office engagement with sponsors and institutions	123
8. Inspection findings: Home Office engagement with migrants	136
9. Inspection findings: Data and systems	153
10. Inspection findings: Identification of overstayers by the Home Office and external stakeholders	193
Annex A: ICIBI letter to the Second Permanent Secretary, 3 July 2025	216
Annex B: Role and remit of the Independent Chief Inspector	220
Annex C: ICIBI expectations	223
Acknowledgements	227

Foreword

According to the Immigration Rules, an overstayer is a “person who has stayed in the UK beyond the latest of: the time limit attached to the last permission granted; or the period that the permission was extended under section 3C or 3D of the Immigration Act 1971”. The Home Office does not have a figure for the number of overstayers currently in the UK, nor does it have a single policy for tackling overstaying, or a Senior Civil Servant with complete oversight of the department’s response.

This inspection found that, for most practical and operational purposes, the Home Office was not focused on overstaying itself and typically approached it in terms of its relationship to other higher-priority concerns, such as illegal working and asylum claims. Its recording of overstayers was inconsistent, not helped by the large number of systems used to identify and manage overstayers, the limitations of some of those systems, and the difficulty of working across them. Atlas, in particular, was heavily criticised by several Home Office teams.

As in other areas of immigration abuse, the best and most cost-effective way to combat overstaying is to prevent it, in this case by denying visas to applicants seeking to come to the UK who are assessed to pose the greatest risk of overstaying, and by ensuring that those in the UK with limited leave to remain, including non-visa

nationals, know the date by which they must depart and the consequences of not doing so.

It is hard to prove the effectiveness of visa refusals, and easier to see where the granting of visas to certain cohorts has led to problems, for example, individuals who arrived in the UK having been granted Student visas but who subsequently made asylum claims, a concern the government drew attention to in its 'Restoring control over the immigration system' white paper.

Inspectors saw evidence of the Home Office amending policies and risk profiles in response to what it regarded as abuses, but there is an inevitable time-lag in doing so, as well as understandable caution about unlawful discrimination. The Home Office maintains that the Complexity Application Routing Solution (CARS) is not a decision-making tool but is used to route visa applications according to their complexity, which helps the efficient use of resources. Inspectors agreed that CARS contributed to efficiency, but the routing does affect the level of scrutiny an application receives, and while the profiles on which it is based remain secret, it is inevitable that some people will mistrust the use of such a system. While the Home Office needs to guard against enabling visa nationals to circumvent legitimate controls, some greater transparency about its working practices would therefore be helpful.

For those visa holders and non-visa nationals with limited leave who are already in the UK, getting the messaging right about overstaying is important both as a

deterrent and to improve the reporting of overstayers by police and others who may encounter them. This report identifies weaknesses in the current arrangements for visa sponsors to report non-compliance by visa holders, and in the Home Office's follow-up of such reports, that should be fixed, including delays in cancelling leave where sponsorship has been withdrawn. With regard to enforcement action, there is a need for clear internal messaging across the Migration and Borders System about whether overstayers are a priority only where they go on to commit some other immigration offence.

The Home Office's inability to estimate overstayer numbers impacts decisions about investment, resource allocation and operational priorities. Whatever the genuine difficulties, many will see the fact that it has not been in a position to publish Exit Check data since 2020 as a failure to grip matters. Gaps in the data, and errors in recording 3C leave, affect the Home Office's understanding of overstaying and its efficiency and effectiveness in targeting assurance checks at the visa application stage, and compliance and enforcement activities in the UK. Correcting this starts with accurate, consistent and (as far as possible) complete record keeping, which is a matter of setting and reinforcing expectations and standards and fixing systems, in particular Atlas.

This inspection identified a number of 'live' and planned initiatives aimed at improving the Home Office's response to overstaying, but like the current "amalgam" of

measures, they appear fragmented and, given previous unfulfilled promises, there must be some doubt whether they will be followed through. While it is not the solution to everything, having a Senior Civil Servant with overall accountability for overstaying and overstayers would provide much-needed focus to what is a complex set of challenges.

This report contains five recommendations, covering Leadership and Strategy, Record Keeping and Information Management, Communication, Visa Decision Quality Management, and Visa Cancellations. The report was sent to the Home Secretary on 21 October 2025.

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

John Tuckett
Independent Chief Inspector of Borders and
Immigration

1. Background

Definition of an overstayer

1.1 The Immigration Rules (paragraph 6.2), state:

““overstayed” or “overstaying” means the person has stayed in the UK beyond the latest of:

(a) the time limit attached to the last permission granted; or

(b) the period that the permission was extended under section 3C or 3D of the Immigration Act 1971.”¹

Section 3C and section 3D leave

1.2 Section 3C of the Immigration Act 1971 (s.3C leave) prevents a person from becoming an overstayer while they are awaiting the outcome of any appeal or administrative review, or awaiting the decision of an ‘in-time’ application to extend their leave. An application is deemed to be ‘in-time’ if it is submitted to the Home Office while the applicant has leave to enter or remain.

1 Home Office, ‘Immigration Rules: introduction’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-introduction>

1.3 Home Office ‘Leave extended by section 3C (and leave extended by section 3D in transitional cases)’ caseworker guidance states that:

“A person will have section 3C leave if:

- they have limited leave to enter or remain in the UK
- they apply to the Secretary of State for variation of that leave
- the application for variation is made before the leave expires
- the leave expires without the application for variation having been decided
- the application for variation is neither decided nor withdrawn”²

1.4 Following the refusal of an application, s.3C leave continues during the period where an in-time appeal or application for an administrative review could be brought or is pending.

1.5 Paragraph 3D of the Immigration Rules applies where a period of leave has been curtailed or

2 Home Office, ‘3C and 3D leave: caseworker guidance’ (updated 17 August 2023). <https://www.gov.uk/government/publications/3c-and-3d-leave>

revoked and while an appeal against that decision can be brought or is pending.³

Section 39E of the Immigration Rules

- 1.6** Paragraph 39E of the Immigration Rules allows for a period of overstaying to be disregarded by casework decision makers in certain compassionate circumstances. This includes instances where an application is made within 14 days of the applicant's leave expiring and the Secretary of State considers that there is a good reason, beyond the control of the applicant or their representative, why the application could not be submitted in-time.⁴
- 1.7** Home Office caseworker operational practice instructions, which are not published on GOV.UK,

3 Following the changes to appeal rights in the Immigration Act 2014, decisions to curtail or revoke leave no longer give rise to a right of appeal. Section 3D therefore continues to apply only to people whose leave was revoked or curtailed before 6 April 2015 and who have appeals pending against the decision to revoke or curtail their leave (under the pre-6 April 2015 appeals system).

4 Home Office, 'Immigration Rules part 1: leave to enter or stay in the UK' (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-part-1-leave-to-enter-or-stay-in-the-uk>

state that in-country applicants are not penalised solely for an overstay of up to 28 days. Each application must be assessed on its own merits considering the applicant's overall immigration history and circumstances. However, if the in-country application is refused, the applicant is an overstayer from the time that their last leave expired.

Notice of Liability to Remove

1.8 Once an individual is confirmed as an overstayer by Immigration Enforcement, and action is taken to progress their case, they are served with a Notice of Liability to Remove (NOL). Notices set out the date of issue and duration of the previous leave, the requirement of the subject to depart the UK, and contact details for the Voluntary Returns Service.⁵

⁵ The Voluntary Returns Service is for eligible migrants who wish to return home. The Voluntary Returns Service can be used to explain the options for returning home, help to obtain travel documents, and pay for travel tickets in certain circumstances. Migrants may also be eligible for financial support of up to £3,000. GOV.UK, 'Get help to return home if you're a migrant in the UK'. <https://www.gov.uk/return-home-voluntarily>

Re-entry bans

- 1.9** Where a person is identified as an overstayer and subsequently leaves the UK voluntarily or is removed by the Home Office, they may be subject to a mandatory re-entry ban, which is calculated from the date the person left the UK. Individuals can be given a re-entry ban if they have previously breached UK immigration laws, which includes overstaying, but also in other circumstances, such as if they have entered the UK illegally, or used deception in an application.
- 1.10** The duration of a re-entry ban is determined by the circumstances surrounding the individual's departure from the UK, the date of departure, and the extent of any period of overstaying. See Figure 1.

Figure 1: Re-entry bans periods⁶

Length of ban	Ban applies where the applicant	Applicant left the UK	And the applicant left the UK
1 year	left voluntarily	at their own expense (having overstayed more than 90 days if before 6 April 2017 or more than 30 days if after 6 April 2017)	N/A
2 years	left voluntarily	at public expense	within six months of being given an NOL or when they no longer had a pending appeal or administrative review, whichever is later.

6 Home Office, ‘Suitability: previous breach of UK immigration laws’ (updated 15 November 2023). <https://www.gov.uk/government/publications/suitability-previous-breach-of-uk-immigration-laws-immigration-staff-guidance>

Length of ban	Ban applies where the applicant	Applicant left the UK	And the applicant left the UK
5 years	left voluntarily	at public expense	more than six months after being given NOL or when they no longer had a pending appeal or administrative review, whichever is later.
5 years	was deported or removed from the UK	as a condition of a caution issued in accordance with section 22 of the Criminal Justice Act 2003 (and providing that any condition prohibiting their return to the UK has itself expired)	N/A
10 years	was deported or removed from the UK	at public expense	N/A

Length of ban	Ban applies where the applicant	Applicant left the UK	And the applicant left the UK
10 years	used deception in an application (for visits this applies to applications for entry clearance only)	N/A	N/A

1.11 Inspectors were told by Home Office policy staff that visa nationals would find it difficult to return to the UK via a legitimate route during the re-entry ban period. However, although non-visa nationals subject to a re-entry ban should be identified at the UK border as having previously overstayed, it is more difficult to prevent them from travelling to the UK.

Legislation

1.12 Overstaying is an offence under section 24 C1 of the Immigration Act 1971, as amended by the Nationality and Borders Act 2022 (NABA), which states that overstaying refers to:

“A person who—

- (a) has only a limited leave to enter or remain in the United Kingdom, and

(b) knowingly remains beyond the time limited by the leave, commits an offence.”⁷

- 1.13** The NABA introduced a maximum penalty for overstaying of four years imprisonment or a fine (or both). However, prosecution is sought only where there are “aggravating” factors that mean that it is in the public interest. For example, repeated disregard for lawful restrictions, where it can be shown that the individual had full knowledge of their status, could be treated more seriously. Convicted overstayers who are sentenced to 12 months or more are liable to automatic deportation under section 32 of the UK Borders Act 2007.⁸
- 1.14** Between 1 March 2024 and 28 February 2025, four individuals were prosecuted for overstaying. The four received custodial sentences ranging from eight to 16 months. However, additional aggravating factors were present, including identity document offences in three cases, and illegal employment in one case.

Overstayer population

- 1.15** The Home Office does not publish data on overstayers, as it is not currently able to generate

7 Immigration Act 1971. <https://www.legislation.gov.uk/ukpga/1971/77>

8 UK Borders Act 2007. <https://www.legislation.gov.uk/ukpga/2007/30/section/32/2024-11-07>

reliable estimates of this population. However, it does publish a range of data on asylum seekers and immigration offenders, which may include those who have overstayed their leave to enter or remain.⁹

- 1.16** Overstayers typically come to the Home Office's attention through police interventions, immigration enforcement operations, or when an application is submitted to the Home Office. For example, a visitor who has overstayed their six-month visa may later apply to remain in the UK as the spouse of a British Citizen.

9 Home Office, 'Immigration system statistics data tables' (updated 21 August 2025). <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables>

2. Scope and methodology

2.1 This inspection examined the efficiency and effectiveness of the Home Office's approach to:

- preventing overstaying, including:
 - the identification of previous and potential overstayers in visit, temporary worker, and short-term student visa routes
 - compliance, assurance, and engagement with sponsors and short-term education institutions
 - feedback loops within the Home Office
- detecting overstayers, including:
 - the intelligence, processes, and resources used

2.2 Inspectors:

- conducted research using open-source material, including published reports, published Home Office guidance, and internal instructions such as Operational Instructions and Standard Operating Procedures
- on 24 April 2025, formally notified the Home Office of the intention to inspect the Home Office's approach to overstayers

- between 3 and 4 April 2025, undertook familiarisation visits in Sheffield to speak with staff from Visa, Status and Information Services, and Immigration Enforcement
- on 26 March 2025, published a 'call for evidence' on the ICIBI website, seeking evidence from anyone with knowledge or first-hand experience of this subject
- analysed 14 submissions to the 'call for evidence' from a range of stakeholders, including non-governmental organisations, local authorities, charities, legal representatives, and members of the public
- between April and June 2025, undertook familiarisation calls with three stakeholders

- sampled records of 100 granted visa applications where the applicant was subsequently served (between March 2024 and February 2025) a Notice of Liability to Remove letter for overstaying¹⁰
- requested documentary evidence and data from the Home Office and analysed the 490 documents provided
- between 9 and 27 June 2025, conducted 51 in-person and remote interviews and focus groups with 81 members of Home Office staff from grades Administrative Officer to Senior Civil Servant (Grade 5), and conducted one interview with a sponsor on the Seasonal Worker visa route.

10 The Home Office provided a list of 19,235 cases of visa nationals who were served a NOL for overstaying between 1 March 2024 and 28 February 2025. Inspectors stratified the list, so that the cases examined were Visit visas, Short-term Student visas, and Temporary Worker visas issued since 1 January 2023. Cases were stratified further to ensure the percentage of examined visa types reflected the percentage of overstayers for that route. The filtered cases were then numbered, and inspectors used a random number generator to select the 100 cases.

- on 11 and 24 July 2025, presented the inspection's emerging findings to the responsible Home Office Senior Civil Servants

2.3 This report was sent to the Home Office on 22 September 2025 for factual accuracy checking prior to submission to the Home Secretary for laying before Parliament.

3. Key findings

Governance

- 3.1** The Home Office does not have a single policy or strategy for tackling overstaying. Instead, it referred inspectors to an amalgam of measures: the “anxious scrutiny” of visa and renewal applications; a “suite of policies and powers” designed to make it difficult to remain in the UK as an overstayer; a “clear legal framework of powers to remove overstayers”; and “targeted enforcement activity to identify and remove” them, which the government had indicated it planned to strengthen in its white paper ‘Restoring control over the immigration system’, published in May 2025.¹¹
- 3.2** These measures fall to different Home Office directorates and teams to deliver, principally within Visa, Status and Information Services (VSI) and Immigration Enforcement (IE), but also involving Home Office Intelligence (HOI), policy staff from Migration and Borders Group, and others. There is no overall Senior Civil Servant owner or oversight. Consequently, efforts to prevent overstaying, and to detect and remove overstayers, are fragmented

11 Home Office, ‘Restoring control over the immigration system: white paper’ (published 12 May 2025). <https://www.gov.uk/government/publications/restoring-control-over-the-immigration-system-white-paper>

and there are gaps in both understanding overstaying and in the Home Office's response.

- 3.3** The definition of 'overstayed' or 'overstaying' contained within the Immigration Rules is unambiguous.¹² It means a person has stayed in the UK beyond the latest of: the time limit attached to the last permission granted; or the period that the permission was extended under section 3C or 3D of the Immigration Act 1971. The 1971 Act, and Nationality and Borders Act 2022, are equally clear that a person who has only limited leave to enter or remain in the UK and knowingly remains beyond the time limited by the leave, commits an offence.¹³
- 3.4** However, the ICIBI found that, for most practical and operational purposes, the Home Office was not focused on overstaying as such and typically approached it in terms of its relationship to other, higher-priority concerns, such as illegal working and asylum claims. These issues are

12 Home Office, 'Immigration Rules: introduction' (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-introduction>

13 Immigration Act 1971. <https://www.legislation.gov.uk/ukpga/1971/77>;

Nationality and Borders Act 2022. <https://www.legislation.gov.uk/ukpga/2022/36/section/40>

undoubtedly intertwined, but this approach created difficulties. For example, it meant that some staff were uncertain about whether a person who had overstayed and were then found to be working illegally should be recorded as both, or whether ‘overstayer’ should be applied only to those who had not committed another immigration offence or had not claimed asylum after their visa had expired.

3.5 VSI directors attend the Customer Services Group (CSG) Board. Inspectors were informed that the CSG Board’s risk register included a risk related to overstayers under the heading of ‘abuse of legal routes’. However, there are not any risks specifically concerning overstayers recorded on any centrally held risk register maintained by VSI, IE or HOI.¹⁴

3.6 During the course of the inspection, the Home Office revised its operational priorities, increasing the priority it attached to overstaying, in light of a perceived increase in the impact of overstayers on UK communities. At the time of writing, it was too soon to identify any concrete effects of this re-prioritisation, but based on ICIBI’s other

14 In its factual accuracy response, the Home Office stated, “[risks] are incorporated within several IE Strategic Risks and addressed through the IE Control Strategy.”

findings it is unlikely to make an appreciable difference without first fixing a number of record-keeping, data and other issues affecting the Home Office's understanding of the nature and scale of overstaying. Even then, other threats, like illegal working, remain a higher priority for enforcement action, while overstaying does not have a designated 'threat lead' to drive the operational response.

Visa decision making

- 3.7** Removing overstayers from the UK is difficult, time-consuming, and costly. This puts a premium on prevention. In the case of visa nationals, this means refusing visa applications where there are grounds for believing that the applicant will not comply with the terms of a visa, including not leaving the UK when the visa expires.
- 3.8** Visa applications are subject to certain mandatory checks and must conform to the eligibility and suitability requirements of the particular visa route. The Immigration Rules do not explicitly address the risk of overstaying, but many short-term (up to 12 months) visa categories, including Visit visas, Temporary Work visas, and Short-term Student (STS) visas, require applicants to demonstrate the clear intention to depart the UK before their visa expires and, in some cases, to satisfy 'genuineness' criteria.

- 3.9** Inspectors found that visa decision makers (DMs) did not focus solely on the risk of overstaying but considered it alongside the applicant's immigration history and personal circumstances to form a view of their overall credibility. Where a DM required further information or explanation to assess an application, they could request additional checks or interviews of applicants and/or their UK sponsors to be carried out. These 'enrichment' actions might include requesting document verification checks from overseas sources to corroborate information provided on a visa application form. However, such requests often produced no response, especially from certain countries with high visa application volumes.
- 3.10** While interviews are an option for Work visa applicants, between 1 January 2024 and 30 June 2025 only two Seasonal Worker visa applicants were interviewed. Meanwhile, interviews are not used at all for STS visa applicants. The Home Office reported that there would be no benefit in interviewing applicants for either route. In the case of seasonal workers, the government has set an annual quota of 45,000 for 2025. However, there are no 'genuineness' criteria for this route, so DMs were unable to refuse an application on credibility grounds, even if the individual had previously overstayed, unless a re-entry ban was in place. Seasonal Worker visa applications made up just under half (44.3%) of the 87,837 Temporary

Worker visa applications received in the year ending June 2025. In the same period, only 7,391 (8.35%) of Temporary Worker visa decisions were refusals.¹⁵

- 3.11** The absence of ‘genuineness’ criteria was recognised as a weakness in the case of STS applicants. VSI managers identified a large influx of STS applications and increased abuse of the route between July 2024 and December 2024. Working with policy and guidance colleagues, in April 2025 the Immigration Rules were amended and ‘genuineness’ criteria were introduced for STS applicants. This simplified the refusal process for cases where potential non-compliance, such as overstaying, is suspected. In the year ending June 2025, the Home Office refused 9,593 (68.01%) STS visa applications. This compared to 3,204 refusals in the preceding year, albeit against a much smaller number of applications (7,301).
- 3.12** By far the highest number of applications are for Visit visas. In the year ending June 2025, more than 2.75 million Visit visa applications were

¹⁵ Home Office, Immigration System Data Statistics, ‘Entry clearance visa applications and outcomes detailed data sets, year ending June 2025’ (published 21 August 2025). <https://www.gov.uk/government/statistical-data-sets/migration-transparency-data#uk-visas-and-immigration>

submitted. During the same period, 2.78 million Visit visa outcomes were recorded, of which 553,632 (19.9%) were refused.

3.13 The Home Office sifts applications for some types of visas into separate ‘non-complex’ and ‘complex’ workstreams using the Complexity Application Routing Solution (CARS). Between 1 January 2024 and 30 June 2025, 896,185 (21.2%) Visit visa applications were routed as complex. The Home Office told inspectors that CARS helped it to make the most efficient use of its resources. CARS may also suggest a particular enrichment activity, such as document verification. DMs and their managers agreed that CARS was useful for filtering applications but insisted that each visa application was considered individually on its own merits.

3.14 CARS looks at person-centric attributes and runs this against a set of risk profiles developed by VSI’s Central Risk team. The risk profiles are based on two main datasets: asylum claims linked to previously issued visas; and refusals under the Immigration Rules part 9.7.1 (making false representations, submitting false documents, and failure to disclose relevant facts).¹⁶ The profiles

16 Home Office, ‘Immigration Rules part 9: grounds for refusal’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-part-9-grounds-for-refusal>

do not include data on overstaying, given existing limitations with Initial Status Analysis (ISA) data. VSI is not currently able to use this information to its full potential and may not rely on ISA data to inform the thresholds for nationalities for inclusion in ministerial authorisations or in risk profiles. As well as Visit visas, CARS is used on some Student routes (not including STS), Marriage and Family, and Family Reunion routes. A ministerial authorisation for Skilled Worker visas was signed by the minister on 2 July 2025. At the time of writing, the Work service line was considering the use of CARS when applying this authorisation.

3.15 DMs have daily benchmarks for the number of decisions they must make. The number varies considerably according to the assessed level of risk associated with each visa route, and whether applications are non-complex or complex. DMs said they found the benchmarks challenging, some particularly so, and referred to the difficulty of balancing quantity and decision quality. While enrichment checks or interviews are not mandatory or necessary for many applications, to reach some benchmarks meant deciding some applications without requesting ‘enrichment’ checks or interviews that might have provided relevant information and produced a better understanding of the applicant’s likely ‘genuineness’. Inspectors were not made aware of any attempts to assess what impact, if any, this

was having on rates of overstaying or other forms of immigration abuse.

3.16 DMs were positive about the training and mentoring they had received and confirmed they had access to detailed casework guidance through the Migration and Borders Guidance platform. They also received regular updates on trends, harms and risks, through briefings, meetings, ‘newsflashes’, and ‘signposts’ from a variety of internal risk and harm teams and the Casework Intelligence team. Some staff questioned whether the onshoring to the UK of most visa decision making meant that the Home Office had lost the benefit of the local knowledge which DMs based overseas developed, though an earlier ICIBI inspection had found it difficult to evidence the true value of such knowledge.¹⁷ Now, DMs had access to country briefings and country profiles and, when dealing with high-risk countries, they also had access to dedicated Microsoft Teams chats and ‘country leads’.

17 Independent Chief Inspector of Borders and Immigration, ‘An inspection of the Home Office’s Network Consolidation Programme and the “onshoring” of visa processing and decision making to the UK’ (published 6 February 2020). <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-network-consolidation-programme-and-the-onshoring-of-visa-processing-and-decision-making-to-the-uk>

3.17 VSI receives weekly returns from the Immigration and Asylum Biometric System, and daily updates of asylum cases on the Central Reference System (CRS) Post Dashboard where claimants have entered the UK with a valid visa. The harm teams review these cases to identify whether any errors were made during the decision-making process and whether there are any learning opportunities. Immigration Enforcement (IE) and Border Force (BF) also share some information with VSI, including data on the relatively small number (300+ in 2023) of visa holders, some of them overstayers, found trying to exit the UK concealed in vehicles. However, there are gaps in feedback and information sharing. For example, when individuals are served with a Notice of Liability to Remove (NOL) by Immigration Enforcement, VSI are not routinely alerted.

3.18 First-line assurance of visa decision making is done by entry clearance managers, mostly Higher Executive Officers. (DMs are either Administrative Officers (AOs) or Executive Officers (EOs), with the latter deployed on complex cases and all STS applications). VSI follows the CSG Quality Assurance Strategy, last updated in August 2024, which allows CSG business areas some flexibility around levels of checking, based on their assessment of risks. Consequently, assurance regimes vary for the different visa service lines, and also according to the experience of individual

DMs.¹⁸ DMs told inspectors that they received constructive feedback from assurance checks.

3.19 Inspectors did not examine the quality scores for the different visa routes. However, from their examination of 100 case records and from stakeholder responses to ICIBI's 'call for evidence', the quality assurance process was not preventing some serious errors in decision making and decision letters. Some managers working in the Visits service line told inspectors that there was a lack of training for EO DMs on writing refusal letters and for HEO entry clearance managers on quality assuring such letters. Managers had tried to address this locally by creating their own training materials.

18 The ICI wrote to the Second Permanent Secretary in July 2025 about quality management across the Migration and Borders System. A copy of the letter is at Annex A. The ICI subsequently met with the Senior Civil Servant lead for quality management in CSG in order to ensure that the concerns were fully understood.

3.20 Inspectors were also told that administrative reviews served as the second layer of assurance.¹⁹ Between 1 January 2024 and 30 June 2025, 4,229 visa refusals were overturned following an administrative review. Of the 391 STS cases included in this total, VSI managers reported that a “very high percentage” had gone on to claim asylum after arriving in the UK. As a result, the Study service line worked with the Administrative Review team to ensure that visa refusal decisions were more robust.

Home Office engagement with sponsors and institutions

3.21 For those visa routes where the applicant requires a UK sponsor,²⁰ efforts to promote and regulate visa compliance focus on the sponsors.

19 Administrative reviews focus on identifying and correcting caseworking errors. In March 2025, ICIBI began an inspection of administrative reviews. The inspection report was in draft at the time of writing. However, the inspection had found large backlogs and delays of months, and in some cases years, in responding to administrative review applications. These diminish any value that administrative reviews might have as a quality assurance tool.

20 Work visas and Student visas, except STS visas, where the provider of the course has to be accredited.

Again, VSI's approach to sponsor engagement is informed by its understanding of the risks associated with each visa route, including the risk of overstaying. However, it also has to recognise the practicalities. For example, the number of Work visa sponsors increased from 32,686 in January 2019 to 118,934 by January 2025, and the Home Office told inspectors it does not have the capacity to run a system of routine compliance visits on this scale.

3.22 The only Work route for which the Home Office has compliance metrics is the Seasonal Worker route, which has just six sponsors with whom the department is able to maintain regular contact and in whose interests it is to be compliant. Where it identifies a non-compliant Work visa sponsor, for example, through an illegal working visit by Immigration Enforcement, the Home Office is able to suspend or revoke the sponsorship licence and can ban an employer from applying for sponsorship status for 12 months. However, rogue employers intent on non-compliance can easily set up a new company under a different name and with different directors to circumvent such a ban. The process for a new licence involves the relevant background checks being undertaken on the named key personnel linked to the licence alongside ensuring that the company is lawfully operating in the UK, registered with Companies

House (if applicable), and has a verifiable trading presence.

- 3.23** The Home Office does not set any compliance or attendance targets for STS accredited providers. However, for other Student visa sponsors, such as universities, sponsors are required to report students who do not comply with the terms of their visa, for example, those who fail to attend their course. Between 1 January 2024 and 30 June 2025, the Home Office revoked 22 Student visa sponsors, mostly for failing to maintain proper records.

Home Office engagement with migrants

- 3.24** The Home Office also makes efforts to encourage immigration compliance by engaging with migrants directly and through diaspora communities. The National Community Engagement Team (NCET) conducts engagement activity with these communities, attending meetings and distributing information leaflets. NCET staff told inspectors that overstayers were their “number one priority”, but inspectors found that there was no qualitative assessment of NCET’s impact.
- 3.25** Home Office senior managers recognised the need to engage more proactively with people whose permission to stay is due to expire or has

expired. Under the Future Border and Immigration System there were plans to communicate digitally with visa holders nearing their visa expiry dates and warn them of the consequences of overstaying. Meanwhile, in written evidence the Home Office stated that it “employs a strategy to publicise the importance of compliance with immigration laws, focusing on creating a compliant environment rather than singling out overstayers.”

- 3.26** The Voluntary Returns Service (VRS) is an important tool in the Home Office’s strategy for removing immigration offenders from the UK. However, the process may inadvertently inflate the number of identified overstayers, as an individual who has lodged an asylum claim must withdraw that claim before receiving assistance through the VRS, at which point they become an overstayer even though they have confirmed their intention to leave the UK. Policy officers described this process as necessary to allow the service of papers, without which the case cannot be progressed.
- 3.27** Stakeholders who provide advice and support to migrants observed that the quality and reach of Home Office communications could be improved by simplifying the available information, including by better signposting of the GOV.UK pages setting out the Immigration Rules, by clearly highlighting expiry dates of permission to stay,

and by improving access to the Home Office for those with queries. One argued that the Home Office was “creating overstaying situations through poor IT, poor application form design, poor administration of rules and poor communication.” However, the prevailing view from Home Office staff was that most overstayers made a conscious decision to do so.

- 3.28** One example of a lack of clarity concerns the date by which a STS student must leave the UK, and whether it is 30 days after the end of their course or at the end of the visa’s 11-month validity. In interviews and focus groups, Home Office staff gave conflicting answers. In written evidence, the Home Office told inspectors that the relevant information is available on course-related documents and in the Immigration Rules, and visa holders were expected to check with their course providers and consult the Immigration Rules. However, the Home Office also acknowledged that STS students may be confused about their visa expiry date as they could be in possession of documents (eVisas, vignettes, decision letters, sponsor letters) showing different dates.
- 3.29** Visa cancellations due to non-compliance by either visa holders or their sponsors can lead to individuals becoming overstayers. Within the Work and Student routes, where a visa has been cancelled, individuals are typically granted

a maximum of 60 days to secure alternative employment, or a new educational placement, or to depart the UK. However, there were significant backlogs of cases awaiting cancellation. At the time of the inspection, there was an estimated backlog of 89,000 Work visa cancellation cases, with processing delays of up to seven months. In some cases, during enforcement visits, Immigration Compliance and Enforcement (ICE) teams were finding individuals whose visas had not yet been cancelled, resulting in ICE teams initiating cancellation themselves. This rendered these people as overstayers at that point, although some immediately claimed asylum.

Data and systems

3.30 There are significant gaps in Home Office data about overstayers, in part caused by the large number of IT systems used to record and manage the relevant processes. The Home Office told inspectors that staff used 23 systems to identify and manage overstayers, but during the onsite phase of this inspection, inspectors were made aware of more systems. Staff were vocal about the limitations of some of the systems and the difficulty of working across systems that were not joined up. In particular, staff from numerous teams repeatedly complained that information on overstayers was not easy to find on Atlas, described by the Home Office as its “comprehensive casework database”.

The problems were exacerbated by the inadequate guidance and training available to support Atlas users.

- 3.31** Poor and inconsistent record keeping added to the problem. For example, where a person has made a further application before their leave has expired, section 3C (s.3C) of the Immigration Act 1971 extends the original expiry date until the further application is decided. However, s.3C leave is not recorded consistently in Atlas, and individuals with s.3C leave can be wrongly identified as overstayers.
- 3.32** The Home Office uses data on the service of a Notice of Liability to Remove (NOL) for overstaying as the metric for identifying overstayers. However, NOLs being served late or not at all, issues with Atlas, and poor record keeping undermine the usefulness of this data. Of the inspected sample of 100 cases of individuals served with a NOL as an overstayer, 85 involved a claim for asylum, but only 56 of the 100 records on the CRS had been updated to reflect a subsequent asylum claim or overstayer status.
- 3.33** Data sources and datasets that could potentially help to paint a picture of the scale and nature of overstaying are, by the Home Office's own admission, unreliable and it is unable to produce robust estimates for the number of overstayers currently in the UK. ISA system data, which

enables the Home Office to monitor whether individuals have left the UK, does not capture every route or type of departure, such as departures via the Common Travel Area. This means that the Home Office cannot say with confidence whether individuals whose visas have expired, but for whom there is no record of departure, are still in the country or have left in line with their visa conditions. In response to the ICIBI's request for information about the numbers of overstayers, the Home Office signposted inspectors to the published exit check data from March 2020. Questions from parliamentarians and members of the public making Freedom of Information Act requests received the same response.

3.34 The Home Office has not published exit check data, showing the number of visa nationals not matched to a departure record, since 2020. Initially, the COVID-19 pandemic and the UK's exit from the EU were cited as reasons why it ceased publishing this data. But inspectors understood that weaknesses in the ISA data were the real issue. At the time of writing, the Home Office was developing a new system, Counting In, Counting Out (CICO), that would improve exit data by incorporating a broader set of compliance factors (these will include whether an individual has entered the UK more times than their visa permits, or whether their leave has lapsed if they have

been outside the UK for longer than permitted). However, CICO will still not capture all departures, notably some of those via the Common Travel Area.²¹

Identification of overstayers by the Home Office and external stakeholders

3.35 An individual who has overstayed their permitted leave and has no lawful basis to remain in the UK is not entitled to work or rent property. All employers (UK-wide) and landlords (England only) are required to ensure that employees or tenants have the necessary permissions to work or reside in the UK. They are able to conduct ‘Right to Work’ or ‘Right to Rent’ checks using original and acceptable documents, using Home Office online checking services via [GOV.UK](https://www.gov.uk), or using digital verification services for some British and Irish citizens. Between 1 January 2024 and

21 In 2022, the Home Office published an update entitled ‘Developments in Exit Checks’ on GOV.UK which outlines the challenges in measuring exit check statistics, and the development work needed to resume publication of these statistics. Home Office, ‘Developments in Exit Checks’, (published 24 February 2024). <https://www.gov.uk/government/statistics/developments-in-exit-checks/developments-in-exit-checks>

30 June 2025, the Home Office received 3,008 referrals from landlords wishing to report existing or would-be tenants without a right to rent, but just 85 referrals from employers wishing to report suspected illegal working, despite the extent of illegal working evident from enforcement activity.

3.36 The National Command and Control Unit provides a 24/7 telephone referral service that enables police forces and other government departments to check the immigration status of people that they encounter. In the year ending 31 March 2025, the referral service resulted in the identification of 6,983 overstayers, mainly from referrals from police forces.

3.37 Receipt, Evaluation and Development teams, part of Home Office Intelligence, are responsible for managing the system through which members of the public and other Home Office stakeholders can submit allegations of immigration abuse. Each allegation is assessed and, if actionable, (many are not because they lack key details) an ICE team may be tasked to make an enforcement visit. However, ICE team staff told inspectors that they rarely focus specifically on overstayers but frequently encounter them during illegal working visits, when many immediately claim asylum. They said that allegations regarding overstayers often referred to residential addresses. As these can quickly become out of date, enforcement

visits to work premises were a more effective use of resources.

Conclusion

- 3.38** The Home Office's inability to estimate overstayer numbers impacts decisions about investment, resource allocation, and operational priorities. Gaps in the data affect the Home Office's understanding of overstaying and its ability to target assurance checks at the visa application stage as efficiently and effectively as possible. Since preventing overstaying is easier than removing overstayers, improving risk profiling and visa decision making should be key priorities. This starts with accurate, consistent and (as far as possible) complete record keeping, which is a matter of setting and reinforcing expectations and standards and fixing systems, in particular Atlas.
- 3.39** With regard to enforcement action, there is a need for clear messaging across the Migration and Borders system about whether overstayers are a priority only where they go on to commit some other immigration offence, such as working illegally. Meanwhile, getting the external messaging right is important both as a deterrent to potential overstayers and to improve the reporting of overstayers by police and others who may encounter them. This inspection identified a number of 'live' and planned initiatives aimed

at improving the Home Office's response to overstaying, but like the current "amalgam" of measures they appear fragmented. While it is not the answer to everything, the ICIBI concluded that having a Senior Civil Servant with overall accountability for overstaying and overstayers would provide much-needed focus to what is a complex set of challenges.

4. Recommendations

The Home Office should:

Recommendation 1: Leadership and strategy

Appoint a Senior Civil Servant (SCS) as the Migration and Borders (M&B) System lead for overstayers, tasked with overseeing the creation of a strategy for preventing overstaying, and identifying and removing overstayers (or regularising their immigration status). As a first step, the SCS lead should catalogue the strands of current and planned activity that contribute directly or indirectly to the Home Office's understanding of and response to overstaying and overstayers, using this to produce a gap analysis and action plan, and to ensure that the risks surrounding overstaying and overstayers are properly reflected in risk registers at all levels across the M&B System.

Recommendation 2: Record keeping and information management

Audit the IT systems used to record and manage overstaying and overstayers with the aim of reducing the number of systems in use, fixing 'bugs' and issues that impact efficiency and effectiveness, and standardising and assuring record keeping, ensuring that current and historic information and data about overstaying and

overstayers (caveated as appropriate) can be accessed by whoever has an approved business need. This should include:

- displaying visa duration dates on the Atlas landing page, similar to the way in which they are found on the Central Reference System (CRS) landing page
- flagging previous overstaying clearly on Atlas and specifying lengths of overstaying periods on both CRS and Atlas
- providing decision makers with access to the Management and Data Analytics Service (MIDAS) Travel Data Service to enable them to ascertain travel history more readily
- ensuring that Initial Status Analysis (ISA) data is requested for every individual after the expiry of their visa, to enable an 'ISA identity status' to be displayed clearly on Atlas
- ensuring that section 3C (s.3C) leave is recorded consistently in Atlas and that individuals with s.3C leave are not included in data for current overstayers

Recommendation 3: Communication

Develop internal and external communication plans covering overstaying and overstayers, identifying (and updating as appropriate) key messages, target audiences, delivery methods, and metrics for measuring effectiveness. This should include:

- creating (or re-focusing) boards and forums to share knowledge and experience of overstayers and overstaying between M&B directorates and business areas, and between the Home Office and stakeholders
- reviewing Home Office engagement with visa sponsors, creating the means for sponsors for each of the different routes to share their knowledge and experience of overstaying and overstayers
- (with input from stakeholders) reviewing guidance and messaging where these have a bearing on overstaying and overstayers, and ensuring that they are clear and unambiguous (taking account of the fact that visa applicants may have limited English)
- (in order to develop a better understanding of the factors that lead to overstaying) ensuring that the Home Office's information and intelligence requirements in relation to overstaying are clearly defined and are understood by teams within the Home Office who encounter overstayers, and by others, such as the police

- examining ‘Right to Work’ or ‘Right to Rent’ referrals to establish whether the system is working and, in particular, why employer referral numbers are so low
- producing a response to questions about the size and nature of the overstaying population that does not fall back on exit check data published in 2020

Recommendation 4: Visa decision quality management

Review quality management in relation to visa decision making, ensuring that quality is not being compromised by the daily benchmarks set for decision makers. This should include:

- regularly updating training for decision makers and for entry clearance managers to reflect identified risks and issues, for example, overturned decisions and poor-quality refusal letters
- ensuring that Immigration Enforcement reports all confirmed instances of overstaying to the relevant team(s) within Visa, Status and Information (VSI), using this feedback to review visa decisions, facilitate learning, and improve future decision making

Recommendation 5: Visa cancellations

In order to reinforce the importance of visa holder compliance, as a matter of urgency, review the backlogs

of visa cancellation cases and identify how these can be reduced to manageable levels. Also review how cancellation processing times can be cut to a maximum of two months, if necessary, surging staff resources to bring the backlogs and timescales down initially.

5. Inspection findings: Governance

Defining the overstayer cohort

5.1 According to the Immigration Rules:

“‘Overstayed’ or ‘overstaying’ means the person has stayed in the UK beyond the latest of:

(a) the time limit attached to the last permission granted; or

(b) the period that the permission was extended under section 3C or 3D of the Immigration Act 1971.”²²

5.2 In light of this statutory definition of overstaying, inspectors asked the Home Office to confirm which cohorts it considered when determining whether someone was an overstayer. The Home Office responded that:

“Overstayer cohorts are anyone who had a valid visa whose leave has expired and meets the [statutory] definition. This can apply to

22 Home Office, ‘Immigration Rules: introduction’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-introduction>

individuals who entered or sought further leave to remain on routes including:

- All work and student routes, including the points-based system
- Visitors
- Appendix Long Residence
- Appendix UK Ancestry
- Most discharged His Majesty's (HM) forces
- Family”.

5.3 While Home Office staff agreed with how the Immigration Rules defined overstaying, in interviews and focus groups staff were less clear about what this meant in practice. For example, if an individual overstayed the expiry date of their visa and went on to work illegally, there was some confusion as to whether they should be treated solely as an illegal worker, or as an illegal worker and as an overstayer. One Home Office manager told inspectors: “We lack a clear business definition of an overstayer.” Another commented that “overstayers cross over a lot so it makes it tricky to define”, and they felt there was a need for the term “overstayer” to be “clarified”, because “overstaying is intertwined with other immigration offences”.

- 5.4** Several staff in Visa, Status and Information Services (VSI) and Immigration Enforcement (IE) told inspectors that the ‘overstayers cohort’ referred only to individuals who had simply overstayed, and any overstayers who made a subsequent asylum claim or worked illegally would not be counted as overstayers. Their thinking was influenced by when the Home Office knew what. For example, whether an individual was considered part of the overstayer cohort depended on whether the Home Office had already identified them as an overstayer before they were found to have been working illegally.
- 5.5** A Home Office policy manager explained that there was confusion with the ‘overstayer cohort’ definition because overstayers are “tied up with something else that becomes the focus. For example, overstayers might be encountered by IE, and go on to claim asylum – the asylum claim becomes the focus, rather than the overstayer element. Should they move out of the asylum bucket or stay in the overstayer one?”
- 5.6** Meanwhile, an IE senior manager told inspectors that overstaying and illegal working was a problem that needed to be tackled “from both ends” and they were “chicken and egg”. They believed that disincentivising overstaying would also help to disincentivise illegal working.

5.7 The inconsistent approach to overstayers risked underestimating the scale of overstaying and, in turn, affecting the priority the Home Office attached to tackling overstaying. A manager within VSI told inspectors that:

“The number is so small for overstayers as they generally go on to claim asylum or work illegally. The data on overstayers specifically therefore will be so small, it is difficult for it to have a big impact on what we do.”

Another senior manager commented that if the overstaying figures were bigger “it would change the threat assessment” and affect decisions about operational activity.

Overstaying strategy and leadership

5.8 Inspectors asked the Home Office for details of its strategy to prevent overstayers. In response, the Home Office stated: “There is not a single policy or strategy document to prevent overstaying.”

5.9 Instead, the Home Office described its strategy as:

“an amalgam of:

(i) anxious scrutiny of visa and renewal applications to reject those likely to overstay;

(ii) a suite of policies and powers designed, within civilised boundaries, to make

it difficult to subsist in the UK as an overstayer;

- (iii) a clear legal framework of powers to remove overstayers when encountered;
- (iv) and targeted use of enforcement activity to identify and remove overstayers. This is a whole-system issue and, as such, it is a priority for leaders across the organisation. The Home Secretary has outlined in the Immigration White Paper (paras 222-231) action to strengthen our enforcement of the immigration system.”

5.10 The sections of the ‘Restoring control over the immigration system: white paper’ cited by the Home Office refer to: enforcement; the use of eVisas and electronic travel authorisations regimes to “tackle visa abuse”; aims to prevent illegal working; technology for enforcement teams; and rules for sponsors “flouting employment law”.²³

5.11 The ICIBI also asked the Home Office for details of the senior official(s) responsible for the prevention of overstaying and the detection of overstayers. The Home Office replied:

23 Home Office, ‘Restoring control over the immigration system: white paper’ (published 12 May 2025). <https://www.gov.uk/government/publications/restoring-control-over-the-immigration-system-white-paper>

“Overstayers cut across a number of areas within the migration and borders system. As such, there is no single senior civil servant (SCS) responsible for overstayers within the Home Office.”

5.12 Inspectors asked a range of staff what impact, if any, the absence of a Migration and Borders System lead for overstaying had on their day-to-day work. One VSI manager told inspectors: “it would be useful to get more of a grip on overstayers, but it is the data and systems that need to improve and that sits at a senior level”. However, the majority of staff who spoke to inspectors said that “a senior responsible owner” (SRO) would have no impact on their daily work. In contrast to the Home Office’s description of overstaying as “a priority for leaders across the organisation”, staff said it was not treated as a priority. A Home Office senior leader stated there was no impact in not having an SRO, as overstaying is “not classed as a top priority” and “there is an ambition on illegal working, but no ambition around overstayers”. Consequently, they agreed that having an SRO for overstaying would have no impact. However, other managers referred to “gaps” and “a lot of grey areas”, and one told inspectors: “There is no one looking strategically across everything.”

5.13 The abuse of legal routes is discussed at the Customer Service Board, attended by VSI

directors. Inspectors were informed that the Customer Service Board risk register included a risk related to overstayers under the abuse of legal routes. However, inspectors were unable to find any risks specifically concerning overstayers recorded on any centrally held risk register maintained by VSI, IE or Home Office Intelligence (HOI). A senior manager told inspectors that, at a decision-making level, there would be an overstaying strategy to consider this risk; however, the Home Office was unable to refer inspectors to evidence of overstaying featuring on any local risk registers.

The relative priority of overstaying

- 5.14** Inspectors found that other immigration issues, including asylum claims and illegal working, were prioritised above overstaying in intelligence gathering, visa decision making, and IE tasking. Staff from HOI, VSI and IE cited the financial costs associated with asylum claims and the risks to the public from Foreign National Offenders as reasons why other immigration issues were prioritised above overstayers. However, more recently, the Home Office increased the priority it attached to overstaying, having reassessed its impact.
- 5.15** Intelligence Analysis and Assessment, part of HOI, published a Threat Assessment entitled ‘Non-Organised Immigration Crime Control Strategy’,

(NOICCS) (September 2024). Along with the ‘Organised Immigration Crime Control Strategy,’ the NOICCS forms the ‘Immigration Enforcement Control Strategy’, which is used to prioritise operational activities.

5.16 The NOICCS listed the key threats. Its aim was to ensure that IE’s “response across all Control Strategy areas will be in accordance with the vision and mission to STOP, MANAGE, REMOVE and PROTECT.” Each key threat was assigned a priority level, from A to D, with ‘A’ being the highest priority. Overstaying was considered as part of the key threat of ‘Compliance Abuse’ and was prioritised at level D, while illegal working and foreign national offenders were prioritised at level A.

5.17 The NOICCS was revised in June 2025, and the ‘Compliance Abuse’ threat was renamed ‘Non-compliance with UK Immigration Law’ and prioritised at level B. The higher priority was due to compliance abuse having an increased impact on the community, including the consideration of pressures on the NHS. In September 2024, this impact had been rated as “substantial”. In June 2025, it was reassessed as “critical”. A Home Office Intelligence manager explained that the “critical” assessment was:

“...predominantly around whether there is a long-term impact... as a result of the criminality

associated with the threat. So, overstaying was deemed to have a long-term impact in various areas across the UK.”

- 5.18** The increased priority was also due to input from several stakeholders including Home Office Analysis and Insight which suggested that the Home Office Intelligence risk assessment of overstaying should consider an increase in the 12-month forecast of overstaying, to “account for more migrants entering the UK post pandemic” which meant that the number of overstayers could increase, at least in parallel with the increased overall volumes of immigration.
- 5.19** While HOI staff were aware of the increased priority attached to overstayers, staff in other areas were not, including the majority of VSI staff to whom inspectors spoke. Within IE, staff were either unaware of the change or believed that the new priority for overstayers was not as high as it was.
- 5.20** One senior manager suggested that the increased priority for overstayers could lead to more resources looking at the abuse of legal routes, leading to “better data on trends”. However, other managers and staff in HOI, VSI and IE did not believe that it would impact their work, and an IE senior manager cast doubt on whether it would increase enforcement activity, as they believed it

would require ministers to direct that overstaying should be a priority for this to change.

6. Inspection findings: Prevention – visa decision making

“Anxious scrutiny” of visa applications

- 6.1** Some individuals who overstay in the UK are non-visa nationals. They are granted entry at the UK border and then remain in the country beyond their permitted stay.²⁴ Others are visa nationals, who must apply for and obtain an entry clearance before travelling.
- 6.2** The Home Office told inspectors that one of its key strategies to prevent overstaying is the “anxious scrutiny” of visa applications, to refuse those likely to overstay. Inspectors therefore reviewed visa decision making across three short-term entry clearance categories: Visit visas; Short-term Student (STS) visas; and Temporary Worker visas. These visa types usually require applicants to leave the UK on or before the visa expiry date, unlike long-term visa routes which typically offer the possibility to extend immigration status, switch

24 Non-visa nationals are nationals of countries that do not require a visa to travel to the UK.

to other visa categories, and potentially lead to settlement in the UK.

Visa application volumes

Visit visas

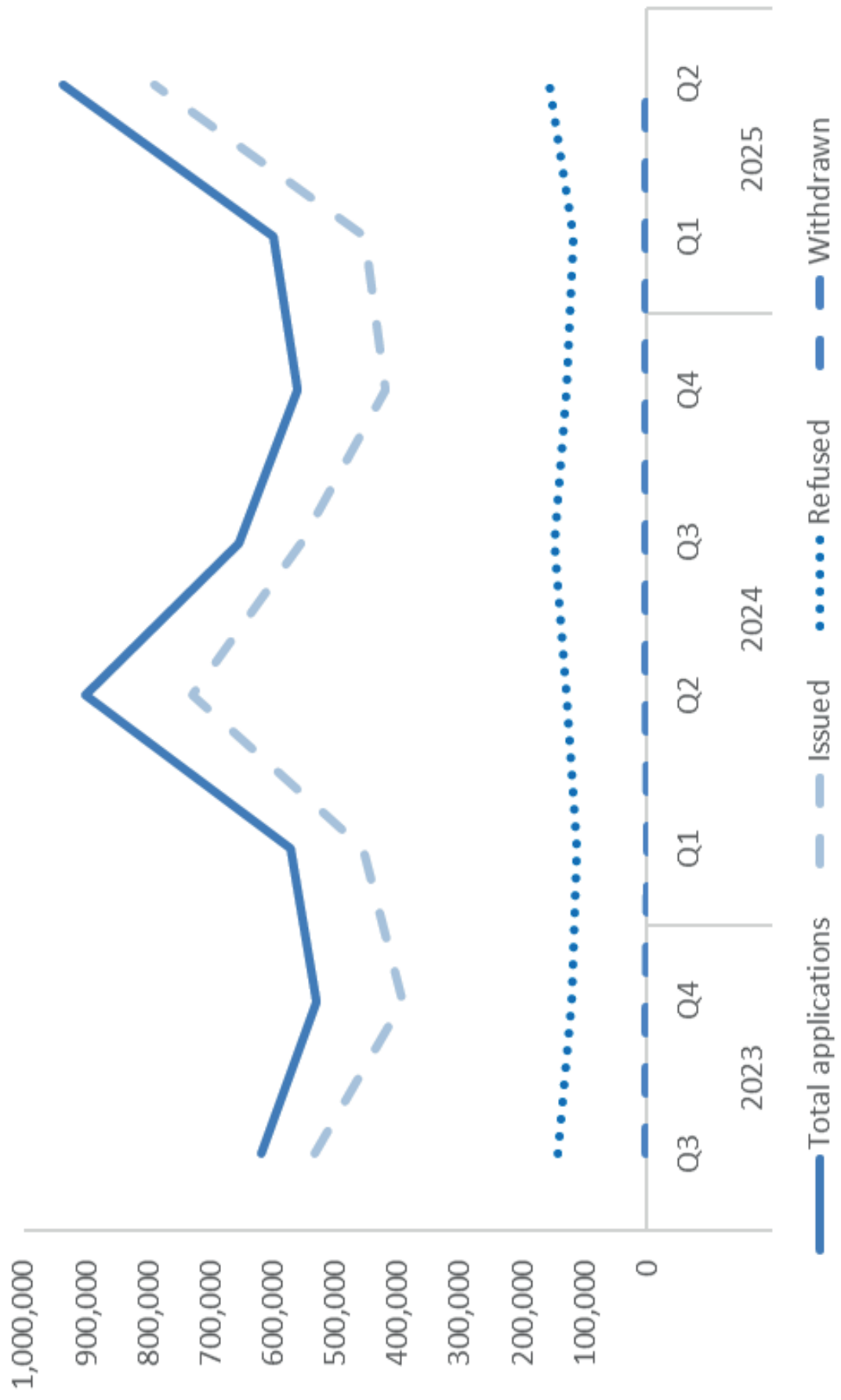
6.3 A standard Visit visa permits a stay of up to six months. Visit visas account for the highest volume of UK visa applications. In the year ending 30 June 2025, over 2.75 million Visit visa applications were submitted (representing a 5.1% increase on the 2,623,009 applications received in the year ending June 2024). During the same period, 2.78 million Visit visa outcomes were recorded, of which 2,218,947 (79.9%) were issued, 553,632 (19.9%) were refused, with the remainder recorded as withdrawn or not concluded.^{25,26}

6.4 Figure 2 shows the number of Visit visa applications submitted between Q3 (July to September) of 2023 and Q2 (April to June) of 2025 and highlights the seasonal fluctuations.

25 Home Office, 'Immigration system statistics, year ending June 2025' (published 21 August 2025). <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-june-2025>

26 The outcome visas do not equate directly to the visa applications submitted during this period, as some outcome visas will have been submitted prior to July 2024.

Figure 2: Visit visas applied for, issued, and refused (Q3 of 2023 to Q2 of 2025)

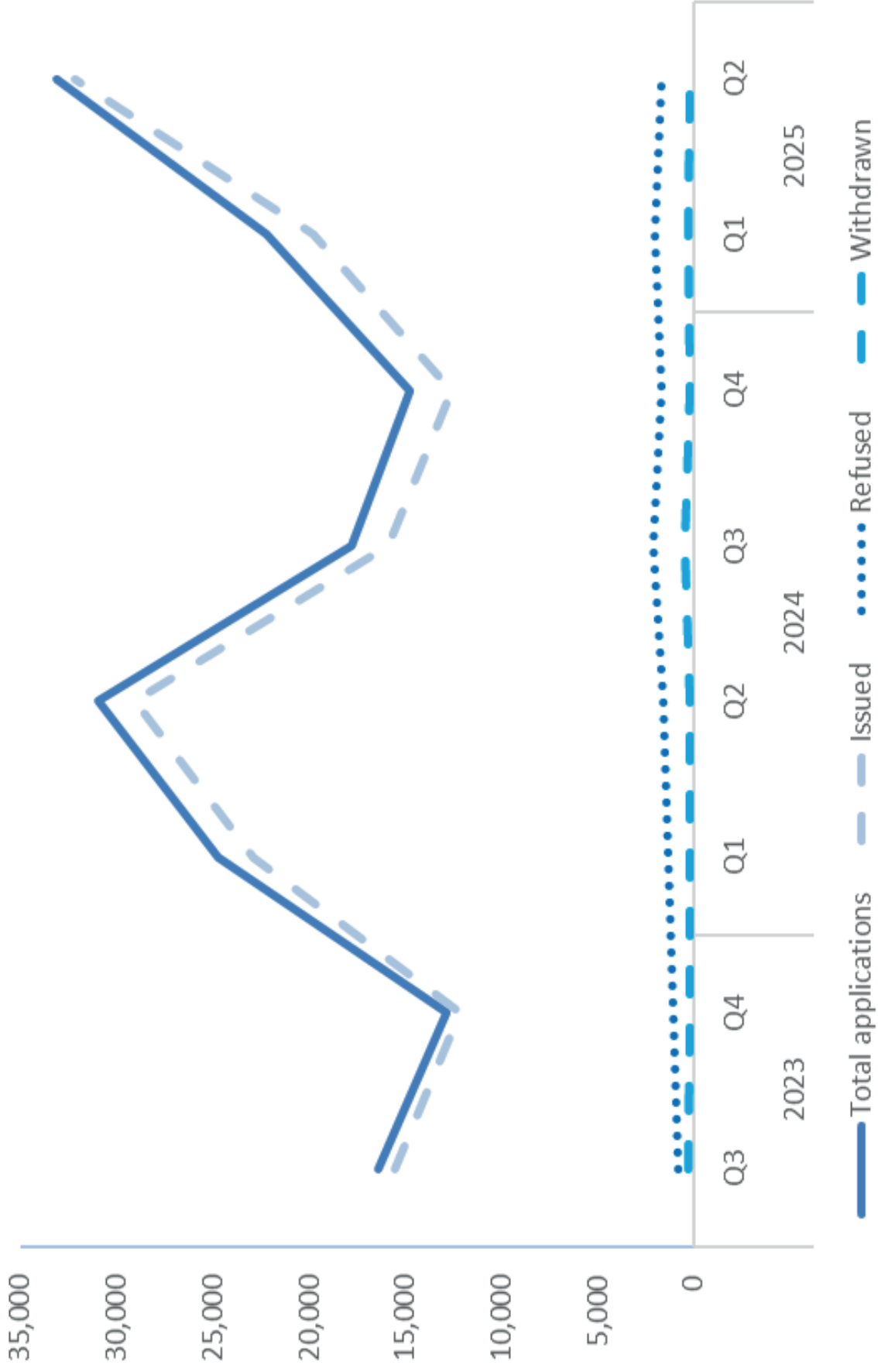


Work visas

6.5 The Work visa service line includes long-term Sponsored Worker routes and Temporary Worker routes. Inspectors focused on Temporary Workers applying to work in the UK for up to 12 months. In the year ending June 2025, 87,837 applications were received for Temporary Work visas. During the same period, outcomes were recorded for 88,900 applications, of which 80,436 (90.5%) were issued, 7,391 (8.3%) were refused, and the remainder withdrawn or not concluded. With these visas, the seasonal variations in the number of applications received are similar to Visit visas, though more pronounced, with peaks occurring in Q2 (April to June) of each year and troughs in Q4 (October to December).²⁷ See Figure 3.

²⁷ Home Office, 'Migration transparency data' (last updated 1 September 2025). <https://www.gov.uk/government/statistical-data-sets/migration-transparency-data>

Figure 3: Temporary Worker visas applied for, issued, and refused (Q3 of 2023 to Q2 of 2025)



- 6.6** Of the total number of Temporary Worker visa application outcomes recorded, 38,924 (44.3%) were applications for Seasonal Worker visas.²⁸
- 6.7** The Seasonal Worker route allows individuals aged 18 and over to undertake temporary agricultural work in the UK for up to six months within any 12-month period, under the sponsorship of an approved provider. This route operates under an annual quota, which for 2025 includes 43,000 places allocated to the horticultural sector and 2,000 to the poultry production sector.²⁹

Student visas

- 6.8** The Student visa service line includes long-term Sponsored Students and Short-term Student (STS) visas. Inspectors focused on STS, which is the visa route for individuals aged over 16 years old who wish to take an English language course

28 Home Office, 'Migration transparency data' (last updated 1 September 2025). <https://www.gov.uk/government/statistical-data-sets/migration-transparency-data>

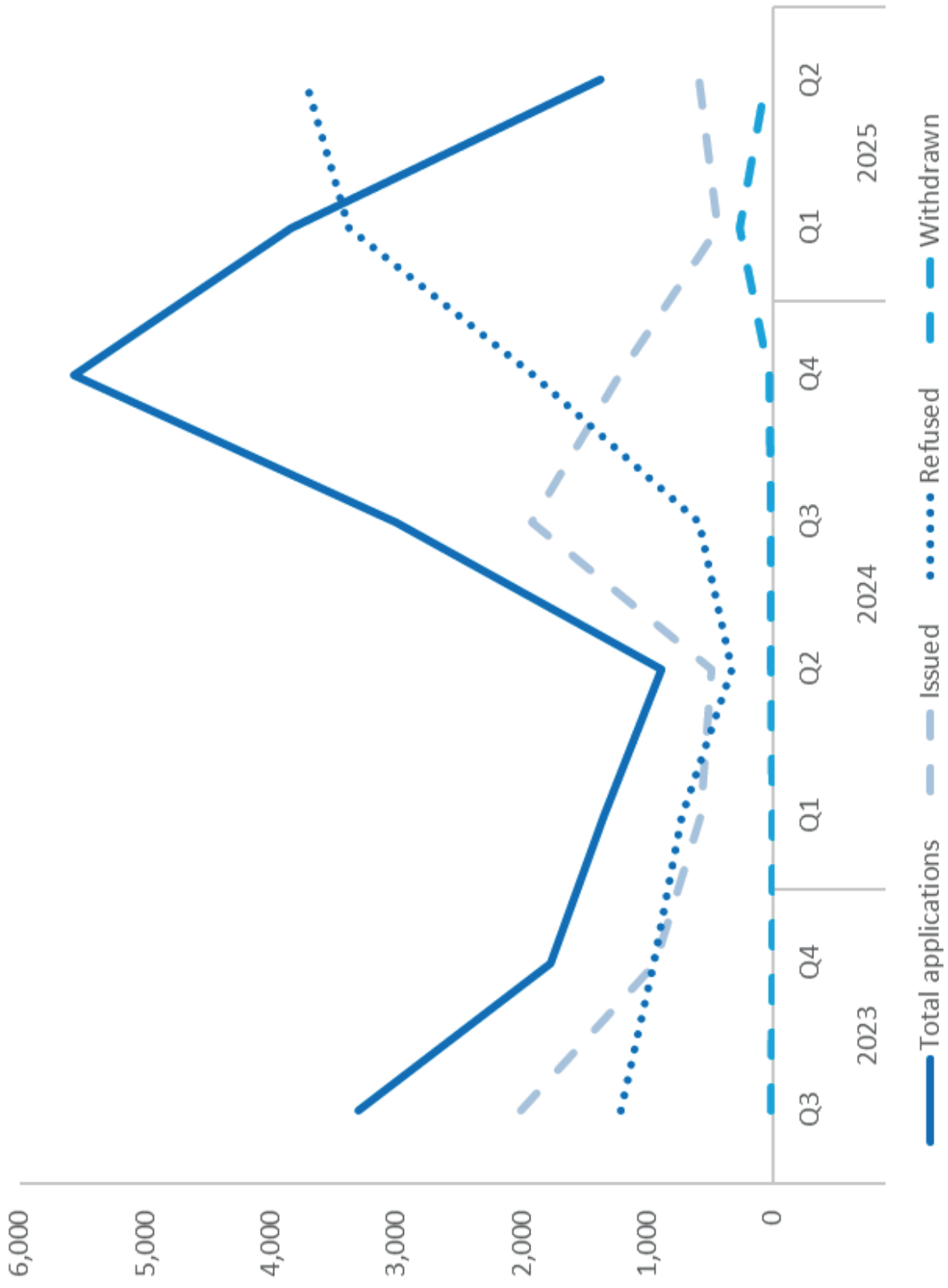
29 UK Visas and Immigration, 'Workers and Temporary Workers: guidance for sponsors: sponsor a seasonal worker' (updated 9 April 2025). <https://www.gov.uk/government/publications/workers-and-temporary-workers-guidance-for-sponsors-sponsor-a-seasonal-worker>

at an accredited institution for between six months and 11 months.³⁰

6.9 In the year ending June 2025, there were 13,780 STS visa applications, representing an 88.7% increase compared to the 7,238 applications received in the year ending June 2024. There was a sharp increase in STS applications from Q2 of 2024, which reached a peak of 5,569 in Q4 of 2024. While there are normally seasonal variations in student applications, the number of applications was abnormally high. Many of these applications were judged by the Home Office to be of poor quality, resulting in an increase in refused applications from Q3 of 2024. The number of applications received subsequently decreased, and in Q2 of 2025 it was down to 1,369, although this was still 54.9% higher than the number of applications (884) received in Q2 of 2024. See Figure 4.

30 Home Office, 'Immigration Rules Appendix Short-term Student' (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-short-term-student-english-language>

Figure 4: Short-term Student visas applied for, issued, and refused (Q3 of 2023 to Q2 of 2025)



Decision makers

- 6.10** Home Office visa decision makers (DMs) are either Executive Officers (EOs) or Administrative Officers (AOs), depending on the visa route and complexity of the applications. Inspectors asked for details of the numbers of full-time equivalent staff working on the Visit, Work and Student visa routes.
- 6.11** According to the Home Office, in July 2025, there were 663.56 EO and 1,006.33 AO members of staff working on Visit visas.
- 6.12** Within the Work visa service line, staff may be assigned to a range of Work visa routes. The number of staff assigned to Temporary Worker visa applications fluctuates in accordance with the volume of applications received. Inspectors were informed that “on a typical working day” approximately 50 EOs and 14 AOs are responsible for assessing Temporary Worker applications. However, during peak periods, such as March and April, additional staff are drafted in as Temporary Worker visa DMs, including an average of 20 EOs per week from the Work Interview team.
- 6.13** Within the Student visa service line, there are 80 EOs and 91 AOs covering all student routes. STS DMs are all EOs and are drawn from this pool of staff. Dedicated STS staffing figures fluctuate from

between 2.31 EOs in April to 12.22 EOs in August, reflecting the seasonal variations in applications.

The importance of making good visa decisions

6.14 Making good decisions at the visa application stage is crucial, as once an individual has been granted a visa to enter the UK it is often difficult to track their whereabouts and to remove them should they overstay. A senior manager told inspectors:

“Getting visa decisions right is really important and UKVI [UK Visas and Immigration] recognise that. Once someone is in the UK your contact points with them become limited and so you need the decision to be right first time.”

6.15 All visa decision making by Visa, Status and Information (VSI) Services must follow the Immigration Rules for the specific visa route, ensuring that applicants meet the relevant eligibility requirements. Applications are also subject to mandatory checks to enable DMs to screen out applicants on suitability grounds under part 9 of the Immigration Rules.³¹ This relates to

31 Home Office, ‘Immigration Rules’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules>

those who are refused on the grounds of false representations, criminality, a deportation or exclusion order, a previous breach of immigration rules, or failure to provide required information.

Mandatory checks

- 6.16** Under the UKVI ‘Operating Mandate’, all applications are subject to mandatory checks by VSI staff. Biometric details are checked against IDENT1, the UK police database, IDENT Special Collection (SC), which holds fingerprints connected with a range of very serious crimes, and the Immigration and Asylum Biometric System (IABS), which contains details about previous encounters with the UK immigration system. IDENT1 contains details of everyone who has been arrested, charged, cautioned, or convicted of an offence, and had their fingerprints taken by the police. The outcome of this check must be received before the application can be concluded by a DM.
- 6.17** Biographic checks are also conducted on the Border Crossing (BX) tool³², and the Central Reference System (CRS) containing details of visa applications. The results of the BX, IABS and

32 The Border Crossing (BX) tool is used to access adverse information about migrants, which might be of interest to the Home Office or National Crime Agency, and other organisations, for example, the police or Interpol, both in the UK and abroad.

IDENT1 checks are shown in the Visa Identity Management Application (VIMA). These Home Office checks identify whether the applicant has previously applied for a visa, and whether the individual has come to the attention of the Home Office in the UK, for example, as a previous overstayer or asylum seeker. If so, they should show up as a 'VIMA match', the reason for which should be recorded on Atlas. IABS matches to previous visa applications only, may not be an adverse match, and the DM would investigate CRS to check whether previous applications were issued or refused, and the reasons for refusal. In the Visit visa service line, cases that are an adverse 'VIMA match' are referred to the specialist Match team for extra scrutiny.

- 6.18** Where a person has previously overstayed in the UK and been removed, they are normally subject to a re-entry ban. This is recorded on Atlas in an 'alert', created by Immigration Enforcement at the point of removal. The length of the re-entry ban is dependent on the circumstances of the individual's removal, but can range from 12 months to ten years (see Figure 1).
- 6.19** A DM may also identify previous periods of overstaying in the UK, either through the applicant's own admission on the Visa Application Form or through supporting documents. Where the DM suspects the individual has previously

overstayed, but there is no re-entry ban on Atlas, they must calculate the period of overstaying and follow 'Applications from Overstayers' caseworker guidance to determine whether they can disregard the period of overstaying or whether a mandatory ban should be imposed.³³ Atlas does not calculate the length of any overstaying period, so DMs have to do this manually.

6.20 DMs may also conduct checks on the immigration status of sponsors or family members of the applicant who have previously been issued with UK visas to establish whether they have complied with their visa conditions. However, DMs told inspectors that these checks were not mandatory.

6.21 While a visa applicant's previous non-compliance with visa conditions is taken to indicate a risk that they may overstay, previous compliance does not necessarily signal that they will not overstay if granted a further visa. In the sample of 100 overstay case records examined by inspectors, seven individuals had previously travelled to the UK and left again, in line with their visas. A further seven had travelled within the Schengen area, without incident.

33 UK Visas and Immigration, 'Applications from overstayers: caseworker guidance' (updated 4 February 2025). <https://www.gov.uk/government/publications/applications-from-overstayers-non-family-routes>

Compassionate circumstances

- 6.22** Section 39E of the Immigration Rules allows a period of overstaying of up to 14 days to be disregarded by casework DMs where there is a good reason, beyond the control of the applicant or their representative, as to why they were unable to apply for an extension within time.³⁴
- 6.23** Home Office ‘Applications from overstayers’ guidance states that DMs are able to exercise discretion under “exceptional or compassionate circumstances” where the application was submitted after the 14-day period, for example, where an individual suffered from a serious medical condition that lasted beyond 14 days. If a DM decides to use discretion, it must be authorised by staff at Higher Executive Officer (HEO) grade or above.
- 6.24** DMs must assess each case on its merits, considering the applicant’s overall immigration history and personal circumstances. For example, where an applicant has previously travelled with a multiple entry Visit visa and stayed a week on their final entry but overstayed the visa expiry date by a

34 Home Office, ‘Immigration Rules part 1: leave to enter or stay in the UK’ (updated 4 September 2025), ‘Exceptions for overstayers’. <https://www.gov.uk/guidance/immigration-rules/immigration-rules-part-1-leave-to-enter-or-stay-in-the-uk>

day or two, the DM might consider that it does not critically damage their credibility when they next apply for a Visit visa. However, a DM may doubt the credibility of a visitor who remained in the UK for over the permitted six months, with no known justifiable reason, when their stated intention was to stay in the UK for only one week.

Consideration of the risk of overstaying

- 6.25** The Immigration Rules do not explicitly address the risk of individuals overstaying their visas. However, many immigration categories include the requirement for applicants to demonstrate a clear intention to leave the UK before their visa expires, or to satisfy ‘genuineness’ criteria specific to the visa route in question.
- 6.26** For short-term visa categories, such as Visit visas, applicants must satisfy the Home Office of their intention to leave the UK. Other temporary visa routes, such as the Skilled Worker route, do not have this requirement, as individuals may apply to extend their stay from within the UK.
- 6.27** Caseworker guidance is issued to DMs for each visa category, detailing how to assess applications in accordance with the relevant provisions of the Immigration Rules, including considerations of the applicant’s intention to leave and the genuineness of their application, where relevant.

- 6.28** Guidance on the Visit route for Home Office staff states that:
- “Supporting documents should back up evidence statements made on the visa application form.”
- 6.29** DMs told inspectors that, when deciding whether to issue or refuse a visa application, they consider a variety of factors including information on the Visa Application Form, the applicant’s stated intentions, travel history, personal circumstances, family ties, employment, finances, and links to the UK. Supporting documents, such as bank statements, education certificates and qualifications, and letters of invitation or sponsorship also help DMs to assess an application.
- 6.30** Managers told inspectors that, while the risk of overstaying is considered as part of the broader evaluation of an applicant’s overall credibility, DMs did not consider overstaying in isolation. Some DMs said that they did not routinely consider the specific possibility of overstaying as the focus was on potential asylum claims. They said that the risk of overstaying “does not make up much of [our] thought process”.
- 6.31** A senior manager confirmed that asylum claims were a key focus, due to their “measurability” and high cost. While overstaying is a concern, it is

secondary to asylum claims and abuses of legal routes, like illegal working, despite the fact that there was often an overlap between overstaying and these other problems.

6.32 Inspectors were told that there had been a rise in litigation over the past decade, which had led to complex case law in visa decision making. A senior manager said that this had made it harder to judge the weight that should be given to different factors when assessing visa applications. For example, while human rights issues are more obviously a consideration in long-term, family-related cases, it is difficult to know how to approach such issues in short-term visa applications, where an individual's stated intention is to visit the UK only for a limited period.

Enrichment

6.33 Following an initial assessment of the application, DMs can request 'enrichment' in the form of additional checks or interviews where they believe further information or explanation may assist the decision-making process. Enrichment checks are conducted by dedicated Enrichment teams. One cross-cutting enrichment team covers Work, Study and Family service lines, while individual enrichment teams cover other service lines or decision-making centres in the case of the Visit service line. Separate Risk teams support this

process by providing briefings and data on current risks and harms, which guide DMs on appropriate actions. For example, on the Work visa service line, one applicant's profession may necessitate verifying their qualifications, while another applicant's profession may require an interview.

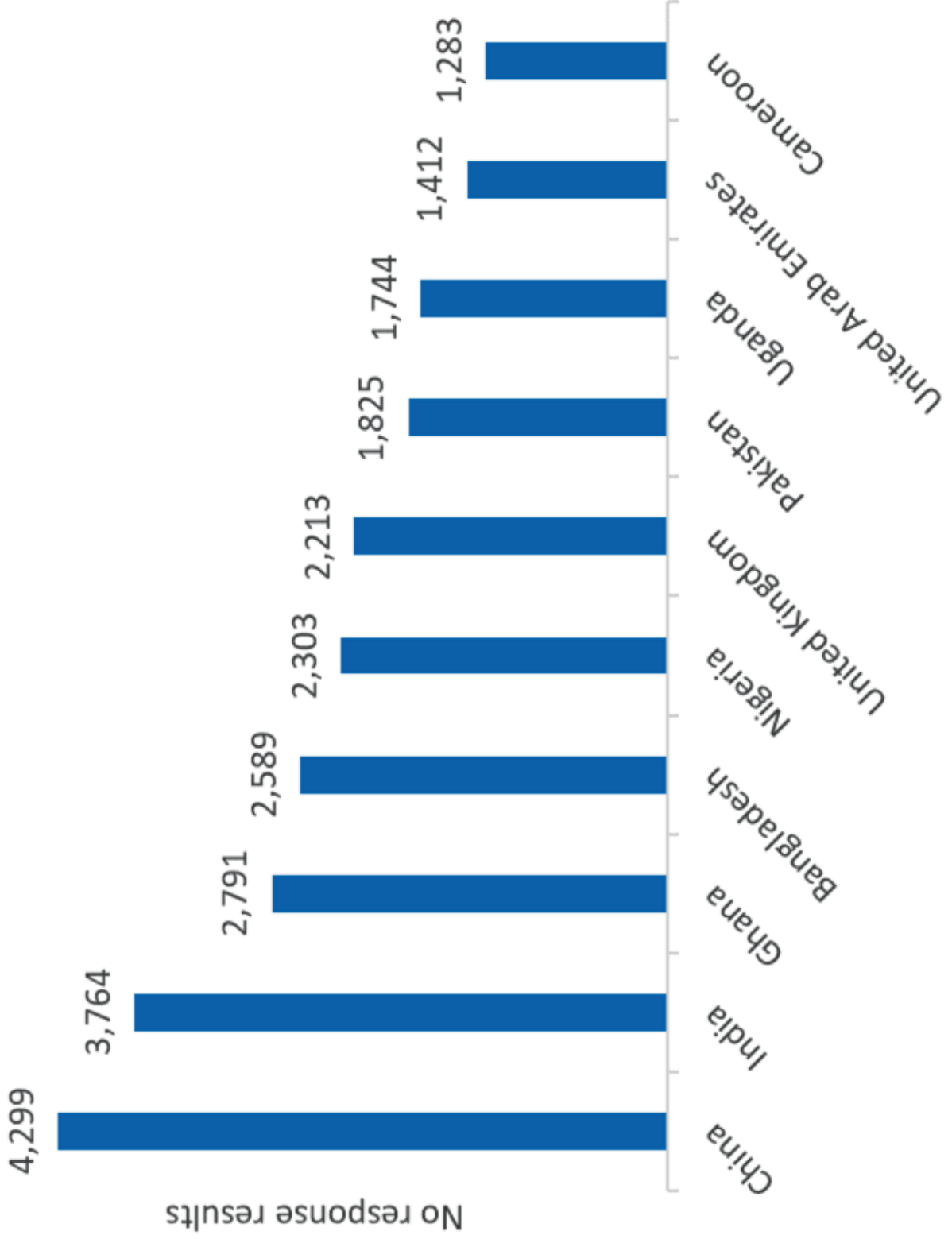
- 6.34** Enrichment checks may involve requesting additional evidence from the applicant or verifying documents already submitted, such as bank statements or passports. These checks serve as a valuable means of corroborating, or contradicting, the applicant's stated intentions in applying for a visa. They help DMs to assess the credibility of the application and identify individuals who may pose a risk of overstaying or committing other immigration offences.
- 6.35** To request further checks on a visa application, DMs must complete a Microsoft Teams form and send it to the Enrichment team. The Enrichment team then conducts the checks and updates the applicant's Proviso³⁵ record with the check results.
- 6.36** The Enrichment team told inspectors that conducting verification checks can be challenging as they do not always receive a response, and record keeping can be poor in some countries. The team allows three days for a verification

35 Proviso is the visa application system used by visa decision makers.

check response, after which they send a 'chaser' email. If they have still not received a response after a further three days, the check is recorded as "unable to verify", and the visa application is assessed against the evidence that exists. Inspectors were told that this process was designed to ensure that the business area meets the 15-day service level agreement for standard non-priority visa applications. However, as a result, some decisions have to be made without a full understanding of the facts or the authenticity of certain supporting documents.

- 6.37** The sample of 100 overstayer cases examined by inspectors included 22 where the Enrichment team had sought to verify documents. In six (27.3%) of the 22 cases there was either no response, or the response was 'inconclusive'.
- 6.38** Between 1 January 2024 and 30 June 2025, no response was received for 36,263 document verification checks requested in relation to Visit visas. The largest number of checks that received no response were those conducted in China (4,299 or 11.9%) and India (3,764 or 10.4%). However, the problem was not just with overseas checks, as 2,213 (6.1%) checks conducted within the UK also produced 'no response'. See Figure 5.

Figure 5: Top ten countries producing 'no response' results from document verification checks for Visit visas



- 6.39** Between 1 January 2024 and 30 June 2025, 704 document verification requests in relation to Temporary Work visa applications received no response, the majority of which related to Creative Worker applications (402) and Charity Worker applications (174). In the STS route, 257 document verification checks received no response.
- 6.40** VSI staff told inspectors that some companies do not have the capacity to conduct large volumes of checks on behalf of VSI. For example, a manager told inspectors that colleagues in Vietnam can only request seven verification checks a day from local organisations. Onshoring (moving visa decision making from overseas DM posts to the UK) had made enrichment checks more difficult in some locations, but DMs told inspectors that Home Office colleagues overseas had been able to assist with verification checks in some high-risk safeguarding cases, for example, those involving children, through their local contacts.
- 6.41** The Central Risk team (CRT), within Cross-Cutting Service Operations, was created in November 2023 to reduce the number of asylum applications associated with issued visas. In June 2025, inspectors learned that the CRT had recently held a conference to bring staff from the Enrichment teams together to share knowledge and contacts. Inspectors were also told that the CRT was trying to standardise enrichment checks across the

service lines and had developed an ‘enrichment app’, which was currently being tested.

Exit check data

6.42 At the time of this inspection in June 2025, DMs did not have direct access to exit check data to help them determine whether an applicant had previously overstayed, where this information was not evident from the Atlas system or the applicant’s passport. Where a DM required exit check data, they had to submit a request via a spreadsheet to the Enrichment team, who then consulted the Management and Data Analytics Service (MIDAS) Travel Data Service to retrieve the applicant’s travel history.³⁶

6.43 A VSI senior manager told inspectors that, if DMs had direct access to travel history data, it would improve the identification of previous overstaying. It would also offer greater assurance in low-risk cases which would not previously have merited the time involved in submitting a travel history check.³⁷

36 The MIDAS Travel Data Service provides travel movements of non-British citizens over a rolling five-year window.

37 In its factual accuracy response, the Home Office stated: “This information is already captured in CARS [Complexity Application Routing Solution] for the Visit service line.”

Open-source and social media checks

- 6.44** Open-source online research may be used as part of enrichment checks. This involves researching publicly available information about an applicant to identify any concerns that could “undermine public confidence or indicate a security risk”. It can also help verify application details, such as the existence of a company through its online presence, or confirm the details of an artist or event in the case of a Creative Worker visa application. If information that should be publicly available through open-source research cannot be verified, it may indicate that the applicant has provided inaccurate details, potentially posing a risk of overstaying or committing other immigration-related offences.
- 6.45** Home Office IT systems restrict access to social media platforms and staff are not permitted to use their personal devices to conduct checks on applicants’ social media accounts. However, managers told inspectors that, when justified, social media checks can be requested through intelligence colleagues who are trained and equipped to carry out such investigations in accordance with the Home Office Social Media Policy. According to Home Office guidance, these checks should be conducted only in exceptional cases involving serious crime or national security,

which limits their use to a tiny minority of visa applications.

Interviews

- 6.46** DMs make an initial assessment of the case based on the visa application form, the results of mandatory checks, and supporting documentation or other evidence, in line with the Immigration Rules and relevant visa route guidance. If the DM is not satisfied that the genuineness requirements are met, or considers that specific factors warrant further explanation, they may request an interview with the applicant.
- 6.47** For Work and Student visas, DMs may also request an interview with the sponsor. For example, a DM may want to confirm the duration of a course of study. Where a Visit visa applicant has a UK sponsor, the DM may wish to confirm the length of time the sponsor is expecting the applicant to stay, what the applicant intends to do while in the UK, where they will live and how they maintain themselves financially.
- 6.48** Brief calls to an applicant or sponsor to verify details in the application form are considered part of general enrichment activity. More thorough interviews with either or both may be requested where the DM considers there may be a risk of overstaying or some other form of visa abuse.

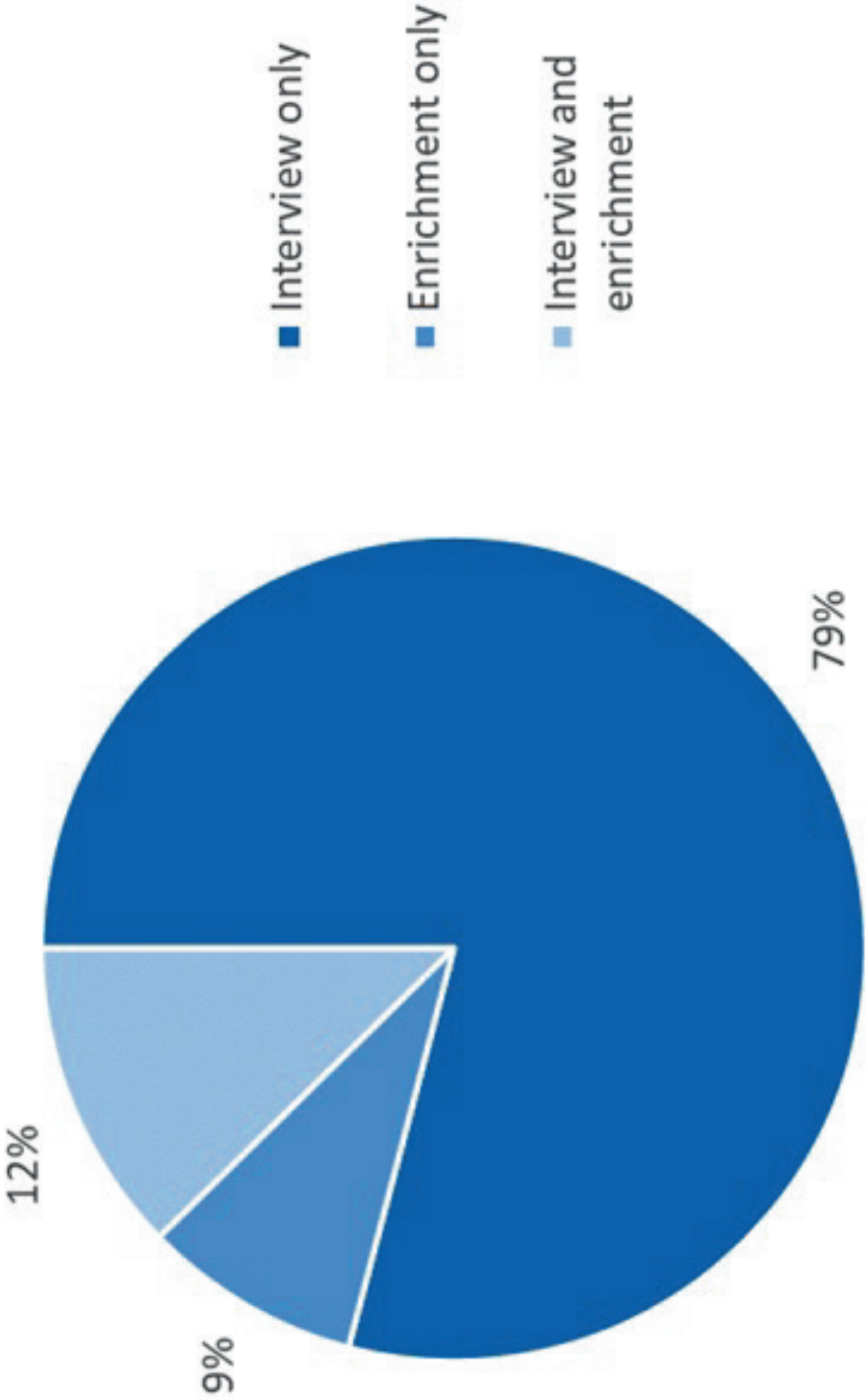
- 6.49** Within the Visit visa service line, DMs were able to exercise their own judgement whether to refer an application for interview, or some other form of enrichment. Since personal preference played a part, there was a risk of inconsistency in the way applications were treated. A senior manager in the Visit service line told inspectors that interviewing had reduced over the past few years, but they were putting processes and resources in place, including a contract for translation services, to reverse this trend.
- 6.50** Work and Student visa DMs had to seek approval for an interview of an applicant or sponsor from an HEO entry clearance manager, and there was a specialist interview team that conducted interviews for these routes. Work visa DMs told inspectors that they referred cases that may require enrichment checks to the Enrichment team, who decided whether the checks were necessary. Student visa DMs said that they had to refer cases requiring enrichment checks to an HEO for approval.

Scale of enrichment activity

- 6.51** Between 1 January 2024 and 30 June 2025, the Home Office received 87,837 Temporary Worker visa applications. Of these 5,922 (6.7%) were sent for enrichment. Of those sent for enrichment, 4,685 (79%) were for interview only, 730 (12%)

were for an interview and enrichment checks, and 507 (9%) were for enrichment checks only. See Figure 6.

**Figure 6: Enrichment activity for Temporary Worker applications
(1 January 2024 to 30 June 2025)**



6.52 Of the 5,415 applications which were allocated for interview, 208 (3.8%) applications were withdrawn, 1,619 (29.9%) visas were issued, and 3,588 (66.3%) were refused. See Figure 7.

Figure 7: Number of Temporary Worker visa applications allocated for interview (1 January 2024 to 30 June 2025)

Temporary Worker route	Allocated for interview	Withdrawn	Issued	Refused
Creative	3,583	190	1,027	2,366
Charity	1,363	13	392	958
Religious	456	1	195	260
International Agreement	11	4	3	4
Seasonal Worker	2	0	2	0

6.53 The data indicated significant disparities in the way the Home Office approached the different categories of Temporary Workers. Between 1 January 2024 and 30 June 2025, the Home Office processed 65,461 Seasonal Worker visa applications, yet only two Seasonal Worker visa applicants were interviewed (both of whom were issued with visas). A further 12 Seasonal Worker visa applications were subject to enrichment checks (six were refused and six issued).

6.54 DMs told inspectors that Creative Workers were often interviewed because “they have to reach a

very high level of credibility”, whereas they would be unlikely to suggest an interview for a seasonal worker, as there is no “genuineness criteria” that applicants have to meet. Furthermore, it was difficult to refuse a Seasonal Worker application if there was a Certificate of Sponsorship from an approved sponsor, which met other relevant criteria (such as the age of the applicant and date of application).

- 6.55** The lack of “genuineness criteria” meant a Seasonal Worker application could not be refused on credibility grounds, even if the individual had previously overstayed in the UK, unless a re-entry ban was in place. However, where relevant, applicants could be refused on suitability grounds under part 9 of the Immigration Rules.³⁸
- 6.56** A manager told inspectors that when the Home Office introduced the Seasonal Worker route it was mainly accessed by Ukrainian workers, who were largely compliant with the Immigration Rules. Since the war in Ukraine began, other nationalities

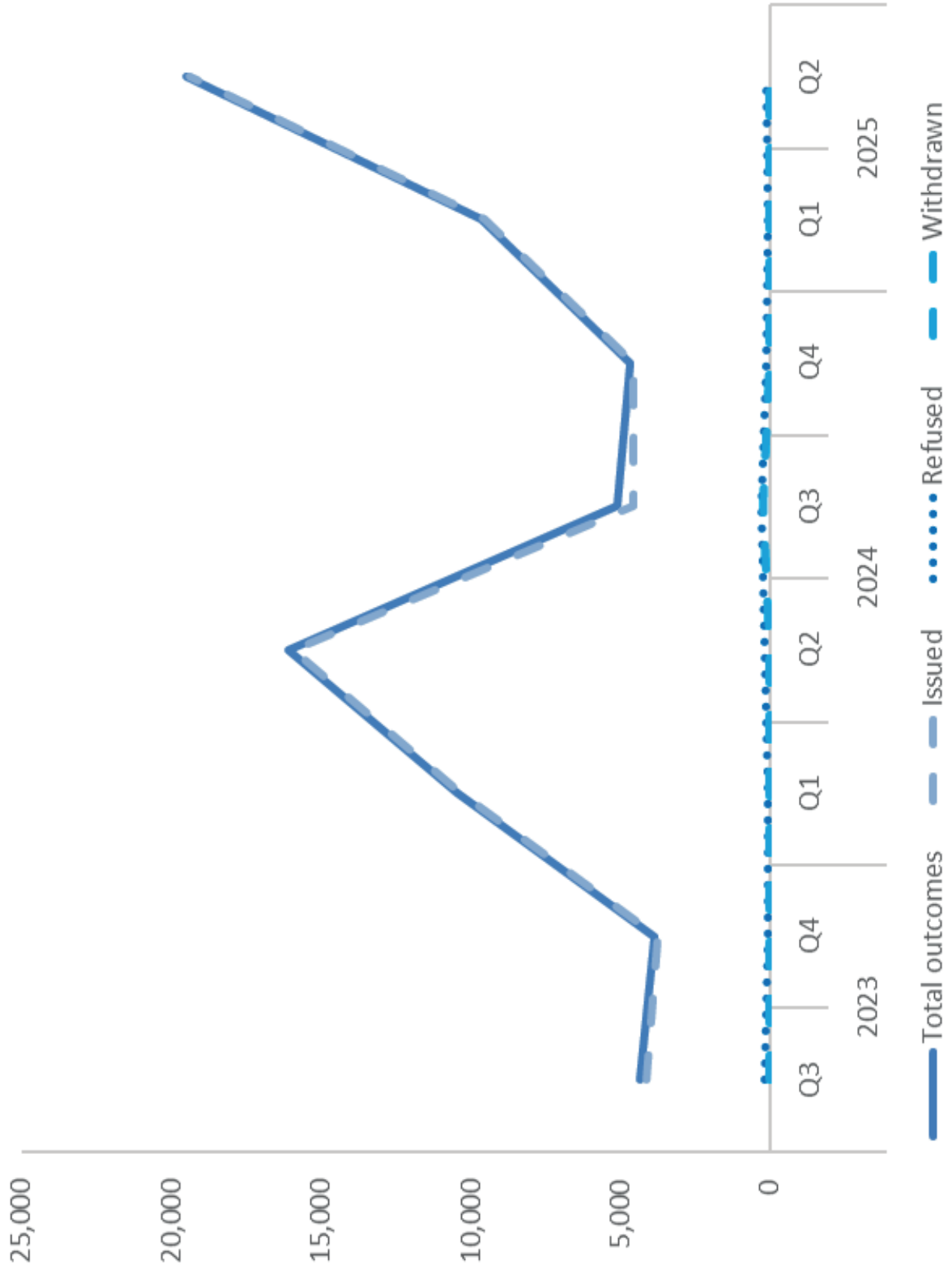
38 Home Office, ‘Immigration Rules’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules>

had started to use this visa route and overall compliance had decreased.³⁹

6.57 As Figure 8 shows, almost all Seasonal Worker visa applications processed between Q3 of 2023 and Q2 of 2025 were issued.

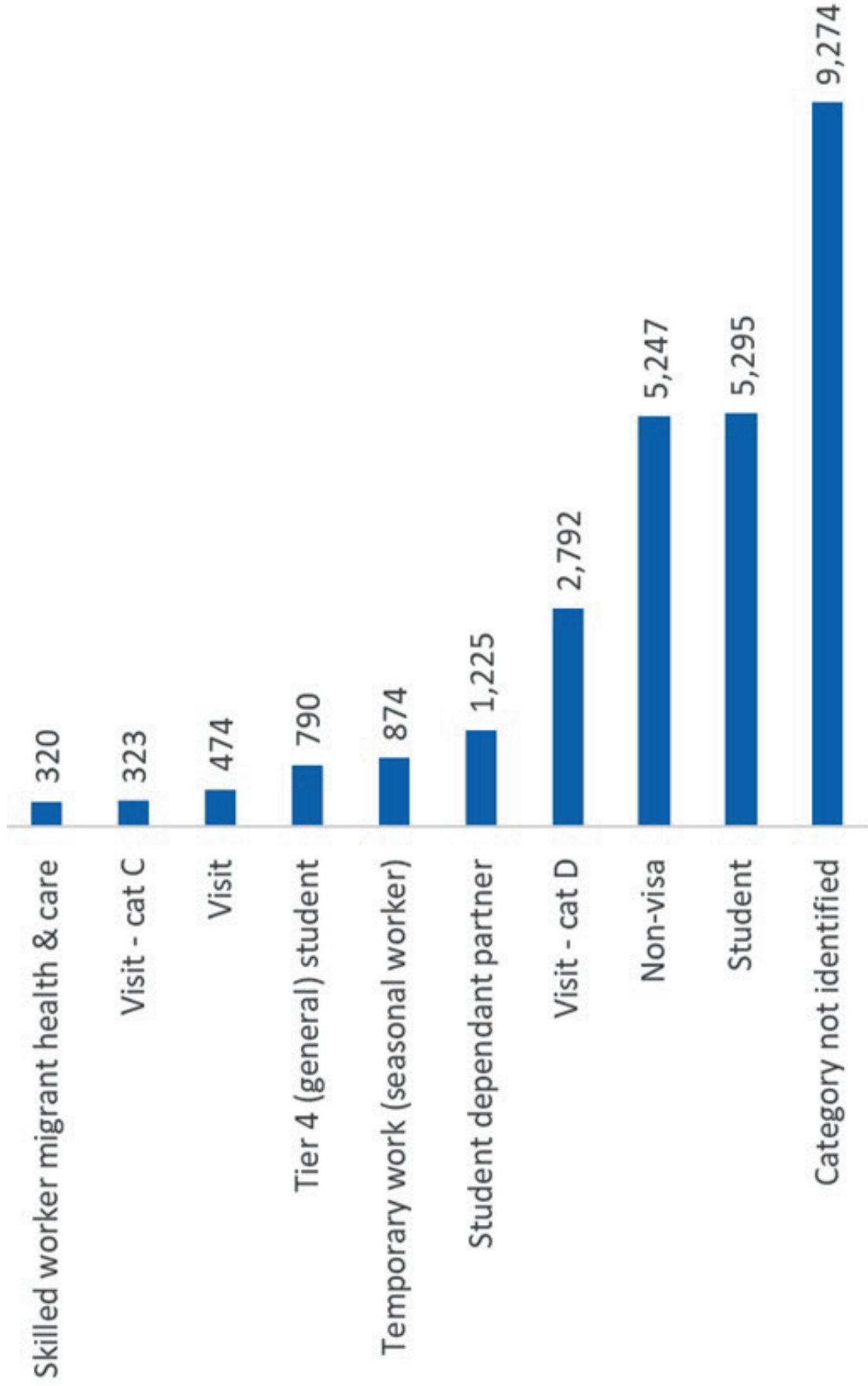
39 In its factual accuracy response the Home Office stated: “This may have been true immediately after the Russian invasion of the Ukraine and certain providers drove non-compliance in the route, however since we have taken revocation action against 2 of the main providers and action planned another, the harm data relating to Seasonal Work has reduced significantly, meaning this statement is conjecture rather than fact.”

Figure 8: Outcomes for Seasonal Worker visas (Q3 of 2023 to Q2 of 2025)



6.58 Between 1 March 2024 and 8 April 2025, 874 seasonal workers were served with a Notice of Liability to Remove (NOL) letter as overstayers, making this the fifth highest category of overstayers served with a NOL, where a visa category was identified. However, in the case of 9,274 overstayers served with a NOL, the Home Office did not record a category, undermining the reliability and usefulness of any analysis. See Figure 9.

Figure 9: Top ten leave types on arrival for individuals served with a NOL as an overstay (1 March 2024 to 8 April 2025)



- 6.59** A senior manager told inspectors: “In a perfect world we would frankly advise not to have a low skilled route, but it is our job to manage it.” To manage the risk of overstaying and other immigration abuse on the Seasonal Worker route, VSI explained that they focused on sponsor compliance, rather than on the applicants themselves.
- 6.60** DMs told inspectors that, although some Sponsored Student visa applicants are invited for interview, STS applicants are never interviewed as they all say they want to come to the UK to study English, and the questions Home Office staff could ask would be of limited value in decision making. A senior manager suggested that DMs should be able to assess an STS visa applicant’s credibility without the need for an interview. Where further information was required to make a decision, the DM would normally write to the applicant and request that the information be sent via by email.

‘Genuineness criteria’ in Short-term Student cases

- 6.61** STS students are required to leave the UK within 30 days following the completion of their course or after 11 months (whichever is the sooner), but a manager said that the Home Office was not particularly concerned about them simply overstaying: “All our focus is on the risk of an

asylum claim, which covers overstaying, so overstaying is not really at the forefront of our thinking.”

6.62 Between 2024 and 2025, the Study service line saw a large increase in the number of STS applications. Many of these applications were found to be of poor quality, pointing to abuse of the route and leading to an increase in refusal rates. VSI managers identified this trend and worked with policy and guidance colleagues to tighten the STS “genuineness criteria” in the Immigration Rules.

6.63 On 9 April 2025, the Immigration Rules were amended to include the following “genuineness criteria”:

“STS 5.1. The applicant must satisfy the DM that they are a genuine Short-term Student, which means they:

- (a) are genuinely seeking entry for the purpose of undertaking the course of study for which they have demonstrated they have been accepted onto in STS 4.2; and
- (b) will not study in the UK other than for the course of study for which they have demonstrated they have been accepted onto in STS 4.2; and
- (c) will not study at an academy or state-funded school; and

- (d) will leave the UK within 30 days of the end of their English language course, or at the end of 11 months, whichever is sooner; and
- (e) will not make the UK their main home; and
- (f) will not work in the UK; and
- (g) will not engage in any business or professional activities in the UK; and
- (h) have relied upon funds to meet the Financial Requirement in STS 6.1 to STS 6.4 which are genuinely available to them for the purposes of undertaking the course of study for which they have demonstrated they have been accepted onto in STS 4.2.”⁴⁰

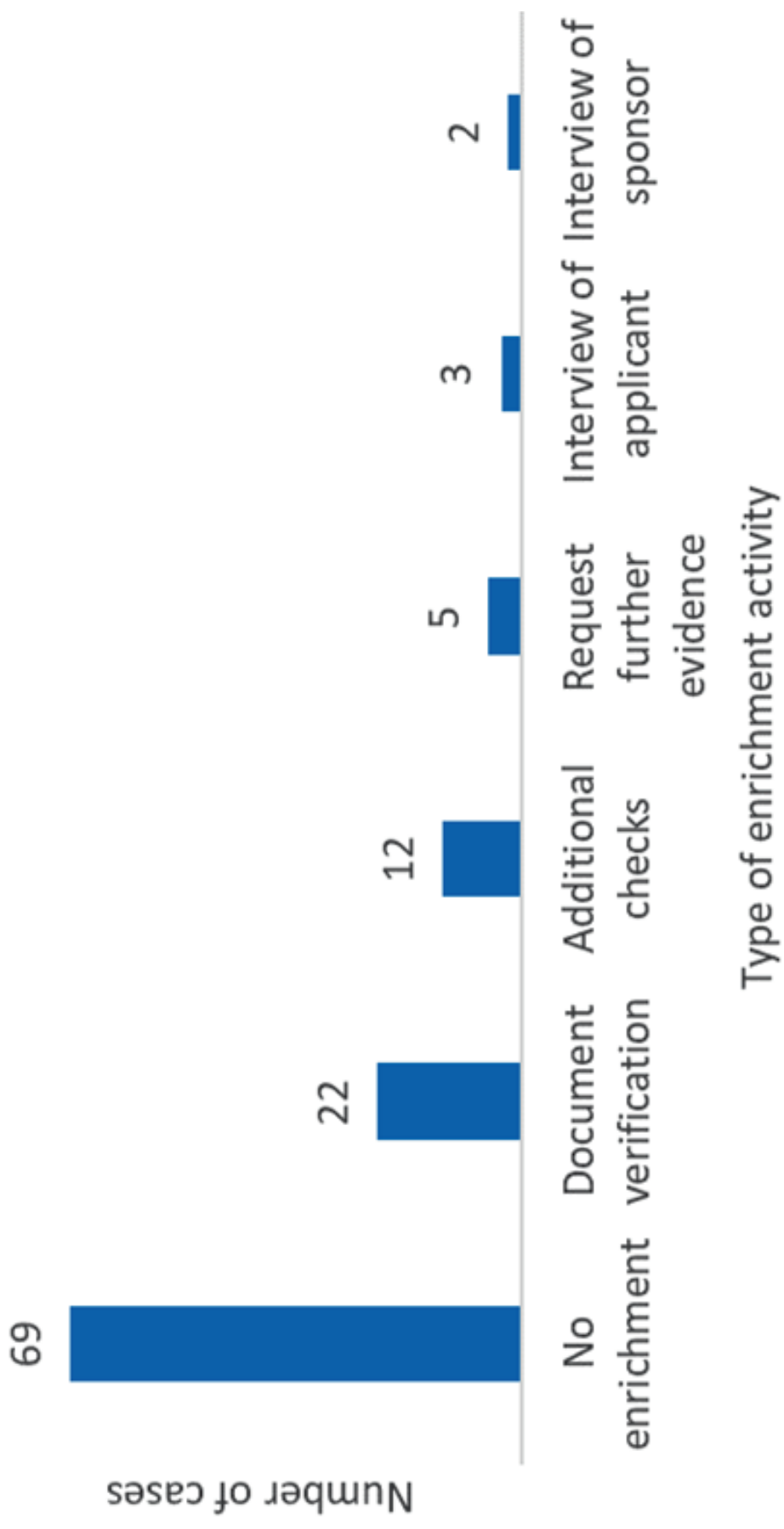
6.64 Staff from VSI and the Casework Intelligence team agreed that the Rule change had improved the ease of decision making. Previously, it was challenging to refuse applications where visa abuse was suspected but the applicant had not included any fraudulent information, particularly as STS applicants did not require a sponsor. The introduction of “the genuineness rule” simplified the refusal process for cases where potential non-

40 Home Office, ‘Immigration Rules Appendix Short-term Student’ (published 25 February 2016, last updated 13 August 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-short-term-student-english-language>

compliance such as overstaying was suspected, thanks to its clearer and more direct wording.

6.65 Of the sample of 100 overstayer cases examined by inspectors, 69 had no enrichment activity. Of those that did, 22 had been subject to document verification checks, 12 to additional checks, five to further evidence requests, three to an interview of the applicant, and two to a sponsor interview. Eleven cases had been subject to more than one type of enrichment. See Figure 10.

Figure 10: Enrichment activity conducted in sampled overstayer records



Complexity Application Routing Solution

- 6.66** The Complexity Application Routing Solution (CARS) is used to route Visit and some Student visa applications automatically as either ‘non-complex’ or ‘complex’, and to suggest enrichment options for complex cases. The Home Office told inspectors that routing of cases helps to make the most efficient use of resources. On most routes, non-complex applications are routed to AOs for consideration, whereas complex applications are routed to EOs.
- 6.67** CARS looks at person-centric attributes. Profiles are based on two main datasets: asylum claims linked to previously issued visas; and refusals under the Immigration Rules part 9.7.1 (making false representations or submitting false documents).⁴¹ The risk of overstaying is not included in profile development because the data is not considered reliable enough.
- 6.68** The Home Office provided inspectors with copies of current risk profiles, each of which included a clear rationale and justification for the profile and

41 Home Office, ‘Immigration Rules part 9: grounds for refusal’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-part-9-grounds-for-refusal>

a detailed equality impact assessment. Inspectors were told that risk profiles are authorised by a VSI Senior Civil Servant. New profiles are reviewed after a maximum of six months, and thereafter every 12 months if no changes have been made. However, they can be reviewed more frequently if necessary, for example, where new demographic trends are identified. A senior manager told inspectors that there were over 200 risk profiles for the Visit service line and between 50 to 70 profiles for long-term Sponsored Students. CARS is not used on STS applications.

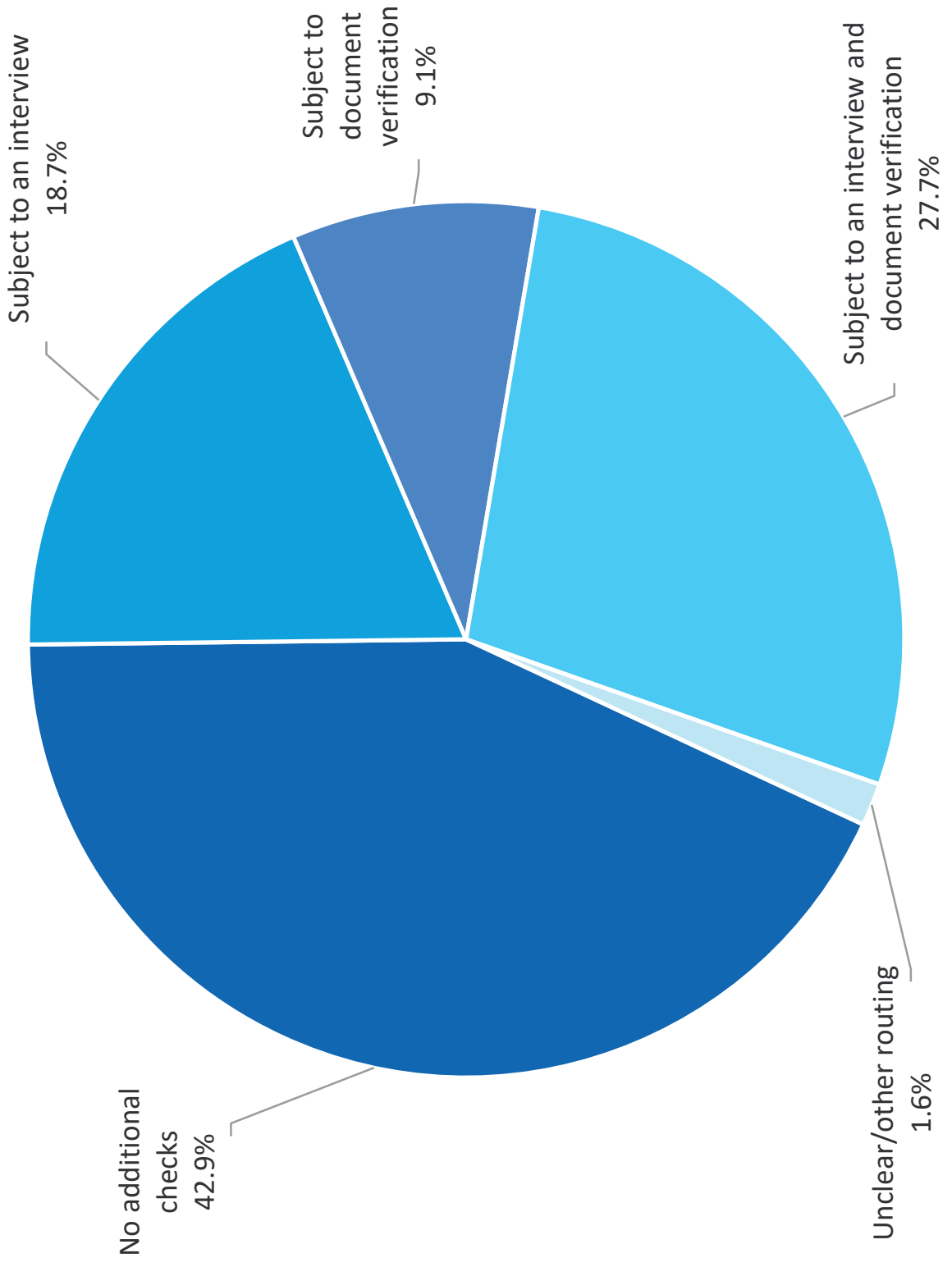
- 6.69** CARS identifies whether there is an adverse match on VIMA and automatically checks passport details against the Initial Status Analysis dataset, which should include an individual's previous UK travel history and can indicate whether someone may have overstayed their visa. A biographic match on Helios/BX Tools, a biometric match to IDENT1 or IDENT SC, or an admission by the applicant of an adverse immigration history, including overstaying, should result in the application being routed as complex.
- 6.70** Staff at all grades told inspectors that CARS was particularly useful for routing cases, but once routed each application was considered individually. A senior manager stated: "CARS is just an indicator, but all applications need to be assessed on their merit." Applications routed as

non-complex should be subject to enrichment checks where the DM considers this is necessary.

- 6.71** Between 1 January 2024 and 30 June 2025, the Home Office received a total of 4,229,875 Visit visa applications. Of these, 896,185 (21.2%) were routed as complex by CARS.⁴²
- 6.72** At the time of this inspection, in June 2025, CARS was not used for Work visa applications. Inspectors were told that use of CARS on the Work visa service line was being considered. If agreed, the Central Risk Team will write the risk profiles in conjunction with the Work Risk Hub.
- 6.73** Between 1 March 2024 and 10 April 2025, 29,402 Sponsored Student visa applications were routed as complex by CARS. Figure 11 shows that in 12,603 cases (42.9%), no additional enrichment checks or interviews were conducted. A further 5,511 (18.7%) cases were allocated for interview, 2,677 (9.1%) cases underwent document verification, and 8,150 (27.7%) cases were allocated for both an interview and document verification checks.

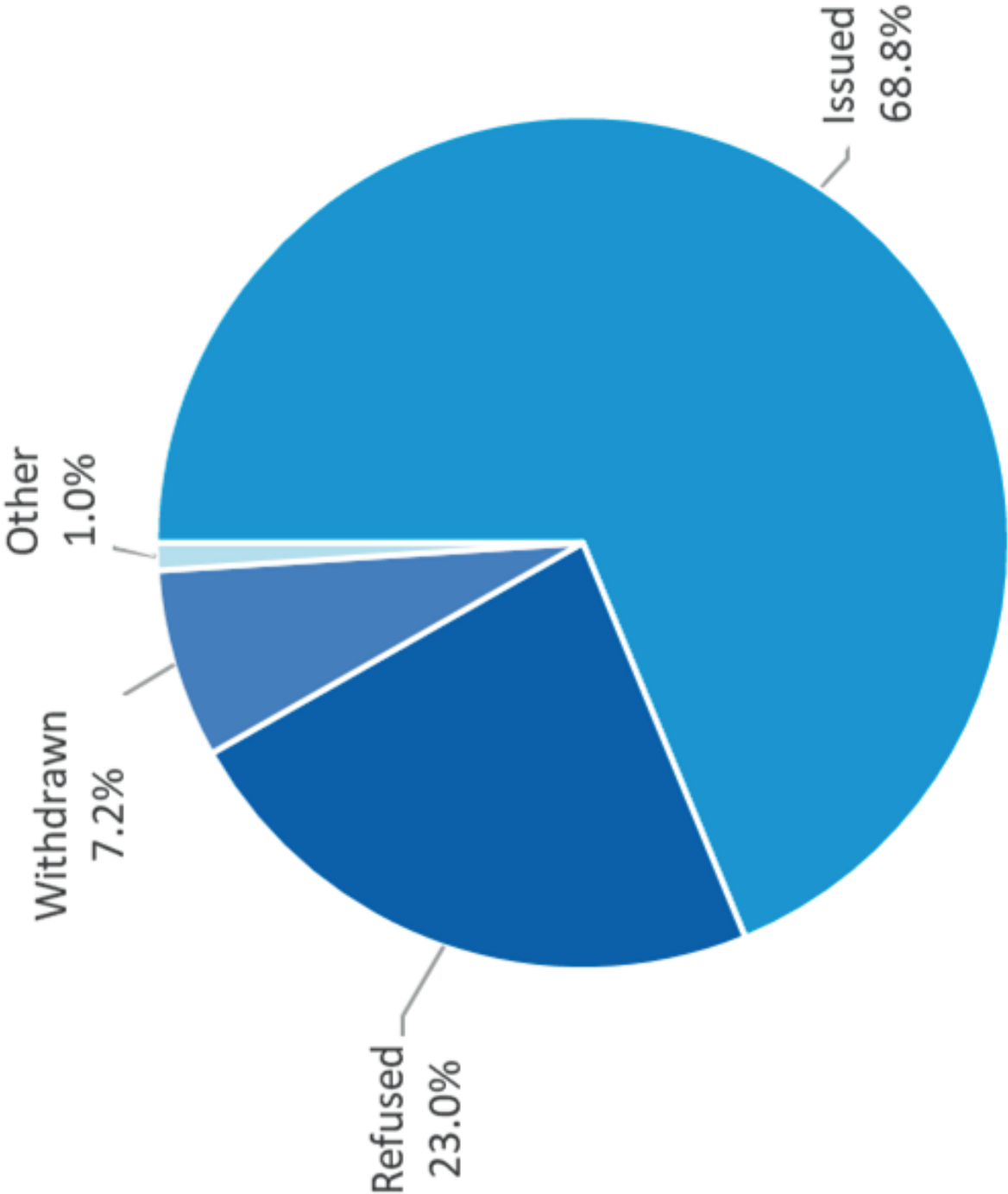
42 Home Office, 'Migration transparency data' (updated 1 September 2025). <https://www.gov.uk/government/statistical-data-sets/migration-transparency-data>

Figure 11: Actions after a Sponsored Student visa application is routed as complex via CARS and sent to an EO decision maker (1 March 2024 to 10 April 2025)



6.74 Of the 29,402 Sponsored Student visa applications routed complex, 20,224 (68.8%) were issued, 6,763 (23%) were refused, and 2,109 (7.2%) were recorded as withdrawn. See Figure 12.

Figure 12: Outcomes of Sponsored Student applications routed as complex (1 March 2024 to 10 April 2025)



Benchmarks

6.75 Daily benchmarks for DMs are based on the assessed complexity levels associated with each visa route. Applications considered less complex have higher daily benchmarks for the number of applications that DMs are expected to decide.

Visit visas

6.76 At the time of the inspection, Visit visas were divided into three 'pots', comprising different groups of countries. DMs worked on these pots in rotation, spending five to six weeks on one pot before moving on to another. Each pot contained both complex and non-complex applications, and each had its own benchmark for both. Across the three pots, DMs were expected to complete between 22 and 35 decisions for complex cases and between 35 and 80 decisions for non-complex cases.

6.77 DMs told inspectors they found the benchmark achievable in one pot, but more difficult in the others as these contained applications from countries with higher levels of risk. One DM told inspectors: "I am fighting for my life [when I work on this pot]."

Work visas

6.78 EO DMs working on complex Temporary Worker and Seasonal Worker applications had

a benchmark of 20 decisions a day, which they told inspectors was difficult to achieve. AO DMs working on non-complex applications had a benchmark of 50 decisions for Temporary Worker and 70 for Seasonal Worker applications. They said that this benchmark was normally achievable as they mainly deal with simple cases.

Student visas

- 6.79** All STS visa applications are classed as complex and allocated to EOs to decide. Their daily benchmark is 18 decisions.
- 6.80** EO DMs working on non-STs Student visas told inspectors that they were required to make 25 decisions a day, while AOs had a benchmark of between 45 and 60 decisions per day depending on the type of applications they were dealing with.
- 6.81** Student visa applications spiked between July and September each year, and again in December to January, as students prepared to start new courses. However, VSI confirmed that the benchmarks were fixed for the year and did not change during periods of increased application volumes.
- 6.82** Staff commented that it was easier for experienced DMs to meet the benchmarks, due to their familiarity with the documents, but some applications could contain a lot of evidence and could take up to 90 minutes to process. Inspectors

were told that, “realistically it is not possible to read all the documentation and still meet the targets.”

- 6.83** Some AO DMs said that, while their immediate line managers understood that it was not always possible and were supportive, they felt that senior managers expected them to issue all non-complex applications. However, among the non-complex cases, AO DMs identified cases that needed closer scrutiny and had to be transferred to EO DMs for consideration of enrichment activity and potential refusal.
- 6.84** Some AO DMs told inspectors they felt that when they did meet the benchmarks, the quality of their work suffered. A Student visa manager said that all staff working on the Study service line were under pressure and that: “Study is a place where it is quantity rather than quality focused. We work hard on quality, but the expectations are high.” The manager confirmed that there had been discussions with senior managers about finding a better balance between quantity and quality, but there was no indication that anything would change.
- 6.85** A senior manager acknowledged, “we maybe have a reputation for quantity over quality. I am aware that there is a problem.” To mitigate this risk, the team had been restructured and assurance processes had been put in place, including feeding back details of applicants who had been issued

with Student visas and then claimed asylum once in the UK.

Quantity versus quality

- 6.86** As well as with Student visas, the balance between quantity and quality was a recurring theme with Visit and Work visas. A member of staff concerned with Visit visas described it as a “seesaw”, where the focus would shift to quality if there had been a lot of bad decisions, but during a surge in applications the focus would be on quantity. A senior manager told inspectors that applicants pay high application fees with the expectation that they will get a timely decision, in line with published service levels. For example, a Standard Visit visa costs £127 for a visit of up to six months and, according to GOV.UK, applicants could expect to receive a decision “within three weeks”.⁴³
- 6.87** Some Work visa DMs told inspectors that pressure to achieve benchmarks meant that enrichment checks and interviews were not always conducted when they should be, as it was quicker and easier to issue the visa. Applications that were deferred for enrichment did not count towards their daily decision-making statistics.

43 GOV.UK, ‘Visit the UK as a Standard Visitor’. <https://www.gov.uk/standard-visitor>

Guidance

- 6.88** The Home Office provided evidence that up-to-date guidance for the Visit, Study and Work service lines was available for all staff. DMs confirmed that they had online access to all necessary guidance and process documents via SharePoint, as well as to all required IT systems. DMs also spoke positively about ‘town hall’ meetings held at regular intervals, where useful information was shared.
- 6.89** Additionally, there are systems in place to provide information on current trends or warning indicators, through various updates, bulletins, and briefings. For example, the Casework Intelligence team publishes ‘newsflashes’ highlighting a particular trend, such as a fraudulent document being used by applicants.
- 6.90** Although DMs received regular updates via email, they acknowledged that it was easy to overlook information delivered in this way, and it was not always clear whether the content remained relevant or reflected ongoing concerns.
- 6.91** Most visa applications are now processed in the UK rather than in the country where the applicant resides. Inevitably, DMs now have less first-hand local knowledge. To mitigate this, DMs can access country briefings on SharePoint. A manager in the Visit service line gave the example of how ‘country

information’, including information such as typical local earnings, had been produced for Turkey to help UK-based DMs who were taking over responsibility for Turkish Visit visas. Inspectors were told that there were also ‘country leads’ who hosted Microsoft Teams chats for DMs dealing with ‘high-risk’ countries and provided live country updates, for example, to highlight political changes or earthquakes.

Training

- 6.92** The Home Office recognised that “Training and awareness programs [sic] are integral to the effective management of overstayers.” The Home Office told inspectors that specific briefings and training packages are provided to staff regarding overstayers and refusals under part 9 of the Immigration Rules.
- 6.93** Although training varies for Visit, Work and Student DMs (see Figure 13), all DMs are taught the importance of conducting thorough assessments and using available data to identify and manage overstayers. A senior manager told inspectors that ensuring staff are aware of the overstayers strategy “comes down to training”.

Figure 13: Training for DMs on Visit, Temporary Worker and Short-term Students routes

Visa route	Grade	Duration of course
Visit	EO	12 days
	AO	5 days
Temporary Worker	EO	1 hour per route (following training in Unskilled workers)
	AO	1 hour per route (following training in Skilled workers)
Short-term Student	EO	1-day module of a week-long course

- 6.94** DMs told inspectors that the quality of their training was generally good, though some described their initial training as “overwhelming” and the new IT systems as “daunting.” DMs found the periods of shadowing and mentoring particularly useful as it gave them practical experience of dealing with applications and using the Proviso system. However, they would have liked to have had access to a training environment on the Proviso system during their initial course to improve their understanding of how it worked.
- 6.95** During the mentoring period, a ‘learning log’ records a trainee’s progress. DMs are ‘signed off’ as competent only once their work has reached the required standard.

Visit visas

- 6.96** For Visit visas, the Decision Maker Foundation Course lasts 12 days for EO DMs. A shorter five-day course is provided for AO DMs who only deal with non-complex cases. The courses consist of classroom-based guided learning and working through examples of applications. This is followed by a period of mentoring, which normally lasts two weeks.
- 6.97** Some managers working in the Visit service line told inspectors that there was a lack of training for EO DMs on writing refusal letters, and on quality assuring refusal letters for the HEO role. Inspectors were told that managers in Sheffield had tried to address this by creating their own refusal workshops.

Work visas

- 6.98** Work visa EO DMs told inspectors that they were initially trained on the Unskilled Workers route, before moving on to Temporary Workers. Training for the Temporary Worker routes lasts approximately one hour for each individual route, and it normally takes a full day to cover all temporary routes. AO DMs said that they had been trained on the Skilled Workers route and then trained on the specific route for which they were making decisions. Following formal training, DMs receive mentoring which normally lasts one

week, with mentors supporting and completing assurance checks on all applications assessed by their mentee.

6.99 DMs considered the training they received to be of a generally good quality, and the period of mentoring afterwards was widely regarded as helpful.

Student visas

6.100 A manager told inspectors that a lot of work had been done to boost the quality and quantity of Student visa decisions, and that “all those changes start with the training and onboarding.”

6.101 For most Student visa routes, non-complex applications are decided by AOs. AO DMs told inspectors that they had attended an induction day, followed by a week of training, which was delivered virtually, over Microsoft Teams.

6.102 EO DMs are responsible for decision making on complex Student visas and STS applications. The STS visas training pack is presented in a single day and can be delivered during the Student visa training course or as a standalone module.

6.103 EO DMs undergo a period of mentoring after the Student visa training course, during which they work on all types of Student visa case types until they are signed off as ‘competent’. Mentoring normally lasts four weeks.

- 6.104** In addition, the Student Entry Clearance Training team has created modular training packages, including confirmation bias and Equality Act training, to refresh DMs' awareness of equality discrimination legislation, and fraud awareness training to aid the identification of fraudulent documents and harm indicators.
- 6.105** DMs who are returning to Student visas from other business areas are required to complete a refresher training course, which is a more streamlined version of initial training. Returning DMs who think they require further support are encouraged to raise this with their manager.
- 6.106** The refresher training course includes a presentation and test on the Operating Mandate, which is also part of the initial training course,⁴⁴ as all Student visa DMs must complete this every 12 months.

Quality assurance processes and feedback for decision makers

- 6.107** In August 2024, Customer Service Group (CSG) produced an updated version of its Quality Assurance Strategy, which covers the work of all CSG business areas including visa decision making. The strategy allows business areas to set

44 The Operating Mandate specifies which checks must be conducted for each visa application.

their quality assurance frameworks and assurance checks according to risk. Consequently these are not exactly the same for the Visit, Work and Student visa routes. The overall levels of quality assurance checking for the different visa routes may also be varied during peak periods. First-line assurance on visa decision making is conducted by HEO entry clearance managers (ECMs).

- 6.108** Of the sample of 100 overstayer cases examined by inspectors, five had CRS records indicating that a quality assurance check had been conducted. In two cases, the original decision to refuse the visa had been overturned by an ECM, operating as first-line assurance.
- 6.109** The Visit, Work and Student visa service lines use a quality assurance review tool called Vista. Vista uses marking standards specific to each service line, but the decision quality (DQ) outcome is measured in a consistent way for all three: “DQ1 for a correct decision; DQ2 for minor errors; DQ3 for significant errors; and DQ4 or DQ5 for fail errors [such as an incorrect decision or the issue of an incorrect type of visa]”.
- 6.110** In April 2025, inspectors were told that ‘DQ’ scores were in the process of being renamed ‘QS’ (standing for quality scores) across all routes, but the numbering and definition would remain unchanged.

- 6.111** The Home Office told inspectors that management information (MI) from Vista provides line managers with a clear indication of what support their staff require, and it permits them to monitor errors and see where further support is needed.
- 6.112** For individual DMs, the level of checking depends on their experience and performance. New DMs on all routes are subject to 100% quality assurance checks. The results are recorded on Vista, and DMs must reach a certain number of ‘correct cases’ to be ‘signed off’ as fully competent, when the level of checking is reduced. The number of correct cases a DM is required to achieve to be signed off differs for the different visa routes. For example, DMs assessing Seasonal Worker applications are normally signed off after they have achieved five consecutive correct cases. However, on other Temporary Worker routes the requirement is ten consecutive correct cases. After having been signed off, if a DM is not performing to the required standard, 100% checks can be resumed.
- 6.113** DMs confirmed that they received constructive feedback on their decisions by email, and considered the approach and language used to be “supportive”. DMs explained they were not normally informed when an individual whose application they had assessed subsequently

overstayed, but they thought such feedback would be useful.

Visit visas

- 6.114** For non-complex Visit visa applications, for one day a month at least 25% of a signed-off DM's decisions are quality assured. For complex applications, at least 50% of a DM's decisions on a given day each month are quality assured. Issues made on suitability grounds are subject to 100% checks, as are high-profile and 'Super Priority' applications (for which applicants pay extra).
- 6.115** The Quality Sampling Mentoring team⁴⁵ also conducts random dip sampling of decisions based on any trends that have been identified during the previous week. The Quality Sampling Mentoring team focuses on any additional learning needs the DMs may have.
- 6.116** In June 2025, the Home Office told inspectors that the Improvement in Decision-Making, Engagement and Action (IDEA) team was being created for Visits, International and electronic travel authorisations. The aim was to reduce immigration harm on the Visit visa service line through

45 The Quality Sampling Mentoring team within the Visit visa service line focuses on areas where DMs may require additional support, based on information from the Harm and Enrichment team.

improved decision quality, training and guidance, increased professionalism, and standardisation across decision-making centres, and integration of electronic travel authorisations.

Work visas

6.117 Managers told inspectors that, in addition to the 100% checking of DMs who were not yet signed off, a randomly selected sample of 2% of Work visa application decisions are quality assured. Scores are examined monthly, and feedback is provided to DMs via their line managers. If a training need is identified, the DM is given tailored support.

Student visas

6.118 An ECM reviews all Student visa refusals. In addition, a dip sample of at least three decisions a month from each DM is quality assured. Furthermore, 'assurance ambassadors' create a fortnightly update that is circulated to all Student service line colleagues highlighting MI findings from the Vista tool. These updates include the total number of errors and current trends, and identify

where improvements can be made to reduce future errors.⁴⁶

Administrative reviews

- 6.119** In the case of some visa routes, an applicant who believes that the Home Office made a caseworking error when deciding their visa application can apply for an administrative review. Concurrently with this inspection of overstayers, the ICIBI was conducting an inspection of the Home Office's Administrative Review system. At the time of writing, that inspection is still ongoing.
- 6.120** Evidence provided to the ICIBI indicated that between 1 January 2024 and 30 June 2025, 4,229 refusals of visa applications from individuals who had applied from outside the UK were overturned following an administrative review. Of these, 391 were STS refusals.
- 6.121** A senior manager told inspectors that, where STS refusal decisions had been overturned and visas issued, a "very high percentage" of the visa holders subsequently claimed asylum in the UK. A

46 In its factual accuracy response, the Home Office stated: "Correct as of the time the inspection was conducted. However, this has now changed as per the "Review to Risk" process meaning not all refusals need ECM review, with some issued cases now subject to review."

Study service line manager said that, as a result, they had worked with the Administrative Review team to ensure that their refusals were correct and robust, and to improve the STS assurance framework.

Feedback loops and engagement

Internal feedback loops

- 6.122** Operational Review Meetings are held regularly across VSI to provide an opportunity for engagement and knowledge-sharing. Some of the meetings are specific to a decision-making centre or visa service line, while others, chaired by the Central Risk team, focus on nationalities that pose a high risk of immigration abuse. Operational Review Meetings are held regularly on a monthly or bi-monthly basis, though may be rescheduled depending on staff availability, necessity, and other work priorities. Minutes from the meetings are forwarded to the Central Services team (Cross-Cutting Service Operations) each month.
- 6.123** The Home Office provided inspectors with examples of the meeting minutes. These noted discussions about trends, such as asylum claims and forged documents, but there were few specific references to overstayers.
- 6.124** Monthly harm reduction calls are conducted across service lines, involving representatives

from Visit, Work and Student visa operations. According to the Home Office, these cross-cutting discussions have proven valuable for sharing information and detecting patterns of behaviour. As an example, they enabled teams to identify that a reduction in Visit visa applications from one country coincided with an increase in Seasonal Worker applications from the same country. Such trends could indicate that certain visa routes are perceived as easier to access, leading to abuse of the route. Harm and risk teams support DMs to identify routes or application types which may require additional scrutiny through interview or enrichment checks.

- 6.125** DMs praised the work of the risk teams, particularly the Work Risk Hub, in identifying issues and trends, and providing them with valuable advice and briefings on potential risks and recommended actions. One DM said: “The risk hub is amazing. Having the signposts and the monthly briefings is really helpful.”
- 6.126** In the Student visa service line, Home Office ‘Operational Instruction 1404: New CARS(S) workflow routing solution and guidance for Student applications Aug-23’ states that Operational Review Meetings must be conducted with Home Office International Operations for overseas visa applications to ensure that enrichment is focused and making best use of resources, that risk

profiles remain accurate and valid, and that there are no unintended discriminatory consequences (or that these can be justified as proportionate and legitimate).

Intelligence sharing to assist decision making

- 6.127** The VSI Central Risk team and Risk and Harm teams across the visa service lines receive weekly reports from the Immigration and Asylum Biometric System (IABS), which include details of asylum seekers who initially entered the UK with a visa. This information is collected when individuals claiming asylum provide their fingerprints and biometric data, which are then matched against Home Office records. Although IABS reports do not explicitly identify overstayers, individuals who have been served with a Notice of Liability to Remove as an overstayer, either prior to or after making an asylum claim, are included.
- 6.128** VSI also receives daily updates on asylum cases on the CRS Post Dashboard. While other types of harm, such as overstaying or illegal working, may also be included, cases usually involve an asylum claim.
- 6.129** The relevant visa service line Harm team reviews the cases highlighted in the IABS reports and CRS Dashboard to identify whether any errors were made during the visa decision-making process. They also look at whether the DM made

an appropriate decision based on the information available at the time. If errors or areas for improvement are identified, these are fed back to the DM by email. Details of the case are added to the decision quality log on the Vista tool for managers to assess and discuss with DMs in their one-to-one line management discussions.

- 6.130** Inspectors found that there were gaps in the IABS and CRS dashboard feedback loop, as not all relevant CRS records are updated with details of asylum claimants. Additionally, there is no mechanism to ensure that all individuals served with a Notice of Liability to Remove as an overstayer are referred to VSI.
- 6.131** A VSI senior manager told inspectors that, while it is easy to identify an asylum claimant because their claim is recorded, there is no tool to easily identify overstaying. They said that if a visa holder claims asylum within 12 months of the visa being issued, VSI assumes that they never intended to comply with their visa. The manager also told inspectors that the number of visa national overstayers who did not claim asylum was so small that the lack of this data did not have a significant impact on visa decision making.
- 6.132** While the Casework Intelligence team within Home Office Intelligence focuses on the abuse of legal routes, Casework Intelligence staff told inspectors that there was no specific focus on overstaying as

it is considered to be “opportunistic” rather than organised activity. However, the team provides ‘newsflashes’ to update DMs in VSI on trends or documents they need to be aware of.

6.133 In accordance with Home Office guidance, Immigration Enforcement, Common Travel Area Liaison Officers, and the Causeway Multi-Agency Hub⁴⁷ must record any instances where visa holders (who may have overstayed) are found leaving the UK concealed in a vehicle bound for the Common Travel Area⁴⁸ or the Schengen Area.

47 The Causeway Multi-Agency Hub is an intelligence unit comprised of staff from various agencies including Immigration Enforcement, Border Force, the National Crime Agency, Humberside Police, Kent Police, Essex Police, Counter Terrorism Border Police, HM Revenue and Customs, Department for Work and Pensions, and Driver and Vehicle Standards Agency.

48 “The CTA [Common Travel Area] is an administrative arrangement between the UK, Ireland and the Crown Dependencies (Isle of Man, Guernsey, and Jersey) which is implemented in UK domestic law in statute. Under the CTA, British and Irish citizens can move freely and reside in either jurisdiction.” UK Visas and Immigration, ‘Common travel area’ (updated 17 September 2025). <https://www.gov.uk/government/publications/common-travel-area/common-travel-area>

- 6.134** These cases must also be reported to the VSI Central Services team, which is responsible for updating the CRS Dashboard.
- 6.135** The relevant service line and decision-making centre is required to complete a review of the visa application and conduct verification checks of documents to see whether a false document was submitted with the application. If VSI finds a document to be false, a note must be added to Proviso and CRS, so that the information is readily available to Immigration Enforcement.

7. Inspection findings: Home Office engagement with sponsors and institutions

Sponsorship

- 7.1** Temporary Work, Seasonal Work and Student visa applicants all require a licensed sponsor, while an applicant for a Short-term Student (STS) visa must have been accepted to study at an accredited institution. Engagement with sponsors and accredited institutions is an important part of the Home Office's strategy for preventing visa abuses, including overstaying.
- 7.2** Organisations that wish to become sponsors have to be approved by the Home Office and be either a genuine business or educational institution with evidence of legitimate activities. Work and Student visa sponsors have ongoing sponsorship duties once the person is in the UK.

Work visa sponsors

- 7.3** The number of licensed Work visa sponsors has increased since 2020 when the UK withdrew from the EU. On 1 January 2019, there were 32,686 active Work visa sponsors. By 1 January 2023, this had increased to 56,162, and by the following year it had almost doubled to 115,117. On

2 January 2025, there were 118,934 active Work visa sponsors. The Home Office maintains a list of licensed Work visa sponsors on GOV.UK.

7.4 Sponsor licences for the Work visa route are issued by the VSI's Work Sponsor Licence Unit. Between 1 January 2024 and 30 June 2025, of the 60,992 pre-licence sponsor applications considered by the unit, 37,304 (61.2%) were granted, 9,172 (15%) were refused, 662 (1.1%) were withdrawn, 12,819 (21%) were rejected, and 1,035 (1.7%) remained under consideration as of August 2025.

7.5 In its evidence for this inspection, the Home Office noted that management information (MI) on the reasons for sponsor licences being refused was lacking:

“At present, our systems are unable to extract the reasons for refusal. These reasons are contained within individual refusal letters, and the current system does not support reporting or aggregating this information.”

7.6 The Home Office told inspectors that the Work Sponsor Licence Unit engages with the Gangmasters and Labour Abuse Authority and the Department of Health and Social Care to promote compliance with the Immigration Rules. It also engages with the fishing and energy sectors. However, a Senior Civil Servant told inspectors

that the number of Work visa sponsors made it “difficult to be proactive” in terms of compliance checking. Unlike the Student visa or the Seasonal Worker visa routes, the Temporary Work visa route (which received 87,837 applications in the year ending June 2025) does not set any compliance targets for sponsors. Together with the lack of data about Temporary Work visa holders overstaying when their visa expires, this means that the Home Office cannot reliably assess the level of abuse of the Temporary Worker visa route.

- 7.7** Staff from VSI’s Sponsor Compliance Network visit employers to assess compliance with their sponsorship duties. Between 1 January and 30 June 2025, Network staff made 634 visits, comprising 562 for the Skilled Worker route, one for the Study route, eight for the Temporary Work route, 14 for the Temporary and Skilled Worker route, and 49 for the Seasonal Worker route.
- 7.8** The Work Sponsor Compliance Assurance team can revoke sponsor licences. Between 1 January 2024 and 30 June 2025, 2,587 sponsor licences for work visa routes were revoked. In this period, the most common reason noted by the team was “Ceased trading/operating” which accounted for 1,041 (40.2%) revocations. In 590 (22.8%)

revocations, the reason noted was “Tier 2/5-CoS misuse”.⁴⁹

7.9 The Home Office can refuse a sponsor licence application or suspend companies from holding a sponsor licence. A suspension is usually limited to 12 months for a first case of non-compliance and 24 months for a repeated case. However, refusals and suspensions are of little use against rogue companies intent on non-compliance, as they can be dissolved and reformed under different names.

49 In early September 2025, the new Minister for Migration and Citizenship referred to a crackdown on employers abusing the Work visa system and reported that record numbers of visa sponsor licences were being revoked. The minister explained that many asylum claims were coming from visa overstayers, with employers attempting to defraud the system. To identify and sanction them, the government had ensured better intelligence sharing between departments and law enforcement, and the results were starting to be seen as sanctions had increased by over 100% in 12 months, and visas for workers had fallen by 48%. According to evidence submitted by the Home Office for this inspection, between July 2024 and June 2025, almost 2,000 licences allowing companies to bring in migrant workers were revoked, more than double the number in the previous 12 months. Employers in adult social care, hospitality, retail and construction were reported to have been among the biggest offenders.

7.10 Trends in the Work visa route are discussed at regular internal meetings, including with Immigration Enforcement.

The Seasonal Worker visa route

7.11 Seasonal workers come to the UK to work in specialised seasonal jobs, such as fruit picking and poultry processing, and are expected to leave once that work has come to an end.

7.12 As of August 2025, the Seasonal Work route involved six sponsors, selected by the Home Office in collaboration with the Department for Environment, Food & Rural Affairs. These were Agri, Concordia, Fruitful, HOPS, Pro-Force and RE People. In 2024, the Home Office issued 35,561 Seasonal Worker visas.

7.13 A senior manager within VSI told inspectors that the route works well in terms of monitoring and compliance. They said that it:

“...has some worker mobility and is a good model. We would welcome it being used on other routes. For lower-skilled workers, we think it adds a layer of protection for the workers.”

7.14 In terms of compliance, seasonal workers who overstay may be sent a Notice of Liability to Remove. Between 1 March 2024 and 8 April 2025, 874 seasonal workers were sent such notices. However, the Home Office’s focus is on the

sponsors, and it described the threat of revocation of sponsor licences as “the biggest lever we have”. It monitors the levels of compliance of each sponsor on a rolling 12-month basis. The Key Performance Indicators (KPIs) for the sponsors have a 97% target for ensuring that the workers they nominate are granted visas, that the workers arrive to undertake the role, and that they do not overstay. Between 1 January and 30 June 2025, Sponsor Compliance Network staff made 49 visits to seasonal worker sponsors.

7.15 The Home Office also regularly engages with seasonal worker sponsors through bi-monthly calls and ad hoc contact about specific cases. This creates a relationship based on compliance, according to one sponsor. They told inspectors:

“For the Home Office [compliance is] ... their biggest priority. It is the most important of our KPIs. All sponsors take it extremely seriously... This scheme is our business and if we lose our licence that is our business finished. The Home Office shares the information with us to show how we are doing.”

7.16 Another sponsor told inspectors they were in regular touch with the Home Office:

“The Home Office holds bi-monthly calls for us to raise any issues and concerns. We are in regular email contact.”

7.17 Inspectors noted that overstayers were mentioned during the regular meetings with seasonal worker sponsors, according to the minutes kept by the Home Office. A sponsor gave an example of how this worked in practice:

“They warn us in advance if we need to do more or stop recruiting from certain countries. For example – we withdrew from [a certain] market, partly because of the overstayer rate. We only bring in returnees from [that country], people who have a history with us.”

7.18 Although the Home Office was regularly meeting with seasonal worker sponsors individually and discussing trends and compliance, inspectors did not see any evidence of a forum for the Home Office and the six sponsors to share best practice.

7.19 One of the sponsors told inspectors that the Home Office accepts evidence of return tickets to confirm their departure from the UK, but these were not a guarantee that a person has travelled. This sponsor used a bespoke piece of software to manage their placements of seasonal workers at farms, and this included a section called ‘returning home’ where workers have to complete a return notification as they leave the UK, uploading a live ‘selfie’ which can be geolocated and dated to prove that they have left. The sponsor told inspectors that the Home Office does not have access to this software and does not use the

information the sponsor captures to measure its compliance.

Study routes: Student visas

- 7.20** An applicant wishing to study in the UK can apply for a Student visa if they wish to attend a long course of study, typically one lasting a number of years, or a Short-term Student (STS) visa if they wish to study English for between six and 11 months.
- 7.21** Long-term Student visa routes require the applicant to have a student sponsor that meets the Home Office’s suitability and capability requirements. The Home Office maintains a list of licensed educational institutions, which is published on GOV.UK.⁵⁰
- 7.22** ‘Student sponsor guidance’ states that as part of their duties prospective student sponsors must promote compliance and:
- “...take responsibility for all its sponsored students while it is sponsoring them, including by doing all it can to ensure that prospective students are genuine students who can comply with the Immigration Rules, and that students

50 UK Visas and Immigration, ‘Register of licensed sponsors: students’ (first published 13 November 2013). <https://www.gov.uk/government/publications/register-of-licensed-sponsors-students>

enrol, comply with their conditions of leave, and see their course through to completion.”⁵¹

- 7.23** Between 1 January 2024 and 30 March 2025, the Home Office received 136 pre-licence sponsor applications from prospective student sponsors. Of these, 17 (22%) were granted; 15 (11%) were refused, six (4.4%) withdrawn and 72 (52.9%) rejected. As of August 2025, 13 (9.6%) were outstanding.
- 7.24** Sponsor compliance is monitored by the Home Office’s Student Sponsor Compliance team and their Visiting team, which undertakes audits of all educational institutions that hold a student sponsor licence and assesses their performance. Where it finds issues, the team can sanction institutions by putting them on Action Plans. A senior manager told inspectors that sponsor licence holders are supposed to be visited once every four years, but this was not always possible due to capacity issues. There are around 1,100 Student visa sponsorship licence holders, so the Student Sponsor Compliance and Visiting team’s activities must be targeted.

51 UK Visas and Immigration, ‘Student sponsor guidance’ (updated 29 May 2025), ‘Sponsorship duties’. <https://www.gov.uk/government/publications/student-sponsor-guidance>

7.25 If the Visiting team finds evidence that a student has overstayed, they refer it to Home Office Intelligence via an online form. However, the Home Office told inspectors that it was rare for the Student Sponsor Compliance and the Visiting teams to find evidence of overstaying, as students whose visas have expired will typically have made an application either to extend their leave or to switch to another immigration route before the expiry date, thereby benefitting from section 3C of the Immigration Act 1971.

7.26 Between 1 January 2024 and 30 June 2025, 22 student sponsor licences were revoked. The most common reasons recorded for revocation were that the sponsor had failed to comply with the sponsor duties, failed basic compliance assessments, that their record keeping was poor, or there were safeguarding issues.

Study routes: Short-term Student visas

7.27 The Home Office requires that applicants for a Short-term Student (STS) visa to study English will be studying with an ‘accredited’ provider. An accredited institution is defined as an institution that meets one of the following requirements:

- is a licensed student sponsor listed on the student sponsor register

- holds valid accreditation from:
 - Accreditation UK
 - the British Accreditation Council
 - the Accreditation Service for International Colleges
- holds a valid and satisfactory full institutional inspection by one of the following bodies:
 - Estyn
 - Quality Assurance Agency for Higher Education
 - Education Scotland
 - Office for Students
 - Independent Schools Inspectorate
 - Office for Standards in Education, Children's Services and Skills (Ofsted)
 - Education and Training Inspectorate Northern Ireland
- is an overseas higher education institution which offers only part of its programmes in the UK

7.28 The Home Office does not set compliance targets for accredited providers, who are not obliged to inform the Home Office if a student stops attending their course.

- 7.29** The Home Office engages with providers through meetings attended by trade bodies and relevant stakeholders. One trade body told inspectors that the Home Office is in frequent email contact with them about individual applicants.
- 7.30** A trade body representing accredited providers of English courses told inspectors about the difficulties providers have in obtaining the information required to ensure that students are compliant with their visa. They said that the lack of immigration arrival stamps in passports was unhelpful in this regard, with the phasing out of physical vignettes making it even harder.
- 7.31** The same trade body told inspectors that their members had a 97% departure rate for STS visa holders at the end of their courses, and therefore most of their members would have no experience of overstayers.
- 7.32** However, the May 2025 white paper entitled ‘Restoring Control over the Immigration System’⁵² noted the vulnerability of the STS route to migrants intending to claim asylum after they have arrived.

52 Home Office, ‘Restoring control over the immigration system: white paper’ (published 12 May 2025), p. 36. <https://www.gov.uk/government/publications/restoring-control-over-the-immigration-system-white-paper>

- 7.33** Plans set out in the white paper included a review of accreditation bodies, strengthening accreditation standards, and the introduction of a ‘Genuine Intention to Study’ rule, where applicants must demonstrate that they genuinely intend to study in the UK.
- 7.34** A Home Office Senior Civil Servant told inspectors that there was an understanding that the white paper would lead to an increase in compliance requirements for STS course providers, as well as more interrogation of trends in non-compliance, and observing that “STS needed tightening and that is what the white paper will do”.

8. Inspection findings: Home Office engagement with migrants

Introduction

8.1 The Home Office seeks to prevent overstaying, as well as other immigration offences, by trying to ensure that migrants who are either planning to come to the UK, or are already in the UK, understand the conditions of their permission to stay and the consequences of breaching those conditions. The Home Office also ensures that applicants are confident about approaching the Home Office should they need to do so, for example where there is a change in their circumstances that affects their immigration status. It does this through both written and oral communications.

National Community Engagement Team

8.2 The Home Office's National Community Engagement Team (NCET) was established to engage proactively with diaspora communities throughout the UK to improve communication, trust, and immigration compliance. NCET is part of UK Visas and Immigration's Operational

Capabilities Command. NCET has six Senior Executive Officer engagement leads, and two Higher Executive Officer community engagement officers, all of whom attend community events and visit cultural and religious organisations.

- 8.3** The NCET holds a monthly engagement meeting online to update its external stakeholders on its recent activity. These include community groups, non-governmental organisations and charities, who access the meetings by a mixture of invitation and request. Inspectors attended two of these meetings and noted the enthusiasm within the team and the good rapport that team members had with regular stakeholders.
- 8.4** NCET publicises the availability of the Voluntary Returns Service (VRS) for people who have overstayed their visas but wish to leave the UK voluntarily and receive financial and/or logistical assistance to do so. It has a range of promotional materials which it distributes at events, including wallet cards, booklets, family booklets, leaflets, and posters.⁵³
- 8.5** An NCET staff member told inspectors that overstayers were its “number one priority”. NCET

53 Home Office, ‘Voluntary Returns Service: awareness materials’ (updated 21 February 2024). <https://www.gov.uk/government/publications/awareness-materials-order-form>

told inspectors that they had recorded 40,000 “encounters” in 2024, which included the number of phone calls received and the number of attendees to its presentations. However, it was difficult to quantify how successful the team’s engagement was in preventing overstayers, educating people about the risks of overstaying, or encouraging migrants to re-engage with the Home Office.

- 8.6** NCET produces a monthly performance pack, an insights report and an end-of-year report. An NCET staff member told inspectors that the reports “can go to the government if needed”, but they are not widely distributed within the Home Office or used for intelligence purposes. Inspectors were provided with a copy of one of these reports, which featured details on the nationalities the NCET had engaged with, and the number of individual engagements, but no information on referrals to the wider Home Office.

Published information

- 8.7** Inspectors asked the Home Office for a narrative explanation of how the risks of overstaying are publicised. It responded:

“The Home Office employs a strategy to publicise the importance of compliance with immigration laws, focusing on creating a compliant environment rather than singling out

overstayers. This approach involves educating and informing the public about the broader implications of immigration compliance to emphasise the importance of adhering to immigration laws.”

8.8 It is widely accepted that information published by the Home Office plays an important part in educating people and preventing non-compliance with the immigration rules, including overstaying. In a written submission for this inspection, a stakeholder stated:

“Improving the clarity and accessibility of Home Office information is... not only a matter of administrative efficiency but also a necessary step in safeguarding individuals from falling foul of the immigration system through no fault of their own.”

GOV.UK

8.9 GOV.UK is designed to be as clear and easy to use as possible. The pages on the site dedicated to complying with the immigration rules that the Home Office shared with inspectors are focused on ‘Entering and staying in the UK’. These parts of the site are extensive, and some visitors could find them confusing.

8.10 A charity supporting refugees and migrants said that GOV.UK is structured in a confusing and

unclear way. Instructions and guidance were not always intuitive, leading to mistakes in applications. The charity gave the example of people applying for replacement Biometric Residence Permits (BRPs) instead of renewing their leave to remain, because of ambiguous language on the site.

- 8.11** Another stakeholder submission also referred to BRP-related problems. The last BRPs expired on 31 December 2024 and carried that date, which in most cases was not the expiry date of the holders' leave to remain. Some migrants had not yet set up UK Visas and Immigration (UKVI) online accounts where they could access the expiry date and conditions of their leave to remain, and so they could unintentionally become an overstayer.
- 8.12** In another 'call for evidence' response, a member of the public recounted their spouse's experience of unintentionally becoming an overstayer and how regularising their status took longer and was more difficult due to the challenge of contacting the Home Office, and the lack of clear and unambiguous published information.
- 8.13** A legal organisation contributing to the call for evidence for this inspection commented that the VRS should be better publicised. NCET staff agreed that publicity for the VRS "could be better" to counteract a perception among migrant communities that the service was slow, and that

engaging with VRS may attract penalties, such as re-entry bans.

- 8.14** On GOV.UK, information about the VRS sits within ‘Entering and staying in the UK > Immigration offences > Deportation, removals and curtailment’.⁵⁴ Inspectors found that the information was presented clearly, however, it involved clicking through multiple pages.

Communication with visa applicants prior to arrival in the UK

- 8.15** Depending on the route applied for, visa applicants may be informed of the positive outcome of their applications by email. All refusal decision letters are sent by email.
- 8.16** Prior to the decommissioning of visa vignettes, which began on 15 July 2025, all successful Work and Student visa applicants received an email, which includes the details of the entry clearance they have been granted, guidance on checking the physical document they have been issued, instructions on how to set up a UKVI online account, sharing their status via a share code, and how to apply for further permission to stay,

⁵⁴ Home Office, ‘Voluntary return to your home country’ (updated 17 March 2023). <https://www.gov.uk/government/collections/voluntary-return-to-your-home-country>

including settlement routes. At the time of this inspection, dependants of Student and Work visa holders continued to receive this email.

- 8.17** Where an application was submitted after 15 July 2025, all successful Student and Work visa applicants receive an email that includes: confirmation that their application has been successful; entry clearance dates; and information on eVisas. The email also includes how to create a UKVI online account and how to use it to share immigration status, advice on maintaining a continuous stay, and how to apply for future visas, including settlement advice similar to the letter issued to those who applied before 15 July 2025.
- 8.18** During case sampling for this inspection, inspectors found that email notifications for successful applicants and decision letters for those being refused were not always clear. Some parts of decision letters were templated, for example, whether a visa application has been refused, with a mixture of standard wording and free drafting by decision makers. All email notifications were automatically generated in a standard format with personalisation limited to applicant name, application reference, visa type, visa start date and expiry date. This was also raised by stakeholders, who noted that decision letters and notification emails could be ambiguous, leading to misunderstandings. Stakeholders told inspectors

that decision letters did not always specify the expiry date of their leave or visa, which is a missed opportunity to remind the individual that they must act before that date if they want to apply for an extension of stay.

8.19 Home Office caseworkers noted that migrants had difficulties in understanding correspondence such as decision letters. One officer told inspectors:

“This is a real problem. People receive a 50-page refusal notice. It is impossible, no one can understand what is going on.”

8.20 Stakeholders also said that when migrants do contact the Home Office for information, they often receive generic and unhelpful email replies and are told that the Home Office cannot give immigration advice, despite it being information that is being sought, not advice.

8.21 Inspectors noted that Home Office staff were themselves unclear about the period of validity of Short-term Student (STS) visas. STS visa holders are permitted to stay in the UK for 30 days after the end of their course of study, or at the end of the 11-month validity of the visa, whichever

is sooner.⁵⁵ In interviews with inspectors, Visa, Status and Information Services (VSI) managers and caseworkers gave conflicting answers about whether a visa holder staying in the UK for longer than 30 days after the end of their course but within the 11-month validity period of the visa would be classed as an overstayer.

8.22 Having conferred with decision-making colleagues, a manager told inspectors:

“All STS are issued for 11 months regardless of length of course. And yes, the visa expiry is either 30 days after the end of the course or 11 months, whichever comes sooner. But the applicant will be granted for 11 months regardless.”

8.23 Inspectors sought written clarification regarding the point at which an STS student would be considered an overstayer. The Home Office explained that a visa vignette or eVisa may show up to 11 months’ validity, but students must leave the UK within 30 days of their course end date, regardless of visa expiry. They must refer to information supplied by their education provider to

55 Home Office, ‘Immigration Rules Appendix Short-term Student’ (updated 4 September 2025). <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-short-term-student-english-language>

check their course end date, and this is explained in their issue letter.

8.24 The submission clarified when an STS student would be considered an overstayer:

“A student who remains in the UK beyond 30 days after their course ends – even if their visa has not yet expired – will be considered to be someone who no longer meets the requirements of the rules. Their permission will be liable for cancellation under Immigration Rule 9.2.3 although they will not be considered an overstayer until their leave has been cancelled or has expired.”

8.25 The Home Office acknowledged that STS students may be confused about their visa expiry date as they could be in possession of documents showing different dates:

“...the expiry date on the eVisa or vignette does match the expiry date stated in the decision letter issued by the Home Office. However, this may not align with dates on documents issued by other institutions (e.g. universities or sponsors), which are outside the Home Office’s control.”

Communication post-arrival

8.26 After a visa holder has arrived in the UK, they are not routinely contacted or sent information by the

Home Office. They do not receive an alert from the Home Office when their permission to stay expires, and there is no certainty that they will hear from the Home Office at any point thereafter.

8.27 In response to ICIBI’s ‘call for evidence’, several respondents noted that the Home Office could prevent overstaying by communicating more proactively with migrants.

8.28 An organisation that provided legal services said that it would be more productive to deter overstaying than to try to detect those who had overstayed. It argued that the key to this was communication from the point a person applied for a visa, and throughout the duration of their permission to stay, up to its expiry, commenting that:

“The Home Office should stop creating overstaying situations through poor IT, poor application form design, poor administration of rules and poor communications.”

8.29 Another stakeholder response suggested using the eVisa system to send alerts to visa holders whose visa expiry dates were approaching. They said that the technology was already in place to do this. However, Home Office staff told inspectors that this may cause distress, and that there may be potential issues around data quality, leading to people receiving inaccurate notifications.

- 8.30** The same stakeholder said that their experience of people who found it difficult to navigate the Immigration Rules suggested that expiry dates should feature more prominently in eVisas and decision letters. The eVisa pages could use live URL links to relevant Immigration Rules, information on the consequences of overstaying, and publicity for the VRS. This would remove the need for migrants to search for information. Setting out the meaning behind the Immigration Rules, particularly relating to the consequences of overstaying, could improve understanding among migrant communities.
- 8.31** An Immigration Enforcement (IE) senior manager told inspectors that contacting potential overstayers had previously been trialled “in the 2010s with some success”, but that if a person intends to overstay, they will likely ignore a notification.
- 8.32** Another IE manager told inspectors that any communication with visa holders who were within the validity of their visa was “cursory” and also referenced the earlier ‘nudge’ trial:

“It is a bit cursory. We put things in application notices but there is not any more communication that. More than a decade ago we piloted a nudge process – it was a long time ago and it did not carry on. It was more resource intensive than the returns.”

- 8.33** Inspectors were told that the Immigration Enforcement Digital Engagement Centre had plans to digitally ‘nudge’ people who may potentially overstay via text messages and emails. Inspectors were shown new technological solutions for maintaining contact with visa holders. These were undergoing testing at the time of the inspection. Inspectors were told that it would be much easier to trace and contact people whose visas were due to expire, or had expired, once these solutions were in place.
- 8.34** Specifically, to help prevent overstaying, the Digital Interactions team was trialling a ‘departure service’ to alert visa holders about expiry dates. Although the details of how this might work had not been finalised, an example was given of how a long-term visa holder could be contacted with reminders of their expiry date six months, three months and one month prior to the expiry of their visa. They would then be asked to confirm their intentions, or departure plans, using tick box options. Plans included allowing visa holders to upload evidence of their departure from the UK, using, for example, a photo of a passport endorsement.
- 8.35** However, a Digital Interactions team manager noted that the quality of Home Office data presents a challenge in designing an effective system. They said:

“Data [is a challenge]. A lot of changes are needed to get the data we need.”

8.36 An initial trial involving 500 potential overstayers yielded a 50% response rate. However, the trial also revealed that some of the data was incorrect, and that 25% of those contacted had already left the UK.

Insight into the reasons for overstaying

8.37 Inspectors asked migrant charity stakeholders about their understanding of the causes of overstaying. One told inspectors that, in addition to communication issues, individuals overstay due to issues with high application fees, poor legal advice, and personal crises. An immigration advice centre referred to overstaying being influenced by issues with passport renewals, while a legal association referred to poverty, illness, bereavement, and domestic abuse as some of the reasons why people overstayed.

8.38 Changes to the Immigration Rules can create challenges for individuals seeking to qualify for specific routes. For instance, in April 2024, the minimum income required for British citizens to sponsor a spouse or partner visa increased from £18,600 to £29,000. Those already in the UK who wish to stay with their partners must demonstrate

a combined income exceeding £29,000 to extend their visa. Migrants' rights groups and other stakeholders have pointed out that this requirement will be unattainable for many people. A consequence could be that some become overstayers.⁵⁶

- 8.39** UK policy changes can lead to the creation of new cohorts of overstayers. For example, the UK's exit from the EU in January 2020 meant that EU citizens who had previously had the right to live and work in the UK now required a visa to stay in the UK longer than six months, unless they secured settlement under the EU Settlement Scheme. Home Office staff told inspectors that some EU nationals were now overstaying their entry conditions. Between 1 March 2024 and 8 April 2025, 913 Romanian nationals and 326 Polish nationals were issued with a Notice of Liability to Remove due to overstaying.
- 8.40** Global events and changes in the political, economic, or security situation in their home country may also be factors in someone's decision not to leave the UK when their visa expires.

56 House of Commons Library, 'The financial (minimum income) requirement for partner visas' (published 13 January 2025). <https://commonslibrary.parliament.uk/research-briefings/sn06724/>

- 8.41** In interviews and focus groups, some Home Office staff referred to external circumstances causing overstaying, with one manager commenting that “it is not fair to say that every overstayer is complicit and intentional.” Exploitation was also cited as a cause of overstaying by Work visa holders who arrived in the UK only to discover that the job vacancy they had applied for did not exist.
- 8.42** However, inspectors found that the prevailing view among Home Office staff was that the majority of overstayers had made a conscious decision to do so. Staff referred to the lack of a deterrent causing overstaying as there is a perception that “nothing happens to you if you overstay.” One manager said, “certain visa types are easier to abuse in that respect ... It is the abuse of legitimate routes and legitimate ways to enter the UK and that acts as a key enabler for overstaying.” Staff in VSI, IE and Home Office Intelligence cited “desire to work”, “desire to be with family” and “abuse of the asylum system” as the main reasons for overstaying. Meanwhile, Home Office managers working in three different policy areas separately told inspectors that “economic reasons” were the “leading driver” for overstaying.
- 8.43** Inspectors received a mixed response to the question of whether the Home Office understood the causes of overstaying. While some staff believed the department had a clear grasp of

the issues, others were uncertain, and a number felt that the understanding was “speculative” and based on “conjecture.” One Home Office manager stated it “would be really valuable” to develop a better insight into the reasons for overstaying by debriefing identified overstayers.

9. Inspection findings: Data and systems

Introduction

9.1 Inspectors were interested to learn whether the systems⁵⁷ and data the Home Office used to prevent and detect overstayers were efficient and effective, including how integrated they were, and what staff and managers felt about them.

Systems in use

9.2 The Home Office provided inspectors with a list of 23 systems used by staff to identify and manage overstayers. However, while onsite for this inspection, inspectors were made aware of several other IT systems that had not been listed.

9.3 When a decision maker is assessing a visa application, they are required to perform a series of compulsory Operating Mandate checks, which involves analysis of information contained on various Home Office systems. Inspectors were told that previous periods of overstaying would be identified through these checks.

9.4 However, staff from Immigration Enforcement, and Visa, Status and Information Services (VSI)

57 A system refers to a data application.

believed that the Home Office's ability to prevent and detect overstayers was significantly hindered by limitations in systems and data. One told inspectors that "people overstay five, ten or 20 years under the radar [because the Home Office] do not have a very effective system" in monitoring overstaying.

- 9.5** Inspectors were also told that the Home Office's capacity to fix these issues was limited, because of the financial and resource cost they would entail.

Atlas

- 9.6** Among the 23 systems listed by the Home Office was Atlas, which was described to inspectors as "the Home Office's comprehensive casework database". However, the use of several other systems and databases to support the identification and management of overstayers suggested that Atlas was not regarded as comprehensive.

- 9.7** Atlas is not checked for previous overstaying as standard practice. It is checked only if the Operating Mandate checks produce adverse information. Two senior managers told inspectors that they did not believe an Atlas check was necessary for every visa applicant to see if they had overstayed previously, because a check on

the Visa Identity Management Application (VIMA) would suffice.

- 9.8** Inspectors heard repeated criticisms of Atlas from senior and other managers and staff from different teams, including visa decision makers (DMs). It was described as “awkward”, “useless”, and “cumbersome”.
- 9.9** Visa DMs described information on an individual’s previous departure from the UK, which was crucial for determining whether and how long someone had overstayed, as “obscure and hard to find” in Atlas. The problem was exacerbated when an individual had a long immigration history in the UK, making Atlas navigation a time-consuming business. Inspectors experienced these difficulties first-hand when conducting their case sampling exercise.
- 9.10** Visa duration dates are not detailed on an individual’s Atlas landing page. Finding the visa ‘from’ and ‘to’ dates on Atlas requires clicking through multiple pages.
- 9.11** Staff from Immigration Enforcement’s National Command and Control Unit told inspectors that Atlas was “difficult to read”, which slowed down call handlers checking a person’s immigration status for external agencies, such as police forces.
- 9.12** Visa DMs told inspectors that the ‘Possible Overstay’ outcome flag on an Atlas Initial

Status Analysis (ISA) ‘case card’ is misleading, as individuals may in fact have leave under section 3C of the Immigration Act 1971 (s.3C leave). Inspectors were told that DMs ignored the outcome flag because they did not trust its accuracy.

- 9.13** Atlas was described as “less user-friendly” than its predecessor, the Case Information Database (CID). CID was fully decommissioned by the Home Office in April 2025, shortly before the onsite phase of this inspection. However, the two systems had co-existed for several years prior to this, which had resulted in a lot of double keying.
- 9.14** In anticipation of CID being decommissioned, CID data was migrated to Atlas. However, staff told inspectors that it was difficult to navigate the migrated data on Atlas, as the two systems did not “work in the same way”.
- 9.15** When CID was operational, it had had a training environment that supported users who were learning to navigate the system. One team told inspectors there was “no suitable training provision for Atlas”. Staff were unable to train new colleagues on Atlas using live cases, as access to an individual’s Atlas page required a valid business need. Although a platform existed to create dummy cases, these had a limited lifespan, which meant it was not possible to create a permanent repository of examples for training purposes.

- 9.16** Staff told inspectors that complaints about Atlas had been fed back to the relevant people, but while inspectors heard about efforts to rectify some of the issues identified, there appeared to be minimal progress in making it easier for users to navigate the system.
- 9.17** The Home Office runs an annual Atlas satisfaction survey to gather user feedback on the system, and to help the Digital, Data and Technology team “prioritise future Atlas improvements”. Inspectors reviewed the key findings from the 2024 survey.⁵⁸ Respondents said finding information to develop an understanding of an individual’s immigration history and status was challenging, and felt that system instability, which often resulted in error messages, led to slower working. Inspectors heard similar criticism while onsite for this inspection, which shows that limited progress has been made since the 2024 survey.

CRS, Proviso, VIMA and Border Crossing (BX) tools

- 9.18** The Central Reference System (CRS) serves as the Home Office’s visa database. It holds details of all visa applications submitted at Visa Application Centres abroad, including historic data. The

58 At time of writing, the 2025 Atlas satisfaction survey results had not been circulated to Home Office staff.

Operating Mandate requires all applications to be checked against CRS.

- 9.19** All visa applications which require an applicant to attend a Visa Application Centre overseas are processed using the Proviso system. Information entered into Proviso is updated automatically on CRS within 24 hours. However, staff described the Proviso system as “slow” and “glitchy”, which impacted a DM’s ability to meet their performance targets for processing applications.
- 9.20** Four of the Operating Mandate checks – the Border Crossing (BX) tool, IDENT1 (the UK police database), IDENT Special Collection (SC), and the Immigration and Asylum Biometric System (IABS) – require a DM to look at the VIMA system. VIMA is accessible via Proviso and flags any biographical or biometric match relating to a visa applicant, some of which may be adverse. It does not identify an individual as a previous ‘overstayer’ but may flag a ‘match’ that prompts a DM to scrutinise their immigration history further on Atlas. DMs confirmed to inspectors that if they suspected someone was a previous overstayer, because there was a VIMA ‘match’ or for other reasons, they would investigate the individual further using Atlas.
- 9.21** If an individual has previously overstayed, it may be logged on the BX system, which automatically

feeds into the VIMA screen found on Proviso. Border Crossing will pick up an overstayer if they:

- have been identified as part of an automated exit check
- were identified by Border Force on departure from the UK⁵⁹
- were encountered by Immigration Enforcement
- either departed the UK voluntarily or were removed

9.22 The automated Border Crossing check shown in VIMA is run against the exact biographical details found in the visa application being assessed. Therefore, if an applicant declares any previous or alternative names on their visa application form, the DM has to check the forms manually.

9.23 IABS retains biometric information on previous applications for ten years. In conjunction with confirming any previous biometric matches, DMs are expected to check for details of any historic applications on CRS, which holds data for longer.

9.24 Staff working in visa decision-making teams were broadly complimentary about VIMA and BX when discussing these systems with inspectors.

⁵⁹ Outbound checks are not undertaken routinely but may be conducted during targeted exercises on specific flights.

MIDAS Travel Data Service

- 9.25** The Home Office told inspectors that the Management and Data Analytics Service (MIDAS) Travel Data Service (MTDS) “may help to identify previous overstayers”. Visa DMs are able to request a report of an individual’s entries to and departures from the UK, where these are recorded.⁶⁰ MTDS searches passenger manifests to reveal an individual’s dates of entry and departure, enabling DMs to calculate the length of previous stays in the UK.
- 9.26** MTDS checks are not compulsory Operating Mandate checks. They are carried out at the discretion of the DM. DMs told inspectors that they would request an MTDS check if they suspected someone may have previously overstayed. Immigration Enforcement teams also used MTDS in support of their investigations and were able to request bulk checks of up to 150 individuals at a time.

Initial Status Analysis system

- 9.27** MTDS is a product of the Initial Status Analysis (ISA) system. Home Office systems, including

60 Only travel linked to the current passport is recorded. Furthermore, there are no routine immigration controls for routes between the UK and the rest of the Common Travel Area.

Atlas and CRS, feed into ISA data to help determine whether an individual has valid leave to remain in the UK, or whether leave has expired.

9.28 ISA also indicates whether the individual is ‘in country’ or ‘out of country’, using Advance Passenger Information (API). API is required to be provided to the Home Office by operators of international flights, maritime and Channel Tunnel rail services. ISA matches this inbound and outbound travel data with data recorded on other Home Office systems and produces an ISA identity status. See Figure 14.

Figure 14: Types of ISA identity status

	Individual is in the UK	Individual has left the UK
Visa period is valid	In country valid leave	Out of country valid leave
Visa has expired and no valid leave	No departure record – Probable overstayer	Out of country leave expired compliant (if individual left prior to visa expiry); or Out of country – departed overstayer (if individual left after visa expiry)

9.29 ISA went live during the Home Office’s Exit Check Programme, which ran from April 2014 to May 2016, and was focused on the acquisition and processing of outbound travel data.

9.30 Between 2016 and 2020, the Home Office published exit check data annually. This included

the number of visa nationals who were not matched to a departure record. Since 2020, the Home Office has not included exit check data in any of the migration statistics releases published on the GOV.UK website.

- 9.31** The Home Office told inspectors that the COVID-19 pandemic, the UK's exit from the EU, and "changes to Home Office caseworking systems" had impacted the way in which data was collected and compiled, which therefore "affected the accuracy of exit check statistics". In 2022, the Home Office published a report⁶¹ which outlines the challenges in measuring exit check statistics, and the development work to resume publication of these statistics. The Home Office indicated that exit check data since 2020 was too inaccurate to publish.
- 9.32** Inspectors were told about ISA inaccuracies due to data input errors. A senior manager explained that API data provided by airlines can be "wrong" and "not rectified", citing an example where an operator had mixed up Niger and Nigeria. It was stressed to inspectors that the Home Office is reliant on the source to provide accurate data. However,

61 Home Office, 'Developments in Exit Checks' (published 24 February 2022). <https://www.gov.uk/government/statistics/developments-in-exit-checks/developments-in-exit-checks>

the greater problem was inaccuracies with ISA data due to departures not being identified in API, so that it appeared an individual was still in the UK when they had in fact left. This included individuals who had left the UK via the Common Travel Area,⁶² as well as dual nationals who left the UK on a different passport to the one they used to enter.

- 9.33** Due to ISA's inability to pick up on every type of departure from the UK, an individual identified by ISA as in the UK with no valid leave is flagged as a probable overstayer rather than as an overstayer. Inspectors were told that "in ISA world,

62 "The CTA [Common Travel Area] is an administrative arrangement between the UK, Ireland and the Crown Dependencies (Isle of Man, Guernsey, and Jersey) which is implemented in UK domestic law in statute. Under the CTA, British and Irish citizens can move freely and reside in either jurisdiction." Home Office, 'Common travel area' (updated 17 September 2025). <https://www.gov.uk/government/publications/common-travel-area/common-travel-area>

overstayers are always a 'probable' because they may have left."⁶³

- 9.34** Another senior manager told inspectors there were “legal concerns around the reliability” of ISA data. ISA’s inability to say for certain whether someone is an overstayer means that data on the probable overstayer cohort is not used as an evidence base for creating the risk profiles, which are fed into the Complexity Application Routing Solution (CARS) for the Visit and Study service lines.
- 9.35** Visa DMs do not have direct access to ISA data and have to request it from Enrichment teams via a spreadsheet. Inspectors were told by a Home Office policy team that ISA has “too many exceptions” which can mean that analysing the data it produces “can be guesswork”, thus making it more difficult to identify overstayers.
- 9.36** The business rules for the ISA system were not helping. Inspectors were told about an international figure who had visited the UK and was now classed as a probable overstayer because there was no record in API data of their departure from

63 In its factual accuracy response, the Home Office stated: The exit check statistics are clear that “Individuals with no departure recorded were not necessarily non-compliant. They may have departed and not been recorded, or their departure may not have been matched against their arrival by the system.”

the UK. This individual had appeared overseas in international news broadcasts since their visit to the UK. Staff therefore knew that they had left the UK, but the Home Office did not possess the data confirming it. Without this confirmation, staff were unable to close the case, and the individual remains a probable overstayer on Home Office systems.

- 9.37** Inspectors asked why more progress had not been made since 2020 to resolve the various data issues and resume the publication of exit check data. A senior manager told inspectors that “competing priorities” and a lack of “appetite” were contributing factors, although they acknowledged that interest in overstayers had grown in the past year, as evidenced by the number of Freedom of Information requests, parliamentary questions, and MPs’ correspondence received by the team.

Recording overstayers in Atlas

- 9.38** Inspectors were told by the Home Office that “Atlas is the main medium through which overstayer data is recorded on Home Office systems.”
- 9.39** The ‘Alerts’ page on Atlas flags individuals who meet certain definitions to users of the system. For example, an individual who has been given a re-entry ban to the UK will be flagged as such. There is not a flag on the ‘Alerts’ page for overstayer, whether current or previous.

- 9.40** While some of those with a re-entry ban flag may have been overstayers (having overstayed for 31 days or more, where the overstaying began on or after 6 April 2017), others may have received a ban for a different breach of UK immigration laws, such as entering the UK illegally, or using deception on an application.⁶⁴
- 9.41** If ISA data has been requested for an individual, Atlas will create a ‘case card’. The ‘case card’ will have an ‘outcome’, and if ISA data is unable to match an individual on an expired visa with API data confirming departure from the UK, the outcome on the Atlas case card will say ‘probable overstayer’.
- 9.42** Inspectors asked the Home Office for the number of identified overstayers by month since 1 March 2024. Since individuals were not flagged as overstayers on Atlas, the evidence return was based on the “service of a Notice of Liability, with the reason for service being ‘Overstayer’”. This means that, unless an overstayer had been served a Notice of Liability to Remove (NOL), they were not included. Even so, the Home Office caveated the data it provided:

64 Home Office, ‘Mandatory refusal period’ (updated 7 October 2025). <https://www.gov.uk/government/publications/offender-management/mandatory-refusal-period-accessible>

“The source data for Notices of Liability has not been validated sufficiently and is not assured to a high level of confidence. Data quality issues have been observed, but have not yet been quantified. As such the data in this response should be treated as indicative only.”

- 9.43** A senior manager told inspectors that a system that was able to “identify overstayers as soon as they have overstayed” would result in immediate service of a NOL for overstaying, but as it was, there were overstayers who had not yet received a NOL.

Recording of fee waivers

- 9.44** Responding to ICIBI’s call for evidence, stakeholders said that Home Office systems and data were “creating overstayers” by incorrectly indicating that fee waiver applicants were overstayers on their eVisas, even though they would be eligible for s.3C leave, subject to certain conditions being met.
- 9.45** Permission conferred by s.3C leave means that, as long as an individual 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. Although the Home Office does not consider fee waiver applications to be immigration applications, they are treated in the same way

as an immigration application for the purposes of s.3C leave.

9.46 Home Office ‘Fee waiver: Human Rights-based and other specified applications’ guidance⁶⁵ states:

“Regardless of whether the fee waiver request is granted or refused, the applicant will benefit from 3C leave if:

- they had valid permission when the fee waiver request was submitted, and which has expired by the time the fee waiver request is decided
- the applicant makes a valid application for permission within ten working days of the date of the fee waiver decision
- the permission application that is submitted is the one for which the fee waiver request was made”

9.47 An example of where the fee waiver application process causes an issue is the online form for Further Leave to Remain (Family/Private) – FLR (FP), which is the substantive application form for

65 Home Office, ‘Fee waiver: Human Rights-based and other specified applications’ (updated 11 September 2024). <https://www.gov.uk/government/publications/applications-for-a-fee-waiver-and-refunds/fee-waiver-human-rights-based-and-other-specified-applications>

individuals who want to remain in the UK on the basis of their family life as a partner, parent or dependant child, or on the basis of their private life in the UK. The Home Office requires that a person must have received a decision on any fee waiver application before completing this online form.

- 9.48** A number of stakeholders said that the inability to record an application for a fee waiver on the FLR (FP) form, meant it did not take into account the s.3C leave granted by a valid fee waiver application, and eVisa records were sometimes failing to register this s.3C leave. However, this was not the case for everyone. Stakeholders cited examples of families where some members had their s.3C leave recorded on their eVisa, while other family members did not, with their eVisas stating that their visa(s) had expired. These inaccuracies and inconsistencies in documenting s.3C leave created a false picture of overstaying.

Case sampling

- 9.49** Inspectors examined a stratified random sample of 100 records of visa nationals who had been served a NOL for overstaying between 1 March 2024 and 28 February 2025. Inspectors focused on the actions of the visa DM, and how the process of decision making and the subsequent period of overstaying was recorded on Home

Office systems. Inspectors examined case records on Atlas and CRS.

- 9.50** Of the 100 cases, 65 had an ISA case card on the individual's Atlas landing page, with an outcome flag displayed next to it. Of the 65, the most common outcome flags were 'probable overstayer' (30 cases), and 'departed overstayer' (16 cases). There were no other references to overstaying on the Atlas landing pages for these individuals.
- 9.51** In cases where API data existed regarding an individual's departure from the UK, the outcome flag was 'departed overstayer'. Not all of these cases recorded the API data regarding the departure on the ISA case card. Where it was recorded on other case cards, inspectors found it time-consuming to find the relevant API data.
- 9.52** Previous outcome flags could be viewed by clicking into the ISA case card. Where an individual had an 'in-country application' outcome flag on the case card, as in 15 of the 65 cases examined by inspectors, clicking into it revealed in all 15 cases a previous designation of 'probable overstayer' which had been in place up to the point when the individual made a further application, such as a claim for asylum, and was granted s.3C leave.
- 9.53** Inspectors noted that, where an individual had submitted a further application triggering s.3C

leave, the Atlas outcome flag on the ISA case card was not always amended from ‘probable overstayer’ to ‘in-country application’. Visa DMs confirmed that this was so. Therefore, an Atlas user could be misled, at least initially, and think that an individual was likely to be an overstayer when they in fact had s.3C leave. This chimed with stakeholders’ concerns about the inconsistency of documenting s.3C leave.

- 9.54** In 35 of the 100 Atlas records examined there was no ISA case card. In these cases, inspectors were able to ascertain via Atlas whether an individual was an overstayer only by finding the NOL and then checking whether the reason for serving notice was recorded as ‘overstayer’.
- 9.55** The Home Office’s response to the 2024 Atlas satisfaction survey said that the Immigration History page on Atlas “allows users to determine a high-level immigration history for the customer.” However, the Immigration History page would not describe someone as an overstayer if there was no ISA case card.
- 9.56** Case study 1 provides a summary of a case examined by inspectors in which a NOL letter for overstaying was served in error.

Case study 1: Traveller issued a NOL letter for overstaying

Summary

An individual living outside of the UK was issued a UK Visit visa that was valid for a six-month period between June 2023 and December 2023. The individual arrived at an English airport on a flight from Dublin in June 2023 and departed via the same route later that month.

On two separate occasions in November 2023, the individual passed through a UK airport on journeys between Dublin and India.

The person was served a NOL letter to their Irish address in September 2024, over nine months after the expiry of their Visit visa. The letter stated:

“This notice explains that you are liable to be removed from the United Kingdom (UK).”

The letter gave the following explanation as the “reasons for decision” of service:

“You are liable to be removed from the UK for the following reasons:

You are specifically considered a person who has overstayed their period of granted leave because you were issued with a Visit visa [in June] 2023 which expired [in December] 2023.

You entered the United Kingdom [in November] 2023 and failed depart [sic] upon expiry of your visa.

You are considered an immigration offender, namely an overstayer until such time you [sic] obtain legal status in the United Kingdom. You are therefore still liable to any restrictions placed upon you at this time.”

The letter included templated wording about “help and advice on returning home” and advertised the Voluntary Returns Service.

The same letter also explained that the person was to be granted immigration bail, though gave no further details about the conditions of bail.

Atlas records showed that the Home Office ended enforcement action shortly after, having realised their mistake. The individual later applied for another Visit visa, which was granted.

ICIBI comment

This individual did not overstay at any point. The case highlights the lack of quality assurance of the service of NOL letters, and such errors call into question the Home Office’s ability to understand the scale of overstaying as it uses data on the number of NOL letters uploaded to Atlas as a metric for identified overstayers.

The NOL timeline of events is inaccurate. It fails to consider the exit check data that existed on Atlas prior to the service of the NOL, and it appears that the fact that the individual’s latest known address was in the Republic of Ireland was overlooked entirely.

The person’s ISA identity status, viewable on their Atlas landing page, was ‘probable overstayer’ between December 2023 (the day after the visa expired) and 22 October 2024. Inspectors were concerned that this could have affected decisions for any visa applications submitted during that period.

Home Office response

“Yes, they were incorrectly assessed [as an overstayer]. Exit checks were recorded on Atlas [in December 23] which places them in Dublin as of November 2023, before her [Leave to Enter for] the UK expired. Further checks could have been completed by the original caseworker to confirm this, such as entity checks or [on] MTDS, which would have shown multiple small visits into the UK during the period of their leave and dates the applicant left the UK. Furthermore, the only residential addresses we have listed for the applicant on Atlas are Irish addresses, suggesting she has never had residence in the UK. Given our business operating standards at that time, we were only serving documents to registered UK addresses, so the case should have been rejected when the caseworker discovered the applicant did not have a UK address listed.

According to records on Atlas [...] the document was only issued via email and was not sent via the post, the address listed on the letter was the most recent residential address we held for the applicant. But as previously stated, this should have prompted the original caseworker to reject the case as we would only serve documents to applicants with a registered UK address.

The PGQT [Process Guidance and Quality Assurance Team] oversees assurance checks relating to NOLs, but staff in Core area [sic] only are so far assessed [in relation to National Returns Progression Command quality assurance marking standards].

We are already working to improve QA – working with the Bail and Charter Team, and OST [Operational Support Team] – to develop frameworks for them, and they and the PGQT can collaborate to adopt the NOL framework.”

9.57 Case study 2 provides a summary of a case examined by inspectors in which the Home

Office's management of an overstayer was subject to repeated delays and administrative errors.

Case study 2: Overstayer subject to delayed enforcement action

Summary

An individual was issued a UK Student visa that was valid between September 2023 and August 2024. The person had intended to study at a UK university.

In October 2023, the university contacted the Home Office to say it had withdrawn sponsorship because the individual had not started their course.

Five months later, in March 2024, the Home Office informed the person that their visa was cancelled and they must leave the UK by late May 2024, rather than August 2024.

In February 2025, the individual claimed asylum. This triggered the service of a NOL letter a week later (over eight months after the cancellation of their visa). The 'Reasons for decision' section of the letter was left blank, presumably in error. The person was also granted immigration bail and forbidden to work.

The asylum claim was refused in July 2025. As of September 2025, the individual remained in the UK.

ICIBI comment

The Home Office was slow to act on this case at several points: 155 days elapsed between the sponsor notifying the Home Office it had withdrawn sponsorship and the Home Office letter cancelling the visa; a further 321 days elapsed before the NOL letter for overstaying was sent. The blank 'Reason for decision' section of the NOL meant the individual was not properly informed of the Home Office's rationale for issuing it.

Inspectors were unclear why the Home Office was slow in managing this case. The case study is a further illustration of the lack of quality assurance of NOL letters.

Home Office response

“The delay in processing was primarily due to impacts from measures implemented during the COVID-19 pandemic. Temporary provisions such as travel restrictions and the Exceptional Assurance Concession⁶⁶ (in effect from 1 September 2020 to 28 February 2023) deprioritised cancellation actions during this period. This period was then further impacted by events in both Afghanistan and then Ukraine, which required us to divert resource to support humanitarian and logistical efforts. A prioritisation decision was made by the VSI exec[utive] board to deprioritise cancellations to support those emergencies, which was agreed with ministers.

Following these periods, significant resource was then invested in processing the stock of notifications which had been received over that time. This significantly reduced the queue throughout 2023–2024 and the stock of reports was largely cleared by Q2 2024. Furthermore, we have now implemented a new IT system (Atlas), which streamlines the process and supports the continued efficient handling of sponsor withdrawal notifications.

66 The Exceptional Assurance Concession, in effect between 1 September 2020 and 28 February 2023, was the Home Office’s response to international travel disruption caused by COVID-19. The concession offered individuals a short-term protection against any adverse action after their permission to stay had expired.

At the time this notification was received, the Work in Progress queue was 50,000 notifications due to the impacts mentioned above. Notifications were processed in order of receipt, which is why the notification was processed in March 2024.

[The ‘Reasons for decision’ section being left blank] was an error ... Without the NOL reasons paragraph added, the applicant would not know [the reason for the service of the letter].”

Identifying the overstayer population

9.58 In March 2025, inspectors asked the Home Office for an estimate of the total number of overstayers currently in the UK. The Home Office responded that it was “not possible to produce reliable estimates” and it did not compile statistics on the number of people who overstayed their visa. Instead, the Home Office referred inspectors to published data on exit checks from March 2020,⁶⁷ which it stated gave an estimate for the number of people whose visas had expired in a given year. Inspectors were told that any Freedom of Information requests or Parliamentary Questions asking for data on the overstayer population received the same response.

67 Home Office, ‘Fifth report on statistics relating to exit checks: 2019 to 2020’ (published 27 August 2020). <https://www.gov.uk/government/statistics/fifth-report-on-statistics-relating-to-exit-checks/fifth-report-on-statistics-relating-to-exit-checks-2019-to-2020>

9.59 As of August 2025, the latest published exit check report contained data from between April 2019 and March 2020, and summarised the outcomes for the 1.9 million individuals with expired visas, with no extension or further leave in that period as follows:

- “95.2% departed [the UK] in time, before their visa expired;
- 0.4% departed late, after their visa expired;
- 4.4% were not matched to a departure record.”⁶⁸

9.60 Between August and December 2017, the ICIBI conducted an inspection of exit checks.⁶⁹ This was soon after the closure of the Exit Check Programme. The inspection made just one recommendation, which was to re-establish the programme. The recommendation set out, in detail, what this should involve and what it should achieve, including: refreshing and restating the Home Office’s ‘vision’ for exit checks; providing the Home Office Board with visibility “of this business critical enabler” of the Borders, Immigration and

68 Home Office, ‘Fifth report on statistics relating to exit checks: 2019 to 2020’ (published 27 August 2020).

69 ICIBI ‘An inspection of exit checks’ (published 28 March 2018). <https://www.gov.uk/government/publications/an-inspection-of-exit-checks>

Citizenship System; driving improvements in data quality and closing data collection gaps; ensuring travel and related data handling was Data Protection Act compliant; and ensuring that related projects and other work was properly prioritised, resourced and co-ordinated, including those to improve ISA data.

9.61 The Home Office rejected ICIBI's recommendation, stating in its published response that:

“The Exit Checks Programme closed in May 2016 having delivered its objectives. It was an implementation programme and outbound travel data which was previously not acquired is now processed routinely in line with the scope determined by the Programme. The data matching system and analytical capability built by the Programme, the Initial Status Analysis (ISA), remains in place and is delivering results. ...

As a result of the Exit Checks Programme, significant operational gains, and major policy and statistical benefits have already been realised. The increased extent of outbound travel data processed as a direct consequence of the programme is supporting national security objectives by providing the police and the security services greater insight into the outbound movements of suspected criminals

and terrorism-related subjects of interest. The matching of outbound travel movements with arrivals data and immigration records in the ISA is providing a new understanding of compliance with the immigration system and is being used for a range of immigration-related operational purposes.

While the Home Office agrees that some of the underlying issues with the processing of exit checks data are inhibiting full realisation of all potential operational benefits at this point in time, the Department believes that functional improvements in this area can be achieved through governance arrangements other than re-establishing the Exit Checks programme.”

- 9.62** The response went on to refer to other programmes, boards and projects that would address ICIBI’s detailed concerns about data acquisition and exploitation, including: a cross-departmental Border Movements Data Programme, established in November 2017; an Exit Checks Senior User Group and Data Analysis Gateway Board; an Advance Border Control project; and a Border Systems Technology Projects team.
- 9.63** Given the time that had elapsed, inspectors did not ask the Home Office for updates on these various programmes. However, it was evident that a number of the data issues and gaps

identified in the 2017 inspection report remained materially unaltered, and this directly affected the Home Office's ability to estimate the size of the overstayer population. As one data manager told inspectors, this was not possible because the department "cannot track everyone's movement in and out of the country conclusively."

Possible overstayers in the 'population of interest'

- 9.64** Immigration Enforcement's population of interest is a list of individuals who are of operational interest, including those who are suspected of being in the UK without leave to enter or remain. The size of the population of interest is not published in Home Office transparency data releases.
- 9.65** The population of interest list is informed by data from multiple Home Office systems, including Atlas, and is refreshed weekly. Individuals are removed from the list when there is a case conclusion, such as a grant of leave or departure from the UK.
- 9.66** The list is separated into an 'active' and an 'inactive' population. The active population are those where the Home Office has a record of some contact with the individual within the last two years. The inactive population represents cases where Immigration Enforcement has less confidence that individuals are still in the UK.

Inspectors were told that individuals within the inactive population (who have remained) were more likely to have started to generate rights under Article 8 of the European Convention on Human Rights (Respect for private and family life), and that those in the active population were likely to have fewer barriers to removal by comparison.

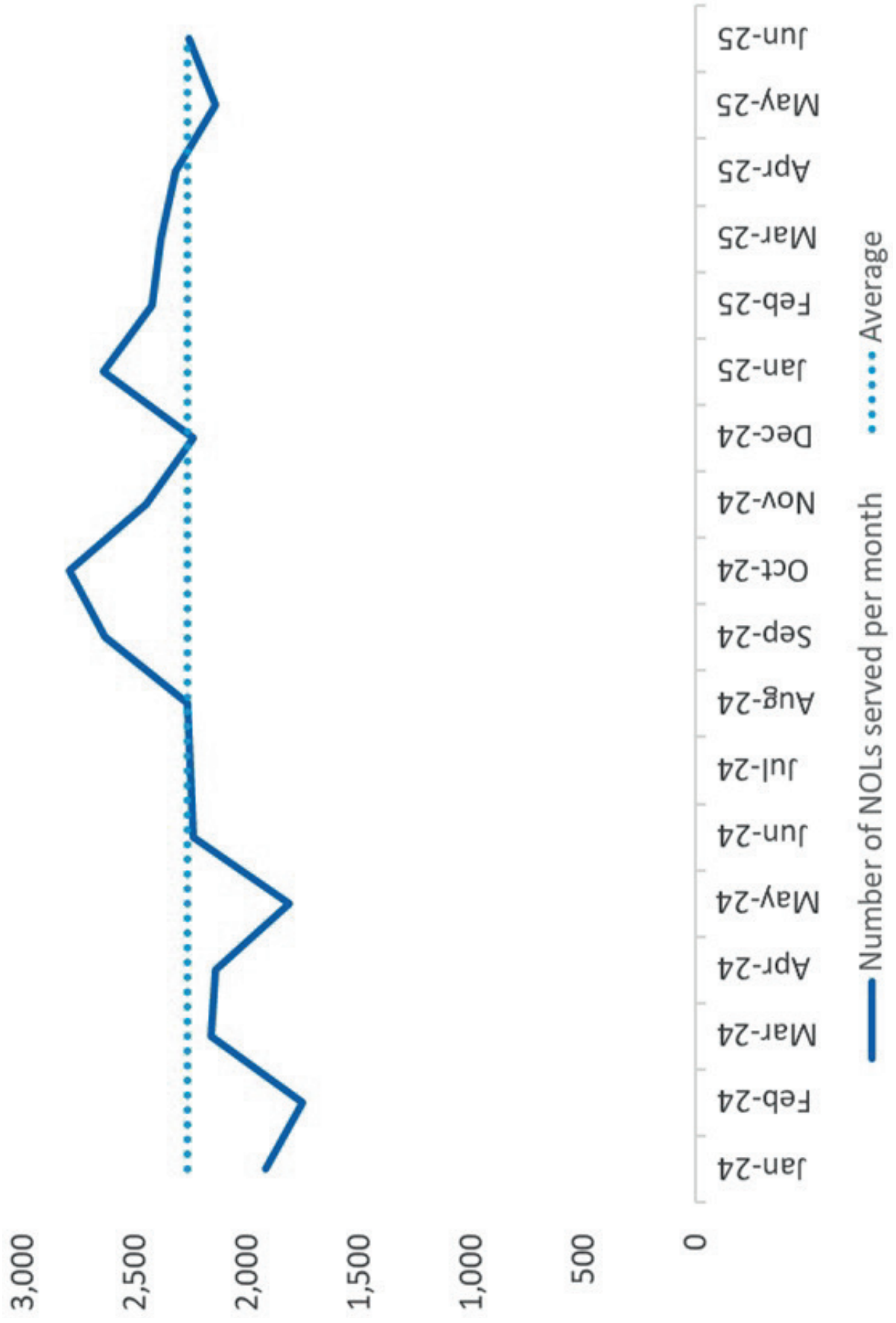
9.67 The population of interest is further broken down into categories, including ‘Foreign National Offenders (FNOs)’, ‘People Subject to Admin Removal’, ‘People with an Outstanding Asylum Claim’, and ‘Possible Overstayers’. As of 20 July 2025, there were 62,675 possible overstayers in the active population. However, individuals are recorded under one category only, according to the priority Immigration Enforcement attaches to that cohort. Therefore, an FNO who is also an overstayer is listed only under FNO, making the population of interest list of limited use when attempting to estimate the size of the overstayer population.

Overstayers served a Notice of Liability to Remove

9.68 When inspectors asked the Home Office for the number of overstayers identified by month, the data it provided was based on the service of a Notice of Liability to Remove (NOL), with ‘overstayer’ given as the reason for service.

9.69 Between 1 January 2024 and 30 June 2025, 40,860 NOLs were served by the Home Office with 'overstayer' given as the reason for service. The number served each month fluctuated between 1,755 in February 2025 and 2,792 in October 2025, with most months seeing over 2,100 NOLs served. See Figure 15.

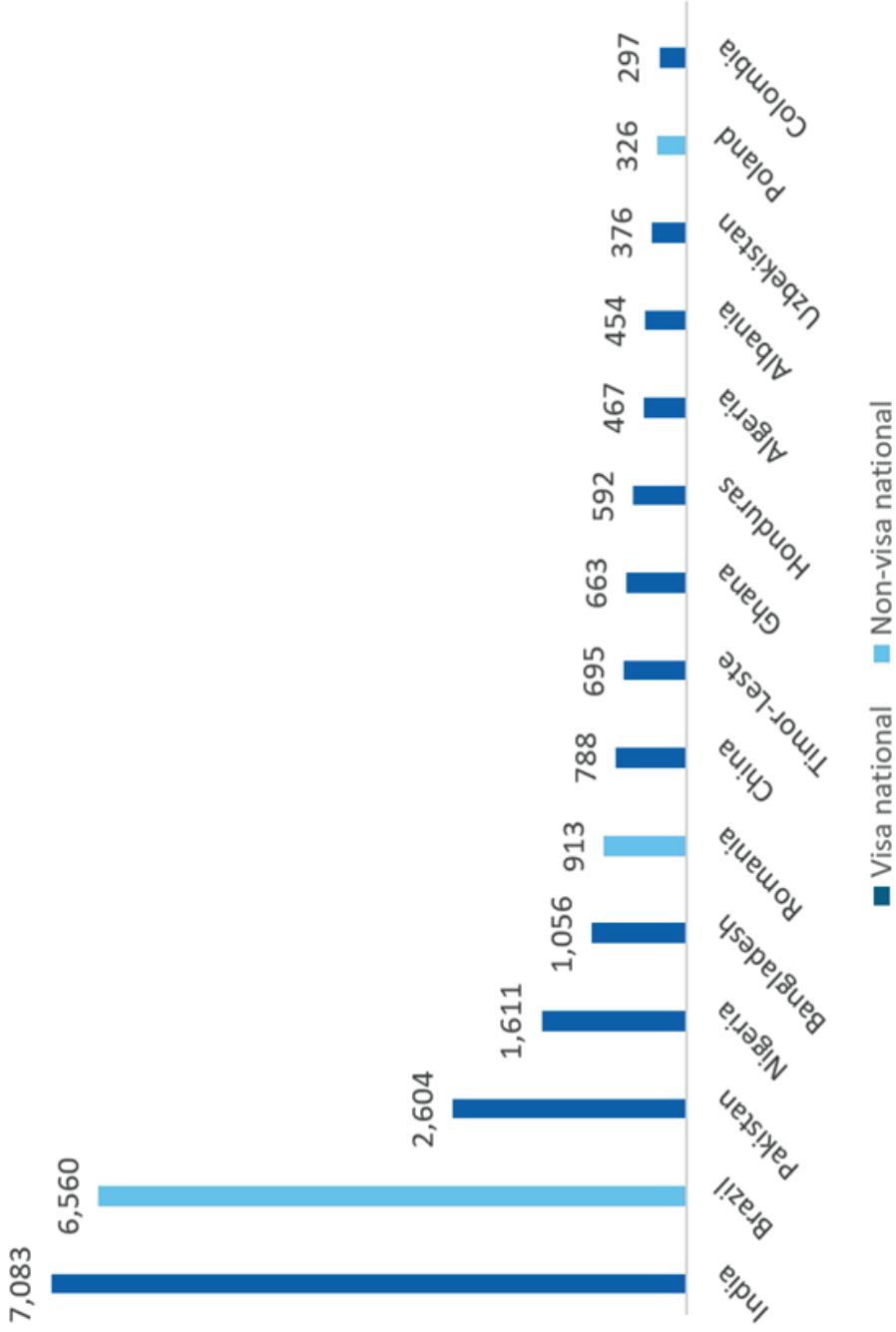
Figure 15: Number of NOL letters served by the Home Office, with the reason for service being overstayer (1 January 2024 to June 2025)



- 9.70** For a case to be included in the 40,860 total, the caseworker uploading the NOL had:
- (a) selected ‘Notice of Liability’ as the ‘Notice Type’; and
 - (b) selected ‘Admin Removal: Overstayer’ as the ‘Reason for serving notice’.
- 9.71** Inspectors were told that 40,860 did not include cases where a NOL had been uploaded to an overstayer’s Atlas page, but either the Notice of Liability or Admin Removal: Overstayer options had not been selected. A Home Office data team told inspectors that this was a “data quality issue”.
- Inspectors were also told there may be cases where an individual was served the NOL in person, but staff had failed to record the service of the letter on Atlas. These would not be captured in the data either.
- 9.72** Assuming they were accurately recorded, 40,860 was therefore the minimum number of individuals served with a NOL as an overstayer between 1 January 2024 and 30 June 2025. However, this inspection and others have identified concerns with Atlas data accuracy, both in terms of data that has been entered and omissions. Data teams told inspectors that they had fed their concerns back to the Atlas Delivery team and that solutions to address data quality were “in the pipeline”.

- 9.73** Inspectors found that the period of overstaying that triggered the service of a NOL may have occurred many months before. In the sample of 100 records examined by inspectors, the most extreme case was an individual who was served a NOL for overstaying 551 days (over 18 months) after their visa had expired.
- 9.74** Figure 16 shows the most common nationalities served with a NOL for overstaying between 1 March 2024 and 8 April 2025.

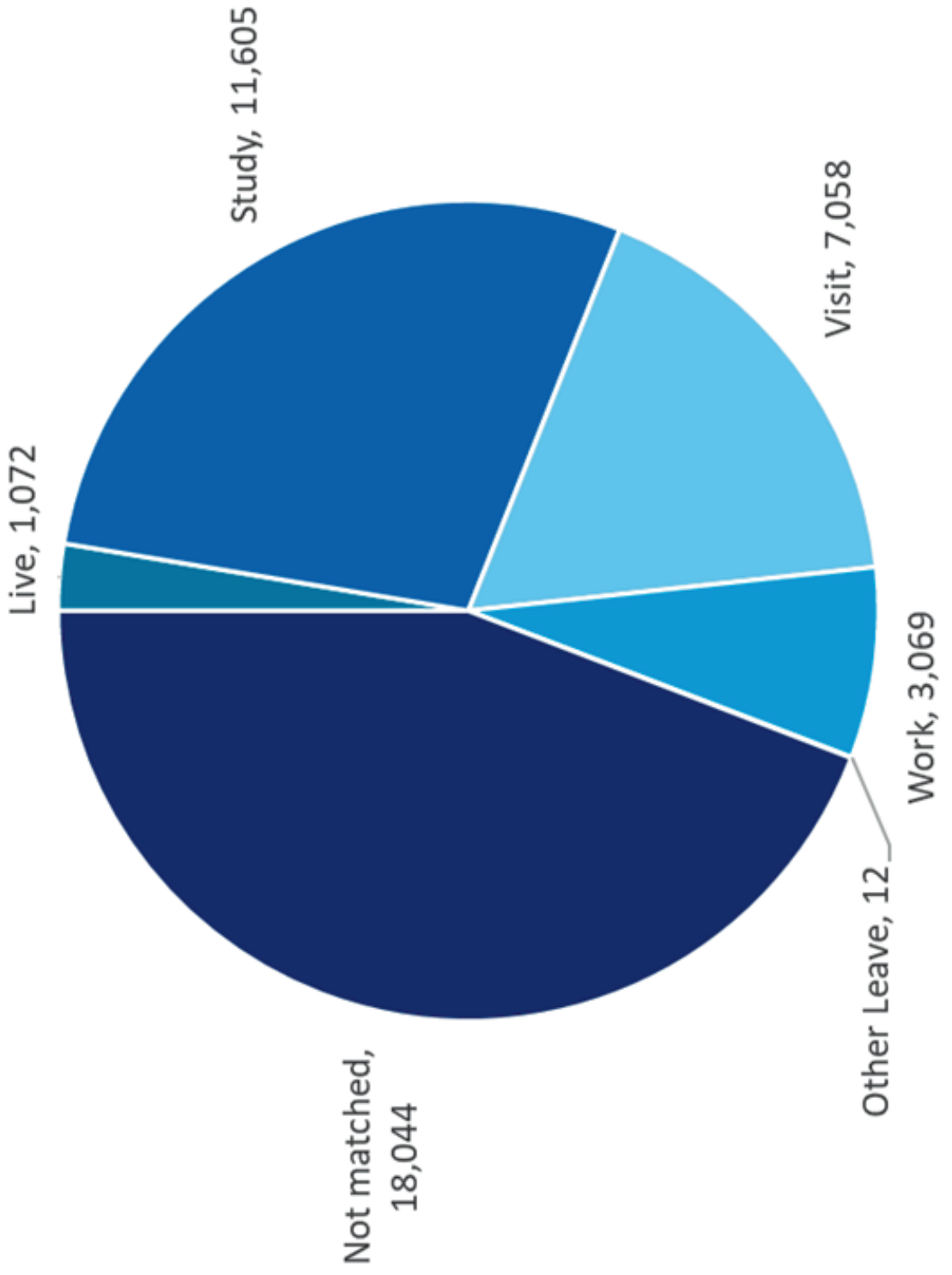
Figure 16: The top 15 nationalities served with a NOL for overstaying (1 March 2024 and 8 April 2025)⁷⁰



70 Although non-visa nationals, such as individuals from Brazil, Romania, and Poland, do not require a visa in advance of travel to the UK, they may still be served with a NOL for overstaying if they remain in the UK beyond their permitted duration of stay.

9.75 Inspectors asked the Home Office for data on the type of leave individuals held prior to service of a NOL for overstaying. See Figure 17. The Home Office was unable to match 44.2% of individuals who had been served with a NOL for overstaying with an original leave type. The Home Office attributed this primarily to non-visa nationals being served the NOL, but also said there were issues with “functionality” not matching identities between different source systems. The inability to rely on this data means the Home Office cannot be confident which types of leave are associated with a higher risk of overstaying, where to target resourcing, and which types of leave could merit additional checks at the application stage.

Figure 17: Number of NOL letters served to overstayers, broken down by type of leave previously held prior to being served the notice (1 January 2024 to 30 June 2025)



- 9.76** After a caseworker is “signed off”, the only quality assurance their NOL letters receive is done following the service of the letter, instead of prior to it.
- 9.77** NOL letters are subject to 2% random sampling for quality assurance purposes.

Impact of the inability to estimate overstayer population

- 9.78** During the onsite phase of this inspection, inspectors heard about the wider impact of the Home Office being unable to estimate the overstayer population.
- 9.79** Senior Home Office staff said that, in general, the Home Office’s ability to invest resources into an area is frustrated when there is a lack of data. Not being able to estimate the size of the overstayer population therefore impacts the allocation and prioritisation of resources. One manager suggested that Immigration Enforcement might take more action against overstayers if more was known about the scale of the problem. Meanwhile, a Home Office data team told inspectors they “have not got a dataset [they] are happy with” that could be used to manage overstayers.

Future plans – Counting In, Counting Out

- 9.80** In April 2025, inspectors were told that the Home Office plans to replace ISA with a new system called Counting In, Counting Out (CICO). While ISA focuses on compliance, CICO will count each time a person enters and leaves the UK. Individuals with valid leave to enter or remain may enter and exit the UK numerous times throughout the duration of their leave. The Home Office’s intention is that CICO will consider “wider compliance factors”, including whether an individual has entered the UK more times than their visa permits, or whether their leave has lapsed if they have been outside the UK for longer than permitted. The Home Office plans to make CICO fully operational in Q2 of 2026, at which time ISA will be decommissioned.
- 9.81** The Home Office stated that CICO will improve:
- governance, through the establishment of a new governance framework for the system’s ownership and management, and giving stakeholders the opportunity to provide feedback on the system

- data quality and outputs, by increasing the completeness of data by accessing new datasets, such as electronic travel authorisation,⁷¹ and by improving the technical approach to enhance data processing times
- accessibility, by providing better access to the data

9.82 Home Office staff were largely positive about CICO. It was acknowledged that CICO would not resolve the issue of some departures via the Common Travel Area not being captured in exit data. Inspectors were told about engagement with Ireland to resolve some of the issues, but one senior manager said that, “as it stands, there will still be data quality issues with CICO” and another told inspectors it would not change the “capability” of the data they work with.

9.83 Inspectors were told that the Home Office hoped to publish exit check data again in the future but could not commit to a timescale. It was suggested that CICO needed to be in operation before this would be possible.

71 An ETA allows non-visa nationals to come to the UK for up to six months for tourism, visiting family and friends, business, or short-term study.

10. Inspection findings: Identification of overstayers by the Home Office and external stakeholders

Home Office identification of overstayers

10.1 The Home Office told inspectors that it identifies overstayers in the UK through the following six mechanisms:

- allegations from members of the public
- Immigration Compliance and Enforcement visits
- multi-agency operations with police partners and other government departments
- the work of the National Command and Control Unit (NCCU)
- employers and landlords conducting Right to Work or Right to Rent checks
- Immigration Enforcement (IE) work in the community

Allegations from members of the public

10.2 The Receipt, Evaluation and Development (RED) team is responsible for administering the system that enables members of the public to report allegations of immigration abuse to the Home Office. Between 1 January 2024 and 30 June 2025, the RED team recorded 42,848 ‘No permission to stay in the UK’ allegations received from members of the public.

10.3 The RED team’s main function is to triage the allegations using the Intelligence Handling Model, which categorises incoming intelligence against three criteria: threat or risk; credibility; and priority. All allegations must be given a harm grading assessment within 24 hours:

- red is high harm, such as threats to kill and terrorism, and these allegations will be handled immediately
- amber relates to time-sensitive allegations and must be handled within 48 hours
- green is standard intelligence that is not considered high harm or time sensitive and must be handled within 30 days
- white is for non-immigration crime

- 10.4** A minimum of three ‘POLE’ (Person/Business, Object, Location, Event) criteria is required to enable further action. Allegations with limited information, which do not meet this requirement, will be closed on the Intelligence Management System⁷² and recorded as “insufficient information to progress further”.
- 10.5** RED team staff described the quality of the allegations as variable, with many containing insufficient information to be progressed. The allegations may concern individuals suspected of overstaying or illegal entrants, though the person making the allegation may not know the true immigration status and may not refer specifically to either.
- 10.6** Staff told inspectors that allegations relating to overstayers usually refer to a residential address. For enforcement action, this was considered problematic for two reasons. Firstly, any enforcement action requires a warrant to

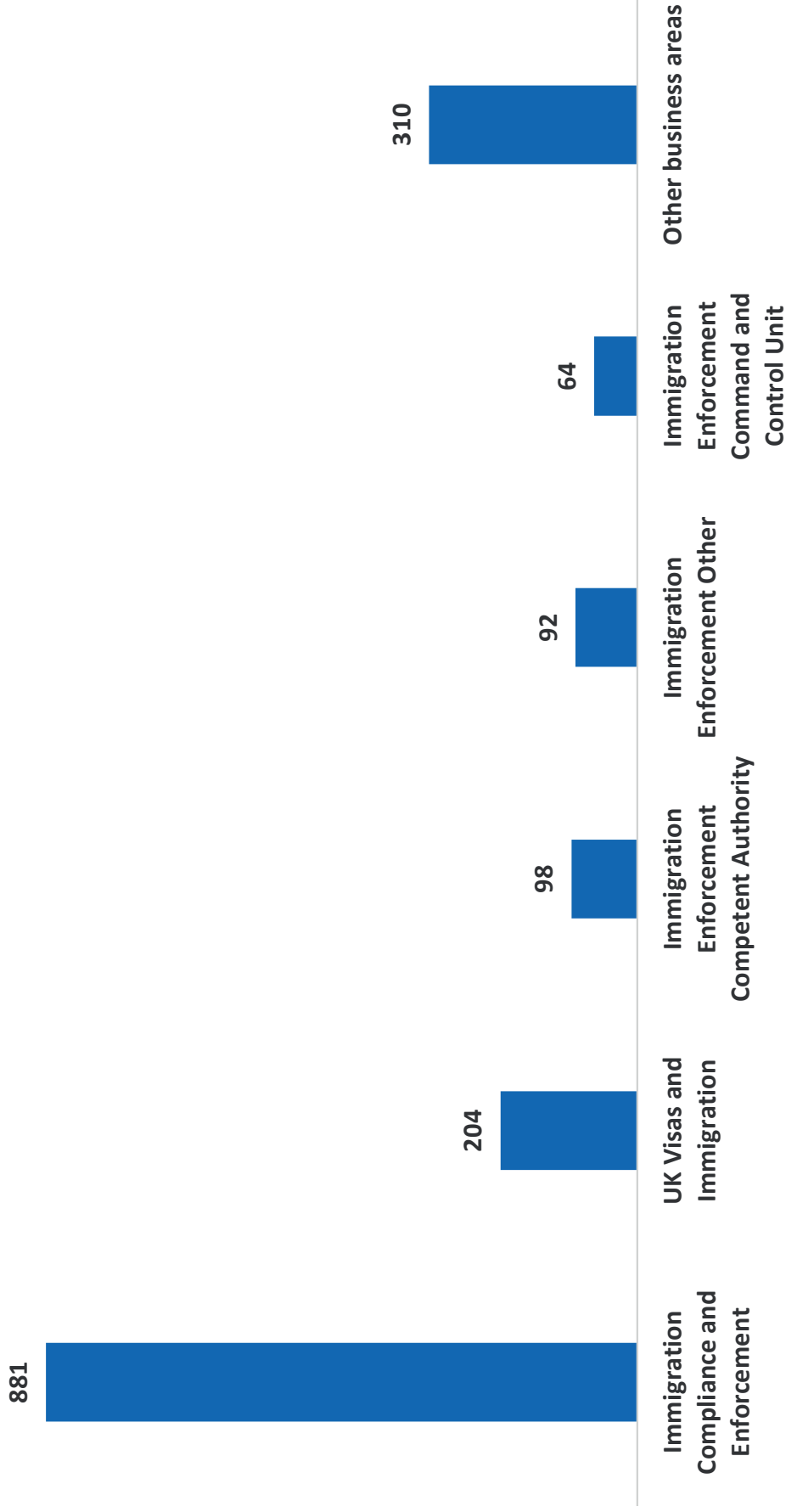
72 The Intelligence Management System (IMS) is a database used to record information (normally referred to as ‘allegations’) received from members of the public, Crimestoppers, other government agencies, and referrals from members of staff. As well as providing a record of each allegation, IMS has workflow functionality so that information/intelligence can be tasked to different units and tracked to completion.

enter a residential property. Secondly, intelligence becomes outdated quickly, with subjects frequently changing address.

- 10.7** The RED team also receive and review intelligence reports from Home Office staff, from other government departments, such as the Department for Work and Pensions, and from the police. Additionally, they receive between 50 and 60 reports a day via Crimestoppers.⁷³
- 10.8** Between 1 January 2024 and 30 June 2025, the RED team received 1,649 ‘No permission to stay in the UK’ allegations from within the Home Office. See Figure 18.

73 Crimestoppers is a national charity that provides an anonymous telephone line that members of the public can use to report suspected criminal activity. Crimestoppers acts independently of the police and immigration authorities and aims to empower communities to help prevent crime.

Figure 18: The number of all ‘No permission to stay in the UK’ allegations received by the RED team from Home Office business areas (1 January 2024 to 30 June 2025)



10.9 Once triaged, most actionable allegations are referred to the local Operational Intelligence Units (OIUs), which are responsible for tasking Immigration Compliance and Enforcement (ICE) teams. OIU managers told inspectors that illegal working operations had traditionally been prioritised above overstaying. However, some intelligence staff did anticipate that the change of priority for overstayers from priority D to priority B within the IE Interim Control Strategy might lead to increased prioritisation of overstayers by OIUs in the future.

Immigration Compliance and Enforcement visits

10.10 Local ICE teams are responsible for conducting enforcement visits to apprehend immigration offenders. They receive referrals from OIUs, National Returns Progression Command, Foreign National Offenders Returns Command, and from self-generated intelligence packages. Priorities are decided weekly by the regional Tasking and Coordination Group (TCG) and are informed by regional and national requirements.

10.11 Staff in ICE teams told inspectors that they rarely prioritised overstayers and instead focused their attention on illegal workers and Operation

Mosswood⁷⁴ nationalities, which were more likely to result in detentions and removals. Team members said that they frequently encountered overstayers during illegal working and residential visits. They told inspectors that “most overstayers are engaged in illegal working”, and that 20% of their workload involved individuals who had overstayed and subsequently committed other immigration offences.

10.12 An ICE manager told inspectors:

“At some point, most people we deal with will have overstayed, entered illegally, or worked in breach. Someone can be one of those things at different stages. It is very difficult to separate the different categories of immigration breach.”

10.13 A senior manager said that the lack of a current address or ‘financial footprint’ made it difficult to use residential visits to target overstayers. Illegal working visits to places of employment were a more effective use of resource and could result in the arrest of multiple overstayers.

10.14 ICE team members told inspectors that previously unidentified overstayers were likely to claim

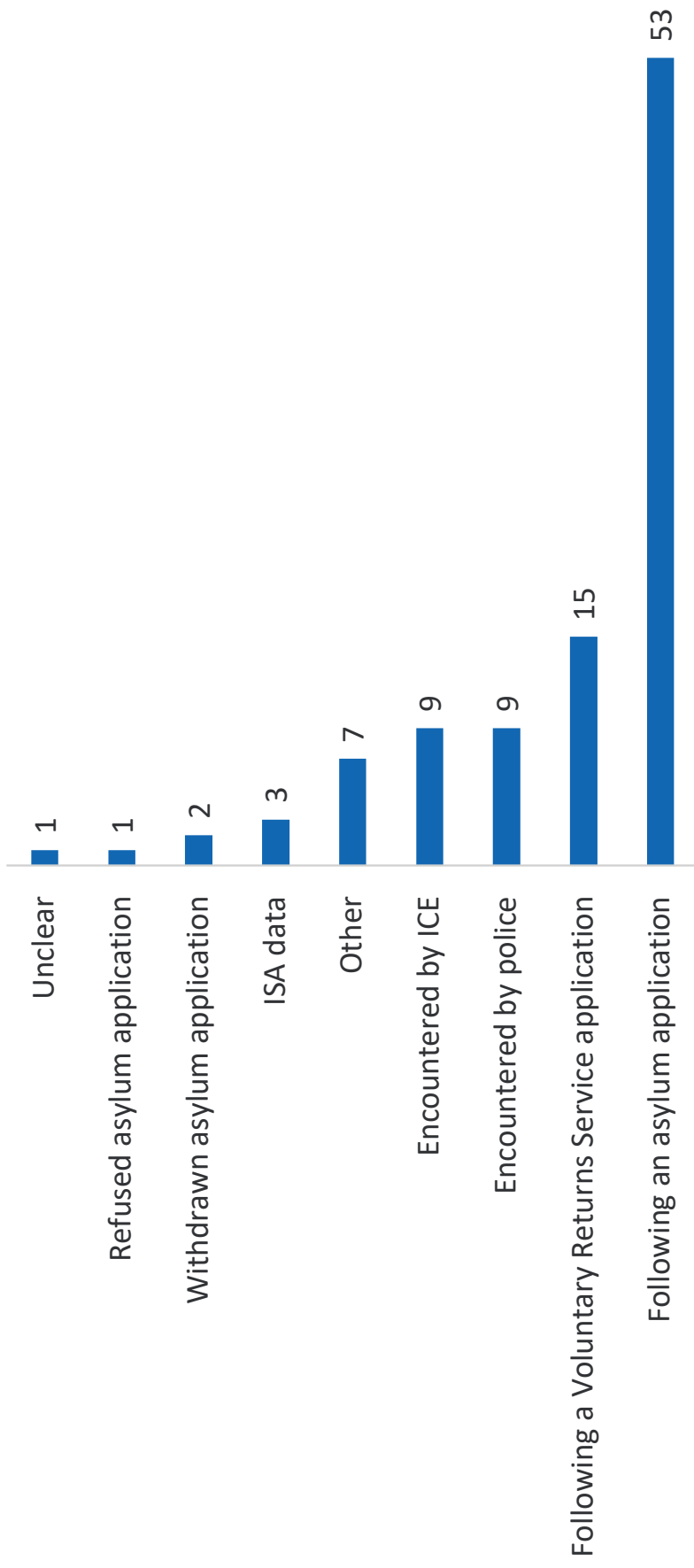
74 Operation Mosswood is an ongoing Immigration Enforcement operation that prioritises the detention and removal of nationals of certain countries to where removal is considered more straightforward.

asylum during their first contact with ICE team officers, halting immediate attempts to detain or remove them. The Home Office provided data which showed that, between 1 January 2024 and 30 June 2025, of the 40,860 overstayers served with a Notice of Liability to Remove (NOL), 5,522 (13.5%) subsequently claimed asylum.⁷⁵

10.15 Some overstayers were identified as such only because they claimed asylum. For example, in 53 of the sample of 100 overstayer cases examined by inspectors, the trigger for their identification by the Home Office was an asylum application. A further 32 claimed asylum after being served a NOL. See Figure 19.

75 An unknown number of the 40,860 overstayers had also claimed asylum prior to receiving a NOL.

Figure 19: Triggers for the service of the NOL letter in the sample of 100 cases examined by inspectors



Border Force

10.16 Immigration Enforcement and Border Force Officers may encounter people holding either valid or expired genuine UK visas leaving the UK concealed in vehicles. In 2023, there were more than 300 outbound encounters of UK visa holders and overstayers attempting to leave the UK clandestinely via the Common Travel Area (CTA) or via the Schengen Area. As well as demonstrating that some overstayers attempt to evade immigration controls, this highlights one weakness with departure data.

Voluntary Returns Service

10.17 The Voluntary Returns Service (VRS) assists migrants without permission to remain in the UK to return to their countries of origin. It plays a primary role in removing overstayers from the UK. For many overstayers, an application to engage with the VRS is the first contact that they have with the Home Office. Inspectors found that 15 of the sample of 100 overstay cases they examined were first identified by the Home Office in this way.

10.18 GOV.UK provides guidance on eligibility for the VRS, which is usually limited to those who:⁷⁶

76 GOV.UK, 'Get help to return home if you're a migrant in the UK'. <https://www.gov.uk/return-home-voluntarily>

- are in the UK illegally or have overstayed their visa or permission to stay
- have withdrawn, or want to withdraw, their application to stay in the UK
- have made a claim for asylum in the UK
- have a letter from the Home Office confirming that they are a victim of modern slavery

10.19 If eligible, the VRS can help applicants obtain travel documents, pay for travel tickets, and, in some circumstances, provide financial support of up to £3,000 to aid with reintegration in the country of return.

10.20 However, the VRS might inadvertently inflate figures of identified overstayers. For example, an asylum claimant who applies for the VRS is required to withdraw their asylum claim. It is only upon withdrawal of the claim that the Home Office deems them to be an overstayer. Policy officers described this process to inspectors as necessary to allow the service of papers, without which the case could not progress.

Cancellation of visas

10.21 A Work or Student visa sponsor is required to inform the Home Office via the Sponsor Management System portal when a visa holder fails to comply with the conditions of their visa,

such as when a student fails to attend their course, or a worker fails to attend their employment. The visa is then considered for cancellation, and Atlas is updated to reflect a 'cancellation consideration'.

- 10.22** Teams responsible for cancelling visas told inspectors that there was a delay of two to four months for Student visas to be cancelled, with a Work in Progress queue of 24,000 cases as of 19 June 2025. As of the same date, the Work visa cancellation delay was approximately seven months, with a queue of approximately 89,000 cases. Both queues included individuals reported as non-compliant by sponsors and those whose sponsors had subsequently lost their sponsorship licence. In the latter case, individuals were entitled to a 60-day period of grace to find an alternative place of study or work.
- 10.23** Staff in the cancellation teams told inspectors that many of the cases they dealt with were victims of exploitation and fraud, with some individuals having paid agents up to £35,000 to secure a Work visa.
- 10.24** Where an individual claims asylum in such circumstances, they are entitled to leave under section 3C of the Immigration Act 1971, which enables them to continue in employment while awaiting an asylum decision.

- 10.25** The result of the cancellation backlog is that a large cohort of sponsored students and workers are able to remain in the UK, often in employment, for many months until their visas are cancelled. ICE team staff told inspectors that they frequently encountered such workers and students during their operational activity, and that they sometimes cancelled visas themselves.
- 10.26** ICE team managers explained that ICE officers were able to cancel visas where operational evidence suggested that visa holders were in breach of their conditions. Such cancellations have to be authorised by a Chief Immigration Officer or higher. However, there is a high burden of proof in such cases, and teams were regularly subject to time-consuming legal challenges as a result of the visa cancellations.

Multi-agency operations

- 10.27** The Home Office was unable to provide data for the number of overstayers identified through multi-agency working with the police or other government departments. However, the NCCU offered some useful insight into how such identifications take place.

National Command and Control Unit

- 10.28** The NCCU provides a 24/7 telephone referral service that enables police forces, the National

Crime Agency, His Majesty's Revenue and Customs (HMRC), and the Gangmasters and Labour Abuse Authority to check the immigration status of individuals they encounter.

- 10.29** NCCU staff told inspectors that they manage more than 22,000 calls per month, the majority received from police forces. Police officers can call NCCU for a status check on people who have been arrested or have been stopped on suspicion of having committed an offence. Police officers equipped with handheld fingerprint devices can send through an individual's biometric information to assist with these checks.
- 10.30** Staff told inspectors that 6,983 overstayers were identified in this way in the year ending 31 March 2025. Once identified, NCCU refers cases to the relevant ICE team for further action. If the subject of the enquiry is not already under arrest, NCCU can authorise their detention under immigration powers.
- 10.31** NCCU staff were critical of Atlas (the principal system used when conducting status checks). They said it slowed them down in providing an answer to police. According to staff in NCCU, the average time taken to answer police enquiries was currently 21 seconds, with average call handling times of seven minutes.

- 10.32** Staff also told inspectors that police officers were not mandated to call NCCU with immigration queries and there were still police forces in the UK that rarely made use of the service. Despite much awareness-raising activity from NCCU, staff felt that more was required and that greater awareness would lead to the identification of increased numbers of immigration offenders, including overstayers.
- 10.33** The current rates of compliance for each police force are calculated by comparing foreign national arrest data received from the ACRO Criminal Records Office against the volume of calls received from that force's custody suites by NCCU. However, inspectors were told that a more accurate system was being introduced from September 2025, which will cross-reference police custody data with NCCU data using the custody reference number. This will allow missed referrals to be identified and followed up, where appropriate, by ICE teams and IE removals and casework teams.
- 10.34** Police referrals play an important role in identifying overstayers. Inspectors found that nine of the sample of 100 overstay cases they examined had been identified following a police encounter.
- 10.35** To encourage more referrals from police, the Home Office is engaged in a 'rejuvenation' of its communication strategy with all police force

custody teams. This work, which is supported by the National Police Chiefs' Council custody lead, is directed at 'footfall' forces (those police forces dealing with high numbers of foreign nationals) and 'focus' forces (those who have lower compliance rates). It includes providing feedback, merchandise, training, and the use of digital resources.

Right to Work and Right to Rent checks

- 10.36** Under the Immigration, Asylum and Nationality Act of 2006, all employers and businesses in the UK have a legal duty to prevent illegal working and to report suspected illegal working to the Home Office. Meanwhile, the Immigration Act of 2014 places a legal duty on landlords and their letting agents not to enter a tenancy with a tenant who is disqualified from renting property by virtue of their immigration status. An individual who has overstayed their visa with no further leave to remain will be unable to prove their right to work or rent and therefore should not be employed or permitted to enter into a tenancy agreement.
- 10.37** The 'Code of Practice on preventing illegal working: Right to Work Scheme for employers' guidance sets out the prescribed checks that employers should conduct to avoid a civil penalty

in the event of illegal working.⁷⁷ Likewise, the ‘Code of practice on right to rent: Right to Rent Scheme for landlords and their agents’ provides guidance for landlords, homeowners and letting agents.⁷⁸ Both are required to conduct either a manual check of the individual’s documentation or to use the Home Office online Right to Work or Right to Rent checking service. By doing so, employers and landlords can establish a statutory excuse against liability for a civil penalty. Further guidance on how to conduct the checks is available on GOV.UK: ‘Right to work checks: An employer’s guide’ and ‘Check a tenant’s right to rent in England: use their share code’.^{79,80}

77 Home Office ‘Illegal working penalties: codes of practice for employers’ (updated 20 December 2024). <https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers>

78 Home Office: Code of Practice on right to rent: Right to Rent Scheme for landlords and their agents (updated 27 March 2024). <https://www.gov.uk/government/publications/right-to-rent-landlords-code-of-practice>

79 Home Office, ‘Right to work checks: an employer’s guide’ (updated 31 July 2025). <https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

80 GOV.UK, ‘Check a tenant’s right to rent in England: use their share code’. <https://www.gov.uk/view-right-to-rent>

10.38 The Right to Work and Right to Rent schemes enable employers and landlords to report instances of suspected illegal working in their workforce, or of an existing or would-be tenant who does not have the right to rent.

10.39 Between 1 January 2024 and 30 June 2025, the Home Office received:

- 85 Right to Work scheme referrals from employers wishing to report suspected illegal working in their workforce
- 3,008 Right to Rent scheme referrals from landlords and letting agents wishing to report a suspected tenant without a right to rent

Immigration Enforcement work in the community

10.40 The National Community Engagement Team (NCET) engages with communities on behalf of IE. Staff from the team told inspectors that they have “a strategic remit to inform and involve diaspora communities with IE priorities”. However, they said they were not involved directly in compliance work and do not develop intelligence or feed information about individual cases of non-compliance back to IE colleagues.

10.41 ICE teams are also involved in community engagement, sometimes attending National

Community Engagement Team events. Additionally, Field Intelligence Officers consult with employers and check staff lists to ensure that employees have the right to work, attend visits with ICE teams, and assist in multi-agency operations.

Overstayers identified by local authorities

- 10.42** In response to the ICIBI's call for evidence, the council for a large English city submitted nine case studies illustrating how overstayers came to its attention, and the pressures exerted on its services by periods of extended overstaying.
- 10.43** The case studies described individuals from a number of countries who had arrived in the UK through different visa routes. One had overstayed in the UK for more than 20 years. The council said it had seen other cases where individuals had overstayed between 10 and 15 years.
- 10.44** Some overstayers came to the council's attention following a period of ill health. Following hospital stays, these individuals were unable to be discharged due to a lack of suitable accommodation. A local charity had supported them to claim asylum, allowing them to enter asylum accommodation. The council said that many overstayers rely on the support of voluntary organisations for their basic needs and that

charities often encouraged overstayers to claim asylum as the only available avenue for resolving their immigration status. However, the asylum claims were usually refused, at which point the council may be required to step in. For example, in one of the case studies the individual was provided with council-supported accommodation after six years in asylum accommodation.

10.45 Further case studies from the same council referred to illegal working, modern slavery, homelessness, and destitution.

Home Office internal feedback processes to prevent and identify overstayers

10.46 Inspectors found limited evidence of feedback loops regarding overstayers between Visa, Status and Information Services (VSI) and IE. VSI has processes in place to establish whether repeat visa applicants have previously complied with their visa conditions. But, in the absence of a further application there is little feedback that can be provided to visa decision makers (DMs) to help inform future decisions or identify patterns and trends in the overstaying population.

10.47 Policy officials told inspectors that this lack of feedback about visa decision outcomes means that visa decision making was “not always fully

informed... and not considerate of downstream consequences.”

- 10.48** Teams within IE saw this lack of feedback as a fundamental weakness. Staff in OIU and RED teams told inspectors that they had “minimal contact” with VSI and that the Casework Intelligence team prioritised organised abuse of the visa system rather than cases of overstaying.
- 10.49** An ICE team manager said that their teams regularly submitted intelligence referrals and debrief information on Pronto,⁸¹ and always updated Atlas about overstayers (which in turn leads to an update on the Border Crossing (BX) tool), but they doubted that any of this information was accessible to teams within VSI. This was confirmed by VSI managers, who told inspectors of only one scenario in which IE feedback about an overstayer would come to their attention – when a previously identified overstayer acted as a sponsor for the visa application of a third party.
- 10.50** VSI DMs do receive some feedback, predominantly about asylum cases, through the weekly Immigration Asylum & Biometric System report and the Central Reference System (CRS)

81 Pronto (Police reporting and notebook organiser) is an Immigration Enforcement (IE) app that assists with the planning, recording and conduct of events resulting from an IE visit.

Dashboard, and such cases are analysed and discussed with DMs.

- 10.51** From the sample of 100 overstayer cases examined by inspectors, only 56 CRS records had been updated to reflect the immigration breach, even though all 100 had been served with a NOL. This means that reviewing an applicant's previous visa applications on CRS, which is a compulsory Operating Mandate check for visa DMs, is of limited use in ascertaining whether there are previous periods of overstaying.
- 10.52** VSI managers said that it would be useful to receive information about overstayers and acknowledged that this could assist DMs with risk and harm awareness.
- 10.53** Where overstayers are identified as a result of visa applicant checks, the Special Handling Unit within the VSI Visit visa team disseminates this information to IE using an 'ICE form'. For example, where an applicant applies to visit a family member in the UK, but Home Office records reveal the family member to be an overstayer.
- 10.54** VSI managers told inspectors that they also check Home Office systems to see if some individuals (particularly children under 18) have left the UK. An example was provided of a child who had entered the UK with their parents but was later left in the care of relatives after the parents returned

home. This situation triggered a safeguarding referral to the local ICE team. Managers noted that such cases were helping to raise awareness of overstaying among visa DMs and were strengthening collaboration between Visa, Status and Information Services, and Immigration Enforcement.

Annex A: ICIBI letter to the Second Permanent Secretary, 3 July 2025

Simon Ridley
Second Permanent Secretary
Home Office
2 Marsham Street
London SW1P 4DF



3 July 2025

Dear Simon,

Quality Management across the Migration and Borders System

As you are aware, I have been concerned for some time about the efficiency and effectiveness of quality assurance (QA) policies and practice across the Migration and Borders System. I have drawn attention to this in numerous inspection reports and in my annual reports. The current inspection of decision quality in asylum casework is looking at quality management more broadly, including the role of training, guidance, supervision, and learning, but it will obviously also examine the QA regime. My reason for writing now is to encourage you to consider whether the existing QA regime is fit for purpose ahead of the completion of that inspection.

You will recall that in my report on the management of fee waiver applications, published in January, I recommended that the Home Office should:

“Create a more exacting ‘quality score marking’ system for use with fee waiver caseworkers that reinforces the importance of eliminating all errors, giving more weight than hitherto to correct spelling, grammar and content of correspondence, alongside correct decision outcomes. The same system, operating to the same rules, should be used by all three fee waiver functions.”

I prefaced my recommendations about fee waivers by noting that the Home Office should “reflect on whether the substance of [the report’s] recommendations is relevant to other functions within the Migration and Borders System and to adapt and implement them where this is the case.”

The recommendation was accepted, with an implementation date of 31 October 2025 and with the following supporting narrative:

“We have created two casework hubs to improve focus on and add greater control of cases to build expertise, identify efficiencies and provide consistency of decision making for our customers. The AHRO quality assurance team will work with the Passports, Citizenship & Civil Registration (PCCR) and Visas, Status & Information Services (VSIS) operational and quality

assurance teams and the Central Customer Operations Support Service (COSS) assurance team to undertake further work to bring consistency and improve reporting mechanisms including fee waiver considerations and quality markings and standards.”

It was not entirely clear to me from the above whether the full extent of my concerns, the evidence for which was set out in detail in the body of the report, had been understood, or what the “further work” comprised. Equally, since my report had been highly critical of the approach taken to QA, it was not obvious that the QA teams, which with the Performance Assurance Improvement and Risk Team (PAIR) had overseen this, were best equipped to lead what should be a fundamental re-think.

The latest update from the recommendations’ tracker (dated 25 June) has increased my fear that the recommendation has either been misunderstood or consciously diluted. Either way, it does not seem as though things were moving at pace:

“There has been an agreement with PAIR (The Performance Assurance Improvement and Risk Team) to develop a new Management Information (MI) Tool to be used alongside the existing Quality Assurance Tools across Fee Waiver areas. An initial meeting with the working group has been scheduled for 17/06/2025. Monthly meetings with the relevant stakeholders to discuss progress are also taking place.”

Neither the original response nor the update gives any indication of what if any consideration has been given to the wider relevance of this recommendation. To be absolutely clear, I am not suggesting that a QA regime based on 100% checking of decisions made by caseworkers who have yet to be ‘signed off’ as fully competent, together with dip sampling of the decisions made by those who have been signed off, cannot be effective. However, this depends on setting the right standards and expectations. The number of consecutive, error-free decisions required before someone is signed off should not be susceptible to resource pressures. Spelling and grammatical errors should not be accepted as of only minor importance, as this will undermine efforts to improve quality. Dip-sampling needs to be targeted so that it provides assurance of both overall decision quality and individual performance, and it needs to happen before decision letters are sent out, otherwise it is putting the department’s interests above those of the customer (I understand the argument that this will delay decisions, but given the already extended nature of most processes I think the trade-off is worth it, especially if it reduces reconsiderations and appeals).

I am copying this letter to Joanna Rowland. I had been due to meet Jo this week and would have raised this with her, but as it affects the Migration and Borders System as a whole it is more appropriate that I address these concerns to you.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. V. Gold'.

Independent Chief Inspector of Borders and Immigration

cc: Joanna Rowland



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Annex B: 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 C: 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 reviews 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)

Acknowledgements

The inspection team is grateful to the Home Office for its co-operation and assistance during this inspection and for the contributions from the staff who participated. We are also grateful to the stakeholders who contributed.

Inspection team members


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