



# **An inspection of the Handling of Complaints and MP's Correspondence by the Home Office Borders, Immigration and Citizenship System (BICS)**

**February – May 2019**

**David Bolt**

Independent Chief Inspector of  
Borders and Immigration

# **An inspection of the Handling of Complaints and MP's Correspondence by the Home Office Borders, Immigration and Citizenship System (BICS)**

**February – May 2019**



© Crown copyright 2020

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at [www.gov.uk/official-documents](https://www.gov.uk/official-documents)

This publication is also available at [www.gov.uk/ICIBI](https://www.gov.uk/ICIBI)

Any enquiries regarding this publication should be sent to us at

Independent Chief Inspector of  
Borders and Immigration,  
5th Floor, Globe House,  
89 Eccleston Square,  
London SW1V 1PN  
United Kingdom

ISBN 978-1-5286-1540-2

CCS0719595734 07/20

Printed on paper containing 75% recycled fibre content minimum.

Printed in the UK by the APS Group on behalf of the Controller of Her Majesty's Stationery Office.

## **Our purpose**

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

All Independent Chief Inspector of Borders and Immigration inspection reports can be found at [www.gov.uk/ICIBI](http://www.gov.uk/ICIBI)

**Email us:** [chiefinspector@icibi.gov.uk](mailto:chiefinspector@icibi.gov.uk)

**Write to us:** Independent Chief Inspector  
of Borders and Immigration  
5th Floor, Globe House  
89 Eccleston Square  
London, SW1V 1PN  
United Kingdom



# Contents

Foreword	2
1. Scope and Purpose	3
2. Methodology	5
3. Summary of conclusions	6
4. Recommendations	9
5. Background	10
6. Inspection findings	19
7. Correspondence from Members of Parliament	40
Annex A: Role and remit of the Independent Chief Inspector	48
Annex B: Expectations of the Independent Chief Inspector	50
Annex C: Evidence received from the Parliamentary and Health Service Ombudsman	52
Annex D: Recommendations made by Liberty	56
Acknowledgements	57

# Foreword

In setting out the particular areas that the Independent Chief Inspector shall consider and make recommendations about, the UK Borders Act 2007 specifies “the handling of complaints”. Where relevant, ICIBI includes complaint handling as a standing item in inspections. More generally, the inspectorate regularly receives correspondence from individuals expressing their dissatisfaction with their treatment by the Home Office, which is passed on to the latter to respond, where appropriate, and stakeholders also point out issues both spontaneously and in response to a specific call for evidence.

In 2015, I looked at the BICS complaints handling system as a whole. I made eight recommendations for improvements and, in 2017, revisited these to see what progress had been made. This latest inspection looked at them again, some two years on, and also at correspondence from the Home Office in response to letters from Members of Parliament on behalf of their constituents, which had featured in the original inspection.

Based on my findings, I have recommended that the Home Office revisits each of the eight recommendations and produces an updated response to each. The Home Office believes that this fails to acknowledge the improvements it has made in processes, response times, quality and record keeping. I disagree, and while this inspection found that there had been improvements in the first and last of these, it also found that the service standard of responding to 95% of complaints within 20-working days was routinely missed and that quality assurance was either retrospective, absent or achieved at the expense of timeliness.

The Home Office was also concerned about drawing firm conclusions from the small number of respondents to the call for evidence, including just a handful of MPs. I agree, although as I have mentioned, this was only one part of the evidence base. For this reason, I have recommended that the Home Office carries out a new survey of MPs. It might also usefully consider how to capture customer feedback more systematically.

My third recommendation is about “ownership” for BICS complaints. This has been something of a theme in recent inspection reports, which have raised concerns about the fragmented nature of BICS business. In the case of complaints, apart from ensuring the consistency and quality of responses, the challenge is to ensure that any high-risk and cross-BICS themes or issues are quickly identified and addressed.

Finally, I have recommended greater transparency regarding the nature of the complaints received and, in particular, the lessons learned and the changes and improvements made as a result. Done well, this could go a long way to demonstrating that the Home Office takes complaints seriously and is truly as “customer focused” as it claims to be.

My report was sent to the Home Secretary on 4 July 2019.

**David Bolt**  
**Independent Chief Inspector of Borders and Immigration**

# 1. Scope and Purpose

- 1.1** This inspection followed up on two earlier inspections of complaints handling by the Home Office's Borders, Immigration and Citizenship System (BICS): 'An inspection of the Handling of Complaints and MPs' Correspondence', published on 1 March 2016, and 'A re-inspection of the complaints handling process', published on 12 July 2017. It also drew on the findings and recommendations from other inspections where complaints had featured.
- 1.2** Like the earlier inspections, this inspection looked at the handling of complaints received from members of the public relating to the service<sup>1</sup> provided by UK Visas and Immigration (UKVI), Immigration Enforcement (IE) and Border Force (BF), and to alleged 'minor misconduct' by staff.<sup>2</sup> It also looked at the handling of complaints from individuals detained in an Immigration Removal Centre. Finally, the inspection looked at the handling of correspondence from Members of Parliament pursuing complaints or raising issues on behalf of their constituents.
- 1.3** Inspectors did not look at allegations of 'serious misconduct', which are investigated separately by the Home Office's Professional Standards Unit.<sup>3 4</sup>
- 1.4** In order to assess the efficiency and effectiveness of the Home Office's handling of complaints and MP's correspondence, the inspection examined whether these:
- were recorded correctly
  - were investigated effectively

---

1 'Complaints guidance for UK Visas and Immigration, Immigration Enforcement and Border Force' notes that service complaints "can relate to the actual service provided and/or the day-to-day operational policies behind them" and that they are usually categorised and recorded under headings such as: delay (for example, in delivery of a service); administrative/process error (failings in the process, administrative error, poor service or failure to meet service standards); poor communication (failure to keep customers informed, failure to answer correspondence, return calls etc); wrong information (provision of poor, misleading, inadequate or incorrect advice); lost documents (for example, passports or birth certificates submitted by customers that have been mislaid); queues; damage; customer care – physical environment (complaints relating to tangible, physical aspects of the service such as access, up to date equipment and accommodation as well as the ease and convenience with which it can be used); customer care – availability of service (loss of access to services, for example, IT or other equipment breakdown); customer care – provision for minors (failure to take the particular needs of children into account); customer care – complaint handling (failure to respond to a complaint or dissatisfaction with the response).

2 Complaints about the professional conduct of Home Office staff and/or contactors that are not serious enough to warrant a formal investigation. If substantiated, they would not normally lead to discipline (misconduct) proceedings. Home Office guidance gives some examples: incivility, brusqueness, isolated instances of bad language, an officer's refusal to identify themselves when asked, poor attitude, for example, being unhelpful, inattentive or obstructive.

3 Serious misconduct complaints, if substantiated, could lead to serious or gross misconduct proceedings and formal management action, such as written warnings, dismissal or other penalty. Home Office guidance refers to: criminal assault, criminal sexual assault, criminal theft, criminal fraud or corruption, racism or other discrimination, unfair treatment (for example, harassment), other unprofessional conduct (including any behaviour likely to bring the Home Office into disrepute, or which casts doubt on a person's honesty, integrity or suitability to work for the Home Office).

4 Complaints made by immigration detainees about healthcare in Immigration Removal Centres (IRC) were also out of scope as they often contain medically confidential material and require clinical knowledge to determine whether they were effectively addressed.



- received a response that
  - was within the published service standard
  - was factually accurate
  - was written clearly and without errors
  - answered all of the substantive points raised
  - offered an appropriate remedy
- were analysed and used to improve performance

**1.5** The report is structured around the eight recommendations from the original inspection, six of which were accepted fully and two partially, and repeats the findings from the re-inspection. This is designed to show where the Home Office's handling of complaints and MP's correspondence has improved and where it is still falling short or has deteriorated.

## 2. Methodology

### 2.1 Between February and May 2019, inspectors:

- reviewed the management information in relation to complaints provided by each of the BICS directorates
- reviewed Home Office published guidance about complaints and complaint handling and the internal guidance (Standard Operating Procedures) in place for BICS staff, including details of the processes for quality assuring the responses to complaints
- published a 'call for evidence' on the ICIBI website, inviting anyone with relevant knowledge or experience of BICS complaints handling to write with their evidence
- reviewed other evidence received by ICIBI in relation to the handling of complaints by BICS, both in the course of other inspections and spontaneously
- examined 90 case files recorded on the Complaints Management System (CMS) between October and December 2018
- interviewed and held focus groups with managers and staff (51 in total) from the three complaints handling teams
- wrote to all Members of Parliament inviting views on what was working well and not so well in relation to the handling of MPs' correspondence and what improvements MPs would like to see

### 2.2 As in the 2016 complaints inspection and 2017 re-inspection, inspectors looked to the Parliamentary and Health Service Ombudsman's (PHSO) six key principles that public bodies should follow to help them to deliver first-class complaint handling to their customers as the benchmark against which to measure BICS:

- Getting it right
- Being customer-focused
- Being open and accountable
- Acting fairly and proportionately
- Putting things right
- Seeking continuous improvement

### 2.3 Inspectors also looked for evidence that BICS complaint handling met the ICIBI 'Expectations' (see Annex B).

### 3. Summary of conclusions

- 3.1** Complaints received by the Home Office's Borders, Immigration and Citizenship System (BICS) are managed by a number of different teams in different directorates. "Ownership" of complaints handling is therefore shared between BICS Directors General, as is responsibility for ensuring that mistakes are corrected, lessons are learned, and improvements are made.
- 3.2** There are sound arguments for organising complaints handling along functional lines, but it clearly makes it harder for BICS to ensure it is acting consistently and is identifying and tackling systemic issues.
- 3.3** There are two separate complaints handling teams that manage service and minor misconduct complaints relating to Border Force (the Border Force Correspondence Team (BFCT)) and to UK Visas and Immigration and Immigration Enforcement (UKVI Central Correspondence Team), the latter being much larger since it handles significantly larger volumes of complaints. These teams do not deal with serious misconduct complaints, which are investigated separately by the Home Office's Professional Standards Unit (PSU). Given that the investigation of serious misconduct requires certain skills (and may lead to a criminal prosecution), this separation of responsibilities appears sensible.
- 3.4** Similarly, there is a case for the Home Office handling the complaints process for individuals held in immigration detention separately as each Immigration Removal Centre (IRC) contractor ("supplier") is contractually responsible for responding to such complaints, while Immigration Enforcement's Detention Services Customer Service Unit's (DS CSU) role is to oversee the process.<sup>5</sup> However, this arrangement has led some to question the independence and rigour of investigations into detainees' complaints and whether they result in changes and improvements.
- 3.5** Meanwhile, correspondence from Members of Parliament (MPs), such as letters, emails or telephone calls made on behalf of their constituents, is managed by the MP's Account Management unit (MPAM). Organisationally, MPAM sits alongside but is separate from the UKVI Central Correspondence Team, although inspectors were told of recent efforts to bring the two closer, so that staff could be used for either function, as required, thereby providing greater resilience.
- 3.6** In 2015, ICIBI identified a number of process improvements that each of the BICS complaints handling teams needed to make to become more efficient, effective and consistent. The report contained eight recommendations. Six were "accepted" and two were "partially accepted". A re-inspection, carried out between January and March 2017, found that UKVI's Central Correspondence Team (CCT) and DS CSU had made significant changes to their processes in line with the recommendations and, as a result, most of the latter could be "Closed". But, Border

---

<sup>5</sup> The question of how the Home Secretary can get the necessary assurances about immigration functions delivered under contract by a commercial supplier is explored further in the ICIBI's inspection of the Home Office's 'Adults at Risk' (in detention) policy which ran in parallel with the Complaints inspection.

Force was found to have a good deal more work to do to bring its complaints handling up to the required performance level.

- 3.7** However, the current inspection found that the earlier process improvements had not led to a sustained improvement in performance. Consequently, each area now needed to revisit the original recommendations, take stock, and determine how it was going to raise and sustain its performance.
- 3.8** This inspection has identified a number of important “housekeeping” issues for each area. These include reviewing and updating Standard Operating Procedures (SOPs) and using the Complaints Management System (CMS) to ensure there is a full, accurate and retrievable record of each complaint, how it has been handled, and the response.
- 3.9** However, above all, each area needs to improve the timeliness and quality of its responses, since these are what matter most to its “customers”. The BICS complaint handling teams have their own detailed processes, but they all share the same Customer Service Standard, which reflects the Cabinet Office expectation that all government departments should provide a substantive response to complaints within 20-working days of receipt. The BICS target is for 95% of all complaints to receive a response within this timeframe, but it seems to be doing little to ensure that this is achieved.
- 3.10** During the 18 months from 2017 Q2 to 2018 Q3, CCT and DS CSU failed to meet the service standard for both service and minor misconduct complaints in most quarters. Meanwhile, at the time of this inspection, BFCT had never met it, nor did it have any plan or intention to do so, believing that the service standard was unachievable for Border Force, and was accepted as such.
- 3.11** In 2015, the inspection found that the quality and timeliness of responses provided to MPs had improved significantly since 2010 when this had last been inspected. It noted that, having failed to meet the service standard in any of the preceding four quarters, performance had consistently exceeded it between 2014 Q4 and 2015 Q2, which managers attributed to the introduction of shorter internal timescales for producing draft responses to emails and telephone calls, guidance on how to draft and rigorous quality checking.
- 3.12** The current inspection found that MPAM had met the Service Standard for all written correspondence in each month between July 2018 and January 2019, having not done so in the three preceding months. But, while performance in relation to responses signed by ministers (or by a BICS Director General) had improved significantly in the second half of 2018-19, as at January 2019 it still fell well short of the Service Standard.
- 3.13** BICS has agreed quality standards for responses to complaints. They must be free of grammatical and spelling errors, clear, factually accurate, customer-focused, and address all of the points raised in the complaint. This may still not satisfy the complainant, but an inaccurate and incomplete response will almost certainly increase their sense of grievance. An effective quality assurance regime is therefore essential.
- 3.14** Here, the complaint handling teams have adopted different approaches, opting either to quality check every response before it is sent to the complainant (BFCT and MPAM for written ministerial and DG responses) or to “dip sample” retrospectively (CCT and DS CSU). While the former approach is more reliable, it is also more time-consuming. Regardless of the approach, BICS needs to guard against seeing timeliness and quality (supported by a thorough and fair investigation, where required) as a “trade off”, since both are essential.

- 3.15** In the case of services provided by third parties under contract, it is reasonable that complaints should be addressed directly to the third party. However, the Home Office has a responsibility to ensure that the latter's standards of service and conduct at least match its own, and this and the identification and pursuit of necessary improvements would be better served if it specified more precisely how the third party should record complaints and responses.
- 3.16** The 90 sample records examined for this inspection suggested that although the complaints handling teams were, in most cases, using the Complaints Management System effectively to record the full history of each complaint, the automated acknowledgement email aside, there were still some inconsistencies and some errors, which pointed to the need for improvements in quality assurance. From the feedback received from MPs, the quality of the responses received from MPAM was mixed, and responses from the minister or a Director General were generally fuller and more helpful, but slow.
- 3.17** In summary, this inspection identified a number of performance issues with complaints handling across BICS, chiefly its routine failure to meet the published Customer Service Standard and the quality checking of its responses. Each complaint handling team would therefore benefit from taking a fresh look at its staffing levels, working practices and quality assurance measures.
- 3.18** However, beyond the more efficient and effective processing of complaints there is the larger question of whether BICS is learning from the complaints it receives and is improving.<sup>6</sup> Aside from failing its "customers", if it is not seen to be "getting it right", or where necessary, "putting it right", there is the potential for issues to escalate quickly and impact reputationally, politically, legally and financially. As such, these are BICS-level challenges and should not be "owned" by individual business areas or even directorates. From this inspection, and those in 2015 and 2017, it seems unlikely that meaningful and lasting improvements in the handling of complaints, and in tackling the underlying causes, will be achieved unless this is made explicit and prioritised accordingly.

---

<sup>6</sup> At the factual accuracy stage, the Home Office commented: "Border Force has a lessons-learned function. The Operational Assurance Directorate's Lessons Learned Team monitors a range of information, including complaints to identify emerging trends, issues and concerns, and reports them to the BICS Early Warning Working Group (EWWG). This group is a forum for raising, assessing and initiating investigation of possible and emerging cross-system issues and areas of concern." However, a parallel inspection of Border Force operations at Glasgow and Edinburgh Airports found that Border Force was unable to provide any explanation for a historic spike in complaints at Edinburgh, and was three months behind in collating monthly totals, suggesting that complaints are not closely and contemporaneously monitored.

## 4. Recommendations

### The Home Office should:

- 4.1** Revisit each of the recommendations from the 2015 inspection and produce an updated response to each, with an improvement plan for each BICS complaint handling team.
- 4.2** Nominate an overall BICS “owner” for complaints, with the responsibility (and sufficient authority) to ensure that each complaint handling team is regularly achieving the Customer Service Standard and producing responses that meet the quality standards. They should also ensure that any high-risk and cross-BICS themes or issues are quickly identified and addressed.
- 4.3** At least quarterly, publish (on GOV.UK and on Horizon<sup>7</sup>) the “lessons learned” from the complaints received by BICS in that period, and the changes and improvements made as a result.
- 4.4** Carry out a new survey of MPs in order to ensure that the structure and working practices of the MP Account Management (MPAM) team, in particular its capacity to engage effectively with MPs and their offices, is meeting the latter’s needs.

---

<sup>7</sup> Horizon is the Home Office intranet.

## 5. Background

### Borders, Immigration and Citizenship System Complaints Teams

- 5.1** At the time of the inspection (January to May 2019), the Borders, Immigration and Citizenship System (BICS) had three separate teams managing complaints.

### Border Force Correspondence Team

- 5.2** Border Force Correspondence Team (BFCT) manages complaints received about Border Force. BFCT sits under the Director General Border Force's Secretariat, where the Chief of Staff (Grade 6) has overall responsibility for it. Day to day management is provided by an Assistant Director (Grade 7), supported by a correspondence manager (Border Force Senior Officer)<sup>8</sup> and a team comprising three Border Force Higher Officers (BFHO)<sup>9</sup> and 11 Border Force Officers (BFO).<sup>10</sup> Seven of the BFOs are located in Dover, three in Croydon and one in Ipswich.

### Immigration Enforcement – Detention Services Customer Service Unit

- 5.3** Complaints<sup>11</sup> from individuals while in immigration detention are managed by the contractor ("supplier") responsible for the particular Immigration Removal Centre (IRC). The complaints process, which is set out in Detention Services Order 03/2015 'Handling complaints in immigration removal centres',<sup>12</sup> is overseen by the Detention Services Customer Service Unit (DS CSU) within Immigration Enforcement. Overall responsibility for DS CSU falls to a Grade 6. Day to day management is provided by an HEO, and the team comprises two full-time staff members, an Executive Officer (EO) and an Administrative Officer (AO).

### UK Visas and Immigration Central Correspondence Team

- 5.4** Complaints relating to UK Visas and Immigration and to Immigration Enforcement (excluding complaints received from immigration detainees) are managed by the UKVI Central Correspondence Team, which is made up of a Customer Contact Hub (CCH), which manages the receipt and allocation of complaints, and a Central Correspondence Team (CCT), which

---

<sup>8</sup> Equivalent to a Senior Executive Officer (SEO)

<sup>9</sup> Equivalent to a Higher Executive Officer (HEO)

<sup>10</sup> Equivalent to an Executive Officer (EO)

<sup>11</sup> This excludes complaints about healthcare (NHS commissioned services), which are handled under separate NHS complaints procedures, and complaints about: "Immigration status and applications to stay in the UK; Legislation; Government policy; Matters relating to disclosure of information under the Freedom of Information Act or Data Protection Act; Complaints outside the responsibility of the Home Office or IRC supplier; Complaints lodged by an MP which will be treated as Ministerial correspondence (other than serious misconduct allegations which will be referred to Home Office Professional Standards Unit (PSU) for investigation in order to inform any response from DS CSU); Requests for transfers (which will be handled by the Detainee, Escorting and Population Management Unit, DEPMU). Complaints about the refusal of a transfer request will be investigated by DEPMU." If a contractor receives a complaint that falls into one of these categories they are required to forward it to DS CSU.

<sup>12</sup> <https://www.gov.uk/government/publications/handling-complaints-in-immigration-removal-centres>

manages the responses. The combined CCH and CCT staffing breakdown (FTEs) is: half a Grade 7; one and a half Senior Executive Officers (SEO); nine HEOs; 26 EOs; 11 AOs; and one Administrative Assistant (AA).

## Complaints statistics

- 5.5** The Home Office records the number of complaints it receives, broken down into “service” complaints and “minor misconduct” complaints. It also records its performance in responding to these complaints, measured against the published service standard (95% to receive a substantive response within 20 days of receipt). The Home Office’s quarterly data for the 18 months between 2017 Q2 (April-June) and 2018 Q3 (July-September) is set out in Figures 1-3 below.

**Figure 1: Border Force complaints**

Complaints (Border Force)								
Calendar Quarters	Minor Misconduct: Number received	Minor Misconduct: Number due for response	Minor Misconduct: Number completed within service standard timescale	Minor Misconduct: Percentage completed within service standard timescale	Service Complaints: Number received	Service Complaints: Number due for response	Service Complaints: Number completed within service standard timescale	Service Complaints: Percentage completed within service standard timescale
2017 Q2	191	200	97	<b>49%</b>	816	791	537	<b>68%</b>
2017 Q3	244	222	138	<b>62%</b>	998	952	758	<b>80%</b>
2017 Q4	172	178	116	<b>65%</b>	746	834	657	<b>79%</b>
2018 Q1	181	177	118	<b>67%</b>	819	801	669	<b>84%</b>
2018 Q2	187	189	154	<b>81%</b>	827	792	711	<b>90%</b>
2018 Q3	182	196	151	<b>77%</b>	832	836	746	<b>89%</b>

**Figure 2: Detention Services complaints**

Complaints (Detention Service)								
Calendar Quarters	Minor Misconduct: Number received	Minor Misconduct: Number due for response	Minor Misconduct: Number completed within service standard timescale	Minor Misconduct: Percentage completed within service standard timescale	Service Complaints: Number received	Service Complaints: Number due for response	Service Complaints: Number completed within service standard timescale	Service Complaints: Percentage completed within service standard timescale
2017 Q2	96	101	98	<b>97%</b>	184	170	168	<b>99%</b>
2017 Q3	123	102	94	<b>92%</b>	209	209	200	<b>96%</b>
2017 Q4	145	166	135	<b>81%</b>	161	170	148	<b>87%</b>
2018 Q1	120	103	81	<b>79%</b>	204	166	150	<b>90%</b>
2018 Q2	107	118	97	<b>82%</b>	162	326	277	<b>85%</b>
2018 Q3	77	98	90	<b>92%</b>	115	127	120	<b>94%</b>



**Figure 3: UKVI and Immigration Enforcement complaints**

Complaints (UKV/IE)								
Calendar Quarters	Minor Misconduct: Number received	Minor Misconduct: Number due for response	Minor Misconduct: Number completed within service standard timescale	Minor Misconduct: Percentage completed within service standard timescale	Service Complaints: Number received	Service Complaints: Number due for response	Service Complaints: Number completed within service standard timescale	Service Complaints: Percentage completed within service standard timescale
2017 Q2	65	52	48	<b>92%</b>	5,168	5,025	4,801	<b>96%</b>
2017 Q3	79	70	53	<b>76%</b>	6,770	6,542	5,871	<b>90%</b>
2017 Q4	96	98	75	<b>77%</b>	4,666	5,233	4,652	<b>89%</b>
2018 Q1	125	112	92	<b>82%</b>	4,886	4,662	4,508	<b>97%</b>
2018 Q2	113	129	99	<b>77%</b>	5,155	4,958	4,536	<b>91%</b>
2018 Q3	108	85	37	<b>44%</b>	5,396	5,431	4,619	<b>85%</b>

## The 2016 inspection: overall findings and recommendations

- 5.6** Evidence gathering for ‘An inspection of the Handling of Complaints and MPs’ Correspondence’ ran from July to September 2015. The inspection report was completed and sent to the Home Secretary in January 2016 and published on 1 March 2016.
- 5.7** The inspection found evidence of good practice, in particular the “clear and simple” procedures for making a complaint, accessible online and via leaflets and posters, and the proactive and personalised service provided to MPs, which had improved the quality and timeliness of responses significantly since this had last been inspected (in 2010).<sup>13</sup>
- 5.8** However, the inspection also found areas where there was considerable room for improvement, specifically in relation to the inconsistent guidance available to complaint handlers, poor record-keeping, including tracking of complaints to ensure that they received a satisfactory and timely response, and failure to pursue all reasonable lines of enquiry in respect of minor misconduct complaints.
- 5.9** It resulted in eight recommendations, with the Home Office accepting six and partially accepting two:

### Recommendation 1 (“Accepted”)

Conduct a fundamental review of current guidance in relation to complaints handling and ensure that guidance is concise, unambiguous and practical, covering as a minimum:

- For customer-facing staff: the recording and reporting requirements for locally resolved complaints, for unresolved complaints and for complaints about other business areas
- For staff responding to written complaints about minor misconduct and service: the details to be included in the response regarding whether or not the complaint is upheld, what further steps (if any) will be taken and the option of requesting a review if not satisfied
- For staff responsible for maintaining the record of complaints: what needs to be recorded regarding whether or not the complaint is upheld, and the actions that have or will be taken, and by whom.

<sup>13</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/544786/Lessons-to-learn\\_The-UK-Border-Agency's-handling-of-complaints-and-MPs-correspondence\\_2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/544786/Lessons-to-learn_The-UK-Border-Agency's-handling-of-complaints-and-MPs-correspondence_2010.pdf)

## **Recommendation 2 (“Accepted”)**

Put in place sufficient management and/or quality assurance checks to ensure that guidance is being applied as intended, that the investigation of complaints is thorough and impartial, that responses deal with the substance of the complaint, and that remedies are appropriate.

## **Recommendation 3 (“Accepted”)**

Ensure that, where requested, the response to a request for a review of the handling of a complaint notifies the complainant of their options should they remain dissatisfied.

## **Recommendation 4 (“Accepted”)**

Review the stated aim to respond to all complaints within 20 working days and either take steps to ensure that it is achieved in 95% of cases, in line with the published service standard, or revise it to provide complainants with a realistic timescale for a response.

## **Recommendation 5 (“Accepted”)**

Ensure that complaints are acknowledged in line with guidance and, where it is likely that the 20-working day target for a substantive response will not be met, that complainants are notified and provided with regular updates until provided with a substantive response.

## **Recommendation 6 (“Partially accepted”)**

Ensure that the Complaints Management System (CMS)<sup>14</sup> is used to track the full history of a complaint from receipt to resolution, keeping the CMS record open until a substantive response has been provided to the complainant, recording accurately the details of any investigation and its findings, and retaining a copy of the original complaint and the response on the system.

## **Recommendation 7 (“Accepted”)**

Ensure that a thorough and fair investigation is conducted of all minor misconduct complaints, taking all reasonable steps, including checks against Home Office systems and records, to identify the subject of the complaint where this is in doubt.

## **Recommendation 8 (“Partially accepted”)**

In order to ensure compliance with guidance, greater consistency, and better quality assurance, retain ownership of complaints and responsibility for providing a substantive response within an appropriately resourced and dedicated correspondence team, which is empowered to require contributions from the relevant business area, where necessary.

# **The 2017 re-inspection**

- 5.10** Between January and March 2017, ‘A re-inspection of the complaints handling process’ examined the Home Office’s progress towards making the improvements it had committed to make in its formal response to the March 2016 inspection report and recommendations.

---

<sup>14</sup> Complaints Management System is a Home Office electronic management system for recording and managing complaints.

It determined which recommendations could be considered “Closed” and looked at how the Home Office learned lessons from complaints in order to drive improved performance.

## UK Visas and Immigration Central Correspondence Team

- 5.11** The re-inspection found that complaints handling by the UK Visas and Immigration Central Correspondence Team (CCT), and by Immigration Enforcement’s Detention Services Customer Service Unit (DS CSU), had improved. Both had made significant changes to their processes, in line with the recommendations.
- 5.12** Inspectors concluded that CCT had done enough to close all but one of the eight recommendations. Recommendation 5 remained “Open”. Here, CCT had taken steps aimed at ensuring that complaints were acknowledged and complainants notified where the substantive response was likely to take longer than the 20-working days service standard, but these steps were too recent for the re-inspection to confirm that they had been effective.

## Immigration Enforcement’s Detention Services Customer Service Unit

- 5.13** Under the terms of the contracts agreed with the Home Office, responsibility for responding to complaints from individuals in immigration detention rests with the contractor responsible for managing the particular Immigration Removal Centre (IRC). DS CSU’s role is to manage the complaints process, ensuring that complaints are recorded correctly, where necessary reallocated, and handled according to time and quality standards. The re-inspection found that DS CSU had reviewed its processes and that, insofar as they were relevant to DS CSU, all but two recommendations could be considered “Closed”.
- 5.14** The two that remained “Open” were Recommendations 2 and 5. In the case of Recommendation 2, DS CSU needed to improve the rigour and timeliness of its quality assurance checks. In relation to Recommendation 5, Home Office statistics for 2015 to 2016 and 2016 to 2017 (up to the end of December 2016) showed that the service standard of 95% of substantive responses within 20-working days of receipt was being met, but file sampling by inspectors identified a small number of cases where the 20-working days was exceeded without an interim response being provided. Again, there was a need to improve quality assurance checks.

## Border Force Correspondence Team

- 5.15** The re-inspection found that Border Force was some way behind CCT and DS CSU in implementing the recommendations. Recommendations 1, 2, 3 and 7 could be considered “Closed”, but Recommendations 4, 5, 6 and 8 remained “Open”. It found that there was a considerable distance between Border Force’s commitment to have the “most effective [complaints handling] model” in place and its delivery, and that opportunities to make improvements had been missed. For example:
- despite having worked with the other directorates to revise the Complaints Guidance, the Border Force Correspondence Team (BFCT) was still not fully complying with it
  - BFCT was not using the CMS efficiently to record, track and manage complaints and responses, and was overly-reliant on paper files
  - lack of effective workflow management led to unnecessary duplication

- the 20-working days service standard for complaint responses was regularly missed, despite Border Force setting 'Day 1' as the date it was satisfied it had all the information it needed from the complainant to investigate the complaint, rather than the date the complaint was initially received.

**5.16** In July 2016, management of BFCT had been moved to the Director General's Secretariat in order to integrate the team and its work more effectively into the directorate, but in early 2017 BFCT staff told the re-inspection team they felt this had not worked. Overall, inspectors formed the impression that complaints handling remained a low priority within Border Force. However, Border Force had invited the Home Office Continuous Improvement Unit (CIU) to assist it with a full review. This was due to begin on 13 March 2017 and to report on 3 April 2017, and therefore came too late to be included in the re-inspection.

## No 'new' recommendations

**5.17** The re-inspection report made no new recommendations but expected the Home Office to take the necessary actions to enable the original recommendations to be closed as soon as possible and hoped that the Border Force review produced a clear and agreed improvement plan that would be put into action as a matter of urgency.

## Learning lessons from complaints

- 5.18** The Parliamentary and Health Service Ombudsman's 'Principles of Good Complaint Handling' state that "public bodies should ensure that all feedback and lessons learnt from complaints contribute to service improvement." The 2017 re-inspection therefore looked for evidence of this.
- 5.19** It found that CCT provided a breakdown of resolved complaints by business area and theme for the UKVI and IE Senior Management Teams' weekly performance pack. BFCT also collated data on complaints received, including emerging trends, and fed this quarterly to Border Force Operational Assurance Directorate (OAD). OAD's meetings with BFCT were attended by officers from the ports and were used to identify and progress areas for improvement.
- 5.20** DS CSU had developed a quarterly complaints report, which was used to provide senior managers with oversight of complaint performance, trends and continuous improvement initiatives. DS CSU had also held workshops with IRC contractors.
- 5.21** CCT had asked the Continuous Improvement Unit to assist with identifying further possible improvements to processes and to customer engagement, such as better 'signposting' for customers who wanted to make a complaint, including a review of the website, development of an online web form and exploring the use of web chat. Border Force managers were also looking at how to improve engagement with customers in order to reduce the number of complaints, and to ensure that complainants provided all essential information with their initial complaint. Areas such as signage, leaflets, and website content, were under discussion.

# The 2019 inspection

## ‘Call for Evidence’

- 5.22** ICIBI is familiar, in general terms, with the types of complaints that are made about the Borders, Immigration and Citizenship System (BICS). Complaints are a standing item in inspections, where relevant. In practice, for most inspections the evidence ICIBI collects includes a number of items that meet the BICS definition of a complaint (“any expression of dissatisfaction that needs a response about the service we provide, or about the professional conduct of our staff and contractors”), albeit they may not have been put to the Home Office using the complaints procedure.
- 5.23** For example, many of the hundreds of submissions received for the inspection of BICS charging and fees,<sup>15</sup> published in April 2019, complained about the size of fees, the annual increases, the poor service received and, as a result, poor value for money. The system for waiving certain fees was also heavily criticised.
- 5.24** In addition, ICIBI receives letters and emails daily from individuals complaining about the service they have received or their treatment by one or other of the BICS directorates. The UK Borders Act 2007 (“the Act”) makes it clear that “the Chief Inspector shall not aim to investigate individual cases”, so this correspondence is routinely forwarded to the relevant BICS directorate to respond. However, the Act is also clear that the Chief Inspector is not prevented from “considering or drawing conclusions about an individual case for the purpose of, or in the context of, considering a general issue”. Therefore, ICIBI takes note of the sorts of concerns being raised, and where they could be indicative of a wider problem it may seek clarification from the Home Office.
- 5.25** Similarly, the stakeholders with whom ICIBI is in regular contact, who represent the aviation and maritime sectors, refugees and asylum seekers, and other ‘groups’ that encounter the BICS, routinely raise concerns about the performance of BICS directorates, including how they respond to complaints about poor service or treatment.
- 5.26** For the current inspection, on 20 February 2019 ICIBI made a public ‘call for evidence’ via its website, inviting anyone with knowledge and experience of Home Office complaint handling to write in with their evidence. The ‘call for evidence’ asked specifically whether individuals who submitted evidence felt that the complaints handling process was customer-focused, open and accountable, fair and proportionate, and that it put things right.
- 5.27** The ‘call for evidence’ received 23 responses from individuals, most of whom had made a complaint and were dissatisfied with how it had been handled. It also received a response from Liberty and another from the Parliamentary and Health Services Ombudsman (PHSO).<sup>16</sup> The issues respondents raised were broadly consistent with the evidence ICIBI had accumulated from its other regular sources.
- 5.28** The majority of respondents described complaints handling by BICS as ineffective and the process as flawed. They cited delayed responses, exceeding the 20-working days Customer Service standard. Some had experienced delays in having documents returned to them. Meanwhile, a number of people said that they had had to escalate their complaint to their MP in order to speed up the Home Office, a point that was echoed by the MPs who responded.

---

<sup>15</sup> <https://www.gov.uk/government/publications/an-inspection-of-the-policies-and-practices-of-the-home-offices-borders-immigration-and-citizenship-systems-relating-to-charging-and-fees>

<sup>16</sup> PHSO’s evidence is at Annex C. The points made by PHSO are covered in more detail in Chapter 7.

- 5.29** Most complainants were dissatisfied with the outcome of their complaint, including those who had been awarded an ex gratia payment, and many considered the matter remained unresolved. Concerns were expressed about the lack of thorough investigation and generic responses that did not fully address all of the issues raised in the complaint. PHSO's view was that this demonstrated that the Home Office was not "open and accountable".

## Immigration detainees

- 5.30** The evidence from Liberty related solely to the handling of complaints within Immigration Removal Centres (IRCs).<sup>17</sup> Since March 2018, Liberty had been assisting those in detention with making complaints about their treatment and the conditions in immigration detention, specifically at Brook House, Tinsley House, Colnbrook and Harmondsworth.<sup>18</sup>
- 5.31** The Liberty submission argued, and looked to evidence through case studies and data obtained through Freedom of Information Act (FoIA) requests, that:
- The detention complaints system is ineffective and lacks transparency
  - Individuals in detention lack confidence in the system or knowledge of the policies set to protect and empower them
  - The views of those in detention are not given sufficient weight as compared to those in positions of power
  - Informally raising complaints is unrealistic given the power dynamic in these relationships
- 5.32** In support of this, Liberty pointed to a "worryingly low" number of upheld complaints ("only 15% of complaints filed" in 2016-17). It also drew attention to the fact that when complaints did not receive a substantive response before the individual was released from detention they were often not pursued by the individual and remained unresolved, with opportunities for learning lost. Meanwhile, some individuals who had received unsatisfactory responses to their complaints were too dispirited to want to take the matter further.
- 5.33** Liberty made a number of recommendations.<sup>19</sup> They include the appointment of an independent complaints officer at each IRC, shorter timeframes for investigating and responding to complaints, and doing more to ensure that complaints result in changes so that individuals can have more confidence in the complaints system.

## Marriage fraud

- 5.34** The 'call for evidence' received a coordinated response from a number of the individuals raising the issue of marriage fraud.<sup>20</sup> They all contended that the Home Office was doing nothing to assist the victims of marriage fraud and had taken no action in their particular cases.<sup>21</sup>

---

17 Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectors of Constabulary (and equivalents in Scotland and Northern Ireland) are responsible for inspecting functions exercised at immigration removal centres, short-term holding facilities and under escort arrangements, except where ICIBI has been directed to do so by the Home Secretary. In June 2018, the Home Secretary commissioned the ICIBI to produce an annual report on the working of the Home Office "Adults at Risk [in detention]" policy. The first report will cover 2018-19. Some of the points raised by Liberty regarding complaints about healthcare are best dealt with in that report, rather than here.

18 Liberty's project to investigate the effectiveness of detention complaints and support to those who were making complaints was ongoing at the time it made its submission to the inspection.

19 Liberty's recommendations are set out in full in Annex D.

20 "Marriage Fraud" occurs where one party to a marriage deceives the other into believing that the relationship is genuine but marries with the sole or primary intention of benefiting their immigration status in the UK.

21 The ICIBI Inspection Plan for 2019-20 includes the possible re-inspection of the 2014 Immigration Act provisions for tackling "sham" marriages and a possible paper-based re-inspection of status review casework. Subject to further scoping, these may provide an opportunity to inspect the Home Office's response to marriage fraud.

**5.35** The Home Office told inspectors that the Parliamentary and Health Service Ombudsman (PHSO) supported “our stance on our handling of marriage fraud cases through the complaints process, as we are limited in what we can release due to our obligations under the [Data Protection Act] DPA. Comments have been made in many of the PHSO final investigation reports in relation to our complaint handling that UKVI acted reasonably when informing complainants that they were unable to provide details as per the DPA.”



## 6. Inspection findings

### Guidance

#### Recommendation 1

- 6.1** Recommendation 1 from ‘An inspection of the Handling of Complaints and MPs’ Correspondence’ focused on the guidance available to Home Office staff in relation to complaints handling and noted that it needed to be “concise, unambiguous and practical” so that customer-facing staff, those responding to complaints and those responsible for recording outcomes and actions acted efficiently and effectively. It was implicit that the guidance also needed to be kept up-to-date.
- 6.2** Recommendation 1 did not refer directly to the guidance available to the public about how to make a complaint, but the same principles hold true and, clearly, internal and external guidance need to be fully aligned.
- 6.3** This is echoed by the first of the ICIBI’s ‘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)”

### Definitions

- 6.4** ‘Complaints guidance for UK Visas and Immigration, Immigration Enforcement and Border Force’,<sup>22</sup> referred to as “Complaints Management Guidance”, sets out how complaints are handled by the three operational BICS directorates. It is accessible via GOV.UK. It was first published in February 2015 and last updated on 19 September 2016.
- 6.5** The guidance provides a simple definition of what the immigration and borders directorates understand to constitute a complaint:
- “any expression of dissatisfaction that needs a response about the service we provide, or about the professional conduct of our staff and contractors.”

---

<sup>22</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/553890/Complaints\\_Management\\_Guidance\\_September\\_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/553890/Complaints_Management_Guidance_September_2016.pdf)



- 6.6** It also distinguishes clearly between “service complaints”, “minor misconduct complaints” and “serious misconduct complaints”, listing examples of each.<sup>23</sup> Annex A is devoted to serious conduct complaints and goes into considerable detail about how these will be handled by the Home Office’s Professional Standards Unit (PSU), which may include referring the complaint to another agency, for example the police, to pursue.

## Simple processes

- 6.7** ICIBI’s second ‘Expectation’ concerns the processes that both staff and anyone interacting with BICS, in this case complainants, are required to follow:

“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)”

## Directorate complaints webpages

- 6.8** The guidance contains hyperlinks<sup>24</sup> to the separate UKVI, Immigration Enforcement and Border Force GOV.UK complaints webpages. These can also be found via an internet search for “[Directorate] complaints procedure”.
- 6.9** The complaints webpages of the three directorates reflect the different functions of each. For example, the UKVI webpage links to the service standards for different types of visa application, while the Border Force webpage refers to “Arriving at the border” and “Using ePassport Gates”.
- 6.10** However, in places the webpages are potentially confusing, either because they refer to a function that is the responsibility of one of the other directorates, or because they refer to something other than complaints. For example, the UKVI webpage has headings “If you want to report an immigration crime”, under which it refers to “illegal working”, “false application to stay in the UK” and “smuggling”, and “If you’ve had goods or a vehicle seized”, with a link to the “National post seizure unit”. Similarly, the Border Force webpage has the headings “Detention centre facilities or conduct of staff” and “Request personal information or access to government data”.
- 6.11** Meanwhile, where the webpages should be consistent, this is not always the case. All three state that “complaints should be made no later than 3 months after the date of the incident unless there are exceptional circumstances” and “We’ll investigate your complaint and reply to you within 20 working days. We will contact you if we need more time to investigate your complaint.” All three also state that “If your complaint suggests serious professional misconduct we aim to respond within 12 weeks, following an impartial investigation.” But, only the UKVI webpage refers to ex gratia payments.

---

<sup>23</sup> See footnotes 1-3.

<sup>24</sup> Working as at mid-May 2019.

- 6.12** UKVI and Immigration Enforcement request the same details in support of the complaint, with the exception that the former also asks for “your Home Office reference details, and any other references that will help us to investigate your complaint, for example refund reference, appeal reference or UAN (unique application number)” and states “if your complaint is in relation to our contact centre we will need to know the date you called, the number you dialled and the number you called us from”.
- 6.13** Understandably, Border Force requests details that relate to the complainant’s entry to the UK, including flight and passport numbers. Less explicably, Border Force does not ask for a telephone number, while UKVI and Immigration Enforcement both do, stating “we may contact you to resolve your complaint by phone or to request further information”.
- 6.14** Each webpage links to “other areas of the Home Office that have their own complaints procedures”: UKVI lists Border Force, Home Office, HM Passport Office (HMPO)<sup>25</sup> and the Disclosure and Barring Service (DBS), but not Immigration Enforcement; Immigration Enforcement lists UKVI, Border Force, Home Office, HMPO and DBS; Border Force lists UKVI, Immigration Enforcement, Home Office and HMPO.

## Detention Service Order 03/2015

- 6.15** Listed with the hyperlinks to the directorate webpages, a hyperlink to all of the Detention Service Orders currently in force connects to ‘Handling of Complaints’ (DSO 03/2015). DSO 03/2015 is also accessible via GOV.UK under ‘Handling complaints in immigration removal centres’, which includes a series of annexes containing a one-page summary of the process, a flowchart, a complaint form with guidance on its completion,<sup>26</sup> sample acknowledgement letters, a checklist of points that must be covered in a response, a feedback form for detainees making a complaint, and a note of how “serious allegations” will be handled.
- 6.16** DSO 03/2015’s purpose is “To provide instructions and guidance on the procedure for handling complaints in immigration removal centres (IRCs), short term holding facilities and residential short term holding facilities (STHF), pre-departure accommodation (PDA) and during escort.” It assumes that Home Office staff are aware of the Complaints Management Guidance and relevant procedures.
- 6.17** DSO 03/2015 was implemented in August 2015. It was reissued in February 2017 and was scheduled for review in February 2019. However, as at May 2019 the February 2017 version was still the latest version available via the Home Office intranet.

## Contractors

- 6.18** Under the heading ‘Complaints about contractors’, the Complaints Management Guidance states that “Complaints about contractors supplying services to IBDs<sup>27</sup> should be referred in the first instance to the contractor’s own complaints process.” However, the Border Force webpage states that anyone wishing to make a complaint about “the professional conduct of Border Force staff or contractors” should email or write to “us” (i.e. Border Force).

<sup>25</sup> HM Passport Office comes under the same Director General as UKVI.

<sup>26</sup> This is also available in Albanian, Arabic, Chinese (Mandarin), Dari, Farsi, French, Hindi, Kurdish, Pashto, Polish, Portuguese, Punjabi-Gurmukhi, Punjabi-Shahmuki, Somali, Spanish, Tamil, Urdu and Vietnamese.

<sup>27</sup> “IBDs” stands for “Immigration and Border Directorates”, here used to mean Border Force, Immigration Enforcement and UK Visas and Immigration.

- 6.19** The hyperlink for “contractor website” opens to a list of countries where visa applications are managed by one of two contractors: VFS.Global (VFS) or TLScontact (TLS). Clicking on a country opens the website of the relevant contractor.
- 6.20** Neither contractor’s homepage refers to “Complaints”. For VFS, this is found under “Customer Experience”, while for TLS it is under “Contact Us”. The VFS site explains the company’s service standard for complaints handling (a full response within 48 hours or updates on progress if this is not going to be met). The TLS website is silent on response times.
- 6.21** Both websites provide online forms with dropdown menus for “Complaint Type” (VFS) or “Reason for Contact” (TLS), the latter using some of the categories of service and minor misconduct complaints recognised in the Home Office guidance, while the former has “Security standards; Contact Centre (Email/Calls); Website services; Services at the Visa Centre; Staff; Others”. In both cases, there is a mandatory free text box requiring the complainant to provide further details of their complaint.
- 6.22** Complainants to VFS are able to track, escalate and close their complaint via further online forms. The TLS website does not offer this, but one of the options in the dropdown menu is “Complaint Handling (Failure to Respond)”.

## Oversight of the Home Office complaints process

- 6.23** The ‘Oversight of the Home Office complaints process’ chapter of the guidance lists the various bodies that provide additional oversight of complaints, their remits and, in most cases, hyperlinks to their websites.
- 6.24** As at May 2019, this still referred to the “Independent Police Complaints Commission (IPCC)”, rather than the Independent Office for Police Conduct (IOPC), which replaced the IPCC in January 2018. The IPCC hyperlink did not redirect to the IOPC.
- 6.25** The guidance also refers to oversight by the “Crown Servant Monitor” (CSM) of “Complaints made about the service or conduct of third party contractors employed at juxtaposed controls in France and Belgium”. It does not explain that this relates to the exercise of search powers by contractors, or that since June 2017 the CSM role has been performed by a member of Border Force’s Operational Assurance Directorate,<sup>28</sup> or that the CSM’s reports are protectively marked and therefore not publicly available.
- 6.26** The CSM’s April 2018 report contained a section on “Complaints”, in which the CSM noted that he had reviewed “the seven complaints involving contractors at the juxtaposed controls submitted to the Border Force Complaints Team in Croydon”, all of which related to discourtesy or damage. He concluded that:

“some of the complaints have been sent to Border Force weeks after the alleged event which does make recollection and evidence gathering difficult. However, given the volume of freight passing through Calais, Coquelles, and Dunkirk this year the level of complaints received is extremely low and does not give rise to any significant concerns.”

---

<sup>28</sup> The role, which was created by Section 41(1) of the Immigration, Asylum and Nationality Act 2006, was previously performed by an officer from Her Majesty’s Revenue and Customs. On the latter’s retirement, Home Office legal advice was that Border Force Operational Assurance Directorate was sufficiently independent from operations to perform the Crown Servant Monitor role.

- 6.27** The “Oversight” chapter also refers to the Independent Chief Inspector of Borders and Immigration (ICIBI), with a hyperlink to the ICIBI website and to the 2016 inspection report, but not to the 2017 re-inspection report.

## Processes

- 6.28** The remainder of the “Complaints Management Guidance” deals with the internal processes for handling complaints. Most of the original ICIBI recommendations are about improving the efficiency and effectiveness of these processes.
- 6.29** The guidance makes it clear that “All staff have a responsibility to ensure that any complaint ... is dealt with appropriately, in accordance with the handling and processing standards”. It describes and encourages “local informal resolution” (through discussion, acknowledgement, agreement and, where appropriate, apology) for verbal and face-to-face complaints, and “formal resolution” for complaints received by telephone or in writing, or complaints about serious misconduct. Where a complaint cannot be resolved informally, staff are required to provide the “customer” with information about how they can submit a written complaint.
- 6.30** The guidance specifies that “All written complaints should receive an acknowledgement and be registered on [the Complaints Management System] CMS” using “the date the complaint is received into the Home Office” as the date of receipt on CMS. It also specifies that “All complaints, their outcomes and any ex gratia payments claimed and paid must be logged in order to track the progress of individual cases and report on the number and type of complaints received” and sets out what is required in terms of “File management and complaint storage”.
- 6.31** The guidance details the roles, responsibilities, work flows and timescales involved in processing, investigating and responding to complaints, including explaining why, if this is the case, it has not been possible to investigate the complaint fully and respond to all the issues raised, and stating whether the complaint has been “upheld/partially upheld or not upheld”. It also details: how complaints from children, anonymous complaints and third-party complaints should be handled; the escalation (“Stage Two Complaint”) process, including the right of directorates “not to communicate further or restrict communication to certain channels” where a complainant “is abusive, vexatious, frivolous, threatening or continues to correspond directly with [a directorate] despite being advised of the external escalation routes”; and, the requirement for “a thorough quality assurance process to be in place in all complaints teams”.

## Learning from complaints

- 6.32** The final chapter of the “Complaints Management Guidance” is headed ‘Learning from complaints’. This notes that: “Complaints are an important way for the business to better understand issues from a customer perspective, learn lessons and make improvements” and tells central complaints teams that they must complete a management information form for each complaint response. It states that: “The collated information and trends identified will be reviewed regularly by senior management and be used to drive improvements in conjunction with operational business areas.”

## Directorate Standard Operating Procedures

- 6.33** Inspectors were given copies of the ‘Standard Operating Procedures’ (SOPs) for handling complaints currently in use by UKVI (Customer Contact Hub (CCH) and Central Correspondence

Team (CCT)) and by the Border Force Correspondence Team (BFCT). The UKVI SOP had been created in 2016 and was last updated in September 2018.<sup>29</sup> It was due for review in March 2019, but as at May 2019 there was no evidence that this had been done. Inspectors were told that the Border Force SOP, which was undated, had been derived from the UKVI SOP. They were both accessible via the Home Office intranet (“Horizon”), but not publicly available. The Border Force SOP was marked “Official – Sensitive”.

- 6.34** Both SOPs stated that their purpose was “To outline the agreed workflow process and best practice for handling service and minor misconduct complaint correspondence”, and both emphasised that these needed to be followed in order to achieve the Customer Service Standard of responding to 95% of these complaints within 20-working days of receipt.

## Conclusion

- 6.35** While there are some “housekeeping” issues with ‘Complaints guidance for UK Visas and Immigration, Immigration Enforcement and Border Force’ and with the directorate webpages to bring the former up-to-date and make the latter more consistent, the published guidance in relation to complaints handling is for the most part, “concise, unambiguous and practical”. The same is true of Detention Service Order 03/2015. Meanwhile, UKVI’s and Border Force’s internal Standard Operating Procedures usefully spell out what is expected of staff who are handling complaints, but these procedures are overdue for a review.
- 6.36** In the case of services provided by third parties under contract to the Home Office, it is reasonable that any complaints should be addressed to the supplier in the first instance. However, the Home Office has both a responsibility and an interest in ensuring that the Supplier’s standards of service and conduct at least match its own, and this and the identification of necessary improvements would be better served if the Home Office specified how suppliers should record complaints and responses.

## Further ICIBI’s ‘Expectations’

- 6.37** Three of the ICIBI’s ‘Expectations’ are relevant to Recommendations 2 to 7 from the 2016 inspection report. The first of these, which the 2019 inspection did not test in detail, concerns the competence of the staff exercising the particular function (see Annex B for further details), in this case the central complaints handling teams. However, staff from each of these did tell inspectors that they found their Standard Operating Procedures (SOPs) clear and easy to follow.
- 6.38** The second and third ‘Expectations’ concern getting decisions and actions ‘right first time’ and, where this is not the case, identifying errors, acknowledging them and putting them right, promptly. The former stresses the importance of accurate record keeping, while the latter specifically references efficient, effective and consistent complaint handling, along with learning lessons and continuous improvement.

---

<sup>29</sup> ‘Standard Operating Procedure for the handling of complaints for staff in Central Operations’, an internal Home Office document, produced in March 2016 and last updated in September 2018.

# Quality Assurance

## Recommendation 2

- 6.39** Recommendation 2 from ‘An inspection of the Handling of Complaints and MPs’ Correspondence’ focused on the requirement for management and/or quality assurance checks to ensure that guidance was being applied as intended, that investigations of complaints were thorough and impartial, that responses dealt with the substance of the complaint, and that remedies were appropriate.

## UKVI’s ‘Quality Framework and Procedures’

- 6.40** In February 2019, UKVI issued a ‘Quality Framework and Procedures’ document for staff working in Central Operations, which includes the Customer Contact Hub (CCH) and Central Correspondence Team (CCT). The document outlined the “quality sampling”<sup>30</sup> procedure managers were required to follow. This involved running five quality checks on the work of each member of staff<sup>31</sup> each month, testing it against five different markers of quality. The process was retrospective. The sampled responses had already been sent to the complainant. The aim was to improve the consistency of complaint handling and the standard of the responses by identifying trends and having managers provide individuals and teams with regular feedback.
- 6.41** At the time of the inspection, UKVI was still embedding these new procedures and was in the process of rolling it out to the MPs’ Correspondence Unit. While managers were aware of the procedures, few staff appeared to know about them, and it was too soon for UKVI to have collected any performance data in relation to the five quality markers.
- 6.42** Inspectors examined 30 complaints (15 service complaints and 15 minor misconduct complaints) received by CCH between October and December 2018 and recorded on the Complaints Management System (CMS). For 27 (90%) of the 30 complaints, the response was copied to CMS and had met the 20-day service standard. It was not possible to see whether any of the responses had been quality assured.

## Border Force Quality Assurance measures

- 6.43** Inspectors were told that operational managers within each Border Force business area were routinely sampling cases to ensure full compliance with complaints handling guidance. The Border Force SOP directs officers drafting a response to a style guide. This sets out the quality standard required of responses to complaints by Border Force, Immigration Enforcement and UKVI, based on a commitment to “the highest quality”, which means all responses must be “accurate, clear and helpful” and provide “a complete answer”.
- 6.44** Additionally, within the Border Force Correspondence Team (BFCT), the quality assurance process involved 100% peer-to-peer checking to identify errors, such as spelling or grammatical mistakes, and to share best practice.
- 6.45** Where the complainant is not satisfied with the response they have received and has requested a review, the latter is dealt with by a BFCT manager who drafts the “Stage 2” response for sign

---

<sup>30</sup> ‘Quality Framework and Procedures’ defines “quality sampling” as “the method by which staff are assessed against set targets using an agreed quality framework to ensure the information given out is accurate and customer service levels achieve the set expectations. Quality sampling is assessed against a RAG rating system.”

<sup>31</sup> Excluding new staff and those under training whose work is subject to 100% checking.



off by the BFCT SEO. Staff told inspectors that Stage 2 reviews provided retrospective assurance of those cases and were used to identify individual training issues. They also argued that the fact that such a tiny minority of complaints reached Stage 2 was evidence that their first-line assurance was effective.

- 6.46** BFCT management explained that it would not be possible for managers to quality assure Stage 1 responses prior to them being sent out without slowing down the complaint handling process and risking more complaints about missing the 20-working days Customer Service Standard, which was already challenging.
- 6.47** Of the 30 complaints examined by inspectors, (15 service complaints and 15 minor misconduct complaints), based on the CMS record, inspectors concluded that each of those 30 complaints had been thoroughly investigated. A copy of the substantive response had been saved to CMS in all cases, and these confirmed that all elements of the complaint had been addressed. The tone of each response was appropriate.
- 6.48** All 30 responses had been quality assured before they were sent to the complainant. However, of the 30, 11 (37%) had missed the 20-day service standard and copies of the standard acknowledgement letter and any interim responses had not always been saved to CMS. In five cases, the date recorded for when a response was due was incorrect.

## **Immigration Enforcement – Detention Services Customer Service Unit**

- 6.49** Detention Services Order 03/2015 sets out the quality assurance process for complaints from immigration detainees:
- “IRC<sup>32</sup> suppliers investigating and responding to detainee complaints will ensure that the written response is subject to quality assurance by a second, more senior, person before being sent out to the complainant
  - Home Office Delivery Managers will carry out a monthly dip sample of responses to monitor the quality of initial responses and work with IRC suppliers and others in cases where they are deemed to be unsatisfactory. Any concerns about the quality of responses which cannot be resolved locally will be escalated to the Head of Detention Operations who will be responsible for taking action with the IRC supplier.”
- 6.50** Detention Services Delivery Managers (Grade 7), who are based at certain IRCs, have oversight of complaints received and of the Supplier’s investigations, ensuring that if there are any issues with the latter these are identified early. Meanwhile, the Detention Services Customer Service unit (DS CSU) is managed day to day by an HEO, with a Grade 7 Head of Operational Practice who has complaints as one part of his role. DS CSU is responsible for engaging with suppliers about the effectiveness of remedies in the case of upheld complaints and for pressing for continuous improvement. It looks at the timeliness of investigations, the quality of responses and the appropriateness of remedies. However, achieving consistency across the IRC estate is challenging as the IRCs are managed by a number of different suppliers.
- 6.51** Inspectors examined 30 complaints recorded by DS CSU on CMS between October and December 2018 to check whether the guidance was being followed and the complaints were being correctly recorded and progressed. The guidance states that “all written complaints should receive an acknowledgement and be registered on CMS”. Detention Services Order 3/2015 goes further and states that DS CSU will “Undertake regular dip sampling of complaints

on CMS to ensure that all required documents (e.g. complaint, acknowledgement letter, interim response (where used) or substantive response) have been uploaded”.

- 6.52** For all 30 complaints, CMS contained copies of the original complaint and the response. However, inspectors found grammatical errors, poorly constructed letters and unclear answers to the points raised. There was no indication from any of the 30 CMS records that any quality assurance had taken place.

## Conclusion

- 6.53** As at May 2019, it was too soon to assess the effectiveness of the new UKVI framework and procedures, but the retrospective nature of the quality assurance sampling means that if a problem with a response is discovered it is too late for that complainant, albeit it may help to improve the quality of future responses.
- 6.54** On the face of it, BFCT’s system of quality assuring all responses before they went to the complainant was more reliable than the retrospective ‘dip sampling’ approach of CCT and DS CSU, and therefore preferable. However, this was at the expense of compliance with the service standard in a significant proportion of cases, and Border Force had considerably fewer complaints to handle than UKVI. Also, BFCT needed to be wary of assuming that because only a few complainants sought a ‘Stage 2’ review this was positive proof of the quality of its responses.
- 6.55** The sample of 30 DS CSU complaints may not have been representative of the general standard of the handling of complaints from immigration detainees. However, the poor quality of the responses and the absence of any evidence of quality assurance suggests that while CMS was being used effectively for the purposes of record keeping, the requirements of DSO 03/2015 were not being met.
- 6.56** It may be that a response that meets the BICS quality standards (free of grammatical and spelling errors, clear, factually accurate, customer-focused, and addressing all of the points raised in the complaint) will still not satisfy the complainant, but an inaccurate and incomplete response will almost certainly increase their sense of grievance. An effective quality assurance regime is therefore an essential element of any complaints handling process. All three complaints handling areas should therefore revisit Recommendation 2 and tighten up their procedures.

## Escalation

### Recommendation 3

- 6.57** Recommendation 3 from ‘An inspection of the Handling of Complaints and MPs’ Correspondence’ concerned the escalation process for complainants who remained dissatisfied having received a response to their complaint.
- 6.58** Inspectors reviewed the template letters used by UKVI’s Central Correspondence Team, Border Force Correspondence Team, and Detention Services Customer Service Unit to respond to complaints. Each clearly and concisely outlined the escalation process and the complainant’s options. Staff confirmed to inspectors that they were aware that this was a mandatory element of the response.



## Conclusion

- 6.59** The 2017 re-inspection concluded that this recommendation could be “Closed” for all three areas of BICS. Inspectors found nothing in 2019 to suggest it should be re-opened.

## Customer Service Standard

### Recommendation 4

- 6.60** Mindful of the Parliamentary and Health Service Ombudsman’s ‘Principles of Good Complaint Handling’, which state that public bodies should: “Deal with complaints promptly, avoiding unnecessary delay, and in line with published service standards where appropriate”, Recommendation 4 from ‘An inspection of the Handling of Complaints and MPs’ Correspondence’ concerned the timeliness of responses, specifically the Home Office’s adherence to the published Customer Service Standard of responding to 95% of complaints within 20-working days.
- 6.61** The 20-working day Customer Service Standard is common across government departments and is specified by the Cabinet Office in the case of departmental responses to correspondence from MPs.<sup>33</sup> Nonetheless, the original report recommended that the Home Office should consider revising its Customer Service Standard if it was unwilling or unable to ensure that it would be met.

### UKVI

- 6.62** By the 2017 re-inspection, UKVI’s Central Correspondence Team (CCT) had reviewed its processes and improved its performance to the point where it was confident meeting the published Customer Service Standard. On that basis, Recommendation 4 was “Closed” for UKVI.
- 6.63** However, the data provided to inspectors by the Home Office (see Figure 3) indicated that in the six quarters from 2017 Q2 (April-June) and 2018 Q3 (July-September), UKVI achieved the service standard for service complaints in just two quarters and for minor misconduct complaints in none.
- 6.64** Inspectors were told that during 2018 some of UKVI’s complaints handling staff were reallocated to deal with other priority work within the directorate, which had affected performance in Q2 and Q3. They were also told that a “recovery plan” was implemented in October 2018 and that month the service standard was met.<sup>34</sup>
- 6.65** Inspectors were also told about a new process that UKVI had begun piloting, also in October 2018. This aimed at saving time. Instead of waiting for an incoming complaint to be logged and forwarded to CCT by a Customer Contact Hub (CCH) Administrative Officer, CCT Executive Officers (EO) were accessing the complaints mailbox daily and taking the oldest cases (received within 24 to 48 hours) that were still marked as “Unread” and dealing with them. The result was that requests to business areas for contributions were sent out earlier, making it more likely that the 20-working day Customer Service Standard would be met.

---

<sup>33</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/504396/Cabinet\\_Office\\_Guidance\\_on\\_correspondence\\_-\\_March\\_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504396/Cabinet_Office_Guidance_on_correspondence_-_March_2016.pdf)

<sup>34</sup> At the time of the inspection, data for Q4 2018 was not yet available.

- 6.66** Inspectors were told that because of the pilot, CCH staff had been freed up to respond to straightforward complaints, again helping UKVI to meet the Customer Service Standard.
- 6.67** As at March 2019, the pilot process was running in tandem with the process set out in the Standard Operating Procedure. However, UKVI management told inspectors that they were close to making the pilot process the standard.

## Detention Services

- 6.68** Like CCT, by the 2017 re-inspection, Immigration Enforcement's Detention Services Customer Service Unit (DS CSU) had reviewed its processes and improved its performance. It too was confident of meeting the published service standard, and Recommendation 4 was therefore "Closed" for Detention Services.
- 6.69** The data provided for the six quarters from 2017 Q2 (April-June) and 2018 Q3 (July-September) (see Figure 2) showed that Detention Services (against much smaller volumes of complaints) had performed better, in general, than UKVI, but it too had failed to achieve the service standard in most quarters: four out of six for service complaints and five out of six for minor misconduct complaints.

## Border Force

- 6.70** The 2017 re-inspection team had found that Border Force Correspondence Team (BFCT) had made no meaningful progress towards meeting Recommendation 4.
- 6.71** Immediately prior to the 2017 re-inspection, Border Force Operational Assurance Directorate (OAD) carried out a one-day visit to BFCT to look at its handling of misconduct complaints and to establish whether any more regular quality assurance of the process, the investigations, or the responses to complaints, was needed. Amongst its conclusions it identified as an "area of weakness":
- "Investigation timescales:** The unique nature of Border Force operations makes it difficult for investigations to be completed within the deadlines and target dates are regularly missed. This needs to be borne in mind by the BFCT and consideration given as to whether the process can be streamlined centrally to allow more time for investigation by the relevant port managers."
- 6.72** At the beginning of 2019, BFCT managers and staff told inspectors that the target of providing a substantive response within 20-working days in 95% of cases had never been met. The data (see Figure 1) provided for the six quarters from 2017 Q2 (April-June) and 2018 Q3 (July-September) confirmed this.
- 6.73** Staff told inspectors that the investigation of the complaint by the relevant Border Force business area, typically a port or an airport, often took longer than the 9 days allocated to this stage of the process. Inspectors were also told that each region handled the investigation of complaints differently and operational pressures and resources meant that the regions often failed to adhere to guidance. In particular, investigations at Heathrow Airport were "not geared to meet the 9-day SLA" because they were not seen as a priority.
- 6.74** BFCT managers agreed that the 9-day turnaround for the investigation of a complaint was often breached. Some felt there was little they could do about it as it was the responsibility of regional managers to decide how to prioritise this work. They believed that the status quo had

been accepted and that the numbers of complaints affected were such that, overall, BICS was still able to meet the published service standard.<sup>35</sup> However, others thought that closer working between BFCT and business areas and better communication, including regular meetings, could improve timeliness. They said that currently there was a disconnect between BFCT and the regions and BFCT was sometimes viewed as “the baddies”.

**6.75** Managers also highlighted BFCT resources as a reason why Border Force was failing to meet the published Customer Service Standard. This was supported by the ‘Diagnostic Report’ produced in April 2017 by the Home Office Continuous Improvement Unit, working with BFCT, which found that the published Customer Service Standard was “realistic when capacity exists to meet demand.” The ‘Diagnostic Report’ recommended that BFCT:

“initially focus on reducing demand and increasing capacity to ensure all cases where all relevant information and/or contributions are returned in time are resolved within 20 days.”

**6.76** In February 2019, inspectors visited Manchester Airport and Heathrow Terminal 4 and met with staff responsible for receiving complaints from BFCT, allocating them for investigation and monitoring the investigations.

**6.77** At Manchester Airport, inspectors were told that the vast majority of investigations were completed within the 9-day timeframe. Staff said that they had “hit 100% in November 2018”.

**6.78** At Heathrow Terminal 4, one of two officers were rostered to work one non-operational shift per week to deal with the allocation and monitoring of complaints investigations. This meant that some complaints waited several days before they were allocated. The situation was exacerbated because the “complaints shift” was “regularly” cancelled as the rostered officer was required for operational duties.<sup>36</sup> Inspectors were told that a proposal to overcome these delays by creating a central complaints team for Heathrow’s six business areas had been put to senior managers but, at the time of the inspection, no decision had been made.

## Conclusion

**6.79** The performance data for the UKVI Central Correspondence Team (CCT) and Immigration Enforcement’s Detention Services Customer Service Unit (DS CSU) from 2017 Q2 and 2018 Q3 indicated that more often than not both were failing to meet the Customer Service Standard. For whatever reasons, the improvements that led to Recommendation 4 being “Closed” for both teams had not been sustained.

**6.80** As a result, both needed to revisit the original Recommendation and either take steps to ensure that the published service standard is regularly met or replace it with one that is achievable. The new process being piloted by CCT may provide it with a partial solution, but UKVI also needs to ensure that CCT staffing levels are set at the right level and not reduced to meet other demands.

**6.81** Border Force Correspondence Team (BFCT) has never met the published Customer Service Standard of providing a substantive response to 95% of cases within 20-working days, nor did it have any plan or intention to do so. The target was regarded as unachievable, particularly while each business area within Border Force was permitted to deal with complaints investigations in its own way and according to its own priorities.

---

<sup>35</sup> The data at Figures 2 and 3 shows that this was not the case.

<sup>36</sup> At the factual accuracy stage, the Home Office commented that: “The T4 complaints team is meant to have 3 complaints days a fortnight when operationally possible. The complaints shift has from time to time been cancelled – but to describe this as happening regularly is incorrect.”

- 6.82** While 9 days to complete an investigation may be insufficient in light of the practicalities of Border Force's business, adjusting the process in order to apportion more time is unlikely to achieve the 95% target without a push by regional management to treat complaints as a priority and without greater standardisation of the receipt, allocation and monitoring of investigations by business areas to ensure that they are progressed without avoidable hold-ups. It may be that a revised timeline would also require an increase in BFCT resources.

## Acknowledgement and notification of delay

### Recommendation 5

- 6.83** Recommendation 5 from the 2016 inspection report focused on the Home Office's interaction with the complainant: to acknowledge it had received their complaint, to notify of the likelihood that the 20-working day target for a substantive response would not be met, and to provide regular updates pending the substantive response.
- 6.84** In 2017, this was the only recommendation that remained "Open" for UKVI's Central Correspondence Team (CCT). It was also "Open" for Immigration Enforcement's Detention Services Customer Service Unit (DS CSU) and for the Border Force Correspondence Team (BFCT).

### Published guidance

- 6.85** 'Complaints guidance for UK Visas and Immigration, Immigration Enforcement and Border Force' is clear that "All written complaints should receive an acknowledgment" and "If a complaint is not going to be answered within the 20 day target, the complainant should be informed before the 20 day target is reached and continue to receive appropriate updates until the case is closed."
- 6.86** The complaints webpages for UKVI, Immigration Enforcement and Border Force repeat the substance of the undertakings to acknowledge receipt and respond within 20 days. They do not refer to providing "updates" but instead state that:

"We will contact you if we need more time to investigate your complaint."

### UKVI Central Correspondence Team

- 6.87** In 2019, inspectors were told that CCT receives the vast majority of complaints via the Home Office Complaints Inbox, the details of which are published on the complaints webpages for UKVI and Immigration Enforcement. When a complaint is received through the Complaints Inbox, an automatic email acknowledgement is sent to the complainant, referring to the 20-working days Customer Service Standard.
- 6.88** UKVI's Standard Operating Procedure (SOP) instructs staff in the Customer Contact Hub (CCH) to "Issue an acknowledgement letter if the customer contacts us by letter, and where the email auto acknowledgement is not applicable." During focus groups, staff confirmed they were aware of this requirement and stated that acknowledgement letters were sent out and a copy added to the Case Information Database (CID).

## Border Force Correspondence Team

- 6.89** Border Force Correspondence Team (BFCT) also receives the majority of complaints via email. They arrive either in the Home Office Complaints Inbox or in the Border Force Compliments and Complaints Inbox, both of which are fielded by UKVI's Central Correspondence Hub (CCH). Details of both are published on Border Force's complaints webpage.<sup>37</sup> Email acknowledgements are sent automatically from both inboxes and explain the 20-working days Customer Service Standard.
- 6.90** Border Force's SOP instructs BFCT staff that: "Acknowledgement letters should be issued for complaints where the automated email acknowledgement has not been sent". Inspectors were told in focus groups that this procedure was followed.
- 6.91** The SOP also states that where an investigation involving the relevant business area is required, "an interim letter should be issued to the customer explaining that we may not meet the service standard of 20 working days as a thorough investigation is required." This should be sent after BFCT has sent a commissioning email to the business area responsible requesting it to carry out an investigation.

## Immigration Enforcement – Detention Services Customer Services Unit

- 6.92** Most complaints from immigration detainees are made using a form 'DCF9'. This paper form is completed by the detainee and placed in a complaints post-box at the Immigration Removal Centre (IRC) or place of detention. The boxes are opened daily by Immigration Enforcement staff and the complaints are scanned and sent via email to Immigration Enforcement Detention Services Customer Services Unit (DS CSU), who log them onto the Complaints Management System (CMS) and forward them to the relevant contractor to investigate and respond.
- 6.93** Detention Service Order (DSO) 03/15 states that the complainant must receive an acknowledgement from "the responder" (the contractor) within two working days of allocation. A copy of the acknowledgement must be sent to DS CSU for uploading onto CMS. Inspectors were told that the process was firmly embedded and all complaints received an acknowledgement letter.
- 6.94** However, DS CSU staff told inspectors that if it became apparent that an investigation would take longer than the 20-day service standard, a common reason for which was that if the staff cited in the complaint were on leave, they would "stop the clock" by closing the case on CMS and sending an interim response. Detention Services managers confirmed this practice.

## Conclusion

- 6.95** Complaints about UKVI, Immigration Enforcement and Border Force sent via email to one of the addresses provided on the BICS webpages receive an automated acknowledgement. The Standard Operating Procedures for CCT and BFCT make it clear that written complaints received via other means must receive an acknowledgement letter and, based on what staff told inspectors, this instruction appears to be followed. Acknowledgements include reference to the 20-working day service standard, which is also clearly set out on the webpages.
- 6.96** Separately, DS CSU needs to stop the practice of closing complaints on CMS where the 20-working days service standard is not going to be met, since this distorts the true time

---

<sup>37</sup> <https://www.gov.uk/government/organisations/border-force/about/complaints-procedure> & <https://www.gov.uk/government/organisations/uk-visas-and-immigration/about/complaints-procedure>

taken to respond to complaints. It is also contrary to the Home Office's statement in its formal response to Recommendation 6 (see below) from the original inspection that "All cases will remain open on the CMS until a substantive response has been provided to the customer."

## Use of the Complaints Management System

### Recommendation 6

- 6.97** Recommendation 6 pressed the Home Office to make effective use of the Complaints Management System (CMS). In addition to ensuring the complaint remained "Open" on CMS until a substantive response had been provided to the complainant, it argued for CMS to be used to track the full history of a complaint from receipt to resolution, to record accurately the details of any investigation and its findings, and to store a copy of the original complaint and the response. This links back to the ICIBI 'Expectation' that decisions and actions are recorded "accurately, in the required format and detail, and can be readily retrieved" in order to demonstrate that they are "right", "reasonable" and "consistent".

### Guidance and Standard Operating Procedures

- 6.98** 'Complaints guidance for UK Visas and Immigration, Immigration Enforcement and Border Force' states that all complaints relating to BICS directorates must be recorded on CMS:
- "except where there are exceptional circumstances for a record being kept on an alternative system that has more restricted access (for example, where the security classification of the case requires that only certain staff can view the file)."
- 6.99** This message is reinforced in the Standard Operating Procedure (SOP) for UKVI's Central Operations staff, which states "ensure CMS shows the full case handling history, including visa section contributions and escalations" and that "The CMS record must not be closed" where a complainant has been sent a holding reply rather than a substantive reply. However, it unhelpfully introduces an element of ambiguity by adding:
- "Only in very limited circumstances, for example, where we are awaiting an action or resolution from a business area (and not where we are awaiting a contribution from either casework or policy colleagues), it may be appropriate to close the CMS record and create a Brought Forward Task. This decision should be referred to an HEO."<sup>38</sup>
- 6.100** Meanwhile, the Border Force Correspondence Team (BFCT) SOP instructs staff to:
- "Update CMS to show progress at each stage of the case, uploading the respective document, for example, FI,<sup>39</sup> Investigation, extension requests, 3DPA,<sup>40</sup> acknowledgement, internal/external chasers and interims."

### Detention Services Order 03/2015

- 6.101** DSO 03/2015 refers to the use of CMS by the Complaints Allocation Hub to "log the details of the complaint ... generating the unique reference number and target date for response" and to

---

<sup>38</sup> Higher Executive Officer.

<sup>39</sup> "FI" stands for "Further information", which is where the Home Office has to seek additional details from the complainant in order to be able to investigate the complaint and provide a response.

<sup>40</sup> "3DPA" stands for "third party Data Protection Action" and is where the Home Office requires the complainant to indicate that they have authorised a third party to engage with the Home Office on their behalf regarding the complaint.



“receive and upload complaint acknowledgement letter from service providers”. It goes on to say that Detention Services Customer Service Unit (DS CSU) will “Check the quality of responses and record findings of the quality assurance sampling on CMS.”

- 6.102** DSO 03/2015 does not refer explicitly to CMS being used to record a “full case handling history” but does note that the substantive response from the “service provider”<sup>41</sup> to the complainant should include the “detail of investigation and findings”<sup>42</sup> and this should be copied to DS CSU. The description of ‘File management and complaint storage’ arrangements in the Complaints Management Guidance appears to say that the CMS record will not be relied upon as the primary record of any complaint investigation carried out by a “service provider”. However, this may simply be a recognition of the fact that the latter do not have access to CMS:

“Records of complaints investigations conducted by contractors operating in places of immigration detention or providing escort services will be retained by the relevant contractor but may be viewed by the Home Office at any time.”

## UKVI Central Correspondence Team

- 6.103** In 2017, the re-inspection team found that CCT staff were clear about the requirement to use CMS to “record all steps taken in the handling of a complaint” and that CCT “was making good use of CMS to create an accurate record of the details of investigations and their findings.”
- 6.104** In 2019, inspectors were informed that CCT continued to make good use of CMS and that managers were dip sampling five CMS case records a day in order to check for any errors and to provide staff with feedback on their performance. Of the sample of 30 records examined for this inspection, 27 (90%) contained a copy of the response (two had no response and a third had the wrong response, although the correct response was sent to the complainant. CCT was not recording the automated acknowledgement email on CMS. In line with its Standard Operating Procedures, this was copied to a shared folder.

## Border Force Correspondence Team

- 6.105** The 2017 re-inspection found that BFCT was using CMS to upload complaints and responses but not to record the details of any investigation, which were routinely recorded in paper files. Inspectors were told that this was due to the “sensitive nature of Border Force complaints”, which could include the names of officers and details of Home Office systems. However, a BFCT senior manager admitted that there was also “a reluctance [from BFCT staff] to use CMS”.
- 6.106** The subsequent review by the Home Office Continuous Improvement Unit (CIU) recommended that BFCT “Increase capacity by utilising CMS to track complaints from receipt to resolution, eliminating manual filing and separate spreadsheets”. CIU reported in April 2017 and proposed that this recommendation be implemented within two months.
- 6.107** In 2019, inspectors were informed that BFCT no longer used paper files to record complaints. CMS was supposed to be used to manage the case from beginning to end and to record all correspondence. Correspondence officers in BFCT were responsible for triaging complaints, assessing the nature of the complaint and uploading the details onto CMS, including a copy of the complaint.

---

<sup>41</sup> Referred to elsewhere as “contractor” or “supplier”.

<sup>42</sup> Annex F of DSO 03/2015 is a checklist of issues which must be covered in the substantive response. This includes: “What the investigation involved (including the process that was followed, such as interviews with staff or others, examination of CCTV footage and/or relevant records etc).”

- 6.108** BFCT staff told inspectors that Border Force regions had access to CMS but seldom made use of it. They felt that the regions would benefit from a workshop on CMS, which BFCT would be happy to run. At Manchester Airport, Border Force managers and the team responsible for receiving, allocating and monitoring BFCT's requests to investigate a complaint said they were unaware of CMS but thought it would be useful to have access to it to see and learn from the responses BFCT sent to complainants. Similarly, at Heathrow Airport, inspectors were told that officers did not have access to CMS but could see the benefit of having it.<sup>43</sup>
- 6.109** Based on the sample of 30 Border Force records examined by inspectors for this inspection it appeared that BFCT was making use of CMS, but inconsistently. Of the 30 records, 14 were incomplete or wrong, including the incorrect due date for the response or the response not being recorded on CMS.
- 6.110** Inspectors reviewed these records with BFCT. Two particular issues emerged. Firstly, BFCT local instructions stated that where a complaint is received by email and fielded by UKVI's Central Correspondence Hub (CCH), there is an assumption that the complainant will have received an automated acknowledgement email, so BFCT feels there is no need to record this on CMS and neither does CCH. Secondly, there was a "glitch" in CMS where the e-form does not offer a way to save information without changing the due date for the response. BFCT regarded this as a training issue and told inspectors that the HEOs were carrying out additional dip sampling checks to ensure that the information was being entered correctly.
- 6.111** In January 2019, BFCT told inspectors that new guidance had been issued and monthly compliance testing had indicated a considerable improvement.<sup>44</sup> BFCT would continue with the monthly checks to ensure that the improvement was maintained.

## Detention Services Customer Services Unit

- 6.112** The 2017 re-inspection found that DS CSU was maintaining an audit trail of its monitoring of complaints handling, along with uploading e-mail chains to demonstrate when complaints were sent to the supplier for investigation, and when the complaint response was received.
- 6.113** However, based on the sample of 30 CMS records examined by inspectors, while DS CSU was maintaining a complete record of the complaint and the response, its quality assurance process was ineffective, since the responses contained grammatical errors, were poorly constructed and provided unclear answers to the points raised.

## Conclusion

- 6.114** The 90 sample records examined for this inspection suggest that although the complaints handling teams were, in most cases, using Complaints Management System effectively to record the full history of each complaint, the automated acknowledgement email aside, there were still some inconsistencies and some errors.
- 6.115** However, the sample size was small and may not be representative. To be confident that CMS is being used fully and correctly the Home Office needs to look at a wider selection of records and reconsider its guidance, training and, in particular, quality assurance regime in respect of CMS use in light of what it finds. It may also need to look at user access to CMS beyond the complaints handling teams, and at what it expects from these users.

---

<sup>43</sup> At the emerging findings meeting, inspectors were informed that three members of staff at Heathrow have "read only" access to CMS. Two are based in the Heathrow Secretariat and one at T3.

<sup>44</sup> Inspectors were not able to test this statement.



# Thorough and fair investigations

## Recommendation 7

- 6.116** Recommendation 7 concerned ensuring that a thorough and fair investigation was conducted into all minor misconduct complaints. The original inspection had found that minor misconduct complaints against UKVI and Immigration Enforcement staff were being passed to the relevant business area to respond, whilst checking that a substantive response had been sent to the complainant or that the Case Management System (CMS) had been correctly updated.
- 6.117** File sampling had indicated that most Border Force service complaints were investigated thoroughly and fairly, but some minor misconduct cases were not, as Border Force was failing to pursue all reasonable lines of enquiry to identify the subject(s) of the complaint. Moreover, Border Force was misleading complainants by responding that it had not been possible to identify the officer(s) concerned when in fact it had taken the decision on grounds of proportionality not to check IT systems that would provide this information.
- 6.118** The Home Office accepted Recommendation 7 and committed to ensuring that “all reasonable steps” were taken to identify the subject of a complaint by reviewing guidance and ensuring that robust audit and assurance processes were employed.
- 6.119** The March 2017 re-inspection found that Recommendation 7 could be considered “Closed” for all three directorates. This was based on file sampling, which included evidence of the UKVI Central Correspondence Team (CCT) and Border Force Correspondence Team (BFCT), challenging business areas where they felt an investigation had not been thorough and fair, plus newly-issued instructions about which systems should be checked to identify the subject of a complaint, and sign off by a senior manager for all investigations of Stage 2 minor misconduct complaints.

## UKVI Central Correspondence Team

- 6.120** CCT is responsible for ensuring, where required, that a complaint is allocated to the correct business area within UKVI or Immigration Enforcement for a “positive contribution” investigation. It uses the Case Information Database (CID) to determine the correct business area. The process requires business areas to complete their investigation and respond to CCT within three working days (in-country) and five working days (out of country). The latter then uses what the business area provides to produce the substantive response to the complainant.
- 6.121** In focus groups held in March 2019, CCT staff told inspectors that delays in responding to complainants were often caused by business areas not responding to CCT within the required timescales: three working days (in-country) or five working days (out of country). The staff felt that some business areas treated complaints as more of a priority than others.
- 6.122** CCT managers said that while meeting the 20-day customer service standard for a substantive response was important for the reputation of the Home Office, so too was the quality of responses. The latter also meant that fewer complaints were likely to progress to Stage 2. They, therefore pushed back where a business area had not addressed the issues raised in the complaint, or was being overly defensive.

## Border Force Correspondence Team

- 6.123** The Border Force Correspondence Team (BFCT) Standard Operating Procedure (SOP) states that complaints requiring investigation should be identified and a commissioning email sent to the Secretariat of the relevant business area, attaching the complaint and a proforma to be completed and returned. The proforma requires the business area to provide details of the steps taken to identify the subject of a complaint and details of the investigation.
- 6.124** Inspectors were told onsite that BFCT's transition to a paperless process was intended to free up resources to assist business areas with their handling of complaints, however, since the transition when staff have left BFCT they have not been replaced. The Home Office later commented that this was incorrect and that since the transition to a paperless office in June 2017, in line with Recommendation 6, BFCT had "recruited three EOs to cover vacancies" and "BFCT has also increased headcount from two to three HEOs".
- 6.125** Based on the 30 CMS records examined by inspectors for this inspection, Border Force was conducting a thorough and fair investigation of the complaints it received. For example, it resorted to looking at CCTV coverage to identify the officer(s) who was subject of a complaint where it was not possible to do this by other means.

## Detention Services Customer Service Unit

- 6.126** Detention Services Order 03/2015 states that "every [Immigration Removal Centre] IRC supplier is required to appoint a manager with responsibility for ensuring effective systems and processes are in place for managing and investigating complaints relating to service provision or the behaviour of their staff". It also requires IRC suppliers investigating and responding to detainee complaints to ensure that the written response is subject to quality assurance by a second, more senior, person before being sent to the complainant.
- 6.127** Home Office Delivery Managers were supposed to provide a further layer of quality assurance by carrying out a monthly dip sample of responses and drawing the suppliers' attention to any that are unsatisfactory or escalating this to the Head of Detention Operations where it cannot be resolved locally. Inspectors were unable to see any evidence of this from the 30 DS CSU records on CMS examined as part of this inspection.

## Conclusion

- 6.128** Inspectors were content that each of the complaints handling teams recognised the importance of any investigation of complaints being thorough and fair and were prepared to challenge business areas where they were not satisfied. The judgement by CCT managers that the quality of the substantive response was as important as meeting the 20-day service standard is a sensible one, provided the complainant is kept informed of the progress of their complaint and that the timescale is not allowed to become open-ended once the 20-day target has been missed.

# Ownership

## Recommendation 8

- 6.129** Recommendation 8 concerned the “ownership” of complaints and substantive responses. It argued that ownership should remain with a dedicated complaints team throughout, and that the latter should be properly resourced and empowered to require contributions from the relevant business area, where necessary. In this way, compliance with guidance would be ensured and there would be greater consistency and better-quality assurance of complaints handling.
- 6.130** The recommendation, which was aimed primarily at Border Force, was “partially accepted”. In its formal response, the Home Office committed to ensuring that “all complaints are handled within a centrally assured framework of quality and timeliness” either by central correspondence teams or by others (in practice by the relevant business areas), but to an equivalent standard, with a stronger auditing and assurance regime. The Home Office also undertook to review its structures and processes for handling complaints.
- 6.131** In 2017, the re-inspection found that Recommendation 8 could be closed for UKVI’s Central Correspondence Team (CCT) and for Immigration Enforcement’s Detention Services Customer Service Unit (DS CSU), but not for Border Force where the Correspondence Team (BFCT) was still not complying fully with guidance and not using the Complaints Management System (CMS) efficiently to record, track and manage complaints and response. BFCT’s move to the Director General’s Secretariat in July 2016 had not embedded effective complaints handling into the culture of Border Force and re-emphasised customer service. Overall, the impression was that complaint handling remained a low priority within the directorate, with the 20-day service standard routinely missed and effectively disregarded.

## Border Force

- 6.132** Following the move of BFCT, the Director General’s Secretariat had hosted a monthly “lessons learned” session with senior managers. This was used to highlight areas for improvement and to agree actions. However, in March 2019 inspectors were told that there had been no such sessions for over a year.
- 6.133** While some streamlining had been achieved by making more efficient use of the Case Management System (CMS), and by no longer relying on paper files, the BFCT team told inspectors that they still felt separate from the rest of Border Force and referred to an “us and them” culture. This was not helped by where they were based (in Dover, Croydon and Ipswich), and that they had limited opportunities to visit the regions and engage with staff directly about the common causes of complaints.<sup>45</sup>

## Conclusion

- 6.134** This inspection has identified a number of performance issues with complaints handling across the BICS, not least its routine failure to meet the published service standard. Some of the issues relate to the three complaints handling teams, and each would benefit from a fresh look at staffing levels, working practices and quality assurance measures. However,

---

<sup>45</sup> At the factual accuracy stage, the Home Office commented that: “Senior Managers did say that staff had been provided with opportunities to visit ports to develop their understanding of Border Force processes. Guest speakers from ports and policy areas had also delivered presentations at team meetings and regular contact was made with Regional Secretariats by telephone to check understanding.”

the greater concern is whether “operational” business areas recognise that responding efficiently and effectively to complaints, which includes learning from them, should be a high priority for them.

- 6.135** The sixth and final ICIBI ‘Expectation’ concerns ownership. Where Recommendation 8 looked at the ownership of the complaints process at the working level within each directorate, the ICIBI ‘Expectation’ (see Annex B) is aimed at overall ownership of particular functions within BICS.
- 6.136** Ultimately, the risks from inefficient and ineffective complaints handling, which are mostly reputational in the first instance, but with the potential to escalate and impact politically, legally and financially, have to be owned at the BICS (or Home Office) level rather than by individual business areas or even directorates. On the evidence of the inspections in 2016, 2017 and now in 2019 it seems unlikely that the directorates will make meaningful and lasting improvements in their handling of complaints without this.

## 7. Correspondence from Members of Parliament

### Background

- 7.1** The Home Office receives correspondence (“requests”) from Members of Parliament in the form of letters, emails and telephone calls. Most of it is on behalf of constituents who have a complaint they wish the MP to raise on their behalf. The complaint may already have been made directly to the Home Office, but MPs told inspectors they were finding that constituents were increasingly coming to them in the first instance.

### Volumes

- 7.2** The 2016 inspection report quoted the latest available figures for MP correspondence:
- “In the first half of 2015, the MP Account Management Teams<sup>46</sup> received 8,129 letters and 8,156 emails from MPs or their staff. In addition, they received around 320 telephone calls per week.”<sup>47</sup>
- 7.3** Assuming that these figures were replicated for the second half of 2015, the annual totals would have been 16,258 letters, 16,312 emails and 16,640 telephone calls, or roughly 50,000 items of correspondence.
- 7.4** According to Home Office data, in the first six weeks of 2019, 9,759 written or telephone enquiries were received from MPs, an average of 1,626 a week. This was around 5% above the Home Office’s forecast for the period, and a 2% increase on the average weekly intake during 2018. Looking at the 12 weeks from 26 November 2018 to 11 February 2019<sup>48</sup> the linear trend was upwards. However, even if the linear trend were flat it would result in almost 85,000 requests during 2019.<sup>49</sup>
- 7.5** These figures appear to confirm the view expressed by those MPs who responded to the ICIBI’s ‘call for evidence’ that representing the interests of their constituents with the Home Office was taking up more and more of their time.

### Preferred means of correspondence

- 7.6** In mid-2015, inspectors were told that MPs Account Management unit (MPAM) was encouraging MPs and their staff to use the telephone support service (referred to by some MPs as the “hotline”) in order to reduce the volume of written correspondence and that, at the end of July 2015, a new operating model had been introduced that would deliver:

---

<sup>46</sup> MPs Account Management is part of UK Visas and Immigration’s Customer Services Operations.

<sup>47</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/547700/ICIBI-report-on-Complaints-1-March-2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/547700/ICIBI-report-on-Complaints-1-March-2016.pdf)

<sup>48</sup> The latest period for which figures were available at the time of the inspection.

<sup>49</sup> In April 2019, senior managers told inspectors that a total of 83,000 requests had been received in 2018-19.

- “• faster and more streamlined interaction with MPs, delivered through greater outreach and by encouraging MPs to send fewer hard copy letters and instead make more use of email and telephone calls; and
- efficiency savings of 28%”.

- 7.7** The previous inspection team was also told that 80% of enquiries were received by telephone or email<sup>50</sup> and over 90% of responses were provided by telephone, email, or face-to-face by MPAM team members visiting MPs’ constituency offices. But, a senior manager was concerned that “following the restructure, resources were ‘very tight’ and that the greatest risk to performance was that the number of letters and emails received would be greater than had been forecast.”
- 7.8** Inspectors did not track the forecasts, intake and MPAM performance between mid-2015 and the end of 2018. However, for the week ending 11 February 2019, the Home Office reported that written requests (letters and emails) made up 78% of the total (of 1,642). This was higher than it had allowed for in its planning assumptions. The latter had assumed (wrongly) that the percentage of written requests would reduce compared with 2018.

## MP Account Management

- 7.9** In 2015, MPAM consisted of two regions; MP Account Management Operations North and MP Account Management Operations South, comprising six teams (five in the North and one in the South), each covering a geographical area and each managed by a Senior Executive Officer (SEO). At the time of the current inspection, the structure of MPAM had changed. There were two teams: MP Operations and MP Engagement.
- 7.10** Under the current structure, the role of MP Operations role was “to maintain and improve the performance of MPAM teams to meet or exceed the service standard of responding to MP correspondence within 20 working days through the most cost-effective means”. This would be done “by the professional development of the MPAM cadre and delivery of specific interventions to improve capability, productivity, timeliness and quality” and by “ensuring that all activity complies with Standard Operating Procedures and that insight gained from correspondence activity is shared and utilised for business improvement.”
- 7.11** Inspectors were provided with the most recent organogram for MP Operations. This was dated December 2017. It showed that the team was led by a Grade 7, with four SEOs, each of whom managed a region – see Figure 4.

---

<sup>50</sup> The figures for the first half of 2015 indicated that before the introduction of the new operating model around two-thirds of the correspondence received was via telephone calls and emails.

**Figure 4: MP Operations: December 2017**

Region	Area	HEO <sup>51</sup>	EO <sup>52</sup>	AO <sup>53</sup>
1	London & South East	5	21	3
2	North West	2	8	1
2	South West & Wales	3	12	0
3	Midlands & East	3	12	1
4	North East, Yorkshire & Humberside	1	9	1
4	Scotland & Northern Ireland	2	9	1

- 7.12** As at December 2017, there was also a team that dealt with HM Passport Office and the Border Force Correspondence Team (BFCT), which was under the management of the London & South East SEO, and a 'Windrush Team', which was under the management of the regional SEO responsible for North East, Yorkshire & Humberside and Scotland and Northern Ireland. The former comprised one HEO and five EOs, while the 'Windrush Team' comprised two HEOs, six EOs and one AO.
- 7.13** Inspectors were told that the role of MP Engagement was "to sustain and improve the relationship with MPs through national engagement". It did this "by leading and promoting effective outreach to MPs with a vision of reducing intake and encouraging channel shift promoting self-serve and telephone service". It also led "overall engagement with BICS business areas to ensure effective working relationships and information sharing, including early warning and insight" and liaised "with Private Office & Director's Offices on high profile cases and issues and oversee PQ responses relating to MP correspondence."
- 7.14** According to the December 2017 organogram, the MP Engagement team had two Grade 7s, one responsible for engagement and one leading a 'Change Programme'. Inspectors were told that the latter intended to deliver a series of improvements to enhance the structure of MPAM and help it move to a "national delivery model". It also included a new Learning and Development programme, a revised Quality Model, and new tracking, monitoring and assurance tools.
- 7.15** The same organogram showed the 'Engagement' Grade 7 managing a Correspondence Quality Team, comprising one HEO, three EOs and two AOs. This team was responsible for ensuring that responses addressed all the points raised and met the Home Office's quality standards. The team provided feedback to responders, copying in line managers where target dates or quality standards had been missed, or where drafts were exceptionally good, for example, where they had dealt with a particularly complex request in good time and to a high standard.
- 7.16** The 'Engagement' Grade 7 also managed two SEO Account Managers. Inspectors were told that at one point there had been seven SEO Account Managers. It was unclear when the numbers had reduced or the reasons for this. However, in discussion with inspectors, MPAM senior managers said they recognised that more could be done to improve communications with MPs' offices, but they believed that this responsibility should be shared with other BICS business areas, who should be engaging directly with MPs' offices, with MPAM providing the necessary training and support.

<sup>51</sup> Higher Executive Officer.

<sup>52</sup> Executive Officer.

<sup>53</sup> Administrative Officer.



## MPs Account Management (MPAM) Standard Operating Procedures

- 7.17** Version 01 of ‘MP Correspondence Standard Operating Procedures’ was published (internally on the Home Office intranet) on 25 January 2019. It sets out:
- “the **overarching processes** the MPAM teams must follow when responding to enquiries from MPs, Lords, Members of Devolved Legislature and Members of the European Parliament from their constituents.”
- 7.18** The guidance applies to “written correspondence” containing enquiries “linked to an individual case or operational policy; where it relates to the BICS operational activity (UKVI, Border Force (BF), Immigration Enforcement (IE) and HM Passport Office (HMPO)).” It states that “MPAM teams do not deal with enquiries about Home Office Policy, as the Direct Communications Unit handle these” but offers no further explanation of the distinction between “operational policy” and “Home Office Policy”.
- 7.19** The guidance refers to the Cabinet Office’s “cross-Government target for departments to respond to MPs correspondence within 20 working days of receipt”, and to “the published Service Standard”.<sup>54</sup> It sets out a timeline for progressing cases, detailing the actions for MPAM responders and managers, relevant business areas, quality assurance managers, Senior Civil Servants (SCS), Special Advisers and (the Minister’s) Private Office.
- 7.20** It informs MPAM staff that they are responsible for meeting the timeline and for escalating matters “where they encounter obstacles”, and notes that “MPAM Teams have an internal target of completing a quality-assured draft within 10 working days of receipt.” However, it also states that “the overriding priority is for any issues raised in the correspondence to be dealt with to a high standard.”
- 7.21** The remainder of the guidance “gives an overview of each stage of the process”, covering receipt of the correspondence; initial assessment, uploading to the Correspondence Tracking System (CTS)<sup>55</sup> and allocation to an MPAM team by UKVI’s Central Correspondence Hub (CCH); triage and sourcing of contributions for the response; drafting the response (including checking with the MP’s office “if a verbal response is acceptable”; escalation (if necessary); and, quality assurance (including uploading the approved draft to CTS).
- 7.22** There is a separate section headed “High Profile Cases/Emerging Trends”, which requires such cases to be referred to the MPAM Engagement Lead “who will decide if further escalation to SCS is necessary” and flag any emerging trends to “the BICS Early Warnings Group,<sup>56</sup> via Central Operations Hub”.

## Performance

- 7.23** In 2015, the inspection found that the quality and timeliness of responses provided to MPs had improved significantly since 2010 when this had last been inspected.

---

<sup>54</sup> The guidance refers to providing a response “within 20 working days”. It does not explain that the Customer Service Standard is to achieve this in 95% of cases.

<sup>55</sup> Inspectors were told that there were plans to introduce a new system, Home Office Complaints System (HOCS), which would provide managers with better statistical data.

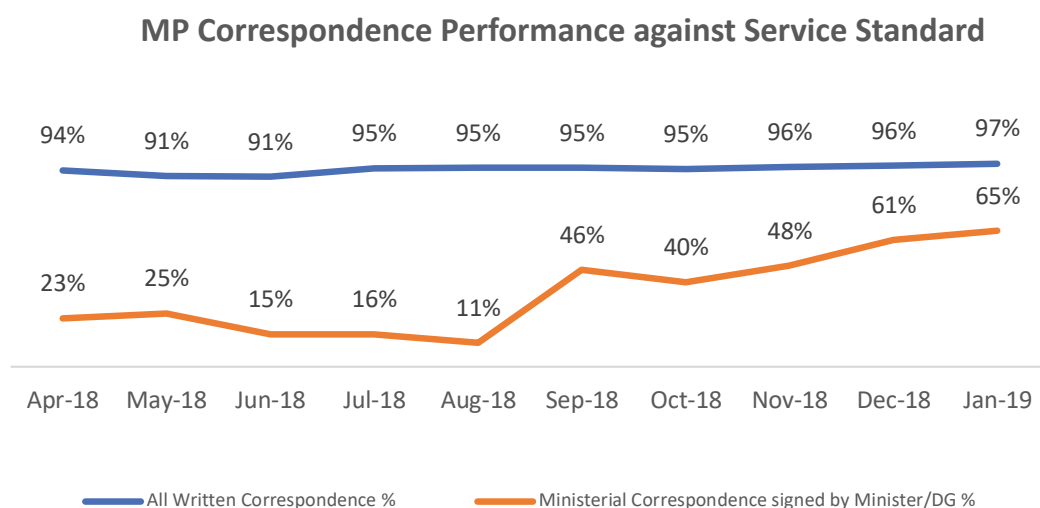
<sup>56</sup> ICIBI was informed that “the Warning and Reporting team in the BICS Hub was set up to identify and analyse emerging themes and trends across BICS. This is delivered through the monitoring of a wide range of data including; media reporting, PQs, and FOIs, litigation and appeals performance data, and monitoring of external criticism and recommendations from other bodies such as NGOs and stakeholders. This work is supplemented by the BICS Early Warning Working Group which was established by the Warning and Reporting team to identify issues or concerns with a reputational, financial and/or political impact and that cut across BICS.”



**7.24** Having failed to meet the service standard in any of the preceding four quarters, performance had consistently exceeded the published Customer Service Standard between 2014 Q4 (October-December) and 2015 Q2 (April-June).<sup>57</sup> Managers attributed this to the introduction by UKVI's Customer Service Operations (CSO) in 2014 of internal timescales for responses to emails and telephone calls that were shorter than the published 20-working days service standard. They believed that the provision of guidance on how to draft and a system of rigorous quality checks had also made a difference to the quality of responses.

**7.25** Figure 5 reproduces data provided by the MPAM team for the current inspection. It shows that the service standard for all written correspondence was met in each month between July 2018 and January 2019, having been missed in the three preceding months. But, while performance in relation to responses signed by ministers (or by a BICS Director General, which inspectors were told were relatively few) improved significantly in the second half of 2018-19, as at January 2019 it was still well short of the "95% within 20-working days" service standard.

**Figure 5: MP Correspondence Performance against Service Standard**



## Quality assurance

**7.26** Inspectors were told that ministerial responses are subject to three levels of assurance checking before they are submitted to the minister for signature.<sup>58</sup> For responses from the department, the quality assurance takes place retrospectively, and MPAM staff told inspectors that more emphasis was placed on meeting the service standard than on the quality of the response. However, senior managers argued that the retrospective quality assurance process was effective, and it also meant that staff felt trusted and empowered.

**7.27** MPAM staff said that one of the main difficulties they faced in providing an MP with a timely response was getting the input they needed from the relevant operational business area. However, Border Force senior managers told inspectors that some draft responses from MPAM were not well written and did not properly address the issues raised, so Border Force found itself having to redraft them, and this took time.

<sup>57</sup> The last figures available for the 2016 inspection.

<sup>58</sup> At the factual accuracy stage, the Home Office noted that these responses went through two levels of checking rather than three. During the inspection, inspectors were told that the three-level check was being reviewed with the possibility of moving to two levels.

## 2014-15 Feedback from MPs

- 7.28** The 2016 inspection report contained statistics from two Home Office surveys of MPs carried out in September 2014 and October 2015. While there were lower scores for the completeness of the answers received and the time taken to respond, overall satisfaction levels with the service provided by MPAM were high (84% and 91%). This was corroborated by ICIBI's own survey conducted in 2015, albeit the number of MPs (16) who responded to the latter was small, and therefore possibly not representative.
- 7.29** Inspectors were told that MPAM had not conducted an MP survey since 2017 and that the results of the 2017 survey had not been published.

## 2019 Feedback from MPs

- 7.30** In February 2019, ICIBI wrote to all MPs notifying them of the inspection and inviting their feedback. On this occasion, 11 responded. While the bulk of the comments concerned the need for improvements, MPs and their caseworkers also identified what (in their experience) was working well. The same areas were both criticised and complimented, in some cases by the same person, which pointed to an unevenness in the service MPs were receiving from MPAM.
- 7.31** The fact that BICS ("UKVI") had a central point of contact was welcomed and contrasted with the Department for Work and Pensions (DWP), where it was sometimes "a struggle" to get in touch with the right person. But the benefits of having direct contact with a local team were also highlighted: confirmation that cases had been received, adherence to timescales, good working relationships. And, one highly experienced MP stressed the importance of each region having its own regionally-based Account Manager.
- 7.32** As an example of the unevenness, one MP complimented the training their caseworkers had received from the Home Office, while another said that it would be helpful if the Home Office offered training, since other organisations did so, including the DWP. Perhaps unsurprisingly, the former referred to receiving responses "in a timely manner" and being kept updated by telephone, while the latter complained about delays. Overall, the view was that the Home Office could do more to help MPs to help their constituents, possibly by making more information available online, including making it clear that involving one's MP was not "a magic bullet". Acknowledging that it was not feasible to provide a running commentary on applications, one suggestion was the creation of a secure portal via which individuals could obtain updates.
- 7.33** Delays in providing decisions, including "breaches" of service standards where these existed, were the root cause of most complaints from constituents, along with the retention of essential travel documents for long periods, badly communicated decisions and misleading advice. Cost and value for money were concerns, both the original cost of applications and the cost of follow-up email or telephone enquiries. This echoed the hundreds of submissions ICIBI received from individuals and stakeholder groups in 2018 regarding the fees charged by BICS for its services and products, and the poor service offered in return.<sup>59</sup>
- 7.34** Constituents were turning increasingly to MPs "because public methods do not seem to be working, with correspondence from applicants/their legal representatives going unanswered, difficulties with getting urgent messages across, or constituents unwilling or unable to use

---

<sup>59</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/792682/An\\_inspection\\_of\\_the\\_policies\\_and\\_practices\\_of\\_the\\_Home\\_Office\\_s\\_Borders\\_Immigration\\_and\\_Citizenship\\_Systems\\_relating\\_to\\_charging\\_and\\_fees.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792682/An_inspection_of_the_policies_and_practices_of_the_Home_Office_s_Borders_Immigration_and_Citizenship_Systems_relating_to_charging_and_fees.pdf)

premium rate telephone numbers". In addition, "solicitors are often advising their clients to contact the MP or are sometimes making contact themselves ... due to severe delays in receiving a determination to the visa application".

- 7.35** The timeliness and quality of the responses received by MPs varied. Some MPs referred to responses that were both timely and informative, and one noted that responses to passport enquiries had "improved substantially", although another said that the "MP hotline" for passport enquiries was not as knowledgeable and helpful as it had been 18 months earlier. Responses from ministers and Directors General were usually more detailed and more helpful, but the former often took two months to send a "not very official-looking" email and, having written to the minister, there was often pressure on an MP to accept a "local" response from UKVI.
- 7.36** Most of the MPs who provided feedback found the Home Office's responses unhelpful. In the case of enquiries about outstanding applications they "simply state that there are delays and offer no advice or information on the timescale in which the constituent can expect to receive a decision" or refer to the case as "complex" and therefore falling outside the service standard. More generally, responses were "very similar" and "predictable". There was an "overreliance on standard lines", such as "this case raises complex issues" and is "not subject to service standards", to the extent that one MP wondered whether the relevant business areas were actually consulted. A number of the MPs referred to vulnerable constituents. There was a concern that responses from the Home Office failed to take account of all of the welfare issues raised in such cases and demonstrated a lack of understanding.
- 7.37** As to timeliness, one wrote that it was possible to get a quick response where there were extenuating circumstances, for example "compassionate or compelling" grounds, but this was not the experience of others who found that responses where they had requested for it to be expedited still took 20 days, and that simple telephone enquiries were regularly met with "could you please put that in writing", as the staff taking the calls did not appear to have the knowledge or confidence to deal with the query themselves. Possibly more concerning, some of the advice received when MPs had called was misleading or wrong.
- 7.38** A senior caseworker for one MP asked how issues raised by MPs were fed back to senior management in BICS, not least as she had raised Windrush cases with UKVI "before the issue reached the headlines", and "they were given a standard reply which failed to consider the complexities of their situation". Similarly, the department had not responded to issues she had raised about "discrimination related to Employers Checks". This led to concerns that other systemic problems are not being addressed, despite being raised by MPs and their caseworkers.

## Referrals to the Parliamentary and Health Service Ombudsman

- 7.39** By law, the Parliamentary and Health Service Ombudsman (PHSO) can look at complaints about UK government departments and other UK public organisations only if the complaint is referred to PHSO by an MP. Inspectors understood that many, probably most, of these referrals involved complaints where the MP had failed to get a satisfactory answer from the department or organisation, but the Home Office commented that: "Our experience is that most PHSO cases have not gone through the MPs route first".
- 7.40** In 2017-18, PHSO received 1,102 enquiries about the Home Office, more than half (622) of which related to UKVI. A further 170 were about other BICS directorates: 92 about the Passport

Office; 61 about Border Force; 11 about the “Border Agency”,<sup>60</sup> five about Immigration Enforcement; and one about the General Register Office.

- 7.41** From 52 investigations of complaints relating to UKVI, PHSO “upheld” five and “partly upheld” a further 14 (37% combined). Twenty-seven were “not upheld” and the rest were “resolved without a finding” (four) or “discontinued” (two).<sup>61</sup> The largest initial causes of complaint were incorrect decisions and wrong or unclear communications, but most of PHSO’s investigations and most of the complaints it upheld were about responses to complaints being wrong and/or incomplete, and individuals receiving an insufficient personal remedy or apology.<sup>62</sup>

---

60 The UK Border Agency was superseded by Border Force, UKVI and Immigration Enforcement in 2013.

61 At the factual accuracy stage, the Home Office commented: “The PHSO has also acknowledged the successive fall in the upheld rate by the Home Office over successive years.”

62 See PHSO’s ‘Principles for Remedy’ <https://www.ombudsman.org.uk/sites/default/files/page/Principles%20for%20Remedy.pdf> and ‘Our guidance on financial remedy’ <https://www.ombudsman.org.uk/sites/default/files/Our-guidance-on-financial-remedy-1.pdf>

# Annex A: 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 his behalf.

The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions. However, functions exercised at removal centres, short-term holding facilities and under escort arrangements are excepted insofar as these are subject to inspection by Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectors of Constabulary (and equivalents in Scotland and Northern Ireland).

The legislation directs the Independent Chief Inspector to consider and make recommendations about, 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 section 19D of the Race Relations Act 1976 (c. 74) (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 him 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 he has 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 B: Expectations of the Independent Chief Inspector



## ICIBI's 'expectations' of asylum, immigration, nationality and customs functions

### 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 (Borders, Immigration and Citizenship System) ‘owner’**

- The BICS ‘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)



# Annex C: Evidence received from the Parliamentary and Health Service Ombudsman

Mr David Bolt  
Independent Chief Inspector of Borders and Immigration  
5th Floor  
Globe House  
89 Eccleston Square  
London SW1V 1PN  
*Sent by email*

6 March 2019

Dear Mr Bolt,

## **Re: Call for evidence**

I am writing to contribute to your call for evidence regarding the complaint handling of the Home Office's Borders, Immigration and Citizenship System (BICS).

We have looked at investigations into UK Visas and Immigration (UKVI), Border Force, Immigration Enforcement and HM Passport Office that we closed in 2017/18 and so far in this financial year.

In line with previous years, the majority of our investigations relate to UKVI rather than the other agencies. This means that we hold the greatest insight in relation to the former's complaint handling. It is important to note, however, that the relatively small proportion of complaints we handle about these organisations should be seen in the context of the vast number of interactions that they have with their customers every year.

Details on the statistical trends we see in relation to UK government departments and agencies, including the Home Office, are set out in our annual reports on this subject.<sup>63</sup>

The most common complaint handling themes we have seen are the following (although in some cases we found the organisation had already put right the original failing):

- Delays in responding to complaints;
- Not thoroughly investigating complaints or responding to the points raised by the complainant; and
- Not being 'open and accountable' – according to our *Principles of Good Complaint Handling*<sup>64</sup> this includes organisations not providing clear explanations for their decisions or actions when responding to complaints.

---

<sup>63</sup> Our 2017-18 report is available at: <https://www.ombudsman.org.uk/publications/complaints-about-uk-government-departments-and-agencies-2017-18-0>

<sup>64</sup> PHSO. *Principles of Good Complaint Handling*. Available at: <https://www.ombudsman.org.uk/about-us/our-principles/principles-good-complaint-handling>

Aside from these specific complaint handling issues, the fact that we upheld complaints about UKVI and the other agencies tells us that there is work that these agencies need to do to improve the way they handle complaints. When we uphold a complaint, it is because we found that someone had suffered an injustice and the organisation had not put this right. This may be because the organisation failed to identify a problem during their own investigation. Or, if they did, they did not acknowledge this and/or sufficiently recognise the impact on the individual and put things right.

A published summary of a complaint we investigated about Border Force and UKVI is annexed to this letter. We found that failings in how both organisations dealt with an individual and her complaint resulted in significant injustice for the complainant.

Our *Principles*, particularly our *Principles of Good Complaint Handling* and *Principles for Remedy*<sup>65</sup>, can help organisations to respond to complaints appropriately and put things right when things go wrong. More recently we have published guidance about the use of financial remedy to help put things right.<sup>66</sup> This can support organisations in determining suitable levels of financial remedies when responding to complaints locally.

One of our key strategic objectives is to work in partnership with others to improve how the public sector responds when things go wrong. We are committed to helping improve frontline complaint handling across the organisations we investigate and are leading work to progress this. I would be pleased to meet with you to discuss this further.

Yours sincerely,

Rob Behrens



**Rob Behrens CBE**  
Ombudsman and Chair  
Parliamentary and Health Service Ombudsman

---

65 PHSO. *Principles for Remedy*. Available at: <https://www.ombudsman.org.uk/about-us/our-principles/principles-remedy>

66 PHSO. *Our guidance on financial remedy*. Available at: <https://www.ombudsman.org.uk/sites/default/files/Our-guidance-on-financial-remedy-1.pdf>

## Case summary<sup>67</sup>

### UK Visas and Immigration's incorrect advice led to a series of injustices, including an order to leave the UK

In April and May of 2014, Mrs T sought advice from UK Visas and Immigration (UKVI) on whether her leave to remain in the UK would be affected if her husband, who is a British citizen, accepted a job offer overseas. Mrs T was assured that there would be no effect on her immigration status, provided they could prove their relationship was subsisting.

Having obtained this advice, Mrs T's husband accepted the job in June 2014. Mrs T remained and continued to work in the UK. In December of that year, Mrs T visited her husband overseas for Christmas and New Year. At the end of that visit Mrs T and her husband spent a few days together on holiday in the Middle East.

Mrs T returned to the UK from the Middle East on 3 January 2015 but was detained at Gatwick Airport by Border Force. She was held for 12 hours whilst Border Force examined her status, which included interviews and searches of Mrs T's baggage. Border Force concluded that as Mrs T was not entering the UK to live with her husband, and as he was not physically present in the UK, there had been a change to her circumstances since she had been granted her last leave to remain in the UK. Border Force cancelled Mrs T's leave to remain in the UK and served her with a removal decision which said she had to leave the UK on 17 January 2015 and return to the Middle East. They also told her that she would no longer be entitled to work in the UK, unless she lodged an appeal against their decision and engaged a solicitor to help her resolve the matter. Border Force allowed Mrs T into the UK temporarily pending her appealing against the decision.

However, despite being told that she would be able to resume working in the UK if she lodged an appeal, Border Force's acknowledgement letter to Mrs T's appeal stated she was not entitled to work. Mrs T complained through her local MP to the Home Office about incorrect advice she had received regarding her status and her treatment by Border Force. The restriction on Mrs T to work was lifted in February 2015 and she immediately returned to work. However, the restriction was later put back on Mrs T erroneously in May 2015 and despite Mrs T and her MP trying at length to get this decision corrected, it was not until September 2015 that Border Force lifted it. As a result of these restrictions, Mrs T was unable to work for over five months during 2015.

In December 2015, HM Courts and Tribunals Service decided Mrs T's appeal in her favour. Although her immigration status was now restored and she was back at work, Mrs T still had not had been able to resolve her complaint to the Home Office from January 2015.

Our investigation found failings in how both Border Force and UKVI had dealt with Mrs T and her complaint. We concluded that these failings had resulted in significant injustice for Mrs T. To put things right for her, we made a number of recommendations to UKVI and Border Force which both

---

67 PHSO. *Complaints about UK government departments and agencies, and some UK public organisations 2016-17*. Available at: <https://www.ombudsman.org.uk/publications/complaints-about-uk-government-departments-and-agencies-and-some-uk-public-1>

organisations accepted. UKVI wrote to Mrs T to apologise for providing her with incorrect advice when she made enquiries about the impact of her husband taking a job overseas would have on her immigration status and for the delay in resolving her complaint. They paid her £1,600 in respect of her solicitor's fees for the appeal she was compelled to make and £500 in recognition of the distress and inconvenience she experienced as a result of their errors when dealing with her case throughout. Border Force compensated Mrs T for her lost earnings during the time she was unable to work and other costs and paid an additional £100 in recognition of the distress and inconvenience she suffered.

## Annex D: Recommendations made by Liberty

- An independent complaints officer should be in each immigration detention centre to facilitate complaints, ensure lessons are learnt and change is implemented.
- More should be done to ensure complaints result in the detention estate changing practices and learning lessons. Individuals in detention should be able to have confidence in a system that not only has the capability to find in their favour but resolve their issue and effect change.
- Complaints are not handled quickly enough. Shorter timeframes should be set for investigating complaints.
- Training should be provided to all staff on the power dynamics inherent in the relationship of an individual in detention to those employed by the detention centre. Where staff are implicated in a potential complaint they should step aside and allow a welfare officer (or an independent complaints officer) to handle the concerns raised by an individual in detention.
- Individuals in detention should be regularly reminded of the procedure and encouraged to file complaints. Simply providing information at induction is insufficient, particularly given the emotional state a person is likely to be in at that point and given how frequently DSOs can change.
- Where a civil claim for damages arising from ill-treatment inside a detention centre is settled, the Home Office complaints team should be notified to determine if there is an underlying concern that would have been suitable for a complaint and if so, determine if action needs to be taken to improve conditions or learn lessons.
- The Section 84 form should either provide for non-governmental organisations to state they are only assisting with complaints; or, a separate form for assisting with complaints should be provided.

# Acknowledgements

The inspection team is grateful to the Home Office for their cooperation and assistance during the course of this inspection and appreciate the contributions from staff who participated. We are also grateful to the stakeholders who participated.

## Inspection Team

Overseeing Inspector	Paul David
Lead Inspector	Charlotte Savvides
Project Manager	Philip Hallwood
Inspectors	Joy Worrell

