

UKVI RESPONSE TO APPGs REPORT ON VISA PROBLEMS FOR AFRICAN VISITORS TO THE UK

To improve the application process:

1. Introduce an expedited application process for those applicants who currently have to travel to a neighbouring country to apply and/or be interviewed for a visa, recognising the increased difficulties they face because of the lack of a VAC in the country of application.

The attached Annex sets out the current application point coverage in Africa. UKVI operate a total of 39 application points across 29 states in Africa. Due to a range of security, logistical and commercial reasons, there are currently 25 African states where there is not currently a visa application point and customers need to apply in an alternative location.

Customers who wish to keep their passport during the application process can also choose to use the Keep My Passport When Applying service at 15 application centres in Africa and UKVI is working continuously with our Commercial Partners to expand the number of locations at which this service is available and on improvements to the service.

UKVI operates a 15-day global customer service standard for visitor applications which is comparable to or faster than the service offered by many other countries. There are also faster options available if an applicant chooses to use Priority or Super Priority services which are on offer in many application points in Africa.

UKVI will also continue to pursue medium to longer term options to make the visa service more directly accessible to customers through moving to greater digital provision of services under our Future Border Immigration System programme of work which will in the future potentially reduce the need for some customers to attend in person at visa application points.

2. Provide clearer and more detailed information to applicants on visa application processes and requirements, especially in terms of supporting documents that must be submitted by the applicant. Greater efforts should be made to make clear the timescales required, such that applicants know if they are submitting an application which is unlikely to be processed before the date of travel.

While there are some documents that are required for specific types of visitors (such as for those coming for private medical treatment or as prospective entrepreneurs), other than a passport/travel document, there are no mandatory supporting documents required for anybody applying to come to the UK as a general visitor for tourism, on business or to visit family.

UKVI have though taken account of the feedback of the APPG and other stakeholders and in July 2020 a document checklist was added to the global online process for all visitors to help applicants identify what documents they might choose to submit.

Work is also ongoing to improve the guidance for those applying for a standard visitor visa in the context of forthcoming changes as part of our Future, Border and Immigration System programme and the relevant pages on Gov.UK will be updated to make clearer those documents an applicant can choose to submit.

UKVI's global customer service standards for processing visitor applications is 15 working days for applications. Where fixed application points are operated customers are also provided with a service standard by UKVI's Commercial Partners of receiving free appointments within 5 working days.

Clearer guidance has also been drafted to inform applicants of our global customer service standard. The guidance for all applicants to check how quickly they will receive a decision across all categories of UK visa applications applied for outside of the UK was updated on 10 December 2019. Work is also underway to introduce digital capabilities to enable an applicant to check the status of their application during processing.

In certain parts of Africa, the turnaround times, particularly for the Priority Visa service, have sometimes fallen short of UKVI's advertised service standards of receiving a decision within 5 working days. This is partly because of the unreliability of courier routes across the continent. UKVI has been working with our Commercial Partners to focus on improving this throughout the year through changing courier routing, printing visa vignettes in secure locations closer to the point of application and increased scanning documents on site. Further details are contained in the response to Recommendation 3.

3. Where decision-making is fully digitized, ensure documents are scanned in the country of application, allowing applicants to keep their documents if they wish.

Since early 2020 all customers globally, including in Africa, have had have the option of digitally submitting their supporting evidence and documents themselves free of charge.

Where a customer follows this process, they are not required to submit any supporting documentation except for their passport or travel document when they make their visa application in person. The passport or travel document is still required for submission for it to be endorsed with a vignette where a decision is made by UKVI to issue a visa. Where a customer may want to keep their passport during the decision-making process, in many locations they are able to use the Keep My Passport When Applying service as set out in response to Recommendation 1.

Where customers do opt for the scanning service that UKVI's Commercial Partners offer at an application point, the scanning takes place on site or at the nearest scanning hub. Once scanned, documents are then returned to the customer directly or by courier. UKVI's commercial partner in Africa has already introduced more on-site scanning at locations for example in Cameroon, Sierra Leone, and Senegal.

UKVI intend as part of a contractual obligation for scanning to be rolled out by its Commercial Partners to all application locations in Africa and globally during the remainder of 2020.

4. Increase the number of countries with VACs, or else look to use local FCO facilities, or establish partnership arrangements with other countries to share facilities.

The location of Visa Applications Centres (VACs) is determined by a global approach based upon objective criteria which include application volumes and in conjunction with the Foreign, Commonwealth and Development Office and other stakeholders.

UKVI continually reviews its global visa operation to improve performance and ensure it continues to deliver fast and fair decisions to customers. Our focus is on maintaining, and where financially and commercially possible, extending our reach to enable customers to be able to make their visa applications as easily as possible. Where customers do not have a visa application point in their country of residence, this is generally because the volume of applications received from these countries is extremely low and may not be commercially or financially viable. Further work is being taken forward to review our overseas network and ensure we are assessing customer demand and accessibility of our services. We would therefore welcome views from the APPGs on specific locations which you believe should be considered.

The attached Annex sets out the locations in Africa where UKVI through its Commercial Partners or other providers runs a visa service point. UKVI recognises the difficulties posed to customers from countries in Africa without application points and continues to work with our Commercial Partners to mitigate disruption to the customer journey, offering pop-up application points during peaks of student demand, for example in Mauritania (Nouakchott) and Gabon (Libreville). There are also on demand discretionary services noted in the attached Annex in Seychelles (Victoria) and Morocco (Casablanca).

UKVI also continues to examine our regional application point network with our commercial partner in Africa and is currently exploring the viability of offering further commercial partner-run on-demand services in several new locations in the Africa region, so that there are visa application points in countries where currently our Commercial Partner does not have a presence.

Our Commercial Partners currently share premises and operate a number of application centres in Africa jointly with partner countries such as France, Belgium and Germany. UKVI are also exploring the possibility of expanding this model further with our Commercial Partners, for example in Gabon, and will continue to do so where opportunities arise. UKVI are also testing options for kiosk biometric enrolment locations which would not need to be in a VAC.

To improve decision-making:

5. Strengthen quality control systems for rejection letters before they issue, in particular to ensure the supporting evidence has been fully taken into account, and that Visit Visa Guidance is changed to prevent prejudicial/biased assumptions being taken into account in reasons for refusal letters.

As the then Immigration Minister, Caroline Nokes, acknowledged when she attended the launch of this report, there are areas in UKVI's decision quality where continuous improvement is needed. UKVI's training and quality assurance reviews focus on giving appropriate weight to all relevant factors so applications are assessed correctly against the immigration rules and our decision-makers get the decision right first time.

The Entry Clearance Officer (ECO) must assess the applicant's credibility and intentions to visit the UK and must be satisfied an applicant is a genuine visitor. The visitor guidance which sets out how an ECO should make their assessment can be found on Gov.UK. There is no place for prejudice or bias in assessing any visa application and the guidance makes that clear.

UKVI have also recently reviewed their approach for assuring the quality of their visitor decisions and have moved to a new system of Decision Assurance Reviews. This includes a mandatory undertaking to review applications from customers which have been previously refused within the last 3 years, those which are linked to high profile events and at least a 10% randomised quality assurance review of all decision making. These are just some of the review framework requirements all of which are designed to ensure refusal decisions are proportionate and justified.

6. Where there is clear and compelling evidence that a visit is fully-funded by a credible UK-based sponsor, either remove the requirement for the applicant to submit bank statements and prove affluence, or else publish the evidence-base establishing the causal link between poverty and visa overstays.

Many visitors, in particular tourists, do not have a sponsor in the UK and the immigration rules for visitors focus on the applicant's circumstances, including their intention to leave the UK at the end of their visit.

There are no mandatory supporting documents required for anybody applying to come to the UK as a general visitor for example for business, tourism, or to visit family. As mentioned in response to Recommendation 2, UKVI have changed the online process for all visitors to help applicants identify what documents they might choose to submit.

While many applicants choose to submit a bank statement as evidence of their circumstances and their ability to support and maintain themselves in the UK, there may be other, more appropriate ways for an applicant to demonstrate that they meet the requirements of the rules.

A third-party guarantee is not legally enforceable and so decision makers take all factors of a case into account when making their assessment against the rules. However, UKVI recognise highly trusted sponsors are different, and in respect of visitor applications from

highly trusted sponsors in the academic/scientific/research/cultural communities, UKVI issued new operational guidance in May 2019 to decision makers, reminding staff to ensure due consideration is given to sponsorship, particularly with regard to organised events.

UKVI has received positive feedback from a range of stakeholders about the impact of this operational guidance. It is worth highlighting in this context the work of UKVI for the January 2020 UK-Africa Investment Summit, which brought together over 1,700 delegates, including 21 African delegations, CEOs and senior representatives from African and British businesses, as well as senior figures from multilateral institutions. This is the first-time governments and businesses from the UK and Africa have come together for an event of this scale. The role of UKVI was crucial in ensuring the smooth and successful attendance at the Summit of the country delegations.

7. Support greater input from High Commissions and Embassies into the decision-making processes as a matter of course. Streamlined processes should be explored to speed up and simplify the process for VIPs.

There are long-standing mechanisms in place for our partners across government to alert us to visa applications they wish to support or in which they have an interest. UKVI Regional Directors and their teams work closely with FCDO counterparts at overseas missions.

UKVI officials are also in the process of building on existing relationships with FCDO to increase the mechanisms through which UKVI and FCDO can make strategic decisions about the global visa service. These will provide a vehicle for collaborative discussion and decision making on key themes across the network - for example the Africa network could be one such theme, the future VAC network another - ensuring alternative suggestions and solutions are considered where viable, in line with wider HMG priorities and within the parameters of what is logistically and commercially viable. The expectation is to get the first of these groups up and running before the end of this year and FCDO colleagues are already engaged in supporting this process.

UKVI fully recognise the importance of making the decision-making process as swift and as straightforward as possible for all customers and not just high value customers. The APPG report states that the experiences of some applicants *“tend to give rise to an impression that the UK wishes only to grant visas to wealthy visitors and that the poor need not apply”*¹ This is not the intention of the immigration rules and those rules should apply to every applicant regardless of their access to senior diplomats.

8. Reinforce the role of the Inspectorate and monitor the implementation of the Inspector’s recommendations, together with a more systematic relationship between the Chief Inspector and the relevant Parliamentary Select Committee.

The Home Office is committed to improving all areas of the Border, Immigration and Citizenship System and is committed to the implementation of recommendations made by the Independent Chief Inspector of Borders and Immigration (ICIBI) that are accepted.

¹ APPG Report Page 24 Paragraph 3.3

The Department monitors the implementation of ICIBI open recommendations through regular reviews and shares regular progress updates with Ministers and with the ICIBI directly. Further, the ICIBI's inspection plan consists of a number of re-inspections to formally review aspects of the system and determine whether the Chief Inspector is satisfied to record his earlier recommendations as closed.