



# Service Standard Review

## Background

UKBA strives to provide a high level of service for all our customers and continually seeks to improve the level of service provided. Temporary Migration Operations Director, Neil Hughes has tasked a small working group to review current service standards and to establish whether they meet customer expectations in terms of providing the right level of information.

We have created a brief questionnaire to support the review and it would be helpful if you could answer each question openly. This will allow us to coordinate and analyse feedback and subsequently make recommendations to enhance current service standards.

## **RESPONSE OF THE IMMIGRATION LAW PRACTITIONERS' ASSOCIATION**

*NB – Difficulties with formatting have led to uneven page breaks in this document. Please scroll right to the end to read.*

### **Questions**

- **Have you submitted/supported an application within the last six months?** Yes

This response is submitted by the Immigration Law Practitioners' Association and reflects information provided to ILPA by members, who have, in the last six months, made the full range of applications.

- **What route did you apply under / predominantly support an application under?** Choose an item.

All, see above.

## Customer Knowledge

### 1. Do you know how long it will take for a decision to be made when you submit an application? No

- Service Standard times run from the date of biometric enrolment and one does not know how long that will take. As we understand it, service standards run to date of decision and the decision then has to be posted out.
- Decisions are not being taken within service standard times.
- Public Enquiry Office applications, which are supposed to be turned around on the same day, are frequently not.
- The Immigration Enquiry Bureau will not provide any information until an application has been outstanding for six months. This time limit bears no relationship to the service standards, let alone to the need that people with personal and professional commitments have for information.

### 2. Do you know what our service standards are for each workstream?

Yes

This is ILPA's position as an organisation, but we should say that some members are clearer than others about what the standards are.

### 3. Do you understand our service standards? No

- We want to see service standards that make it possible to tell a client how long their application will take and how long before they can travel etc.
- We do not want dead periods in an application not covered by service standards. We are irked that service standards apply only from the date of biometric enrolment. An applicant must request biometric enrolment within 14 days, therefore it is possible to build 14 days into the service standard. If this is not considered acceptable then the alternative to provide a separate service standard for the period from application until the Agency sends an invitation to biometric enrolment.
- We want to see, as is the case in the international group, not only standards for 90% of applications but for 100%. Otherwise, when a case goes beyond the service standards it risks becoming not a priority and waiting for a very long time.

### 4. How do you think they are measured?

We assume that they are reported by staff either manually or with the back-up of software. But perhaps we have not understood the question.

**5. Are you aware that the service standard for Tiers 1, 2, 4 & 5 is only measured once the biometrics are taken? Yes**

**6. Do you know what information is available on the UKBA website in relation Service Standards? Yes**

This is ILPA's response as an organisation. This would not be the case for all members.

Is it the right level of information? No

**7. Are the way that service standards are measured, meaningful? No**

See above. What is meaningful to an applicant is to know how long before they have a final decision, the documentation for which they have applied, and the ability to live their life as a person with leave in the category for which the application has been made.

**8. Do you know how to check the status of your application? No**

"Pending" is not a useful thing to know. Not being able to get information until an application has been outstanding for six months (see above) is not useful.

## **Customer Expectations**

**1. What information do you need to help you understand how UKBA are performing against their Service Standards?**

Sensible standards, covering the end to end process and telling a client what they need to know.

Clear information on what those standards are.

Standards for 100% of applications so that we can see how long the longest are taking.

Where averages are given we wish to see mean, median and mode. Distribution curves are also useful. Narrative commentary is also useful. It is useful to be able to understand past performance as an indicator of future performance – and narrative is needed for this.

*Text continued but text box will not flow over onto this page:*

We should like to emphasise how useful it is to see information on how long applications are taking, processing times as is done for entry to clearance. This does not make a commitment but gives an indication that is incredibly helpful in managing clients' expectations and which clients can use to decide whether they had rather make a postal or an in-person application. Both clients and their representatives are capable of understanding that past performance is not always a clear indication of future performance and that there are always exceptions. Disclaimers to this effect can also be given. We consider that publishing processing times has worked well for the international group and that it could usefully be copied.

## **2. Which of the following information do you require:**

- UKBA performance against the current service standard;
- Updates to your application if Service Standards are missed;
- Estimated timeframe for deciding your application.
- What you can do if we fail to meet our published service standards
- Other – please state

We can only tick one box above. Our response is all of the above, but also the ability to get touch with a person by email before a service standard is missed to learn if service standards are on track to be met in cases of urgency.

### 3. How would you like to receive this information?

- Website
- Email updates
- Customer Contact Centre/IEB
- What else would you like to see published?

The boxes above do not allow us to tick more than one box. We should like to receive the information through the website and by email updates.

As to what we should like to see published, please see the answers to above. We should like to emphasise how useful it is to see information on how long applications are taking, processing times as is done for entry to clearance. This does not make a commitment but gives an indication that is incredibly helpful in managing clients' expectations and which clients can use to decide whether they had rather make a postal or an in-person application. Both clients and their representatives are capable of understanding that past performance is not always a clear indication of future performance and that there are always exceptions. Disclaimers to this effect can also be given. We consider that publishing processing times has worked well for the international group and that it could usefully be copied.

### 4. Is there is anything else you would like to share in relation to:

- Handling of applications;
- Accessibility of information;
- Customer service;

Yes. We refer you to the following ILPA letters, which are appended hereto. The letter to Ms Dower of has been anonymised to remove individual case references.

ILPA to Mr Whiteman, Chief Executive of the UK Border Agency re invalidity of 6 June 2012 (awaiting response)

ILPA and the Law Society to Mr Hughes and Ms Castle of 24 July 2012

ILPA to Ms Dower, Operational Policy and Rules, re UK Border Agency getting in touch with clients directly of 10 August 2012 (anonymised text). This letter is significant not only because of the specific point it makes about the treatment of legal representatives, but for what the examples contained within it illustrate about the way in which customers are treated.

ILPA to Mr Oppenheim of 7 September 2012

Thank you for taking the time to complete this questionnaire.

Details of respondent:

Sophie Barrett-Brown

Chair

ILPA

13 September 2012, on the UK Border Agency's standard form.