



Home Office

The Home Office response to the Independent Chief Inspector's report:

A re-inspection of the handling of Tier 4 sponsor licence compliance.

July 2016

The Home Office thanks the Independent Chief Inspector for his report.

UK Visas and Immigration (UKVI) plays a vital role in driving and implementing change to support the wider Home Office purpose and principles. We are pleased that the Independent Chief inspector's re-inspection finds that changes made since the original inspection report have led to improvements in the monitoring of Tier 4 sponsor compliance and that progress has been made against all five original recommendations.

We are pleased that the Independent Chief Inspector recognised the time and work that has been invested in conducting a full review of the sponsor compliance network and acknowledged that further improvements would be realised as this process concluded.

We are grateful to the Independent Chief Inspector for highlighting potential areas for further improvement on the work already completed, including the recommendation of clearer guidance for officers surrounding compliance reports. We agree with this point and have taken steps to include further guidance as part of the ongoing review.

The Home Office previously accepted all five of the Chief Inspector's recommendations in full following the initial inspection and are pleased that following the re-inspection there are no additional recommendations made.

1. Recommendation 1:

Ceases the practice of ‘reporting by exception’ and sets out within compliance reports how the sponsor has demonstrated compliance where a ‘Met’ marking is given.

1.1. Response

We accept the Independent Chief Inspector’s view following the re-inspection that ‘reporting by exception’ within compliance reports has ceased as recommended.

2. Recommendation 2:

Introduces a requirement for compliance officers to record standard details within their compliance reports such as:

- **a summary of the checks and interviews conducted;**
- **clear findings, including whether any inadequacies identified amount to non-compliance with sponsor duties.**

2.1. Response

We accept the Independent Chief Inspector’s view following the re-inspection that the level of detail recorded has improved and that report stencils are more comprehensive. The re-inspection noted that some additional clarity and guidance for officers to ensure all reports are fully in line with published guidance would be beneficial and we will put this in place.

3. Recommendation 3:

Improves its quality assurance mechanisms by ensuring that:

- **an objective for managers to observe a certain number of compliance visits per compliance officer is consistently applied and achieved;**
- **all compliance reports are countersigned by an HEO or above, regardless of recommendation; and**
- **full quality assurance checks are undertaken on a random sample of reports and written feedback is provided to the lead compliance officer.**

3.1. Response

We accept the Independent Chief Inspector’s view following the re-inspection that management assurance of compliance reports has improved and that UKVI has taken steps to improve the quality of visits by setting managers quality targets. The re-inspection team identified that there was still some confusion regarding the required frequency of management observations of visits, which UKVI needs to clarify for managers and compliance officers. This will now be put in place.

4. Recommendation 4:

Stores compliance visit notes electronically in a central location.

4.1. Response

We accept the Independent Chief Inspector's view following the re-inspection that some improvements had been made but that UKVI had not yet fully addressed this recommendation. As part of the ongoing compliance network review UKVI is working towards a web-based solution to storing compliance reports and other documents and this will be introduced before the end of 2016.

5. Recommendation 5:

Differentiates the roles of HEO and EO compliance officers to reflect the grade distinction.

5.1. Response

We accept the Independent Chief Inspector's view following the re-inspection that this process is well underway and will be completed as the compliance network review concludes in October 2016. We are pleased that the Inspectorate has noted that this process has been handled carefully and with due regard for retaining the experience and knowledge of compliance network staff.