



Overview report on my visit to Athens and to the European regional conference: April 2007

1 European conference

The Director of Visa Services Europe and both Deputy Directors Visa Services hosted a series of conferences and invited me to address each of the groups - 6 in all - over a 10 day period. I thought that these complicated overlapping conference arrangements were well managed, with separate programmes for Entry Clearance Managers, Entry Clearance Officers and Entry Clearance Assistants. The conferences combined updates on UKvisas' busy business change programmes with training workshops giving delegates practical experience.

In an earlier report I recommended that Directors of Visa Services consider targeted training aimed at singleton Entry Clearance Officers and multi-tasking Entry Clearance Managers. The European region is, with a few exceptions, composed of such Posts whose needs can be overlooked when much of the focus is on visa sections handling hundreds or thousands of applications each day. This conference was an excellent way of providing the support and refreshment training that is needed and I understand that delegate feedback has been very positive. From my own perspective, there are now 30 Entry Clearance Managers, more than 30 Entry Clearance Officers and 40 or so Entry Clearance Assistants who have a better understanding of my role, and who might return to their Posts and look at the application process from the applicant's point of view. It was, I thought, a good use of my time and I am grateful to the European management team for the invitation.

2 Visit to the British Embassy visa section in Athens

Background information

UKvisas provided a helpful advance pack of briefing information, including a Post Report.

- Demand has fluctuated significantly. In the financial year 2005-06, Athens received 2,163 UK applications, an increase of 46.4% on the previous financial year and so far this year, (April 2006 - February 2007), there is a comparative decrease of 22.2% Visa staff think that the rise last year was caused by an amnesty for illegal migrants, who were then able to secure valid travel documents.
- 51% of applications are for non-family visits, and 5% for short and long term students.
- The refusal rate for all applications has fallen a little from 23.2% in 2005-06 to 19.2% this year.
- The Post has been without an Entry Clearance Manager/Consul since September 2006, though there has been some back up cover. The time allocation for visa work is normally 22%.
- Two locally engaged Entry Clearance Officers job share providing the equivalent of 55% of a full time post, supplemented by back up cover of 15%.
- During my visit information emerged to suggest that UKvisas may have been charged for more support staff than are currently allocated to visa work. In 2005-06, the most recent figure available, Athens showed a deficit of £192,252 for visa work

The Independent Monitor for Entry Clearance

The programme

On arrival I issued instructions for the file samples I wished to assess and they were provided efficiently. I talked with Entry Clearance Assistants and Entry Clearance Officers about their roles and work. I reviewed the information available to applicants on the FCO Athens website and at the Embassy. I met the Airline Liaison Officer who briefed me on her work and I was pleased to hear that decisions made by visa staff do not cause her concern. I visited the Canadian Embassy for a useful meeting with the Consul to learn of their experiences since visa business was transferred to Rome 10 years ago. I had three meetings with the Ambassador and record my appreciation for his time, and his interest in visa matters.

Application process

Since February 2007, all applications must be made on-line and an appointment can be booked on line. The applicant attends the Embassy to hand in the printed and signed VAF and passport, pay the fee, and provide biometric fingerprint data. Decisions are normally made the same day. If the Entry Clearance Officer decides that an interview is needed, (the percentage was unknown), that is generally fitted in on the same day to avoid the need for a further journey by the applicant.

First impressions

The Embassy is well maintained, modern and bright. There is, however, no street sign to indicate which is the entrance - I walked round the corner to search and then asked a policeman! A public entrance to an official building needs to be marked as such and **I recommended** that there should be an Entrance sign, easily readable from the street.

[UKvisas' comment: Post does not agree with this recommendation on grounds of security.]

Reception staff are instructed not to allow anyone in who has not made an on-line appointment, but I was concerned that those who do not are handed a strip of torn off paper with on-line application information. I noted that the Canadians use smart looking business cards for people who turn up on the doorstep and **recommended** that the British Embassy does the same, using the UKvisas logo.

[UKvisas's comment: Post agree with this recommendation, and will look into how they can improve the way they tell callers about the on-line appointment service, for instance using compliment slips with the UKvisas logo, rather than expensive business cards.]

Information for applicants

Using a range of internet search engines, both in Greece and the UK, it was reasonably easy to get to information about visas. The Embassy **website** home page has a link to Visa4UK, but on the days I looked at it, the reader had to scroll down the page to find it and research shows that most website users do not bother to do that. It would be more helpful if the link could be added to the list of links on the left hand side of the Embassy home page. I note that it is not easy to get from the Visa4UK site to information on supporting documents; the FAQ refers the reader back to contacting the visa issuing office directly but does not explain that the reader has to go to a Services button and from that to Visas.

The Independent Monitor for Entry Clearance

I did note that the information provided on the Athens local site is far better than most and that support staff have put time and attention into updating it. I remain of the view that most information should be provided centrally from the UK and that only very local information, such as the application process and opening times, should be generated locally.

As I have done on all of my visits, **I recommended** that visa staff should assess each noticeboard point - at the entrance, in the lift, in the waiting room - to see what information the applicant needed at that point.

[UKvisas' comment: Post agree with this recommendation. As part of their objectives, the Entry Clearance Assistants will regularly undertake a review of the notice boards.]

Whilst information was generally available, I could not see why the notice about the on-line system had been printed in Spanish red and gold, rather than using UKvisas' British red white and blue logo. **I recommended** that information should be updated, and all of it should be printed using the UKvisas logo to make it easier for applicants to see which notices related to visas.

[UKvisas' comment: Post agree with this recommendation. This will also form part of the Entry Clearance Assistants' objectives.]

The waiting room is small, though as pleasant as possible with TV, water and newspapers. I was puzzled why the English language paper was the Herald Tribune rather than a UK newspaper. I thought that the small selection of UKvisas information leaflets were appropriate and well presented.

At the counter

I noted a good balance between helpfulness and firmness when applications were accepted. I did note that staff made notes on the paper Visa Application Form when UKvisas Best Practice says that notes should be recorded on the IT system so that they are easily accessible. **I recommended** that Athens follows that guidance. I did note good sponsor and employer checks with the evidence clearly set out in the Refusal Notice.

[UKvisas' comment: Post agree with this recommendation. The Entry Clearance Manager will ensure that this guidance is being followed as part of a wider review of working practices in the Visa Section.]

File sample

I reviewed 51 files where visas had been refused and although all were intended to be cases with limited appeal rights, 4 (8%) had been given incorrect appeal information. All of the Refusal Notices stated the category of the application and stated the time period, for example a "visit for 2 months". Given my global sample concerns that business visits are not being recorded, I noted that they are in Athens. Refusal Notices were to the point, well presented and consistent in style and structure. Decisions overall were generally reasonable though some Notices tended toward statements of facts, without adding the relevance of the fact to a specific Immigration Rule, or expanding a fact into a reason.

The Independent Monitor for Entry Clearance

I recommended that support staff should be undertaking verification and document checks and recording their findings on an appropriate form so that it is clear that the Entry Clearance Officer determines what weight to place on this additional information.

[UKvisas' comment: Post agree with this recommendation. The joint heads of the Visa Team will clarify with the Entry Clearance Assistants what their correct role in the process should be. The Entry Clearance Manager will have overall sight of this process as part of the review of working practices.]

General correspondence

I examined the file of general correspondence and found mostly courteous and helpful replies, though a few did not respond to the specific question asked. I was concerned that one provided wrong information about the Immigration Rules, telling an applicant that studying is not allowed on a visit visa. I noted that a fair amount of time had been taken checking whether an enquirer needed a visa, including asking Entry Clearance Officer Support in London, when the simpler, quicker and most accurate response would have been to direct the enquirer to UKvisas website.

I was concerned that 37% of the emails constituted service complaints but were not being recorded as such. Most were about the waiting time for an appointment, typically 2 weeks, and many related to applicants not being able to lodge an application in time to travel over Easter. In some cases, the Entry Clearance Officers agreed to fit an applicant in, but others were told that was not possible. **I recommend** that in the interests of fairness and transparency a record should be kept of those who are allowed to jump the queue, and that should be analysed at intervals. I also note that the existence of an application lodging queue does make the PSA targets - which Athens meets - meaningless for applicants.

[UKvisas' comment: Post have confirmed that they will, in future, keep a record of complaint emails from applicants who are unhappy with the length of waiting times. They will also state current average waiting times on its website and will keep a formal record of urgent applications.]

Where the response to a complaint was that the application could not be lodged in time for a planned Easter visit, I thought it inappropriate for the reply to wish the applicant a "Happy Easter". I also explained that when providing information about appeal rights visa staff should not say "Unfortunately there is no right of appeal" - not only are there limited appeal rights, but saying that the limits are "unfortunate" suggests that the writer disagrees with UK law.

Entry Clearance Manager responsibilities

Although there has been some back up cover, Athens has been without adequate Entry Clearance Manager input for some time. Although the Entry Clearance Officers will have missed normal support and supervision, the gap was also apparent in the lack of updated registers for specific categories of work. I noted specific concern that Facilitations are not being recorded adequately. The Ambassador circulated the required reminder last year, but there is a misunderstanding of what amounts to facilitation. Facilitation is a "fast track" for visa applications, used when requests are made to take applications out of turn or, in exceptional medical/compassionate cases only, process them out of normal public opening hours. There is nothing intrinsically wrong in facilitations of that nature, but there is a requirement to record them. I understand that a typical application will be to fast track visas for domestic staff

The Independent Monitor for Entry Clearance

employed by diplomats and, as the application lodging time is around 2 weeks, such requests are about speed rather than an attempt to influence the decision. **I recommended** that facilitations are properly handled and recorded in accordance with UKvisas Best Practice.

[UKvisas' comment: Post confirm that the newly arrived Entry Clearance Manager is addressing this issue and will ensure that all facilitations are recorded as such. After the Monitor's visit, the Ambassador re-issued guidance to all staff on the facilitation process.]

Resources

As part of a wider review, UKvisas and the Embassy should confirm the actual level of resource needed and provided. **I also recommend** that a very careful eye is kept on waiting times for appointments and that queues are noticed and then managed out.

[UKvisas' comment: Post is in discussions with their Director of Visa Services over solutions to resource problems. UKvisas is also developing a staff resource and forecasting model that will allow it to identify busy periods and use demand volume forecasts to predict numbers of staff required for the future. Meanwhile Post will look at ways of managing customer expectations in relation to waiting time for appointments, by publishing current times on its website.]

Overview

I saw Athens at a time of significant disruption. A newly appointed Entry Clearance Manager had arrived a few days earlier and was about to head back to the UK to undertake the Entry Clearance Manager training course. The consular section was being assessed by senior UK based staff. Whilst the timing of my visit may not have been the most convenient, it did show the Post in a real life situation, and that in itself was helpful. I commend the visa staff for their willingness to contribute to my visit, and to be open minded to change.

Given the significant gap in recent Entry Clearance Manager oversight, I have to class that element as **Poor**. I am confident that will quickly improve so long as adequate time and attention is paid to visa work in a Post that has a heavy consular demand. I thought that Entry Clearance Officer work was of **Good** quality, scoring 93% in my assessment of 12 key quality pointers for Refusal Notices, with an easy capability to lift that to very good or excellent. **I recommend** that all visa staff should contribute to a fresh look at making best use of roles and resources.

[UKvisas' comment: The new Entry Clearance Manager is looking carefully at staffing levels, working practices and training needs in the Visa Team. Post recognise that there have been management issues within the Consular Section, and they are now making good progress in this area.]

L M Costelloe Baker
Independent Monitor