



**THE UK BORDER AGENCY RESPONSE TO
THE INDEPENDENT CHIEF INSPECTOR'S
ABUJA REPORT**

The UK Border Agency response to recommendations from the Independent Chief Inspector's Abuja Report.

1. Reviews the daily targets for consideration of applications: The UK Border Agency accepts this recommendation.

- 1.1 The Entry Clearance officer (ECO) daily benchmarks in Abuja are
 - 32 visit applications or,
 - 60 fast track applications or,
 - 22 points based student applications or,
 - 20 points based applications; other than students
- 1.2 ECO productivity benchmarks are set at a level which seeks to strike a balance between the need to meet customer service standards, carry out adequate checks to ensure decision quality and the availability of resources. Customer service standards are designed so that ECOs may take longer to process non-straightforward cases that require additional checks.
- 1.3 The time that an ECO spends considering a case is one part of the decision making process. At the visa application centre, the UK Border Agency's commercial partner's staff will check that an applicant has submitted the correct documents with their application, given biometrics and paid the fee. An entry clearance assistant will collate the results of the immigration and criminal data base checks and verify documents. An entry clearance officer should have in front of him/her all the information s/he needs to make a decision. The ECO may still, having received the case, request that (further) verification checks are completed. The productivity targets allow for this.
- 1.4 Benchmarks are applied flexibly to allow ECOs to do tasks other than assessing visa applications, such as writing appeal statements, dealing with correspondence, and receiving and delivering training and to take account of variables such as IT outages - thus on any given day some ECOs will exceed their benchmarks, while others may not reach them. Over a longer operational period, benchmarks nevertheless provide a means of ensuring fair allocation of work and of reinforcing the expectation that each team member will make a reasonable contribution.
- 1.5 Managers at Posts also review benchmarks on a regular basis and will differentiate between categories or groups of applications. The criteria used to decide benchmarks are demand, number of ECOs available for assessing duty and ability to maintain decision quality and assurance standards. So, for instance, benchmarks will be lower for complex cases such as settlement. Benchmarks in Abuja were reviewed in August. The next comprehensive review will be carried out by a working group in mid-October. All ECOs will be consulted as part of this review.
- 1.6 Application volumes have fallen in West Africa in the last two years. In this context, the UK Border Agency believes the benchmarks agreed for Abuja ECOs are reasonable and achievable. Abuja will look to its internal management controls, particularly ECM review of decision making, and seek to improve performance with its existing resources.

2. Uses the Entry Clearance Manager Review Guidance Tools to quality assure issues and refusals of entry clearance: The UK Border Agency accepts this recommendation.

- 2.1 At present Entry Clearance Managers (ECMs) are required to review a sample of ECO decisions. The current targets for ECM review of cases were developed as a result of a recommendation by the former Independent Monitor that the UK Border Agency cease reviewing 100% of refusals and instead conduct targeted in depth reviews of a smaller sample of cases. In Abuja, ECMs review on average 35% of refused applications (10% above the minimum required level) as well as 10% of issues. These levels of review led to a 2% overturn rate. In addition ECM reviews are also used as a targeted quality assurance tool. In Abuja, new ECOs have all of their decisions reviewed by ECMs for at least their first two months in post. Decisions in new categories of application also receive closer scrutiny to ensure consistency during the bedding-in period. For instance, Abuja ECMs currently review 100% of decisions under Tier 4 of the Points Based System. Complex categories, such as those that are refused under paragraph 320 (7), are also subject to 100% ECM review.
- 2.2 The 'Entry Clearance Manager Guidance Tools' is the file sampling methodology used by the ICI team in this and previous reports. The UK Border Agency is seeking to improve the overall quality of refusal notices by introducing the ICI team's methodology as part of its own Entry Clearance Manager (ECM) decision review process. It has not yet been rolled out to all Posts and the tools were not available to Abuja at the time of the inspection. The UK Border Agency aim to have the tools in place by the end of March 2010, after including them in the ECM training course.
- 2.3 The UK Border Agency will conduct a further file sample of Abuja cases using the same methodology as the ICI team in six months time to monitor Post's progress in improving the presentation of evidence in refusal notices. The UK Border Agency will share these results with the Independent Chief Inspector.

3. Monitors refusal rates and provides more feedback to Entry Clearance Officers to improve consistency of decision making: The UK Border Agency accepts this recommendation.

- 3.1 The UK Border Agency regrets that differences in individual ECO refusal rates had not been identified earlier. All Posts will now be instructed to carry out monthly checks of refusal rates.
- 3.2 Abuja is now carrying out regular reviews of issue/refusal rates. ECO statistics are reviewed at the end of each day by the responsible ECM and compared against the average for the category of application allocated to that particular ECO. Issue/refusal rates across all teams will then be recorded daily, enabling all ECMs to review their comparative issue/refusal rates against particular types of applications.
- 3.3 ECMs in Abuja have introduced more effective feedback mechanisms for individual ECOs, their ECO teams and the section as a whole. Regular meetings are now held between ECMs and ECOs specifically to discuss decision quality. These mechanisms will ensure that individual development needs are met; that ECOs have more opportunity to proactively contribute to refusal structure and wordings; that trends in certain categories are identified early and remedial action taken quickly; and that best practice is shared across the whole section.
- 3.4 There are legitimate reasons for variations in ECO refusal rates. Issue/refusal rates will necessarily vary according to how work is streamed within a visa operation. All large

Posts, including Abuja, stream their work according to category or risk profile in order to facilitate the flow of work and allow ECOs to build expertise in certain areas. Groups presenting a lesser risk, such as those with multiple evidence of previous travel and compliance, will attract a lower refusal rate. ECOs are often tasked with assessing only low risk groups for up to a month at a time. By contrast, ECOs may also be tasked with assessing higher risk applications for prolonged periods. For example, in Abuja a number of ECOs were tasked with processing student applications which historically have attracted a high rate of refusal. It is however accepted that rates were not specifically monitored to confirm these expected trends.

- 3.5 The UK Border Agency will monitor individual ECO refusal rates centrally through returns to its quarterly checklist exercise, starting with the next return covering October – December 2009. The exercise covers all posts with visa issuing capacity. Regional managers have been tasked with ensuring that mechanisms are in place to monitor ECO refusal rates. Any significant discrepancies between individual ECO refusal rates at each Post will be investigated.

4. Allows no local exceptions in how staff record case category. This will ensure customer service targets are accurate: The UK Border Agency accepts this recommendation.

- 4.1 The UK Border Agency does not allow Posts to depart from the definitions for recording case categories against customer service standards. Abuja is now following standard practice. The UK Border Agency will issue guidance to all Posts by the end of October to reinforce the instruction that no local exceptions may be made to the definitions and to clarify the definitions of categories.
- 4.2 As the Report notes, customer service targets for UK visa processing times are linked to the recording of a case according to whether it is straightforward or non straightforward:
- 90% of straightforward, non-settlement applications should be considered in not more than a week, 98% in not more than 2 weeks, and 100% in not more than 12 weeks.
 - 90% of non-straightforward, non-settlement applications should be considered in not more than 3 weeks, 98% in not more than 6 weeks and 100% in not more than 12 weeks; and
 - 95% of applications for settlement visas should be considered in not more than 12 weeks and 100% in not more than 24 weeks.
- 4.3 The UK Border Agency publishes a breakdown of performance against these targets by each Post [on its website](#). The UK Border Agency publish both our performance not only against this standard but also how many visas by application category were refused within 2, 3, 5, 10 etc days. This gives applicants a clear idea of the average time they can be expected to wait.
- 4.4 A straightforward application is one that can be decided on the basis of the application and the supporting documents submitted without the need for further enquiries or more detailed scrutiny. A non-straightforward application requires more time to be decided, for example if more detailed enquiries or a personal interview is needed. A week is defined as 5 working days. The numbers of straightforward and non-straightforward cases are recorded on the website.

5. Reviews and clarifies information on provision of supporting documentation so customers are aware of what they need to provide: The UK Border Agency accepts this recommendation.

- 5.1 There are no prescriptive documentary requirements for visa applications other than those under the Points Based System. The onus is on the applicant to satisfy the ECO that they meet the requirements of the immigration rules. The UK Border Agency provides general advice on the kind of documents that are likely to satisfy the ECO that an applicant qualifies a visa. However, the UK Border Agency accepts that this can lead to confusion and will review whether to prescribe supporting documents for non-PBS routes. The UK Border Agency expects to complete this work by March 2010.
- 5.2 In the meantime, information for applicants on supporting documentation is available through checklists published on the UK Border Agency's visa services website. The checklists are regularly reviewed and contain 'universal' requirements. Post-specific information is provided locally. The UK Border Agency aims to clarify the universal/local requirements by the end of the year. Visa application centre staff will inform an applicant that if they do not include the documents listed in the checklist, the applicant may fall to be refused.

6. Introduces a quality assurance process for correspondence handling: The UK Border Agency accepts this recommendation.

- 6.1 The UK Border Agency is committed in its Customer Charter to providing a high standard of service to customers, including giving detailed replies to enquiries and correspondence. The Agency recognises that proper handling of feedback will enable it to make improvements to its business and should lead to a reduction in correspondence. The Agency is implementing measures in its visa business to capture and use feedback more effectively and raise the quality of correspondence, including more thorough and consistent analysis of complaints and customer satisfaction surveys.
- 6.2 Abuja has a dedicated correspondence team, staffed by two full time Entry Clearance Assistants. The Post has specific plans in place to develop its correspondence handling in preparation for taking on significant additional work from Lagos. This will continue to be an exclusive area of work and the team will now be expanded, primarily with more oversight from a dedicated ECO and ECM who will quality assure responses produced by the unit. This will involve 100% checks in the initial stages by an ECO, with the appropriate percentage of ongoing checks to be agreed once the unit is established. ECMs in turn will quality assure all templates and a smaller percentage of responses to correspondence. Where an ECM produces a response, either to a complaint or high level correspondence, a percentage of those will be subject to peer review by an ECM colleague. Abuja are conducting a full review of the standard replies currently in use, updating them where appropriate to improve the overall quality.
- 6.3 The UK Border Agency will issue guidance to all its overseas Posts on the quality assurance of correspondence by the end of November.

7. Improves the design of its websites so that visa customers can find relevant information easily: UK Border Agency accepts this recommendation

7.1 The UK Border Agency has an ongoing programme of improvement to the navigability and content of our website. The UK Border Agency has already made a number of changes since the Independent Chief Inspector's visit to Abuja. These include:

- Section homepages: new introductory paragraphs make it clear what information can be found on the pages underneath. This work was completed by 10 July.
- Home page: a simple structure was relaunched on 17 July following a full review of the way information was presented. The mix of 'latest news' content style and unnecessary links have been removed; the 'Do I need a visa' functionality has been incorporated into its own content section; and the most popular or new content areas of the website have been highlighted as feature links.
- Guide to visa processing times: new interactive functionality was implemented on 3 August. This allows users to see recent visa application end to end processing performance by selecting a visa application centre from a drop-down list. The UK Border Agency believes this is one of the most comprehensive and transparent guides to processing times of any major global visa service. The UK Border Agency will also introduce a guide to biometric appointment waiting times.
- Student application information: a new page for students (titled 'Are you looking to study in the UK?') was published on 6 August, clearly signposted from the home page.
- Nigeria website: all pages of www.ukvac-ng.com were extensively rewritten to improve content and information flow, with the work completed by 18 September 2009.
- Online applications: Content describing the online application process, currently available on the Visa4UK website, has been integrated with the Visa Services website. By the end of October 2009, Visa4UK will cease to exist as a separate website but will retain the online application functionality (interactive online forms). The guidance related to making online applications will be integrated and maintained as content on the Visa Services website.
- Visa application forms: all visa application forms can now be downloaded from the visa services website.

7.2 Future developments:

- Online applications: short 'click on' guidance help to assist visa applicants complete the online visa application forms. This functionality is part of the online visa application system, has been tested and will be deployed for all the online visa application forms by the end of October 2009.
- Step by step guide to making a visa application: the Agency has begun a major review of the content related to information for visa applicants abroad. This is based on extensive customer feedback, will include PBS changes and will significantly improve the customer journey. The UK Border Agency are working with stakeholders, users and Agency staff in the UK and abroad to present the information in simple step by step guides to making a visa application. Target date for completion is mid 2010.
- Commercial partner websites: the UK Border Agency will work to eliminate duplication of information with the Visa Services Website so that Commercial Partner websites focus on local information and branding.

Other points raised in the report

The UK Border Agency offers the following comments on other observations made in the report for further clarification.

6. Inspection findings

In paragraph 6.1 it is noted that “Data accuracy was poor, with 29 files of the 100 sampled being recorded inaccurately on the case management system used by the UK Border Agency”

The ICI’s remit for the file sample was restricted to refused cases that attract limited appeal rights. These cases include non-family visits, certain student applications (including those seeking entry for less than 6 months), PBS applications (but not all PBS dependant applications).

The data accuracy problems relate to the application information on our case handling system (Proviso). This defaults to standard visa durations for all applications, which for most is 6 months.

- 22 of the 29 cases relate to student (or student dependant) applications, where the ECO had failed to change the default setting prior to refusing the application from 6 months to the period requested by the applicant (for instance 2 years). All student applications of more than six months attract the right of appeal and so would not have fallen within the ICI’s remit. All 22 of these applicants had been given the correct appeal rights.
- 1 case related to a ‘family visitor’ (which if refused attracts the full right of appeal) that had been erroneously entered as a ‘general visitor’. The applicant in this instance had been given the correct appeal rights.
- 2 cases related to PBS dependants. Both of these applications attracted the full right of appeal when refused. The ECO had given the correct appeal rights, but had not noted this on Proviso.
- The remaining 4 cases were a mixture of ‘other’ visit types all of which should have been recorded as having a right of appeal. The ECO had given the correct appeal rights, but had not noted this on Proviso.

Abuja will take action to ensure that all ECOs ensure they record rights of appeal correctly as well as lengths of stay. A check will be incorporated into ECM review and the data accuracy will feature in local training sessions to prevent recurrence.

In paragraphs 6.3 and 6.4 it is noted that “The remaining five cases (8% of the sample) included a range of applications as business visitors or students who wished to study for under six months. Each case had been considered under paragraph 41 as visitors, instead of under paragraph 56 as students or paragraph 46G as business visitors. We discussed this with the Entry Clearance Manager who said that Entry Clearance Officers had brought this to his attention before”

Applications in these categories must be considered first under paragraph 41 and subsequently under relevant paragraphs for different visitor types. If an application in these categories fails to meet the general requirements of paragraph 41, it falls to be refused on those grounds. The UK Border Agency accepts that, where cases in the categories are refused, reference should also always be made to whether the applicant met the requirements of the paragraphs specific to the visitor type.

The UK Border Agency accepts the ICI's team's findings in respect of the five cases mentioned. Abuja has issued revised refusal notices to each of these applicants.

In paragraph 6.4 it is noted that “He (the ECM) considered that the speed codes may require some revision to alleviate this problem. We agreed and consider the UK Border Agency should review the speed codes for Abuja and update as necessary”

Speed codes are shortcuts introduced by some Posts to speed up the way that Entry Clearance Officers create refusal notices. They are Post-specific, and the text is agreed by the local visa team. They utilise the auto correct function of Word. For example, an ECO could type “visbiz”, and a paragraph of text would appear – ‘You have sought entry to the UK as a business visitor, but I am not satisfied that you intend to carry out a “Permissible Activity”’.

A review of regional speed codes is currently underway. The review is being led by an ECM with recent experience as a Presenting Officer who therefore brings a good knowledge of how entry clearance cases are considered at appeal hearings.

The UK Border Agency has set detailed terms of reference for the review to ensure it examines clarity (including use of plain English) and balance. The review team will produce new speed codes to be used as templates across the region.

In paragraph 6.6 it is noted that there were “12 cases (19% of the sample) where the Entry Clearance Officer had not taken into account all of the evidence”

The UK Border Agency accepts that there were deficiencies in the way that the evidence in these cases was presented in the refusal notices. The UK Border Agency has reviewed all 12 applications and upholds the decision to refuse in 9. Of the 9, revised refusal notices have been sent to three applicants, two of which have been refused under paragraph 320 of the immigration rules in addition to the original grounds, as documents supplied have subsequently been found not to be genuine. In the three cases where the UK Border Agency have changed the decision, the UK Border Agency has now issued visas to two of the applicants and the other has been invited to contact Post with a view to reconsidering the application after further documents were received from the sponsor.

Paragraphs 6.6 - 6.8 give details on three cases where documents on which the decision had been taken had not been copied. The report notes that “in the event of a customer complaint, or an Administrative Review for a points-based application, this would have made it difficult, if not impossible, for the Entry Clearance Manager to conduct a balanced review.” It is also reported that “During an interview with the Entry Clearance Manager, he confirmed that the practice of photocopying all documents was inconsistent. We recommend that the guidance for customers be revised to request originals and photocopies of all documents submitted in support of any application”

It is not standard policy to photocopy all documents and Abuja were meeting standard requirements in this area. The volume and nature of applications received in Abuja means that Post is required to handle and store large quantities of paper documents. Storage space is limited and in this context, Abuja has decided to prioritise the retention of documents, in line with central requirements. If there is pressure on space, Abuja managers may instruct staff to weed certain documents. Forged documents and supporting documents required for subsequent appeal or Administrative Review consideration are always retained.

In paragraph 6.13 it is noted “For judgement to be considered defective, the refusal decision has to be perverse – a decision that no reasonably competent and fair Entry

Clearance Officer would make. We found seven cases (11% of the sample) of wholly unreasonable judgement'

Six of these cases have already been highlighted under 'correct immigration rules' or 'use of evidence'. Both Post and a central assurance team have reviewed all the decisions classified as 'wholly unreasonable'. The decision to refuse has been upheld in four of these cases. In the remaining three cases, the UK Border Agency has now issued a visa to one of the applicants. Another applicant has been invited to contact Abuja with a view to reconsider the application after further documents were received from the sponsor. In the third case the applicant has been offered a gratis application. In summary, the UK Border Agency accepts that the quality of the refusal notices highlighted in this section were not of the required standard but the UK Border Agency do not consider that the decisions to refuse were 'wholly unreasonable' in all cases. For example, one case was included in this section because a document verification report had not been attached to the case file. The ICI team therefore concluded that there was insufficient evidence to support the refusal under paragraph 320 7 (a) of the immigration rules. The applicant had submitted a forged document and evidence of the deception employed is necessary to demonstrate that refusal under this paragraph is correct. However, as the applicant had applied as part of a group, a document verification report covering all of the group's applications had been produced and was held on a linked case file. The UK Border Agency's case handling system (Proviso) indicated that the application was part of a group and signalled the user towards the case file that contained the verification report. All this information was available to the ECO who had made the original decision and there was an audit trail in place to demonstrate why the application had been refused under paragraph 320 7 (a) of the immigration rules. The UK Border Agency is satisfied that this decision to refuse was correct and reasonable.

In paragraph 6.16 it is noted that "We found 62 refusal notices (97% of the sample) contained correct information on appeal rights. This left two refusal notices (3% of the sample) where we found that incorrect information on appeal rights had been given"

The UK Border Agency accepts the ICI's team's findings in respect of these applications. The UK Border Agency has issued revised refusal notices with correct appeal rights.

In paragraph 6.17 it is noted that "We found one case of maladministration. It concerned a customer who had applied for an entry clearance to visit Northern Ireland, but was refused on the grounds that they required an Irish visa. The case was reviewed following representations by the customer's solicitors and the visa issued."

This case has already been highlighted under 'defective judgment' and the applicant has been issued with a visa. As the ICI report notes the decision to issue was taken before the ICI's visit as a result of representations received on the case.

7. Quality of Refusal notices

In paragraph 7.7 it is noted that "We judged that only 23 refusal notices (36% of the sample) were well-balanced. We found that positive evidence was either not included in the refusal notice or not given sufficient weight. We are not saying that the decisions taken were incorrect, but instead that the lack of balance detracted from the quality of decision making. This could impact on customers who, if they reapply, may be refused on another point which had not been mentioned in the original refusal notice."

The UK Border Agency accepts that there were deficiencies in the way that evidence in some of the cases highlighted in this report was presented in the refusal notice. ECOs are trained to

make reference to the full range of evidence, including that contained in previous applications, when reaching a decision on a visa application and to ensure that their decisions to refuse are fully explained to the applicant. However, ECOs make decisions on a 'balance of probabilities' and it is not always practical to make reference to all sub-paragraphs of the applicable immigration rule in every case.

8. Risk Assessment

In paragraph 8.4. it is reported that “Staff told us they would welcome more communication and information sharing with Lagos and were concerned that there was no cover for the Immigration Liaison Officer when absent for extended periods”

The Risk Assessment Units (RAUs) in Abuja and Lagos operate closely together and are line managed by the same Immigration Liaison Manager (ILM). Operational information is exchanged daily and the ILM has also initiated a new weekly summary of events to keep colleagues at both Posts informed of trends and packages of false documents encountered. The UK Border Agency has been supporting the RAU Abuja operation through temporary relief coverage however an additional permanent Immigration Liaison Officer is to join Abuja from October 09 which will enhance their overall capability. In light of concerns raised by staff over communication and information sharing the UK Border Agency has arranged a joint Lagos/Abuja RAU presentation to staff in Abuja on the work of the respective units.

9. Customer Journey

Paragraph 9.4 contains the statement “We were particularly interested in the guidance relating to supporting documentation. A common theme for refusal, from the file sampling we had carried out, was submitting photocopies rather than original documents. In five cases the customer had misunderstood the need for original documents and submitted photocopies instead”.

The UK Border Agency accepts that guidance to applicants in this area on the VFS website could confuse applicants. The UK Border Agency's policy is clear on this - ECOs need to see relevant documents in their original format, as it is harder to verify a document when only having sight of a photocopy. The visa application form clearly states that original documents are required. However, the UK Border Agency also accepts that some documents are of very high value and local circumstances may mean that applicants will not wish to relinquish control of them. Abuja will take the following steps to clarify the position:

- Revise the guidance on the website to ensure it conforms to UK Border Agency policy by end November 2009
- Ensure that the guidance contains details of specific documents that applicants may submit as copies rather than originals. The list of documents is currently being drawn up, but is likely to include the following: sponsor's passports, US 'Green' cards, identity cards, credit cards, land/property documents
- Circulate the guidance to staff in the visa section and the application centres
- Ensure notices are put up in the application centres highlighting the importance of producing original documents
- Ensure that staff working in the Visa Application Centre continue to advise applicants that originals of other documents are required when the application is submitted

10. Staff Interviews

In paragraph 10.2 it is reported that “Entry Clearance Officers told us they would welcome Post-specific induction training”

Abuja provides a four day induction course for all new ECOs. This includes a session where locally employed visa section staff share local knowledge that is relevant to the work of an ECO. The induction course also includes a two and a half hour session on document verification where ECOs are introduced to the most frequently encountered fraudulent documents in Nigeria. This session is delivered by the Abuja forgery team. Following the ICI's visit, Abuja arranged a number of "lunch and learn" sessions where locally employed staff provided UK Based colleagues with detailed information about cultural/local issues. The joint Lagos/Abuja RAU presentation will form part of induction training. The full induction course content will be reviewed over the next three months.

In paragraph 10.7 it is reported that "We found none of the staff interviewed were aware of the difference between a verification check and "other" check, as set out in the points-based guidance"

The verification rule applies to checks made on PBS specified documents only and has to be based on the fact that the ECO has reasonable cause to doubt that a specified document is genuine. For example: the ECO may compare a bank statement submitted by an applicant to a bank statement known to be genuine. Other checks are checks conducted on anything other than a specified document. If a verification check on a specified document is inconclusive or reveals that the document is not genuine then no points are awarded; if a check on a non-specified document is inconclusive the applicant is awarded points.

Training for the Points Based System was rolled out using a mixture of cascade (peer-to-peer) training and computer-based e-learning. 'PBS Champions' were selected from each region, and they attended intensive training sessions in the UK. They in turn delivered the same training to colleagues in their respective Posts / Regions. In addition, a PBS e-learning package was developed which addresses verification and checks in detail and reinforces the cascade training provided by the PBS Champions. The e-learning is accessible to all UKBA staff working overseas via the FCO intranet or CD-ROM. There is also a dedicated session on PBS on both the ECO and ECM training courses. UK Border Agency is satisfied that the training modules and e-learning package is clear on the point raised by the ICI's team. Abuja will now initiate PBS refresher training for all their ECOs.

In paragraph 10.9 is reported that "Entry Clearance Officerstold us they would like to ask the Verification Unit to do more checks, but when they did, the returned files were added to their normal allocation of 32 cases per day".

Each day an ECO will refer some of their daily allocation of cases for verification and receive files back for decision that had been referred from previous days. On average, ECOs will only deal with their benchmark allocation. There is no disincentive to refer cases for verification.

In paragraph 10.9 is reported that "They (ECOs) told us they would like to: make more phone calls to sponsors or to colleges in order to check details provided by customers; have time to check applications in more detail; take the time necessary to write properly balanced refusal notices"

There is no specific instruction given to ECOs for conducting verification checks and they are not limited to a particular number each day. Abuja allows ECOs the flexibility to conduct a range of verification checks, but it is important that ECOs know which documents it is possible to verify. The local forgery team have built up a great deal of knowledge in this area and guide ECOs as to what can and can not be verified. Abuja will soon acquire a VSC 6000 verification comparator - this machine can take high quality images of a suspect document that can then be compared with original specimens. The machine can then generate detailed reports clearly

showing discrepancies between the submitted and genuine sample documents. This technology was successfully introduced into Lagos last year and resulted in an increase in the number of forged and counterfeit documents identified. By acquiring this new technology, Abuja will be able to significantly increase the scope of their verification checks.