



Report on the handling of complaints and post decision correspondence: Islamabad December 2007

1. The Secretary of State for Foreign Affairs directed me to examine the way UKvisas handles complaints from applicants who fall within my statutory remit. UKvisas' definition of a complaint is narrower than mine so I use the term *post decision correspondence* to capture any expression of dissatisfaction with the service provided.

2. This report is a supplement to my Post report on Islamabad and provides more detailed assessment and recommendations relating to post decision correspondence. A member of UKvisas' staff working under my supervision undertook the research but the findings and recommendations are my own.

Methodology

3. We visited the Visa Application Centre run by Gerry's, UKvisas' commercial partner and examined systems at the visa section in the High Commission. We talked with staff who handle correspondence and looked at correspondence registers. We took account of relevant Balanced Scorecard ratings. We examined 437 files related to applications refused with limited appeal rights for a correspondence file sample and noted correspondence in a further 135 files assessed for the decision quality file sample.

FEEDBACK OVERSIGHT

4. One Entry Clearance Manager has responsibility for recording feedback and identifying trends in complaints; he estimated that he spends up to 10% of his time on this. Staff wrote Islamabad's complaint-handling guidance in May 2006, basing it on a policy and process used in the UK's justice system where there had been a sharp focus on improving user feedback. UKvisas' Communications team in London, praised it as "*an excellent example of where we want all posts to be...very much in line with the outline thinking here*" adding that they would be incorporating elements of it in a guide for complaint-handling to be issued to all Posts.

5. The ECM with responsibility for feedback monitoring reminds staff of complaints-handling procedures once every six months, the last reminder being in August 2007. I commend this as good practice.

ENCOURAGING FEEDBACK

6. **At the VAC - managed by Gerry's.** I was pleased to note that the visa section recognise that ensuring good service at the VAC is critical for UKvisas' reputation and operational success.

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7. The external, well used, Noticeboard at the VAC did not include a notice welcoming feedback. The manager of the VAC accepted this **recommendation** and I suspect that the omission has already been put right.

UKvisas' response:

Accepted. There is a notice at all VACs in Pakistan giving details of who to contact with complaints, comments and feedback. This was in place when the IM visited. Post will consider revising the notice to ensure it is more prominent.

8. There are two well-located feedback stations inside offering applicants the chance to make entries in a comments book or to post comments into boxes. Staff empty the boxes weekly; there are, on average, two complaints a week.

9. The VAC website welcomes feedback on its homepage and asks that comments on service be posted in the on-site feedback boxes, submitted by email (isbvacmgr@gerrys.com.pk) or sent or faxed to the Deputy Director Visa Services at High Commission. This is inconsistent with information given at the High Commission. We were told that the VAC receives very little feedback by email; the feedback boxes and logs, while not used extensively, are more popular.

10. Once a month all applicants are given feedback forms at the VAC to encourage comments. I **recommend** that UKvisas should ensure that they see a sample of these forms and confirm that appropriate follow up has been, or will be, taken.

UKvisas' response:

Accepted. [The] ECMs responsible for the commercial partnership will review a 10% sample of completed survey forms and will take the appropriate follow up action.

11. Gerry's employ a call-centre to handle telephone enquiries from applicants. The majority of callers apparently request information about waiting times and required documentation. Any complaints are recorded and passed to VAC senior managers who telephone the complainant. Just before my visit to the VAC I had suggested to the visa section Senior Management Team that there could be a simple whiteboard notice at the VAC to advertise that day's typical turnaround times, in line with recommendations in my most recent Parliamentary Report. By the time I arrived at the VAC the manager was explaining that they were about to do that! Not only is that evidence of a good working relationship between visa section and VAC but it may reduce complaints if an applicant has had sound information so that expectations are managed.

12. Verbal feedback is not invited at the VAC, but staff said that it is sometimes received, and recorded on the VAC complaints register.

13. **At the visa section:** The public waiting area has a well-marked feedback box and forms. A prominent notice in Urdu and English invites feedback and asks that letters be sent to the Head of the Visa Section though the sign does not invite applicants to use the feedback box. The box, installed when the complaints policy was set up, receives on average 3 comment forms a month. The sign offers a written acknowledgement of receipt of a complaint within five working days. Staff usually empty the box once a week, and consequently the five working

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days target mentioned in the sign is unrealistic. **I recommend** that either the sign should be changed, or the box should be emptied more regularly to allow for the published target to be met. **I also recommend** that the sign should explain how to make comments or complaints about treatment received at the VAC.

UKvisas' response to both recommendations:

Both accepted. Post will review the signage in accordance with these recommendations.

14. The form provided for applicants to complete and post states that the box is emptied daily; this may have been the case when the section carried out more interviews than it does today, and thus received more comment forms in the box. This is no longer true and **I recommend** that the form should be updated to reflect current practice.

UKvisas' response:

Accepted. The form will be updated in accordance with this recommendation.

15. On 29 November 2007 one of the Deputy Directors of Visa Services sent a detailed briefing to interested parties explaining the changes that were happening to the application process. I thought that the letter was comprehensive, using plain English to explain some complicated processes and policies. I was pleased to see that it invited feedback but the information given was not consistent with information available at the visa section, giving different titles for the point of contact - Head of Visa Section v Deputy Director Visa Services. **I recommend** that the waiting room sign should be updated if the Post now uses the term Deputy Director Visa Services.

UKvisas' response:

Accepted. The notice will be amended.

16. The High Commission website clearly invites feedback - *complaints and compliments* - on service received at the High Commission and at Visa Application Centre. There is an undertaking to reply to feedback within 20 working days. This is less helpful than the undertaking on the sign in the waiting room and the Deputy Director Visa Services' letter, both of which say that there will be an acknowledgement of receipt within five days. **I recommend** that there should be a uniform policy on acknowledgement of receipt of correspondence and all information on that should be consistent. I was very pleased to see the aim to acknowledge quickly and wish that all parts of UKvisas would follow suit.

UKvisas' response:

Accepted. UKvisas will review its policy on acknowledgement of correspondence and issue guidance within 3 months.

17. I noted that most of the email feedback we assessed reached the visa section via the High Commissioner's office or from UKvisas' public enquiry unit in London. It was largely written by solicitors or sponsors.

18. The sign in the waiting area informs applicants that if they wish to comment on their treatment by an Entry Clearance Officer during interview, they should ask at reception to speak with an Entry Clearance Manager. This is a useful service providing some welcome immediacy

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and it may prevent written or telephone complaints. I saw no written records of verbal feedback and saw no evidence of how many are requested or how they are investigated or followed-up. **I recommend** that Entry Clearance Managers should record complaints given verbally by applicants. While some might be complaints about the outcome of an interview rather than the conduct of it, if collated these verbal complaints made when the interview is fresh in the applicants' minds may provide useful management information.

UKvisas' response:

Accepted. UKvisas' current complaints handling guidance already covers this point, which has been reinforced at recent training workshops for two of UKvisas' overseas regions. All complaints, however received, should be recorded.

RECORDING, REPLYING and LEARNING

19. **At the VAC:** Senior VAC managers view all complaints and telephone all complainants who provide contact numbers. I was told that speaking directly to senior VAC staff satisfies most complainants, but on occasion they may be directed to UKvisas for further information. I commend that as good practice and it shows how careful the VAC is to manage its own reputation.

20. I was told that the managers examine complaint logs daily; VAC staff add remarks detailing follow-up action. The remarks we saw were not dated or signed and **I recommend** that follow-up action should be dated and easily attributable.

UKvisas' response:

Accepted. Post will ensure that VAC staff sign and date follow up action.

21. I did not discuss the use of mystery shopper exercises at the VAC or the call centre. **I recommend** that UKvisas confirms if they should take place, at what intervals and how they should be undertaken and recorded.

UKvisas' response:

UKvisas is currently reviewing its information services provision, including quality monitoring and will determine by June 2008 the value and role of "mystery shopping".

22. I understand that UKvisas and Gerry's staff discuss feedback regularly, although these meetings are not minuted. I think they should be and refer to my report as Independent Investigator. **I recommend** that regular feedback reporting and management meetings between UKvisas and Gerry's are minuted.

UKvisas' response:

Accepted. Post will minute weekly meetings in the future.

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23. Customer feedback has, we were told, led to improvements at the VAC; two additional bank counters were added to cater to high volumes after the building opened in September 2007, and further improvements to banking facilities are planned. I was pleased to see that VAC website sets out action taken following customer feedback. This page is linked to the visa page of the British High Commission website and I understand that it refers to feedback received through all channels at both the High Commission and the VAC. This is an extremely useful innovation; while complainants are contacted personally where possible, some applicants complain anonymously. This allows them to see the response to their feedback and indicates that both Gerry's and UKvisas are responsive, customer-focused organisations. Confirmation that feedback is taken seriously would be very re-assuring at the point where an applicant might be considering making a complaint. **I recommend** that the list of actions taken as a result of feedback is updated regularly and that copies in English and Urdu are placed at feedback stations in both the VAC and the visa section.

UKvisas' response:

Accepted. The additional bank counters were put in when the DDVS decided that banking facilities at the VAC were causing a bottle-neck, not as a result of customer feedback. Post will however ensure that actions taken as a result of feedback are highlighted at the VAC and visa section in future.

24. **At the visa section:** Following weekly emptying of the comments box, an Entry Clearance Manager divides all correspondence into complaints (feedback criticising service levels, procedures or logistical arrangements) and requests for review (criticism of a negative decision, asking for reconsideration). Entry Clearance Assistants link requests for review to appropriate files and show them to an Entry Clearance Manager. The Entry Clearance Manager with responsibility for complaint recording uses the register for complaints about the VAC and the visa section. **I recommend that** the complaint route is recorded on the register because this will confirm that the various feedback collection procedures successfully converge at the point where complaints are registered.

UKvisas' response:

Accepted. Post are now recording this.

25. The Director or one of the Deputy Directors Visa Services see all written complaints and appoint an investigating officer. The investigating officers' names and findings are recorded in the complaints register; 48% are shown as proven or justified, and lessons learned are recorded. I suspect that this is a more thorough and honest assessment than the more normal run of Not Proved that I see on most complaint registers. The complaint register does not mention whether, for example, the training needs of telephone staff have been addressed; they may well have been, but we saw no evidence of this. **I recommend** that the investigating officer takes responsibility not only for investigating complaints, but for ensuring that follow-up action is recorded in the complaints register.

UKvisas' response:

Accepted and implemented.

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26. I reviewed a sample of complaints and responses. We found that complaints with referrals from the Director of Visa Services or the High Commissioner were responded to within 3 days. Complaints sent to other staff, and to the correspondence email account, took longer although this might be explained by time taken investigating the complaint. In countries where personal influence counts I am concerned if directing a complaint to the top produces better service than using the published complaint route. It is the ordinary applicant who pays the visa application fee and they should be entitled to the same level of service as those who try to use influence.

27. I found that 30% of responses failed to meet the advertised 5 day response target. I suggest that the target should be both realistic and real. Either the visa section cannot meet it, in which case it should be lengthened, or it should be able to meet it in which case there should be managerial oversight to see where the blockages are.

FINDINGS AND OUTCOMES

28. **Post-Decision Correspondence to the visa section:** In my most recent global file sample, 4.4% of cases had evidence of post-decision correspondence. Of these, 26% (or 1.1% of the whole sample) constituted a service complaint, using my definition.

29. In Islamabad we reviewed in 437 limited right of appeal files with decisions dated one, three and six months ago and found that 18 files, 4.1%, contained post-decision correspondence. In my decision quality file sample, I found that 3.8% of the 135 files had post decision correspondence. It looks, therefore, as though Islamabad has an average level of correspondence.

30. There is a significant difference in how I and the visa section **classify correspondence**. In the decision quality file sample, I found that 80% of the correspondence contained at least one element that was a service complaint, such as failing to take evidence into account. Islamabad's assessment is more likely to class these as request for review. I noted that of the post decision correspondence files I reviewed, 15 (83%) were classed as requests for review. I shall be returning to the issue of classification when I make wider recommendations on complaint handling early next year.

31. UKvisas' speed of response target for post-decision correspondence is 20 working days. UKvisas' briefing for my visit says that *Islamabad responded to 97.20% of MP letters within the target time and was awarded a green rating. Only 79.78% of letters from the public were answered within the target time and was given a red rating.* I note that the coloured blocks on the Scorecard have these the wrong way round.

32. Only one (5%) of the files I reviewed met the 20 working day target. In 57% of the files it took more than two months to reply to post-decision correspondence. Failing to meet published targets tends to result in further complaints so **I recommend** that UKvisas takes appropriate action. I also find it unreasonable that MPs are given priority when their direct interest is more likely to be in the sponsor/constituent rather than the applicant.

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UKvisas' response:

Not accepted. UKvisas respond to over 90% of correspondence from members of the public within the UK Visas target times. The priority given to MPs is set down in Cabinet Office guidelines and is not determined by UKvisas.

33. I was concerned to find that 3 (16%) of the files did not contain responses. Two cases were from September and given the slow response times it may be that the files have not yet been allocated for replies to be written. The other non-response file is from April; this suggests that the correspondence from the applicant may have been overlooked and **I recommended** that the matter be investigated further.

UKvisas response:

Accepted. This has been investigated and action taken to respond.

34. I was also concerned to find that only one (8.3%) of the 12 responses to requests for review addressed specific points raised by the applicant. Most responses contained no detail specific to the application apart from the refusal date. I noted that an Entry Clearance Officer wrote the one letter which addressed the issues raised; the letter was specific and signed. The generic letters are produced by Entry Clearance Assistants and are unsigned, although they do make use of plain English and contain accurate applicant information. I noted careless use of templated letters, however, with multi choice sections not deleted and inaccurate information on appeal rights. **I repeat my recommendation** that responses should only be made by staff who are able to recognise through their role or through training when complaints or requests for review raise matters that may make the decision to refuse unsound or the Refusal Notice unreasonable .

UKvisas' response:

Accepted in part. UKvisas does not consider it practical, in a large visa processing post such as Islamabad, which relies significantly on LE staff, that all correspondence can be handled by personnel who have been trained to the equivalent level of an Entry Clearance Officer. But UKvisas will ensure that all staff in Islamabad who handle correspondence have had and will continue to have training as to when they should refer to a more senior officer.

35. I note that the generic letters state that an Entry Clearance Manager has reviewed the decision. In Islamabad, Entry Clearance Managers routinely review 25% of refused limited right of appeal cases, recording this on Proviso. In response to a post decision request for review, an Entry Clearance Assistant checks the Proviso record; if an Entry Clearance Manager review has already taken place, the file is not reviewed again by an Manager unless the correspondence claims that important evidence has not been taken into account. **I recommend** that to avoid being misleading, responses should state whether Entry Clearance Manager review took place at the time of decision or as a result of the post-decision correspondence.

UKvisas' response:

Accepted. ECMs will make it explicit when any review takes place.

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36. The Proviso records I saw did not show Entry Clearance Managers' reasons for upholding decisions following post-decision correspondence, nor have response letters been attached to Proviso records. **I recommend** that all post-decision correspondence should be attached to the paper file and linked to the Proviso case record.

UKvisas' response:

The ECM responsible for IT has been tasked with delivering this in conjunction with a forthcoming visit by UK Visas trainers.

37. **MPs' Correspondence:** We spoke with the Entry Clearance Assistants responsible for maintaining the MPs' correspondence register and reviewed entries for the last six months. The visa section receives around 200 items of MPs' correspondence each month. In the main these come from UKvisas' Visa Customer Service section in London, although many come directly from MPs' offices despite this practise being firmly discouraged by UKvisas headquarters. We were told that around 20% of MPs' correspondence requests expedition, but I was pleased to learn that cases are only expedited in compelling or compassionate circumstances. I reviewed a sample of full and limited appeal rights files containing correspondence from MPs and noted no discernible difference in quality or times of response by Entry Clearance Managers. I drew attention to the need to be very careful about disclosing the applicant's personal data as the Information Commissioner's 2002 exemption applies to MPs taking up constituents' cases and for refused applications it cannot apply to the visa applicant who is not a constituent.

38. **Positive feedback:** I was pleased to see a sound recognition of positive feedback and we reviewed the comprehensive bouquet file containing 120 examples. An Entry Clearance Manager enters bouquets onto a register, dating back four months. Of the sample I reviewed, 80% were addressed to the Director of Visa Services' PA who is head of the senior management team's administrative assistants. The team usually channel requests for assistance and expedition through her so she is seen as the point of contact. Bouquets are circulated to those who assisted with the positive outcome and copied to line managers as well as being recorded on a register. The register does not show who the bouquet was directed to. **I recommend** that it should as the information might help to ensure that praise is recorded in performance appraisals where appropriate as well as being noted at the time.

UKvisas' response:

Accepted and implemented.

39. The head of the Registry section confirmed that she receives positive feedback for her staff regularly; given the level of service I received from her department I am not at all surprised.. She forwards feedback to the appropriate line manager and uses positive feedback in performance appraisals of those she manages. She added that while Deputy Director Visa Services have not expressly encouraged this, it is widely practised throughout the visa section.

CONCLUSIONS

40. One of the more interesting customer service findings is that customers, in the broadest sense, think more highly of an organisation that responds well to a complaint than an

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organisation that made no mistakes in the first place. I thought that Islamabad's complaint handling systems were the most developed that I have seen and I commend them for the attention given to this often neglected area of work. I found well-established processes in place for feedback handling at both the visa section and the VAC.

41. My recommendations highlight the need to ensure that the two processes converge effectively, complaints can be investigated rapidly and, importantly, actions taken as a result can be recorded and publicised widely. Staff we spoke with are aware of the bouquet and complaints registers and appreciate their importance. Several of my more detailed recommendations can be summarised by the need for feedback information be thoroughly updated to cover current circumstances. I found that at no point in the process of replying to MPs' letters, complaints or post-decision correspondence does the visa section distinguish between cases that have full and limited appeal rights and I commend Islamabad for this fair and even handed approach. I also note with appreciation how helpful staff were in helping us to navigate processes and a significant numbers of files.

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