



Opportunities to learn: six positive immigration changes introduced during COVID-19

October 2020

Introduction

[Greater Manchester Immigration Aid Unit](#) (GMIAU) has supported people subjected to immigration control for more than 30 years. We provide free, independent legal advice, representation and support to people across the North West of England.

2020 has self-evidently presented huge challenges for people trying to navigate the immigration system, as well as for the Home Office and the courts in carrying out their functions, and for us at GMIAU supporting our clients. Our team of solicitors and OISC-accredited case workers has continued to support people throughout the pandemic. We've had to rapidly adapt our usual ways of working and re-think the norms about how things are done. However, some of the changes we've made are here to stay because our evaluation is that they provide benefit not just in times of public health emergency.

We've also analysed changes introduced by the Home Office and the courts to keep people safe during the pandemic. This report highlights six changes that our evidence shows have proved beneficial to people making applications, to us as legal representatives and to the government and judiciary in terms of efficiency, effectiveness and fairness. The changes relate to

- the way in which applications are submitted,
- the way applications are signed, and
- the way evidence is submitted.

In each case there has been a shift towards digital processes and away from unnecessary physical interactions. While not underestimating the challenges of digital inclusion, we believe there is a clear case for these measures, originally conceived as temporary, to be made permanent and in some cases expanded.

As we head towards winter, and with the Prime Minister warning lockdown measures will last a further six months, retaining these changes would continue to protect vulnerable people from the continuing threat of COVID-19. Most of Greater Manchester, for example, has remained in local lockdown since July 2020. Many of the people we support are at higher risk of contracting COVID-19 and/or having more serious health repercussions from contracting the virus: people from Black, Asian and Minority Ethnic communities, people living in precarious or overcrowded housing, people working in insecure employment situations, people unable to work or access mainstream benefits because of their immigration status, people with experience of physical trauma in countries of origin or transit. The list is long. But the changes in this report don't just protect those making immigration applications. They protect those involved in processing and making immigration decisions too. And, as it's now clear we're only as safe as our most vulnerable, they protect us all.

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Fundamentally, public health is not the only argument for these changes to be retained. Our experience shows that while the pandemic has driven change, the new processes enable more efficient, agile working within the Home Office and the courts, support legal aid being used more effectively by legal representatives, improve the environmental footprint of the immigration system and ultimately enable people to make timely, thorough and evidence-based applications.

At GMIAU we recognise the benefits these changes have brought during 2020 – the purpose of this report is to ask for them to stay.

1. Changes to how applications are submitted: fresh claims for asylum

The situation before COVID-19: Before March 2015, people usually submitted fresh claims for asylum by post. In 2015, this situation changed, and fresh claims could only be submitted in person, in Liverpool, regardless of where in the UK an applicant lived. This made fresh claims (along with initial asylum applications) anomalies within a system of immigration control that was otherwise actively encouraging online applications. At the time, the Home Office justified the move by saying it would allow

- new information to be considered swiftly and efficiently
- applications to be properly managed in good time
- casework resource to be more effectively deployed
- most cases to be considered within five working days

The vast majority of the people we support who need to make a fresh claim are destitute and living either in emergency accommodation or informally with friends. Many are entirely dependent on handouts and have very limited access to cash. Prior to the pandemic, some people were able to borrow money from friends to cover travel to Liverpool or get a lift from someone who had a car. Sometimes GMIAU would have to pay for tickets on public transport. People would often also have to find childcare while they travelled to and attended their appointment. This added considerable additional strain for no obvious decision-making purpose, given the Home Office already held relevant biometric data (from previous asylum claims) and people were merely required to hand in their papers and then leave.

It is worth stating that this created hardship for people we supported who live relatively close to Liverpool, in the wider North West region. These difficulties were greatly exacerbated for people living further afield – in places like Norwich, Plymouth, Southampton and London.

As well as difficulties of distance, it was extremely hard to secure an appointment to submit a fresh claim in Liverpool. People had to phone up to book an appointment before attending in person. It would routinely take weeks to get through as the designated telephone number was always engaged. This was particularly difficult for people with limited access to cash and phone credit. When people did get through they were often offered appointments weeks or months later. The length of delay fluctuated – we assume due to available casework resource – and while some people were offered appointments within days, our estimate for GMIAU clients was four to six weeks later, although as Joy's story shows (below) this could be longer.

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This led to particular hardship for people who were destitute and for whom submitting a fresh claim application could result in access to section 4 support and accommodation. Despite Home Office ambitions for the in-person process to result in a decision with five days, we supported many people who waited months and sometimes years. This delay was often intolerable and resulted in an extenuation of precarious, risky and potentially exploitative situations.

Change: fresh claim for asylum applications can be submitted electronically

Since March 2020, applications for fresh claims, and all supporting documents, can now be submitted by email. People are able to upload their application and documents when they are ready and receive an instant electronic confirmation of their application having been received by the Home Office.

Benefits this change brings to the applicant:

- people are not forced to undertake long and potentially risky journeys
- the inevitable delays built into the previous in-person application process are removed
- people are more swiftly able to access section 4 support where they are eligible

Benefits this change brings to legal representatives:

- reduces printing costs and helps lower the environmental impact of our work
- being able to send any additional documents the Home Office requests to a central email means less time is wasted trying to find out which Home Office team is dealing with a client's case and posting this information on to them
- legal advice resource is more efficiently used

Benefits this change brings to the Home Office:

- enables more efficient, agile working with files easily transferred to relevant caseworkers, particularly while remote working continues to be the norm. Our experience over the last six months is that for ongoing asylum cases where the file is not electronic this now requires Home Office staff to travel to an office, scan the physical file and email it to the allocated caseworker before work can be conducted. This not the case for fresh claims being submitted in electronic form to start.
- our experience is that the electronic submission of fresh claims can encourage a more communicative, responsive relationship between Home office case workers and legal representatives, resulting in the faster resolution of issues which otherwise prevent decisions being made

GMIAU asks for this change to be made permanent so that fresh claim applications continue to be accepted electronically.

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Joy's story: the challenges of making a fresh claim in person

Joy was referred to GMIAU by a community organisation that provides accommodation and support to asylum-seekers and refugees in Greater Manchester. Joy had made a previous claim for asylum in the UK, but this had been refused under the Dublin III system. Facing removal to another European country, Joy went missing for a period of time. When she was referred to GMIAU she was destitute and, with very limited English, was struggling to regularise her status. We contacted the Home Office about Joy's situation in November 2019 and she was offered an appointment in Liverpool - but not until the middle of January. This meant that Joy was required to wait for two months over winter and was unable during this time to access asylum support and accommodation. Joy's solicitor paid for her travel to Liverpool out of her own pocket. She also printed out a map and explained at length, via an interpreter, how Joy should find her way to the Home Office. As the Home Office already had Joy's file and biometric information, we believe it served no useful purpose to require her to attend in person. Critically, the long wait to submit her fresh claim left her without even the most basic of support in the depths of winter.

Farai's story: trying to make a fresh claim with no income

Farai's analysis of an asylum system which limits people's access to income, shows why making a fresh claim in person is so difficult:

"What you are going through for these years is very, very stressful. My case went on and on with a negative answer. They demanded so many things which was very hard. If you are an asylum seeker, you don't have rights, so what can you do? It's all about staying at home, they give you vouchers, and you bring some food to feed yourself. You just sit there, then go and report at the reporting centre. That is your life. I went to college and did Access levels 1 and 2, but after that you have to pay and have 5 years leave to remain, so I had to stay home. It's so stressful to stay for a long time without an answer.

GMIAU has played a very big role in my life. For any solicitor to make a fresh claim they need money. If you are not allowed to work in this country, if you are not allowed to go to university, if you are not allowed to travel, where do you think you are going to get the money? I couldn't have managed financially without GMIAU.

Now my family is together again. I have a permanent job as a mental health support worker which is ok as a job, but very challenging. We are struggling like everyone else due to the economic climate but we can't complain because it's the same for others."

2. Changes to how applications are submitted: in-country asylum claims

The situation before COVID-19: Prior to the pandemic, in-country asylum claims had to be made in person, in Croydon, regardless of where in the UK the applicant was based. Aside from fresh claims, this was the only immigration application that required in-person attendance. It resulted in people having to fund the cost of travel to Croydon - several hundred's miles away for people in the North West of England. As Michael's experience

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demonstrates (below) for many people there is no spare income for journeys across the country.

Although most people had to telephone in advance to arrange an appointment (or risk being turned away unless they were considered destitute) typically there were long queues at Croydon from early in the morning each day. We know of people turned away if they were not there very early. This posed a particular problem to people travelling from distance – for example on coaches from Manchester.

Change: people can register in-country initial asylum applications at six locations around the country

Since March 2020, adults making in-country asylum claims are still required to do so in person, but this can now be done from six locations around the UK, rather than one. For the people we support in the North West this typically requires a journey to Liverpool. It follows on from successful changes over the years to the process for children to register in-country asylum changes. It is now accepted that children can register their claims at designated local reporting centres – for the children we support in Greater Manchester that means Salford, and for those in Cheshire and Lancashire it means Liverpool.

Benefits this change brings to the applicant:

- reduces the costs of having to travel long distances
- reduces some of the risks faced by vulnerable people having to travel long distances (particularly but not exclusively during a pandemic)

Benefits this change brings to the Home Office:

- proves that the Home Office is able to manage asylum claims lodged in a range of locations. Both the experience of children's cases, and adult cases during the pandemic, create an evidence-base supporting the effective working of this more diverse geographical approach
- enables a broader geographic range of Home Office resources to be used to register asylum claims

GMIAU asks for this change to be made permanent so that people can continue to register in-country initial asylum claims around the country. Using learning from the changes applied to fresh claim applications, we would like the Home Office to explore the viability of applicants making in-country asylum claims electronically.

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Michael's story: the reality of registering an asylum claim in-country

"I didn't know how the legal system works in UK when I came here. I had no idea about claiming asylum. I had very little English and finding my way to the Home Office for the initial interview was a nightmare. They gave me a list of solicitors, but I did not know where to start. I did not have a mobile phone, I didn't have any money and even if I could phone it was difficult because I could not speak English."

Zaki's story: the difficulties making an in-country asylum claim in Croydon

Before lockdown, Zaki had to travel to London from Manchester to make his in-country asylum claim. He recalls how difficult the process was. At that time, Zaki was an undocumented migrant and therefore was not allowed to work in the UK. Travelling to London was difficult and costly. He found London difficult to navigate, especially without friends or volunteers helping to get to Croydon. He says, in an unfamiliar city *"it is easy to get lost and not arrive on time if you are on your own"*. Zaki had to wait hours for his appointment which he found very stressful, especially as he had heard stories of appointments being cancelled at the last minute. The precariousness of this situation could have been avoided if the process for making in-country asylum claims was digitised, or the locations for appointments were more widespread so that he could register his claim closer to Manchester.

Xavier's story: the benefits of being able to make an in-country claim in different locations

We currently support Xavier, a man who has been able to register his initial asylum claim in Liverpool, rather than Croydon, because of the Home Office's change in response to COVID-19. This has made a tremendous difference to him. He lives in Manchester with his brother. He has no income at all, and his brother works on the minimum wage. Instead of having to travel to Croydon, he's been able to travel to another, more convenient, location in the North West of England. Given his financial situation, funding a trip to London to lodge a claim would have been impossible, leaving him in a precarious position.

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3. Changes to how applications are submitted: applications/appeals to court

The situation before COVID-19: Before lockdown, applications to the Upper Tribunal, Court of Appeal and Administrative Court had to be posted or submitted in person. For GMIAU that usually meant applications for Judicial Review to the Upper Tribunal and to the Administrative Court went to the Civil Justice Centre in Manchester. This usually involved considerable time, expense and paper – three copies of a 600 page court bundle for example.

Change: applications to the Upper Tribunal, Court of Appeal and Administrative Court can be submitted electronically

While the Civil Justice Centre in Manchester is still accepting applications, from March 2020 applications can also be submitted electronically to an email address serviced in central London. This change has reduced the costs involved and risks for legal staff associated with travelling during a pandemic. It means that legal teams can submit documentation right up to deadlines, with life changing consequences (as Imran's story demonstrates (below)), securely and quickly, and receive proof that papers have been received in time. The change also saves reams of paper.

To date there is no facility for applications that require a physical hearing listed in Manchester to be submitted electronically in Manchester - they must all go to the central London email. We understand this is common to all regional hearing centres. While hearings are taking place remotely this is not a concern – the parties and the judge can in effect be physically based anywhere. However we can see that as and when physical hearings resume, having Manchester applications to the Upper Tribunal or Administrative Court submitted through the London email and listed for a hearing in London could be problematic. For this reason we hope a facility to lodge electronic applications directly with Manchester will be developed – for the ease of our clients and also to prevent a backlog of hearings in London.

Benefits this change brings to the applicant and their legal representative:

- removes the need for unnecessary physical journeys to lodge applications in person
- reduces costs as removes the need for couriers or secure postage
- provides automatic proof of receipt
- enables deadlines to be used in full (rather than taking into account time needed to deliver in person/by post)

Benefits this change brings to the courts:

- enables judges to more swiftly and efficiently receive applications regardless of where they are physically located
- court deadlines are not reliant on the postal service
- improves the environmental footprint of the court service

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Immigration
Law



GMIAU asks for this change to be made permanent so that applications can continue to be submitted electronically to the Upper Tribunal, Court of Appeal and Administrative Court. We also ask that this improvement is tweaked to enable applications to be submitted to regional hearing centres.

Imran's story: the advantages of lodging applications electronically at court

Imran is 17 years old and came to the UK on his own to claim asylum. His age was disbelieved following an age assessment and he was no longer entitled to support and accommodation from the local authority. Imran refused to leave his accommodation in supported lodgings – he had nowhere to go and was extremely frightened. He didn't want to leave his friends and live with adults. His supported lodgings provider did not immediately enforce his eviction and he remained in his accommodation for a further month. At that point the provider said they were going to change the locks. Our public law solicitor issued a claim for judicial review electronically challenging the age assessment and asking for interim relief (accommodation and support for Imran until a final decision on his age was made by the court). The case was issued on a Friday and on the same day a judge considered the case on the papers and ordered urgent consideration of the matter with a hearing listed to take place remotely on the Wednesday. At the hearing the judge ordered Imran be supported until the conclusion of his age assessment process. Because we were able to issue the case by email we could do so quickly and all of the papers were able to quickly and easily be sent to a judge, even though they were probably not in the court, meaning it could be looked at the same day. It meant that no-one had to undertake unnecessary journeys in the current pandemic. If we were not able to issue the judicial review and have it considered so quickly by email/online, Imran would have faced homelessness.

4. Change to how applications are signed: domestic violence

The situation before COVID-19: In 2018 we supported 83 women and their children affected by immigration control who were living in abusive or exploitative situations. We were able to advise those whose immigration status was tied to a spouse/partner visa about the destitution domestic violence (DDV) concession. Every year we support about 50-60 people to make these applications. Typically, people applying for the DDV concession are the spouses/partners of either British citizens, people with indefinite leave to remain or people with refugee status. The DDV concession gives people three months without restrictions on their access to public funds (in contrast to the spouse/partner visa where people have no recourse to public funds). The idea is that during this time people prepare an application for indefinite leave to remain (SET (DV)) which has no restrictions on people's access to employment or public funds. Having access to public funds through the DDV concession means people are able to claim benefits – including housing benefit – to fund their stay in a refuge when they receive written confirmation that their DDV application has been

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accepted. Before COVID-19, in order to apply people would normally see their legal representative at GMIAU for advice, sign the relevant forms and then we would submit the application.

Change: digital signatures and signatures of legal representatives accepted on applications for the destitution domestic violence concession

It is well known that lockdown increased the risks for people trapped in violent situations at home and exacerbated the existing additional vulnerabilities for people who are also subjected to immigration control. For example, since March 2020 GMIAU has supported over 20 people to make applications to the DDV concession, and [Safety 4 Sisters](#) has supported 31 women to access support and advice to flee situations of violence in the last six months.

Following inquiries during lockdown, the Home Office confirmed that they would accept a client's digital signature or the signature of a legal representative on a DDV concession application. Now meetings are not occurring face to face, in order to obtain a signature for the application we have (where appropriate)

- posted our clients a document with a self-addressed envelope and asked them to sign and return it to us so that we can scan the signature and digitally attach it to the application form
- asked our clients to send us a photo of their digital signature
- advised our clients and obtained their authority to sign the form on their behalf.

Benefits this change brings to the applicant:

- people are able to make timely DDV concession applications especially where they have left abusive situations without possessions, phones etc.

Benefits this change brings to the Home Office:

- signed applications are received more quickly

GMIAU asks for this change to be made permanent so that people can continue to use digital signatures/signatures of legal representatives on DDV concession applications. If the Home Office accepts this change, we would like to see if a similar approach could be taken with other types of applications.

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Jose's story: keeping safe while making a claim

Jose's immigration status in the UK was based on him being the partner of a British citizen. During lockdown his solicitor at GMIAU supported him to make a DDV concession application and then a SET (DV) application. As the advice he received from his solicitor was given remotely, he was unable to physically sign the forms himself. Instead his solicitor supported him to provide a digital signature. This prevented any delay in the application being submitted, any unnecessary journeys during lockdown and also allowed the solicitor to prepare the application in advance without Jose having to wait during a physical appointment for his signature.

5. Changes to how evidence is submitted: supporting evidence

The situation before COVID-19: while most immigration applications could be submitted online before COVID-19, original supporting documents still had to be forwarded to the Home Office within 15 days. This requirement resulted in applicants, legal representatives and the Home Office incurring considerable postage costs (for documents to be sent by recorded delivery) and problems with the postal system sometimes meant documents did not arrive within the 15 day window.

Most importantly, people we support have had their original documents lost when they are submitted as part of their immigration applications. The loss of documents has been criticised by the Home Affairs Select Committee and the Independent Chief Inspector of Borders. For example, in 2018 Yvette Cooper MP, chair of the Home Affairs Select Committee, said

"Too often we have heard about lost documents and simple errors by the Home Office that can have deeply damaging consequences for people's lives. [...] We've even recommended digitising and changing the system so people don't have to submit so many original documents in the first place, given the risk of loss and delay."

This argument has particular persuasiveness considering the need for original documents while navigating policies that create the Hostile Environment. The regulation of internal borders by members of the community, who often have limited knowledge of why people may not have access to their documents, can create serious problems. Moreover, the types of documents required to support an immigration application are very hard to replace when lost - birth certificates, marriage certificates, ID cards, passports.

As well as the impact on George (below), the Guardian has documented the experiences of people whose documents have been lost including

- [Satbir](#), whose documents were lost during an application for his wife's spouse visa: *"That was pretty horrendous. A lot of those were original documents, we had no idea how we were going to get replacements for them. Things like proof of our income, original payslips, original share certificates, original marriage certificate, birth certificates, university certificates, all of that stuff."*
- [Kate](#), from a post-Soviet territory, whose passport was lost when she tried to renew her student visa. After 2012, Hostile Environment policies meant that without her

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documents she had to drop out of university, she had no right to rent and she lived for 10 years as a cash in hand babysitter because she could not legally work.

- [Franklin](#), who for eight months was without an income and had to report every fortnight when his records were lost (he had indefinite leave to remain.)

Clearly not everyone has their documents lost, but they do have them retained throughout the application process until a decision has been made (which can take months or years). [The exception is the EU Settlement Scheme where original documents are scanned and returned very quickly.] In our experience when decisions are made, Home Office caseworkers do not often return original supporting documents with the decision letter. This is usually because the caseworker does not have physical access to the documents. So they make a decision and close the case, the documents are not returned, there is no designated contact responsible for returning the documents and weeks (sometimes months) of proactive chasing by GMIAU solicitors begins.

There are obvious echoes in these stories with the experiences of people from the Windrush generation, caught in a system where documents suddenly provided the gateway to rights and entitlements but where those documents were unavailable.

Change: electronic copies of documents can be submitted with immigration applications

Since March this year, for most immigration applications scanned copies of original supporting documents can be submitted to a specific email address. The Home Office retains the ability to request the original documents should any queries about the emailed documents arise. In addition to benefits for applicants and legal teams, this change benefits the Home Office as documents can be more easily transferred electronically to the appropriate case worker, regardless of where they are located (including working from home), it saves costs in recorded delivery expenses and there is a clear digital record of when documents have been submitted.

Benefits this brings to the applicant:

- people are able to keep their original documents to prove their identity and access rights and entitlements while their immigration decisions are outstanding
- people do not run the risk of their documents being lost or face the difficulty of trying to replace them

Benefits this brings to legal representatives:

- legal advice resource can be more efficiently used as it is no longer necessary to chase for the return of original documents
- reduces costs as it is no longer necessary to pay for documents to be sent to the Home Office by recorded delivery
- there is a digital record of supporting documents having being sent to the Home Office

Benefits this changes brings to the Home Office:

- enables more efficient, agile working with submitted documents easily transferred to relevant caseworkers, particularly while remote working continues to be the norm
- still allows caseworkers to request original documents where extra checks are required

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- reduces costs as it is no longer necessary to pay for documents to be returned to applicants by recorded delivery

GMIAU asks for this change to be made permanent so that people making immigration applicants can continue to submit supporting documents electronically while keeping the originals (unless required for additional checking).

George's story: the impact on a family (and on the NHS) of original documents being withheld

George is a nurse who claimed asylum in the UK in 2014. At that point, he submitted a whole set of important documents to the Home Office as part of his application. As well as ID documents, this included his education certificates. George's asylum claim was refused, went to the Tribunal, and eventually on to the Court of Appeal where he won his case. The Home Office subsequently withdrew their decision and eventually, after a long delay and the threat of judicial review proceedings, George was granted humanitarian protection. However, his original documents were not returned to him, and to this day he still doesn't have them. We have written formal complaints to the Home Office and are currently considering further legal action. The consequences of not having these documents have been severe for George and his family. Without his education certificates, he is unable to re-qualify to practise as a nurse in the UK. While his Humanitarian Protection status means he is entitled to work, the only thing stopping him from working in his chosen profession is that the Home Office has held on to his documents for six years. This also means that in the middle of the pandemic, he is unable to contribute his valuable skills and experience to the NHS.

6. Changes to how evidence is submitted: biometric information

The situation before COVID-19: In the past, each new immigration application required a new set of biometric information (fingerprints and photograph). This cost £19.20 per person and was a requirement for everyone except those with a fee waiver or who were submitting a protection-based application. Applications were submitted at the Post Office, with the fees then transferred to the Home Office. For families we support with limited leave to remain, this meant paying the fee every 2.5 years, for each family member.

In November 2018 private contractors (Sopra Steria) took over this service, on behalf of the Home Office, operating from six core centres (including Manchester) and 50+ other sites around the UK. Sopra Steria is able to charge whatever fee levels they want in exchange for an enhanced service, such as being able to choose an evening/weekend timed-slot for an appointment. The costs are significant and run to hundreds of pounds.

While a limited number of free appointments are made available at core centres, they are extremely difficult to get hold of. The situation became significantly more difficult when Sopra Steria reopened its centres in June following lockdown. For example, one of our solicitors

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calculated that he spent 240 minutes trying to book appointments for just one of his clients. That's four hours trying to search for an available, free appointment. He says "*If the client had to book the appointment themselves, they would have struggled to do so. It would have been very frustrating for them. It was for me.*" Our team found it particularly difficult to source free appointments where multiple appointments were needed e.g. for family groups.

This has a significant impact on people's lives. As our Senior Solicitor reported to [The Independent](#) in July 2020, he had been logging onto the booking website late at night and early in the morning in a bid to find free appointments since visa centres started to reopen, but at that point had only managed to find one. Most of his clients couldn't afford to pay for appointments, leaving them "stuck in limbo" for a prolonged period, and in some cases without access to any public services and at risk of destitution.

"Some of them who had no status before are still stuck with no right to access anything. [Their immigration] decision has usually been made and they're just waiting for the fingerprints to issue the card to prove it. They could've had recourse to public funds months ago, and during this time in particular it's really needed."

As a result of the impact on people in Manchester, Afzal Khan MP wrote to the Home Secretary in August 2020 to raise his concerns about [pandemic profiteering](#). Our legal team continue to submit complaints about the unavailability of free appointments for the people we support.

Change: biometric information submitted as part of a person's previous immigration application can be reused

During the pandemic, the Home Office announced that it would re-use biometric information people has submitted as part of previous applications. This change was very welcome as it saved applicants a considerable amount of time and money. It also prevented the Home Office waiting for information (which it already had) in order to complete an immigration decision. People were only able to reuse previously submitted biometric information if they were contacted by the Home Office with an email invitation. They then had to use the IDV app to submit a facial image while the Home Office retained the ability to ask people to make in-person appointments if further information was required. It suited applicants, legal representatives and it streamlined decision-making. However at the start of October 2020, Sopra Steria announced that the 'temporary' change to re-using biometric information was being scaled back. Only those submitting Tier 4 (student) visas would be able to reuse previously submitted biometrics, everyone else has to go back to making an in-person application with Sopra Steria.

Benefits this brings to the applicant:

- people are not forced to wait or travel in order to access free appointments
- people who are entitled to free appointments are not forced to pay Sopra Steria because there are no free appointments available

Benefits this change brings to legal representatives

- legal advice resource can be more efficiently used because time is not spent chasing free appointments

Greater Manchester Immigration Aid Unit

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Benefits this change brings to the Home Office:

- enables more efficient decision-making as information already held by the Home Office can be reused (rather than decision-makers having to wait for information they already have to be re-submitted)
- still allows for the Home Office to request applicants attend in person if further information is required
- supports agile working practices

GMIAU asks for the reuse of biometric information to be made permanent (not just for student visas) and, where it is not possible to reuse previously submitted biometrics, that there should be sufficient free appointments available that people are not forced to wait or to travel in order to access them.

Solara's story: Reusing biometric information

Solara has had experience of submitting biometric information using the Sopra Steria core centre in Manchester and using the IDV app during lockdown. When her Biometric Residence Permit was stolen, she used the Sopra Steria service at the central library. The process meant she had to clear her schedule and miss a day of work to be available at the booked appointment time, she had to queue when she arrived and, despite staff being present, she was left to complete the process herself.

During lockdown, when her GMIAU solicitor submitted her indefinite leave to remain application, she received an email saying that she would receive a link to upload her photo using the IDV app. It felt streamlined, efficient, more relaxed and more secure than attending the library. Whereas the library meant sharing personal information in a public setting, with staff that were employed by a private company, the app could be used in her home. It also meant Solara could use her mobile data using the app on her phone. Using the app herself felt no less supported than submitting her information at the centre and it meant she could do it in her own time and with no additional risks brought about by traveling during the pandemic.

Conclusion

The changes outlined in this report have made tangible differences to the lives of people making immigration applications during 2020. In our view they have also added flexibility and agility to decision making and court processes, while enabling us as legal aid providers to work more effectively and efficiently. Our hope is that both the Home Office and the courts build on learning through lockdown so that these changes, brought about by COVID-19, are here to stay.

We would like to see

- 1. The Home Office permanently accept fresh claims for asylum submitted electronically**
- 2. The Home Office permanently accept in-country asylum claims lodged in locations around the country**

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3. The Court of Appeal, Admin Court and Upper Tribunal permanently accept applications and appeals submitted electronically
4. The Home Office permanently accept destitute domestic violence concession applications signed digitally or by legal representatives
5. The Home Office permanently accept supporting evidence for immigration applications submitted electronically
6. The Home Office permanently re-use biometric information submitted as part of previous immigration applications

For more information contact Amanda Shah, GMIAU's Senior Policy Officer
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With thanks to Sophie Ahmad and the Paul Hamlyn Foundation.

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