STANDARDISATION:
Streaming, Enrichment & Operational Review Meetings (ORMs)

Version	Date	Authors
1.0	17 May 2017	REDACTED
1.1	8 June 2017	REDACTED
1.2	2 October 2017	REDACTED

Owner: Central Operations Team
Date: October 2017
Version: 1.2

Key objectives of ORMs

- **Ensuring Issue/Refusal rates across work streams are commensurate with known risks and productivity expectations, and where reasonable tolerance is exceeded, that tactical ECM Reviews are targeted to identify emerging or decreasing risks.**

- **Regularly reviewing existing streaming and enrichment rules to ensure they remain valid.**

- **Reviewing evidence of recorded harm throughout the month, to identify any changes required to streaming outcomes and appropriate enrichment activity.**

- **Analysing the value of enrichment checks to the decision, and making recommended changes to business rules to ensure best value achieved.**

- **Identifying any business case for AO Decision Makers and/or reduced document retention policy.**

Streaming

1. The Global Visa Risk Streaming (GVRS) data will be revised every quarter, and cover harm evidence over a rolling 12-month period.

2. Overall harm scores are true and should not be subject to local comparison, that is, an AMBER in one DMC should not be treated as RED in another, just because they represent the highest harm in one particular post. As such, the harm score will be RAG rated centrally to ensure consistency across the network. Initially this will be completed by the Central Operations Team on a 'sense check' basis, but will ultimately be completed by the senior analyst in HO Data Analytics Capability (HODAC).

3. All DMCs should then apply local attributes, as (i) evidenced (ii) discussed and agreed and (iii) recorded at the monthly Operational Review Meeting (ORM).

4. Traditional risk matrices will no longer be produced by I.E. International colleagues. Instead, a one-page risk background document may be used to include research conducted on a risk type identified at the ORM, and so provide application specific information to decision makers. The document can be embedded into PROVISO via a hyperlink in the streaming tool outcome, as copied into the Events page at Data Entry. This will provide more targeted information, readily accessible to the ECO/M.

5. Work streams can differentiate between Settlement, Family Reunion, EEA, PBS (including by Tier) and Visit categories, to aid duty list compilation and productivity expectations in line with skills and training.

6. Work streams should not need to be differentiated by Nationality, with the exception of cases streamed in parallel for same-nationality locally employed ECOs. There should otherwise be no distinction between Green, Amber and Red applications on Nationality grounds.

7. Previous refusals should not be routinely streamed out of their inherent risk, as this is already captured in the GVRS data and the risk does not need accounting for again. Administrative refusals may require a binary assessment process only e.g. have the reasons for the previous refusal been satisfied or the points now awarded? Where a previous refusal decision rested on credibility grounds, we are required to assess each and every fresh application on its own merits, and a genuine statement or document will not always satisfy the decision maker as to the applicant's intentions.

8. Previous harm type refusals – 320 or equivalent, or criminality based refusals – will of course carry more harm.   Whilst CRS does not currently distinguish between high-harm and other refusal types, changes have been requested to identify these separately, to enable a local risk profile for streaming purposes.

9. With the implementation of the Streaming App v3, streaming logic can be included as a "profile narrative", to give decision makers some background into why an application was streamed as it was.   This narrative can be based on the justification provided in the Streaming Decision Log, and ECOs should be encouraged to use this to build understanding.

10. Responsibility for correct streaming, and the streaming rules built into the Streaming App, rests with the ROM.

11. Where cases have been streamed incorrectly, they should be alerted to the Ops ECM and cc'd to the Regional Integrity Manager. It may be that a false streaming result has occurred due to inaccurate data entry or incorrect responses to the Question Tree. The Ops ECM should therefore notify the relevant line manager for performance monitoring, and return the file to the appropriate work stream without delay.

11. The final RAG rating does not determine the decision, only the process. Refusal rates should be monitored; as an overview across each local work stream and also via the Review-to-Risk policy. However, parameters must not be set so as to avoid unconscious bias. Tolerance levels must therefore be expected, and any significant deviation should be used only to identify any potential changes to the associated risk.

Binary Work Streams

Standard Operating Procedures state that AO Decision Makers can be used
>(i) where minimal problem solving skills or judgement are needed to verify responses to questions and documents presented
>(ii) to confirm that valid specified evidence has been provided
>(iii) to assess that there has been no material change since any previous decision to issue a visa and
>(iv) where there is no VIMA match apart from notification of a previous Issue or ECR.

As streaming and enrichment has developed, and subjective judgement addressed through objective enrichment activity or intelligence analysis, more straightforward Green applications have been identified. However, risk does not necessarily align with complexity.

Objective visa routes include Tier 2 ICT, Tier 5 YMS, and Tier 4 applications, where the low risk negates any additional genuineness assessment and so the decision made against a points score alone.   Objective categories may also include Visit-Standard and Visit-Transit where the applicant has previous travel and compliance, and the assessment limited to a change of circumstances consideration only. Preferred Partner schemes also require an objective assessment only, where the sponsoring organisation has provided an additional level of assurance.

Please refer to AO Decision Maker SOPs for full details.

Local streaming outcomes may therefore need to distinguish between binary and non-binary Green applications, to route applications separately to the appropriate grade decision maker.

Enrichment Framework

Whilst the original enrichment framework offered justification and proportionality to the risks represented by a cohort of applications, the enrichment type itself was not always necessary. Additionally, some options for

enrichment activity were not appropriate, due to language capability, interview capacity etc. The framework has therefore been updated to offer a more flexible approach.

1. Level 1, 2 and 3 checks have been simplified and redefined as
   (i) Operating Mandate
   (ii) Non-Complex
   (iii) Complex
   Operating Mandate Checks must be completed on <u>all</u> applications.

2. Non-Complex checks are completed at the front end of the application process, with the aim of adding value and reassurance to the decision making process. Non-complex checks can apply to any stream of application – GREEN, AMBER or RED - but must be identified and agreed following the ORM process below, and subject to regular review to establish ongoing value and necessity. It is unlikely that that they will be routinely necessary for Green cohorts, but very quick internal checks such as MIDA may still be justified.

3. Complex checks, still defined as those that are more resource intensive or may contribute significant delay to processing times and so impact upon CSS targets, remain proportionate only to high risk applications. As such, these should continue to be identified at the back end, by the decision maker, where a RED application falls to be issued. This may or may not be after any appropriate non-complex enrichment activity has been completed, as defined at the ORM. ECM Approval is mandatory.

4. The revised framework therefore allows some flexibility across the work streams. Whilst a high risk RED application must still be enriched to some level (unless exceptional positive indicators apply, such as an OGD facilitation or high profile event), it is recognised that a specific risk attributed to a RED application may be more effectively mitigated by non-Complex enrichment activity/activities for example.

5. Equally, enrichment activity may add no value at all to a specific AMBER cohort. However, as some risk has been attributed, the decision to circumvent enrichment activity – with reasons – must be recorded in the Streaming Decision Log.

6. All recommendations for enrichment activity, as identified by inherent risk, must be discussed at the ORM following the JAPAN principle for risk assessment i.e. all actions are

        J – Justified – RAG rating is based on known evidence or intelligence

        A – Appropriate – the enrichment activity is the right one

        P – Proportionate – resource intensive checks limited to highest risk

        A – Auditable / Authorised – ECM Review-to-Risk, Streaming Decision Log, Complex Case process

        N – Necessary – to help ECO decision making process

<u>Flexible Enrichment Framework</u>

	GREEN	AMBER	RED
Ops Mandate	✓ mandatory	✓ mandatory	✓ mandatory
Non Complex	✓ ad hoc only; not generally necessary	✓ routine	✓ routine
Complex	✗	✗	✓ mandatory, if Issue and non-Complex checks not otherwise appropriate

Operating Mandate – Must be completed on all applications – GRN/AMB/RED		
2-way Imposter check	CRS	Local Alerts
VIMA	WICU	PNC
Non Complex – Front end checks, add reassurance to the decision making process – GRN/AMB/RED		
Local Business Registration	Local Tax	Employment Checks
MIDA / Exit Checks	Open Source	i-Search / CRS / CID
Hotel Bookings	Companies House	GB Accelerator
Initial Forgery examination	Telephone interview	Sponsor interview
5CC / Other missions	Multiple sponsor check	OMNIBASE / HMPO
WorldPay	Pre-assessment	VC Language interviews
Bank / Financial Institution	UK - Birth / Marriage / Death certificates	Detailed forgery examination
VTC Child Settlement	Immigration Authority	CNS Nationality
V+ (inc DWP)		
Complex – Back end checks (Issues only), where results not delivered quickly – RED		
UK:		
CT Checks	Face-to-face Interviews/ Debriefs	SIT / SMU
Evidence & Enquiry reports	DNA	Field trips
LIT / ICE		
Host Authority:		
Host authority - Birth / Marriage / Death certificates	Local criminality checks	Police Referral Programme

7. Enrichment activity is designed to help inform decision making by providing the decision making with additional information against which to make a decision on the balance of probabilities. Whilst it may help to mitigate against the risk, it will not always negate it.

8. A positive enrichment outcome should therefore solely provide corroboration of a local attribute already built into the streaming logic i.e.

> e.g. Nationality + VAC + Endorsement = RED application. Previous travel is identified through the streaming App as a positive attribute, and so application streamed to an AMBER endpoint. An ensuing Non-Complex MIDA check corroborates the local attribute to inform decision making.

> e.g. Nationality + VAC + Endorsement = RED application. Employment and salary identified as a local attribute which re-streams the application as AMBER.   Non-Complex Employment checks subsequently confirm the job as stated.

9. Positive enrichment outcomes therefore should NOT be used to re-stream an individual application post result, or provide a secondary uplift. Instead, enrichment outcomes should be reviewed strategically at the ORM and used to inform changes to the streaming App at the front end.   So, if the ORM is satisfied that previous travel and compliance completely negates all the harm types recorded, streaming this cohort of applications as GREEN in the first instance may be justified.   MIDA checks may still follow.

10. Conversely, where the enrichment activity results in an adverse outcome, the application should be re-streamed as RED, regardless of the original risk. This is justified as additional harm has been evidenced.

11. ECM Approval is prescribed for an ECO referral for a proposed course of action, where the ECM needs to confirm that a process or Rules have been applied correctly e.g. IDENT – HO reports, DER/DVRs, GSR interviews, para 320 and equivalents, restricted validity etc. The ECM is not required to view any further documents or the VAF as part of the approval process. ECM Approval also includes cases streamed as Red, where minimal enrichment activity has been undertaken but there are "exceptional positive indicators" that mitigate the proposed outcome (Issue). These may include high profile cases. An ECM Approval also provides confirmation that an application has followed the appropriate enrichment, and is not considered enrichment in itself, unless minimal/no activity has taken place due in exceptional or high profile cases.

12. A full ECM Review is defined as the process of looking at the decision, and the justification of the issue notes or refusal notice. The reviewer must review the full application after the ECO has made the decision. By definition therefore, ECM Reviews do not enrich the application for the decision maker, and as such, are not classified as an enrichment activity.

13. All enrichment activity – positive and negative – should be captured in a log and reviewed at the ORM. An Enrichment Data Capture (EDC) tool is under development and after testing has been completed, will be rolled out to the regions. The tool will be included in the App Suite – an Access database – and designed to enhance MI for the ORM process. It will encompass
> (i) the Enrichment Activity Report
> (ii) a back end database which can migrate to i-LORD, and can be filtered for analysis at the ORM
> (iii) value of the enrichment activity type to the final decision, automated from PROVISO
> (iv) a referral breakdown source, including the streaming tool or specific user. This will enable analysis of the streaming logic, and ECO/M performance
> (v) timings of enrichment activities to identify quick wins

Operational Review Meeting (ORM)

1. The ORM should be held monthly at all DMCs and represented by:
> (i) UKVI Regional Operations Manager (Chair)
> (ii) Streaming / Enrichment ECM/O
> (iii) DQ ECM/O if different from above
> (iv) ILM
> (v) ILO
> (vi) Regional Integrity Manager
>
> One member of the core committee should be given responsibility for maintaining the Streaming Decision Log. Additional representatives may attend as required.

2. Prior to each ORM, the Streaming Decision Log should be circulated for all parties to review rules from the preceding month, and consider any additional recommendations.

3. At this stage, the Streaming or DQ ECM (as delegated by the ROM) is responsible for analysing the monthly data from:
> (i) the Visa Concerns dashboard
> (ii) the Enrichment Data Capture (EDC) database or equivalent
> (iii) DQ reports / ECM overturns
> (iv) OPIs
>
> and prepare a summary of findings to present to the ORM.

4. At the same time, I.E.I. should review
> (i) Threat Assessments
> (ii) Intel reporting
> (iii) i-LORD or equivalent
> (iv) any other relevant investigation requirements

and present risks to the ORM.

5.   The Streaming Decision Log should then be re-circulated to the ORM committee, including any new recommendations for discussion, prior to the ORM Meeting.

6. All recommendations should be discussed at the ORM, following the J.A.P.A.N. principle for risk assessment. This includes any streaming rules which are due for review, to ensure they remain relevant.

7. ALL proposals, whether accepted or rejected, should be recorded in the Streaming Decision Log.

8. A template Streaming Decision Log is available on SharePoint. It is recommended that DMCs add local filters to facilitate M.I.

9. DMCs should consider whether each new risk rule needs to be shared with any other DMC, that is, where the cohort of applications may also apply. This may apply to net migrations routes repatriated to Sheffield, ICQAT, or other regional DMCs.

10. The Streaming Decision Log should be signed off by the Regional Operations Manager, Regional Manager or Regional Director.

11. Where low risk applications have been subject to a regular review process and established into the streaming logic, the Regional Operations Manager may wish to submit further recommendations for revisions to document retention policy – see OPI 694.   The decision log should be used as evidence for any associated business case submitted for authorisation by the SCS.

12. The ORM should also effectively serve as a TCG, to agree tasking in terms of resource allocation (i.e. enrichment/interviewing - UKVI resource) and further research/analysis (Immigration Intelligence resource).

13. Streaming Decision Logs, and any accompanying ORM minutes which may have been recorded, must be saved and readily available to the management team and ICI for inspection. Logs are subject to a DO NOT DESTROY policy.

Summary – Building Blocks

1.	Issue Rates	Expectations for each stream should NOT be set, as may lead to unconscious bias. However, locally agreed tolerance levels for each work stream may be set, to identify and emerging risks for review at the ORM.
2.	Previous Refusals	Previous refusals should not be routinely streamed out of their inherent risk, but assessed on their own merits. CRS changes will be made to distinguish high-harm from other refusal types, to effectively stream deception and criminality cases separately.
2.	Post enrichment streaming	Enrichment is verification of information on the VAF. Positive enrichment should not routinely result in re-streaming, but used to identify any mitigation and so inform decision making.
3.	320 (equiv) refusals	320 or equivalent refusals should be streamed as RED, in line with newly evidenced harm (deception). Not to be considered a binary decision.
4.	ECM Approval / Review	ECM Approval or Reviews are not an enrichment activity. Whilst ECM Approval should be used for Red Issues where minimal enrichment activity been undertaken, this should be where there are "exceptional, positive indicators" only i.e. high profile, UK interest, OGD facilitation etc. It should not be used routinely for the omission of enrichment activity.
5.	'Binary' work stream	A separate work stream can be identified, using dedicated Outcomes in the Streaming App, and annotation in the spare field for the Stage & Age. An application is not defined as binary purely by low risk alone, as Green

		applications may still require some subjective judgement. These can be agreed regionally.
6.	**Global productivity expectations**	To be revisited after a period of standardisation.