

Streamlining success: Building a world-class visa process for the UK



Contents

| | Page |
|---------------------------------------------------------------|-----------|
| Foreword | 5 |
| Introduction | 6 |
| Executive summary | 7 |
| The importance of a world-class visa process to the UK | 11 |
| The UK's current system | 12 |
| International context | 19 |
| Our recommendations | 26 |
| Conclusion | 43 |
| Bibliography | 44 |
| Glossary | 45 |
| Notes | 52 |

A world-class visa application system

Timeline for recommendation implementation

| | By Jan 2020 | By Jan 2021 | By Jan 2023 |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Reducing administrative burden (p.32) | 'A-rated' sponsors can certify English language ability Enhanced visibility and reliability of visa processing times Improved error handling and complaints system | Removal of police registration requirements | |
| A digital immigration status (p.35) | Elimination of visa vignettes Full rollout of electronic right to work checks | Implementation of digital immigration status, to run concurrently with biometric residence permits (BRPs) | Elimination of BRPs for new applications |
| Simplifying extensions (p.37) | Secure and efficient reuse of data to avoid re-entry by applicant | | Elimination of further leave to remain applications – extension via SMS notification |
| Tailored support for sponsors (p.39) | Rollout of outreach programme for SMEs that need to apply for a sponsor licence to sponsor EU citizens | Enhanced sponsor management systems functionality(SMS) A more flexible payment system | |



Foreword

London's success as a leading global business centre is founded on the finest talent and skills from around the world. London has the best pool of talent for financial services in Europe, the largest number of highly skilled knowledge-based jobs in the world and draws its business leaders from the widest pool of countries.

Complementing a highly skilled UK workforce, international workers make up 41% of the City's workforce, and 34% of London's finance and insurance jobs. Access to this talent is therefore a critical part of London's competitive offer.

This report examines the business experience of using the UK's visa system and sets out practical steps to improve, first, the process that allows firms to recruit international talent and, second, the user experience for people going through the process.

The UK needs a world-class visa system that works reliably, efficiently and robustly, for employers as well as eligible employees. Regardless of the overall immigration policy the Government chooses to adopt, we should be aiming to make the process of applying to come to work in the UK as smooth and efficient as possible.

Businesses depend on the UK visa system to get the right people to the right place at the right time, whether fast-growing start-ups requiring specialist coding expertise or more established institutions looking to transfer highly skilled staff across international offices

for specific projects. However, users can experience this process as burdensome and unpredictable.

The report identifies technological advancements that provide opportunities for streamlining the process and reducing costs for businesses and individuals. Alongside this, it draws on international best practice to set out ways of simplifying the process to the benefit of all parties involved.

The recommendations identify 'quick wins' and practical medium-term recommendations, as well as a vision for the long term. Acting on these recommendations would deliver an effective and efficient 'best-in-class' visa system, enabling the access to global talent that businesses need and reinforcing the UK's global competitiveness.

I would like to thank everyone who has been involved in this project for their support. Special thanks are due to the team at EY for their work and contribution to this important debate.

Catherine McGuinness,
Policy Chair of the City of London Corporation



Introduction

EY were delighted to be invited to work with the City of London Corporation on this important and timely piece of research – to consider the operation of the UK's visa application system and how it can be improved to become a truly world-class system for the future.

The operational developments heralded by the implementation of the points-based system (PBS) in 2008 redefined the UK's immigration processes, initially simplifying many outdated practices. However, in subsequent years, the mechanics of obtaining permission to enter the UK, to set up business here, has developed in complexity, with many unintentional and adverse consequences for those wanting to invest and work here. Ten-years have passed since the PBS was introduced and it is time for a positive reassessment of the processes that underpin our immigration policy.

With this in mind, and when conducting our research, it was clear that businesses fully understand the need for appropriate immigration controls – and that visa candidates are willing to evidence their right to be in the UK. They do, however, seek certainty, efficiency and reliability in the systems they are required to use, so they can plan their business operations and their personal obligations alongside the logistics

of travel. This is all within our reach if we choose to take advantage of some short-term goals while planning for longer term transformation.

The UK remains a highly attractive location to achieve business and personal aspirations. Taking steps to accomplish ambitious changes to our immigration processes will ensure we remain competitive for many years to come – and we continue to attract the workers, students and businesses we need to prosper.

Margaret Burton,
Partner, Global Immigration, EY

Executive summary

Developing a world-class visa process

As the UK leaves the European Union, and thinking is under way as to how we reshape our immigration policy, now is the perfect time to build a world-class visa process for the UK. The City of London Corporation and EY have **produced this report to make a series of practical and constructive recommendations on how this can be achieved.** We want to build on existing good practice in the system, and learn from international experience, to make the process of applying for a visa as efficient, reliable and user-friendly as possible.

This report does not try to determine what our immigration policy should be, but is **focused on improving the user experience of applying for and receiving a visa to work in the UK.** These recommendations, if adopted, will improve the experience for individuals, businesses and government.

Once UK immigration policy has determined an individual can travel to the UK to study or work, the process should not be burdensome. We want those participating in the process to feel it is **fair, proportionate and professional.** This is in everyone's interest and is a clear way for the UK to demonstrate it welcomes talented and committed people coming to work here.

This is key to **ensuring the UK remains competitive – the country of choice for applicants and a world-class system of choice internationally.**

Our findings and recommendations are primarily inspired by interviews with the financial and professional services and technology sectors, although the **proposals themselves are relevant to all sectors wherever they are based in the UK.** We engaged with:

- A **wide range of organisations within the financial and related professional services sector**, their employees and industry and trade bodies, to understand their views on how the UK's visa application system works in practice.
- **UK Visas and Immigration (UKVI)**¹, to recognise their future objectives to ensure alignment with our own proposals.
- **EY's global immigration practice**², to assess the UK's visa application system in a global context.

The majority of those we engaged with **offered commentary on the challenges associated with Tier 2 of the PBS.** This is not entirely surprising – Tier 2 is the main route used by nearly 30,000 UK employers to bring overseas talent to the UK as there are few alternative visa options available. Of 245,131 work visas granted inside and outside the UK in 2017, Tier 2 visas made up over 60%³. As one of the most frequently used visa categories but also one of the most procedurally complex, employers, individual applicants⁴ and trade bodies would like to **see improvements to the processes and procedures involved with sponsoring Tier 2 visas.**

¹ The operational wing of the Home Office that runs the UK's immigration system

² The practice assists with more than 100,000 visa applications worldwide each year

³ Office for National Statistics, 'Immigration Statistics', (August 2018), available at: <https://www.gov.uk/government/statistics/immigration-statistics-year-ending-june-2018>

⁴ Including employees and assignees who have applied for a visa, either by themselves or with assistance

Although this report therefore focuses on the Tier 2 process, many of our recommendations will benefit other visa applicants and sponsors.

Stressful, inefficient and precarious

Employers and applicants highlighted to us aspects of the UK's current visa system that worked well for them and we have considered these comments in our report. However, they told us there were also significant challenges associated with the system, and in particular Tier 2 of the PBS.

These challenges include:

- Employers must apply for and maintain a sponsor licence – a **complex, administratively heavy and lengthy process that is particularly challenging for SMEs** (whether originating in the UK or overseas) that have not used the system before. Employers were keen that those demonstrating compliance with their sponsor duties⁵ should receive additional benefits such as access to a streamlined process.
- The system's reliance on the submission of 'original' documents to support visa applications and on physical immigration documents (e.g. visas, biometric residence permits) is **inflexible and raises concerns that we are falling behind international best practice** – many of the UK's competitors for international talent have moved or are moving to an electronic system for demonstrating immigration status.

- Employers and individuals are often required to resubmit data that UKVI already holds. This is frustrating and erodes confidence in the system as there is an expectation that data should be handled more efficiently through technology.

These and other factors combine to create a system that – as one interviewee explained – has become **“stressful, inefficient and precarious” for both employers and visa applicants.**

The impetus for change

Our UK visa process has developed considerably since the introduction of the PBS in 2008. However, in 2018, parts of this process appear outdated while other stages have been added to the original application journey – adding to the overall complexity for applicants and employers.

In addition, as we move ever closer to the UK's departure from the EU, this immigration process demands further scrutiny. The Government has agreed with the Migration Advisory Committee (MAC)'s recommendation⁶ that post-Brexit⁷, EEA and Swiss nationals should be subject to the same immigration control as workers from the rest of the world. Whilst the UK is currently considering exactly what this immigration policy should look like, and whether it will be possible to negotiate a reciprocal mobility agreement with the EU⁸, now is also the time to consider the procedural operation of the UK's visa system.

If EEA and Swiss nationals need to apply for visas from 2021 in order to work or study, **the administrative and financial burden associated with the application process risks becoming a deterrent to the skills, investment and entrepreneurial spirit the UK wishes to attract.**

A modern, world-class visa application process that combines a user-friendly system with appropriate border controls should:

- Recognise and adopt technological and procedural developments pioneered by other countries' visa systems while developing its own vision of future excellence – recent Home Office developments in technology to facilitate the EU Settlement Scheme is an example of this.
- Look to simplify processes and offer increased flexibility to resolve challenges caused by unintentional errors by applicants, UKVI and UKVI's outsourced service partners.
- Be open to rethinking how border controls can best be exercised to provide a more predictable system.
- Have a robust, continuous feedback mechanism involving dialogue with system users – both to aid clarification of process and resolve challenges with urgency.

Our recommendations

In considering the principles highlighted above, we have developed **four key recommendations for how the UK's visa application system can be developed into a world-class, future-ready process.**

- A future system should **reduce the administrative burden and uncertainty associated with visa applications.** Outdated and redundant process steps such as police registration should be eliminated entirely.

A UK visa application is typically made up of many different processes, requirements and touch points with overlapping, interdependent and uncertain timeframes. Streamlining these steps will decrease stress for applicants, increase certainty for employers and save time and costs for Government.

- A future system should **rely on an entirely digital immigration status** so that applicants no longer need to surrender their passport or update physical status documents. Maintaining a reliance on purely physical evidence of immigration status risks our system becoming outdated and falling behind our global competitors.

A digital immigration status will speed up the application process, eliminate bottlenecks associated with the production of physical immigration documents and all verifications – right to work checks, right to rent, bank checks and so on can be carried out online.

- A future system should **avoid duplicative processes associated with extending a visa inside the UK.**

⁵ The set of responsibilities associated with holding a sponsor licence, including performing right to work checks and retaining documentation

⁶ Migration Advisory Committee, 'EEA migration in the UK', (September 2018), available at:

<https://www.gov.uk/government/publications/migration-advisory-committee-mac-report-eea-migration>

⁷ Likely from 2021, subject to the agreement of a 21-month transition period as per the draft withdrawal agreement

⁸ Refer to the mobility framework detailed in the Government's recent White Paper – HM Government, 'The future relationship between the United Kingdom and the European Union', (July 2018), available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725288/The_future_relationship_between_the_United_Kingdom_and_the_European_Union.pdf

Eliminating physical visas and making intelligent use of the data already held by UKVI offers the opportunity to remove the need for visa extension applications inside the UK. Visa extensions should be facilitated by employers simply notifying UKVI via their sponsorship management system. These efficiencies will save time and costs for employers and UKVI alike.

- A future system should **use technology and guidance to provide tailored support to employers/sponsors** of different sizes and in different sectors to encourage investment and growth in the UK.

As already identified by the Migration Advisory Committee⁹, start-ups and SMEs shouldn't have to fight against an overly complex process. Similarly, the sponsor management system (SMS) should scale appropriately to support sponsors applying for larger numbers of visas by offering advanced reporting and upload features.

It is important to acknowledge that these goals are ambitious and some cannot be achieved overnight. Later on in this report we provide detail on the short and medium term improvements that will function as interim steps as we move towards the full realisation of the system's potential.

The UK is a highly attractive location to visit, study, work and set up business. However, it is imperative that **changes are made so that the UK's future immigration process is both ambitious and dynamic** – ready to change for the benefit of the country and those we wish to attract. Moving positively from a process that is stressful, inefficient and precarious to one which is helpful, efficient and predictable will ensure we are the country of choice for applicants and employers – a country that operates the immigration system to which other countries aspire.

The importance of a world-class visa process to the UK

Access to the best global talent is a key factor in determining the success of financial and professional services firms in the UK. Clearly the UK's visa process has the potential to affect the overall attractiveness of the UK to investors, employers and talent from overseas. Research by EY¹⁰ in 2018 found that the UK's appeal on qualitative measures has fallen significantly in the last two-years. Investor perceptions of the quality of life, diversity in the UK, the degree of stability in the social climate, and the transparency and predictability of politics and law have all fallen. The UK is seen as less welcoming than it once was and the UK environment is seen as less pro-business.

The UK's visa process is key because it governs the ability of non-EU citizens, and in due course EU citizens, to enter the UK, whether for a visit, or to live, study and work on a temporary or permanent basis. Inefficiencies and delays in this process have the potential to frustrate business planning. Considered cumulatively, these challenges can take up many days of both employers' and applicants' time.

The objective of this report is to identify challenges associated with the UK's current visa process, and to make recommendations to improve the user experience and efficiency of applying for and receiving a visa to work in the UK. In turn, this will offer the UK a competitive advantage over other global financial and professional services centres that have more complex, restrictive or cumbersome visa processes.

The scope of this report reflects this objective and is as follows:

- To consider the practical process of applying for a visa rather than the underlying policy of who should be eligible for a visa.
- To establish how employers and employees within the financial and professional services sector interact with the UK's visa process.
- To focus on Tier 2 of the points-based system – the primary immigration route used to obtain work visas for non-EU citizens.

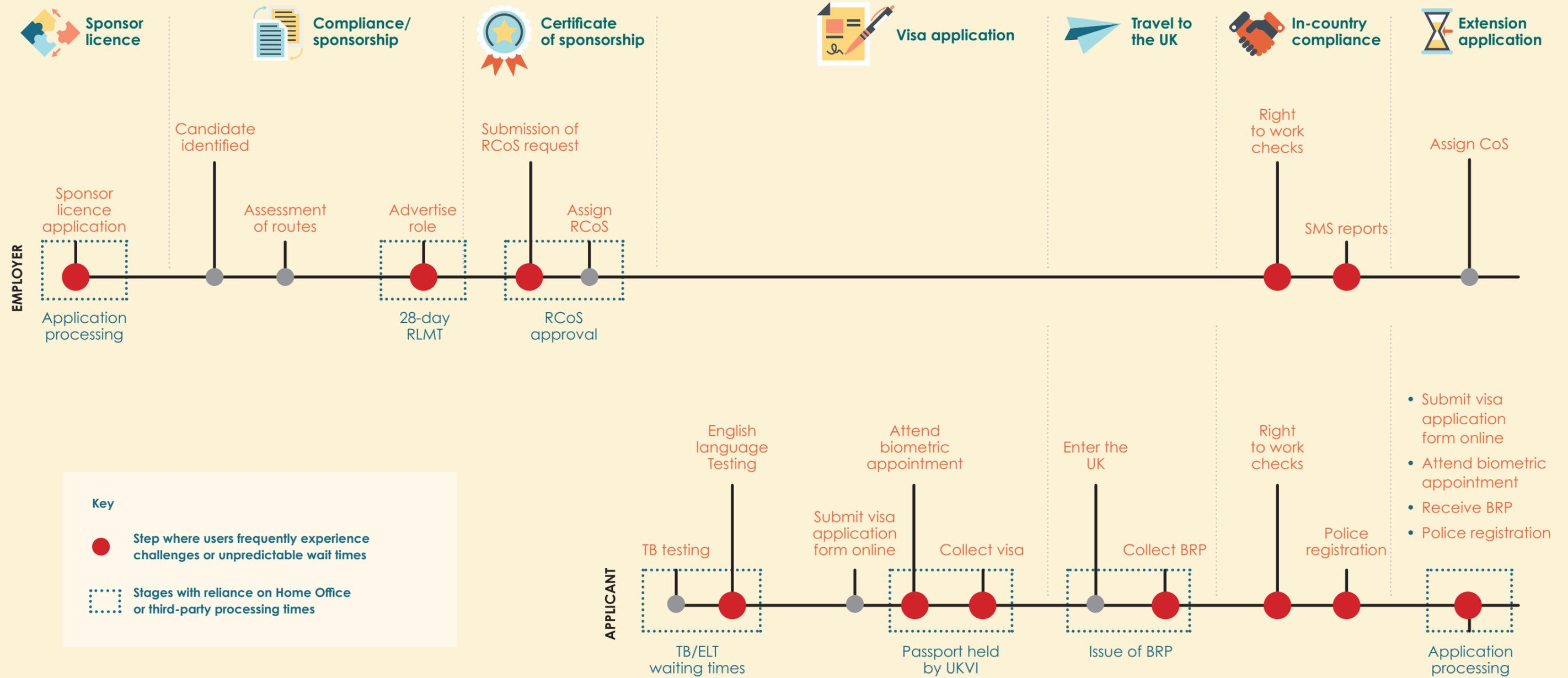
Many of our findings and recommendations also apply to other immigration routes into the UK, and will support employers in other sectors in attracting and retaining the best global talent.

⁹ Migration Advisory Committee, 'EEA migration in the UK', (September 2018), available at: <https://www.gov.uk/government/publications/migration-advisory-committee-mac-report-eea-migration>

¹⁰ EY, 'UK Attractiveness Survey', (June 2018), available at: <https://www.ey.com/uk/en/issues/business-environment/ey-uk-attractiveness-survey>

The UK's current system

Processes associated with a typical Tier 2 (General) visa application



Acronyms

CoS/RCoS – Certificate of sponsorship/Restricted certificate of sponsorship
 RLMT – Resident labour market test
 SMS – Sponsor management system
 TB – Tuberculosis
 ELT – English language testing
 BRP – Biometric residence permit

The origins of our current system

The UK's current system dates back to 2008, when it replaced a scheme characterised by subjective decision-making with a new 'Australian style' points-based system (PBS). The PBS had three key aims:

1. *Better identifying and attracting of migrants who have most to contribute to the UK.*
2. *A more efficient, transparent and objective application process.*
3. *Improved compliance and reduced scope for abuse¹¹.*

The Labour Government of the day framed the former work permit system as "complex and difficult to use" and stated that "it does not reflect the UK's competitive position in the global economy as a destination for the brightest and best migrants". The PBS therefore intended to deliver an internationally competitive immigration scheme which could attract the brightest and best – a system flexible enough to "respond to a changing labour market, in terms of both supply of and demand for migrants"¹².

Our engagement with users of the system

To gather evidence for this report we conducted detailed interviews with employers of varying sizes within the financial and related professional services sector, their employees and industry and trade bodies, to understand their views on how the UK's visa system works in practice. These interviewees have first-hand experience of navigating the numerous processes and procedures associated with sponsorship and applying for a visa, both as employers and employees. We have summarised the key concerns of these interviewees below.

A system that is stressful

Respondents described a system that they frequently found stressful to use, typically because of requirements that are unclear or because an objective that seems as though it should be simple to achieve is actually extremely difficult or counter-intuitive. Examples include:

- Visa applicants expressed frustration that despite speaking fluent English, as could be demonstrated via a short conversation with a UKVI official, they were required to sit a time-consuming and expensive English language test, delaying entry to the UK and jeopardising the business objectives necessitating their entry.

- Visa holders who have experienced the theft or loss of their biometric residence permit (BRP) whilst outside the UK, commented that they could not understand why the process for returning to the UK required them to reapply for a new visa, which took several weeks before being able to travel, separating them from family and delaying urgent business commitments.
- HR staff expressed that they were generally supportive of UKVI offering optional priority services but that they found it extremely difficult to justify the additional high cost to stakeholders within the business when the expedited timeframes offered by those priority services were exceeded – the question frequently asked is, 'What are we paying for?'
- The process of applying for a sponsor licence was described as 'intimidating' for new sponsors, with over 300 pages of guidance and the prospect of having to submit multiple applications to learn through 'trial and error' how to apply successfully. This challenge is particularly acute for SMEs and start-ups, diverting significant resources away from establishing a new corporate presence or business development.
- The resident labour market test (RLMT) was identified as counter-intuitive. Some respondents commented that the requirements for conducting a compliant RLMT were so specific and out of step with modern recruitment exercises, that they were forced to conduct an RMLT, having already advertised the role previously, purely to comply with UKVI requirements.

Case study: Biometric residency permit collection in the UK

Visa applicants and their employers reported significant delays with the production and delivery of BRPs to designated Post Offices¹³ on a migrant's arrival to the UK, leading to:

- Uncertainty and stress for the applicant, wondering whether their visa status has been cancelled.
- Postponement of international travel.
- The need to repeatedly explain their situation to their employer, who may be considering whether they can commence or continue employment without seeing the BRP.

Some applicants reported that Post Office staff were unaware of official guidance on who can collect BRPs on behalf of family members, and were unable to provide any indication of when the BRP might become available. Instead, applicants were told simply to return in a few days, resulting in multiple wasted trips.

11 HM Government, 'A Points-Based System: Making Migration Work for Britain', (March 2006), available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/272243/6741.pdf

12 Ibid

13 A physical ID card which acts as evidence of the holder's immigration status, or visa, in the UK

A system that is inefficient

Respondents described a system containing numerous inefficient process steps that they perceived could either be eliminated without undermining immigration controls or otherwise simplified. Examples include:

- Visa holders do not understand the need to register with the police as UKVI holds their personal details, and they report personal address changes to both UKVI and their sponsor. This issue is exacerbated by increasingly poor availability of appointments at the Overseas Visitors Records Office in London.
- Employers reported that they invested significant HR resources in managing and performing right to work checks. Whilst respondents agree with the importance of performing checks, they felt that considerable time was taken up dealing with 'outliers', including cases where there have been lengthy delays in UKVI making the BRP available for collection by the employee.
- Visa applicants were surprised at being asked to provide the same biographic information to UKVI up to four or five times throughout their stay in the UK and questioned why information cannot be reliably reused from previous applications, saving time for them and UKVI.

- The sponsor management system is frequently described by corporate users as being outdated and unwieldy. It does not support reporting or upload functionality and it is difficult to locate an application via the search function to ensure efficient compliance.
- Employers commented that in some cases they would appreciate the flexibility to support their staff by making payment of a visa application fee or immigration health surcharge (IHS) on behalf of the employee, but could not do so without accessing the applicant's application form directly, viewing significant amounts of private data. Alternatives include providing credit card details to the applicant (typically not permitted due to financial controls) or requiring the applicant to claim the amount back through the expenses system. This may not be an option if the applicant does not have sufficient cash funds at the time of application.

Case study: Police registration¹⁴

Respondents raised challenges related to the police registration process:

- Applicants frequently experienced confusion concerning whether they are required to register. On occasion, applicants of a nationality usually asked to register were not given explicit instructions to do so. On enquiry at the police station itself, it was not always clear whether registration was required.
- Applicants also raised concerns stemming from delays at the police station and frequently cited being sent away when attempting to attend as instructed. In some cases they were concerned that there would be repercussions for not having been able to register due to delays at the police station. Others were given appointments at a later date and were concerned about the delay affecting their ability to travel.

A system that is precarious

Respondents described a system that is unpredictable and which can have an impact on business, the applicant and the reputation of the UK overseas. Examples include:

- Visa application processing times that, particularly outside the UK, respondents described as being highly unpredictable and unreliable. The requirement for applicants to submit their original passport was highlighted as increasing the impact of this uncertainty as it disrupted critical business and personal travel.
- Corporate respondents reported that they experienced significant challenges associated with the annual limit on skilled migration (the Tier 2 'cap') between December 2017 and July 2018. Positions were left vacant for many months and applicants were left waiting overseas hoping that a restricted certificate of sponsorship would be granted. Some offers made to skilled candidates from overseas had to be revoked due to continuing uncertainty, causing distress to applicants and staff shortages for UK business.
- Respondents were concerned about the frequency with which UKVI or visa application centre staff asked for documentation not required by the immigration rules, causing applications to be delayed or refused.

¹⁴ Dating back to 1914 and largely unchanged since the Cold War, the police registration provisions require nationals of 42 countries to register their status with local police in the UK and inform the police whenever their personal details change – this must occur within a prescribed time limit

Business and personal impacts

Respondents reported that these challenges had significant business and personal impacts, including:

- Significant delays in filling key positions in the UK, or in extreme cases, the loss of a talented candidate to another employer or location.
- Considerable extra costs associated with internal management of process.
- The uncertainty that is inherent in many aspects of the visa application system encourages employers to build 'slack' into their business planning as they can never be certain that an applicant will be able to start in the UK on any given date. This leads to inefficient utilisation of staff and extra costs associated with frequently changing travel arrangements.
- Visa holders are made to feel unwelcome when applying to come to the UK by virtue of their poor experience of applying for a visa, which has an impact on the UK's reputation and potentially discourages other applicants. Productivity at work and family life can be affected in extreme cases.
- Significant time lost to administrative activities associated with applying for and extending visas, including repeat visits to visa application centres, Post Offices and police stations.

Case study: Right to work checks

A number of corporate respondents raised concerns about the right to work process being outdated and in need of review. Employers highlighted multiple instances of biometric residence permits not being produced prior to the candidate's visa vignette¹⁵ expiring. This can create a situation where the employer is forced to choose between maintaining a compliant approach and delaying, suspending or terminating the candidate's employment, or else risk a civil penalty of up to £20,000 or potential loss of their sponsor licence.

Companies also suggested that the requirement to check a physical document was not always conducive to many working practices, for instance where employees are working on off-site contracts or working remotely.

- Difficulties in conducting urgent business or personal travel, particularly associated with key trade negotiations or contractual responsibilities, family illness or bereavement, caused by the applicant being unable to retrieve their passport from UKVI.

International context

As part of our research, we examined the immigration systems of other global locations, focusing on countries that compete with the UK and/or those that have visa application processes perceived as 'forward-thinking'. These include:

Australia, Brazil, Canada, China, Germany, Hong Kong, Ireland, Israel, Luxembourg, New Zealand, Singapore, South Korea, Sweden, Switzerland, UAE (Dubai) and the US.

The aim of this exercise was twofold:

1. To learn from the best practice of other jurisdictions; *and*
2. To identify challenges that are specific to the UK and necessitate innovative solutions.

Any comparison between the UK's immigration system and that of any other jurisdiction should recognise the challenges of this approach. Countries may have diverse immigration objectives and political aims, leading to systems and processes that can be fundamentally different, or represent an alternative way of balancing different and often opposing process characteristics.

Differing objectives?

Judging the overall and comparative attractiveness or effectiveness of global immigration systems is not straightforward. Some administrative processes, such as those operated by Singapore or Canada, might be celebrated for their modern and technologically savvy approach. Other systems, such as Hong Kong's or Sweden's, might be comparatively cheap for employers looking to resource talent from overseas. In contrast, the speed of the immigration process in countries such as China or Ireland is often criticised while at the same time offering a fairly predictable and transparent route for migrants. This is relative to the faster but complex and process-heavy system offered by the UK.

In comparing the UK's system to those of other jurisdictions, we have primarily considered speed, cost, convenience and technology. Further explanations of specific elements of other jurisdictions' immigration systems can be found in the recommendations section and glossary.

¹⁵ Non-EU nationals applying for a visa of more than six months from outside of the UK are now granted a 30-day visa vignette – a 'sticker' inserted into their passport confirming the details of their permission to enter the UK – before collecting their biometric residence permit on arrival in the UK

Comparing immigration systems: speed

Respondents highlighted speed as being one of the most important factors associated with the relative attractiveness of a visa application system. Businesses must be able to respond rapidly to changing needs and their clients' demands, and a visa system that enables them to fill a new role or bring in an expert from an overseas branch in weeks rather than months offers a clear competitive advantage.

For the purposes of this comparison, we assessed the timeframes associated with an application by a US or British citizen¹⁶ for a two-year Intra-company Transfer visa¹⁷.

For this type of application, many jurisdictions have adopted a two-part process whereby the authorities initially assess a 'work permit' application before the applicant submits a visa application to the local embassy in their country of residence. While the UK's system still theoretically consists of two parts, the 'work permit' was replaced by a certificate of sponsorship (CoS) when the PBS was introduced, which an employer can issue within an hour or two, rather than needing to wait for the UK authorities to approve it.

This comparison of approximate processing times illustrates that the UK offers one of the shortest timeframes for obtaining an Intra-company Transfer visa.

Perception as to whether the system is fast or slow often depends on how long each part of the process takes and how each part of the process impacts on the employer and applicant. In the UK, an employer might appreciate the ability to assign a certificate of sponsorship (CoS) quickly, whereas their employee might find having to give up their passport for three weeks disproportionately slow, especially if they are a frequent business traveller. By comparison, an employer in Ireland might find the process frustratingly slow while they wait for a work permit to be issued through the Irish authorities. However, after that point, the applicant can travel to Ireland and then acquire their residence permit on a same-day basis¹⁸, and may therefore report that the process is fast.

Recognising the importance of considering each stage of the visa process, our recommendations for the UK's system focus on streamlining the visa application experience for the applicant, including:

- The facility for employers holding an A-rated sponsor licence to certify the English language ability of the applicant on their CoS, eliminating the need for English language tests and UKNARIC (the UK's national agency for the recognition and comparison of international qualifications and skills) certifications.

- Enhanced visibility of live processing times so visa applicants can view reliable information on how long their application will take and the current status of their application, in much the same way as tracking technology is used for other non-immigration purposes.
- An improved error handling and complaints system with a 48-hour service level agreement that dedicates additional UKVI resources to facilitate the prompt resolution of errors by UKVI or third-party service providers and minimise the impact of these mistakes on applicants and their employers.

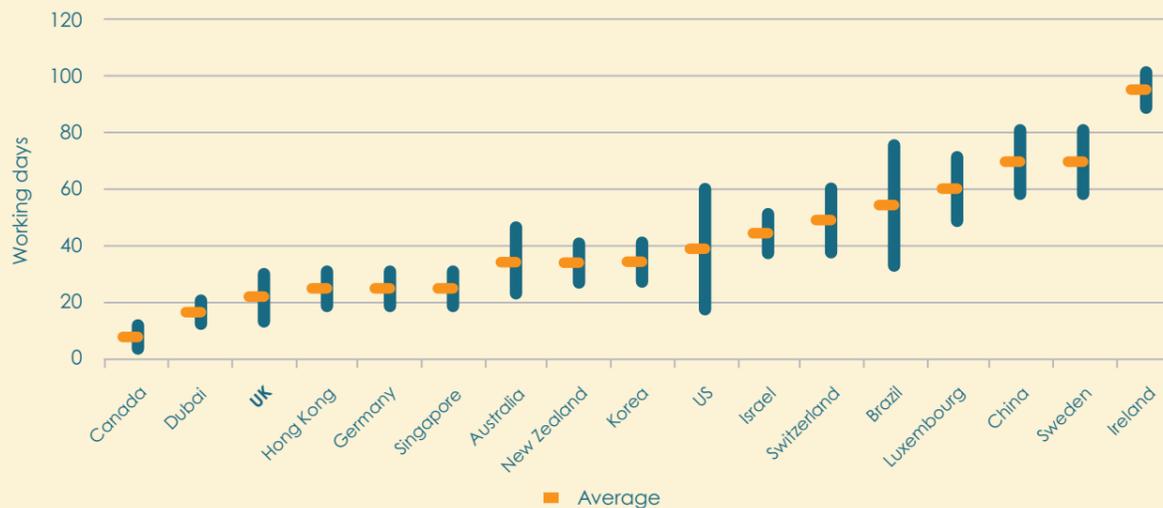
Comparing immigration systems: cost

Respondents were keen to stress the importance of having a visa application system that supports their business objectives. Costs, both in overall and relative terms, played a key part in this consideration. If the cost of bringing overseas talent to the UK to fill a skills gap or to train up local workers is too high, the organisation may leave the post unfilled or move it to an overseas office.

For the purposes of this comparison, we assessed total costs associated with an application by a US or British citizen¹⁹ for a two-year Intra-company Transfer visa.

Comparison of approximate visa processing times in a selection of comparable jurisdictions

Source: EY research



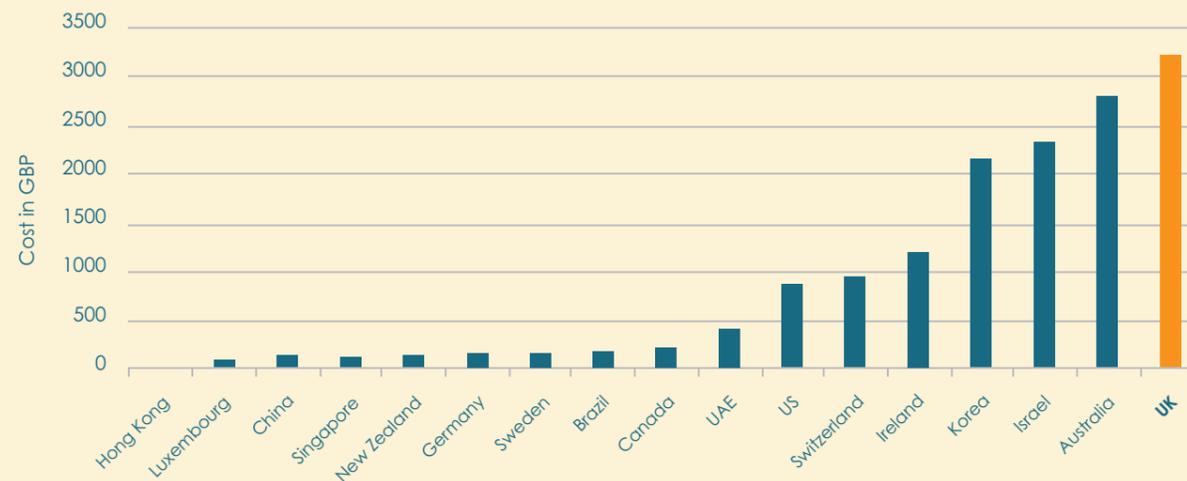
Approximate timeframes based on user experience of processing times from the start of the process to work start date for a two-year Intra-company Transfer visa. For the sake of clarity, priority or preferential service routes have not been included – not all countries offer these services.

¹⁶ We assessed speed on the basis of a US citizen travelling to all countries other than the US, and a British citizen travelling to the US
¹⁷ In broad terms, an applicant would qualify for this type of visa by virtue of being transferred to the local branch of their employer having worked for the same company overseas for at least a year or two

¹⁸ Where the applicant is a 'non visa national', e.g. a US citizen
¹⁹ We assessed cost on the basis of a US citizen travelling to all countries other than the US and New Zealand, and a British citizen travelling to the US and New Zealand – New Zealand does not charge fees to US applicants under a bilateral agreement

Comparison of total visa application costs in a selection of comparable jurisdictions

Source: EY research



Total visa application fees for a two-year Intra-company Transfer visa, converted to GBP on 21 October 2018. For the sake of clarity, priority or preferential service routes have not been included – not all countries offer these services.

Visa application costs are often highlighted by employers and applicants as being high in the UK and from our international comparison, this perception is clearly correct. Viewed separately, the fee to sponsor an employee within the Tier 2 route (£199) and the visa application fee for a Tier 2 (Intra-company Transfer) visa (£610) compare well internationally.

However, it is the inclusion of additional fees which result in the UK having the most expensive system we have reviewed. For example, funds raised by the immigration health surcharge (IHS) go to the NHS and funds raised by the immigration skills charge (ISC) predominantly go to central Government, albeit they are notionally earmarked to support the upskilling of local workers. Without these additional fees, the UK's system would sit between the US (approximately £850) and Ireland (approximately £1,200).

| Fees for a two-year Tier 2 (ICT) visa | |
|---------------------------------------|---------------|
| Certificate of sponsorship | £199 |
| Immigration skills charge | £2,000 |
| Entry clearance | £610 |
| Immigration health surcharge | £400 |
| Total | £3,209 |

At the time of writing, the Independent Chief Inspector of Borders and Immigration has begun work on a review of the Home Office's visa charges. The inspection will look at the rationale and authority for particular charges, including the amounts charged. It will also look at whether the Home Office is providing the services in question efficiently and effectively, including meeting agreed service levels where these exist, and at the means of redress where individuals are dissatisfied with the service they have received. In addition, the MAC has recently recommended a full review of the operation of the immigration skills charge.

Given the high comparative cost of a Tier 2 visa, we are recommending the streamlining of various process steps, which will save considerable time and effort for all stakeholders involved in an application – employers, applicants, UKVI and the police. These process improvements should enable UKVI to make significant cost savings, which can be passed to system users and/or otherwise invested in further improvements. Relevant recommendations include:

- Elimination of the requirement for applicants of certain nationalities to register with the police – an outdated and redundant obligation, which would liberate both police and applicant time.
- A digital immigration status, with no requirement for UKVI to produce visa vignettes or BRPs.

- Removing the need for further leave to remain applications for simple visa extensions inside the UK.

Comparing immigration systems: convenience

In considering the attractiveness of a visa application system, respondents pointed to additional factors that had an impact on the relative convenience or inconvenience associated with applying for a visa. Whether or not the applicant is required to relinquish their passport, thus sacrificing their ability to travel whilst their passport is held by the embassy or visa application centre, was highlighted as a key consideration. Similarly, respondents welcomed the option to expedite or prioritise a visa application for additional fees where necessary.

| Countries not requiring an individual to relinquish their original passport | Countries requiring original passport and average time a passport will remain with the authorities |
|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Hong Kong | China 10 days |
| New Zealand | Brazil 10 days |
| Canada | US 4 days |
| Sweden | Korea 5 days |
| Ireland | Israel 2 days |
| UAE | UK 10 days |
| Germany | Switzerland 5 days |
| Australia | |
| Singapore | |
| Luxembourg | |

Case study: Do new IT systems help?

The implementation of new technology systems is often associated with progression towards an immigration scheme that is more helpful, efficient and predictable. Our research on other countries' immigration systems found that this perception is not always accurate in practice.

In Brazil, the online processing system does not require the submission of original documentation at the point of application and approval, although original documents are shown at a later verification stage. Despite simplifying the process for applicants, the system is reported to frequently suffer from technical issues, resulting in significant downtime, sometimes for several weeks. This results in delays to the overall process whilst applications are put on hold.

Singapore is also often set apart as having an exemplary and cutting edge online system. Even so, the country's reliance on technology has also been reported to be fallible. Users reported that the system was often subject to slow-downs at certain times and frequently encountered technical issues on busy days, raising concerns as to whether it could handle larger application volumes.

In contrast, Germany does not have a particularly high-tech application system, instead relying on paper forms and

frequent interaction between applicants, representatives and caseworkers. While there is no simplified online system, this also means that there is no reliance on complex back-end technology. This allows representatives to advise much more reliably on processing times and likely outcomes based on their high levels of access to caseworkers.

The UK's immigration system has, for many years, been moving away from the application process operated by Germany, and towards the process operated by Singapore, with less reliance on caseworkers and interaction with applicants, and more reliance on automated systems. It should be noted that although there are occasional technology issues with the UKVI's current application systems, the move to include newly developed systems within the Gov.UK technology environment has been, and continues to be, positive. Respondent feedback on the EU Settlement Scheme and online application system for renewing a British passport, both of which use Gov.UK technology, has been overwhelmingly positive. Respondents were keen to recognise the Home Office's success in developing these systems to be truly user-friendly and were keen that UKVI builds on this groundwork when designing new immigration systems.

Of the countries in our report sample, the UK is now in the minority in requiring applicants to relinquish their passport when submitting a visa application. It should be noted that the UK does offer a priority service for an additional fee that enables applicants to retain their passport for some of the processing period, although they are still required to submit their passport for a visa vignette to be affixed – this often takes three to five working days.

In comparing the availability of optional services to prioritise or expedite a visa application, the UK is unusual in offering a significant range of priority services, albeit for an additional fee. Corporate and individual respondents commented that they appreciated the availability of these services in relation to UK visa applications, and were willing to accept the additional cost where the service represented good 'value for money'.

This dynamic is important – if the standard service is sufficiently rapid, many would argue that priority services should be unnecessary. That being said, four of the five jurisdictions that do not offer optional priority services have standard processing times that are still slower than the UK's standard processing times.

Convenience is a key component of the attractiveness of the UK's visa application system and we have formulated our recommendations with this in mind:

- Increased visibility, reliability and accountability in relation to visa application processing times – particularly where the applicant has purchased a priority service to expedite the processing of their application.
- The implementation of a digital immigration status – removing the need for visa applicants to surrender their passport for an uncertain period during which they are unable to travel.

Comparing immigration systems: technology

One of the key factors often referenced in assessing the comparative merits of a jurisdiction's immigration system is the modernity of the technology used. As discussed elsewhere in this report, technological improvements can in principle increase speeds, cut costs and improve access to services, but this perception often changes with the day-to-day use of the system itself.

There is no direct method by which the effectiveness of technology systems can be compared internationally, other than by assessment of outputs including those described above – speed, cost and convenience. Nonetheless, there are key areas where technological upgrades will enable the UK's system to achieve the objectives outlined at the start of this report. Our recommendations in this area include:

- Enhanced and automatic visibility of live processing times at the point of application for a visa.
- The implementation of a digital immigration status, enabling electronic right to work checks and removal of the need for further leave to remain applications for simple visa extensions inside the UK.
- Enhanced reporting and notification functionality within the sponsor management system to streamline use of the system for all, but especially large employers.
- A more flexible payment system for all sponsors, with the option for employers and applicants to make payment for all relevant fees at one time rather than requiring multiple repetitive payments.

Our recommendations

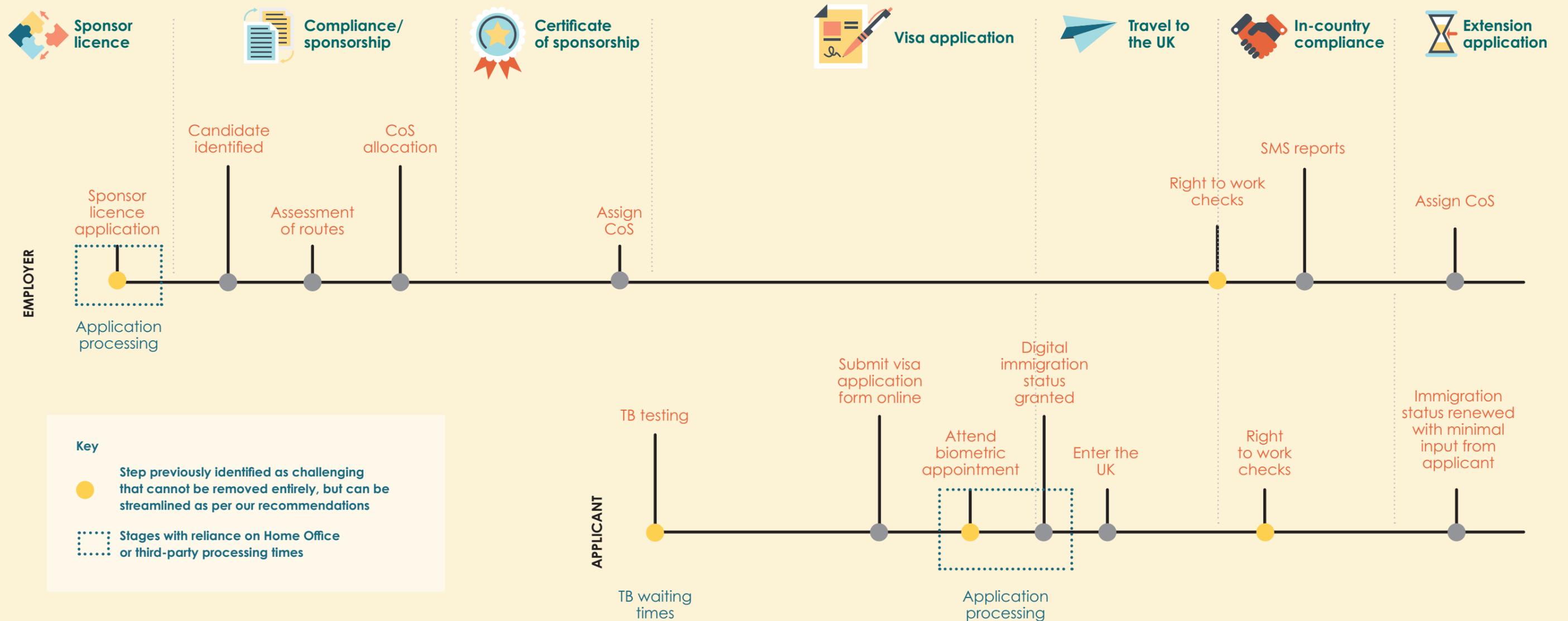
Overview of key challenges and how our recommendations benefit users

| Challenge, as reported by respondents | |
|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  Reuse of data | <p>Visa applicants need to provide the same biographic information up to four or five times throughout their stay in the UK – very little data is reused appropriately.</p> |
|  Sponsor licence | <p>The process of applying for a sponsor licence is 'intimidating' for new sponsors, with over 300 pages of guidance and the prospect of having to submit multiple applications to learn through trial and error how to apply successfully.</p> |
|  Visa application process | <p>Visa processing times are highly unpredictable and unreliable, with applicants needing to surrender their passport, preventing travel whilst the application is being processed.</p> |
|  Sponsor management system | <p>The sponsor management system is seen as outdated and unwieldy for employers that sponsor a large number of visa holders.</p> |
|  Police registration | <p>Visa holders view the requirement to register with the police to be outdated and redundant as they already provide the same information directly to UKVI.</p> |
|  English language testing | <p>Visa applicants are often required to sit a time-consuming and expensive English language test when they speak fluent English.</p> |

| Our recommendations | Impact |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Ensure secure and efficient reuse of data already held by UKVI so that applicants do not need to continually re-enter the same information.</p> <p>Eliminate the need for applicants to submit visa extension applications in the UK, with their digital immigration status being updated dynamically by their sponsor.</p> | <p>Visa holders and applicants will save significant time when applying for visas for their family members and when extending their visa, and will have an increased confidence in the UK's immigration system.</p> <p>Additional time will be saved by UKVI not needing to re-enter and re-assess information they already hold.</p> |
| <p>Implement a dedicated outreach programme operated by UKVI, targeted at SMEs and the particular challenges they face, whether they are overseas or home-based start-ups or are facing the need to apply for a new sponsor licence post-Brexit to sponsor EEA and Swiss workers.</p> | <p>A simplified process that saves significant time for SMEs and start-ups, enabling them to obtain a sponsor licence without the need for repeat applications.</p> |
| <p>Provide visibility of live processing times so visa applicants can view reliable information on how long their application will take and the current status of their application.</p> <p>Implement a digital immigration status, enabling ongoing travel whilst visa applications are being decided by avoiding the need for applicants to surrender their original passport.</p> | <p>Employers and visa applicants will be able to plan moves to the UK with a higher degree of certainty, resulting in more effective use of resources and avoiding the adverse commercial impact associated with delayed travel.</p> |
| <p>Offer reporting and notification functionality within the sponsor management system to streamline use of the system for all, but especially employers who issue larger numbers of CoS.</p> | <p>A more efficient system of sponsorship for employers who frequently sponsor overseas talent, reducing administrative burden and increasing employer confidence in the UK's immigration system.</p> |
| <p>Remove the police registration requirement, as UKVI already captures and holds the same information from visa holders.</p> | <p>Significant time saved for visa applicants and the police, with no reduction in the amount of information held by UKVI and no increased security concerns.</p> |
| <p>Allow employers holding an A-rated sponsor licence to certify the English language ability of candidates, avoiding the need for a test.</p> | <p>A streamlined visa application process that can reduce the time associated with obtaining a visa by several weeks.</p> |

A world-class visa application system

Processes associated with a typical Tier 2 (General) visa application post recommendation implementation



N.B. The above also assumes recent recommendations by the Migration Advisory Committee are adopted in full

Acronyms

CoS/RCoS – Certificate of sponsorship/Restricted certificate of sponsorship

RLMT – Resident labour market test

SMS – Sponsor management system

TB – Tuberculosis

ELT – English language testing

The UK's current immigration policy environment

The operation of the UK's immigration system is underpinned by a complex set of policy objectives which aim to reduce net migration while supporting certain categories of immigration that are seen as being in the economic interests of the country or which fulfil humanitarian aims. Many of these policy objectives are currently in a state of flux, largely due to the UK's impending departure from the EU and the end of freedom of movement.

In October 2018, Prime Minister Theresa May announced that the Government would adopt the Migration Advisory Committee's core recommendation that post-Brexit, the UK's immigration system should discriminate on the basis of skills, rather than nationality. On this basis, from 2021²⁰, EEA and Swiss nationals arriving in the UK will probably need a suitable visa to enable them to work here and will, in all likelihood, be added to the number of non-EEA candidates currently grappling with the UK's immigration system.

A re-examination of immigration policy objectives has been the subject of several notable papers over the last few years. However, for the reasons highlighted – and not least the additional numbers of applicants our system may be about to serve – it is imperative that focus also falls on the intricate set of operational procedures that applicants and their employers must undertake to obtain a visa for the UK. Many respondents pointed to the cumulative effect of inefficiencies, frustrations and delays.

When considered as a whole, these challenges take up many days of both the employers' and applicants' time – and have become a significant consideration in resource and productivity planning. This is time and effort that could be better spent generating economic growth in the UK.

Many of our recommendations below concern disparate parts of the visa application process. However, just as the cumulative impact of frustrations with current processes can be significant, the positive impact of a future streamlined system will be critical for the UK. This promises to generate value for business, delivering a positive personal experience for applicants and driving competitive advantage for the country.

The foundations for an improved system

It should be recognised that UKVI has, over the last few years, made concerted efforts to become more customer focused. Many respondents highlighted the increasing availability of optional priority services as a positive development, although this was regularly balanced with the view that reliability is key. In the majority of cases, employers commented that they would rather have a slightly longer but guaranteed processing time than an unpredictable, but occasionally shorter, process.

Similarly, respondents who had attended a demonstration of the application process associated with the EU Settlement Scheme (opening in March 2019) were in agreement that this represented a positive and important step forward.

The application process is designed to be straightforward and user-friendly and utilises data already held by HMRC and DWP to enable algorithms to assess automatically an applicant's eligibility for settled status. UKVI caseworkers are encouraged to contact applicants promptly and work with them to obtain missing information and documentation, rather than rejecting an application. Respondents were hopeful that systems created for this new application process could be applied to points-based system applicants in the near future.

In engaging with senior UKVI stakeholders, it is apparent that they seek an effective, ongoing dialogue with users of the system and are eager to improve the UK's visa application processes.

We recognise that some of the improvements we propose will require time and financial resources to implement, either because they require changes to primary legislation, or because they involve the development of new IT systems or modification of existing ones – but some are quick wins for UK business and applicants. With this in mind, we have also outlined a proposed timeline for each of our recommendations.

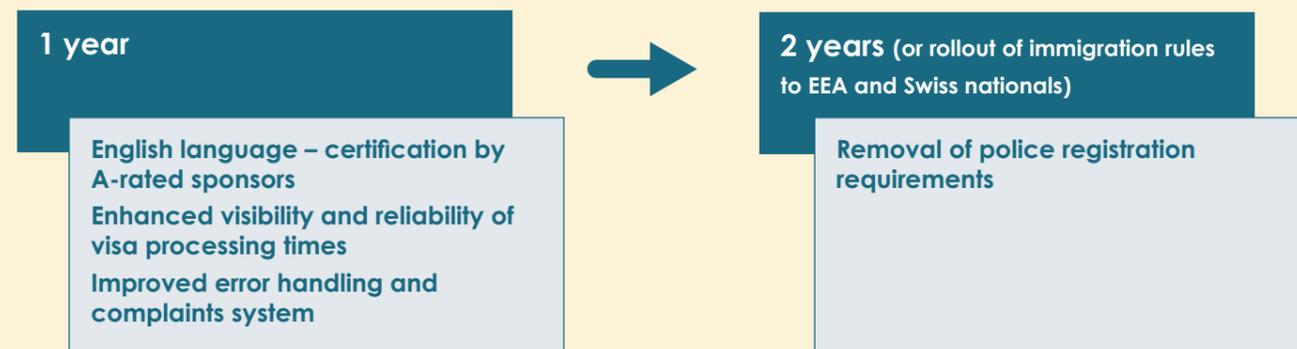
²⁰ European Commission, 'Draft Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community', (March 2018), available at: https://ec.europa.eu/commission/sites/beta-political/files/draft_agreement_coloured.pdf

Recommendation 1 – Reduce the administrative burden and uncertainty associated with visa applications

We recommend a substantial reduction and reconfiguration of administratively burdensome process steps associated with the UK visa application system including:

- The facility for employers holding an A-rated sponsor licence to certify the English language ability of the applicant on their certificate of sponsorship (CoS), eliminating the need for English language tests and UKNARIC certifications.

- Enhanced visibility of live processing times at the point of application for a visa, so visa applicants can view reliable information on how long their application will take and the current status of their application, in much the same way as tracking technology is used for other non-immigration purposes.
- An improved error handling and complaints system to facilitate the prompt resolution of errors by UKVI or third-party service providers.
- Elimination of the requirement for applicants of certain nationalities to register with the police – an outdated and redundant obligation which would liberate both police and applicant time.



Implementation and rationale

English language certification by sponsors

Respondents reported that applicants frequently find the process of demonstrating that they meet the English language requirement overly burdensome. This is often due to poor availability of English language test appointments or the timeframes and documentary requirements associated with utilising UKNARIC. These administrative steps often add up to four weeks to a typical visa application.

Our solution is to offer Tier 2 sponsors the option of certifying that the applicant can speak English to B1 standard on the applicant's CoS, where the company holds an A-rated sponsor licence. Whether the applicant is already employed by the sponsor in the UK or overseas, or is a new hire coming for interview, it will be relatively straightforward for the sponsor to determine that the applicant can communicate in English at an intermediate level²¹. In borderline cases, sponsors will still have the option of asking the applicant to provide relevant documentation. Compliance can be monitored as part of the UKVI audit system.

The sponsorship system – balancing 'up front' control with the retrospective monitoring of compliance

Tier 2 (skilled workers), Tier 4 (students) and Tier 5 (temporary workers) of the PBS operate via a sponsorship system. The 'quid pro quo' is that by agreeing to comply with a set of sponsor duties, sponsors, including employers, are able to benefit from a simpler process for each application to sponsor a non-EEA national. For example, prior to the introduction of the PBS, employers were required to apply for a work permit, which might have taken the Home Office six weeks to grant. Under the PBS, sponsors can now assign a CoS, which is equivalent to a work permit under the old system, within an hour or two. Compliance is monitored by UKVI retrospectively, with significant penalties for those found to be abusing the system.

Our recommendations, particularly the proposal to allow sponsors to certify an applicant's English language ability, open up the question of how UKVI should balance up-front control, which is often inefficient and time-consuming for all parties, with the retrospective monitoring of compliance. The complete elimination of either of these methods of control is beyond the scope of this report, but it was apparent from our research that respondents were keen for the precise balance to be re-examined. Whilst not universal amongst respondents, there was a frequently voiced suggestion, particularly from frequent users, that they would prefer a system that offers A-rated sponsors a light touch visa application process in return for a more frequent, and perhaps predictable, framework for UKVI compliance audits.

²¹ Level B1 of the Common European Framework of Reference for Languages (CEFR)

Enhanced visibility and reliability of visa processing times

Respondents reported that even where they or their staff had paid hundreds or thousands of pounds in additional fees to expedite a visa application, UKVI processing times were often unreliable, and that there is no accountability when these timeframes are exceeded. The fact that applicants must submit their passport for at least part of this process, and so are unable to undertake any critical business or personal travel, exacerbates this challenge.

Case study: Visa application updates

Rather than caseworkers providing direct updates to applicants, the Irish visa application system operates by way of a queue mechanism which provides up-to-date information on where applications are in the queue. The Department of Business Enterprise and Innovation posts the date of work permit applications currently being considered. While this system does not provide the exact date as to when a decision will be made, it does provide reassurance for applicants as to where their application might be in the queue and assists immigration providers with monitoring the progress of applications generally.

We recommend a system that shows current live processing times to applicants at the point of application so they can plan their international travel and start date accordingly. Respondents recognised that it would not always be possible for UKVI to guarantee these timeframes. However, they ask for greater sense of urgency when standard timeframes have been exceeded, including clear communication with the applicant on the reason for the exception.

An improved error handling and complaints system

Respondents commented that when errors were made by UKVI or their outsourced third-party service providers²², there appeared to be little urgency associated with the matter being rectified. UKVI's service standard for responding to complaints is four weeks. Where, for example, UKVI has included incorrect dates on a visa – an issue that prevents the visa holder from travelling to the UK – they are forced to wait for a response, potentially missing many weeks of work or study.

We suggest the implementation of an improved error handling and complaints system that dedicates additional UKVI resources to create a new, user-focused approach, ensuring the visa application process can run efficiently, even when things go wrong. UKVI staff should receive additional training to enable them to rapidly identify whether UKVI or an outsourced third-party service provider is at fault, accept the error and rectify the matter as quickly as possible. For simple, objectively clear errors, such as misprinted information, delayed document dispatch or misplaced documents, the service standard for rectifying the error should be 48-hours, not four weeks.

Case study: Rectifying errors

The Hong Kong Immigration Department allocates case numbers to applications, enabling representatives to resolve challenges directly with a specific caseworker and any document issues or processing problems to be rectified directly.

Similarly, the accessibility of the German system allows representatives to build relationships with decision-making teams, promoting two-way dialogue where mistakes are made or where information is unclear. Refusals, in the sense that we understand them in the UK, are rarely an issue as representatives work together with decision-makers to facilitate the expected outcome.

The decision-making approach in Canada is similar, and businesses generally have a high degree of confidence in the decision-making process. Officials may reach out to businesses to confirm certain details wherever there has been an apparent oversight, rather than refusing the application.

While each of the processes above do not necessarily eliminate all mistakes made in the decision-making process, they do allow for a greater confidence in the system due to a more practical and collaborative approach.

Removal of the police registration requirement

Respondents raised concerns that the requirement, which was first introduced in 1914 and requires visa holders of certain nationalities to notify local police of changes to their address and marital status, is now severely outdated and appears to serve no practical function. All holders of BRPs are already required to notify UKVI directly when their personal details or address change and are able to do so electronically and without taking up the police's valuable time.

We propose that the police registration system be removed entirely, as UKVI already captures and holds the same dataset. Methods for ensuring national security have moved beyond asking foreign nationals to self-report changes of status at their local police station.

Recommendation 2 – Create a digital immigration status

We recommend the move to an entirely digital immigration status, thus eliminating physical visa vignettes and BRPs. As implemented in other countries, a digital immigration status is a secure 'log' of the individual's current and past immigration status, tied to their passport number and biometric information²³. This change would facilitate the following benefits for applicants and their employers:

- Removing the need for visa applicants to surrender their passport for an uncertain period during which they are unable to travel.
- Offering increased security and reduced confusion for employers through the use of electronic right to work checks.
- Reducing the considerable business and personal challenges associated with loss or delayed delivery of BRPs.



Case study: Electronic visa system

Australia's visa system has a large range of different visa categories with 22 subclasses for work and skilled visas. This can make the customer experience confusing and future reform may point to reducing the number of categories. However, in terms of usability at the point of access, users point to a relatively sophisticated electronic visa system that works well and eliminates the need to provide original hard-copy documents. While visas are linked electronically to passports, they need not be attached to them physically. This reduces the number of touch points in the application process and helps streamline the overall customer experience.

Implementation and rationale

Respondents highlighted numerous challenges associated with physical immigration documents, including:

- Delays in the production and collection of visa vignettes and BRPs, frustrating travel and delaying the applicant's start date.
- The obligation on employers to check a candidate's right to work in the UK effectively requires the employer to have an in-depth understanding of the immigration system and the significance of brief remarks printed on a vignette or BRP to avoid unwittingly employing a migrant worker illegally.
- Acute difficulties faced by visa holders who have their BRP stolen whilst abroad. Victims of such crimes are often required to wait for many weeks in a country they may have only visited briefly while a new visa vignette is printed and affixed to their passport.

The implementation of a digital immigration status will eliminate the business and personal challenges identified above. Applicants will no longer need to surrender their passport so that a visa vignette can be affixed, enabling them to undertake business travel while their visa application is pending. A digital status can be readily checked at the UK border, so the complications associated with a visa holder having their BRP stolen are removed. Digital status will also enable an online system for verifying their right to work, clearly outlining the work the visa holder is allowed to do and helping employers make correct decisions on matters of compliance, reducing instances of unintended illegal working.

In addition to the practical benefits outlined above, digital status is less susceptible to forgeries and thus inherently more secure.

Progress so far:

- UKVI has been developing a new technology system to facilitate an electronic immigration status for EU citizens who register their status in the UK under the EU Settlement Scheme from March 2019.
- The Government has introduced legislation to facilitate the future implementation of electronic visa vignettes for non-EEA citizens.
- UKVI has implemented functionality to enable employers to perform a digital check on a BRP to verify the type of work the holder may undertake. However the system does not provide a statutory defence to employers who unknowingly hire an illegal migrant and in its present form is therefore duplicative.

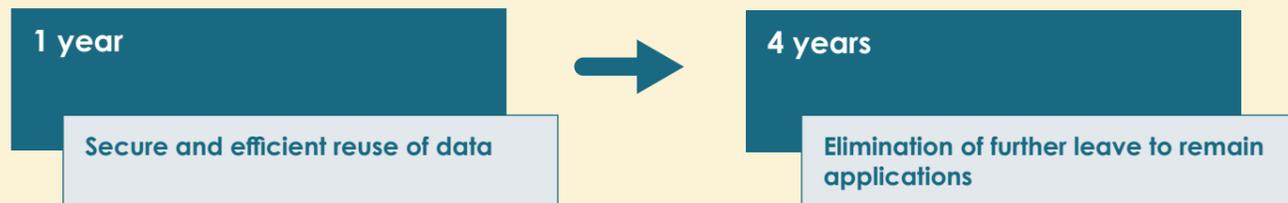
Our proposal draws on the progress already made within UKVI in developing new electronic systems but does not stop there. For applicants, visa holders and employers to benefit fully from the efficiencies outlined above, we must ensure that we work towards a wholly digital immigration status, rather than accept a system that relies partly on physical status documents and partly on digital status.

23 The UK's immigration system currently uses digital fingerprints and a photo to identify applicants

Recommendation 3 – Avoid duplicative process steps when extending a visa

We recommend the simplification and eventual elimination of applications to extend a visa in the UK in visa categories that involve a sponsor, e.g. Tiers 2, 4 and 5:

- With the implementation of a digital immigration status, sponsors including employers and universities should be able to extend an individual's immigration status digitally via their sponsorship management system rather than completing a superfluous further leave to remain application.
- In the interim period, personal data held by UKVI should be securely and efficiently reused to populate application forms on extension to avoid unnecessary re-entry by the applicant.



Case study: Extension applications

Tier 2 of the PBS does not impose a policy-based requirement on employers and their staff to extend their visa after three-years in the UK. Instead, the decision of whether to apply for a three-year visa or a five-year visa rests solely with the employer. This is often dictated by the employer weighing up the additional cost of a five-year visa against the possibility the visa holder may leave their employment during the first three-years, as well as the length of time the applicant is required to remain in the UK.

Where a Tier 2 visa holder needs to extend their status after three-years, although the primary requirement is that the employer assigns a new CoS, the visa holder is still required to undertake an administratively burdensome, duplicative and stressful formal extension process known as further leave to remain. This involves the visa holder and their family filling out multiple forms and then waiting for a decision for up to 12 weeks.

Implementation and rationale

Respondents told us that the in-country extension process was typically less onerous and prone to delays than the process of submitting a visa application outside of the UK. Nonetheless, the question was asked – if the only difference between a three-year visa application and a five-year application is the employment period specified on the CoS, why can't we extend our employee's immigration status simply by assigning a new CoS after three-years?

The answer is that there doesn't appear to be any real policy-based reason why employers should not be able to extend a Tier 2 visa simply by assigning a new CoS and paying the relevant fees. In practice, an application is needed under the current system because UKVI must print a new BRP once the extension has been granted.

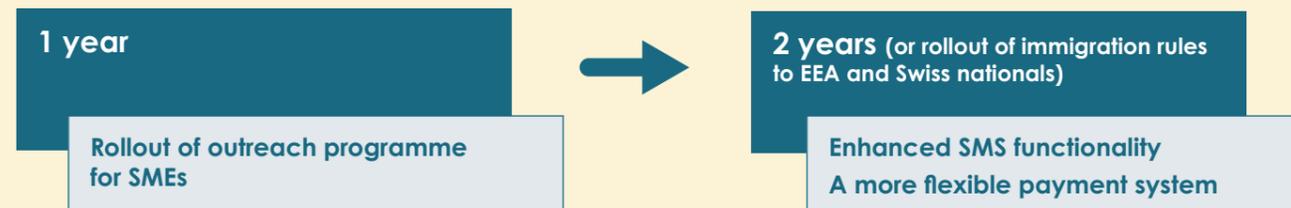
We recommend that with the elimination of physical immigration documents (including BRPs) outlined in recommendation 3, administratively burdensome extension applications also be eliminated. Instead, the process of extending a Tier 2 visa holder's digital immigration status should merely involve the employer assigning a new CoS. We envisage the data contained on the CoS would then be automatically validated via simple algorithms before automatically extending the visa holder's digital immigration status without any need to submit original documents or biometrics or go to a visa application centre. This improvement would save significant amounts of time for employers, applicants and UKVI, who would no longer need to process extension application forms.

We acknowledge that the implementation of the system described above will take some time. By way of an intermediate step, we would recommend the streamlining of the extension process. One simple way of doing this would be to implement the secure and efficient reuse of data provided by the applicant when they submitted their first visa application. Instead of requiring the applicant to re-enter basic personal and family biographical information each time they extend their visa, a secure 'identity' tied to the applicant's passport and email address will enable the automatic population of application forms. The applicant would simply be asked to confirm that nothing has changed. This technology can also be deployed in cases where a new formal application will always be required, for example when applying for indefinite leave to remain.

Recommendation 4 – Provide tailored support to employers sponsors of different sizes and in different sectors to encourage investment and growth in the UK

We recommend a number of changes to the sponsor licensing system to offer enhanced support to sponsors of different sizes and sectors, including:

- A dedicated outreach programme, targeted at SMEs and the particular challenges they face, whether they are overseas or home-based start-ups or are facing the need to apply for a new sponsor licence post-Brexit to sponsor EEA and Swiss workers.
- Enhanced reporting and notification functionality within the SMS to streamline use of the system for all, but especially employers who issue larger numbers of CoS.
- A more flexible payment system for all sponsors, with the option for employers and applicants to make payment for all relevant fees at one time rather than requiring multiple repetitive payments.



Case study: Access to decision-makers

One of the challenges policy-makers face when trying to improve an immigration system is in attempting to balance certainty with flexibility. The German immigration system manages this by offering a high level of access to decision-makers – corporate users can discuss specific scenarios and cases directly with the Labour Department and receive assurance that they are acting compliantly. This common sense approach avoids applications being refused purely because of simple errors in filing, scanning or decision-making.

Implementation and rationale

Outreach programme for SMEs

Respondents told us that the process of applying for a sponsor licence is a significant hurdle for SMEs, whether they are long established UK-based companies that have never needed to sponsor a migrant worker before, start-ups or new UK branches of overseas companies. These organisations often have neither dedicated HR functions nor in-house UK immigration specialists. Therefore the significant administrative overhead and compliance risk associated with understanding the 300 pages of guidance associated with becoming a sponsor and applying for visas²⁴ is of considerable concern – often falling at a time when other aspects of establishing a new corporate presence or business development is a priority.

We therefore recommend, that in the run-up to 2021 and beyond, UKVI offer an enhanced level of support to SMEs looking to apply for a sponsor licence for the first time. The Home Office has recently begun to deliver a highly effective outreach programme in relation to the EU Settlement Scheme. This creates an opportunity for communications to be extended to cover employers who will be prompted to apply for a new sponsor licence to sponsor EEA and Swiss workers after the end of freedom of movement. We anticipate this programme could include:

- Concise, sector-specific guidance on Tier 2 eligibility, combined with a simple online 'calculator' through which employers can determine whether a role meets skill and salary thresholds.
- A relaxation of the strict system whereby applications for a sponsor licence are rejected purely because of missing documentation. UKVI should instead review records held by other Government bodies, including HMRC, as well as public records before doubting whether the applicant is a genuine business.
- A temporary easing of the implicit requirement that an employer must have a pressing need to sponsor a migrant worker in order to apply for a sponsor licence. If employers must wait until they have an imminent need, this is likely to create a significant rush of applications in early 2021. Instead, employers should be encouraged to apply sooner rather than later to regulate the volume of applications UKVI must process, with the four-year validity of their sponsor licence only commencing once they sponsor their first migrant worker.

²⁴ UKVI, 'Sponsorship: guidance for employers and educators', (July 2018), available at: <http://www.gov.uk/government/collections/sponsorship-information-for-employers-and-educators>

Conclusion

Enhanced SMS functionality

Corporate respondents who are frequent users of Tier 2 reported that the SMS is inefficient, particularly in relation to:

- Submitting notifications of minor changes to work details, including increases to salary and changes to work address. Respondents suggested that it should be possible to upload 'bulk' notifications, either in spreadsheet format or via a secure API²⁵ which would enable integration with employers' own systems.
- Search and reporting features – similarly, employers often want to view this data holistically, rather than by searching for one individual, downloading the data and then searching for the next individual. Respondents requested the functionality to be able to run advanced reports, either within the SMS or via an API.

Our proposal is that the feature set identified above be implemented within the SMS, saving a significant amount of time for all – but particularly corporates with larger sponsored populations.

A more flexible payment system

A typical visa application involves four separate credit or debit card payments for the main applicant and an additional two such payments for each dependent family

member. In certain cases, additional payment must be made in cash at the visa application centre. With the exception of the immigration skills charge, which must be paid by the employer, there are no rules on who, between the applicant and their employer, must bear the financial burden associated with these payments.

However, logistically, some of these payments can only be made by the employer, and some can only be made by the applicant. Respondents told us that this creates a complex system whereby on some occasions, applicants must claim back payments they made through their employer's expenses process. On other occasions, the employer claws back certain payments that they have made from the applicant through their payroll system.

We recommend a more flexible payment system that generates a unique payment ID code for each payment due. These payment ID codes can then be passed to whoever will bear the ultimate financial burden²⁶ so that relevant payments can be made without needing to claim the amount back from the other party. Employers will also benefit from being able to make payment 'runs' for multiple applications in one go, further reducing the associated administration.

To achieve the objective of developing a world-class visa process that supports the UK economy in continuing to grow over the next five-years and beyond, it will be crucial to build on recent progress. We have developed our recommendations to help prioritise improvements that will have the largest possible positive impact for current UK employers, their employees and overseas corporates wishing to expand and invest here in the future.

Our recommendations, when fully implemented, will bring about the following benefits:

For visa applicants and visa holders:

- A faster, more reliable visa application process that supports applicants in planning their move to the UK without having to juggle uncertain and complex processes.
- An end to the reliance on physical immigration documents (e.g. visas, BRPs) that can be lost, and the requirement for applicants to surrender their passport for several weeks.
- Reduced administrative burden and touch points with UKVI by virtue of more effective use of data already provided by visa applicants, including ending the requirement to visit a police station to register changes to address.

For employers:

- The ability to plan more reliably international assignments to the UK and new hires, with increased certainty as to when a candidate can commence their role in the UK.

- A more efficient sponsor process underpinned by an enhanced sponsor management system, reducing internal or outsourced costs associated with sponsoring visa applicants.
- A simpler and more flexible process for SMEs and start-ups in applying for a sponsor licence, with increased support from UKVI, freeing up resources to focus on establishing a new corporate presence or business development.

For UKVI and wider government:

- Increased confidence in the UK's immigration system as a mechanism for supporting the UK's economic goals, as well as controlling immigration – creating wider benefits for society.
- A significant reduction in the amount of manual processing by UKVI staff when processing applications, including rechecking data already held by UKVI, allowing redeployment of staff to more strategically important tasks.
- An end to the police registration process, freeing up resources within the police force.

Looking forward, we welcome the opportunity for further engagement with UKVI on our recommendations, many of which are solely within the policy remit of UKVI to implement without requiring substantive legislation. The more ambitious recommendations, including the future vision of an entirely digital immigration status, will take time, changes to primary legislation and infrastructure development. That being said, these improvements will bring significant value to all stakeholders without compromising the ability to control immigration – now is the time to act, invest and create a world-class visa process for the UK, for the benefit of all.

²⁵ Application Programming Interface (API) – this functionality exists within other parts of the Gov.UK website, notably HMRC

²⁶ With the exception of payment for the immigration skills charge, which as per policy, must be made by the employer

Bibliography

BBC, 'Immigration points-based systems compared', (June 2016)

European Commission, 'Draft Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community', (March 2018)

EY, 'UK Attractiveness Survey', (June 2018)

HM Government, 'A Points-Based System: Making Migration Work for Britain', (March 2006)

HM Government, 'The future relationship between the United Kingdom and the European Union', (July 2018)

House of Commons, 'The UK's points-based system for immigration', (July 2018)

Migration Advisory Committee, 'EEA migration in the UK', (September 2018)

Office for National Statistics, 'Immigration Statistics', (August 2018)

Office for National Statistics, 'Labour Market Statistics', (October 2018)

Office for National Statistics, 'Long-Term International Migration', (August 2018)

The New York Times, 'What Can the U.S. Learn From How Other Countries Handle Immigration?', (February 2018)

UKVI, 'Sponsorship: guidance for employers and educators', (July 2018)

Glossary

Annual limit ('the cap')

Introduced in April 2011, there is an annual limit of 20,700 Tier 2 (General) certificates of sponsorship available to employers per year, primarily used to sponsor visas for new hires from outside of the UK. Intra-company Transfers and in-country extensions are excluded from this limit. Visas within this limit are allocated by UKVI to employers each month, and where that month's allocation is exceeded, applications are prioritised by a number of factors, including:

- Whether the role is on the Shortage Occupation List
- Whether the role is skilled to PhD level
- The salary (in absolute terms) of the role.

Where an application is refused because other applications have been prioritised, the employer can reapply the following month, but can have no confidence that their application will be granted, as reapplications are granted equal weight to new applications.

Between December 2017 and July 2018, the annual limit was heavily oversubscribed and many applications were rejected as a result. From July 2018, doctors and nurses were excluded from the limit, freeing up significant numbers of certificates of sponsorship for other applicants. From August to October 2018, the annual limit has been undersubscribed, meaning all valid applications have been approved.

The Migration Advisory Committee (MAC) has recommended the abolition of the annual limit as it creates uncertainty among employers.

Biometric residence permit (BRP)

This physical ID card acts as evidence of the holder's immigration status, or visa, in the UK. BRPs are produced inside the UK and, due to security concerns, UKVI will not courier BRPs overseas. Instead, candidates applying from outside of the UK are granted an initial 30-day visa vignette and then must collect their BRP from a nominated branch of the Post Office once they arrive in the UK. Applicants who extend their visa inside the UK are sent a new BRP confirming the validity of their extended visa, and their old BRP is retained and destroyed by UKVI.

Certificate of sponsorship (CoS)

For each non-EEA national they wish to sponsor, employers submit a form via the sponsor management system (SMS) containing information regarding the migrant and the job they will be performing in the UK, and pay the relevant fee by credit or debit card. This generates a certificate of sponsorship – an electronic document or database record that exists within the SMS. The applicant then includes the CoS's unique reference number on their application for a visa. This visa application typically has to be submitted outside the UK, in the applicant's usual country of residence.

The CoS is roughly equivalent to a work permit issued by the Home Office under the UK's immigration system pre-2008.

English language requirement

Non-EEA nationals applying for a visa under the Tier 2 (General) subcategory of the PBS must demonstrate that they can communicate in English at an intermediate level – B1 of the Common European Framework of Reference for Languages (CEFR). Unless the applicant is a national of a majority English language speaking country such as the US, Canada, and Australia, they generally need to take an approved English language test, which typically expires after two-years. Alternatively, they can apply to UKNARIC for confirmation that their degree is equivalent to a UK degree and was taught in English.

Visa/entry clearance application process

A visa /entry clearance application is the application process by which a non-EEA national who is outside of the UK applies for permission to enter the UK. The terms are broadly analogous depending on the nationality of the applicant – we have used the term 'visa' and 'visa application' in this report to cover both circumstances. This involves completing an online application form, booking an appointment at the nearest visa application centre and then attending in person with any family members who are also applying at the same time.

Applicants are generally required to submit original documentation including passports, bank statements, payslips and evidence of English language ability. The application is then decided, either locally or in the UK, and the decision and documents returned to the applicant. If the application has been successful, in most cases the applicant and their family members will receive visa vignettes in their passports with a validity of 30 days.

The applicant and their family members must then travel to the UK within those 30 days to 'activate' their visa status and collect their biometric residence permit (BRP), which evidences the full validity of the visa they have applied for.

EU/EEA/European nationals/citizens

The terms 'European' and 'EEA' are used to denote all countries in the EEA (the EU Member States together with Iceland, Liechtenstein and Norway) and Switzerland. The term 'EU' is used specifically to exclude citizens of Iceland, Liechtenstein, Norway and Switzerland, primarily in relation to the draft withdrawal agreement between the UK and EU. For the purposes of this report 'EU' also excludes those who hold UK citizenship.

Fees, including optional priority fees

The various costs associated with a visa application for the UK generally fit into one of the following categories:

- **Visa application fee** – this varies for different application types. For example, a visa for the spouse of a British citizen is significantly more expensive than a Tier 2 visa.
- **Certificate of sponsorship fee** – the fee associated with assigning a certificate of sponsorship via the sponsor management system – £199.
- **Immigration health surcharge** – introduced in 2015, funds raised by this fee are not retained by UKVI and are used to support the National Health Service – £200 per person per year for most applicants, payable in full at the point of application. This will increase to £400 per person per year from December 2018.

- **Immigration skills charge** – Introduced in 2017, funds raised by this fee are not retained by UKVI and go to central government, notionally to support training and upskilling local workers – £1,000 per person per year for Tier 2 applicants, payable in full at the point of application.
- **Optional priority fees** – UKVI and third-party service providers offer a range of optional priority services to expedite applications. Availability differs from location to location. Examples include:
 - Expediting visa/entry clearance applications to around five working days – £212
 - Expediting visa/entry clearance applications to 24-48 hours – £956
 - Expediting extension/further leave to remain applications to around 10 working days – £477
 - Expediting extension/further leave to remain applications to one working day – £610.

By way of an example, the costs associated with a two-year Tier 2 (Intra-company Transfer²⁷) visa application with two accompanying family members are as follows:

| | Main applicant | Per family member |
|--------------------------------------------------------|----------------|-------------------|
| Visa application fee | £610 | £610 |
| Certificate of sponsorship | £199 | - |
| Immigration health surcharge | £400 | £400 |
| Immigration skills charge | £2,000 | - |
| Priority fee | £212 | £212 |
| Total for main applicant and two family members | | £5,865 |

²⁷ In broad terms, an applicant would qualify for this type of visa by virtue of being transferred to the local branch of their employer having worked for the same company overseas for at least a year or two

Freedom of movement

One of the four fundamental freedoms of the EU, this concept permits EU, EEA and Swiss nationals to live and work freely in the UK with limited restrictions and vice versa. The Government has committed to ending freedom of movement as part of leaving the EU.

Migration Advisory Committee (MAC)

An independent, non-statutory, non-time limited, non-departmental public body that advises the Government on migration issues. The MAC is made up of a chairperson and three other independent economists. The Home Office is also represented on the committee.

Non-European/non-EEA nationals/citizens

Used to describe the group of overseas citizens who do not benefit from freedom of movement and are therefore currently subject to the requirement to obtain permission to live and work in the UK, e.g. a Tier 2 visa.

Payment system

With the exception of the immigration skills charge (ISC) which must be paid by the sponsor/employer, each of the fee payments associated with a visa application can be paid by any party, but are generally paid by either the applicant, their employer or some combination of the two. Most visa applications require four or five separate payments via different systems, each with their own login.

Police registration requirement

First introduced by the War Precautions Act of 1914, extended by the Aliens Restriction Act of 1919 and then renewed by the Immigration Act of 1971, the police registration provisions require nationals of 42 countries to register their status with local police in the UK and inform the police whenever their personal details change – this must occur within a prescribed time limit. This includes changes to address, marital status, immigration status or passport. The initial registration costs £34 but subsequent notifications of change of status do not attract additional fees.

Nationalities covered by this requirement include:

- Argentina
- Brazil
- Cuba
- China
- Egypt
- Israel
- Turkey
- Uzbekistan.

Points-based system (PBS)

The collection of immigration routes, or categories, under which non-EEA nationals apply for permission to live and work in the UK. The main provisions of the scheme were phased in between 2008 and 2010 and consist of the following tiers:

- Tier 1 – ‘High value’ migrants, e.g. investors, entrepreneurs, ‘exceptionally talented’.
- Tier 2 – Skilled workers sponsored by a UK employer.
- Tier 3 – Low skilled workers – not currently open to any applicants.
- Tier 4 – Students.
- Tier 5 – Temporary workers.

Resident labour market test (RLMT)

The mechanism by which employers must demonstrate that they are unable to locate a suitable settled worker before being allowed to sponsor a non-EEA worker. Generally this involves advertising a role for 28 days on two websites, including the DirectGov ‘Find a job’ website. Adverts must contain specific information to qualify as a compliant RLMT, including a closing date, indication of salary, location and a full job description with requirements.

The Migration Advisory Committee has recommended the abolition of the RLMT or otherwise that it should only be required for roles with lower salaries, for example those attracting less than £50,000 per annum.

Right to work checks

The UK operates a robust illegal working regime that requires employers to perform compliant right to work checks on all candidates before they commence employment, regardless of nationality. Employers must review an original document prescribed by Home Office policy, such as a passport, and must either see the candidate in person or via video link to establish that they are the genuine holder of the document. Employers must also retain a copy of the document checked and record the date the check took place.

Where a non-EEA national holds a time-limited immigration status, i.e. a status or visa that will expire, their employer is required to monitor the expiry date and perform a repeat right to work check to ensure that the employee has extended their status – and therefore their validity to work.

Sponsor licence application process

In order to sponsor non-EEA nationals for a Tier 2 visa, a UK employer must first apply to UKVI for a Tier 2 sponsor licence. This process includes completing an online application form and then sending specific original or certified copy documentation to UKVI. The documentation, which typically includes corporate bank statements, an office lease and VAT or PAYE registration, can often take start-ups and new UK branches of overseas companies some time to obtain. Where mandatory documentation is omitted, the application will typically be rejected.

Sponsor management system (SMS)

An online system operated by UKVI through which sponsors assign certificates of sponsorship to visa applicants. The SMS provides basic functionality to search for a certificate of sponsorship that has previously been assigned, and view and alter some basic information held by UKVI on the employer and their staff. The system is largely unchanged since its introduction in 2008 and many respondents commented that it is not particularly user-friendly and lacks functionality to support more frequent users of the system.

Sponsor ratings

When UKVI approves an application by a UK employer for a Tier 2 sponsor licence, it will by default grant an 'A-rated' sponsor licence, on the assumption that the employer has systems in place to comply with the sponsor duties imposed by UKVI, including right to work checks, monitoring attendance and document retention. UKVI monitors compliance with these sponsor duties via ad-hoc review of certificates of sponsorship and visa applications, as well as announced and unannounced audits conducted by UKVI staff at the employer's offices. Non-compliance can lead to a sponsor licence being 'downgraded' to a B-rating, preventing the employer sponsoring any new workers until the non-compliance has been rectified and this evidenced to UKVI. Extreme or persistent non-compliance can result in the sponsor licence being revoked, resulting in all Tier 2 visa holders losing their immigration status, forcing them to switch to another employer/ sponsor or otherwise leave the UK.

Tier 2

Tier 2 of the points-based system is the main route used by nearly 30,000 UK employers to bring overseas talent to the UK, as there are few alternative visa options available. Of 245,131 work visas granted inside and outside the UK in 2017, Tier 2 visas made up over 60%²⁸. Employers typically use one of the following categories within Tier 2:

- The Tier 2 (Intra-company Transfer) visa category allows employees to be transferred to the UK branch of their overseas employer, generally for up to five-years.
- The Tier 2 (General) visa category is used for new hires into a UK organisation and normally allows the holder to settle permanently in the UK after five-years.

TB testing

Non-EEA nationals applying for a visa of more than six months from a country with a high incidence of pulmonary tuberculosis are required to undergo a clinical examination, in most cases an X-ray, to demonstrate that they are free from tuberculosis. These clinical examinations, or 'TB tests', may only be performed by clinics approved by the Home Office, of which there are typically only a limited number in each location.

UK Visas and Immigration (UKVI)

The operational wing of the Home Office that runs the UK's immigration system. This function was previously administered by the UK Border Agency (UKBA) as an executive agency until 2013.

Visa

A generic name for the grant of an immigration status that enables the holder to perform certain activities in the UK, dependent on the immigration category or route under which the visa has been granted – for example:

- A visitor visa enables the holder to visit the UK for up to six months but not to perform substantive work in the UK.
- A Tier 2 visa enables the holder to live and work in the UK for the length the visa has been granted.

28 Office for National Statistics, 'Immigration Statistics', (August 2018), available at: <https://www.gov.uk/government/statistics/immigration-statistics-year-ending-june-2018>

About the City of London Corporation

The City of London Corporation is the governing body of the Square Mile dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK.

We aim to:

- Contribute to a flourishing society
- Support a thriving economy
- Shape outstanding environments

By strengthening the connections, capacity and character of the City, London and the UK for the benefit of people who live, work and visit here. For more information about the City of London Corporation, please visit www.cityoflondon.gov.uk

About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. For more information about our organization, please visit ey.com

EY is a leader in shaping the financial services industry. Over 30,000 of our people are dedicated to financial services, serving the banking and capital markets, insurance, and wealth and asset management sectors. At EY Financial Services, we share a single focus to build a better financial services industry, not just for now, but for the future.

Ernst & Young LLP

The UK firm Ernst & Young LLP is a limited liability partnership registered in England and Wales with registered number OC300001 and is a member firm of Ernst & Young Global Limited.

Ernst & Young LLP, 1 More London Place, London, SE1 2AF.