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Dear Monique Hawkins,

Thank you for your letter of 01 August 2023 to Robert Jenrick MP - Minister for Immigration and Lord Murray of Blidworth – former Parliamentary Under Secretary of State at the Home Office, regarding the issues faced by individuals with eVisas, specifically being unable to access digital status at all, inability to generate share codes, or incorrect data being presented in digital status.

We appreciate your interest in this matter. We have shared your queries with the appropriate technical team. Please find below our responses:

Problems viewing status

Q1. What can cause the situation where someone can log in to their UKVI account and receive a two-factor authentication code, but then receives an error instead of being presented with their immigration status?

Q2. Is it correct for us to describe this situation as being a mismatch in status holder identification details / access keys between the UKVI account and the Person Centric Data Platform (PCDP)?

If not, why not?

There is no single root cause to which all issues with people's use of share codes can be attributed. We have had share code issues reported to us by Account holders which have stemmed from a range of different technical glitches. When reported to us via the Resolution Centre, these issues are traced to their root cause and fixed.

However, the mismatch in status ID details and access keys you refer to in Q2 is not one we recognise as a cause of share code generation issues.

Q3. Is the Home Office able to run a programmatic audit to identify all affected records in which people can successfully log into their UKVI accounts and receive a two-factor authentication code, but then receive an error instead of being presented with their immigration status?

a. If so, has the Home Office run such an audit? Are proactive efforts made to correct these mismatched records?

b. If not, why is this not possible?

It is not possible to run an audit in the way suggested. To check whether a person can generate a share code after signing into their Account would require the Account holder to go through the two-factor authentication process, whereby the Account holder is sent a code by email or SMS (text) message which they must use as part of the sign-in process. We cannot simulate that sign-in process to test or check a person's *View and Prove* status or ability to generate a share code except on an individual basis where a person has contacted the Resolution Centre and is able to sign into their Account while the Resolution Centre agent is on a call with them.

Q4. Are there additional situations where the PCDP is only temporarily unavailable to an individual, so that the same individual is able to view their immigration status after inputting their two-factor authentication code when they try again at a later time? If so, what causes these situations?

Yes, there have been technical incidents where the details of a person's immigration status could not be retrieved from the data platform by the *View and Prove* service. These have had different root causes. When these incidents occur, we may take down our online services until the issue is resolved, i.e. anyone attempting to use the services would be shown an error page until services are restored.

Problems proving status

Q5. What can cause the situation whereby someone can log into their UKVI account, view their immigration status, but receive an error when pressing the "Prove your status" button?

Q6. Are there situations where the status sharing services are unavailable to an individual, so that they are unable to use the "Prove your status" button, because that individual's data needs correcting? Or do such situations only arise due to problems with the availability or connectivity of Home Office services?

Q7. Do the status sharing services (for generating Right to Work, Right to Rent and Something Else share codes) have their own access keys, and can those keys be misaligned with the identification details / access keys held in UKVI/PCDP?

Q8. Is the Home Office able to run a programmatic audit to identify all affected records in which there have been instances where people can log in and view their UKVI accounts, but receive an error when they want to go on to prove their status?

a. If so, has the Home Office run such an audit? Are proactive efforts made to correct these mismatched records?

b. If not, why is this not possible?

Please see responses to questions above.

Further form of 'entangled status': 'entangled proof of status'

Q9. In your answer to our previous question Q1.b, you explained that

“As part of processing a request to update a UKVI account holder’s ID Document, we have operational safeguards in place to ensure that immigration statuses are not entangled due to a mistake by the account holder (for example if they were to input a document number incorrectly).”

However, we spoke to someone who, together with his partner, attempted to update both their UKVI accounts with their respective renewed passports. After the update, logging in with either his own new passport/date of birth or his partner’s new passport/date of birth resulted in his partner’s immigration status being displayed, with his own immigration status becoming inaccessible. It took a month to resolve this situation after reporting to the Resolution Centre.

In his initial report to us, he explained:

“My passport got linked by mistake into my partner's profile when we updated both our accounts with new ID documents at the same time; we have no idea how this happened (perhaps via cookie settings; I may have closed the browser after updating his profile and then been redirected to his profile via cookies when I thought I had logged in using my own details). When we applied for a remortgage, we found that I could not prove my status any longer. Instead both of us could prove his status. Which is very concerning -, both of us have different nationalities, different names, different dates of birth.”

Recalling your assurance in your answer to our previous question Q1.b above, please provide details about the operational safeguards you have in place to prevent this happening. How would the above situation have occurred despite these safeguards?

There are two different document update processes available via the UKVI Account.

The main process for adding an ID document to the UKVI Account is the scenario where the new ID document is issued in the same core identity details as the existing one held by the Home Office. We complete a series of checks in this process, including an automated comparison of the Nationality, Date of Birth and Name on

both old and new ID documents. If these details do not match exactly, then the change request is referred to a caseworker for consideration. The caseworker would reject the update request and signpost the customer to the alternative update process if the identities on both documents were completely different.

The other ID document update process is for the scenario where the customer's core identity has changed, for example if the applicant has changed their name. This process has additional security checks and currently requires the customer to post their new ID document to the Home Office for manual caseworker review. In this process there is a comparison of the image on the new vs old passport to confirm that both old and new ID documents belong to the same person.

We are unable to comment on the potential circumstances of the case study outlined in the question without further details, for example when the update was requested, and which update process was used. We would welcome the opportunity to review this case and provide further explanation if more details were able to be provided.

Q10. In your answer to our previous question Q3, you stated

“Please note that not all entangled immigration statuses result in an individual’s status profile appearing incorrect.”

Do you include our description of ‘entangled proof of status’ in your set of “entangled immigration statuses [which do not] result in an individual’s status profile appearing incorrect”, due to the fact that their profile appears correct at the first stage (before an attempt to prove the status via share code sharing reveals the entanglement)?

We don't fully understand this question. If you are asking whether an “entangled status” could be the root cause of a person's inability to generate a share code, the answer is probably yes. Issues generating share codes can trace back to a range of technical root causes, which may include entangled identities and immigration statuses.

Q11. Could you describe all situations you referred to where entangled immigration statuses do not result in an individual’s status profile appearing incorrect? In what ways, other than the visible, might an immigration status be entangled?

A person whose identity and immigration status had been entangled with another person's identity and status may see no appreciable inaccuracy in their *View and Prove* profile. As a hypothetical example, a person's identity may become associated with another person's immigration status, so that when signing into *View and Prove*, they would see their own face image and biographic details, but an immigration status belonging to another person. However, if both individuals had Settled Status under the EU Settlement Scheme, the impact of the entanglement would be negligible on the person seeking to use *View and Prove* to demonstrate their right to work, etc.

Q12. In your answer to our previous August 2022 question Q3(a), you explained that you were able to scan your data platforms to identify risks that

an entangled immigration status has occurred, and that you ran this in August 2022, and that you continue to improve it.

a. For the August 2022 scan:

i. How many cases of immigration status that were affected by entanglement did you encounter?

ii. Out of these, in how many cases had the individual contacted you to notify you that they had discovered this?

iii. In how many cases did you fix the entanglement before it was discovered by the individual?

b. Where someone's display of status shows it is entangled with the details of another person, has the display of status also been entangled for the other individual?

c. How many subsequent scans were run, when were they run, and what were the above metrics for those scans?

d. Are these scans run on a regular basis, and if so how frequently?

We are not able to provide this data as it is not held in this form.

13. In your answer to our previous August 2022 question Q8, you said that you would release the Data Protection Impact Assessment (DPIA) at a future date. We have seen a DPIA for the Person Centric Data Platform (PCDP), released via FOI1 in December 2022.

a. Is the PCDP DPIA the same as the DPIA for View & Prove that was refused in another FOI2 in November 2021? This FOI requested in its question 3 "Please provide copies of any equality impact assessments or data protection impact assessments completed in relation to the View and Prove service." and was refused on the grounds of being "exempt from disclosure under section 22 of the FOIA. This provides that information can be withheld if it is intended for future publication."

b. If the View & Prove DPIA is distinct from the PCDP DPIA, are you now in a position to disclose the View & Prove DPIA? If not, what is the reason for not disclosing it now if in November 2021 you stated it was intended for future publication?

The DPIA for View & Prove is not the same as the DPIA for PCDP. The DPIA for View & Prove will be published at a later date.

Q14. What can cause the situation where someone can log into their UKVI account, view their correct immigration status details, but when pressing the "Prove your status" button then see entangled proof of status?

Please see responses to questions above.

Q15. The experiences shared with us indicate that fixing these problems can take from weeks to months. Why does it require such a long time to repair an individual's entangled status, or entangled proof of status, after it has been reported to the Settlement Resolution Centre?

When issues are reported to the Resolution Centre they are investigated and resolved as soon as possible. Without commenting on individual cases, we can say that some individuals may have a complex immigration history and correcting the data we hold on individuals so they can use our services may require effort from a range of teams within the Home Office, which can take time to implement.

Q16. How many reports of entangled status, and of entangled proof of status, has the Settlement Resolution Centre received since 1 July 2021?

Please see response to Q12 above.

Q17. Is the Home Office able to run a programmatic audit to identify all records where people can log into their UKVI accounts and view their correct immigration status details, but when pressing the "Prove your status" button then see entangled proof of status?

a. If so, has the Home Office run such an audit? Are proactive efforts made to correct these mismatched records?

b. Where someone's proof of status shows it is entangled with the details of another person, has the proof of status also been entangled for the other individual?

c. If an audit has been run, how many records were identified as affected by 'entangled proof of status'?

d. If an audit has not been run, why is this not possible?

Please see responses to questions above.

Yours sincerely

eVisas Policy Team

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