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DECS Reference: TRO/0338254/22

07 June 2023

Dear Monique Hawkins,

Thank you for your letter of 8 March 2022 to Kevin Foster MP, former Minister for Safe and Legal Migration, providing further details on your proposal that we should provide individuals with digital immigration status a permanent QR code to prove that status. Your letter has been passed to me to reply. I apologise for the delay in responding.

We appreciate your interest in this matter. We have shared your queries with the appropriate technical team responsible for the provision of our Digital Status services, and the points raised in your correspondence have been given serious and detailed consideration.

Before responding to the points raised in your letter, we will provide some information on the wider roadmap for Digital Status services (currently *View and Prove*, *Right to Work*, *Right to Rent* and our data-sharing interfaces with other Government departments and agencies). This should provide some context to help you understand our evaluation of your proposals.

The Home Office is rolling out an immigration system that is "digital by default" in which applications, grants, and immigration status checks are all done digitally. eVisas will be issued in a digital format (without physical documentation). A person issued with an eVisa is notified by email and can view and share their eVisa online using the *View and Prove* service.

The first eVisas issued by the Home Office were to EU Settlement Scheme applicants; over six million people have now received EUSS eVisas. Since the introduction of the EU Settlement Scheme, we have introduced eVisas on other

routes, including for EEA nationals applying on routes such as work and study, those applying on the Hong Kong British Nationals Overseas route (BNOs) and those applying under the Ukraine Schemes. Over half a million non-EUSS eVisas have been issued.

eVisas offer significant benefits to users:

- People receive their eVisa instantly once a decision is made on their application. There is no wait for physical documents to be dispatched, collected or received. People can view and share the entitlements immediately.

- People or organisations required to check a person's immigration status can do so using the online checking services, which provide clear, comprehensive and unambiguous details about the holder's current status and entitlements in the UK, in contrast to the truncated remarks currently printed on Biometric Residence Permits (BRPs) and Biometric Residence Cards (BRCs), or stamps on passports from the border, which may require supplementary guidance to interpret.

- Some organisations required to check a person's immigration status to determine their eligibility for services can check directly using data-sharing interfaces with the Home Office. A person applying for access to services need only provide proof of identity to the organisation e.g. provide Department for Work and Pensions with their passport number, and immigration status checks can be run automatically. This makes back-office processes faster, reducing the time an applicant may need to wait to access services and reduces the need for the individual to go online and prove their rights. Such direct checking services currently include the Department for Work and Pensions (DWP), HM Revenue and Customs (HMRC), DVLA, Social Security Scotland, NHS England and Wales, and Islington Council, and we aim to continue to develop further services during 2023 and 2024, including extending to some other local authorities (via Islington Council's NRPF Connect System) and the Student Loans Company.

Our plan is to continue to roll out eVisas in 2023 and 2024 until all new and existing customers (people with an immigration status) will have eVisas which can be viewed, checked, and shared digitally. Once this rollout is complete, the issue and use of BRPs and most other forms of physical immigration documentation will cease, which is expected to be by no later than the end of 2024.

This is a substantial and complex programme of work comprised of several different workstreams we will be undertaking in parallel:

- **Enhancements and additional features** for our online services and data-sharing interfaces, to resolve known issues and release further benefits, such as reflecting when status is extended by events such as an in-time appeal, in a way that is not possible with a physical document. This work will be delivered in stages and completed by the end of 2023.

- **Coverage** expansion so that everyone, with any type of immigration status, is covered by our online services and data-sharing interfaces. This includes the digitisation of historical immigration status records. This work is being delivered in stages and will be completed by mid-2024.

- **UKVI Account** improvements and expansion of our customer account offering, so that account creation is a clear part of all new visa applications and people with historical immigration status can register for an account as a stand-alone activity, allowing them to access their eVisa. Accounts enable customers to sign into our *View and Prove*, *Update my Details* and other online services. This work is being delivered in stages with a number of enhancements being rolled out during 2023 and 2024.

- **Universal permission to travel** checks, so that anyone boarding a plane or other carrier to the UK will have their permission to travel (conferred by an eVisa or an Electronic Travel Authorisation) checked electronically directly with the Home Office before boarding. This work is being delivered in stages starting in late 2023 and it is anticipated the full regime will be in place by early 2025.

- **Continuous Improvement** of our services, driven by user feedback and including the connection of additional data-sharing interfaces with other Government departments (including local authorities) and Agencies. The data-sharing interfaces are used to check people's status directly, without the need for a share code to be generated.

By 2024, we will have delivered an immigration system in which everyone with an immigration status is able to sign into our online services to view, check and share their eVisa. Rapid, high-volume automated checks of immigration status will be made directly by government and other public bodies, reducing the need for people to generate share codes to prove their status. The system will be underpinned by appropriate support for those who find it difficult to use the online services, the support will scale appropriately as the number of people with eVisas increases.

This is the context within which we have reviewed your latest letter about your QR code proposal. When the system is fully rolled out, we do not believe there will be many scenarios in which possession of a printed proof of immigration status would provide particular benefit to an individual. People will be able to prove their right to public services like healthcare, benefits, and tax credits simply by providing their identity details to the appropriate organisation; their immigration status can then be checked automatically. People will be able to prove their right to work, rent, study, open bank accounts etc. to individuals and organisations by generating share codes and passing them on. This includes providing share codes to overseas organisations or governments. Other Government Departments are able to contact the Home Office via established channels to confirm a person's status, where reference to a Home Office source system is required to confirm status. The Resolution Centre (RC) is also available to provide support to log technical issues and work through to resolution with our Home Office Digital, Data and Technology Teams.

On the rare occasions when our digital services are unavailable, for example when planned maintenance is taking place, people will only need to wait for an hour or so before they are back online and share codes can be generated and shared again. We do not envisage any circumstances where a person loses out on something they are entitled to due to a temporary outage of our online services. Most checks are not time critical; if an employer, for example, is unable to check someone's right to work with a share code because our *Right to Work* checking service is temporarily unavailable, they can try again later.

However, where individuals do have a time-critical need to share their status, or experience longer-term ongoing issues with their eVisas (such as incorrect information being displayed on our online services), the RC will continue to provide an offline route for obtaining proof of rights in those rare urgent instances, or when a person experiences a persistent problem with generating share codes.

In your correspondence, you have cited vulnerable and digitally disadvantaged people who would benefit from the issue of printed documents as proof of their immigration status. We fully agree that the immigration system must meet the needs of people who find it difficult to use digital services. However, as described above, in order to claim most forms of state support, people will not need to sign into our online services to prove their immigration status, as it will be directly checked by the relevant organisation. The number of times anyone would need to go online to prove their rights is minimised by this data-sharing.

On the occasions where such an individual does need to generate a share code, there is provision made within the account for an appropriate third party to support the individual in generating a code. Those who genuinely cannot access online services can also be supported by the RC, who are able to generate a share code on behalf of the individual where required. The RC will also be able to assist users who are experiencing technical issues with their online immigration status, and where necessary, enable individuals' status to be verified through alternative means.

Based on our own user research, stakeholder engagement, and feedback received, we acknowledge there remain some limited scenarios where people could benefit from a secure, printed document or other "offline token" that enables them to prove their immigration status. The first of these is in the context of travel, and the second is for those who are digitally excluded and do not have additional support or help. We believe these are the only two scenarios in the "digital by default" immigration system in which a fallback to our online services would have value.

In the case of a carrier system outage, it is the carrier's responsibility to decide whether to carry the passenger and accept the risk of receiving a carrier liability charge. In this case, secure physical evidence of status may reassure the carrier that they are not taking a risk by carrying the person, although they can also accept status shared via a share code as evidence of status, if they are able to access this during their system outage. In the case of a Home Office system outage, we would expect that all customers can be carried and carriers liability may, if appropriate, be waived.

Based on your correspondence, we understand that it is the second scenario (those who are digitally excluded and do not have additional support or help) that primarily

concerns you and has inspired your proposal for introducing secure 2D barcodes as proof of immigration status. When a digitally excluded person without third party support needs to show their eVisa to an individual or organisation which does not have access to data-sharing of immigration status and is persistently unable to generate a share code, they can already call our helpline for support in accessing our online services. We accept that there may be individuals who have limited access to facilities and/or devices, and knowledge of, or trust in, the immigration system, the support available to them, and other authorities. This could lead to vulnerable people missing out on services they are entitled to. In this scenario, a secure physical token (e.g. a 2D barcode) linking to their eVisa may have value.

In your letter, you list 20 points which respond to technical and other objections we had raised in response to your original proposal. We appreciate the effort you have invested into making a technically feasible proposal. We will not attempt to refute or otherwise address your points individually. We concede that, while the current limitations of 2D barcode technology pose barriers to the adoption of the technology for proof of immigration status, it is possible to envisage ways to make the technology work in a way that would meet most of our requirements for security and identity verification.

We do not accept that a printed token suitable for use in the second scenario should be able to work offline. We cannot envisage any circumstances where an individual or organisation required to check an eVisa could not wait until our online services were available, or until they had internet connectivity, to carry out a check (other than the first scenario described above). One of the main benefits of our "digital by default" system is that all checks of status are made in real time on the master record we hold of people's immigration status. We will not compromise this principle by introducing a method for people to (for example) print a document that establishes they have indefinite leave to remain in the UK, when their leave may have been cancelled or revoked or lapsed since the document was generated.

What we are considering are solutions that enable a person to provide third parties with a way to check immigration status in a way which does not require the individual to navigate our online services every time they need to generate a share code. This could be as simple as a "long life" share code provided in the decision letter. The eVisa holder would retain the code and pass it on (along with their date of birth) to any third parties who needed to check their immigration status; the eVisa holder would not need to sign into *View and Prove* to generate a new share code each time they needed one. However, the disadvantage is that once a checker had been given such a code, they could use it at any time to continue checking a person's status, regardless of any need to do so, which poses privacy concerns.

A printed 2D barcode could add an additional level of convenience by encoding both a share code and date of birth so that, when scanned with a suitable mobile app, it granted access to a person's eVisa without recourse to any information from the eVisa holder themselves. It is not clear that this would offer any benefits over and above a long-life share code, in that a 2D bar code would be harder to share remotely and would always require internet-connected scanning technology to access and read.

You will appreciate from the information about our plans above that we have a significant amount of work to do between now and the end of 2024. We agree with you that we must ensure digitally disadvantaged individuals are not penalised or locked out of the immigration system, and accept that secure printed tokens may offer value to such individuals, whilst also having some significant drawbacks. However, our capacity to deliver a complex solution to the problem (e.g. the apparatus with which to generate and scan 2D barcodes) is limited over the next 12-18 months. We are focusing our resources and efforts on the things that will most benefit users, as set out above, and we believe there are already adequate support systems in place for those less able to use digital products.

We propose that:

- We continue to maintain open lines of communication with the3million and other key stakeholders, in particular through the advisory groups which you have recently been invited to attend;
- We will continue to monitor use of RC and monitor and evaluate user needs in this area
- You provide us with any feedback or further amendments on your QR code proposal, including your feedback on the "long life share code" idea posed above;
- In late 2023 or early 2024, when there is capacity, we will look again at whether alternative solutions could be deployed, and whether there are further solutions for providing disadvantaged users with a means to give third parties access to their eVisa without the need to interact with our online services. We will take your proposal, and any other evidence or suggestions you have, into account.

Yours sincerely

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