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By email:

Tom Pursglove MP - Minister for Immigration
Lord Sharpe of Epsom - Parliamentary Under Secretary of State at the Home Office

CC:

Home Office SUG team
Independent Monitoring Authority

30 January 2024

Dear Tom Pursglove MP,

UKVI accounts listing all linked identity documents - further follow-up

We are writing this letter as a follow-up to our letter of 10 January[1], regarding a recent change to the functionality of UKVI account maintenance. Following this change, status holders can see a list of travel documents linked to their account, rather than only the last linked document.

Since writing our previous letter, we have continued receiving reports from people who cannot see all the identity documents that they believed had previously been linked to their account, including the identity document they used to obtain status under the EU Settlement Scheme. As detailed in the previous letter, they receive an error if they attempt to (re-)link those documents to their UKVI account.

There is a great deal of confusion and anxiety around whether this will cause problems when travelling in the future, especially when the Electronic Travel Authorisation (ETA) scheme is fully operational and everyone needs to be granted a digital-only "Permission to Travel" via their travel document.

In this letter we would like to highlight some further concerning issues that have been reported to us:

1. A persistent problem in accessing the update functionality
2. Home Office helplines giving incorrect information
3. Issues for people with more than one nationality
4. Issues where the name in the Machine Readable Zone (MRZ) of their document does not match the name shown in the Visual Inspection Zone (VIZ) of their document

We set out all these issues in more detail below, along with a number of additional questions which we would ask that you address urgently.

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[1] https://the3million.org.uk/publication/2024011001

1. **A persistent problem in accessing the update functionality**

We have received a number of reports where people have tried, over a period of weeks, to link new travel documents to their UKVI status, and receive an error message.

As the Home Office has explained to us in many meetings, from 2025 people with UK immigration status will only be able to check-in online for travel to the UK if their check-in results in a digital "Permission to travel" message from the Home Office interactive Advance Passenger Information (iAPI) system. Receiving that permission depends entirely on the citizen's travel document being correctly linked to their UKVI status.

Therefore, being unable to link a new travel document to one's UKVI status will have a serious impact on someone's ability to travel back to the UK. As you will be aware, we have been reporting on problems with maintaining digital status for a number of years, including through our detailed [report of March 2022](#)[2] to the Independent Monitoring Authority. The majority of issues highlighted in that report remain unresolved to date.

The recent reports all show a complete inability - over several weeks - to access the update functionality. A sample of excerpts from reports below describe the problem:

> "*Just renewed my passport which means I need to update it on my UKVI account. **I've been trying to update it for weeks now**, however the same old message keeps popping up - 'Sorry, there is a problem with the service'. Customer service said they'd sort it out with the tech team. It's still not been sorted so I've had to call them again today to try to escalate the problem. I've followed all the relevant steps e.g. clearing caches and internet searches, tried on a different device, tried in incognito. I am worried and anxious as I won't be able to go abroad unless my passport details have been updated online. We need a physical proof of status.*"

> "*When I try to update my passport no. and I log in my UKVI account, the personal details landing page is just shown for a split second and then I am automatically redirected to an error page displaying the message "Sorry there's a problem with the service". I tried to access from different browsers and laptops but **I always receive the same error since three weeks.**"*

> "*I have settled status and I need to update my passport number as I just renewed it. But when I login on https://www.gov.uk/update-uk-visas-immigration-account-details/update-your-ukvi-account, I get an error message saying: "Sorry, there is a problem with the service." I have reached out to the EU Resolution Centre, who told me to login with this link: https://view-and-prove-your-rights.homeoffice.gov.uk/eu-settlement/start. But I get another error message "404 not found"*

We reproduce below a screenshot of the error message:

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[2] https://www.the3million.org.uk/ima-reports

We have the following questions:

Q1.   How long has the Home Office been aware of this problem?

Q2.   When did this problem first arise?

Q3.   Does this problem affect everyone who attempts to link identity documents to their UKVI account, or only a subset of people? If only a subset, how many UKVI accounts are affected by this problem?

Q4.   What has caused this problem?

Q5.   When does the Home Office believe this problem will be fixed?

Q6.   How likely is this problem to reoccur in future, and what steps has the Home Office taken to prevent this from reoccurring?

2.   Home Office helplines giving incorrect information

Over the years we have had many reports of the Settlement Resolution Centre and the UKVI Contact Centre incorrectly telling people that it is not possible to link more than one identity document to a UKVI account. This was also detailed in our March 2022 report[3] to the IMA.

Almost two years on, and even following the recent new functionality to show all linked documents, some staff on the Home Office helplines still give out incorrect information. For example, a recent report to us said:

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[3] https://the3million.org.uk/publication/2022032801: "*Confusion around the ability to add new identity documents*", paragraphs 48-51 of

"When I logged in on the Update your details portal to see what identity documents are linked to my status, I only saw my national ID card. When I applied for pre-settled status initially, I used my passport and then I added my ID card when I found out that we can have multiple documents. I called the Home Office support line today, and maybe they don't know how it works? I was told that you can only have one document and I was asked to update my details to add a new identity document."

We have the following questions:

Q7. Is specific training provided to the Settlement Resolution Centre and UKVI Contact Centre in advance of new functionality being rolled out?

Q8. Was training provided to the Settlement Resolution Centre and UKVI Contact Centre in advance of this particular new functionality (UKVI account displaying all linked identity documents)?

3. Issues for people with more than one nationality

As we set out in our letter of 10 January, many people are reporting missing linked identity documents from their UKVI account.

We have received some reports where the fact that someone has more than one nationality is causing extra complications.

In these cases the UKVI account appears to have entirely "forgotten" about one of their nationalities, and forces them to physically post a passport to the Home Office even though that passport was originally used via the '*EU Exit: ID Document Check*' app to obtain status.

Consider the following case (details changed for anonymity) of a French/Austrian dual national who contacted us:

● They applied to the EU Settlement Scheme in 2019 with their French passport, and were granted settled status.
● During their application to the EU Settlement Scheme (in the second, webbrowser stage of their application), they were asked if they had any other nationalities, and they informed the Home Office they also had Austrian nationality.
● Sometime in 2021, they became aware that they could add other identity documents to their UKVI account, so they added their Austrian national identity card which became their login document. Please note, they were not required to post this national identity card to the Home Office.
● Sometime in 2022, they obtained an Austrian passport, and also added that to their UKVI account. This is now their login document. Again, they were not required to post this national identity card to the Home Office.
● This month, January 2024, they found out that it should now be possible to see all linked identity documents.
● However, their UKVI account only shows their Austrian national identity card and passport, and does not show their French passport.

To rectify this situation, they tried to add their original French passport (with which they were granted their settled status), as follows:

- they clicked the "*Add a new identity document*" link
- the next screen asks the question "*Have your personal details changed on your new identity document?*" and shows their nationality as "*Austrian*".
- they have to choose one of the following two options:

  - "**No, my personal details have not changed**"

    If they select this, and take a photograph of their French passport, they get an error saying

    There is a problem with this photo.
    Nationality does not match your account
    The nationality we read from this photo: French
    You need to upload a new photo of your passport to continue

  - "**Yes, my name, nationality or date of birth has changed**"

    If they select this, they are told they need to send their passport by post to the Home Office.

Clearly this process is not appropriate to their situation.

Firstly, their personal details have <u>not</u> changed.

Secondly, even if they are willing, for the sake of this process, to answer that their nationality <u>has</u> changed, this person is understandably unwilling to post their French passport to the Home Office, both for fear of it being lost, and because it seems entirely unreasonable to have to do so given they used this same passport to apply for, and be granted, settled status several years prior.

We have the following questions:

Q9. In the case above, the Home Office was informed about both the applicant's nationalities at the time of applying to the EU Settlement Scheme. However, the UKVI account now only knows about one of those nationalities. Therefore we ask, irrespective of whether additional identity documents were actually linked to someone's UKVI account:

  a. What is the reason for nationalities that were named as part of the EUSS application process, being lost from someone's UKVI account?

  b. In how many cases have individuals' nationalities (that were named as part of the EUSS application process) been lost from their UKVI account?

    c.   Can the Home Office use its datasets to automatically reinstate any missing nationalities from people's UKVI accounts, and if so will they do so and when will this be done?

Q10. Is the Home Office able to manually correct such UKVI accounts, to restore knowledge of a nationality previously linked to the account? If so, what should affected citizens do in order to get such a correction? If not, why is this not possible?

Q11. Can the Home Office confirm that if such a UKVI account were to be corrected, then the "*Add a new identity document*" screen would list **all** the individual's nationalities, and someone could add new identity documents without being required to send their documents in the post?

4.   Issues where the name in the Machine Readable Zone (MRZ) of their document does not match the name shown in the Visual Inspection Zone (VIZ) of their document

The system continues to be problematic for people whose name in the Machine Readable Zone (MRZ) of their document does not match their name as used in daily life and as shown in other parts of their passport.

We have previously [written to the Home Office](#)[4] about this in May 2022, in the context of most often, married women. The [Home Office reply](#)[5] from November 2022 confirmed that it is possible for people to update their UKVI account to reflect what the VIZ of an identity document shows. For example, whereas the MRZ might show only someone's birth surname, the VIZ might show this birth surname accompanied by a line saying "spouse of *[Married Name]*", where *[Married Name]* is the name used in daily life in the UK, including by employers, HMRC, DVLA, the NHS etc.

However, the reply also made clear that in order to get their UKVI account updated, people would need to send in their identity documents by post. This is despite the fact that it is possible to upload a photograph of their identity document, and that in most cases the same identity document had already been scanned and photographed at the time of initially applying to the EU Settlement Scheme.

When we asked about an improved process, the letter stated:

> "*the process outlined is an **interim way** of reflecting married name on the user's digital status, and **we recognise that this is an imperfect solution** which will not scale. **We are currently in the process of improving the customer experience** by building a specific process for customers who would like to display their married name in addition to the MRZ name on their digital status*"

We also asked that the resulting updated display be made more understandable to those checking status. We explained that View & Prove would for example display, in all capital letters:

> "FIRSTNAME MIDDLENAME BIRTHNAME EP MARRIEDNAME"

Whereas on a passport, it would be clear that "EP" would mean spouse of, and "MARRIEDNAME" would be listed on a separate line in a lighter font.

Again, the reply set out:

> "***We recognise that the process*** outlined in question 2 for reflecting married name on the user's digital status ***requires improvement***. ***We are currently in the process of improving the customer experience*** by building a specific process for customers who would like to display their married name in their VIZ in addition to the MRZ name on their digital status."

We continue to receive reports where even this manual interim process is not working; see for example this report to us:

> "I sent my passport to update my settled status due to a new name. I received a letter from them to confirm the update. I am still not able to access my settled status with my new passport and neither have they changed my name after almost 2 years."

There are many other situations where the use of the MRZ name in issuing status is causing problems. For example:

- There is a limit of 39 characters to hold the name in the MRZ. When people have longer names, their names are truncated in the MRZ, as specified in Part 4 of the International Civil Aviation Organization document 9303[6]. The VIZ would show someone's entire name, untruncated.
- Diacritical marks are not allowed in the MRZ, so people's UKVI account shows a discrepancy with someone's name used in daily life. For example the letter o with umlaut (ö) would likely be noted as "OE" in the MRZ, and therefore the UKVI account would show "OE". However, diacritical marks *are* allowed in the VIZ, and this is more likely to match the names used in daily life.
- Names in Cyrillic or Arabic scripts are transliterated into the Latin alphabet in the MRZ, and this may result in a variant of the transliterated name used by people in their daily lives.

The inaccurate reflection of an individual's name on their online status can cause several problems. For example, if an employer conducts a right to work check, they will see a different version of the employee's name than what they expect. The same issue could arise when a landlord conducts a right to rent check, or an individual is trying to open a bank account. This creation of unnecessary delays in immigration checks ultimately restricts a status-holder's ability to access the rights they are entitled to. It is therefore crucial that the Home Office address the matter.

We have the following questions:

Q12. When will the customer experience (for updating a UKVI account to reflect VIZ information) be improved, as promised in the Home Office letter to us of November 2022?

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[6] https://www.icao.int/publications/pages/publication.aspx?docnum=9303

Q13. Regarding this improved experience, will this address each of the following:

a. not having to post an identity document to the Home Office;

b. the information being displayed in a more understandable format than all capitals in a single line;

c. being available not just for married name purposes, but also to address truncation, diacritical marks and transliteration of Cyrillic and Arabic scripts?

Q14. When new functionality is made available to improve the customer experience, will the Home Office contact all digital status holders to make them aware of this new functionality?

Kind regards,

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