



# **A new charging regime for Immigration and Nationality fees**

## **Race Equality Impact Assessment Report**

**15<sup>th</sup> March 2007**



<b>EQUALITY IMPACT ASSESSMENT</b>
Customer Services Directorate
Managed Migration
IND

**PRELIMINARY SCREENING**

<b>Date of Screening</b>	13 <sup>th</sup> March 2007
<b>Name of Policy Writer</b>	Alan Bucknall
<b>Director General</b>	<b>Lin Homer</b>

<b>Name of Policy</b>	<input type="checkbox"/>	This is a <b>new</b> policy
	<input checked="" type="checkbox"/>	This is a <b>change</b> to an existing policy
	<input type="checkbox"/>	This is an <b>existing</b> policy

**Policy Aims, Objectives & Projected Outcomes**

Develop a charging policy that ensures individuals get a fast, effective, and secure service, ensuring the right technology and expertise are in place to protect the UK's borders. A robust immigration system through increased compliance and enforcement activity, is a key part in transforming how we manage immigration and prevent abuse.

Will the policy have an impact on national or local people/staff?	YES/NO
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy	YES/NO
Are there any aspects of the policy that could contribute to equality or inequality?	YES/NO
Could the aims of the policy be in conflict with equal opportunity, elimination of discrimination, promotion of good relations?	YES/NO
If this is an amendment of an existing policy, was the original policy impact assessed?	YES/NO

If your answer to any of these questions is **YES**, go on to the full EIA.

If you have answered **NO** to any particular questions, please provide explanatory evidence.

**Where the preliminary screening question has been answered NO there is no specific evidence currently available. The original charging policy was developed prior to the requirement for an impact assessment to be completed.**

If you have answered **NO** to all of these questions then you must also attach the following statement to all future submissions that are related to this policy and ensure it is signed off by senior management. You must also include this statement within any regulatory impact assessment that is related to this policy.

**“This policy was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. As a result of this**

**screening, it has been decided that a full equality impact assessment is not required. “**

## FULL IMPACT ASSESSMENT

### STATISTICS & RESEARCH

**What relevant quantitative & qualitative data do you have in relation to this policy?**

**Charging Consultation:** A public consultation exercise was launched on 30<sup>th</sup> October and was open for 8 weeks through to 22<sup>nd</sup> December. Over 3,000 copies of the consultation document were sent to stakeholders from all sectors of the UK and the document was available on the web. The consultation document included an easy to follow questionnaire containing 9 questions:

Q1 Do you think that we should set prices flexibly to take into account wider policy objectives such as attracting international students and people on business?

Q2 Should prices reflect a range of factors, or only those that are of value to the migrant?

Q3 Do you think that applications for citizenship should be priced according to value or the costs of processing the application?

Q4 With which of the following statements do you agree:

a) Fees should be set to help promote the UK as a competitive destination

b) Fees should be set according to the same principles, but might vary between the UK and overseas

c) Fees for the same service should be the same in the UK and overseas

Q5 Should employers and educational institutions be able to include payment of visa fees within sponsorship and certificate fees for international employees and students?

Q6 What help would sponsors need to ensure that they are acting legally in bringing in particular migrants?

Q7 How might any impact on small and medium-sized businesses be minimised?

Q8 What special measures might be needed for cultural and specialist groups?

Q9 Do you think that any of the proposals outlined would impact adversely upon community relations?

340 responses to the consultation were received and analysed.

During the consultation stakeholder events were held covering a wide range of sectors and included specific taskforces for Education, Employers and Arts & Entertainments.

**Visitor research:** GfK NOP was commissioned by UKvisas to evaluate price elasticity in the visit visa market. Research was undertaken in 8 countries amongst those considering the UK for a leisure trip in the next 5 years and involved 250 interviews in each of these countries: China, India, Pakistan, Turkey, Russia, Ghana, Nigeria and Saudi Arabia. Interviews were conducted face-to-face with respondents who fitted the agreed criteria.

**Econometric research:** The overall objective of this research study was to determine which of UKvisas' out of country visa-granting services are price sensitive and by how much, to which classes of traveller, student or would-be immigrant, from which country / countries. The countries were selected to correspond with those being used for the qualitative research study - China, India, Pakistan, Turkey, Russia, Ghana, Nigeria and Saudi Arabia.

**In-Country research:** Research was conducted to identify impacts of pricing on customers for in-country services as follows:

- Agents - dealing with work permits
- Leave to Remain – Student
- Agents - dealing with Student visas
- Leave to Remain – Other
- Nationality

<b>Equality Target Areas</b>	<b>How does the data identify potential or known positive impacts? How does the data identify any potential or known adverse impacts?</b>
<b>Race</b> (consider e.g. nationalities, Gypsies, Travellers, languages)	The research shows that there is a level of sensitivity in pricing across nationalities and travelling groups.
<b>Disability</b> (consider social access and physical access)	No impacts on disability
<b>Gender</b>	No impacts on gender
<b>Gender Identity</b>	No impacts on gender identity
<b>Religion and Belief</b>	No impacts on religion and belief
<b>Sexual Orientation</b>	No impacts on sexual orientation
<b>Age</b>	Some respondents to the consultation have raised the issue that there could be an impact on different age groups.

<p><b>What research have you considered commissioning to fill any data gaps?</b></p> <p>For example, you may need to ensure quantitative &amp; qualitative data groups include stakeholders with respect to this policy.  N.B Include any recommendations in your action plan</p>
<p>The research undertaken in the development of the charging policy has been comprehensive. As part of the ongoing monitoring of the impacts of the new fees further research may be commissioned if necessary.</p>

<p><b>Who are the stakeholders, community groups, staff or customers for this policy area?</b></p>
<p>The stakeholders for the charging policy include any user of the immigration services both external and internal to IND</p>

<p><b>What are the overall trends and patterns in this qualitative &amp; quantitative data?</b></p> <p>Disproportionality; regional variations; different levels of access, experiences or needs; combined impacts.</p>
<p>Many of the consultation responses stressed the need to keep the UK competitive with world markets.</p> <p>Some responses highlighted the potential impacts on applicants from poorer nations if the pricing set at a level that was too high for the local economy.</p> <p>The research showed that price sensitivity can have an impact on the movement of nationalities. However this is only one of a wide range of factors that can impact travel (economic, environmental, political, etc)</p>

<p><b>Please list the specific equality issues that may need to be addressed through consultation (and further research)?</b></p>
<ul style="list-style-type: none"> <li>• None</li> </ul>

## GATHERING EVIDENCE THROUGH COMMUNITY ENGAGEMENT

**INTERNAL STAKEHOLDER ENGAGEMENT:** Consulting & involving Other Government Departments, Staff, Agencies & NDPBs

<b>Does this policy affect the experiences of staff? How? What are their concerns?</b>	
<b>Staff</b>	No impact
<b>Staff Networks &amp; Associations</b>	No impact
<b>Trade Unions</b>	No impact

**How have you consulted, engaged and involved internal stakeholders in considering the impact of this proposal on other public policies and services?**

For example your policy may affect access to housing, education, health, employment services.

Internal staff had access to the consultation document through the Home Office intranet.

**What positive and adverse impacts were identified by your internal consultees? Did they provide any examples?**

The response rate to the consultation was low for internal stakeholders. There has however been wide discussion across policy and operational areas in the development of the charging policy.

No impacts identified

**Feedback the results of this internal consultation and use it as a basis for work on external consultation**

## **EXTERNAL CONSULTATION & INVOLVEMENT**

<b>How did your engagement exercise highlight positive and negative impacts on different communities?</b>	
<b>Voluntary Organisations</b>	Some respondents to the consultation exercise raised the issue of exempting voluntary organisations and charities from charges, or for them to be charged at a lower rate
<b>Race</b>	Some respondents to the consultation highlighted the potential impacts on poorer nations where local economies may price them out of applying to travel to the UK.
<b>Faith</b>	No impacts on faith
<b>Disability Rights</b>	No impacts on disability rights
<b>Gender</b>	No impacts on gender
<b>Gender Identity</b>	No impacts on gender identity
<b>Sexual Orientation</b>	No impacts on sexual orientation
<b>Age</b>	Some respondents to the consultation highlighted there could be a level of sensitivity in pricing which may impact different age groups – particularly the young.

**Feedback the results of your community engagement (i.e. involvement and consultation) to all participants including internal and external stakeholders**

## ASSESSMENT & ANALYSIS

**Does the EIA show a potential for differential impact on any group(s) if this proposal is introduced? If Yes, state briefly whether impact is adverse or positive and in what equality areas.**

While it is recognised that differing local economies across the world may create barriers of affordability for some applications to enter the UK it is believed that a more transparent charging policy will have a positive impact for applicants to the immigration system.

**What were the main findings of the engagement exercise and what weight should they carry?**

The main findings from all research showed there is price sensitivity across the world and travelling groups which need careful handling to maintain the UK's competitiveness. The findings carry great weight and have been used fully in the development of the charging policy. The impacts of the new fees will continue to be monitored following implementation.

**Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain group of people from obtaining services, or limit their participation in any aspect of public life?**

This charging policy does not cause unlawful direct or indirect discrimination. While it is recognised that differing local economies across the world will create a disparity in the affordability of application, the charging policy will not limit the participation in any aspect of public life for any visitor to UK

**How does the policy promote equality of opportunity?**

A more transparent charging policy results in more equitable pricing

**How does your policy promote good relations? How does this policy make it possible for different groups to work together, build bridges between parallel communities, or remove barriers that isolate groups and individuals from engaging in civic society more generally?**

The charging policy will continue to enable people to enter the UK to participate in all aspects of the community – family, education, employment, the arts, etc

**How can the policy be revised, or additional measures taken, in order for the policy to achieve its aims without risking any adverse impact?**

There are no specific ways to eradicate potentially adverse impacts, however ongoing monitoring of pricing will ensure that fees will remain competitive and meet changing global sensitivities.

**Are there any concerns from data gathering, consultation and analysis that have not been taken on board?**

Please justify and explain the reason for your decision.

None

## ENSURING ACCESS TO INFORMATION

### **How can you ensure that information used for this EIA is readily available in the future?**

(N.B. You will need to include this in your action plan)

- The response to the consultation and the proposed new fees were published on 7<sup>th</sup> March. The research analysis will also be made available. The response document can be found at:
- <http://www.ind.homeoffice.gov.uk/aboutus/newsarchive/chargingconsultationresponse>

### **How will you ensure your stakeholders continue to be involved/ engaged in shaping the development/ delivery of this policy?**

(N.B. You will need to include this in your action plan)

- The Fees Committee (a cross Government body) will meet quarterly to assess the impacts of the new fees
- The Charging Team will closely monitor the charging policy to assess ongoing pricing sensitivity
- The taskforces (education, employers and arts & entertainment) meet regularly and will kept up to date on the charging policy

### **How will you monitor this policy to ensure that the policy delivers the equality commitments required?**

(N.B. You will need to include this in your action plan)

- The Charging Team will closely monitor the charging policy to assess ongoing pricing sensitivity. The team will be looking at trends of applications, volume levels and levels of customer satisfaction for example. This information will be reported through the cross Government Fees Committee.
- Further research may be commissioned if necessary.

## ACTION PLAN

<b>Recommendations</b>	<b>Responsibility</b>	<b>Actions required</b>	<b>Success Indicators</b>	<b>Target Date</b>	<b>What progress has been made?</b>
Publication Arrangements	IND Charging Team	<ul style="list-style-type: none"> <li>• Publish RIA and EIA</li> <li>• Publish research</li> </ul>	Documents fully available to all stakeholders	April 07	<ul style="list-style-type: none"> <li>• Response to consultation and proposed new fees published</li> </ul>
Monitoring & Review Arrangements	IND Charging Team and UK Visas	<ul style="list-style-type: none"> <li>• Monthly review of charging policy</li> <li>• Commission further research if necessary</li> <li>• Fees Committee to meet quarterly to review impacts of fees</li> </ul>	Impacts of the new fees are known and monitored	Review Oct 07	<ul style="list-style-type: none"> <li>• Fees Committee set up and meets regularly</li> </ul>
Developing further IND charging initiatives	IND Charging Team	<ul style="list-style-type: none"> <li>• Review the areas that may be included within future charging strategies</li> <li>• Ensure appropriate equality impacts are assessed with development of policy</li> </ul>	A full charging strategy is in place and impacts are identified	Review Dec 07	<ul style="list-style-type: none"> <li>• REIA being developed</li> <li>• Fees Committee set up to assess impacts of fees</li> </ul>
Stakeholder engagement	IND Charging Team and UK Visas	<ul style="list-style-type: none"> <li>• Regular meetings of the Sector taskforces</li> <li>• Ongoing customer satisfaction survey</li> </ul>	Stakeholders kept informed of charging initiatives	Review Oct 07	<ul style="list-style-type: none"> <li>• Taskforces meet regularly</li> </ul>