



## HOME OFFICE EQUALITY IMPACT ASSESSMENT

<b>Directorate</b>	Identity Management Directorate
<b>Unit</b>	Biometric Strategy Team
<b>Date</b>	13 September 2010

### **Name of Policy/Guidance/Operational activity**

Rollout of Biometric Residence Permits (BRP) to in-country extensions of leave under Tiers 1 and 5 of Points Based System (PBS).

### **What are the aims, objectives & projected outcomes?**

To issue secure, reliable Biometric Residence Permits (BRP) to migrant workers subject to immigration control and extending their stay in the UK under Tiers 1 and 5 of the Points Based System (PBS), and their dependants. Tier 1 covers highly skilled workers, investors, entrepreneurs and post-study work. Tier 5 is for certain types of sponsored temporary workers whose entry helps to satisfy cultural, charitable, religious or international objectives. The issuing of BRPs will also help to phase out less secure documents which are used to evidence a person's immigration status and enable the UK to comply with its obligation under European Union legislation to issue a uniform residence permit to nationals of countries from outside the European Economic Area.

The UK Border Agency obtained powers in the UK Borders Act 2007 to enable the Secretary of State to make regulations which require third country foreign nationals subject to immigration control to apply for a BRP (known as a "Biometric Immigration Document" (BID) in the Act), and to register their biometric identifiers (facial image and fingerprints) for verification purposes.

The Immigration (Biometric Registration) (Amendment) Regulations 2010 are the next set of the regulations continuing the incremental rollout of the BRP by requiring third country foreign nationals to simultaneously apply for one when making their immigration application. The rollout began on 25 November 2008 to third country foreign nationals extending their stay as students or on the basis of marriage or partnership. From the 31 March 2009 several further categories of applicant were added, including all students applying for an extension under Tier 4 of PBS, and those seeking to transfer their conditions of leave into a passport or other such document. The most recent stage of the rollout was to skilled workers under PBS Tier 2. The current regulations will be the fourth such set of regulations laid before Parliament since the start of the scheme. All roll outs have been to those extending their stay in the UK by more than six months (non-EEA nationals).

The aim of this rollout is to provide more employees with a secure document that proves their entitlement to work in the UK and which enables employers and others to readily confirm the holder's entitlements.

## 1 SCOPE OF THE EIA (see Module 5 of the EIA e-Learning)

### 1.1 Scope of the EIA work

- *Ensure coverage of all equality strands and human rights*
- *Include any links to previous EIA or work delivered by another unit/Agency/Government Department. This may be particularly relevant where guidance is being produced that brings together several areas of policy.*
- *Identify beneficiaries/stakeholders.*
- *Include details of people involved doing the EIA*
- *Describe approach to data collection, stakeholder involvement, monitoring and review and publication*

#### **Background**

This Equality Impact Assessment (EIA) builds on the previous EIAs produced for the previous Immigration (Biometric Registration) Regulations 2008 which came into force on 25 November 2008; the Immigration (Biometric Registration) (Amendment) Regulations 2009 which came into effect on 31 March 2009; and the Immigration (Biometric Registration) (Amendment) (No.2) Regulations 2009 which came into effect on the 6 January 2010.

The EIA for the first regulations focused on the initial rollout of BRPs to foreign nationals in "student" and "marriage/partnership" categories. The second one built on the first. The last EIA took forward that work and considered the impact on those applying for further leave to stay in the UK under Tier 2 of the Points Based System, which includes skilled employees, intra-company transfers and ministers of religion.

The last EIA particularly focussed on potential positive and negative impacts the rollout may cause for workers applying under PBS Tier 2 from an equality perspective. As Tier 1 covers highly skilled workers, investors, entrepreneurs and post-study work and Tier 5 is for certain types of sponsored temporary worker whose entry helps to satisfy cultural, charitable, religious or international objectives, those affected by the rollout of the previous set of regulations are likely to be very similar to those affected by the current regulations. This EIA continues to build on the last EIA, widening the opportunity for input to further corporate partners and reviewing and adding to the previous action plan.

#### **Methodology:**

The EIA was undertaken through the use of questionnaires, discussions and meetings with internal and external stakeholders to assess the impact that this policy is likely to have upon those applying for further leave to stay in the UK under Tiers 1 and 5 of the Points Based System.

### **Consultation & Involvement:**

Annex C and Annex D detail the significant activity undertaken by the UK Border Agency with corporate partners and communications both since the early stages of the wider rollout and with many of the same contacts affected by the rollout to Tiers 1 and 5. This is particularly relevant to this EIA in terms of the work in advance of the rollout to Tier 2 applicants as the affected groups are similar. On this occasion the group of contacts invited to participate was widened and a further opportunity given to contacts within various groups representing employers, cultural, sporting and religious groups which were provided with background information about our rollout plans. In addition to this, the UK Border Agency continued with the work begun with A:Gender. Many other groups were contacted but only the above-mentioned has continued to engage with the UK Border Agency on a regular basis with respect to the particular concerns of the transgender community.

The customer base for the current regulations is again similar to that affected by the last stage of the rollout. For this reason we have referred to the results of a customer questionnaire circulated for the previous EIA, and which continued for some weeks after the most recent roll out.

### **1.2 Will there be a procurement exercise? No**

Consider whether there will be a **procurement** exercise, and once the EIA is completed:

- Ensure equality and diversity requirements are reflected into the procurement specification.
- Demonstrate how to monitor the successful inclusion of any equality and diversity requirements through delivery i.e. the specification must include something to be contained within the evaluations process and contractual monitoring

## **2 COLLECTING DATA** (see Module 6)

### **2.1 What relevant quantitative and qualitative data do you have?**

**This may include national research, surveys or reports, or research done by colleagues in similar areas of work.** Please list any evidence in the boxes below (complaints, satisfaction surveys, focus groups, questionnaires, meetings, email, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy/guidance/operational area.

<b>Race</b>	<p><i>Consider impact on people of different ethnic groups, nationalities, Gypsies, Travellers, languages etc</i></p> <p>When we sent out a pre-BRP pilot questionnaire in 2008 to corporate partners, responses stated that there was a perception that when BRPs were introduced, certain nationalities would be targeted (e.g. people from South Asia and Africa) by the police, potentially causing an adverse</p>
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	<p>impact on community relations and cohesion.</p> <p>Of the responses to the questionnaire circulated to representative organisations for groups affected by the rollout to Tiers 1 and 5 of PBS, nearly all envisaged that no particular racial groups would be either beneficially or adversely affected.</p> <p>However, one respondent was concerned that “requiring BRP for short term placements may mean that these individuals [from different ethnic groups from a variety of countries] were unable to pursue the opportunity of gaining work experience in the UK.</p> <p>Another respondent noted “It is necessary to look at the range of nationalities who apply under the tiers in question”. They stated that any general adverse effects such as any increase in processing times as a result of increased volumes required to enrol biometrics would have the greatest effect on those nationalities that make most use of the particular tiers. They also stated “The Biometric Identity Document, where it is required to be produced, marks out the holder as a non-EEA national, which in turn could reinforce stereotypes of certain migrant groups as needing to identify themselves as such and to always be able to show their permission to stay in the UK.” They suggested that the scrapping of the national ID card scheme now marks out migrants as the only group in possession of such cards and thus marks them as different from British nationals. A similar possibility of perceived inequality was noted by another respondent, although their comment was more balanced, “Some may view this as divisive, ie. that only immigrants have to carry this...others however may be reassured that there is no illegality”.</p> <p>Crucially, an analysis of 1400 customers responding to a questionnaire circulated to applicants applying for a BRP in autumn/winter 2009-2010 showed the vast majority were made up of nationalities from South Asia and Africa and indicated that they understood why they were providing their biometrics and were content with the process and the requirement to have a BRP.</p>
<p><b>Religion/ belief &amp; non belief</b></p>	<p><i>Consider impact on people with different religions or beliefs or none.</i></p> <p>Perception expressed by corporate partners during previous EIAs in relation to BRPs that young men were often targeted by the police, particularly young Muslim men, and the introduction of BRPs would make this situation worse.</p> <p>We have not had any specific feedback from customers to indicate that this is the case. Again, in response to the</p>

	<p>customer survey noted above, by far the majority of young Muslim men indicated that they understood why they were providing their biometrics and were content with the process and the requirement to have a BRP.</p> <p>Comments from respondents to the questionnaire sent to corporate partners in summer 2010 for the most part indicated no adverse or beneficial concerns in this area. One respondent indicated that there would need to be consideration of the appointment day / time for giving biometrics. Another organisation responded that consideration of religious needs be noted in the process for digital photo capturing, for example in respect of head-covering. The same respondent also stated “We do not identify any ways in which the taking of biometrics from those applying for further leave under Tiers 1 and 5 of the Points Based system will give rise to any new beneficial or adverse effects as a result of religious faith or belief that are not already encountered in the taking of biometrics from groups currently required to give them.”</p>
<p><b>Disability</b></p>	<p><i>Consider environmental, social and attitudinal barriers.</i></p> <p>The Home Office Disability Support Network previously advised of the potential adverse impact on disabled people when BRPs were introduced unless:-</p> <ul style="list-style-type: none"> <li>• suitable arrangements were made for the disabled to enrol their biometrics at the various locations;</li> <li>• we considered what to do about those unable to attend due to their particular disability;</li> <li>• we considered that fingerprints would be difficult to obtain from those with upper limb deformities;</li> <li>• we considered what to do about persons who come under the Mental Health Act.</li> </ul> <p>Although a significant number of people failed to indicate their circumstances on this point within the customer questionnaire, of the 15 people who stated they had a disability, none of them have raised any concerns about the process.</p> <p>Most representative groups who responded to the questionnaire circulated in August 2010 envisaged no impact for this group as long as there was suitable access.</p> <p>Two respondents wished to see more information on the (non-chargeable) mobile enrolment service available to those who are physically unable to travel. One of these respondents considered there is a need to take account of those who find travelling difficult because of a disability but are not physically unable to travel. They stated that such</p>

	<p>people may also have difficulty with queuing or waiting for long periods, which they envisaged that the rollout to further categories could lead to.</p> <p>Another respondent noted that restricted vision and hearing should be considered.</p>
<b>Gender</b>	<p><i>Consider impact on men and women; working arrangements e.g. part-time, shift working, caring responsibilities.</i></p> <p>One of the organisations contacted in summer 2010 mentioned the financial impact of the fee for a change of details which they stated would be more likely to have an adverse effect on females as a result of taking a married name.</p>
<b>Gender Identity</b>	<p><i>Consider impact on transsexual and transgender people including bullying, harassment and discrimination issues not least ensuring privacy of data to avoid disclosure of gender history.</i></p> <p>Gender Identity and other groups have previously raised concerns that a person's gender on the BRP would be "fixed" thus potentially causing an adverse impact on the individual who subsequently changed gender.</p> <p>One of the respondents to the questionnaire that was circulated to interested parties in August 2010 commented that there may be a problem if the gender on the application documentation, such as passport, differed from that previously provided and asked how this would be handled.</p> <p>Another respondent raised the impact of changing permit details (as noted above for women), as being more likely to have an adverse effect also on transgender individuals.</p>
<b>Sexual Orientation</b>	<p><i>Consider impact on bisexual, gay, heterosexual or lesbian people.</i></p> <p>In response to the question on sexual orientation posed in the UK Border Agency's customer survey in autumn/winter 2009, a large number of people (roughly a third) either left this blank or indicated that they preferred not to say. However, of those who identified as either gay men or women or bisexual, the great majority indicated that they were content with the application and enrolment process. Less than one per cent of this group indicated that the process was not clear in some way. The isolated scores were not indicative that there was a problem for this group in comparison with similar isolated scores across the board.</p> <p>None of the groups responding to the questionnaire circulated to corporate partners in summer 2010 identified either any positive or negative effects to attribute to this</p>

	<p>group as a result of the current proposed policy.</p>
<b>Age</b>	<p><i>Consider impact on people of different ages, e.g. young/old.</i></p> <p>A concern has previously been raised that the elderly may feel uncomfortable being made to carry a BRP, potentially causing an adverse impact.</p> <p>We have no evidence to either support or refute this. However, our findings on the analysis of the responses given to the customer questionnaire across age groups did not indicate any particular concerns. All but a small fraction of all respondents across the board indicated that they were content with the biometric enrolment process.</p> <p>A concern was raised by one of the corporate partners responding to the questionnaire that any increase in the numbers required to enrol biometrics could lead to “long delays” which children and the elderly may find particularly difficult.</p>
<b>Welfare of Children [THE UK BORDER AGENCY ONLY]</b>	<p><i>[This is a specific UKBA Duty. Other areas may consider this particular impact above. ]</i></p> <p><i>Consider the impact on children and also the need to safeguard and promote welfare of children.</i></p> <p>Previously concerns were that child friendly facilities and child protection workers be made available, and that the whole process was carried out in a sensitive manner.</p> <p>One of the corporate partners responding to our questionnaire suggested that “if the purpose of providing biometric data is to help the UKBA identify applicants and their immigration status...biometric data should be enrolled more frequently for children.”</p>
<b>Socio-economic</b>	<p><i>Consider impact of strategic decisions e.g. high level priorities, funding etc on different social and economic groups. E.g. inequalities arising from social class, family background, where people were born, where they live, income, barriers to social mobility.</i></p> <p>The policy assists with the UK Border Agency’s priority to secure our Borders and prevent abuse of the immigration rules. It helps third country foreign nationals demonstrate their entitlements and employers check right to work. There are no perceived socio-economic inequalities.</p>

<b>Human Rights</b>	<p><i>Consider decisions relating to the way people are treated, absence of torture, inhuman and degrading treatment, right to respect for private and family life, freedom of expression, respect for cultural and religious requirements, provision of culturally appropriate facilities, access to appropriate communication aids, access to information, rights to representation, discrimination in employment or service outcomes. (see Module 2)</i></p> <p>A Privacy Impact Assessment was conducted prior to the initial rollout of BRPs.</p> <p>The enrolment process is quick and clean, there is no wet ink involved, and the enrolling officer does not need to touch the applicant to facilitate the enrolment. Photographs are taken which reveal the face but the process of taking the photograph reflects cultural sensitivities. Special arrangements may be made for those who require them by virtue of disability or illness.</p> <p>A significant majority of 1400 respondents to the customer questionnaire circulated in autumn/winter 2009 indicated positive responses to the process of applying for a BRP and providing biometrics with only a small fraction providing any negative feedback.</p>
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## 2.2 What are the overall trends/patterns in this data?

*Consider:*

- *Disproportionality;*
- *Regional variations;*
- *Different levels of access, needs or experiences;*
- *Combined impacts;*
- *Barriers to engagement.*

Some perception of discrimination on the grounds of ethnicity.

Some perception of discrimination on the grounds of religion.

Some perception of discrimination on the grounds of age, disability and access.

Impacts on transgender groups, including the financial impact of applying for an updated document (which could also apply disproportionately to women when marrying).

A common theme in response to the questionnaire sent to corporate partners and representative groups was should be growth in readily available and accessible biometric enrolment facilities in line with the expansion of the scheme.

BRP customers are largely content with the application and enrolment process.

Employers welcome the document.

### **2.3 Please list the specific equality issues and data gaps that may need to be addressed through consultation and/or further research?**

*For example, you may need to ensure qualitative data groups include stakeholders with respect to this policy/guidance/activity.*

**NB. Include any recommendations in your action plan.**

The issue of gender being a 'fixed' data item on the BRP and the potential adverse affect this may have on transgender groups is an area which continues to require further consideration and research. Work has been conducted in conjunction with the Passport Service and other Government Departments, Gender Identity Research and Education Society (GIREs), Press for Change, and other stakeholders representing the transgender community and A:Gender, a pan-Civil Service transgender organisation, and work continues with representative groups to ensure up to date and comprehensive guidance is available to UK Border Agency employees required to assess applications and to facilitate border entry.

With increased numbers required to enrol biometrics, one theme was availability of suitable appointments within close proximity to the applicant, particularly where age or disability may be a factor. We are continuing to look at further opportunities to increase biometric enrolment capacity as the numbers of those required to enrol biometrics increases. 17 Crown Post Offices are now available offering biometric enrolment for adult postal applicants as part of a pilot, providing more opportunities for enrolment services that many customers find more convenient. We are also currently discussing a date for when children will be able to be enrolled at these Post Offices. These add to 11 – Disability Discrimination Act (DDA) compliant - Home Office Biometric Enrolment Centres. A mobile biometric enrolment service has been established and is available on a non-chargeable basis for those physically unable to travel, and a chargeable super premium service is also in operation, where the UK Border Agency visits the applicant at a time and location of their choosing to enrol their biometrics and a decision is subsequently made within 24 hours of that appointment.

Further options are being considered for expansion, including increasing the number of Post Offices participating in the pilot and approaching the market for provision of front office services, so that the recording of biometric features for postal applicants is undertaken by a commercial partner.

It is recommended that engagement with groups representing disability and age on the subject of access to enrolment facilities continues as the above plans are developed. It is also recommended that the uptake and operation of the mobile biometric enrolment service be closely monitored to ensure it meets the needs of our customer base.

Now that the numbers of BRPs in circulation have increased to more than 275,000, further research on the experiences of those required to have a BRP and whether they have been either beneficial or adverse documents to hold to demonstrate the right to live, work and receive other benefits to which they are entitled in the UK would be useful. This would be particularly to ascertain whether the perception that there may be discrimination, for instance on

account of ethnicity, religion or gender identity (transgender) is well founded. Although there is evidence from customers regarding the application process which does not support this, the specific issue raised regarding the perceived targeting of particular groups to have and produce the BRP would benefit from customer feedback.

### 3 INVOLVING AND CONSULTING STAKEHOLDERS

(see Module 7)

In this section, describe the data you have gathered through stakeholder involvement and engagement.

#### **3.1 Internal consultation and involvement:** e.g. with Other Government Departments, Staff (including support groups), Agencies & NDPBs

*In planning, carrying out and recording internal consultation and involvement, you may wish to consider the following:*

- *Does this initiative affect the experiences of staff? How? What are their concerns?*
- *How have you consulted, engaged and involved internal corporate partners in considering the impact of this proposal on other public policies and services?*
- *What forms of consultation, engagement and involvement have been most effective?*
- *What positive and adverse impacts were identified by your internal corporate partners?*

Throughout the rollout of the wider scheme, the UK Border Agency has consulted with its Legal Adviser Branch, representative groups from the UK Border Agency, Home Office and Civil Service wide equality strands, the DVLA, DWP, MOJ, BERR (now BIS), NI Court Service & Scottish Executive Justice Dept as part of its work to develop the BRP policy. As the rollout of the wider scheme has progressed our corporate partners are increasingly familiar with the aims of the policy and engagement is more generally in terms of regular updates, particularly as the customers affected by this stage of the rollout are similar to those affected by the previous rollout to PBS Tier 2.

Internal training and guidance has been developed with the staff within the UK Border Agency to ensure that they are aware of the reason for BRP policies and enable them to recognise the different groups of people that they are dealing with and their diversity issues.

A positive impact from the engagement with internal consultees enabled development of sound policy for example around how to deal with those who were unable to give their biometrics (“Exemptions and Exceptions policy”), and in developing policy around the handling of applications from transgender customers.

Engagement with internal consultees has also confirmed that the secure reliable BRP is welcomed by employers who are required to undertake right to work checks and facilitates employment for foreign nationals entitled to undertake it.

Research evidence gathered previously during EIAs conducted for earlier stages of the BRP rollout suggests that legal economic migrants to the UK have concerns about the security of their identity. There is also a risk that other EU countries might refuse entry to persons awarded UK residence if they do not have a biometric document to prove they have a right of return to the UK. The BRP helps address concerns regarding security of identity by providing a secure biometric document which links to the holder and which also acts as proof that the migrant has a right of return to the UK. The BRP improves the

capability of legal migrants to be able to move within the EU and further afield.

***Feedback what you plan to do as a result of this internal consultation and use it as a basis for work on external consultation.***

We will continue to engage with staff and internal groups to ensure operational training and guidance remains effective.

Any survey of how those who hold a BRP find it adversely or beneficially affects them will consider requesting information on the previously raised points about security of identity and ease of movement within the UK and beyond, along with ease of demonstrating right to work or access other privileges.

**3.2 External consultation and involvement: strand specific organisations e.g. charities, local community groups, third sector**

*In planning, carrying out and recording external consultation and involvement, you may wish to consider the following:*

- *How did you ensure that different external corporate partners and community groups had access to your public consultation process?*
- *Did consultation show that the proposal could present social or physical barriers to any communities or groups?*
- *What positive impacts were identified during consultation?*
- *Who have you engaged and involved in developing your proposals? When and how was this done? e.g. focus groups, panels, project board etc*
- *What opportunities for positive impact were identified during this engagement? E.g. opportunities to eliminate unlawful discrimination, promote equal opportunity and good community relations.*
- *What concerns were identified during this engagement exercise? Describe potential impact, mitigating existing disproportionality etc*
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***Feedback what you plan to do as a result of the engagement to all participants including internal and external corporate partners.***

Corporate partner events and communications throughout 2008 to 2010 (see Annex C and D) have raised awareness and understanding about the BRP and ensured partners are updated with the latest developments in the roll out. The key audiences were:

- business - as employers and providers of services
- education sector
- foreign nationals
- media
- the public
- Member of Parliament caseworkers
- legal organisations
- sports representatives
- healthcare
- faith groups

- airline industry

With the rollout to PBS Tiers 1 and 5 engagement has continued through regular forums such as Education, Employer and Arts and Entertainment Taskforces, regular meetings with Sports Groups and The Business Advisory Panel, and through the questionnaire asking for feedback on impacts on groups affected which was sent to representatives of the sectors noted above as well as faith groups (see Annex A and B to EIA report).

Positive impacts confirmed by external engagement are that the increasing numbers of BRPs make it easier for employers to check right to work and for migrants to prove it, and the BRP is a more convenient document to use to demonstrate entitlement than a passport.

Perception of discrimination on the grounds of ethnicity and/or religion:  
Clarification about the purpose of the BRP, the legislation from which it comes and the effect of the scrapping of the National Identity Service for British Nationals has been reinforced through national press and media, regular forums and communications to corporate partners and web stories. As a result of the responses to the questionnaire returned by corporate partners and the continuance of evidence that the BRP continues to be associated with the National Identity Service and the effect that this has on a perception that migrants are “singled out” to hold/carry a card, it is recommended that the communications in relation to this stage of the rollout reinforce clarification of the purpose and legislative basis for the BRP.

Reassurance has previously been offered through national communications, in guidance to police forces and at workshops that the BRP does not need to be carried at all times. Fact sheets have been provided to police forces across the country setting out the purpose and usage of the BRP.

Perception of discrimination on the grounds of age, disability and access:  
A common theme in response to the questionnaire sent to corporate partners and representative groups was should be growth in readily available and accessible biometric enrolment facilities in line with the expansion of the scheme, and that this applied generally to all those required to enrol biometrics but may have a particularly adverse impact on those with disabilities or mobility problems, the elderly or very young, and those with caring responsibilities. It is recommended that communications in advance of the rollout to new categories are clear about the enrolment options, including the spread of locations available and the non-chargeable service, and as plans for increasing biometric enrolment opportunities develop engagement with representative groups for these equality strands continues.

Impacts on transgender groups, including the financial impact of applying for an updated document (which could also apply disproportionately to women when marrying): Engagement is ongoing with representative groups in respect of transgender issues.

## 4 ASSESSING IMPACT (see Module 8)

In this section please record your assessment and analysis of the evidence. This is a key element of the EIA process as it explains how you reached your conclusions, decided on priorities, identified actions and any necessary mitigation.

### 4.1 Assessment of the impact

*In assessing and analysing impact of your proposals consider the following:*

- Does the result of this EIA work show a potential for differential impact? If yes, state whether impact is adverse or positive and in what equality areas [response to follow from consultation].*
- Do the proposals have the potential to cause unlawful discrimination? E.g. could the proposals exclude certain groups of people from obtaining services or limit their participation in any aspect of public life?*
- How will you mitigate any negative impacts this proposal may have?*
- How does the proposal promote equality of opportunity?*
- How does the proposal promote good community relations?*
- In the light of consultation and data gathering, what changes will you make to the policy?*
- Are there any concerns from consultation and data gathering that have not been taken on board? (Please justify and explain the reason for your decision.)*

The rollout is based on those employed as highly skilled workers, investors, entrepreneurs and for post-study work, as well as for certain types of sponsored temporary worker whose entry helps to satisfy cultural, charitable, religious or international objectives. Preliminary analysis suggests that this will effect upwards of 75,000 people each year (estimates).

There is no indication that any particular community would be disproportionately affected. The proposals should have a positive impact for those subject to immigration control and lawfully residing within the UK. Given the UK Border Agency has already rolled out BRPs to other categories, including to skilled workers under Tier 2 of the Points Based System and students under Tier 4, as well as spouses, civil partners and unmarried partners, it is unlikely to disadvantage this group in terms of accessing their entitlements in the UK, particularly as those affected by the rollout of the previous set of regulations are likely to be very similar to those affected by the current regulations. Many employers have indicated that it makes their checks easier to undertake which should make it easier for an employee to show that s/he is entitled to work in the UK.

Concerns have been raised about the impact on particular nationalities applying under the tiers in question. The rollout has not been on a nationality basis but on immigration category type. However, results from a customer satisfaction survey regarding the process of applying for a BRP were extremely positive and by far the majority of respondents identified themselves as coming from Africa and South Asia.

Perceptions have been reported around the “singling out” of migrants to hold

(and/or carry) a document which British nationals will not hold. However, this is not supported by customer feedback on the requirement to apply for a BRP and in large part arises from the presentation of the BRP as an identity card under the former government. The BRP will replace the vignette (or sticker) which is currently placed in the passports of those granted an extension of their stay in the UK under Tiers 1 and 5. The BRP is a more secure and convenient way of providing proof that a migrant has the right to live, work and access any other benefits of being in the UK. Positive impacts confirmed by external engagement are that the increasing numbers of BRPs make it easier for employers to check right to work and for migrants to prove their right.

The regulations will promote equality of opportunity by extending the rollout of a document demonstrating entitlement to work to further PBS Tiers of migrant workers, and assists migrants in obtaining employment and services to which they are entitled, rather than excluding them. Mitigation against the perception that migrants are being “singled out” will be taken by reinforcing this message through engagement and communications.

However, concerns were raised about the biometric enrolment process requiring business people to take time out of work and pressure on the system as a result of the increased volumes of applicants. This affects foreign national workers who are required to apply for a BRP. The UK Border Agency has taken steps to mitigate against such concerns by increasing the number of Home Office centres that enrol biometrics, the launch of the Post Office enrolment pilot scheme, which enables enrolment during participating branches’ usual opening hours including Saturdays, and a mobile service which may be used in a variety of ways, e.g. for those physically unable to attend a centre and for those wanting an exclusive service. The UK Border Agency is also planning to expand the options for enrolment in line with the increased need by increasing the number of Post Offices participating in the pilot and looking to the market to provide third party enrolment in due course.

The growth of readily available and accessible biometric enrolment facilities in line with the expansion of the scheme has also been noted within the context of the perception of discrimination on the grounds of age, disability and access. The plans to increase options for enrolment through expansion of the Post Office pilot and opening the market to other third party providers will only assist those who may be more challenged by the requirement to provide biometrics. We are also working with Post Office Ltd to agree a date for when dependants can use the service. The growth of enrolment facilities throughout the rollout to date, along with these future plans evidences the UK Border Agency’s commitment to providing a suitable service, however, any development of expansion plans will include engagement with representative groups to mitigate against any potential discrimination. The UK Border Agency’s ‘Exemptions and Exceptions’ policy which was developed as a result of feedback from previous EIAs, also exists to address these concerns, as does the provision of a non-chargeable mobile biometric enrolment service.

Impacts on transgender groups continue to be mitigated through close working with representative groups to implement sound and up to date practical

guidance.

The policy promotes good relations by giving more foreign nationals who are lawfully in the UK the ability to demonstrate their legal status which in turn will build confidence in the system. Over time the policy will enable employers to be more confident of the documents provided by foreign nationals subject to immigration control when seeking employment and will facilitate making checks on employees. The uniform format of the document will build employer confidence in the holder's entitlements and the security of the document.

**Now complete the report and Action Plan.**

## 5 REPORT, ACTION PLANNING AND SIGN OFF *(see Module 9)*

### 5.1 EIA Report

The EIA Report is a concise summary of the results of the full EIA. A template is provided at Annex A.

### 5.2 Sign-off

**Now submit your EIA and related evidence for clearance**

<b>Date of completion of EIA</b>	10 September 2010
<b>Compiled by</b>	Eleanor West
<b>SCS sign-off</b>	Jeremy Oppenheim
<i>I have read the Equality Impact Assessment and I am satisfied that all available evidence has been accurately assessed for its impact on equality strands. Mitigations, where appropriate, have been identified and actioned accordingly.</i>	
<b>Date of publication of EIA Report</b>	
<b>Review date</b>	

### 5.2 Publication and Review *(see Module 10)*

Ensure that the EIA Report including the Action Plan are published alongside your policy/guidance/operational activity.

**IMPORTANT - Review, revise and update annually!**

# **EQUALITY IMPACT ASSESSMENT REPORT FOR THE ROLLOUT OF BIOMETRIC RESIDENCE PERMITS (BRP) TO EXTENSIONS OF LEAVE UNDER TIERS 1 AND 5 OF POINTS BASED SYSTEM (PBS)**

## **BACKGROUND**

The UK Border Agency obtained powers in the UK Borders Act 2007 to enable the Secretary of State to make regulations which require foreign nationals subject to immigration control to apply for a Biometric Residence Permit (known as a “Biometric Immigration Document” (BID) in the Act), and to register their biometric identifiers (facial image and fingerprints) for verification purposes.

The Immigration (Biometric Registration) (Amendment) Regulations 2010 are the next set of the regulations continuing the incremental rollout of the BRP by requiring migrants to simultaneously apply for one when making their immigration application. The rollout began on 25 November 2008 to migrants extending their stay as students or on the basis of marriage or partnership. From the 31 March 2009 several further categories of applicant were added, including all students applying for an extension under Tier 4 of the Points Based System for migration (PBS), and those seeking to transfer their conditions of leave into a passport or other such document. The most recent stage of the rollout was to skilled workers under PBS Tier 2.

The current regulations aim to roll the BRP out to applicants extending their stay in the UK under Tiers 1 and 5 of PBS and will be the fourth such set of regulations laid before Parliament since the start of the scheme. All roll outs have been to those extending their stay in the UK by more than six months (non-EEA nationals). The aim of this rollout is to provide more employees with a secure document that proves their entitlement to work in the UK and which enables employers and others to readily confirm the holder’s entitlements and to phase out less secure evidence of a person’s immigration status. This enables the UK to comply with its obligation under European legislation to issue a uniform residence permit to nationals of countries from outside the European Economic Area.

Tier 1 covers highly skilled workers, investors, entrepreneurs and post-study work. Tier 5 is for certain types of sponsored temporary worker whose entry helps to satisfy cultural, charitable, religious or international objectives.

## **SCOPING THE EIA**

This Equality Impact Assessment (EIA) builds on the previous EIAs produced for the previous Immigration (Biometric Registration) Regulations 2008 which came into force on 25 November 2008; the Immigration (Biometric Registration) (Amendment) Regulations 2009 which came into effect on 31 March 2009; and the Immigration (Biometric Registration) (Amendment) (No.2) Regulations 2009 which came into effect on the 6 January 2010.

The EIA for the first regulations focused on the initial rollout of BRPs to foreign nationals in “student” and “marriage/partnership” categories. The second one built on the first. The last EIA took forward that work and considered the impact on those applying for further leave to stay in the UK under Tier 2 of the Points Based System, which includes skilled employees, intra-company transfers and ministers of religion.

The last EIA particularly focussed on potential positive and negative impacts the rollout may cause for workers applying under PBS Tier 2 from an equality perspective. As Tier 1 covers highly skilled workers, investors, entrepreneurs and post-study work and Tier 5 is for certain types of sponsored temporary worker whose entry helps to satisfy cultural, charitable, religious or international objectives, those affected by the rollout of the previous set of regulations are likely to be very similar to those affected by the current regulations. This EIA continues to build on the last EIA, widening the opportunity for input to further corporate partners and reviewing and adding to the previous action plan.

## **COLLECTING DATA**

The EIA was undertaken through the use of questionnaires, discussions and meetings with internal and external corporate partners to assess the impact that this policy is likely to have upon those applying for further leave to stay in the UK under Tiers 1 and 5 of the Points Based System.

## **INVOLVING AND CONSULTING CORPORATE PARTNERS**

Annex A is a copy of the questionnaire sent to corporate partners and Annex B shows the list of those organisations to whom it was sent. Annex C and Annex D detail the significant activity undertaken by the UK Border Agency with corporate partners and communications both since the early stages of the wider rollout and with many of the same contacts affected by the rollout to Tiers 1 and 5. This is particularly relevant to this EIA in terms of the work in advance of the rollout to Tier 2 applicants as the affected groups are similar. On this occasion the group of contacts invited to participate was widened and a further opportunity given to contacts within various groups representing employers, cultural, sporting and religious groups which were provided with background information about our rollout plans. In addition to this, the UK Border Agency continued with the work begun with A:Gender. Many other groups were contacted but only the above-mentioned has continued to engage with the UK Border Agency on a regular basis with respect to the particular concerns of the transgender community.

The customer base for the current regulations is again similar to that affected by the last stage of the rollout. For this reason we have referred to the results of a customer questionnaire circulated for the previous EIA, and which continued for some weeks after the most recent roll out.

## **ASSESSING IMPACT**

### **Customer Satisfaction Survey – Biometric enrolment at Home Office Biometric Enrolment Centres**

Key findings from an analysis of 1400 customers responding to a questionnaire circulated to applicants applying for a BRP in autumn/winter 2009-2010 showed:

- a significant majority of the 1400 respondents indicated positive responses to the process of applying for a BRP and providing biometrics with only a small fraction providing any negative feedback;
- the vast majority were made up of nationalities from South Asia and Africa and indicated that they understood why they were providing their biometrics and were content with the process and the requirement to have a BRP (nationality/race has been identified in previous EIAs as having potential for discrimination by the requirement to have a card);
- by far the majority of young Muslim men indicated that they understood why they were providing their biometrics and were content with the process and the requirement to have a BRP (this group have been identified in previous EIAs as potentially discriminated against by the requirement to have a card);
- although a significant number of people failed to indicate their circumstances on this point within the customer questionnaire, of the 15 people who stated they had a disability, none of them raised any concerns about the process;
- in response to the question on sexual orientation posed in the UK Border Agency's customer survey in autumn/winter 2009, a large number of people (roughly a third) either left this blank or indicated that they preferred not to say. However, of those who identified as either gay men or women or bisexual, the great majority indicated that they were content with the application and enrolment process. Less than one per cent of this group indicated that the process was not clear in some way. The isolated scores were not indicative that there was a problem for this group in comparison with similar isolated scores across the board;
- our findings on the analysis of the responses given to the customer questionnaire across age groups did not indicate any particular concerns. Again, all but a small fraction of all respondents across the board indicated that they were content with the biometric enrolment process;
- as any negative comments were both rare and isolated, there were no trends identifying that any equality strands were adversely affected by the requirement to enrol biometrics.

### **Questionnaire circulated to corporate partners and representative groups**

The majority of respondents to the questionnaire (Annex A) circulated to the corporate partners and representative groups listed at Annex B stated that they had no concerns or envisaged no adverse impact as a result of the current proposal to rollout BRPs to foreign nationals from outside the EEA extending their stay in the UK for more than six months under Tiers 1 or 5 of PBS. Positive impacts identified were:

- Makes it easier for employers to distinguish who is allowed to work here
- Safer than carrying around a passport

- Natural progression of technology

Key responses from corporate partners and representative groups that raised concerns are as follows, along with the UK Border Agency's response:

Concern raised	The UK Border Agency's (UKBA) response
<p>1. General - Processing times will increase when the volume of applications increases because Tier 1 and Tier 5 applicants will also need to enrol biometrics, which creates a barrier to working in the UK. (Immigration Law Practitioners' Service ILPA, but also a concern expressed by British Universities North America Club BUNAC,)</p>	<p>Throughout the rollout of the BRP to date the UK Border Agency has increased the capacity of enrolment facilities and options as the volumes required to enrol biometrics have increased.</p> <p>Upon receipt of a postal application the UK Border Agency issue a letter to advise the applicant that they must provide their biometrics within 15 working days. Applicants are able to either use the walk-in service at one of 17 Crown Post Offices across the UK as part of a pilot, or book an appointment at one of 11 Home Office Biometric Enrolment Offices where there are sufficient appointments available to book immediate appointments and demand on all of the biometric enrolment offices is monitored to ensure there is sufficient capacity to meet demand, even in peak periods.</p> <p>It is possible to book premium (24 hour decision) appointments up to six weeks in advance. We are working towards improving the service offered by the UK Border Agency's Public Enquiry Offices and increasing capacity. We have also introduced a representatives service and in emergency situations we will provide a walk-in service to applicants from our PEO in Croydon.</p> <p>As part of our attempts to increase capacity, we are working to expand the pilot of biometric enrolment at Post Offices to another eight branches, as well as approaching the market for the provision of front office enrolment services, so that the recording of biometric features is undertaken by a commercial partner and enabling Public Enquiry Offices to focus on provision of additional premium appointments.</p> <p>The UK Border Agency also operates a super premium service in which we will visit the applicant to record his/her biometric features at a time and location of the applicant's choosing, and a decision is made within 24 hours of that enrolment.</p> <p>This service is chargeable but there is also a non-chargeable service for those who are physically unable to travel.</p>
<p>2. General – The requirement for a BRP, because it adds an extra stage to the application process, will adversely affect frequent business travellers: Small businesses, investors, entrepreneurs and self-employed individuals,</p>	<p>Feedback from businesses and employers has generally been positive in response to the introduction of the BRP, which makes checking the right to work easier.</p> <p>The processing times involved in the BRP system do not add significantly to the processing times of immigration applications. However, as well as the response to the previous general point 1 above, as part of our review of the front office biometric enrolment service we will be looking further</p>

<p>businesses run by or employing significant numbers of staff from ethnic minorities. (ILPA)</p>	<p>improve the service offered to applicants, including increasing the availability of enrolment offices and faster processing times.</p>
<p>3. General – the range of locations at which biometric data can be enrolled is limited. This will have a particularly adverse effect on: Those remote from the locations at which biometric enrolment data can be taken, those based in rural areas, those with mobility problems making travel difficult; those with caring responsibilities (our understanding is that more carers are women than men). (ILPA)</p>	<p>The responses to points 1 and 2 above set out the UK Border Agency’s current biometric enrolment service and plans for expansion. The strategy for rolling out biometric enrolment facilities has always been demand led and is under constant review. Following the Post Office enrolment pilot we will assess how well it has worked and if it has achieved the required objectives. The pilot has so far been successful and we hope to subsequently to run a procurement exercise in order for a commercial partner to operate the front office biometric enrolment service. One requirement of this would be that the organisation is able to provide sufficient services to cope with both demand and geographical issues.</p> <p>The current arrangements for biometric enrolment include consideration of eligibility for a non-chargeable biometric enrolment service on request by those unable to travel, and a chargeable mobile service for those willing to pay for an exclusive service. Appointments at enrolment centres and opening hours of Post Offices participating in the pilot are quite flexible and offer a range of times and some weekend opening hours. As such there are varied options for all of our customers.</p>
<p>4. General – Employers with restricted capacity for HR administration may find it difficult to manage the additional requirements of BRP. That is, smaller businesses are likely to be adversely affected. (The Law Society)</p>	<p>The introduction of BRPs to further categories of applicant does not require employers to make any changes to the checks they currently undertake for right to work checks. The BRP replaces existing documentation and actually reduces the administrative burden on employers and others required to check right to work or other entitlements in the UK, as feedback from corporate partners has confirmed.</p> <p>We continue to recommend that document checks are conducted on all prospective employees. This establishes a statutory excuse against liability for payment of a civil penalty for employing illegal migrants. BRPs are included on the list of documents employers can check when establishing an entitlement to work. To make it easier for employers we require foreign nationals with limited leave, where they have been issued with a BRP, to show their document to employers once a year.</p>
<p>5. Race – It is necessary to look at the range of nationalities who apply under the tiers in question. Any general adverse effects will have the greatest effect on those nationalities that make</p>	<p>The rollout strategy for the wider scheme has been on the basis of application type, not nationality and the UK Border Agency have already worked extensively with the Commission for Racial Equality (CRE) who are satisfied that the rollout is not in breach of CRE requirements. The rollout of Tiers 1 and 5 should not have an effect on the range of nationalities applying under those tiers. It is also notable that, of 1400 respondents to</p>

<p>most use of the particular tiers, giving rise to risks of indirect discrimination. (ILPA, with the British Council also requesting clarification on whether applications are dealt with on the basis of nationality)</p>	<p>a questionnaire circulated to customers during autumn/winter 2009-2010 the vast majority were made up of nationalities from South Asia and Africa and gave positive responses to the process of applying for a BRP and providing biometrics with only a small fraction across the board providing any negative feedback.</p>
<p>6. Race – Tier 5 is used to offer placements to students, interns or foreign lawyers from different ethnic groups from a variety of countries. Requiring BRP for short-term placements may mean that these individuals are not able to pursue the opportunity of gaining work experience in the UK. The Lawyers for Africa Programme may be affected. (The Law Society)</p>	<p>Only applicants extending their stay in the UK for more than six months are affected by this proposal. It is not clear nor is any evidence provided as to why these groups should be affected in this way. The requirement to apply for a BRP will also affect migrants staying in other EU member-state countries.</p>
<p>7. Gender and Gender Identity (transgender) – the impact of changing permit details will be dependant on whether there is a fee for the change and the fee amount. This is more likely to have an adverse effect on transgender individuals and females wishing to record a name change after marriage for example. (Archbishops council of the Church of England)</p>	<p>In order for the holder to benefit from the advantages of having a BRP it is important that the details on it and those held by the UK Border Agency are kept up to date. Customers are required to apply for a replacement document if they change their name, for example because of marriage or by deed poll, if they change gender legally or permanently, if they change their nationality, or if their facial appearance changes significantly.</p> <p>The fee for a replacement BRP application is currently £30 and is set to recover the administrative costs of this service. We consider this to be a proportionate cost to recoup from the BRP holder in the event that such a change occurs during the validity period of the BRP.</p>
<p>8. Gender Identity (transgender) – concern around how applications which may rely on documentation which differs from an acquired gender would be handled. (British Council)</p>	<p>The UK Border Agency has worked closely with the Passport Service and other Government Departments, Gender Identity Research and Education Society (GIREs), Press for Change, and other corporate partners representing the transgender community and A:Gender, a pan-Civil Service transgender organisation, and continues to work with representative groups to ensure up to date and comprehensive guidance is available to UK Border Agency employees required to enrol biometrics and assess applications. The BRP offers the potential of being of great assistance to the transgender community in helping them establish their identity.</p>
<p>9. Disability – That the UK Border Agency undertake a Disability Impact Assessment and that the agency should ensure that it is properly</p>	<p>The UK Border Agency has previously undertaken a Disability Impact Assessment during the rollout of Home Office Biometric Enrolment Centres. We also worked closely with The Home Office Disability Support Network (HODS) who previously advised of the potential adverse impact on disabled people</p>

<p>advised to process applications from those with may not be able to provide fingerprint data because of disability (eg. missing or damaged). (ILPA, with concerns around disability also raised by the Archbishops council of the Church of England)</p>	<p>when BRPs were introduced unless:-</p> <ul style="list-style-type: none"> <li>• suitable arrangements were made for the disabled to enrol their biometrics at the various locations;</li> <li>• we considered what to do about those unable to attend due to their particular disability;</li> <li>• we considered that fingerprints would be difficult to obtain from those with upper limb deformities;</li> <li>• we considered what to do about persons who come under the Mental Health Act.</li> </ul> <p>We have worked with HODS to check the suitability of new biometric enrolment centres as they have come on line, implemented the non-chargeable mobile biometric enrolment service, and developed 'Exemptions and Exceptions' policy in response to these recommendations.</p>
<p>10. Disability – Current access to biometric centres, such as wheelchair access, parking for disabled badge holders should be extended, as should the use of the mobile biometric enrolment service. We note the assessment of the service is on a case by case basis. It is important that there is no invasive questioning and that people are not put to difficult and complicated proofs of their need for the service. We should appreciate more information on this. (ILPA, with the British Council also commenting that the criteria for the non-chargeable mobile service should be set out and an appeal structure for those refused the option)</p>	<p>All of the Home Office's biometric enrolment centres are compliant with the Disability Discrimination Act, as are all of the booths at the Post Office's participating in the pilot for biometric enrolment.</p> <p>As the mobile biometric enrolment service is available free of charge, it is necessary for an assessment of the need of the individual or individuals requesting it. However, the UK Border Agency is aware of the need for sensitivity around establishing such a case. Given the nature of the immigration application categories rolled out to date the numbers of applicants requesting this service has been sufficiently low as to allow for a personalised case-by-case consideration process, and we are not aware of any complaints about this approach to date. As the rollout progresses to other categories will review the service and its operation.</p>
<p>11. Religious faiths and beliefs – Photo requirements should not be changed; the possibility of wearing a head-covering for religious (or medical) reasons should remain. Facilities are available in the visa application centres for biometric information to be collected discreetly by trained staff of the same gender. (ILPA)</p>	<p>There are no plans to change the current guidance regarding the taking of biometrics including photographic requirements. Therefore, the option of wearing a head-covering for religious or medical reasons will remain. The biometric enrolment process is quick and clean, there is no wet ink involved and the enrolling officer is not required to touch the applicant to facilitate the enrolment. Photographs are taken which reveal the face but we are extremely aware of the need to protect the dignity, privacy and modesty of applicants, and the facilities available at the Home Office's biometric enrolment centres and the trained staff employed take account of religious sensitivities.</p>

<p>Appointment should not be made on any religious day (British Council)</p>	<p>Appointments for the same day premium service or mobile biometric enrolment are made by the applicant at their convenience, along with appointments for postal applicants (although these must be made within 15 days of being advised of the need to provide biometrics). Enrolment at Post Offices participating in the pilot does not require an appointment to be booked and is a walk-in service available during the usual opening hours of these branches. As such, the biometric enrolment is dictated by the customer.</p>
<p>12. Age – Difficulties for elderly dependants and dependant children in providing biometrics and difficulties associated with arranging care or taking time off work to accompany dependants to an appointment. (ILPA)</p>	<p>The UK Border Agency constantly reviews its strategy for the provision of biometric enrolment services and any necessary expansion. We acknowledge that dependant children are currently unable to use the biometric enrolment service at the Post Office branches participating in the pilot but we are currently in discussions with the Post Office to agree a date for this service to be extended to dependants. We are also negotiating with the Post Office to add a further eight Post Office branches to the pilot which will assist with the spread of options for biometric enrolment in the short term and will provide biometric enrolment within the normal opening hours of those branches. Longer term we will introduce further offices throughout the UK that are aligned with the demographic of our customer base to allow easy access to foreign nationals and their dependants, and which meet required demand.</p>
<p>13. Age – if the purpose of providing biometric data is to help the UK Border Agency identify applicants and their immigration status, we would suggest that biometric data should be enrolled more frequently for children. (The Law Society)</p>	<p>Fingerprints are taken for all children aged six years and over, with a facial image being taken for those under six years old. In the case of children, we are issuing BRPs for no longer than five years. This enables us to update the facial image to ensure that we capture any natural alterations with age. We will also take this opportunity to update the fingerprints. This approach reflects the lifespan of a child's passport.</p>
<p>14. Community Relations – the BRP marks the holder out as a non-European Economic Area national, particularly since the scrapping of the (voluntary) National Identity Card Service for British nationals. (ILPA) This may be viewed as divisive, ie) only immigrants have to carry this. (British Council)</p>	<p>The UK needs to provide legitimate migrants with evidence of their permission to be in the UK. The BRP will replace the vignette (or sticker) which is currently placed in the passports of those granted an extension of their stay in the UK under Tiers 1 and 5. The format of the BRP has been set by the European law and all EU member states are required to issue biometric residence permits in this uniform format from May 2012. The BRP is not an identity card, it is a way of providing proof that a migrant has the right to live, work and access any other benefits of being in the UK.  BRPs contain features that are more secure and convenient to check than those in a vignette, so they make it easier for employers and public bodies to check the status of migrants and for migrants. As more than 275,000 such residence permits have now been issued since November 2008, employers and others required to check the status of migrants are familiar with them. Positive impacts confirmed by external</p>

	<p>engagement are that the increasing numbers of BRPs make it easier for employers to check right to work and for migrants to prove it. This in turn makes it easier for migrants holding them to access their entitlements in the UK.</p> <p>The regulations will promote good community relations and equality of opportunity by extending the rollout of a document demonstrating entitlement to work to further PBS Tiers of migrant workers, assisting migrants in obtaining employment and services to which they are entitled, rather than excluding them.</p> <p>It is not a requirement to carry a BRP at all times although it is necessary to produce it at certain specified times, such as when taking up employment in the UK. The UK Borders Act does not introduce any new powers for the police to stop and search individuals; the use of stop and search powers solely based on nationality would be a breach of the statutory powers available to the police and the officer may be subject to disciplinary proceedings.</p> <p>The UK Border Agency has worked with the Association of Chief Police Officers to produce guidance for Police Officers in England, Wales and Northern Ireland and Scotland about how the police should treat the BRP and to remind them that they cannot stop someone to see the person's BRP.</p>
<p>15. Community relations – long term impact is unknown but may be seen as an unnecessary level of bureaucracy. (British Council)</p>	<p>As the UK needs to provide legitimate migrants with evidence of their permission to be in the UK and the UK Border Agency is committed to securing our borders and controlling migration, we consider that the process we require the customer to undertake, including the use of biometric technology, is proportionate to these aims. The BRP replaces existing documentation and actually reduces the administrative burden on employers and others required to check right to work or other entitlements in the UK, as feedback from corporate partners has confirmed.</p>

## Recommendations

The EIA has provided valuable input to the UK Border Agency's work on implementing Biometric Residence Permits. Following the EIA and analysis of the concerns raised by the corporate partners the following recommendations are made:

- The UK Border Agency should continue with its work to introduce the Biometric Residence Permit, which provides convenient and secure evidence of right to work and other entitlements to the many here legally who contribute to the prosperity of the UK.
- Engagement with groups representing disability and age on the subject of access to enrolment facilities will continue as the plans for expansion are

developed. The UK Border Agency will monitor the uptake and operation of the non-chargeable mobile biometric enrolment service to ensure it continues to fulfil the needs of our customer base.

- The UK Border Agency will continue its involvement with A:Gender, to ensure that up to date operational guidance is available to staff to remove the potential for having adverse affects on the transgender community, but will continue to maintain its wider objectives.
  
- The UK Border Agency should ensure continued public access to information about the introduction of the BRP, and should continue to monitor and review arrangements. Guidance and information about the BRP should be updated on a regular basis, and communications should continue to clarify that the BRP is not an identity card in the light of the scrapping of the National Identity Service.
  
- The UK Border Agency should continue to ensure that foreign nationals issued with the BRP are fully aware of the rights and obligations it carries. Sources of information, such as internet pages, should be kept updated and references to the identity card for foreign nationals should be removed.
  
- The UK Border Agency should continue to actively engage with the established corporate partner groups and identify additional groups where appropriate.
  
- The UK Border Agency should undertake or commission a customer survey to establish empirical evidence from foreign nationals around the impact of having a BRP and whether they have been either beneficial or adverse documents to hold to demonstrate the right to live, work and receive other benefits to which they are entitled in the UK. This will aim to identify any trends which suggest negative or positive impacts on both the immigrant and wider community.

## EQUALITY IMPACT ASSESSMENT ACTION PLAN FOR THE ROLLOUT OF BIOMETRIC RESIDENCE PERMITS (BRP) TO EXTENSIONS OF LEAVE UNDER TIERS 1 AND 5 OF POINTS BASED SYSTEM (PBS)

ACTION / ACTIVITY	OWNER AND INTERESTED CORPORATE PARTNER S	DEPENDENCIES / RISKS / CONSTRAINTS	COMPLETION DATE	PROGRESS UPDATE
<p><i>This should be a list of recommendations identified in the EIA report.</i></p> <p><i>A short description of the issue being taken forward.</i></p>	<ul style="list-style-type: none"> <li>○ Unit/Department/organisation</li> <li>○ Internal &amp; External Corporate partner s</li> <li>○ How will you ensure your corporate partner s continue to be involved/ engaged in shaping the development/ delivery of this policy?</li> </ul>	<p><i>There may be other projects/initiatives that will deliver the action so make reference to these.</i></p>	<p><i>The date by which the action is to be completed.</i></p>	<p><i>Progress to date. Any slippages. New corporate partner s etc</i></p> <p><i>Give RAG rating if appropriate.</i></p> <p><i>Details of monitoring and review methods.</i></p>
<p><b>Data Collection of diversity issues - Refocus Customer Satisfaction questionnaire in relation to application and enrolment to include diversity issues.</b></p>	<p><b>Project and Communications Team</b></p>	<p><b>Closed</b></p>	<p><b>Closed - End of January 2010</b></p>	<p><b>A revised questionnaire, which included diversity questions was made available to all Home Office biometric enrolment centres. Final results have been collated and analysed for inclusion in this EIA.</b></p>
<p><b>Data collection of diversity issues - Refocus Customer Satisfaction questionnaire to</b></p>	<p><b>Biometric Residence Permits Central Operations Team (Communications) and Policy.</b></p>	<p><b>Agreement of Home Office Biometric Enrolment Centres to running another questionnaire process.</b></p>	<p><b>TBC - A revised questionnaire, which included diversity questions was made available to all Home</b></p>	<p><b>Work not begun.</b></p>

include diversity issues raised in this EIA regarding having a BRP, on the basis of the likelihood that there will by now be customers already holding a BRP applying for another who can provide feedback.		Resources to collate and analyse results.	Office biometric enrolment centres until the end of January 2010. As such negotiations will need to be conducted with Home Office Biometric Enrolment Centres.	
Publication arrangements of EIA	Policy	None currently	w/c 11 October – to coincide with laying of regulations in parliament	EIA has been drafted
Monitoring and reviewing arrangements	Policy and Biometric Residence Permits Central Operations Team (Communications)	Dependant on support from Economic and Family Migration Corporate partners team	Ongoing	New corporate partners were identified and the group invited to participate in the EIA widened. Engagement continues through established channels.
Review policy on transgender	Residence Permits Central Operations and Team	Liaison with Modernising Guidance team.	September 2010	Work to align where possible with other Government departments has been conducted and is being reviewed for publication along with the main BRP guidance.

<b>Engagement with groups representing disability and age on subject of access to enrolment facilities as expansion plans are developed</b>	<b>Biometric Residence Permits Central Operations Team and Policy</b>	<b>None currently</b>	<b>Ongoing</b>	<b>Building on established relationships and advice already received and implemented from the Home Office's Disability Support Network</b>
<b>Monitor uptake and operation of non-chargeable mobile biometric service</b>	<b>Biometric Residence Permits Central Operations Team (Communications)</b>	<b>None currently</b>	<b>Ongoing</b>	<b>Monitoring of Non-chargeable biometric service in place on a regional basis.</b>
<b>Communications in relation to this rollout to reinforce the message that the BRP is not an identity card</b>	<b>Biometric Residence Permits Central Operations Team (Communications)</b>	<b>None currently</b>	<b>Ongoing</b>	<b>All existing comms products updated to reflect the change. Further supplemental messages to be added to core UK Border Agency updates and partner engagement events. Comms plan for implementation in place for rollout during implementation window.</b>

## **ANNEX A**

Below is a copy of the questionnaire sent to corporate partners and representative groups earlier this year:

### **QUESTIONNAIRE № 4**

Last year we asked a range of interested individuals and organisations concerned with migrant working and education to contribute to our Equality Impact Assessment (EIA) for the rollout of Biometric Residence Permits (BRPs). Under the former government, these documents were known as identity cards for foreign nationals. The current government has discontinued plans for identity cards for British nationals and the National Identity Register, but BRPs are governed by European legislation and the UK Border Agency is still required by European law to provide BRPs to nationals of countries from outside the European Economic Area.

We now wish to ask organisations that may be directly or indirectly affected by a proposal to rollout BRPs to those granted an extension of stay in the UK under Tiers 1 and 5 of the Points Based System (PBS) and their dependants. Tier 1 covers highly skilled workers, investors, entrepreneurs and post-study work. Tier 5 is for certain types of sponsored temporary worker whose entry helps to satisfy cultural, charitable, religious or international objectives. Organisations likely to be affected by this proposal may have been approached previously and if so we continue to welcome your views on this occasion.

The most recent phase of the rollout was to skilled workers with a sponsor extending their stay under PBS Tier 2 on 6 January 2010. The current proposal would mean that all applicants and their dependants in the active tiers of PBS would be covered by the scheme by the end of 2010.

The UK Border Agency believes the BRP makes it easier for employers to complete right to work checks for foreign national employees and for migrants who are entitled to work in the UK to access employment.

Applicants for a BRP must enrol their biometrics (fingerprints and digital facial image) before a decision can be made. As with all BRP applications, the fee for the document is incorporated in the immigration application fee.

The UK Border Agency has ensured more options for enrolment have been created, with 17 Crown Post Office locations now offering enrolment to our customers for a handling fee of £9.40. These are in addition to 11 Home Office locations around the UK, of which seven provide a premium service for applicants wishing to apply in person and receive a decision on their immigration application that day. In addition, a mobile enrolment service is available both on a non-chargeable basis for those who are unable to travel for medical or other reasons (assessed on a case by case basis), and as part of an exclusive Super Premium caseworking Service. Further information about application and enrolment, associated fees and the process for applying for a

BRP can be found on the UK Border Agency website at: [www.ukba.homeoffice.gov.uk](http://www.ukba.homeoffice.gov.uk).

The UK Border Agency is committed to equality in the provision of service and your assistance in completing the questionnaire below will help us to monitor fair and effective service delivery and develop our policies and practices. Please return the completed questionnaire by the 25 August 2010 to the Biometric Strategy Team, UK Border Agency, 2<sup>nd</sup> Floor Green Park House, 29 Wellesley Road, Croydon CR0 2AJ, or by e-mail to: [ukbabiometricstrategyteam@homeoffice.gsi.gov.uk](mailto:ukbabiometricstrategyteam@homeoffice.gsi.gov.uk).

#### Q.1 Organisation-specific concerns

Please detail any possible causes for concern that the requirement for a person applying for further permission to stay (leave to remain) in the UK under Tier 1 or 5 of the PBS to simultaneously apply for a BRP might raise for the group(s) you represent. If you are aware of a particular case, please provide anonymised details.

Give details/suggestions around how the concern might be managed, whilst still maintaining the requirement to apply for a BRP.

#### Q.2 General

Is there any part of the process for applying for a BRP which might raise a potential for adverse impact on a specific group of employees or employers – please give details including any examples.

How can this be overcome whilst still maintaining the requirement to apply for a BRP?

#### Q.3 Race

Do you think the requirement for those applying for permission for further leave under Tiers 1 or 5 of PBS to apply for a BRP will have any potentially beneficial or adverse impact on any particular ethnic groups amongst foreign nationals subject to immigration control? Is there any evidence you could point to that supports your statement?

Why might this particular ethnic group/s be more vulnerable than other foreign

nationals who are also subject to immigration control?

#### Q.4 Gender / Gender Identity (transgender)

Do you think the requirement for those applying for permission for further leave under Tiers 1 and 5 of PBS to apply for a BRP will have any potentially beneficial or adverse impact on those who are subject to immigration control and of a particular gender / gender identity? What is the impact of the policy to only allow one permit, but allow the holder to request changes to details when they choose?

Why do you think the requirement will impact more on one gender / gender identity than another? Please give examples.

#### Q.5 Disability

The UK Border Agency already receives applications from those with varying disabilities and levels of severity. In some cases processing the application may already include recording biometric features. It is intended that accommodation for the Home Office Biometric Enrolment Centres will continue to reflect the needs of those who, for example, require access for wheelchairs. The UK Border Agency has mobile biometric enrolment capability to help those physically unable to travel to an enrolment centre.

Do you think the process around applying for a BRP will have any potentially beneficial or adverse impact on those who are subject to immigration control and have a disability or disabilities?

Are there issues other than restricted mobility which ought to be considered?

What reasonable accommodation (social/physical access) might be made to lessen the impact?

#### Q.6 Religious faith and beliefs

Do you think the requirement for those applying for permission for further leave under Tiers 1 and 5 of PBS to apply for a BRP will have any potentially beneficial or adverse affect on those who are subject to immigration control and have particular religious faiths or other beliefs?

Please give details of what the negative and positive affects might be and how they might be mitigated or supported.

#### Q.7 Sexual Orientation (bisexual, gay, heterosexual or lesbian)

Do you think the requirement for those applying for permission for further leave under Tiers 1 or 5 of PBS to apply for a BRP will have any potentially beneficial or adverse affect on those who are subject to immigration control and of a particular sexual orientation?

Please give details of what the negative and positive affects might be and how they might be mitigated or supported.

#### Q.8 Age

The biometric registration provisions do not require fingerprints from children under the age of six. Children under six are required like all applicants under the biometric registration regulations, to have a digital facial image recorded. Children and young people under 16 years of age must be accompanied by a parent, guardian or a person who takes responsibility for the child. Do you think the process for applying for a BRP will have a potentially adverse or beneficial impact on children?

Do you consider the process for applying for a BRP for older people will have an adverse or beneficial affect? Please explain your answer.

How, within the requirements, can a negative impact be lessened? How could we enhance any beneficial effects?

Q.9 In what way do you think the introduction of BRP and biometric enrolment for PBS Tiers 1 and 5 will have a positive or adverse impact on community relations?

In the short term (0-3 years)

In the long term (over 3 years and onwards)

Q10 Do you have any concerns that have not been raised in the questions above?

Thank you for taking the time to complete this questionnaire, your comments will be carefully considered and with your permission and where necessary we may contact you for further information. Please indicate whether or not you are willing to be contacted and if so provide your contact details below:

Willing to be contacted to discuss the EIA further	Name	Position & Organisation	Telephone No	Email address
Yes/No				

## **ANNEX B**

Below is a list of organisations sent the questionnaire in Annex A:

Academy of Medical Royal Colleges

Al-Khoei Foundation

Archbishops Council

Arts campaign/ NCA

Association of Town Centre Management

BAPS Swaminarayan Sanstha

Bishops' Conference of Scotland

Board of Deputies of British Jews

British Beer and Pub Association

British Chambers of Commerce

British Council

British Retail Consortium

British Shops and Stores Association

Buddhist Society

BUNAC

Catholic Bishop's Conference of England & Wales

Churches Agency for Inter Faith Relations in Scotland

Churches Together in Britain and Ireland

Churches Together in England

Circus

Confederation of British Industry

England and Wales Cricket Board

Federation of Small Businesses

Free Churches

Friends of the Western Buddhist Order

Hindu Faiths Body Steering Group

Hindu Forum of Britain

Immigration Law Practitioners' Association

Institute of Directors

International Bar Association

Interfaith Network for the UK

Inter Faith Panel of the Unitarian and Free Christian Churches Faith and Public Issues Commission

Jain Samaj Europe

Muslim Council of Britain

National Council of Gurdwaras

National Council of Hindu Temples

National Spiritual Assembly of the Baha'is of the UK

Network of Buddhist Organisations

Network of Sikh Organisations

Quaker Committee for Christian and Inter Faith Relations

Recruitment and Employment Confederation

Rugby Football League

Rugby Football Union

Scottish Football Association

Scottish Rugby Union

Sri Lankan Sangha Sabha GB

Sikh Foundation

The Football Association

The Football Association

The Football Association of Wales

The Law Society of England and Wales

Theravada Buddhist Sangha in the UK

UK Sport

Vishwa Hindu Parishad (UK)

Volunteering England

Zoroastrian Trust Funds of Europe

## ANNEX C

### **Equality Impact Assessment - Engagement with Corporate Partners and beyond: Up to September 2010**

#### ***Overview***

The launch of Biometric Residence Permits (BRPs) was a key delivery milestone for the UK Border Agency (UKBA), and the Home Office. It marked the next step in delivering a managed migration system which will 'ensure fairness' and allow Government to make sure foreign nationals 'play by the rules' when used as a tool by business and migrants alongside the rollout of the Points Based System. It provides a secure and convenient way for migrants to prove that they have the right to live, work and access other benefits of being in the UK and makes it easier for employers and others to check right to work and other entitlements.

Throughout the rollout of the wider scheme and each new stage of the incremental introduction of BRPs, it is vital that we engage with key national and regional corporate partners and communicate the message to those in specific sectors who need to recognise the document, those who will be using it and to the general public more broadly to reinforce their acceptance of the concept of BRPs in the longer term.

#### ***Objectives***

The primary objectives for engaging in preparation for the initial rollout of Biometric Residence Permits from November 2008 and which will continue to be for the additional categories as the roll out continues over the next few years are to:

- continue raising awareness about the new BRP;
- increase recognition: this is what the document looks like;
- increase understanding: what the document is for, how it will work, how to check it is valid;
- build advocacy among key corporate partners and what it will mean for the services they provide;
- to provide the follow-up: where to go for more information or help.

Under the former Government, there was also a requirement to place the document within the context of National Identity Service. Following the formation of the coalition government in 2010 identity cards for British nationals have been scrapped along with the National Identity Service. However, the format of the BRP and the requirement to introduce them has been set by European law. All EU member states are required to issue biometric residence permits in this uniform format from May 2012. The BRP is not an identity card, it is a way of providing proof that a migrant has the right to live, work and access any other benefits of being in the UK.

## **Approach**

Our communications approach to ensure these objectives are achieved by reaching our audiences with consistent messages and signposting them to further information has been through a number of different channels including:

- national and regional press and broadcast media
- on-line media
- direct mail
- digital media
- targeted advertising through trade publications (sector focused)
- media relations
- stakeholders' internal publications
- stakeholder events and one to one meetings

## **Audiences**

The key audiences for the wider rollout are:

- business - as employers and providers of services
- education sector
- foreign nationals
- media
- the public
- foreign governments and embassies
- airline and airport industries

As the rollout has progressed to include further categories new corporate partners have been identified and added, including the addition of faith groups.

## ***Business Partner Engagement and Communications – Rollouts from 25 November 2008 to date.***

There has been extensive engagement with corporate partners over the past two years, which is ongoing, and work with other Government departments (OGDs) through working groups. As a result, we have worked with our colleagues in the Ministry of Justice (MOJ), Department of Health, Department for Work and Pensions (DWP), the Department for Business, Innovation and Skills (BIS), Department for Culture Media and Sport, Department for Children, Schools and Families and other agencies and continue to do so to ensure that key messages are communicated to all their corporate partners.

The key messages have also been disseminated through our existing strategic stakeholder groups. These include the UKBA Corporate Stakeholder Group (e.g. Confederation of British Industry, Universities UK), the UK Border Force Industry Stakeholder Group (e.g. the Airline Operators Association, DEFRA, Freight Transport Association) and the Home Office Business Advisory Panel (e.g. Recruitment and Employment Confederation,

British Chambers of Commerce, British Retail Consortium), as well as taskforces set up with stakeholders impacted by the introduction of the Points Based System (Employers', Arts and Entertainment, Education). With the rollout to Tiers 2 and 1 and 5 being accelerated as we announced last year, we have also expanded our communications distribution to cover all sponsors on the Points Based System register. We also utilise existing communication channels regular briefings sent out by our central business partner team to reinforce these key messages.

A core message was communicated to all key partners at the end of August 2008, providing an overview of the document and details about the rollout in November. This was followed with written guidance describing the features of the document, which was circulated following the public launch of the BRP's design on 25 September 2008 by the then Home Secretary, which was covered through the media. The guidance provides specific information about how to check the security features and validity of the BRP to ensure all corporate partners were familiar with its design and recognised the document when presented to them.

An information pack was circulated to partners on 18 November 2008, which provided useful information including:

- Sample insert of text about BRP for websites and internal publications
- A clear visual showing a move from vignettes to the new document
- Information for employers and sponsors
- Guide to carrying out basic visual and physical checks to ensure a BRP presented is genuine
- Information on the telephone verification service
- Remarks that can be expected to be seen on the document.

This pack was refreshed and re-sent as new categories were introduced on 31 March 2009. Following a press release and communication to corporate partners on 24 September 2009 concerning the accelerated roll out, the updated pack was made available on the UKBA website. The UKBA website has been updated continuously to reflect new categories and changes in the scheme. Additionally, information has been made available on the Business Link website. Content on the UKBA website has been updated to reflect the re-naming of Identity Cards for Foreign Nationals to Biometric Residence Permits, and regular briefings sent to corporate partners have reinforced this message along with press releases.

To build advocacy and recognition of the BRP we undertook dialogue with external corporate partners. We invited partners to BRP workshops and engaged with them through sector events (education, employers, arts and culture), one-to-one meetings (such as Deutsche Bank, NUS, LGA, DWP, MoJ), and specific regional events involving large cross-sections of partners.

Road-shows were delivered across the country for corporate partners (both internal and external) during and throughout the latter half of 2008 and 2009. Key BRP messages have been added to UKBA updates at engagement events in 2010.

Annex D contains the events list showing some of the events that have taken place to engage with partners and provide information about the rollout as well as the planned forward looking engagement.

Further communications and events will be undertaken during the period leading up to the rollout of BRPs to those extending their stay in the UK under Tiers 1 and 5 of the Points Based System.

With 275,000 BRPs now in circulation, the core audiences are now increasingly familiar with them and their use and the level of engagement has been adjusted accordingly with updates on the developments in the roll out through established channels being the primary objective and activity.

## **Marketing**

Media channels were used to reach the document-checker audience which included national press, trade press and online advertising. In addition to a direct mail which was sent to 250,000 organisations, we utilised channels through a trade press campaign which ran from late October 2008, which was featured in the following sectors:

- HR Press
- Recruitment Press
- Healthcare Press
- Retail Managers Press
- Management Titles
- Catering and Hospitality Press
- Real Estate Press

We have worked with the Identity and Passport Service to feed into marketing campaigns led by them as in late 2009. This included further direct mail to 9000 targeted businesses in Greater Manchester and national trade press.

## ANNEX D

### Equality Impact Assessment - Engagement with Corporate Partners and beyond: List of events

#### Stakeholder Events

<b>2008 Events</b>	<b>When</b>	<b>Audience</b>
Welsh Assembly Government	9th May	Welsh Assembly Government
National Police Registration Working Group	22nd May	Police Regions
United States (US) Military Forces	30th May	US Military Forces
Stakeholder Event	10th June	Employers, Education, Arts
Metropolitan Police Development Day	1st & 2nd July	Metropolitan Police Registrar Staff
UKBA Corporate Stakeholder Group	3rd July	IAS / BAR / CBI / English UK / ILPA / TUC / Universities UK
Department for Works and Pensions (DWP) National Identity Service (NIS) Working Group	7th July	DWP, JobCentre Plus
Member of Parliament (MP) Caseworkers	9th July	MP Caseworkers
MP Caseworkers	10th July	MP Caseworkers
Joint Education Taskforce	17th July	Universities, Private Colleges, student advisors
National Identity Service	18th July	Deutsche Bank
Business Advisory Panel (Identity and Migration)	30th July	Business Representatives

Employer Taskforce (Central London)	31st July	Employers
Communities & Local Government	8th August	Communities & Local Government
Meeting with National Union of Students (NUS)	15th August	NUS
DWP - Stakeholder Meeting	26th August	DWP, JobCentre Plus
Distribute Core Script to Stakeholders	29th August	Stakeholders
National Points Based System (PBS) Roadshow - Brighton (PBS event led by Managed Migration Stakeholder Mgmt Team)	3rd September	Regional stakeholders
Crown Dependencies Biometrics and Identity Cards meeting	4th September	Isle of Mann, Guernsey
National PBS Roadshow - Regent's Park (PBS event led by Managed Migration Stakeholder Mgmt Team)	5th September	Regional stakeholders
National PBS Roadshow - Glasgow (PBS event led by Managed Migration Stakeholder Mgmt Team)	8th September	Regional stakeholders
National PBS Roadshow - Cardiff (PBS event led by Managed Migration Stakeholder Mgmt Team)	11th September	Regional stakeholders
National PBS Roadshow - Bristol (PBS event led by Managed Migration Stakeholder Mgmt Team)	12th September	Regional stakeholders
Trade Unions Update Meeting	15th September	Trade Unions
Officials Working Group	15th September	Officials Working Group
Employment Consultation Forum	17th September	Employers and their intermediaries (reps for fed of small businesses)
National PBS Roadshow - Belfast (PBS event led by Managed Migration Stakeholder Mgmt Team)	19th September	Regional stakeholders
Ministerial Working Group	19th September	Stakeholders
National PBS Roadshow - Derby (PBS event led by Managed Migration Stakeholder Mgmt Team)	24th September	Regional Directors (UKBA) / stakeholders
Launch of identity card for foreign nationals Home Secretary	25th September	Press
Level 1 Guidance distributed	25th September	Stakeholders

Joint Education Taskforce (at LSC, London)	30th September	Education Sector
British American Business Immigration Conference	1st October	American companies in UK & UK companies in America
Employing and Vetting Non-UK Nationals	7th October	National Health Service; Healthcare & Pharmaceutical; Local Councils; Charities; Banking; Sporting; Arts; education; Cabinet Office; Treasury Solicitors
UKBA Ministerial Event	7th October	c.60 MPs
DWP National Identity Scheme Working Group	7th October	DWP, JobCentre Plus
Meg Hillier meeting with Junior Ministers	8th October	Junior Ministers
Employer Taskforce	8th October	Employment Sector
Arts & Entertainment Taskforce	8th October	Arts & Ents Sector
NIS Officials Working Group Comms Sub Group	14th October	OGD's Communications Teams
Supervisors Forum	14th October	Money Laundering
Ministerial Working Group	15th October	Ministers
Rwanda Chief of Immigration Visit	16th October	Rwanda Chief of Immigration
Kenyan and Ugandan governments	20th October	Kenyan and Ugandan governments
ID Cards for Foreign Nationals Workshop	29th October	External Stakeholders by invitation
Minister & CEO Sit Rep	Monthly	UKBA Board and Senior Management
Care Home Live	5-6th November	Care Sector
NARIC	6th November	Education side - examining board, accrediting bodies

International Marketing Conference for UK boarding school staff (Windsor)	7th November	School Heads (80+)
Business Advisory Panel	7th November	Business Representatives
DWP National Identity Scheme Working Group	10th November	DWP, JobCentre Plus
British Council	10th November	British Council
Arts & Entertainment Taskforce	12th November	Arts and Entertainment Sector
Identity Fraud Forum	12th November	Identity fraud
ACPO Meeting	17th November	Essex Police, North Yorks Police, British Transport Police
PBS Tier 4 National Event - London & The South	17th November	Education Sector
Employer Taskforce	18th November	Employer Sector
PBS Tier 4 National Event - Scotland and Northern Ireland	19th November	Education Sector
MPs Caseworker Event	19th November	HO MPs caseworking teams
LACORS Conference	19th November	Local Authorities Coordinators of Regulatory Services
ICFN Workshop	20th November	Stakeholders responding to invite (mixed)
PBS Tier 4 National Event - Midlands and The North	21st November	Education Sector
Croydon Go-live	25th November	Public
PBS Tier 4 National Event - London & The South	27th November	Education Sector
Sheffield Go-live	28th November	Public
Industry Stakeholder Group	2nd December	Airline Sector
Liverpool Go-live	4th December	Public
Solihull Go-live	8th	Public

	December	
Schengen meetings	8th December	French Presidency of EU / Consuls Generals / Head of the visas sections of all the Schengen countries / a representative of the European Commission.
Welsh Local Authorities	9th December	Welsh Local Authorities
Joint Education Taskforce	9th December	Education Sector (30 attendees)
Cardiff Go-live	10th December	Public
Diplomatic Induction Seminar - consular workshop (FCO)	11th December am	London-based diplomats, FCO staff
Recruitment Managers Event - London Councils	11th December am	Public Sector Recruitment
Glasgow Go-live	12th December	Public
Armagh Go-Live	12th December	Public
Thai Embassy	15 <sup>th</sup> December	Thai Embassy
PS/Ministry of Labour and Home Affairs, Botswana (Visit)	17th December	PS/Ministry of Labour and Home Affairs

<b>2009 Events</b>	<b>When</b>	<b>Audience</b>
Joint Education Taskforce	10th February	Education Sector
Arts and Entertainment Taskforce	11th February	Arts & Ents Sector
Employers Taskforce	11th February	Employment Sector
Association of British Insurers	13th February	1:1
Interview Office Network (IPS) Annual Conference	13th February	IPS
1:1 Meeting with Foreign and Commonwealth Office Managed Migration	16th February	1:1

Universities UK	18th February	1:1
MP and Caseworks PBS Events - Newcastle	18th February	MPs and their Caseworkers
Meeting with British Banking Association and Meg Hillier	23rd February	1:1
Department for Innovation, Communication and Skills	25th February	1:1
Industry Stakeholder Group - Aviation Sub-group	26th February	Aviation Members
Business Forums International: Employing and Vetting non UK Nationals Workshops	26th February	Business Representatives
Joint Education Taskforce	26th February	Education Sector
Business Advisory Panel	4th March	Business Representatives
Employer Talk 2009 (HMRC) - London	5th March	Employers
Diplomatic Induction Seminar - consular workshop (FCO)	10th March	Diplomats (Head of Missions)
UKCISA Meeting	11th March	Higher Education
British Medical Association	12th March	1:1
MP Caseworkers, Taunton	12th March	MP's and their Caseworkers
MP Caseworkers, Bedford	12th March	MP's and their Caseworkers

PBS Workshop (Bespoke) Independent Schools - Birmingham	16th March	Independent Schools
Employer Talk 2009 (HMRC) - Leeds	17th March	Employers
National Migration Group	18th March	NMG Members
Employer Talk 2009 (HMRC) - Chorley	18th March	Employers
Employer Talk 2009 (HMRC) - Chorley	19th March	Employers
Chevening Fellows - Sussex Centre for Migration Research	19th March	Chevening Fellows FCO
PBS Workshop (Bespoke) NUS Representatives - Birmingham	19th March	NUS Representatives
UKBA London and South East Senior Management Team	23rd March	SMT
PBS Workshop (Bespoke) Independent Schools - Edinburgh	23rd March	Independent Schools
Employer Talk 2009 (HMRC) - Birmingham	31st March	Employers
IPS Retail Stakeholder Event (FOS)	3rd April	Retailers
ICFN Programme Board	7th April	Programme Leads
UKBA Wales & South West Senior Management Team Meeting	7th April	SMT
Asylum and Immigration Tribunal Jurisdictional Meeting	7th April	AIT
Identity Senior Management Team	20th April	SMT

UKBA Mids and East Senior Management Team Meeting	20th April	SMT
UKBA Scot & Northern Ireland Senior Management Team Meeting	21st April	SMT
Meeting with Universities UK	21st April	1:1
Meeting with UK Trade and Investment Policy Section	27th April 2009	Migration Meeting Members for UKTI
UKBA North West Senior Management Team Meeting - Manchester	30th April	Regional Board
Ministerial Working Group	6th May	Ministers
Employer Talk 2009 (HMRC) - Cardiff	6th May	Employers
JET Taskforce 14.00 - 16:00 - London	19th May	Education Sector
Employer Talk 2009 (HMRC) - Edinburgh	20th May	Employers
Visit to Isle Man	28th May	Officials
Employer Talk 2009 (HMRC) - Coleraine, am, University of Ulster	2nd June	Employers
Employer Talk 2009 (HMRC) - Belfast	3rd June	Employers
Business Advisory Panel	4th June	Business Sector
ICFN Programme Board	9th June	Programme Leads
London & South East Region Staff Events	10th - 11th June	L&SE Staff

Croydon PEO Visit - DVLA workstream of POL	11th June	DVLA
Employer Talk 2009 (HMRC) - Manchester, Manchester United FC, Old Trafford	17th June	Employers
NHS Counter Fraud and Security Management Service	17th June	NHS Fraud Community
NW Change Marketplace - Manchester Airport	18th June	Staff
HMRC External Stakeholder Event	18th June	Cross Section of external stakeholders
Northern Ireland Dept for Employment and Learning Migrant Workers' Forum - Belfast	19th June	External Stakeholders and OGDs concerned with impact of migratory policies in Northern Ireland
Employers Taskforce	23rd June	Employment Sector
Joint Education Taskforce	23rd June	Education Sector
UK Advisory Network Summer Reception	25th June	External UKTI network event
UKCISA Annual Conference Warwick	1-3 July	UKCISA Membership
ICFN Programme Board	7th July	Programme Leads
PBS T4 Events - ICFN	7th July	Licensed Sponsors
Employer Talk 2009 (HMRC) - Tonbridge, The River Centre	8th July	Employers

PBS T4 Events - London	9th July	Licensed Sponsors
PBS T4 Events - London	10th July	Licensed Sponsors
PBS T4 Events - Manchester	14th July	Licensed Sponsors
PBS T4 Events - Queens Hotel Leeds	15th July	Licensed Sponsors
PBS T4 Events - Novotel Birmingham	16th July	Licensed Sponsors
PBS T4 Events - Marriott Cardiff	21 July	Licensed Sponsors
Joint Education Taskforce	29 July	Education Sector
Arts and Entertainment Taskforce	29 July	Arts & Ents Sector
ICFN Programme Board London	11th August	Programme Leads
Business Advisory Panel	2nd September	Business Sector
London Organising Committee of the Olympic Games visit to Stanstead	3rd September	London Organising Committee of the Olympic Games
ICFN Programme Board London	8th September	Programme Leads
Employer Talk 2009 (HMRC) - Exeter	8th September	Employers
Employer Talk 2009 (HMRC) - Newbury	10th September	Employers
Ukraine Delegation	16th September	Officials
Home Secretary event Croydon - Press Release and Stakeholder Communication	24th September	Public, Stakeholders (including 23k sponsors)

Joint Education Taskforce	24 <sup>th</sup> September	Education sector
Employer Talk 2009 (HMRC) - Durham, Ramside Hall Hotel	24 <sup>th</sup> September	Employers
ICFN Programme Board London	6 <sup>th</sup> October	Programme Leads
Employer Talk 2009 (HMRC) - Nottingham, East Midlands Conference Centre	7 <sup>th</sup> October	Employers
Business Immigration Conference 2009	8 <sup>th</sup> October	Tier 2 Sponsors and Businesses

<b>2010 Events</b>	<b>When</b>	<b>Audience</b>
BRP Tier 2 Launch Communications package	06 Jan	All UKBA Partners
Scottish HEIs Colleges meeting	18 <sup>th</sup> January	Education sector
BFI - Vetting & Screening Non-UK Nationals Employees - London	28 <sup>th</sup> January	Employers
AOC Further Education Workshop	1 <sup>st</sup> February	Education sector
International Student Experience	4 <sup>th</sup> February	Education sector
Joint Education Taskforce meeting	10 <sup>th</sup> February	Education sector
Sport and Governing Body Meeting	February	Sports sector
Employers Taskforce meeting	March	Employers
Arts & Entertainment Taskforce	March	Employers and Tier 5 Partners

UCAS International Conference	22nd June	Education sector
BF Industry Stakeholder Group Aviation Sub-Group	2nd June	Employers
Meeting of Joint Education Taskforce	25th June	Education sector
BUILA Conference	6th July	Education sector
Law Society	8th July	Legal Sector
Meeting of Employer Taskforce	12th July	Employers
Meeting of Arts & Entertainment Taskforce	12th July	Employers and Tier 5 Partners
AOC Further Education Workshop	13th July	Education sector
AOC Further Education Workshop	16th July	Education sector

### **Planned 2010 events – forward look**

NHS Employers Meeting	22 <sup>nd</sup> September	Employers
UK NARIC	23 <sup>rd</sup> September	Education sector
Association of Colleges meeting	24 <sup>th</sup> September	Education sector
Recruitment and Employment Confederation	24 <sup>th</sup> September	Employers
Independent Schools Council	24 <sup>th</sup> September	Education sector
Joint Education Taskforce	28 <sup>th</sup> September	Education sector
The Boarding Schools' Association	28 <sup>th</sup> September	Education sector
5th annual FE and International Markets conference	14 <sup>th</sup> October	Employers

Employer Taskforce Meeting	October	Employers
Arts & Ents Taskforce Meeting	October	Employers and Tier 5 Partners
UK NARIC Annual Conference	8th and 9th November	Education sector

