



**HM Passport
Office**

Policy Team

Overseas Policy and Procedure Changes 9th June 2014

Note: This briefing note applies to Examination staff processing Overseas Applications in Belfast, Durham and Liverpool.

Overseas Policy & Procedures Changes

Background

This policy note follows the earlier letter from Ian Forster and Shane Bryans about exercising discretion in overseas applications.

Teams have been working across HMPO to identify better ways to examine overseas passport applications. Along with other process and communications improvements, the changes to Policy and Procedures are aimed at enabling overseas applications to be processed more quickly without compromising the quality and security of either the process or the passport.

The work was carried out in response to the significant levels of Work in Progress, (WIP), for overseas passport customers and focussed on five core work streams:

- Customer Escalation and FCO Engagement;
- Overseas Policy;
- Customer Communication and the .GOV.UK customer journey;
- Overseas Process Improvement;
- AMS/Digital Change and MI.

Visits to Belfast, Durham and Liverpool to engage with Overseas Examination staff, a review of available MI, meetings with senior managers and workshops with policy and communication groups generated and evaluated our recommendations. This enabled the group to map the most important issues causing delays at each stage of the application and examination process.

Initial changes to Policy and Procedures are outlined below. The changes are focussed on achieving the right balance between customer service, public protection and organisational requirements. There will be a further policy note in the coming weeks after additional analysis and discussion is finalised. These changes are being published now in light of the need to speed up turnaround times for customers. However, they will be incorporated into the Policy and Procedures Guide (PPG) in forthcoming formal updates. At that point, examiners should follow the PPG as usual.

Please note, the guidance below makes clear where these changes should be applied retrospectively to existing cases, cases that are held in File Holding or cases in pigeonhole.

Any queries should be directed to the Policy Team via your Policy Network Group representative.

Changes to Policy

Alternative Addresses

Applications received on or after the date of this Policy Bulletin:

It has been agreed that, where an applicant provides an alternative address, a separate “disclaimer” and evidence of a link to that address will no longer be mandatory if there are no other concerns or fraud indicators.

Where concerns may exist, Overseas Examiners can use their discretion to request evidence of an alternative address based on a judgement of the application as a whole:

- If the delivery address is in the same country, (or a country in the same risk category), then the Overseas Examiner may first do an internet search to confirm that the address exists and can accept the alternative address at face value if found. If they still have concerns, they can request evidence.
- If there is an alternative delivery address in a higher risk country than the category the application currently sits in, (i.e. delivery to a Heightened risk country on an application originating in a Standard risk country), or if the Overseas Examiner has any concerns or has identified any fraud issues, then the Examiner can request an explanation and/or evidence of the delivery address.

Work In Progress (WIP):

For WIP and cases in pigeonhole it has been decided that HM Passport Office will rely on the existing declaration text to act as a disclaimer (i.e. “...as far as I know all the information I have given in this application is correct...”). Thus, no separate additional disclaimer is now required with such applications.

In addition, the policy outlined above regarding documentary evidence can be applied retrospectively to cases currently in WIP or pigeonhole. This means that Overseas Examiners do not need to request additional evidence for alternative address purposes if this is outstanding. Any other missing evidence should still be sought in line with other policy.

Address Evidence

Overseas Examiners are reminded that they can accept proof of residency as well as address evidence. Overseas Examiners should be confident that the applicant owns and uses the identity in which they are applying and that the applicant is showing a 'biographical footprint' in that identity. Overseas Examiners should also be sure that the applicant lives in the same country that they are applying from in order to ensure that the correct risk category is being used.

Discretion within the Threat Assessment:

Staff are encouraged to use discretion when handling overseas applications. The letter dated 9 June from Ian Forster and Shane Bryans reminded staff that the use of discretion is part of the examination process. This letter can be accessed via the following hyperlink:

http://exchange/news/index_news_34879.asp

For all applications:

- Where a particular piece of documentary evidence is outstanding from an application, staff can consider alternative evidence from HM Passport Office systems or alternative documentation/evidence provided by the applicant if:
 - it is of equal or better quality than the missing document/evidence and
 - still meets the objective of verifying identity, nationality and entitlement.

For substantial FTA applications:

- Examiners, Examiner Quality Consultants and Fraud Investigation Officers can use discretion when submitting an application to the Overseas Counter Fraud Network, (OCFN) when some documents may still be outstanding.
- Cases can proceed to FIU and onto OCFN if there are still some outstanding documents where:
 - **all** documentation (copies or originals), necessary to make an initial provisional nationality determination have been submitted **and**
 - at least one request for other outstanding documents has been sent with a reply from the applicant explaining why the documents have not been provided.
- In such cases, the examiner should case note the reason provided by the applicant for not submitting the documents so the matter can be addressed by the OCFN in advance of the interview (through either seeking the documents once more, seeking originals where copied documents have been provided, seeking other evidence or raising the issue at interview).
- The examiner should also include any other evidence available on HMPO systems that may assist the OCFN in progressing the case.

- Examiners are reminded that the OCFN will consider the need to conduct countersignatory and document verifications and it is not necessary for this step to be conducted by examiners in the UK.

Countersignatories

We will continue to require a copy or an e-mailed scan of the countersignatory's passport where the countersignatory is a US, EU or Commonwealth citizen. Overseas Examiners are expected to request this from the countersignatory when it is not provided and they will need to contact the countersignatory for verification purposes.

However, on a discretionary basis, a photocopy or e-mailed scan of a countersignatory's current valid National Identity Card can be accepted instead of a passport copy, if the card is issued from one of the countries listed below to one of their nationals:

- Austria
- Belgium
- Czech Republic
- Estonia
- Finland
- Germany
- Hong Kong
- Hungary
- Latvia (only issued since 2012)
- Lithuania
- Luxembourg
- Malta
- Netherlands (Holland)
- Poland
- Portugal (issue dates from 2007 only)
- Slovakia
- Slovenia
- Sweden
- Switzerland

These national identity cards were selected on the basis of the quality of the identity card design, the rigour of their issuing process, the relatively low level of documented abuse of such documents at UK/Schengen borders and our ability to access samples of such identity cards for comparison purposes.

Examiners can review copies of passports and identity cards against samples held on the Knowledge Base and the PRADO website:

<http://prado.consilium.europa.eu/EN/homeIndex.html> A link to the PRADO website has been included in the general information folder of the Knowledge Base.

This information has yet to be published in our guidance but Teleperformance (TP) and Customer Enquiry Centre (CEC) lines will be updated in the coming weeks to reflect this.

It should also be noted that Overseas Examiners may telephone or e-mail a countersignatory in order to request photocopies or scans of passports or ID cards.

Additional Passports

Staff are reminded that they can consider whether an additional passport and frequent traveller policy can be used in order to assist customers overseas.

While it has been agreed that publicity given to this service will continue to be restricted, we will be ensuring that Teleperformance, (TP), and our Customer Enquiry Centre, (CEC), have lines to take and are able to identify a customer who requires an additional passport. We also plan to share this with our colleagues in the Consular Contact Centres so that the best and most up to date guidance can be passed to customers.

There are four points with regard to documentary evidence for an additional passport:

- For an application for a first additional passport where the applicant has provided their passport, the examiner can use their discretion to not seek a letter of confirmation from an employer where other information indicates that the applicant is eligible for an additional passport – for example, regular entry and exit stamps/visas in the applicant's current valid passport alongside additional information provided by the applicant.
- For an application for a first additional passport where the applicant has provided a copy of their original passport, this can be accepted on discretion of the examiner once:
 - The details provided match those recorded on the Main Index;
 - The applicant has provided other evidence which demonstrates that they are eligible for an additional passport and;
 - There are no other fraud concerns.
- For the renewal of an additional passport, Overseas Examiners will be able to use their discretion to allow the application to be processed without a formal letter showing the need for an additional passport if the Overseas Examiner is satisfied that this is the correct service to be provided based on other information and/or evidence provided by the applicant, for example regular entry and exit stamps/visas in the applicant's current valid passport alongside additional information provided by the applicant.
- Where an Ambassador or Deputy Head of Mission of a British mission provides a personal assurance to HMPO that an applicant meets the

eligibility criteria for an additional passport, this may be accepted without requiring further evidence other than the passport (or a copy of the applicant's passport in the case of a first additional passport). This assurance can be provided by email/letter and must be case noted on the application.

Use of Name Evidence for Changes of Name by Marriage

For applications where the applicant has changed their name by marriage in a standard or heightened risk country, the marriage certificate will be usually sufficient evidence and no further "use of name" evidence will be required.

This only applies where the applicant is seeking to change their name to their married name, or a combination of their married-maiden surnames, as reflected on the marriage certificate.

However:

- If the applicant provides a dual national passport in a different name, their application should be withdrawn until they change the name in their dual national passport to the one that they are requesting on their British passport. The current withdrawal policy is to apply, which gives the applicant the opportunity change the name in the dual national passport, before the application is withdrawn on the system.
- Examiners must heed information about change of name after marriage available in the Knowledge Base and use their discretion to consider whether additional evidence is required. For example, if the applicant is required to change their name after marriage through a formal change of name process in their country of residence, and there is an indication from the application that this has not occurred, examiners should seek confirmation/evidence from the applicant that this process has been successfully completed.
- Examiners should satisfy themselves, through reviewing the application as a whole, that the individual is using the same name for all purposes, in line with existing policy.

Examiners can apply this guidance from the date of this note. Updates to published guidance will be arranged in the coming weeks.

Declaration and Child Signatures

Examiners will be aware that Steria have recently started to handle signature errors for overseas applications. In response to issues with scanning signatures from online declaration forms, a workaround has been agreed with Steria whereby a full signature may not be present on the system.

It has been agreed that Steria will either put in place a workaround using a dummy online declaration form to capture signatures that fail to scan and/or

creep outside of the box or into the black signature box lines. In such cases, HMPO have agreed to accept that Steria can crop the signature to assist the scan, once that the individual's name can still be reasonably identified.

In implementing this approach, HMPO accepts that small parts of the signature provided by the applicant will not appear on the passport. It has been decided that this is an acceptable compromise following review of the benefits and risks of this approach. TP, Operational Staff, CEC, Newport CCC and DLR will receive lines to handle potential customer queries on this point.

For examiners, there are three key points to bear in mind:

- This will reduce the need for Steria to write out due to signature scanning issues. Steria will continue to contact customers where no signature has been provided on the declaration form at all.
- For cases with scanning issues received before Steria started handling scanning errors or currently in pigeonhole, Overseas Examiners are not required to request a new form, but send applications through to Steria as an Examiner Return so that the above process for capturing signatures can be used. The BPO Return form should be noted "Referred for signature cut/paste" to distinguish it from a regular Signature/Photo Rescan.
- When examiners review signatures on overseas applications, they should not return cases to Steria where some of the signature may not have been captured but the applicant's signature can still be reasonably identified from what has been scanned.

This new approach will have a phased implementation across APC's. It will commence on the following dates:

Liverpool: Wednesday 11th of June

Durham: Wednesday 11th of June

Belfast: Wednesday 18th of June

Local communications will highlight any change to these dates, if required.