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Dear Monique Hawkins,

Thank you for your letter of 12 May 2022 to Kevin Foster MP, former Minister for Safe and Legal Migration, regarding what you refer to as the entanglement of separate digital status profiles and apparent incomplete initial profile set-up. Your letter has been passed to me to reply. I apologise for the delay in responding.

We appreciate your detailed engagement on this matter and have shared your queries with the appropriate technical team. Please find below our responses:

1. Entangled immigration status - where logging in with one person's identity document displays the immigration status of another person

Q1. What type or types of event can cause a status to change from being correctly visible through View & Prove to no longer being correctly visible?

A Digital Status record and profile on View and Prove is drawn from the Home Office's various data platforms. We have taken action to match individual's identities, where more than one identity may exist for the same individual, to improve their experience and improve their data quality, reducing the risk of multiple records which could create problems further down the line.

A risk associated with such matching is that, in rare cases, identity aspects such as name may be incorrectly associated with another individual, thereby entangling them.

In most cases, this occurs with family members, particularly where identity aspects such as date of birth, country of birth, family name are very similar or the same, (e.g. twins). It is extremely unlikely that non-family members would be affected.

Another instance where this could occur is during case working. If a case worker updates an account incorrectly, this could result in incorrect merging of data.

In both cases, this can result in an individual seeing the immigration status of another person or someone else's name on their own immigration status. Not all entangled immigration statuses result in an individual's profile being incorrect.

We do not display an individual's identity document number on their digital status profile and there are no known circumstances where an individual could see another person's identity document.

We class any entangled issue reported to us as an 'incident' and we have a clear escalation path to minimise the impact of this breach. All such incidents are referred to the relevant Data Protection Officer to investigate and assess against the data protection legislation to determine next steps and raise with the ICO if necessary.

To ensure incidents affecting the View and Prove service are investigated and diagnosed effectively, we have a dedicated Problem Manager assigned to incidents affecting the View and Prove service. They work across all technology services which integrate to View and Prove to ensure the root cause is identified and resolved, no matter which technology service is the cause.

In particular:

Following on from Q1, in particular:

- a. Can this be caused as a result of a status holder updating their immigration status with a new address?**

No, we do not have any known issues with the change of address function causing an entangled immigration status.

- b. Can this be caused as a result of a status holder updating their immigration status with a new identity document?**

Updating a new identity document generally does not impact digital status and result in an entangled status.

As part of processing a request to update a UKVI account holder's ID Document, we have operational safeguards in place to ensure that immigration statuses are not entangled due to a mistake by the account holder (for example if they were to input a document number incorrectly).

- c. Can this be caused by any other actions initiated by a status holder?**

Where a status holder has made multiple applications for family members under the same document number (for example if they are applying for their children), this may increase the chance of their immigration status becoming entangled with that of another family member.

- d. Can this be caused by a bug in a Home Office maintenance or upgrade process?**

We are aware of the root causes for entangled immigration statuses as outlined above, however, there is always a possibility that a change to systems can introduce issues. All new upgrades and releases to services undergo rigorous

testing to minimise the risk that new issues are introduced. No testing process can be 100% accurate, and we are continuously expanding our testing scenarios to safeguard the integrity of immigration statuses.

e. Can this be caused by any other cause identified by the Home Office?

In addition to individuals reporting issues, our own internal live service management teams constantly monitor the performance of our services. They use software tools to check the services are operating within set parameters, and which generate alerts if those parameters are being breached. Any such incidents are logged and investigated by technical teams to find the technical problem and fix the root cause.

Q2. Does the change (from status correctly visible through View & Prove to status no longer correctly visible) affect the record of the immigration status itself, or is it limited to entangled access details and/or user profiles?

It is unlikely an entangled status issue would affect a person's immigration status in the case working systems if it is isolated to a data problem within the data platforms.

Q3. Is the Home Office able to run a programmatic audit to identify all affected records where access to the status via any of the websites "View and Prove your Immigration Status"¹ [V&P], "Prove your right to work to an employer"² [RtW] or "Prove your right to rent in England"³ [RtR] displays the immigration status details of someone other than the owner of the identity document used to log in?

Yes, we have invested in and recently released tooling to scan our data platforms and identify risks that an entangled immigration status has occurred. The results of these proactive data quality reviews are investigated and corrected. Please note that not all entangled immigration statuses result in an individual's status profile appearing incorrect.

The development of this tooling is ongoing as part of continually investing in data quality to safeguard citizen data.

a. If so, has the Home Office run such an audit? Has it contacted individuals?

Yes, in August 2022 we ran this tooling on all EU nationals who applied under the EU Settlement Scheme. We will only contact individuals if we determine that their immigration status profile has become affected due to entanglement, and they have contacted us to notify that they have discovered this.

In some cases, we can identify an entanglement before it is presented to an individual. In these instances, we fix them and therefore do not contact the individual as it is corrected prior to being presented to an individual.

b. If not, why is this not possible?

¹ <https://www.gov.uk/view-prove-immigration-status>

² <https://www.gov.uk/prove-right-to-work>

³ <https://www.gov.uk/prove-right-to-rent>

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As per our answer above, we have run an audit as described, and continue to improve this.

Q4. What circumstances can lead to someone, with status under the EU Settlement Scheme [EUSS] and a Biometric Residence Card [BRC], being unable to log in via V&P but instead being able to log in via RtW and RtR and choosing the option of “I have a biometric residence card or permit”? As a result, their status is shown without using the security mechanism available to EUSS and other eVisa status holders.

This issue is not caused by an entangled status.

All EUSS permission holders will have a digital record of their status. There are no known status issues where an individual can access RTR/RTW with their BRC but cannot access View and Prove.

The only reason someone could access RTR/RTW and not View and Prove is if there is a problem with their UKVI Account, rather than their immigration status. Individuals need to ensure they are using the registered ID Document that is associated with their account when logging in. If they are experiencing problems with their account, they can contact the Resolution Centre to resolve access problems with their UKVI Account.

Q5. Has a fix been identified to correct the digital status of affected individuals?

Yes, a fix for de-tangling entangled statuses has been identified. We have an escalation process and well-established technical fixes that are applied to affected individuals.

a. When was this fix identified and when was it implemented?

Fixes must be applied on a case-by-case basis, and we apply these fixes as soon as we become aware that an individual's profile has been affected. We resolve these issues by identifying the individual's data that has become entangled and manually 'de-tangling' the affected data, whilst locking the account so that the individual cannot see the entanglement anymore.

These steps were first identified in 2019 and we have iterated and improved our approach since then.

b. Does the fix have to be manually applied for every individual who reports an entangled status to the Home Office, or is a system-wide fix available which can repair all such affected digital status?

Currently, it is only possible to apply fixes on a case-by-case basis due to complexities around causes of entanglements, outlined in Q1. We can only partially automate the resolution of these issues, as due to the sensitive nature, we would always look to involve one of our operational identity teams to ensure that an individual's data issue has been resolved correctly.

However, as described in Q3, we are continually investing in tooling to automate the discovery of entangled immigration statuses, across all data platforms, so that we can resolve the entangled status before it is presented to an individual on View and Prove.

We continue to investigate any system wide permanent root cause in parallel to improving our ability to automate the discovery process of entangled immigration statuses.

Q6. Have all instances of entangled status identified been reported to the Information Commissioner's Office as personal data breaches?

We have no known data breaches relating to digital immigration status that have been reported to the Information Commissioner's Office (ICO) since the launch of the EU Settlement Scheme (28th August 2018). We take data breaches extremely seriously and if they occurred, they would be reported and raised with relevant teams in accordance with Home Office data handling procedures. All such incidents would then be referred to the relevant Data Protection Officer to investigate and assess against the data protection legislation to determine next steps and raise with the ICO if necessary.

Q7. Have you communicated personal data breaches arising from entangled status to the individuals impacted?

If an entanglement occurs but is fixed before it is presented on View and Prove, we do not communicate this to an individual, as the correct information will be showing when status is available on View and Prove and therefore, there is no breach.

If a breach has occurred and after this point and an individual sees incorrect information and contacts us, UKVI Resolution Centre will communicate with that individual and resolve the issue.

Q8. Were the above issues identified in the Data Protection Impact Assessment ('DPIA')? Are you in a position to now disclose the DPIA?⁴

We intend to release the DPIA at a future date and further information will be made available in due course.

2. Incomplete set-up of portal records

Q9. Is the Home Office able to run a programmatic audit to identify all affected records where login details stored in the system that generates security codes do not have corresponding records in the system that stores immigration status?

Anyone who has a digital status under EUSS will have a UKVI Account, therefore we do not have any known issues where an individual has immigration status stored, without a UKVI Account that will receive security codes (two factor authentication).

a. If so, has the Home Office run such an audit? Are proactive efforts made to correct these incomplete portal set-ups?

Not applicable, see above answer

b. If not, why is this not possible?

Not applicable, see above answer

I hope the above responses answer your questions satisfactorily. Please let me know if you have any other feedback or questions in this area.

Yours sincerely

Simon Tomlinson

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