

By email: Seema Malhotra MP, Parliamentary Under-Secretary of State for Migration and Citizenship and Parliamentary Under-Secretary of State for Equalities

Cc: Digital Status Services Stakeholder Forum, Independent Monitoring Authority

15 January 2025

Dear Minister,

Problems linking identity documents to eVisas through updating UKVI accounts

We are writing to summarise a number of problems related to linking identity documents to eVisas, which appear to be of a systemic nature. In the context of the expanded roll-out of the Electronic Travel Authorisation (ETA) scheme, you will appreciate that this is causing significant anxiety for individuals affected and adding to the workload of legal advisors.

As you will be aware, travelling to the UK with an identity document that is not linked to an eVisa will be challenging. We appreciate the mitigating measure you put in place in December 2024 to allow expired BRPs and BRCs to be accepted by carriers; however, this will not work for those who are not, or are no longer, in possession of such an expired document. We, along with many other organisations, have therefore highlighted to our members, followers and supporters that it is imperative to use the “Update your UK Visas and Immigration account details”¹ functionality to link their identity documents to their eVisa.

We have been made aware of a number of problems which we will set out in detail:

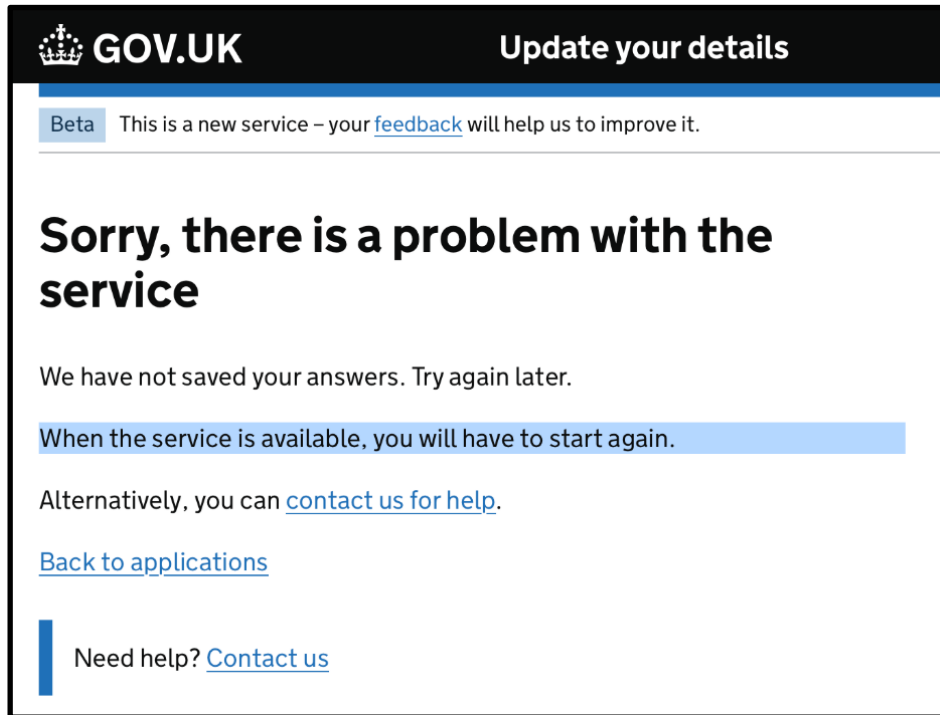
Problems with the update functionality:

1. Functionality to add identity documents raises an error
2. Functionality to add identity documents is missing
3. Inability to link Home Office issued Travel Document to eVisa
4. Dual nationals unable to link identity document without posting it to Liverpool
5. Entries missing from the list of identity documents
6. eVisa system incorrectly dealing with ICAO-standard MRZ limitations
7. Unable to login to “Update your Immigration Details” website

Below, we provide a more detailed explanation of these problems.

¹ <https://www.gov.uk/update-uk-visas-immigration-account-details>

1. Functionality to add identity documents raises an error



We received many reports of a persistent inability to add identity documents to UKVI accounts in the 10 day period leading up to the end of 2024, due to problems accessing the identity document update functionality within the 'Update my Immigration Details' webpage.² Some of these reports came from advisors who were attempting to do this for multiple clients. It appeared that there was a ten day period where this update functionality was not available:

"UKVI "Update your details" is currently not functioning. Various of our users who used a BRC to identify themselves for a status application are trying to upload their passports, and are just receiving an error message ["Sorry, there is a problem with the service"]. This has been going on since before Christmas. This has happened to three of our users, the first on 20 December and this final one which I have just checked a few minutes ago. A very bad time for Update your Details to go down."

Advisor, 30 December 2024

"For the last ten days or so, I haven't been able to add travel documents to the evisa once set-up, the website page seems to be down. I have been setting up evisas using BRPs (when people have them) as I usually have problems with the app reading passport chips but then I can't link the two afterwards. The 'Update your Immigration Details' website was down entirely so every time you tried to log in the page was blank and you couldn't do anything, or I received the message "Sorry there is a problem with the service".

Advisor, 30 December 2024

² <https://www.gov.uk/update-uk-visas-immigration-account-details>

- Q1. Was there a general outage of the 'Update your details' website, including between 20 and 30 December 2024?
- If so, are details of such outages published anywhere during or after the event, and if so, where? Could you please provide us with data showing any such outages over the last 12 months?
 - If not, what could be an explanation for several advisors informing us that they were consistently unable to add travel documents to eVisas in a 10-day period leading up to the end of 2024?

2. Functionality to add identity documents is missing

Usually, when someone logs into the 'Update your Immigration Details' website, they can select one of three sections: 'Personal details', 'Contact details' and 'Sign in details'. To link a new passport or other identity document to their UKVI account, they need to select the '**Personal details**' section, and within that select the '**Add a new identity document**' link. However, we have received feedback regarding several issues with this functionality.

(a) Personal details section missing

We have received reports, including screenshots, from people who do not have full update functionality, because the '**Personal details**' section is entirely missing. This often appears to be a long-running problem that is indicative of a technical problem on the eVisa holder's account, but which does not seem to have a straightforward solution.

"Client has plans to return to the UK in early 2025 and is worried she might have problems boarding her flight if the system is not able to link her passport to her eVisa. Have tried the Home Office online chat for 2 months. They have said the problem is resolved, but it has not been resolved. Have since lodged a formal complaint with Home Office in an effort to get this sorted."

Advisor, November 2024

- Q2. Regarding cases where the 'Personal details' section is not visible on a person's UKVI account:
- In what circumstances does this occur?
 - How many people are affected by this?
 - What is required to fix this, and how long should a fix take?
 - Is the Home Office able to detect how many accounts are affected by this and apply a fix to all of them, or is the Home Office dependent on individuals reporting this issue to them?

(b) 'Add a new identity document' missing

Others have reported, again with screenshots, that although the 'Personal details' section is presented within their update view, there is no option to add new identity documents, as the 'add a new identity document' link is missing.

- Q3. For cases where someone can access the 'Personal details' section on their UKVI account but it does not contain a link to 'add a new identity document':
- In what circumstances does this occur?
 - How many people are affected by this?
 - What is required to fix this and how long should a fix take?

- d. Is the Home Office able to detect how many accounts are affected by this and apply a fix to all of them, or is the Home Office dependent on individuals reporting this issue to them?

(c) Prevented from adding new identity document through pending immigration application

Another known reason for people being unable to update their identity documents is if they have a pending immigration application.

In general, this affects people who have submitted an in-time immigration application to extend their leave (i.e. they have leave extended by section 3C of the Immigration Act 1971 'section 3C leave'). If someone with section 3C leave travels outside the Common Travel Area (CTA), then unless it is an application made under Appendix EU, their pending immigration application will be treated as withdrawn³. Therefore, people in this situation are advised not to travel.

Although holders of pre-settled status under the EU Settlement Scheme (EUSS) do not have their application to upgrade to settled status treated as withdrawn if they travel outside the CTA, these applications can sometimes take many months to process. During this time, if the status holder's passport expires and is renewed, they will be unable to update their UKVI account.

This was previously not a serious issue, as it did not matter which identity document was used to log in and create a share code for status checkers within the UK such as employers and landlords. However, now that carriers expect passports to be linked to eVisas, this lack of update functionality will cause more problems.

"I have EUSS pre settled status until 2027. I have applied for settled status and the decision is pending. They have retained my BRP. My UKVI account does not have my passport number as a registered document. The system refuses to allow me to add my passport details "whilst your application is currently under consideration". I can travel out of the UK but have no way of getting back in. I cannot travel to meet my parents. I called the Home Office but there were 131 other people waiting on the phone ahead of me."

Individual, Dec 2024

- Q4. Why is the system unable to handle linking new travel documents to the UKVI account of someone who has EUSS status and has made an upgrade application? When will the system be enhanced so that it can handle such updates?

3. Inability to link Home Office issued Travel Document to eVisa

We are aware that there is currently no functionality to add a 'travel document', issued by the Home Office to those with refugee status, to a UKVI account.

We also understand that the guidance to carriers⁴ makes clear that a number of physical documents continue to be proof of permission to travel to the UK, including 'a valid UK (Home Office-issued) Refugee Travel Document'.

³ Para 34K <https://www.gov.uk/guidance/immigration-rules/immigration-rules-part-1-leave-to-enter-or-stay-in-the-uk>

⁴ <https://www.gov.uk/government/publications/document-checks-and-charges-for-carriers>

However, the public facing travel guidance published⁵ by the Home Office does not make this clear, as it makes no reference to travel documents being accepted by carriers. People in this situation have been reporting to us thinking they cannot travel, and feeling very anxious. Under paragraph 13 of the Schedule to the Refugee Convention, the UK undertook that holders of travel documents issued by the UK shall be readmitted to the UK territory at any time during the period of the travel document's validity. To fully uphold this international obligation, it is crucial that these documents can be added to eVisas so that holders are able to be readmitted and are not barred by carriers. It is also crucial that individuals understand their rights.

"I have a Home Office issued travel document and it is not possible to link that travel document to my eVisa. The Home Office has admitted that it is not possible to link the Home Office issued travel documents to eVisa in UKVI account. It remains unclear how I would be accepted for boarding on a UK bound flight, without having my Home Office travel document linked to my eVisa. There is too much uncertainty and fear about travelling abroad and not being sure whether I would be allowed to board a return flight to the UK.

I have contacted the Resolution Centre, where they have informed me that it is not possible to link a Home Office travel documents to an eVisa. They have provided no further information about how I'm supposed to return to the UK without having my Home Office travel document linked to my eVisa."

Individual, December 2024

Q5. Will the Home Office update the public facing guidance and make it clear that people can travel with UK Home Office issued Refugee Travel Documents, UK Home Office issued Stateless Persons Travel Documents and other physical documents? It was previously agreed on 12 September 2024 in the Decision-Making Sub-group of the Home Office's Asylum Stakeholder Engagement Group that clear public-facing guidance would be provided for refugees wishing to travel.

4. Dual nationals unable to link identity document without posting it to Liverpool

The Update your Details page states that people can *"add an extra nationality - if you have dual nationality, for example"*.

However, in practice this does not work very easily. For example, if someone has both German and French nationalities, and applied to the EUSS with their German passport, the UKVI account will consider them to have German nationality. When this person tries to add their French passport, the UKVI system considers this a change of nationality (from German), and will insist that the person sends their passport (issued by France) to the Home Office in Liverpool. If they do this, and their French passport is successfully linked, then their UKVI account will show two identity documents - their German passport and their French passport as expected. Their French passport will become the login document.

When their German passport is renewed, and they want to link their new German passport to their UKVI account, then they will again be told that this is a change of nationality (from French) - despite the fact that their earlier German passport is clearly showing on their UKVI account.

⁵ <https://www.gov.uk/guidance/making-sure-your-evisa-is-correct-before-you-travel>

Q6. Can you update us on when we might expect improved functionality such that people do not need to send their passports through the post, especially when this concerns a nationality that the Home Office is already aware of for an individual, when there have been no other biographical changes?

5. Entries missing from the list of identity documents

We receive reports that people do not see their travel document listed in their account, under 'Personal Details' in 'Update your Immigration Details', even when the Home Office databases already appear to be aware of that travel document.

Given the stated importance of linking travel documents to eVisas, people will therefore try to use the 'Add a new identity document' functionality to add their travel document.

When they try to do that, they receive an error message saying the details are already on the Home Office system.

"I didn't have problems setting up the UKVI account but I have problems linking my passport via <https://www.gov.uk/update-uk-visas-immigration-account-details>

I set up my account with my BRP as I didn't have my passport with me at the time. When I try to upload my passport I get the error message: There is a problem: We could not update your document because the details you entered are already on our system.

The passport is not on the UKVI account so this is incorrect. I have tried many times over a few days and get the same error message each time.

I tried calling the evisa helpline that was suggested, I was 129 in the queue and it said it was an hour long. I couldn't wait that long at that expense. There were no other options of support from UKVI"

Individual, September 2024

"I can't add a passport to my UKVI account , the system says it is already in our system, but the passport is not in my account."

Individual, January 2025

We wrote⁶ to Tom Pursglove, previous Immigration Minister, about this problem in January 2024. In the letter we described exactly the same problem as we are still coming across now. The reply⁷ from February 2024 acknowledged a business logic problem that the Home Office were working to correct. From around June 2024 we were receiving reports from people that their missing identity documents were now visible, so they were no longer led to use the 'Add a new identity document' functionality which would have generated an error.

However, the error persists to this day. We understand from our work with the Digital Status Services Stakeholder Forum (D3SF) that there were some further business logic fixes that were being implemented. However, we were also told by D3SF that if a customer does experience an issue in adding a document and receiving the error that the document is already known to the Home Office, that this may be because the document details are held on a second UKVI account. D3SF told us that

⁶ <https://the3million.org.uk/publication/2024011001>

⁷ <https://the3million.org.uk/publication/2024021501>

in this scenario, customers are advised to contact the Home Office to ask for that document to be archived.

We are concerned that this problem will have grown considerably over the last few months. We are aware of many people making multiple attempts at setting up their UKVI accounts to access their eVisa. Many will have for example tried to set up a UKVI account with their passport, hit an obstacle somewhere, then gone back and made a second attempt to set up their UKVI account with their BRP instead. When they later try to add their passport to this (second) UKVI account, they receive this error.

Others, we are aware of, already had a UKVI account through having EUSS status, but were confused by the mass mailout in December 2024 and started the process of creating one. Since the terms 'UKVI account' and 'eVisa' were never used in the context of EUSS status, a great many EUSS status holders did not realise that they already had a UKVI account. This will therefore have resulted in many more instances of duplicate UKVI accounts.

Most people will be unaware of the fact that they should request one UKVI account to be archived, and we have also received reports where such 'archive requests' have not been handled properly by the Resolution Centre.

We also understand that the issue of the tens of thousands of 'merged identity' records⁸ is related to the issue of duplicate UKVI accounts. We are seeing newly created examples of 'merged identity' records, such as this one which has also been reported to the Home Office:

"This is a major GDPR breach. The third party has access to all of our client's personal information including her passport details, telephone number and email address. The third party contacted our client directly by telephone to tell her of the amalgamation"

Solicitor, January 2025

Q7. Can the Home Office urgently provide functionality for people to easily link an identity document to their UKVI account, even if that identity document is already known elsewhere in the Home Office database? This is especially urgent in the light of the advice that identity documents must be linked to UKVI accounts in order for people to be able to travel to the UK without being challenged by carriers.

6. eVisa system incorrectly dealing with ICAO-standard MRZ limitations

The Machine Readable Zone (MRZ) of a passport, national identity card, BRP or BRC is the information at the bottom of those documents, marked by a fixed length string containing only the characters A-Z, 0-9 and '<'. The International Civil Aviation Organization (ICAO) standards dictate⁹ the formatting of the MRZ. These standards set out how to deal with issues such as:

- How to truncate someone's name if it is too long to fit into the MRZ;
- How to transliterate diacritical marks (e.g. accents) on someone's name, as the MRZ does not allow such marks;

⁸<https://www.theguardian.com/uk-news/2024/mar/14/home-office-immigration-database-errors-hit-more-than-76000-people>

⁹ ICAO Document 9303, parts 3 and 4: https://www.icao.int/publications/Documents/9303_p3_cons_en.pdf
https://www.icao.int/publications/Documents/9303_p4_cons_en.pdf

- How to transliterate someone's name from a national script (e.g. Cyrillic, Arabic), as the MRZ only allows the characters A-Z; and
- How to deal with someone who only has a primary identifier, and no secondary identifiers (this happens for people who do not have a family name, and their given name is placed in the primary identifier).

The3million raised concerns about many of these issues to the previous administration from a very early stage¹⁰ of the proposals around the EUSS. We feel these have never been satisfactorily addressed. We are now seeing many more reports regarding this issue, all of which will lead to long-term, persistent eVisa maintenance problems for people.

Example 1 - name truncation

Individual A has the name 'Firstname Longsecondname Surname'. This name is in fact not truncated in their passport, as the passport complies with ICAO standards and fits within the available characters. However, the UK issued BRP has an MRZ in which 'Longsecondname' is truncated to 'Longsecondnam'. When A tried to create a UKVI account, they entered their name properly, but then received a mismatch error and were unable to proceed unless they artificially truncated their own name. Even if this were to be resolved in setting up the eVisa, they would then face the problem every time they tried to link a new ICAO-compliant identity document, because the truncated MRZ names in their new document would not match the names on their eVisa.

Example 2 - no surname

An advisor told us: *"There is an issue of passports that only have a given name (Indians, Malaysian, Chinese, Singapore etc). When uploading the passport to the eVisa account, UKVI comes back stating that there has been a change of name, and the passport can't be added. I suspect this is automated with no human involvement. Surely there must be a way of having a tick box "I only have a given name" which then leads to manual intervention? You then make a report - UKVI comes back stating name is correct and that they have to go through a "Change of Name" process and send document to Liverpool!"*

Example 3 - transliterated diacritical marks

Individual B has a name containing a 'Ü'. The ICAO standards say that this character has a choice of valid transliterations - namely 'UE' or 'UXX' or 'U'. B's national authorities transliterated his name to contain 'UXX' in the place of 'Ü' in the MRZ. When B was originally granted leave by the Home Office, which he applied for with his passport, both the Home Office's decision letter and the BRP were issued with a different name to that contained in the MRZ. The Home Office chose to select a different transliteration - namely 'U', rather than use the existing transliteration as selected by B's national authorities (UXX). This now sets up a permanent eVisa maintenance problem for B, because each time he tries to link a new identity document he will be told his name is different.

Q8. In the short term, can the Home Office add some logic to the ID scanning functionality which allows people to indicate that the MRZ does not fully reflect their name, which then leads to manual intervention and examination of the supplied passport photograph? In the longer term, can the Home Office find ways to more accurately reflect people's names as shown in

¹⁰ '128 questions to the Home Office', 9 April 2018, see question 1.22:
<https://the3million.org.uk/publication/2018040901>

the Visual Inspection Zone (VIZ - the human readable part of the passport), alongside using the MRZ for underlying business logic?

7. Unable to login to “Update your Immigration Details” website

For completeness, we wish to also re-emphasise that many people are unable to link their passports to their eVisa, because they are unable to access their eVisa at all, or because the details on their eVisa are incorrect.

This manifests in many persistent errors, when someone tries to log in to View & Prove with their date of birth and the number of the identity document that they used to create their UKVI account, most commonly one of the following:

- “Details entered do not match our records”
- “We cannot show proof of your status”
- “There is a problem with the service”

This also happens to people who were able to access their UKVI account and then inexplicably can no longer do so at a subsequent time. This is one of the main reasons people feel so insecure with the current implementation of the digital-only immigration status:

“I set up the eVisa after some difficulty. The process is not user friendly. I accessed the eVisa to check that all details were correct.

A couple of days later I attempted to log back in again in order to try to add my passport. The account would not accept my log in details. I am now locked out of my UKVI account and cannot add a passport. I therefore have no provable immigration status. I dare not travel abroad as I cannot prove my right to UK residence.”

Individual, December 2024

As indicated at the outset, all of these issues are compounded by the difficulties which individuals face in trying to get through to the Home Office, both when trying to use the web chat and when trying to speak to a staff member at the Resolution Centre. Those challenges have been set out in our feedback to Home Office officials following our last meeting with you on 17th December 2024, and for that reason, are not repeated here.

Thank you for your time in reading our assessment of the functionality to link identity documents to UKVI accounts, which will be particularly necessary for smooth travel once the ETA system is fully enforced. We look forward to your response and to our future discussion of these and related matters.

Yours sincerely,

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