



**Law  
Commission**  
Reforming the law

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# Simplification of the Immigration Rules

## Summary of report

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Report 388

14 January 2020

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# The Law Commission

The Law Commission was set up by the Law Commissions Act 1965 for the purpose of promoting the reform of the law.

The Law Commissioners are:

The Right Honourable Lord Justice Green, Chairman

Professor Sarah Green

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Professor Sarah Green and Professor Penney Lewis were appointed Law Commissioners on 1 January 2020. The terms of this report were agreed on 24 October 2019 when Stephen Lewis and Professor David Ormerod QC were Law Commissioners.

This is a summary of the full report. The text of the report is available on the Law Commission's website at <http://www.lawcom.gov.uk/project/simplifying-the-immigration-rules>.



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# Chapter 1: Introduction

- 1.1 The Immigration Rules regulate the entry into and stay in the UK of people who are subject to immigration control. They impact on millions of people each year. Yet it is widely acknowledged that they have become overly complex and unworkable. The Law Commission was asked to review the Rules to identify principles under which they could be redrafted to make them simpler and more accessible. This is a summary of our report.<sup>1</sup>
- 1.2 This project is part of our 13<sup>th</sup> programme of law reform. The sponsoring department is the Home Office. Under the terms of reference agreed, our review has not considered substantive immigration policy.
- 1.3 It is a basic principle of the rule of law that applicants for immigration leave should be able to understand the requirements they need to fulfil. The law “must be accessible and so far as possible intelligible, clear and predictable”.<sup>2</sup> Simplified and more easily accessible Rules offer increased legal certainty and transparency for applicants. For the Home Office, their benefits include better and speedier decision-making, potentially leading to a reduction in administrative reviews, appeals and judicial reviews, and to a system which is easier to maintain. A simpler and more accessible immigration system builds trust, increases public confidence and brings reputational benefit to the UK internationally.
- 1.4 In January 2019 we published a consultation paper which reviewed the Rules in order to identify the underlying causes of their complexity and to make proposals as to how they could be simplified and made more accessible.<sup>3</sup> Our consultation period ran until 3 May 2019. We received written responses from fifty individuals and organisations. We also held stakeholder events and meetings.<sup>4</sup>
- 1.5 In the consultation paper we looked at both intrinsic and extrinsic causes of complexity in the Rules. We examined the impact of a policy that has been followed of prescribing matters in detail in the Rules; we refer to this as the “prescriptive approach”. In addition, we considered matters of structure, internal organisation and drafting style, as well as the impact of amendments to the Rules.
- 1.6 We suggested that current approaches to drafting which involve extensive internal cross-referencing make the Rules difficult to navigate, and inconsistency in the use of numbering systems contributes to making the Rules difficult to follow. We explored how the techniques currently employed for amending the Rules can make the effect of changes difficult for applicants to understand. We found that this problem was

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<sup>1</sup> The report can be found at <http://www.lawcom.gov.uk/project/simplifying-the-immigration-rules>, together with an analysis of consultation responses and an impact assessment.

<sup>2</sup> T Bingham, *The Rule of Law* (2010) p 37.

<sup>3</sup> Simplification of the Immigration Rules (2019) Law Commission Consultation Paper No 242.

<sup>4</sup> Details of these are given in appendices 1 and 2 to the report.

exacerbated by the frequency of changes and uncertainty as to when new provisions come into effect. Where it was necessary to go back to older versions of the Rules, we identified that it can be difficult to know when changes had been made and to locate an earlier version of a Rule.

- 1.7 We looked at the place of the Rules within a wider system of guidance and application forms, and found that the guidance is itself confusing and suffers from many of the same problems as the Rules. We also found that the interaction between these parts of the system can itself generate complexity. We considered the extent to which online presentation can improve accessibility.
- 1.8 We asked consultees a series of questions in order to obtain their views on our analysis and provisional proposals. Our report presents these views and sets out our recommendations for reform.
- 1.9 Our first question was to ask consultees if they agreed that there was a need for an overhaul of the Rules. Support for this was unanimous. We accordingly make this our first recommendation.

## Chapter 2: Defining our principles

- 2.1 Our consultation paper proposed a set of principles to guide the redrafting of the Rules; most respondents agreed with them, with some suggestions of alternative approaches. We have amended our proposals slightly to incorporate some of these ideas.
- 2.2 Respondents agreed that the Rules should be drafted with the needs of the non-expert user in mind. This was in the main because most applicants do not have access to professional legal support. It was emphasised nevertheless that the non-expert user is not a uniform group; there is more than one type of applicant, and there are issues specific to each. Some applicants have vulnerabilities which affect accessibility. They may be unaccompanied minors, non-English speakers, or have mental health problems. While we conclude that the Rules should be drafted for a non-expert audience, there is no “one size fits all” approach.
- 2.3 We also think that a drafting approach which puts the needs of the non-expert user to the fore will be of benefit to other audiences, such as Home Office caseworkers, legal practitioners, judges and Parliamentarians, as the Rules will be easier to understand.
- 2.4 We recommend that the following principles should underpin the redrafting of the Rules:
  - (1) suitability for the non-expert user;
  - (2) comprehensiveness;
  - (3) accuracy;



- (4) clarity and accessibility;
- (5) consistency;
- (6) durability (a resilient structure that accommodates amendments); and
- (7) capacity for presentation in a digital form.

We acknowledge that there can be tension between some of these principles, and emphasise the need to reach a balance between them.

- 2.5 Our respondents also highlighted that applicants look at various sources of information when completing an application. These include Home Office guidance and application forms. They emphasised that drafting the Rules in accordance with the principles we identify may not in itself provide effective simplification and accessibility for applicants. We conclude that the principles we have identified also need to be applied to the wider system.

## Chapter 3: The impact of complexity

- 3.3 The majority of respondents thought that the complexity of the Rules increased the number of mistakes made by applicants. The view most clearly expressed was that their complexity results in applicants failing to understand the eligibility criteria and evidential requirements for a successful application. Mistakes not only arise from the internal complexities of the Rules, but also from difficulties in navigating guidance and application forms. Respondents also argued that the complexity of the Rules increases the mistakes made by other groups, including legal professionals and the Home Office itself.
- 3.4 Respondents mostly agreed with us that simplification would reduce financial costs for applicants. Applications which have the potential to succeed would not be rejected as a result of applicants' mistakes. Support was also expressed for our suggestion that that simplification should save costs for the courts and tribunal service, and increase Home Office caseworker efficiency. A number of respondents commented on the cost and resourcing burdens which complexity in the Rules creates for businesses and Higher Education Institutions; we were provided with cost figures for Russell Group universities. Some respondents stressed the potential for benefits that cannot be quantified financially. The complexities of the application process itself can cause anxiety, and errors can have devastating consequences for applicants and their families.
- 3.5 We used these responses to help quantify the potential cost savings offered by the simplification project. These are set out in the impact assessment which accompanies the report. Projected monetised savings arise from reductions in the numbers of judicial reviews and appeals, savings in judicial reading and writing time, and improvements to Home Office caseworker efficiency. We used respondents' submissions to quantify potential savings by Russell Group universities that support immigration applications by international staff and students. We identified the potential

for savings to applicants generally through a reduction in wasted application fees, but have not been able to quantify these. We also highlight non-quantifiable benefits to health and wellbeing, and to wider public confidence in the system.

- 3.6 In total we project savings of almost £70 million over ten years.

## Chapter 4: Recent causes of length and complexity in the Rules

- 4.1 In our consultation paper, we identified three distinct recent causes of length and complexity in the Rules: the prescriptive approach to the drafting of the Rules adopted by the Home Office since 2008; the impact of the *Alvi* decision;<sup>5</sup> and the policy decision to incorporate the right to family and private life provided by article 8 of the European Convention on Human Rights (“ECHR”) within the Rules.<sup>6</sup> We also considered the interaction between these factors. We looked in particular at the way in which the prescriptive approach generates a need for frequent amendments in a cycle of “detail begetting detail”; the drive towards prescriptive detail, intended to introduce greater clarity into the Rules, instead begins to make them more confusing.
- 4.2 We asked consultees whether they agreed with our analysis. One of the principal themes raised in response was that we had not sufficiently highlighted that the frequency of changes is itself a cause of complexity, because of the difficulty of keeping up with the changes and following the process of their insertion into the Rules. Many respondents also remarked that the frequent amendments are generated by the frequency of substantive policy changes as well as by the need to fine-tune the content of prescriptive rules. Additional examples were provided to support our analysis of the “detail begets detail” cycle. Respondents pointed to other areas of frequent successive changes in the Rules where the underlying immigration policy objective has stayed the same.
- 4.3 While immigration policy is outside our terms of reference, we hope that the discussion of the way in which policy changes can contribute to complexity will be of value to the Home Office in considering the future formulation of the Rules. We also conclude that the possibility of reducing prescription, as a matter which straddles issues of policy and matters of drafting style, merits consideration as one approach to simplification.

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<sup>5</sup> *R (Alvi) v Secretary of State for the Home Department* [2012] UKSC 33, [2012] 1 WLR 2208, in which the Supreme Court decided, in summary, that requirements to be met by applicants in order to receive a grant of leave must be included in the Rules themselves.

<sup>6</sup> Simplification of the Immigration Rules (2019) Law Commission Consultation Paper No 242, ch 5.

## Chapter 5: Less prescriptive Rules?

- 5.1 Benefits which could flow from less prescription of detail include shorter and simpler Rules, ease of navigation, fewer amendments to the Rules and a more common-sense approach to decision-making. But respondents identified a number of risks, including inconsistent decision-making and a loss of transparency. These risks limit the case for the reduction of prescription across the board as a means of simplifying the Rules. The clear message arising from our consultation is that, unless trust in the quality of decision-making is regained and redress mechanisms can be relied upon to be independent and effective, reducing prescription in the Rules should only be done in specific scenarios where certainty is not compromised.
- 5.2 Respondents favoured a reduction in prescription as to evidential requirements only. This offers some of the benefits of less prescription, without the disadvantages identified. It could produce a more common-sense, flexible and purposive approach to deciding whether the qualifying criteria set out in the Rules are satisfied, without the identified disadvantages of applying subjective judgement to the substantive requirements of the Rules. We agree, and recommend that the Home Office should consider the introduction of a less prescriptive approach to evidential requirements in areas of the Rules which they consider appropriate for such an approach.
- 5.3 Non-exhaustive lists of forms of evidence could set out both specified evidence and less specifically defined categories of evidence. If specified evidence is provided, the decision-maker would accept that the criterion in question is satisfied. If evidence from the less specifically defined category is provided, the decision-maker would be required to determine, taking a purposive approach, whether the minimum standard set out in the Rule has been met. This could include a formulation such as “any other document which establishes that...”. Reasons should be given where a decision-maker decides not to accept a particular piece of evidence.
- 5.4 It is for the Home Office to decide, as a matter of policy, which areas of the Rules might benefit from a reduction in evidential prescription. We suggest that individual areas of the Rules should be individually assessed for suitability for this, with consideration of factors such as the past record of frequency of amendment for non-policy reasons. We also suggest caseworker training to adjust to a more purposive approach to evidence and to build consistency in the exercise of subjective judgement.
- 5.5 Our preference is to include both specified and indicative evidential requirements in the Rules rather than in guidance. We consider it important that a move to less prescription does not lead to a loss of certainty of outcome for applicants who are able to provide the forms of evidence that the current Rules require. That could be the result if the evidential requirements of the Rules are simply made less specific and a general discretion given to decision-makers to decide whether evidence is satisfactory.

## Chapter 6: Restructuring the Rules

- 6.1 Different structural approaches to the organisation of material have been adopted at various stages of the development of the Rules. The current version of the Rules started life as a single set of Rules in which a number of Parts contained “common provisions” applying to multiple categories of applicants. In addition there were Parts containing the requirements specific to particular categories of applicant, such as visitors, students, etc. Some recent additions to the Rules have followed the “booklet” approach, which aims to provide a particular category of applicants with the equivalent of a “booklet” reproducing those common provisions that apply to the category along with the requirements specific to the category. While there are advantages and disadvantages in both these approaches, a choice needs to be made of a single approach to the structure of the Rules which is followed consistently throughout.

### Recommended division of material

- 6.2 Before deciding which approach to the structure of the Rules is best, we thought it necessary to review the categories of material which the Rules need to contain. We recommend a division of material which groups the content of the Rules into common provisions and specific application categories or “routes”. Our recommended list of subject matter, set out in appendix 4 to the report, is also included as an appendix to this summary. A table of destinations giving the detailed reallocation of material from the current Rules is provided at appendix 5 to the report. In drawing up our recommended list we have incorporated a range of suggestions from respondents and taken note of their comments on the list that we had provisionally proposed in the consultation paper.
- 6.3 If a single set of Rules is produced, the list would effectively form its table of contents. If the “booklet” method of presentation were adopted, the specific routes of application that we have identified in the list would each be the subject of a separate booklet. The internal organisation of each booklet would reflect the sequence of the list as a whole, with the omission of any portions that were irrelevant to the particular route.

### Audit of overlapping provisions

- 6.4 Where the booklet approach has been taken, this has involved reproducing within the booklet those of the common provisions that apply to the category covered by the booklet. This has resulted in the creation of provisions whose subject-matter overlaps with the common provisions; they are often worded slightly differently. A necessary step in choosing the most appropriate structure for the Rules is to conduct an audit of these overlapping provisions. It is often unclear in the current Rules whether different wording of similar Rules is intended to produce a different effect. We recommend that the Home Office should carry out an audit of such “overlapping” provisions. The purpose of this would be to identify inconsistencies of language and to decide in each case whether a difference in effect is desired. Where no difference of effect is desired, we recommend that a uniform wording for the provision should be chosen.
- 6.5 The effect of such an audit, in our view, would be to remove unnecessary modification and produce a clearer core of common provisions. It would also make it possible to see to what extent common provisions need to be modified in their application to

particular categories. The less need there is to do so, the easier it is for an applicant to navigate a single set of Rules.

### **Presentation: a single set of Rules or booklets?**

- 6.6 With a clearer division of material and the identification of the extent to which common provisions require modification, it becomes possible to make a choice as to how best to present the material in the Rules. Our consultation paper identified three possibilities for the presentation of the Rules. The first was that a statement of a single set of Rules is both laid in Parliament and made available online. The second was that statements in booklet form are both laid in Parliament and made available online. The third presentation option combined the two approaches, involving the laying in Parliament of a single set of Rules which is re-worked editorially in order to produce booklets which are made available online.
- 6.7 The principal advantage of a single set of Rules is that it generates less text, as less duplication of common provisions would be required. The disadvantage is that users need to cross-refer between provisions relevant to their specific application and those of general application. The advantage of booklets is that they present users with all the material relevant to their application in one place. But booklets would produce much more text, as each booklet would repeat all the information and common provisions relevant to an application route. They also create a risk of inconsistencies emerging when provisions across multiple locations need to be updated.
- 6.8 We identified the three possible approaches to presentation as Options 1, 2 and 3, and asked consultees to express their preferences. It was not possible to distinguish one prevailing view. Respondents who expressed an outright preference were fairly evenly split between Options 1 and 3. Others could see benefit in more than one of the options or were undecided. Some expressed strong views against a particular option. The salient features of the consultation responses were as follows:
- (1) respondents approached the issues mainly from the perspective of the “user experience” of the Rules, albeit that some consideration was given to “process” issues such as the propensity of an option to generate errors;
  - (2) there was almost no support for Option 2;
  - (3) several respondents extolled the advantages of booklets from the point of view of the user; apart from the propensity to generate errors or inconsistencies, the main disadvantage of the booklet approach from this perspective was the risk that it might conceal the range of application routes potentially available to an applicant;
  - (4) some responses sounded notes of caution against over-estimating the advantages of booklets;
  - (5) several respondents also expressed the view that the advantages of booklets could also be achieved by sophisticated online presentation of a single set of Rules.

- 6.9 We have decided to reject Option 2, due to the risk that it generates of inconsistencies and errors, and the absence of consultee support. As we have concluded that the drafting of the Rules should be underpinned by the principle of accessibility to the non-expert user, we favour Option 3 as an interim solution pending the identification of technology that directs an online user to the Rules relevant to their application. We see it as an approach which combines the advantages of a single set of Rules with the benefits of the booklet approach for non-expert users.
- 6.10 We recognise that the Option 3 approach can only succeed if it is well-resourced, as it requires the editorial production of booklets which are consistent with the single set of Rules. We consider that this work should be undertaken by a team of experienced officials and checked to ensure legal and policy compliance by a suitably qualified person conversant with the subject-matter. If the work is carried out simultaneously with the production of the single set of Rules and of subsequent changes to them, there is no reason why there should be any variation in the text between the two versions.

### **Giving reasons for modification of common provisions**

- 6.11 Differences in wording and effect between Rules covering the same subject-matter add to the complexity of the Rules. It may not be clear what, if any, difference in effect is intended. In order to address these difficulties, we recommend that any departures from a common provision within any particular application route that is retained following the audit that we have recommended above should be highlighted in the accompanying guidance and the reason for the departure explained.

### **Definitions**

- 6.12 The current Rules do not provide a straightforward or consistent approach to the location of definitions. We recommend grouping all definitions into one alphabetical section, either at the outset of a single set of Rules, or in each booklet. We also recommend marking defined terms as they appear in the text of the Rules with a symbol such as #, and the use online of hyperlinks to direct the reader to the definition, or of hover boxes to provide the definition itself.

## **Chapter 7: Internal organisation and drafting**

- 7.1 Once the overall structure of the Rules is settled, the next step in combatting complexity is to decide the best approach to the heading, internal organisation and drafting of each Part. We make a series of recommendations in our report based on responses to our consultation questions and provisional proposals.

### **A consistent approach to titles and subheadings**

- 7.2 We recommend abandoning subtitles and using shorter titles, not normally exceeding one line of text unless necessary in the interests of clarity, that are consistent between the Index and the Rules themselves. Subheadings should also be kept reasonably



short. Both titles and subheadings should avoid initials and acronyms and give as clear an indication of the subject-matter as is consistent with the need for brevity.

- 7.3 The consensus expressed by respondents was that subheadings should not be overused or misused. Most respondents considered that their limited use aided clarity and understanding and made navigation easier. We agree, and recommend that subheadings should be used only where necessary for those purposes.

### **Overviews and tables of contents**

- 7.4 In our consultation paper we asked for preferences between tables of contents of Parts or overviews at the beginning of a Part. We thought that overviews could be helpful in providing a panoramic view of content and in flagging up the relationships between provisions. But we acknowledged that there were risks of misuse: overviews could be used simply to repeat headings, or might be relied on by the courts as an aid to interpretation and given unintended effect. Also, when Rules are amended, the need to amend the overview might be overlooked.
- 7.5 Almost all respondents preferred tables of contents, on the basis that a clear unambiguous list of contents would assist navigation in a practical and objective way. It would be easy to keep them up to date. In contrast, they thought that overviews could generate further complication, cause confusion and become overly wordy. We find their views persuasive and recommend creating a table of contents at the beginning of each Part of the Rules. We recommend against the use of overviews.

### **Numbering system and subsequent insertions**

- 7.6 We recommend a three-level numbering system under which paragraphs would be numbered in numerical sequence (for example, 1.1.1, 1.1.2 and so on). Numbering would re-start in each Part. We think that this would help with navigation. It would be possible to identify from the numbering within which Part a paragraph fell, and different sections within a Part would be distinguished by the second-level digit. We recommend that letters should be used for sub-paragraphs within a paragraph, with Roman numerals used for sub-subparagraphs.
- 7.7 We also recommend a uniform system for numbering the reformulated Appendices created as a result of our restructuring of the Rules. We reject any mixed use of numbers, letters and abbreviations as confusing, and recommend numbering in a numerical sequence. We also recommend that the Appendices should be hyperlinked to the Rules. If booklets are produced, these should also use hyperlinks to refer to Appendices.
- 7.8 Respondents were mixed in their response to our suggestion of renumbering as an interim measure pending the systematic rewriting of the Rules. We are persuaded on balance by the arguments that the exercise could cause unnecessary confusion without long term benefit. We do not recommend that the exercise be undertaken.
- 7.9 We recommend a system for future insertions based on standard legislative drafting practice. This uses combinations of letters and numbers to sequence inserted Rules. We emphasise that the provision of a system for insertions is not to be taken as support for frequent amendment of the Rules. Our recommended drafting guide, at

appendix 6 to the report, includes a requirement to consider renumbering a portion of text when it has come to contain a substantial quantity of insertions.

### **Use of definitions**

- 7.10 Provisions in the current Rules presented as definitions sometimes contain substantive eligibility requirements. The majority of respondents agreed that the potential for applicants to overlook a requirement is much greater if a requirement is included in a definition. We recommend that definitions should not be used as a vehicle for importing requirements into the Rules.

### **Self-standing clauses**

- 7.11 One of the most significant barriers to navigation and understanding is the use of cross-referencing in the current Rules. Many Rules cannot be read in isolation; in order to understand a particular Rule, the reader needs to locate and understand a whole sequence of other Rules to which the Rule refers. Respondents unanimously agreed with us that such cross-referencing hinders accessibility. We recommend that paragraphs should be self-standing wherever possible, avoiding cross-reference to other paragraphs unless strictly necessary, and should state more directly what they intend to achieve.

### **Signposting**

- 7.12 We recommend signposting to other portions of the Rules or to relevant legislation, with the unanimous support of respondents. Signposting can help to remind the reader looking at a specific route of application that there are other provisions, such as general grounds of refusal, which also need to be taken into account. Where portions of the Rules use signposting, they should do so consistently.

### **Repetition within parts**

- 7.13 Respondents preferred repetition of material within Parts as a means of promoting clarity and accessibility and avoiding the need to cross-refer. They thought that the resulting increased length is a worthwhile price to pay, and also noted that well-designed online presentation reduces the impact of length. We recommend the adoption of repetition within Parts where desirable in the interests of clarity.

### **Our drafting guide**

- 7.14 We recommend the adoption of our drafting guide, set out in appendix 6 to the report, to assist drafters to maintain clear drafting and ease of navigation as the Rules change over time. Our drafting guide aims to promote consistency, use of plain English and improved formatting of the Rules. It also includes the recommendations we have made in relation to titles and subheadings, tables of contents, numbering, definitions and cross-referencing. The guide received almost unanimous support.
- 7.15 We suggest that a team of officials at the Home Office should be given responsibility for maintaining drafting consistency in the Rules. This work could be linked together with the work of maintaining the consistency of the booklets that we have recommended above.



## Chapter 8: Maintaining the improved presentation of the Rules

- 8.1 Once the Rules are re-drafted in accordance with our recommendations, it will be important to maintain their improved presentation over the course of successive changes to the Rules.

### Keeping the Rules under review

- 8.2 The current machinery for oversight of the Rules, provided by section 3(2) of the Immigration Act 1971, requires statements of changes of the Rules to be laid before Parliament. Rules are scrutinised by the Secondary Legislation Scrutiny Committee in the House of Lords over a period of 40 days. During this period a resolution may be passed by either House disapproving the statement. The criteria used by the Committee relate principally to the policy content of the changes; respondents agreed with us that this mechanism was not a suitable means of controlling complexity in the presentation of the Rules.
- 8.3 We recommend that the Home Office convene an informal advisory committee at regular intervals to review the drafting of the Rules in line with the principles we have recommended in this report. We believe that a small standing committee would develop familiarity with the Rules and could be an effective mechanism for review of their drafting from the perspective of the principles we have identified. The committee could also review the balance between the Rules and guidance, and the frequency of changes in a particular area.
- 8.4 Many respondents also thought that improved interaction between users and the Home Office after new Rules come into effect could help the Rules to work better in practice. We recommend a more structured process for receiving and responding to user feedback; a dedicated online area could work well. This would allow users to flag up errors, inconsistencies and anomalies. The forum could be structured to consolidate these comments and responses to them, indexed so as to provide an additional resource for applicants. This could speed up the rectification of any problems identified. It would also allow the Home Office to build up a composite picture of errors made in order to learn from what went wrong and relay this information to individual teams.

### Clearer presentation of changes

- 8.5 The publication of changes to the Rules in the form of a list of amendments and additions can make it difficult to understand the effect of statements of changes. We recommend that statements of changes should set out the affected portion of the text in its amended form in the style of a Keeling schedule (a schedule to a piece of amending legislation setting out the text of the legislation being amended with the amendments incorporated). We also think it would be helpful for an alert to appear alongside the current Rules to draw the attention of the user to pending changes. This would be feasible only in the online version of the Rules. The alert could provide a link to the Keeling schedule with an indication of the date when the change would come into effect.

- 8.6 In our view, if in future Rules are more clearly expressed, explanatory memoranda accompanying a statement of changes need only contain sufficient information to convey the intended effect of an amendment in language which is accessible to the non-expert.

### **Frequency of changes**

- 8.7 There was a clear consensus among respondents that frequent changes to the Rules have a detrimental impact on users, particularly non-expert users. They make the system more confusing to navigate, and make errors more likely. They also contribute to operational disconnects within the Home Office.
- 8.8 We recommend that the Home Office observe a self-imposed discipline that major changes to the Rules should be limited to one or two occasions per year. We consider that two changes per year would strike an appropriate balance between minimising the disruption of change and allowing for the evolution of immigration policy, and suggest that these should be in April and October to follow the common commencement dates that are used to bring statutory instruments into force.

## **Chapter 9: Transitional provisions and archiving**

- 9.1 Complexity can arise in the process of discerning which version of a Rule applies to an application, and in alerting and directing the applicant to a relevant earlier version.

### **Transitional provisions**

- 9.2 Where a statement of changes is silent as to whether a newly introduced Rule applies to existing applications, it will apply to such applications. Transitional provisions may be introduced to mitigate the effect of a change. They may stipulate, for example, that a Rule change applies only to applications made after that date. There may be a number of implementation dates for one set of changes. It can be difficult to understand the way in which these provisions operate.
- 9.3 We have concluded that the date from which a Rule applies should be provided in the online version of the Rules. A statement should explain whether the commencement date applies to decisions or to applications, or applies any other alternative formula. The information should be presented in a way which is readable and clearly distinguishable from the text of the Rule.

### **Archiving**

- 9.4 The ability to search an archive of earlier versions of the Rules is particularly important for applicants with complex immigration histories who have been subject to the Rules for long periods of time, or where an application has remained outstanding over an extended period of time. The existing archiving system, which provides links to previous consolidated versions of the Rules, is helpful when a user of the Rules knows that a Rule has been changed. But it is not able to provide an indication to the user of the current Rules that there was a previous version of a Rule.

- 9.5 As an interim solution, we think that the existing archive system could be improved by labelling each previous version of the Rules with a link to the statement of changes which introduced it. The link should refer to the paragraph numbers and categories of leave affected by the changes so as to make it easier to see at a glance where changes had been made.
- 9.6 As a longer-term solution, we recommend that the Home Office investigates more sophisticated ways to search the archives. We envisage that an online search facility could be developed which allows a search of versions of a Rule by keying in a date. Alternatively, the Rules could be presented online in annotated form with the level of information currently provided by [legislation.gov.uk](http://legislation.gov.uk). This would not only provide links to previous versions of the Rules, but would also offer a solution to the problems posed by incorporating changes into the Rules; the annotations identify amended portions of the Rules and give the source and commencement date of each amendment.

### **Superseded Rules**

- 9.7 We recommend that provisions of the Rules which are no longer in force should be deleted from the Rules, although it is important that they remain accessible in the archive. Where routes remain open only for the purpose of extensions of leave or indefinite leave, we recommend that the provisions should remain within the body of the Rules with an indication that the route is closed to new applicants.

## **Chapter 10: Complexity in the interaction between the Rules, guidance and application forms**

### **The publication, presentation and updating of guidance**

- 10.1 Material outside the Rules can also cause complexity. The Rules are embedded in a wider system of guidance and application forms. Many of the issues raised in considering simplification of the Rules are mirrored in the guidance. There is a consensus amongst respondents that a clear and consistent approach across all guidance would improve the accessibility of the system. We recommend that simplification of guidance should be undertaken in tandem with simplification of the Rules, with the aim of reducing guidance on any topic into a single document intended both for caseworkers and applicants.
- 10.2 The most pressing aspect of the problems with the guidance appears to us to be the lack of a central index. Respondents have emphasised the need for all relevant guidance to be cross-indexed so that there is a clear list of all guidance relevant to each immigration category. We recommend that an index should be created which lists the guidance documents relevant for each immigration category, and which gives each document a clear and informative title. It should be located in a place which is clearly conspicuous to a user of the Rules.

- 10.3 If the Rules are clearly drafted, and the guidance is clearly linked with the Rules, we agree with respondents that guidance documents should not repeat the content of the Rules, as this makes them longer and more complex. Guidance should serve to illustrate how the Rules will be applied, with illustrative worked examples and flow charts to aid understanding.
- 10.4 Where a new version of a guidance document is published, changes from previous versions of guidance should be highlighted to make it easier to understand what has been changed. We also recommend providing links in current guidance to previous versions with an indication of the period during which a particular guidance document operated. A comprehensive archiving system for out-of-date guidance would assist accessibility.
- 10.5 We recommend the introduction of a system of coordinated oversight of the content of guidance. This could ensure that coherence is maintained over time, and safeguard against delays or omissions in the updating of guidance to reflect changes in the Rules.
- 10.6 If a system is adopted for major Rule changes to be issued in accordance with common commencement dates in April and October, respondents suggested that updated volumes of guidance could be issued alongside such changes. We agree, and recommend limiting the frequency of publication of guidance so as to coincide with the publication of statements of changes. This would increase predictability for users, particularly for those users needing to plan large-scale service provision for groups such as international students.

#### **Instances where guidance contradicts the Rules or causes difficulty in practice**

- 10.7 We asked for examples of instances where the guidance contradicts the Rules and where aspects of guidance cause difficulties in practice. Respondents provided us with examples of inconsistencies and of outright errors. A selection of these responses is set out in the report with a view to illustrating pitfalls.

#### **The accessibility of application forms and the application process**

- 10.8 Respondents identified a number of issues which impeded the accessibility of application forms, and saw these problems as the cause of many errors by applicants. They pointed, for example, to difficulties in finding forms and in knowing which form to use. In particular, they thought that forms need to have clearer names which give a better indication of what types of application can be submitted on them. They identified a need to link Rules, guidance and application forms more clearly together to form one streamlined system.
- 10.9 We recommend a number of steps to improve the accessibility of application forms, including a review of titles and the provision of guidance on selecting and completing application forms which is clearly distinguished from policy guidance. We also recommend that the Rules and guidance provide clear links to the appropriate application form, and that the forms and their interaction with the wider system are subjected to regular user testing.

## Chapter 11: Accessibility and online systems

- 11.1 The online presentation of the Rules offers opportunities to simplify navigation and access. An initial “route map” of the Rules could direct users to the Parts relevant to them. The Rules themselves could be displayed with smaller portions on the screen, accompanied by hyperlinks or sidebars to navigate between requirements. Hover boxes could display definitions.

### Hyperlinks

- 11.2 Hyperlinks make the length of the Rules less of an accessibility issue. Almost all respondents agreed with us that, through hyperlinks, a common provisions approach to the presentation of the Rules could function as effectively as booklets. However, a number of suggestions were made to ensure that the navigation of the Rules through hyperlinks was as effective as possible. These included the need to check hyperlinks regularly, to provide help to users to find all provisions relevant to their category, and to open material in a new tab.
- 11.3 We agree that it will be important, if a system of hyperlinks is introduced to improve navigation, to ensure that these practical considerations are taken into account and regularly tested with users. We also suggest a user-friendly approach to indexing in order to connect all sections relevant to a category of leave, and a clear technique for distinguishing categories of leave. We point to recent thinking on legal design as a means of making legal services more user-focussed. This could provide helpful material to assist with directing users to different routes of application.
- 11.4 We recommend that the Home Office work towards producing a single set of Rules that function as effectively online as booklets through the use of hyperlinks.

### Interface between the Rules and guidance

- 11.5 We recommend the use of hyperlinks to link guidance to the Rules in the online presentation of the Rules. If designed in conjunction with our recommendations for improving the presentation and publication of guidance, we think that this will make a significant contribution to the accessibility of the system as a whole.

### Online application forms

- 11.6 Many respondents raised issues about the online application process and in-person appointment system. Some of the concerns raised related to systemic matters, and others to teething problems following the recent roll-out of the new system. Our report takes the opportunity to set out the main themes raised by respondents, in the hope that this will be of value to the Home Office in reviewing the design of the new system.
- 11.7 Some respondents recognised the potential of the online application system to work in a simpler and more efficient way. In particular, an enthusiastic welcome was given to the facility to upload copy documents rather than providing originals.
- 11.8 It was clear that many of the immediate technical issues reported by respondents in relation to online forms could be resolved if there were quick, freely available points of

contact within the Home Office. We suggest that, in the longer term, a live chat facility could be the most effective and efficient approach.

- 11.9 More fundamental reservations were expressed about the risk of digital exclusion. We agree that it is important for the Home Office to design systems to support those who have difficulty using online services, and who may have other vulnerabilities such as age or inability to speak English. Respondents also emphasised the need for free text boxes in application forms to allow applicants to protect their credibility by explaining their answers fully where the form does not cater for their particular circumstances. We suggest that for this reason consideration should be given to greater use of free text boxes.
- 11.10 One concern raised by many respondents related to the inability to view an application form before completion. This arises because of the in-built functions in the online forms intended to channel applicant to different questions based on the answers they provide. We recommend that consideration should be given to designing a function to provide the applicant with an overview of the form prior to completion. This could include the creation of a printable version of the blank application form, or a facility to navigate through the form online in a version which the system would not allow to be submitted. Appropriate wording on the form could indicate where the need to answer a question depends on the terms of a previous answer.

### **Future technology**

- 11.11 We asked consultees if they agreed with the areas we identified as the principal ways in which modern technology could be used to help simplify the Rules in the future. These included the suggestion of a smarter digital platform which could eventually merge the applications process so that it channels applicants into the correct provisions, in effect directs the reader into a “mini booklet” providing the relevant Rules and guidance, prompts the provision of the necessary evidence, and alerts the applicant if there is something missing.
- 11.12 While most respondents agreed with our analysis, some highlighted risks and others raised other possible applications of modern technology which we had not considered. The principal concern was that overly tailored “smart forms” could push applicants into a particular route when there was another available which might be more appropriate.
- 11.13 Other respondents pointed out that smarter digital platforms need to work from the point of entry of an applicant into the system. The current online journey intended to steer applicants towards the information they need is inconsistent. In many cases, an applicant can get trapped in a frustrating closed circuit, either failing to get past a step, missing a step, or returning to a previous one. Finally, it was suggested that data insights can be used to assist caseworkers to make better decisions by allowing them to identify cases which need additional attention, and possibly referral to a more senior or more experienced decision-maker.
- 11.14 Our discussion of respondents’ views illustrates both the potential of technology to improve the accessibility of the immigration system, and the risk of creating new barriers and new forms of exclusion. As modern technology is used to improve online presentation, we suggest that these considerations could help to shape a system which remains accessible and appropriate to the needs of the user.

## Conclusion and recommendations

- 12.1 Two broader themes emerge from our recommendations. The first is a need to build trust in decision-making. Accessible Rules, clearly linked to guidance, can help to build transparency. If more open-ended evidential requirements are adopted, caseworkers will need training in a more flexible evaluative approach which involves increased interaction with applicants. Quality assurance mechanisms will be needed to ensure consistency of approach, and redress mechanisms will need to be trusted to be effective. A drafting review committee and more structured interaction with users could also help to build trust. With a more accessible and transparent system, there may be scope to simplify the Rules further by a more extensive reduction of prescription in the Rules.
- 12.2 Secondly, there is a need to improve connections across all parts of the system, and, as part of this, an organisational need for internal structures which foster consistency, ensure accessibility, and improve organisational learning. The development of well-structured and consistent Rules which adhere to common drafting principles, their possible transposition into accurate booklets, and the ability to maintain these structures over time require centralised oversight. Similarly, the interaction between Rules, guidance and forms, both in their design and in their online presentation, needs some form of centralised administration to ensure that the structure works as intended.
- 12.3 Our report sets out a list of all our recommendations at Chapter 12. The list is also reproduced in full below. The paragraph references are to the report.



## List of recommendations

### Recommendation 1.

We recommend that the Immigration Rules be overhauled.

**Paragraph 1.21**

### Recommendation 2.

We recommend that the following principles should underpin the redrafting of the Immigration Rules:

- (1) suitability for the non-expert user;
- (2) comprehensiveness;
- (3) accuracy;
- (4) clarity and accessibility;
- (5) consistency;
- (6) durability (a resilient structure that accommodates amendments); and
- (7) capacity for presentation in a digital form.

**Paragraph 2.59**

### Recommendation 3.

We recommend that the Secretary of State considers the introduction of a less prescriptive approach to evidential requirements, in the form of non-exhaustive lists, in areas of the Immigration Rules which he or she considers appropriate.

**Paragraph 5.133**

### Recommendation 4.

We recommend that in those instances where prescription is reduced, lists of evidential requirements should specify evidence which will be accepted, together with a category or categories of less specifically defined evidence which the decision-maker would consider with a view to deciding whether the underlying requirement of the Immigration Rules is satisfied.

**Paragraph 5.134**



**Recommendation 5.**

We recommend the division of the subject matter of the Immigration Rules in accordance with the list of subject-matter set out in appendix 4 to this report.

**Paragraph 6.31**

**Recommendation 6.**

We recommend that the Home Office should conduct an audit of provisions in the Immigration Rules that cover similar subject-matter with a view to identifying inconsistencies of wording and deciding whether any difference of effect is intended.

**Paragraph 6.45**

**Recommendation 7.**

We recommend that a statement of a single set of Immigration Rules and subsequent changes to them should be laid in Parliament and made available on paper and online.

**Paragraph 6.91**

**Recommendation 8.**

We recommend that, pending the identification of technology that directs an applicant to Rules relevant to their application, the Rules should be reworked editorially by a team of experienced officials and checked to ensure legal and policy compliance by a suitably qualified person conversant with the subject-matter so as to produce booklets for each category of application which are also made available on paper and online.

**Paragraph 6.92**

**Recommendation 9.**

We recommend that any difference in wording and effect between Immigration Rules covering the same subject-matter should be highlighted in guidance and the reason for it explained.

**Paragraph 6.100**

**Recommendation 10.**

We recommend that:

- (1) definitions should be grouped into a definitions section, either in a single set of Immigration Rules or in booklets, in which defined terms are presented in alphabetical order;
- (2) if the terms are defined in a booklet, only terms which are used in that booklet should be included;
- (3) terms defined in the definitions provision should be identified as such by a symbol, such as #, when they appear in the text of the Rules; and
- (4) in the online version of the Rules, hyperlinks to the definitions section or, technology permitting, hover boxes should be provided where a defined term is used.

**Paragraph 6.117**

**Recommendation 11.**

We recommend that the following principles should be applied to titles and subheadings in the Immigration Rules:

- (1) there should be one title, not a title and a subtitle;
- (2) the titles given in the Index and the Rules should be consistent;
- (3) titles and subheadings should give as full an explanation of the contents as possible, consistently with keeping them reasonably short;
- (4) titles and subheadings should not run into a second line unless necessary in the interests of clarity; and
- (5) titles and subheadings should avoid initials and acronyms.

**Paragraph 7.7**

**Recommendation 12.**

We recommend that subheadings should be used in the Immigration Rules only where necessary in the interests of clarity and understanding.

**Paragraph 7.13**

**Recommendation 13.**

We recommend that a table of contents should be placed at the beginning of each Part of the Immigration Rules.

**Paragraph 7.27**

**Recommendation 14.**

We recommend the following numbering system for the Immigration Rules:

- (1) paragraphs should be numbered in a numerical sequence;
- (2) the numbering should re-start in each Part;
- (3) it should be possible to identify from the numbering system the Part within which a paragraph falls, the use of multilevel numbering commencing with the Part number;
- (4) the numbering system should descend to three levels (1.1.1 and so on) with the middle number identifying a section within a Part; and
- (5) letters should be used for sub-paragraphs and lower case Roman numerals for sub-subparagraphs.

**Paragraph 7.38**

**Recommendation 15.**

We recommend that:

- (1) Appendices to the Immigration Rules should be numbered in a numerical sequence;
- (2) in the online version of the Rules, references to Appendices should be in the form of hyperlinks; and
- (3) to the extent that booklets are produced, these should also use hyperlinks to refer to Appendices.

**Paragraph 7.43**

### **Recommendation 16.**

We recommend that text inserted into the Immigration Rules should be numbered in accordance with the following system:

- (1) new sections or paragraphs inserted at the beginning of a Part or section should have a number preceded by a letter, starting with "A" (A1, B1, C1 and so on); a section or paragraph inserted before "A1" should be "ZA1"; for example, 1.A1.1 or 1.1.A1;
- (2) new lettered sub-paragraphs, inserted before a sub-paragraph (a), should be (za), (zb) and so on, and paragraphs inserted before (za) should be (zza), (zzb) and so on;
- (3) where text is added to the end of existing text at the same level, the numbering should continue in sequence;
- (4) new whole sections or paragraphs inserted between existing sections or paragraphs should be numbered as follows:
  - (a) new numbering inserted between 1 and 2 should be 1A, 1B, 1C and so on; for example, 1.1A.1 or 1.1.1A;
  - (b) new numbering inserted between 1A and 1B should be 1AA, 1AB, 1AC and so on;
  - (c) new numbering inserted between 1 and 1A should be 1ZA, 1ZB, 1ZC and so on (and not 1AA and so on); and
  - (d) new provisions inserted between 1A and 1AA should be 1AZA, 1AZB, 1AZC and so on;
- (5) a lower level identifier should not be added unless necessary; and
- (6) after Z or z, the sequence Z1, Z2, Z3 and so on or z1, z2, z3 and so on should be used.

**Paragraph 7.60**

### **Recommendation 17.**

We recommend that definitions should not be used in the Immigration Rules as a vehicle for importing requirements.

**Paragraph 7.69**

### **Recommendation 18.**

We recommend that, where possible, paragraphs of the Immigration Rules:

- (1) should be self-standing, avoiding cross-reference to other paragraphs unless strictly necessary; and
- (2) should state directly what they intend to achieve.

**Paragraph 7.73**

**Recommendation 19.**

We recommend that appropriate and consistent signposting to other portions of the Rules and relevant extrinsic material should be used in the Immigration Rules.

**Paragraph 7.77**

**Recommendation 20.**

We recommend that repetition within portions of the Immigration Rules should be adopted where desirable in the interest of clarity.

**Paragraph 7.88**

**Recommendation 21.**

We recommend the adoption of the drafting guide set out in appendix 6 to this report.

**Paragraph 7.110**

**Recommendation 22.**

We recommend that:

- (1) the Home Office should convene at regular intervals a committee to review the drafting of the Immigration Rules in line with the principles that we recommend in this Report;
- (2) the committee should review the interaction between the Rules and guidance;
- (3) the committee should be advisory only; and
- (4) the terms of reference of the committee should exclude consideration or review of immigration policy.

**Paragraph 8.47**

**Recommendation 23.**

We recommend that the Home Office should design a more structured process for receiving and responding to user feedback to speed up rectification of problems identified in the Immigration Rules, make responses accessible to other users, and create an internal mechanism to relay learning to teams.

**Paragraph 8.48**

**Recommendation 24.**

We recommend that:

- (1) where appropriate, statements of changes to Immigration Rules should set out the affected portion of the text in its amended form in the style of an informal Keeling schedule;
- (2) an alert should appear in the online version of the current Rules to draw attention to pending changes, with a link to the Keeling schedule and an indication of the date when the change would come into effect; and
- (3) explanatory memoranda should contain sufficient detail to convey the intended effect of a proposed amendment to the Rules in language accessible to a non-expert user.

**Paragraph 8.66**

**Recommendation 25.**

We recommend that the Home Office should follow a policy that there should be, at most, two major changes to the Immigration Rules per year, unless there is an urgent need for additional change.

**Paragraph 8.90**

**Recommendation 26.**

We recommend that:

- (1) a statement of the date from which a Rule has effect should be provided in the online version of the Immigration Rules, explaining whether the commencement date relates to decisions or applications or applies any alternative formula; and
- (2) the indication should be provided in such a way that it appears on the printed copy if a Rule is downloaded and printed.

**Paragraph 9.19**

**Recommendation 27.**

We recommend that improvements to the system for archiving previous versions of the Immigration Rules should be made, with consideration given to adopting either an online archive search facility which allows a search of versions of a Rule by keying in a date, or the presentation of the Rules in an annotated form which provides links to previous versions of the Rules.

**Paragraph 9.47**

**Recommendation 28.**

As an interim solution, as a way of improving the existing archive, we recommend that a link to the statement of changes which introduced the version of the Immigration Rules should be included in each archived version of the Rules. The link should refer to the relevant paragraph numbers and categories of leave affected by the changes.

**Paragraph 9.48**

**Recommendation 29.**

We recommend that Appendix F (Archived Immigration Rules) and paragraphs 276DI to 276AI in Part 7 (Other categories) should be omitted from the redrafted Immigration Rules.

**Paragraph 9.54**

**Recommendation 30.**

We recommend that an exercise of simplification of guidance should be undertaken in tandem with the simplification of the Immigration Rules.

**Paragraph 10.60**

**Recommendation 31.**

We recommend that the aim of the exercise to simplify guidance should be to rationalise the number of guidance documents with a view to reducing the guidance on any topic into a single document incorporating guidance both for caseworkers and applicants.

**Paragraph 10.61**

**Recommendation 32.**

We recommend that an index should be created listing the guidance documents relevant for each immigration category, and giving each document a clear and informative title. This index should be located in one place and clearly conspicuous to a user of the Immigration Rules. It should be accompanied by an explanation for non-expert users as to of the difference in the status of the Rules and guidance.

**Paragraph 10.62**

**Recommendation 33.**

We recommend that guidance should not repeat the Immigration Rules, but instead serve to illustrate how the Rules will be applied. Consideration should be given to the use of illustrative worked examples and flow charts to aid understanding.

**Paragraph 10.63**

**Recommendation 34.**

We recommend that where a new version of a guidance document is published, changes from previous versions of guidance should be highlighted to make it easier to see what has changed.

**Paragraph 10.64**

**Recommendation 35.**

We recommend that an archive of guidance should be created with links to previous versions of the guidance and an indication of the period during which a particular guidance document operated.

**Paragraph 10.65**

**Recommendation 36.**

We recommend that a system of coordinated oversight of the content of guidance should be introduced.

**Paragraph 10.66**

**Recommendation 37.**

We recommend that consideration should be given to the adoption of a practice of limiting the frequency of publication of guidance so as to coincide with the publication of statements of changes to the Immigration Rules.

**Paragraph 10.67**



**Recommendation 38.**

We recommend that the Home Office should give consideration to the following steps with a view to improving the accessibility of application forms:

- (1) a review of the titles of application forms with a view to making them clear and informative;
- (2) clear and non-technical guidance on selecting and completing application forms, which is distinguished from policy guidance;
- (3) links from the Immigration Rules and guidance to the appropriate application form;
- (4) a review of the coverage of application forms, with a view to providing an appropriate form for any application;
- (5) a timetable for the updating of applications forms, to coincide with major Rule changes;
- (6) an archive of superseded application forms; and
- (7) user testing of application forms and of the interaction between forms, Rules and guidance.

**Paragraph 10.103**

**Recommendation 39.**

We recommend that the Home Office should work towards producing a single set of Immigration Rules that function as effectively online as booklets through the use of hyperlinks. To the extent that booklets are produced, they should also include hyperlinks as an aid to navigation.

**Paragraph 11.17**

**Recommendation 40.**

We recommend the use of hyperlinks to link guidance to the Immigration Rules in the online presentation of the Rules. Where Rules are produced in booklet form, these should provide links to the guidance relevant to the immigration category dealt with by the booklet.

**Paragraph 11.29**

**Recommendation 41.**

We recommend that provision should be made for a facility to view an application form prior to completion, either through provision for a printable version of the form or a facility to navigate through the form online in a version which the system would not allow to be submitted. The wording on this version of the form should indicate where the need to answer a question depends on the terms of a previous answer.

**Paragraph 11.78**

# Appendix 1: Recommended division of material

## Introduction

Index

Part 1: How to use the Immigration Rules, to include definitions

Part 2: Leave to enter, entry clearance, leave to remain and variation of leave to enter or remain

## Common provisions

Part 3: Making applications for leave to enter, entry clearance and leave to remain

Part 4: General grounds for refusal of leave and curtailment

Part 5: Knowledge of language and life requirements for indefinite leave applications

Part 6: Common conditions of leave

## Post-decision matters: service of notices and administrative review

Part 7: Service of notices

Part 8: Administrative review

## Deportation

Part 9: Criminal deportation

## Specific routes of application

Part 10: Visitors

Part 11: Students

Part 12: Work

Part 13: Short-term work and work experience

Part 14: Business and investment

Part 15: Family members of workers, businesspersons, investors and students

Part 16: Family members of British citizens, settled persons and persons with refugee/humanitarian protection status

Part 17: Long residence and private life

Part 18: Armed forces

Part 19: ECAA<sup>7</sup> nationals and settlement

Part 20: EU citizens and family members

Part 21: Relevant Afghan citizens

Part 22: Asylum

Part 23: Temporary protection

Part 24: Stateless persons

### Appendices

Appendix 1 – Tuberculosis screening

Appendix 2 – Approved English language tests

Appendix 3 – Lists of financial institutions

Appendix 4 – Codes of practice for work (sponsors)

Appendix 5 – Shortage occupation list

Appendix 6 – Sports governing bodies

Appendix 7 – Authorised government exchange schemes

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<sup>7</sup> European Community Association Agreement with Turkey.









