



Home Office

**BIOMETRIC RESIDENCE PERMITS FOR
OVERSEAS APPLICANTS
ALTERNATIVES TO CUSTOMER
COLLECTION AT POST OFFICE**

29 May 2015

Background

After further input from larger sponsors and representatives¹ the Home Office has developed two alternatives to the customer² collecting their own BRP card package at Post Office branch selected during the Visa4UK application process.

Customers have an absolute right to be in possession of a BRP – it evidences the leave granted to them and will be their only proof of status and entitlements after their 30 day vignette expires. They have an absolute right to collect in person, subject to the presence of a Responsible Adult for customers younger than 18.

Applications from sponsors or representatives to operate either of the alternatives are predicated on the customer having agreed to pursue the alternative route.

The alternatives introduced now are intended to meet four objectives:

- to alleviate short lived, but potentially heavy and localised, pressure on Post Office branches at the start of the academic year
- to reduce the number of students younger than 18 requiring a Responsible Adult to accompany them at an in person collection, reducing footfall in Post Office branches and transport impacts on students and schools
- to recognise the right of representatives to deal with Home Office in place of their client
- to test alternative offerings with a subset of the Premium Sponsor and very large user communities

Some sponsors will already have returned to BIDMU Sections A and B of the registration forms referred to in this document. The only additional action they need to take now is to return Section C.

“Within 10 days of arrival”

There will occasionally be delays in the production or delivery of BRPs. Where this means that the customer cannot take possession of their BRP within 10 days of arrival they will be deemed to comply with that requirement if they take possession of it within 10 days of it becoming available at their chosen Post Office or ACL site.

¹ In this document “representative” means a person who is an immigration adviser regulated by OISC or who is exempt from the requirement to register with OISC because of their membership of another regulated body within the legal profession

² The migrant to whom entry clearance was granted

Alternative Collection Location (ACL)

Offered to:

- HE and FE Tier 4 sponsors who will handle more than 750 BRPs for overseas applicants during the peak period of September/October
- Other HE and FE Tier 4 sponsors where travel to the nearest Post Office collection network branch would create particular transport difficulties for students
- Schools
- Tier 2/5 Premium Sponsors, their representatives and agents
- A small group of other very large volume PBS sponsors and their representatives

Logistics:

- BRP card packages will be delivered to a site specified by the sponsor or representative.
- Each site will be allocated an ACL code, to be used during the Visa4UK application process.
- The first batch of ACL codes should be live on Visa4UK on 6 June, for forms received by 2 June. There will be several updates to the ACL data file during June and early July.
- Sponsors and representatives will be told when their ACL code is scheduled to be live on Visa4UK, and will need to manage customer expectations accordingly.
- When customers reach the Visa4UK screen *Biometric Residence Permit Collection* they should enter the ACL code in the *Alternative Location* field.
- It will not be possible to switch an application already made on Visa4UK from collection at Post Office to ACL, but third party collection will be available if required (see below).
- Where an ACL site operator needs to offer more than one site for direct delivery they can request additional ACL codes.
- Each site must comply with some basic security measures for storage of, and access to, BRP card packages. This will include checks on the staff involved (security guidance starts at page 6).
- Only staff who are nationals of an EEA state or Switzerland can operate ACL.
- The Home Office will not itself re-route card packages between ACL sites.
- A site operator can re-route card packages between its own ACL sites using its own processes after packages are received from the Home Office.

Applications:

Return the *Request for ACL* form to the relevant mailbox:

Tier 2/5 Premium Sponsors

Schools

Other Tier 4 sponsors

Representatives and other invited groups³

your Licence Manager

SCHCollection@homeoffice.gsi.gov.uk

HEICollection@homeoffice.gsi.gov.uk

LREMCollection@homeoffice.gsi.gov.uk

³ The LREM mailbox will be available from 3 June

When completing Section B of the form please pay attention to the guidance notes. The customer's name will always appear as the first line on the BRP package label, ahead of the site address as provided.

It is critical that the site address provided in Section B will **prevent** the package going **directly** to the named customer.

An unacceptable site address, because the card could go directly to a named student there, is:

Fairbright College
Falling Lane
Upper Falling
AA1 2ZZ

An acceptable version would be:

Fairbright College
c/o Tier 4 Compliance Team
Falling Lane
Upper Falling
AA1 2ZZ

When completing Section C of the form please note that you must have seen the *original* identity document, not a *copy* of it. An expired British passport may be accepted, provided it bears a good likeness of the person nominated.

Standing Authority for third party collection

Offered to:

- PBS sponsors who do not operate ACL
- Representatives who do not operate ACL
- Agents acting for representatives of Premium Sponsors.
- Also available to those operating ACL, for applications which pre-date ACL

Logistics:

- Post Office expects to have made the required changes to their processes for 15 June.
- We will take in applications now, but will not issue letters of authority until the Post Office is in a position to accept them. In the interim customers must continue to collect their BRP in person within 10 days of arrival⁴.

⁴ If the BRP of an unaccompanied customer younger than 18 needs to be collected before the standing authority arrangement is in place, please send an email titled *June 2015 collection for child* to SACollection@homeoffice.gsi.gov.uk

- The card package must be collected from the Post Office branch selected during the Visa4UK application process.
- If a customer made a mistake in branch selection on Visa4UK, has changed their mind or has had a change of circumstances the Post Office will arrange for the card package to be moved to another collection network branch, after payment of a fee.
- The Home Office **will not** become involved in requests to change Post Office branch.
- As the Post Office will undertake the required identity verification checks on the migrant customer there will be no restriction on the nationality of those nominated as a third party collector.
- Any person nominated as a third party collector who is not a national of the EEA or Switzerland must either have current leave or not require leave.
- Those nominated will be subject to the same checks as those operating ACL.
- Those approved to act as a third party collector will be provided with a letter of authority for use at a *single* named Post Office.
- The letter will normally be “good for use” at that Post Office branch for one year, unless the nominated person’s leave to enter or remain ends earlier.
- The letter will allow the nominated person to collect any package they itemise on a *Schedule* form
- The schedule may only itemise a migrant customer to whom the PBS sponsor has issued a CAS or CoS, or by whom the representative is currently instructed

Action at Post Office:

- The third party collector must present to Post Office staff their own *unexpired* identity document *as detailed* in the Home Office letter of authority.
- The customer’s passport must be presented to Post Office staff, along with the Home Office letter of authority.
- The vignette in the customer’s passport must have been endorsed by the Immigration Officer’s landing stamp on arrival in the UK
- The Post Office will refuse to proceed with the transaction if any of the documents required are missing, not as specified in the letter of authority or the vignette has not been endorsed.

Priority order of processing:

- Schools
- HE and FE institutions not operating ACL where third party collection will remove the need for a customer younger than 18 to be accompanied by a Responsible Adult
- Premium Sponsors, their representatives and agents
- Other sponsors and representatives, taking into account the likely volume of Post Office transactions to which third party collection would apply

Applications:

Return the *Request for 3P SA* form to:

SACollection@homeoffice.gsi.gov.uk

When completing Section C of the form please note that the identity document to be used by the person nominated to act as the third party collector *must be current*. Letters of authority will be “short dated” to less than one year if either the third party’s identity document or their leave to enter or remain expires sooner.

Security guidance for ACL sites

Physical security⁵

BRP packets must be stored in a safe meeting the standard Eurograde EN1143-1, or equivalent, which provides insurance cover for cash to the amount of £10,000. For reference, 1,000 BRP packets occupy approximately 1.68 cubic feet⁶.

While it is preferable to have a dedicated safe, the Home Office recognises that this will not always be cost effective either because relatively low card volumes are held or because there is marked seasonality in the card holding. As a minimum, there must be a clearly identified and segregated “BRP area” within the safe in which no other material is stored while BRPs are being stored. This might, for example, be achieved by allocating a specific and labelled shelf to BRP storage, or by filing BRPs in clearly marked trays within the safe.

The BRP safe must be located in a secure room, to which limited numbers of staff have access. Where there is a concern over the suitability of a secure room the local Police Crime Prevention Officer should be contacted for advice.

Home Office approval to handle BRPs is not a requirement for staff to access the secure room but it is a requirement for access to the BRP safe. Where a safe is used to store BRPs and other material ACL site operators may, for operational reasons, need staff who use “other material” to have access to the BRP safe. These staff will need to be approved by the Home Office in the same way as those who will handle BRPs as part of their normal duties.

The combination or key for the BRP safe must be known to, or accessible by, only those staff approved to handle BRPs. The safe must be locked whenever unattended by approved staff.

While cards must always be stored overnight, or when unattended, in an appropriate safe they do not have to be issued directly from the safe. As an example, during large student enrolment events a university registry may wish to take a batch of cards outside the secure room for issue to students. In these circumstances cards may be moved within or between sites in a locked container. The type of container used should be appropriate to the volume of cards being moved. When at an issuing point cards must remain within the sight and under the control of an approved member of staff. Cards must not be left in an area to which a person not authorised to handle them is likely to have either uncontrolled or easy access.

Personnel security

To reduce risk, site operators should ensure that only a limited number of staff handle and distribute BRPs, commensurate with the size of the card holding and the timescale for distribution where there are seasonal peaks in activity. It is not necessary to obtain such approval for mailroom staff.

Only nationals of the EEA or Switzerland will be approved to handle BRPs as part of ACL site operations.

⁵ As schools operating ACL will tend to hold very small numbers of BRPs the physical security requirement is: BRP packets must be stored securely (ie, locked away) and any key or combination must be held in a secure location to which only those employees who are approved to distribute BRPs have access.

⁶ A pack of 100 BRPs has dimensions of 115mm (H) x 230mm (W) x 180mm (D)

Site operators must provide on Form ACL Section C the following details of staff nominated to handle BRPs:

- full name;
- date of birth;
- nationality;
- passport or national identity card details⁷; and
- CRB/DBS enhanced certificate number⁸

The ACL form should be sent to the relevant email addresses shown on page 3. Postal submission⁹ of these details can be arranged for any site operator that does not wish to provide them by email, although this will delay processing.

The Home Office will undertake basic background checks, which will include reference to the Police National Computer and internal Home Office records. By nominating a person the site operator confirms that the person has consented to checks being conducted.

If a nominated person fails the background checks the Home Office will notify the site operator that the person is not approved to handle BRPs but will not disclose the reason. In all other cases the Home Office will confirm that those nominated have been approved to handle BRPs.

Site operators are encouraged to submit check requests in good time. Check requests submitted by email will normally be processed within 5 working days of receipt, but may take longer during peak periods. Requests submitted by post will normally be processed within 10 working days of receipt.

Pre-processing

Some site operators may wish to complete internal administration tasks requiring the BRP package to be opened and the card detached from the carrier letter before the migrant arrives, eg, a university wanting to scan or copy the BRP to the student's file and enter data on university systems ahead of a large scale registration event.

The Home Office has no objection to such pre-processing. However when the migrant attends for collection site operators must:

- complete the bulleted actions set out at *Check the passport* below; and
- hand over to the migrant the personalised carrier letter to which the card was originally affixed.

⁷ An original document, **not** a copy, must have been seen by the employer. An expired British passport can be accepted if the photograph therein remains a good likeness of the employee.

⁸ This requirement applies **only** where the site will receive BRPs for unaccompanied children (younger than 18). This additional clearance is not required where a representative's regulatory body provides a similar level of safeguarding assurance. **For schools** all staff handling BRPs must have an enhanced DBS check and be deemed suitable by the school.

⁹ Please send an email titled *Postal submission of ACL request* to the address to which you would otherwise have emailed the ACL form. You will be contacted to discuss arrangements for postal submission.

Identity verification prior to issuing a BRP

- Check the passport:
 - It does not matter if the vignette has expired by the time BRP card collection is attempted;
 - The passport number on the vignette must be the same as on the passport;
 - The name on the vignette must be the same as on the passport and the BRP carrier letter (though note that a “long name” may have been truncated either on the vignette or on the carrier letter);
 - The photograph on the passport biodata page and on the vignette must closely resemble the face of the migrant;
 - Where the migrant entered the Common Travel Area at a point other than the United Kingdom (ie via Ireland, Guernsey, Jersey, or the Isle of Man) the passport will have been endorsed but **not the vignette**. In such cases the date on the arrival stamp in the passport must be within the thirty day validity range shown on the vignette;
 - In all other cases you should expect the vignette to have been endorsed by a UK Immigration Officer, although the Officer’s landing stamp appears elsewhere. Provided the date of the landing stamp endorsement is within the thirty day validity range of the vignette this can be accepted.
- If the checks above are all satisfactory the BRP package will be opened (if not already opened during pre-processing). The card will be removed and the facial image checked against the customer. If that final check is satisfactory then the BRP package can be issued to the migrant¹⁰, having first taken a copy of the BRP for your records;
- If any of the above checks fail then the ACL site must contact BIDMU to confirm next steps by sending an email titled “Verification failure” to the appropriate email address shown on page 3¹¹. You may be asked to return the BRP package by registered post.

Audit procedures

- Check any accompanying manifest against the BRP packets delivered. Small volume deliveries will not be accompanied by a manifest, though each package is likely to have been signed for. Large volume deliveries may be accompanied by a manifest that summarises only the total number of cards in each container.
- Report any issues to the carrier immediately, such as a BRP received not being recorded on a detailed manifest that was provided, a BRP recorded on a detailed manifest appears not to have been received, total shown on a summary manifest not reconciling to pouches or cards actually received;

¹⁰ **Schools** can follow the standard practice that they adopt for receipt and safe custody of passports and in-country BRPs, ensuring that, where relevant, a student’s BRP is stored in a secure location after “issue”

¹¹ In the case of **adult customers**, the site has the option of directing the customer to notify BIDMU of the verification failure. Customers cannot themselves use the email addresses on page 3, but must follow the guidance at <https://www.gov.uk/biometric-residence-permits>. In all cases the site must retain the card until advised by BIDMU to issue it or return it.

- Report to BIDMU¹² any BRPs that are not for your site, providing the BRP package numbers and await advice on next steps;
- Return any BRPs that remain uncollected having been stored by for more than 60 days – contact BIDMU to confirm arrangements in advance;
- Be able to confirm BRP movements should the need arise:
 - Reconcile BRP packets against any manifest that accompanied the delivery
 - Store any such manifest for twelve months as a record of BRP receipts
 - Have a means of determining the date when a BRP was issued to the migrant. This can be held in another auditable system or record that you use already for your business and which can be shown to Home Office staff should the need arise;
 - Maintain a log of BRPs returned to BIDMU, whether at the 60 day point or for other reasons.
- Site operators will prepare and retain¹³ for a period of three years a quarterly reconciliation in substantially the same format as the *Reconciliation* form.

Although the exemplar includes rows for each month of the quarter the site operator is free to use another sub-interval, or no sub-interval. The first quarter will begin in the month that you take delivery of your first card as an ACL site. The data below will relate to activity in the relevant quarter only, and will not be cumulative over successive quarters:

- The number of manifest errors reported to the carrier;
- The number of BRPs received that were not for the institution;
- The number of BRPs for the institution that were received from the courier and stored;
- The number of BRPs transferred between other ACL sites operated by the same sponsor or representative
- The number of BRPs issued;
- The number of BRPs returned to the Home Office;
- The number of BRPs transferred to another ACL site operated by the same sponsor or representative;
- The number of BRPs remaining in store;

If using the exemplar, the *BRPs unaccounted* for cell will auto-calculate. Any positive entry in this cell must be reported to BIDMU in the same way as for a security breach.

- Maintain details of security breaches and provide a report to BIDMU on the form supplied within two working days of discovering the breach. Where it is possible to identify the serial number of any cards lost this should be included in the report.

¹² Using the email addresses on page 3

¹³ Site operators agree to submit to the Home Office a copy of any reconciliation report(s) required, should it be asked to do so.

Effect of breaches

Repeated breaches may result in revocation of approval to store and issue BRPs.

It is not anticipated that an ACL site operator would *knowingly fail to implement* these guidelines, or *knowingly attempt to subvert* them, but such behaviour would call into question their suitability to act as a sponsor or representative.