



# **the3million submission to Independent Monitoring Authority March 2022**

## **Challenges around maintenance of UKVI account**

### **Who is the3million?**

the3million is a non-partisan grassroots organisation of EU citizens<sup>1</sup> in the UK, formed after the 2016 EU referendum to protect the rights of people who have made the UK their home. Our work ranges from monitoring the implementation of the Withdrawal Agreement, advocating for the integration of EU citizens through a pathway to citizenship, informing people of their rights, and giving EU citizens a voice in British society to change the narrative on migration.

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<sup>1</sup> EU citizens meaning citizens of one of the member states of the European Union or the European Economic Area or Switzerland, and non-EU family members or dependents

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## Summary

The UK Government has established an online portal whereby people granted EU Settlement Scheme status can view and share it. This portal is the only way for status holders to correctly prove they are able to live lawfully in the UK. It is called 'View and Prove'.

For almost a year, EU citizens have had to familiarise themselves with this service and use it to navigate their lives in the UK - for example getting jobs, accessing loans, renting properties and boarding planes. the3million set up an online tool in 2020, called 'Report-it', to receive reports from those using the View and Prove portal so they can tell us about any problems they have been experiencing with it. The tool also records the consequences these people have experienced because of those problems.

Given that the View and Prove portal is the key means by which people can prove their Withdrawal Agreement rights to live in the UK, we believe it is essential for the Independent Monitoring Authority ('IMA') to analyse our findings and respond accordingly.

This IMA report (our fourth) analyses problems reported to us associated with *maintaining* access to View and Prove. We consider the trends, analyse their implications and set out recommendations for the UK Government. We hope that this will assist the IMA in its own inquiries into View and Prove, and its consideration of recommendations when working with the UK Government.

The diversity and severity of problems identified demand that key questions be answered:

- Is the online View and Prove portal a digital document within the meaning of the Withdrawal Agreement?
- Is the online View and Prove portal a reasonable, proportionate, and effective means for people to prove their rights for their lifetime?
- Is the online View and Prove portal inclusive and accessible to everyone?

The progression towards digital ways of proving rights and accessing services forms part of a wider, global transition towards digitisation of public administration. In a modern world, it is essential for convenience and security. But such transitions in Government and public services are relatively uncharted and present problems, from user accessibility to technical and procedural errors. This particular transition, including the most recent expansion of digital-only right to work / rent checks to all migrants taking effect on 6 April 2022, has taken place at a fast pace and without parliamentary scrutiny. Ultimately, any digital representation of status must be workable so that everyone can access and prove their rights. Our findings suggest that View and Prove is not sustainable in its current form and meaningfully excludes people from their rights.

Our analysis raises the following key findings:

1. To maintain access to their status users must maintain multiple elements of their View and Prove account. Each point of maintenance can result in delays and errors. We have accounts of errors and delays at each point of maintenance with severe impacts ranging from loss of employment opportunities through restrictions on travel to a complete inability to view or prove status.

2. A heavy reliance on the EUSS Resolution Centre. Problems with the View and Prove portal result in contacts with the Home Office's helplines. The apparent under-resourcing of the helplines creates a serious barrier to resolving problems, with reports of staff unable to help or give progress updates, and many reports of people unable to get connected to a staff member at all.
3. View and Prove does not give access to a personal profile but only to the status record resulting from a single Home Office application via an identity document. The implications of this mean that a person can be disconnected from their status if they lose access to their identity document, have multiple Home Office applications connected to that identity document, or when the update of their status with new identity documents is delayed or fails.

Our recommendations to address some of these findings can be summarised as follows:

1. Review the design of EUSS View & Prove;
2. Address technical errors in the View & Prove and update system;
3. Improve and make changes to various process associated with EUSS View & Prove; and
4. Improve resourcing of the EUSS and UKVI Resolution Centres.

Even with these recommendations implemented, we do not believe that View and Prove in isolation is a viable means for people to prove their status. Alternatives need to be explored to ensure that people can have personal access to, and ownership of, proof of their right to live in the UK, rather than having to repeatedly obtain permission from the Home Office acting as a gatekeeper to their status.

## Chapter 1. Introduction

1. This is our fourth report to the IMA. Our first report (February 2021<sup>2</sup>) set out the key outstanding points surrounding the implementation of EU citizens' rights at the time when the IMA became operational. Our second report (August 2021<sup>3</sup>) examined in detail all areas of rights and legislation affecting EU citizens. Our third report (November 2021<sup>4</sup>) analysed the extent and impact of the delays faced in all areas of the EUSS.
2. As at the end of February 2022, the Scheme had a backlog of 300,700 EUSS applications. This did not include EUSS Family Permit applications, which are also subject to lengthy delays. A new FOIA request<sup>5</sup> has revealed that as of 31 December 2021, a staggering 101,636 applications had been pending between six months and a year, with a further 12,409 applications waiting for longer than a year. The number of applications waiting longer than six months is **eight times higher** than at 31 December 2020.
3. This fourth report focuses on the maintenance of the new digital-only immigration status. It is no longer only EU citizens who must rely on a digital-only status. It was subsequently rolled out to Hong Kong British National (Overseas) (BNO) applicants, and to anyone applying for status under the new immigration rules using the 'UK Immigration: ID Check' app<sup>6</sup>.
4. From 6 April 2022, it is no longer possible for employers or landlords to check any migrants' right to work<sup>7</sup> or right to rent<sup>8</sup> using physical documents such as biometric residence cards or permits. Instead, "BRC, BRP and FWP holders will evidence their right to work/rent using the Home Office **online service only.**"
5. We remain very concerned about the lack of any proof of status that **belongs to the individual**, whether in a physical or digital token form. Instead, every life event requiring proof of status now requires a transaction with a government website which requires understanding, digital know-how, access to technology, internet, and an email address / telephone number in hand for security confirmation codes.
6. Whilst the3million and other organisations receive many reports of people struggling to view and prove their digital-only status, we have elected to focus this report entirely on **maintaining** one's digital status. Maintenance of the digital-only status is essential to enable frictionless travel, and continued access to status and communications from the Home Office over the lifetime of the status holder.

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<sup>2</sup> [http://www.t3m.org.uk/IMA\\_report](http://www.t3m.org.uk/IMA_report)

<sup>3</sup> <https://www.the3million.org.uk/ima-report-aug-21>

<sup>4</sup> <https://www.the3million.org.uk/ima-report-nov-21>

<sup>5</sup> [https://www.whatdotheyknow.com/alaveteli\\_pro/info\\_requests/eu\\_settlement\\_scheme\\_waiting\\_tim\\_3](https://www.whatdotheyknow.com/alaveteli_pro/info_requests/eu_settlement_scheme_waiting_tim_3)

<sup>6</sup> <https://www.gov.uk/view-prove-immigration-status>

<sup>7</sup> Annex E, <https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

<sup>8</sup> Annex E, <https://www.gov.uk/government/publications/landlords-guide-to-right-to-rent-checks>

7. The document is structured as follows:
  - Chapter 2 looks at the ability to access the update process.
  - The following chapters then look at challenges and issues found within each type of update that the status holder might attempt. The grouping follows the choices presented to the status holder when they log in to the update process:
    - Chapter 3 – updating identity document without updating any other personal information at the same time
    - Chapter 4 – updating other identity document information (such as name, nationality or date of birth)
    - Chapter 5 – updating contact details (email address, telephone number, postal address)
    - Chapter 6 – updating the photo displayed in the View & Prove system
    - Chapter 7 – updating sign-in details (email address and telephone number) and adding helpers to the account.
  - Chapter 8 looks at changes to the immigration status which are initiated by the Home Office rather than by the status holder through the update process.
  - Chapter 9 examines various IT glitches that have been reported to us.
  - Chapter 10 provides a number of recommendations to the Home Office.
  - Finally, the Appendices document the current update process through a series of screenshots, as at 15 February 2022.
8. Throughout this report, unless stated otherwise, quotes are from reports to the3million using our report-it tool our Contact Us webpage, or from posts on our Facebook forum.

## Chapter 2. Accessing update process

9. In order to maintain one's status, it is a prerequisite to be able to sign in to the UKVI account at <https://www.gov.uk/update-uk-visas-immigration-account-details>. This presents a barrier to many, disproportionately affecting vulnerable citizens.

### Digital exclusion

10. We have received several reports from organisations describing the digital exclusion faced by their clients and the resulting difficulty maintaining their UKVI immigration account.
11. Citizens' Rights Project in Scotland made several comments in relation to vulnerable citizens not being able to access the system to update immigration status:

*"Older citizens have old fashioned phones and no understanding of how to do it online. People with mental difficulties will have zero chance to prove their status or do anything else. Those living alone, in poverty without the language don't always have internet at home and if they don't have family and friends, who will they ask for help?" – Citizens' Rights Project, January 2022*

12. Citizens' Rights Project also gave us an example of how much help someone needed to be able to update their status:

*"Mid-age Spanish woman with limited English and IT skills, who is also on benefits due to health issues She got in touch with us because she wanted to make sure she got the right status and because she needed to update some details and didn't know how to access her digital profile. Unable to log in to the status because system did not recognise the passport and DOB. However, we do know she has status because she has sent a PDF. As we were unable to upload a Letter of Authority, the adviser explained to the client's son how to get in touch with the resolution centre so they could find out which details were used to apply to the EUSS. Turns out that the client had used her ID to apply. We had to make an appointment to change this to her new passport as she did not know how to access her status and change her details. Client came with her partner as she did not trust she could understand everything on her own. She was overwhelmed and frustrated that everything was online. After showing her on the computer how this works, we provide a step-by-step guide on how to access, update and prove the status in English and Spanish. After this, I have been contacted by the client again because she was scared she will lost her benefits because her social worker was asking for something about her immigration status that she did not understand what it was. When I got back in touch with her everything was solved and she seems to be able to access the status with the instructions that I gave her. However, once again, the HO could have saved some stress to this person if they provide a physical proof of the status. It also shows that it does not only depend on the person holding the status, things can go wrong because the person requesting the information doesn't know how things work." – Citizens' Rights Project, January 2022*

13. A Big Issue outreach worker contacted us to explain how many people who had help to obtain status are unable to access it online, therefore also not going to be able to maintain their status long term.

*"We work with a large number of European Citizens and most of our vendors are Romanian. I am also a Romanian native and in the past year I have supported them in applying for the EU Settlement Scheme. Mostly, I've helped with referrals and interpreting during their appointment. As frontline workers, we've noticed that the local advice centres could only offer a temporary solution. Although they've supported our vendors applying to secure their immigration status, most of them are unable to access it online. For some of our vendors, we're still waiting for the Home Office decision. We do not have enough knowledge on the implications of the EU Settlement Scheme. To be quite honest with you, I feel like this is going to*

*affect them long term. It's already proven difficult to access welfare benefits, employment and housing support.” –Big Issue, January 2022*

14. Kasia Makowska, EU rights adviser at the Public Interest Law Centre (PILC), said:

*“The EU citizens we support are at high risk of homelessness, including rough sleeping, and other forms of social exclusion. They often lack basic digital literacy and access to technology, and many speak little or no English. We would estimate that around 10-15% of our homeless EU clients feel able to use the EUSS digital portal independently.*

*It is very common for rough sleepers in particular to lose personal items, including phones and identity documents, or to have these items stolen while on the streets. In recent months we have been contacted by a number of clients who have lost their IDs and therefore been unable to access their online EUSS profile.*

*Despite some improvement in the past year, many housing officers and support workers still seem to be unclear about how to check an EU citizen's immigration status. This is leading to vulnerable individuals missing out on vital welfare support or even being forced into destitution.” – PILC, February 2022*

15. A PILC client speaking anonymously said:

*“This system was created for people with easy lives.” – PILC, see also blog entry 10 March 2022<sup>9</sup>*

16. PILC also shared with us a case study of someone who would not be able to log in themselves. The fact that a status holder will need to access their status throughout their life, possibly long after certain helping individuals or organisations are around, exacerbates the problem of a digital-only status for vulnerable people.

*“We assisted a very vulnerable Polish client, GN, who has complex needs and serious mental health issues, to submit a late EUSS application. GN does not speak English and he has not seen his allocated social worker for two years. GN was quickly granted settled status and our adviser set up an email address for him so he could keep track of his status. However, GN did not feel able to manage his access himself and asked our adviser if she could manage his status through her professional email address. Our adviser had to decline, explaining to GN that he will need access to his status for the rest of his life. However, it seems uncertain that GN will be able to prove his status when he needs to.” – PILC, February 2022*

17. UK in a Changing Europe published a blog<sup>10</sup> by Catherine Barnard and Fiona Costello, both of the Faculty of Law, University of Cambridge, which includes the case of someone who has settled status, yet cannot access it:

*“a Polish national who has lived in the UK since 2013. He worked for four years and rented a house; after he lost his job, he couldn't keep up with his rent and he became homeless.*

*While on the street, all of his paperwork was lost and his ID and phone stolen. In 2021, he was given temporary accommodation under the 'everyone in' scheme. Recently, he has been asked to leave this accommodation because he cannot provide a 'share code' (digital proof of his EUSS status).*

*He told his charity adviser that someone had helped him to make an EUSS application in 2019, but he no longer has access to his ID, his national insurance number, or any of the details (email address, phone number) used to make the application. He may have had settled status granted but he has no way to find out or access it.” – UK in a Changing Europe, March 2022*

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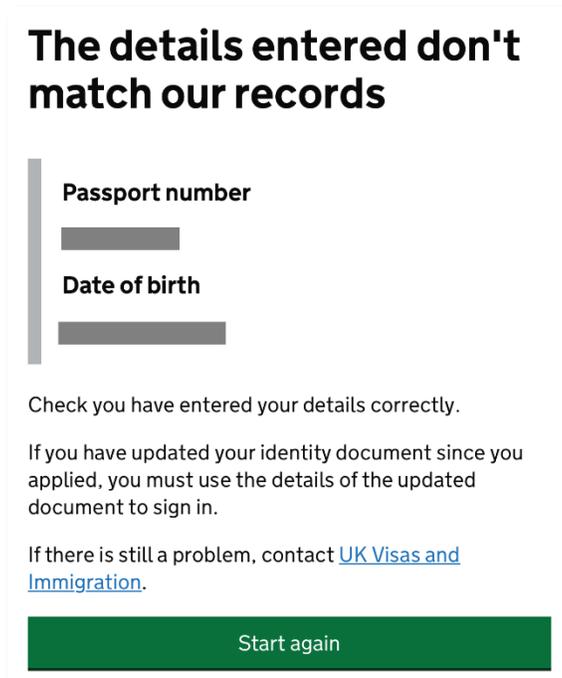
<sup>9</sup> <https://www.pilc.org.uk/blog/this-system-was-created-for-people-with-easy-lives/>

<sup>10</sup> <https://ukandeu.ac.uk/euss-applications-meritorious-suffer-from-processing-delays-unmeritorious-ones-benefit/>

## Inability to log into the system

18. We have received a large number of reports from people unable to log in to start their update process.
19. For example, this respondent had to apply for their son with an expired passport (due to Covid-related delays in renewing passports), and was unable to update their status because they could not log in. We have seen a letter from the Home Office confirming the passport number they should use to log in, along with date of birth, as well as the screenshot showing that following these instructions led to the error 'The details entered don't match our records'.

*"My son was granted status with expired passport. As we got a valid passport I tried to change the online account passport details . But I can't log in because it says: 'The details entered don't match our records'. When I called them, they asked me to send them a new passport so that they would add the new details, but I don't have the possibility to send it to them at the moment, because I have to fly back to Lithuania" – August 2021*



20. In another concerning case, the applications of two separate status holders were merged, so that means one was unable to log in and see, prove or update their own status. This particular example affected twins within the same family, but this clearly raises worrying data protection issues, since someone has logged in and seen someone else's data.

*"Twins [x] year old, boy and girl, 2 different passport numbers, 2 different applications, 2 different residence cards issued. When you input the girl's passport and DOB, you can see and prove her status, when you input the boy's passport and DOB, you see, surprise, surprise, also the girl's status (photo, name, etc). At the moment the boy is effectively illegal, he doesn't have settled status to be able to prove online as the details online are his sister's." – September 2021*

21. We have seen a case where someone's passport record was read incorrectly by the 'EU Exit: ID Document Check' app, and a number 5 was read as a letter S. When we spoke to this respondent, they explained that the Home Office had told them this could not be changed. When they told the EU Settlement Resolution Centre (EUSRC) that they were especially concerned about travelling, they were told that it would not be a problem. However, they are clearly still worried. The respondent noted how they had initially been excited about the idea of a digital status, considering it a good idea that the government was modernising, but after encountering this problem they wanted a physical document because they had lost confidence.

*"My passport number does not match with the details held by the Home Office. Called the Home Office and they explain that even though they have a copy of my passport, the App read a wrong number. My son is going to uni and I have to supply settled status (for both of us as parents) and I could not get it from the online system." – January 2022*

22. A related problem occurs for those from some EU countries who used their national identity card to apply for EUSS status. These cards contain a number which citizens of that country consider their identity number (for example the 'DNI' on Spanish national identity cards), however the "EU Exit: ID Document Check" app links their immigration account to a different number from the card. The Home Office does not inform people of this, and this issue is therefore not widely understood. We have seen multiple instances of people not being able to access their accounts or view/prove their status.

*"My friend tried to view her status just because we were aware of some issues and I'm travelling in a week's time and she was not able to access it as the system did not recognise her passport number nor the number of her Spanish ID card. She phoned the helpline and (thankfully) got through quickly. The person on the other side was able to access her details and told her that she needed to use some other number that is on her ID card. My friend wasn't even aware that a random number was on the card!" – September 2021*

## UKVI Resolution Centre (UKVI RC) and EU Settlement Resolution Centre (EUSRC)

23. The Government has acknowledged that the move to digital-only may cause problems for some, writing in correspondence to us *"We acknowledge the move away from physical documents to digital status represents a change which individuals and service providers may take time to get used to. This is why it is being rolled out incrementally and with support available to help individuals use their new status."*<sup>11</sup>

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<sup>11</sup> <https://www.the3million.org.uk/library>, April 2021

24. This support to help individuals use and maintain their new status is in the form of the UKVI RC and the EUSRC. In our November 2021 report to the IMA<sup>12</sup>, we detailed the problems getting help. In paragraph 25 of that report, we highlighted how many people could not get through to speak to a staff member at the helpline and included transcripts of how every option on the call system led to the call being terminated by the Home Office. We have since discovered by an FOIA request that in the 12 months to October 2021, 56% of calls to the EUSRC were abandoned. In July 2021, the first month that people had to rely on their digital-only status, only 31% of calls were handled. We wrote to the Home Office to convey our concerns about this<sup>13</sup>.
25. In their reply to our letter<sup>14</sup> the Home Office said they noted our comments, but highlighted that the SRC has handled over 2 million calls and emails since going live. That may well be the case, but this is a meaningless statistic. In just 12 months of the scheme, over 819,000 telephone calls were unable to be connected to the EUSRC, and behind many of the abandoned or rejected calls there will be an individual losing out on a job opportunity or struggling to prove their rights.

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<sup>12</sup> <https://www.the3million.org.uk/ima-report-nov-21>, paras 23-33.

<sup>13</sup> <https://www.the3million.org.uk/library>, January 2022

<sup>14</sup> <https://www.the3million.org.uk/library>, February 2022

## Chapter 3. Updating personal details – identity document only

### Introduction

26. This chapter covers the maintenance of immigration status with routine identity document updates, for example when an identity document expires and is renewed, or when someone has more than one identity document for the same nationality. This process is described in “*Appendix B. Screenshots: Updating personal details – identity document only*”.
27. Other updates involving identity documents, such as adding more nationalities, changing name or date of birth are covered in the following chapter.
28. When holders of pre-settled or settled status renew their passport or national identity cards, they are advised – though this is not mandatory – to update their UKVI account with their renewed document. This fact that it is not mandatory was confirmed by a Parliamentary Question answered in April 2021<sup>15</sup>.
29. The View & Prove Guidance<sup>16</sup> explains that if people travel on a document which is not linked their UKVI account, Border Force are likely to have to conduct further checks at the border. EU citizens who intend to travel with a national identity card after 1 October 2021 are told “*you should ensure that the identity card is registered to your UKVI account.*”
30. The guidance also states: “*When crossing the UK border, information will be checked digitally on arrival, and those with a UKVI account will not routinely need to prove their status. To prevent unnecessary delays at the border, it is important to ensure the document you travel on is registered to your account, which you can do by updating your details if you intend to travel on a different document (for example a new passport). When you tell us of a new document your old document will remain linked to your account, and where still valid you can use either document to travel. For example, EU, EEA and Swiss citizens who applied using a passport may also hold a national identity card. You should tell us about your identity card if you wish to use it for travel purposes or alternatively travel using your passport. If you have told us of a new document but are still awaiting confirmation that your account has been updated, you should carry your old document as well.*”
31. This guidance does not focus on what happens at foreign airports, ports and train stations when people try to check in, board or pass through security. The Home Office ‘General Partner Pack’<sup>17</sup> says (our emphasis): “***Carriers are not currently required to check*** an EU, EEA or Swiss citizen’s immigration status, or ***their entitlement to travel on a national identity card***, when deciding whether to bring them to the UK. They only need to check that they have a valid passport or national identity card.”

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<sup>15</sup> <https://questions-statements.parliament.uk/written-questions/detail/2021-03-25/175926>

<sup>16</sup> <https://www.gov.uk/government/publications/view-and-prove-your-immigration-status-evisa>

<sup>17</sup> <https://homeoffice.brandworkz.com/BMS/albums/?album=2758&lightboxAccessID=B87B00EE-9FC1-4AA9-93B4ECOAE9D275CB>

32. However, this message conflicts with the far stronger message within the same communications pack that ***“ID cards are no longer accepted for travel to the UK, unless the exceptions apply.”*** This clearly implies that carriers need to check that exceptions apply, for example by checking that a citizen has EUSS status. In practice, carriers do conduct such checks. Multiple people reported problems when travelling and for this reason updating EUSS status with new identity documents is a major concern.
33. It is not mandatory to update one's View and Prove with preferred identity documents, although there is mixed messaging around this. In practice, both carriers and UK Border Force look for evidence of EUSS status, so therefore it is a priority for people to have their View and Prove up to date.
34. In this chapter, we discuss first some general problems around the process of updating identity documents, followed by problems reported during the update process, and finally problems seen once the update process is completed.

## General problems around updating identity documents

### Access to immigration account through a changing identity document number

35. One fundamental design aspect of View & Prove and UKVI account maintenance which leads to multiple problems is the fact that, rather than accessing one's account with a stable unchanging identifier, people must access it with the last identity document number that was linked to their status. Other manifestations of this problem will be mentioned later, but here its relevance is that expired passports and national identity cards are routinely retained by many authorities when documents are renewed. Many will not realise the need to make a note of the old identity document number to access their immigration account and link their new identity document.

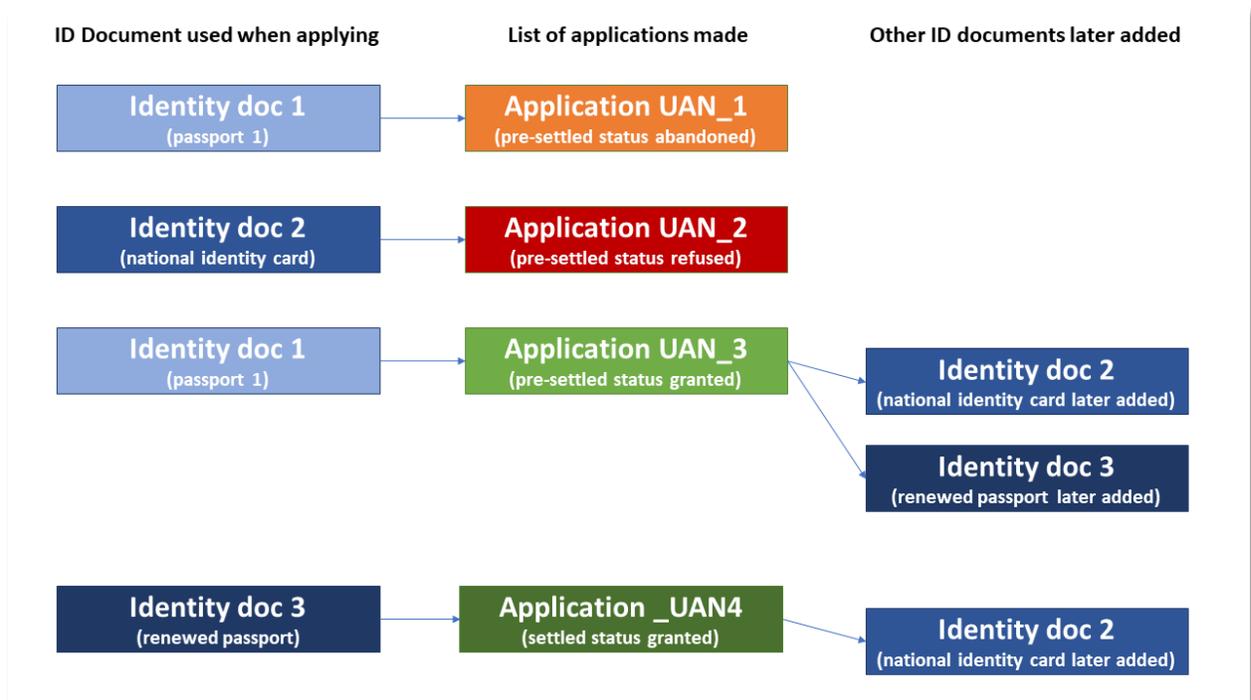
*“I had trouble accessing my status because my ID card was renewed and I didn't know the last 4 digits changed. I had then to login to change my details but was locked out. Call HO and they said this is a common problem and that I should call the EU resolution centre, which I did. However, after trying for several days, I was never able to get on the line as I was always welcomed by a recording saying that the volume of calls is high and therefore I could no longer be on a queue to have my call answered. I was only able to solve it because I managed to find a photo of my old ID card (that was left to be destroyed at the Portuguese consulate) and then logged in.” – August 2021*

36. It is a widely accepted computer science principle<sup>18</sup> that ‘primary keys’ (the key to uniquely identify a record in a dataset) should be unique, remain stable and therefore should not be changed. The View & Prove system does not adhere to this principle. While identity document numbers might be unique within one country, there is no international numbering standard guaranteeing uniqueness across countries – for example someone with an American passport could have the same passport number as someone with a German passport. Changing the primary key risks violating referential integrity, and mistakes can be made in the process rendering the data inaccessible.

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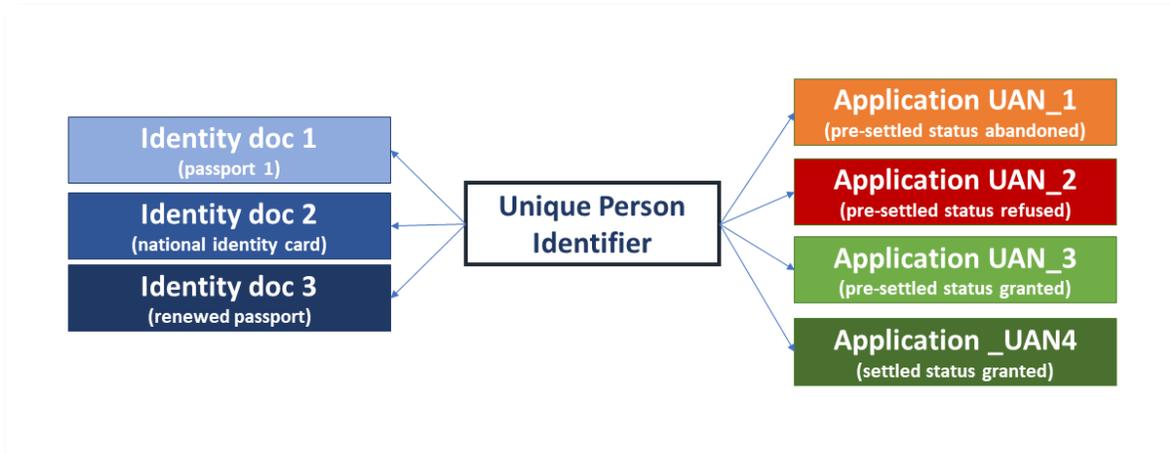
<sup>18</sup> <https://www.techrepublic.com/article/the-great-primary-key-debate> and <https://courses.lumenlearning.com/wm-computerapplicationsmgrs-2/chapter/primary-key/>

37. It could have been decided to give each *applicant* a unique key that is valid for their lifetime as soon as an initial application is made (in the same way as for example a National Insurance number). Instead, each *application* is given a unique key (UAN number). This causes problems in itself. There is no determinative way of linking one person’s pre-settled status application with a subsequent settled status application, or linking repeat applications when someone submits a new application rather than appealing a refused application. (See correspondence between the3million and the Home Office on this subject [here](#) and [here](#)<sup>19</sup>).
38. Furthermore, rather than logging into View & Prove with the UAN (which is not a unique *applicant* number, but only a unique *application* number), people are required to log in with an identity document number. People can have more than one identity document at any one time, for example they can have both a passport and a national identity card. Others applied for the EUSS with a biometric residence card which is also considered an identity document for View & Prove. Frequent travellers can have multiple identity documents for one nationality. Others have identity documents for more than one nationality. And obviously as time goes on, people have multiple versions of their identity documents through expiry and renewal.
39. Consider an example where someone had made four applications to the EUSS. The first was abandoned, the second was refused, the third was granted pre-settled status, and the fourth was granted settled status. Different applications were made with different identity documents, and status was updated with renewed identity documents as appropriate. The following picture gives an overview of the applications.

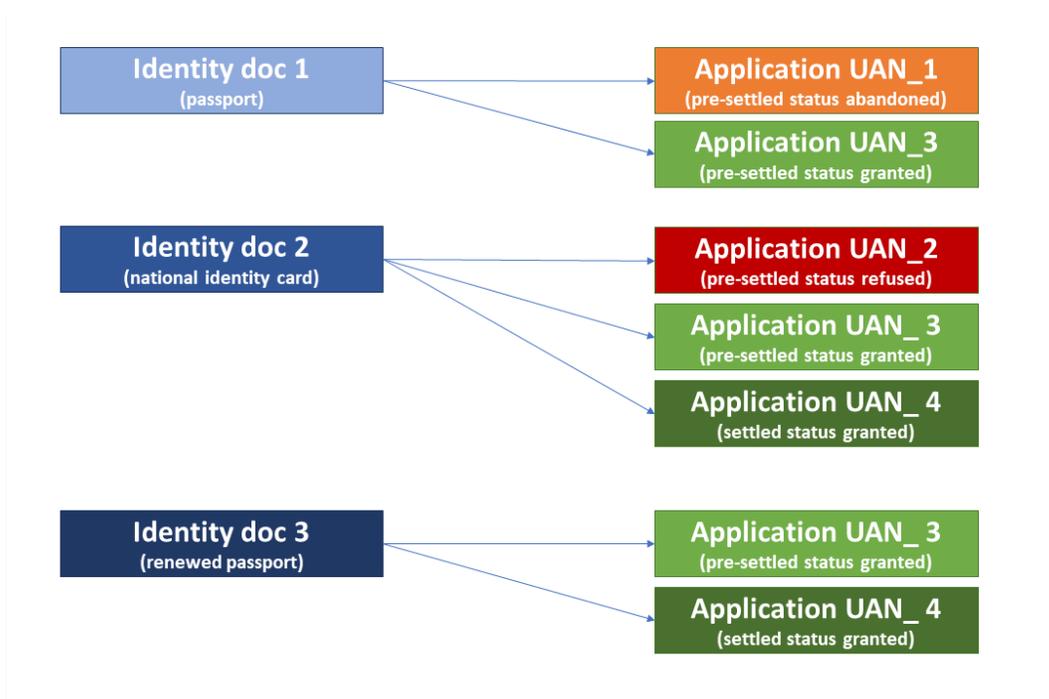


<sup>19</sup> <https://www.the3million.org.uk/library> October 2021 and December 2021, ‘identification of individuals across multiple EUSS applications’

40. Using a Unique Person Identifier to log in would make it extremely simple to provide functionality to view all related identity documents and all related applications. See the section entitled *“Unable to see full list of identity documents attached to status”* later in this chapter. It would also address the issues where someone’s incorrect status is shown – see *“Chapter 8. Change of immigration status”*.



41. Instead, the current situation is far more confusing, non-deterministic and error prone. This is fundamentally for two reasons. Firstly, because there is no unique person identifier linking different applications for the same person. Secondly, because digital EUSS status is not in fact a digital token / status belonging to the individual, independent of their current identity document. Rather, the Home Office implementation of the digital EUSS status is a login process via a tightly coupled identity document.



### Not realising the need to update

42. Many people report that they are unaware they should update their account when their passport expires, or do not know how to do it. Usually, the first time they find out there is a problem is when they return to the UK after travelling abroad. Reports suggest there is a large variability in treatment of citizens by UK Border Force officers.

*“Since my passport expired and my settled status was linked to it, they almost didn't let me in when I came back from holidays. I can't find how to re-link my settled status to my new passport, and I don't have physical proof of it (only one email). I was very anxious, I was asked “why I came into the UK” and I said, “I live here” and for a moment I thought I wouldn't have a place to go.” – October 2021*

### Pending applications cannot be updated with a different identity document

43. People who are still waiting for their status to be granted, including those with substantially delayed cases, are not able to change the identity document attached to their application. This is by design, as the Gov.UK website explains<sup>20</sup> “You cannot change your identity document or name if you're waiting for a decision on a visa application.” This is unsettling for people, especially if they are not able to retain their expired identity document.

*“While my settled status application is in progress my passport expired. I renewed it, but can't update my ID details until I'm granted my status. It's been 1 year and 10 months – it's too much time to make decisions! I'm upset, speechless.” – November 2021*

44. We speculate that a possible reason that pending applications cannot be updated with a different identity document could be related to the design decision of not having a stable unchanging primary key for each applicant.
45. The impact of not being able to update pending applications with a new identity document is most often felt at the border. This restriction, combined with the long delays in processing applications, means that many face problems entering the UK even when they are entitled to travel. One respondent made an in-time paper application with their passport but had to travel before the Home Office returned their passport. They had a valid national identity card but were unable to attach this to the settled status application. Since October 2021, EU citizens with pending application are entitled to travel with national identity cards with some conditions<sup>21</sup>, but this means they can be asked by a carrier to demonstrate that they have a pending application. This caused serious problems for this respondent:

*“I had to travel back to my home country for family reasons, using my national ID card. HO advised that I wouldn't have any issues on the way back, if anything maybe some delay at the UK border police. On the return I wasn't allowed to board my flight because, according to the airline, the HO had instructed a few days before that anyone travelling with ID cards needed to show a document proving their EUSS status with the document linked to the ID card. As you may know, people who are still in process, digital or manual, cannot update their record with a second ID document. So I'm stuck in my home country not being able to travel back to the UK. The HO is not responding on their line for calls from abroad, extremely difficult to talk to anyone on their lines. I've sent them urgent queries online (to their Resolution Centre) but they only respond with standard responses that do not answer my questions or address my situation.” – November 2021*

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<sup>20</sup> <https://www.gov.uk/update-uk-visas-immigration-account-details>

<sup>21</sup> <https://www.gov.uk/guidance/visiting-the-uk-as-an-eu-eea-or-swiss-citizen>

## Problems during the identity document update process

46. There are further obstacles even for those who have a granted status rather than a pending application, understand the need to update their immigration account with a new identity document, and have the digital skills to do so. These barriers range from problems with logging in to the immigration account, to problems with using the *online* identity document update process.
47. The problems with logging in are discussed in Chapter 2, as they are a barrier to all immigration updates and not just the identity document updates covered in this chapter. There have also been various reports of technical glitches to the entire update process, which we detail in Chapter 9. In this section we focus on technical problems specific to the update of identity documents, for example the website’s rejection of image files.

### Confusion around the ability to add new identity documents

48. The overview page of the update process clearly states that it is possible to “**add an extra identity document**”. However, the update process itself (see paragraph 237) only talks about “which personal details do you want to **update**?”. This is bad user interface design and leaves people insecure about whether to go ahead with the change. We raised this with the Home Office View & Prove team in July 2021 (see also paragraph 80). We received a reply in September 2021 saying they were “*currently working through improvements to the UKVI account to make it easier for users to add, view and manage multiple identity documents.*” We have not seen any changes in this area.
49. One person who contacted us made clear how confusing they found this, and indeed the contradictory advice they received from the Home Office on this (and worryingly, also on the ability of an EU citizen with EUSS status to travel with an identity document):

*“My current [EU] passport, with which I applied for settled status, will be expiring soon and I want to add my national ID card to my UKVI account in order to have the flexibility to travel with either document. However, the link <https://www.gov.uk/update-eu-settlement-scheme-details> only gives the option to change my identity document.*

*Having contacted twice the Home Office (tel. 03001237379) to ask for help, I am still none the wiser. The first time (14/02/2022), the officer concluded that there was a technical problem as the option “add a document”, which she said should be available, did not appear when we went through the online process together. She contacted the technical team, but the email I received from them simply provided exactly the same link I had already been using where, of course, there were the same options as before and none of them was to add a document.*

*The second time (23/02/2022), the officer said that it is not possible to add a document and I should instead change my identity document. Once I did this, he said, I would only be able to travel with the new document. Finally, he said he did not know whether travelling with an ID card was indeed possible at all and suggested I should contact the UK Visas and Immigration on 03007906268 for further information...*

*Could you please help me understand what I am supposed to do? I urgently need to travel and your advice would be much appreciated.” - February 2022*

50. This account highlights several problems. Firstly, the update process needs to be clearer that identity documents can be **added**, and the improvements mentioned by the Home Office must be urgently put in place to allow people to add, view and manage multiple identity documents. Secondly, the first EUSRC staff member did not know how the current update system works. Thirdly, the second EUSRC staff member incorrectly stated that they can then only travel with the new identity document whereas the View & Prove Guidance<sup>22</sup> explicitly states “*When you tell us of a new document your old document will remain linked to your account, and where still valid **you can use either document to travel.***” Fourthly, the second EUSRC staff member did not know that EU citizens with EUSS status can continue to travel with a national identity card.
51. Another person who contacted the3million highlighted the fact that some staff from the other (UKVI) helpline are also not aware of how the process to add an additional identity document works:

*“I just tried adding an extra identity document to my digital pre-settled status, so I can travel with my national EU Identity card in case I need to. Unfortunately, I found this to be complicated on the web service (which is sad considering I'm quite tech savvy and a software engineer) as I couldn't find the right options, and so I called the UKVI helpline about this.*

*I was told that I cannot add an extra identity document. When I pointed out the Home Office's guidance on <https://www.gov.uk/update-uk-visas-immigration-account-details>, I was told that apparently "Add an extra identity document" means "to replace your identity document".*

*I don't know if I'm alone in this issue. I know that the3million is working tirelessly for physical status - and I've been following how the Home Office contradicts themselves in this matter, but I was surprised that the Home Office doesn't even get their website to say what they mean. Have you heard anything about adding an extra identity document and the feature being removed?” - March 2022*

#### [Applicants prevented from using online update process despite no name change](#)

52. After the launch of the EUSS in March 2019, anyone needing to update their immigration account with a new identity document had to post their new identity document to the Home Office, even though the initial application had been done using an app that scanned their identity document. The Home Office promised an update by late summer 2019 to allow an online process instead, however this only became available in September 2020<sup>23</sup>.
53. The online update process is supposed to be available to those who are doing a straightforward update of their identity document after renewal. However, it appears that minor passport specification changes which are totally outside the person’s control result in still having to send identity documents through the post. For example, we have had many reports of where renewed identity documents now record unchanged names slightly differently in the Machine Readable Zone (MRZ) of the identity document, even when there is no change at all to the textual part, also known as the Visual Inspection Zone (VIZ).

*“I received my settled status in early September 2019. I have had to renew my passport since then. I have tried to enter the new passport details via the government service on the gov.uk website but each time I get an email, saying, ‘Unfortunately, we cannot accept your update because of one of the following issues:*

<sup>22</sup> <https://www.gov.uk/government/publications/view-and-prove-your-immigration-status-evisa>

<sup>23</sup> <https://europastreet.news/settled-status-headache-updating-details-after-passport-renewals/> details this delay along with examples of problems caused for those who had to send their identity documents by post

- Your new passport contains a different name format to the original document you provided.'

*The name format on the new passport is exactly the same as the previous passport. I don't have any special characters in my name that could be an issue either. I have tried to call various helplines to clear this up but I can't get any appropriate information at all. I don't know how to fix this.*

*I'm concerned that if I leave the UK at all and come back, that my new passport details will not be registered to the EU settlement scheme and I will have problems at immigration, even though I've been resident here for 24 years and applied and received my settled status already in 2019." – August 2021*

54. It is frustrating that it takes several weeks before people are informed that the update cannot be done online.

*"I have recently received a new passport and wanted to update the passport information online, being aware that this is required, and not least because I plan to travel abroad soon. I submitted the required info and picture. After over two weeks' of wait, I received a mail, yesterday, that the Home Office was 'not able to update your profile with the new document you have provide. At this stage we are only accepting updates to documents which contain like for like biographic details. Unfortunately, we cannot accept your update because of one of the following issues:*

- Your new passport contains a different Name to the original document you provided.

*I struggled to see what this referred to as both documents contained my forename, my middle name, and my surname, all of which had remained the same. I then called the indicated number, and after a very long wait in the queue, I eventually found out what the 'problem' was. In my old (German) passport, at the bottom, it repeated my surname (first), and then my forename. In the new passport, at the bottom (so not the main space where names are shown, next door to the picture, but much further below), it gave my surname, forename and middle name. Clearly, Germany had meantime decided to now include all names in that line at the bottom. It was for this very tiny detail that the proof of my new passport could now allegedly not be accepted, even though I was clearly the same person. The woman on the phone said don't worry, just restart the process, and click on 'name change' this time, and you will be able to make the change. What she did not say was that to make this change, as I then found out, I would have to send my current and valid passport to some Liverpool address, leaving me without valid travel document for a number of weeks. I cannot do this as I have already planned and booked my travel abroad next week. I think it is entirely ridiculous, as well as shameful and upsetting, that the Home Office uses such a minuscule detail to not update EU citizens' passport information. As a result, I will now not be able to digitally prove my settled status when re-entering the country. Surely, this is something the government could have sorted over the past few years." – July 2021*

55. This affects several nationalities and is likely to affect more in future as passport specifications go through iterative minor updates. From the individual's point of view, it is difficult to understand because of course they have not changed their name.

*"My old [French] ID document did not show all my middle names so I am unable to update my status to match my new passport (even though my name has not changed since birth)." – June 2021*

56. As we mentioned in our earlier reports to the IMA, these frustrations are compounded by the difficulties of getting through to the EUSRC.

*"I am German with permanent settlement status and have recently updated my passport document. Now the Home Office is telling me that they cannot accept the new passport due to my name change. The helpline number is a dead-end recording. No case number or way to respond.*

*I haven't had a name change but the new passport shows my maiden name as well as my current (clearly different and marked). I have just requested the same update again. It's stressful and I feel uncertain about my status and my travel to Germany next month." – November 2021*

Technical problems during the identity document update process

57. The online process asks people to upload a photo of their passport, which must be a JPG or JPEG file. We have had several reports from people who chose a JPG file as instructed but were faced with an error message stating “There is a problem. Your photo must be a JPG or JPEG”.

*“I followed all the instructions for uploading a photo of the new passport, but the system is not accepting it. It says Error: the file must be JPG or JPEG. My file is definitely JPG and I followed all the rules they give you. There is no phone number or button to report an issue, so I don't know what to do in order to update my passport details on the system. I will not be able to travel back to the UK with my new passport, as it will not be linked to my settled status in their system. Beyond frustrating!” – June 2021*

58. Another applicant had their image upload rejected. Following this report, we spoke to them and they told us that on a subsequent call to the EUSRC a staff member had admitted there was currently an IT problem around uploading documents. They advised our respondent to take pictures of emails in case of problems at the border in case the IT problem was not fixed by the time they needed to return to the UK.

*“My husband renewed his French passport which was about to expire. He has Settled Status in the UK (been in the UK for decades). He updated his travel document on the government portal last week (<https://www.gov.uk/update-uk-visas-immigration-account-details/update-your-ukvi-account>) and received an email today saying the request was declined, as “he had uploaded a selfie” – which is not true, he had uploaded a picture of his passport. The account was locked so you could not upload any documents; there was message saying that your request is being processed, even though we already had an email saying that had been rejected. We called the helpline, they couldn't understand why, it seems to be a classic problem of 'computer says no'. The only advice is to wait 24h. We are due to travel to France next week, if this is not resolved we will have to cancel our Christmas holidays because we cannot risk him not being allowed in on our way back to the UK. The entire family is extremely anxious. We have two children, including a baby due to meet our family in France for the first time. It will be soul crushing for everyone to have to cancel this trip. This will be the first time in two years that our family is reunited with grandparents and cousins.” – December 2021*

59. We have also received reports of where the photograph upload process works on some devices but not others. This indicates insufficient testing across operating systems and browsers. One respondent contacted the EUSRC who told them to ‘try on another device’ so it is possible that this problem occurs more regularly:

*“I obtained a new [EU country] passport and wanted to update the passport details on the GOV website. I tried and was unable to upload the picture of my new passport. There was no error message so I didn't know how to proceed, but the upload window was just not opening. I was working on a MAC using Chrome browser. I tried again the following day and it did not work. I called the Settled Status resolution centre for help, and I was told to “try on another device” - This assumes that people have more than one device at home! Some people don't even have one, let alone two. I explained that I needed my passport details to be updated asap in case I have to travel to [EU country] in an emergency. My parents are elderly, I am their only relative. I was told that if I have to travel, I should show immigration my old passport number on re-entry. I expressed that, having dealt with immigration officers many times before, I didn't think that was a viable option. I was told that it is not possible to have my passport details updated over the phone. I was able to do the update using my husband's computer, but regardless this is not acceptable. Not everyone has access to technology. We should be having a paper or stamp in our passport proving our status. This was very stressful. As I need to be ready to leave for an emergency, knowing that my settled status records wouldn't be up to date made me question whether it is safe to leave the country.” - March 2022*

60. The process contains a page informing the status holder of the requirements of the photograph (see paragraph 242). However, this page does not mention the format, dimensions and minimum / maximum size requirements of the photograph. Instead, those details are given on the next screen where the status holder is preparing to upload their photograph. It would be useful to include this information on the first screen.
61. We received reports of a number of other problems with the identity document update process. They appear to be general IT related rather than related to an individual's data and images. We elaborate on these in 'Chapter 9. IT glitches'.

## Problems after completion of the update process

### Inability to track process

62. The lack of a transparent and trackable process to update immigration accounts is problematic. An FOIA request<sup>24</sup> was submitted on 22 February 2021, asking: "How many people have been waiting for 3 months or more to have the settlement status account details updated?" It was ultimately (after much chasing correspondence) refused on 15 June 2021 on cost grounds, saying "We are not able to provide a precise figure due to complexities with how the data is logged across different systems, we would have to complete manual analysis of individual case records to obtain this data as it is not recorded in reportable field on our case management system."
63. When people make an update, they are not given any reference or case number with which to follow up with the EUSRC. This lack of a clear case number creates problems for a process that is not instantaneous, as it does not allow for progress updates or quality monitoring. Many people are understandably afraid to travel when their online status is in a state of pending update, and they cannot clearly show their status to carriers and Border Force with their valid identity document. The following report also raised a concern that the EUSRC said they are unable to see when the change would take effect on the status holder's 'side of the system' as opposed to in the systems visible by the EUSRC staff member:

*"We had renewed our passports so I realised that I needed to update these. I found the relevant page on the Home Office website <https://update-your-details.homeoffice.gov.uk/> and registered our documents on 14th May for the first time. I did not receive a confirmation email of this and when I subsequently attempted to log in with new passport details, I was unable to do so, and I realised that the details had not been updated. I made several more attempts to do this but to no avail.*

*In case of any problems there is one telephone number to contact (0300 123 7379). I rang this number on 30th June and waited 1 hour and 58 minutes until my call was answered. The person I spoke to was polite but did not understand the problem, namely that if the details of our valid passports did not match those held by the Home Office, this meant there would be a risk of not being able to enter the country. The person sought advice from another team, took me through the process again, without any result and finally made a note on our file. She said she could not confirm by email that I had contacted or that there was a problem to be investigated. I would just need to wait. Several days later I received a telephone message just before their office closing time to contact them again.*

*I tried to do this about eleven times before I could actually get into a telephone queue. Once in the queue I waited again for about two hours for the call to be answered and was then informed that there was no evidence that I had attempted to update the passport details. I was getting rather exasperated as I explained what had happened and neither the person on the phone nor those she consulted with had*

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<sup>24</sup> [https://www.whatdotheyknow.com/request/how\\_many\\_people\\_have\\_been\\_waitin](https://www.whatdotheyknow.com/request/how_many_people_have_been_waitin)

any apparent solution to the problem. By this time I had gone through the procedure of trying to register the details about for me and my son over 10 times.

Finally, the number of my new passport did appear in the system but no further details, and none of those from my son's new passport. The person was kind and told me that rather than me going on the phone again for three hours she would call me the next day prior to me having to go out for an appointment to let me know the outcome. The next morning I waited and she called me about an hour late to tell me that the number of my son's new passport had now also appeared in the system. However, she said they did not know when the details would be updated so as to be visible 'on my side of the system', or whether I would receive an email confirmation of the update. She advised that I needed to simply try again to log in with the new passport details and thereby find out if the issue had been resolved. For me, all the above has had a strong emotional impact, and I feel treated like a second-class citizen." – June 2021

64. The lack of case number also means that, according to reports we have received, the EUSRC is not able to give any progress update to callers.

"My passport is about to expire, and I received my new one from the embassy. I went to the home office website to update my details for the first time on 8 July. The process is such that you don't receive a reference number or confirmation email that you requested an update of your identity document. I hadn't heard anything so contacted the settlement resolution centre on 14 July. The case worker could not see any update nor that I had tried to update my details. She sent me through the update process on the home office website again, with her on the phone. Still haven't heard anything and have therefore contacted my MP to take this up on my behalf.

I am planning to travel soon and despite my best efforts to start the process early I have not heard from the home office which makes me feel extremely anxious. There is no communication from the home office as to how long updates of identity documents take nor any recognition that they even received the upload. I feel that this whole process and the way it's handled in the context of the hostile environment policy the government is driving for immigration completely degrading." – July 2021

65. Some people try to repeat the update process simply because they get no feedback or affirmation that the update is under way.

"I've been trying to update my new Passport to my Settled Status. I had done so and thought it was done. This week thought I'd check all is ok, only to find I could only access with EXPIRED passport. I have re-applied twice since. I have no idea where I stand. I'm following the law but the tools I was given are not fit for purpose." – July 2021

66. Others find themselves repeatedly checking their status in the hope that the update has been processed, in order to deal with their anxiety to have their status properly provable when travelling.

"I submitted my new passport details exactly 2 weeks ago via the required link having settled status. A message popped up saying my new passport details will be checked. No other email confirmation confirming my request to update. My old passport expired in May, so I now regularly check my status to see if my new passport has been added. No luck so far and today the website is down again. I dread leaving the UK to visit my mother as I might not be able to prove my settled status upon re-entering the UK." – June 2021

### Delays in update process

67. As alluded to in previous examples, the process of updating a person's immigration account can take a long time. It also appears to be inconsistent, with some people's update taking effect very quickly and others having to wait much longer.

*"In November last year I renewed my Spanish passport and told the Home Office about my new passport ID number, following their own advice on how to proceed when our personal data changes.*

*A friend of mine had done the same in October and it took only 2 weeks for her account to be updated so after seeing that no change had been done to mine, I wrote to them at the end of the month – they said they were going to update my account and I needed to wait for that to happen.*

*Right now, 5 months and a day have passed now since I requested my account data change but they haven't done my account update yet (just checked)." – April 2021*

68. The problem of the update process taking a long time appears to have been in existence since the early days of the EUSS.

*"My son is still waiting for an update of his settled status information since he provided his new passport details in September 2019. His new ID details / passport is still not online yet, which means that his new passport does not match the uploaded details provided at the time settled status has been granted. He can log on with the old / invalid passport number. However, if he would need to share settled status information, then the valid passport details would not match." – February 2021*

69. Most of the reports include contacting the EUSRC, so the Home Office must be aware of the problem. It is not clear why such updates cannot be resolved easily.

*"I have been granted pre-settled status three years ago. About two years ago I got a new passport and updated my details, which involved sending my new passport to the Home Office. I received back my passport quickly with a standard letter stating that I would be informed that I would receive confirmation once my passport has been updated. Despite frequent calls, the update hasn't been made. Today I returned to the UK for the first time since Brexit came into force in 2021. I was interrogated at the border because my current passport did not work as evidence for my pre-settled status. It made me feel uncomfortable to say the least. Eventually border control let me enter the UK, but I don't wish to be treated like this every time I enter the UK (which would make me hesitant to travel) and be at will of border force every time." – August 2021*

70. Even short delays are problematic. People have the right to travel with a renewed identity document as soon as they receive it, but the fact that the proof of (pre-)settled status is strictly connected to an identity document makes it difficult to access this right to travel.

*"I've been living in the UK for 22 years and I've had settled status for two years now. I've recently had to renew my German passport, which is linked to my settled status. The new passport has a different passport number to my old one. I used the online form to change my passport details for my settled status. At the end of the process, a message flashed up telling me that I would receive an email to confirm when the account has been updated with the new passport number.*

*A week later I'm still waiting for this email. I've checked the settled status website and it hasn't been updated.*

*In the meantime, I won't be able to return to the UK if I travel abroad. I had planned to visit my mum abroad but can't, and don't know how long I'll have to wait for this to be sorted. I'd be able to leave the UK but not return to my home. I'm worried in case there's an emergency with my elderly mother.*

*I don't know how long I'll have to wait. It could be days, weeks, or months. I've tried to phone the home office repeatedly to ask when my settled status will be updated with my new passport number but can't get through. I'm frustrated because there's no way to chase this up, as I can't get through to the Home Office on the phone." – September 2021*

71. Although some people do manage to enter the UK when travelling with a document which is not yet linked to their immigration status, others face more serious problems, depending on the Border Force officer encountered. Compare the two following accounts:

*"The passport linked with my settled status expired a few months ago and I renewed it while in [EU country]. I have since updated the details of my new passport on the Home Office website and everything seemed to be OK.... but when I flew back to [UK city], the border officer told me that he could not see my status. He let me in anyway after I confirmed my address in [UK city]. When I tried to see my status on the Home Office website, I realised that it had not been changed and was still linked to my old passport, although I had updated it more than a month before! I was lucky I dealt with a nice border officer in [UK city]. It might have been different elsewhere!" – July 2021*

*"My client has settled status. He has renewed his [EU] passport. I've updated this in the EUSS system and received a confirmation that it has been updated in June 2021. Today my client was told at the passport control in Heathrow that he does not have a visa and could not be admitted. In order to eventually be let in he lied and said that he is visiting family. My client had to go through the humiliation of being denied entry to the UK. He had a visa and nevertheless was told by the immigration officers that he did not, making him feel like a liar. What will he do next time when he has to go away and return to his home in the UK?" – September 2021*

**72. The insecurity caused by this causes many to fear travelling:**

*"The core problem is that, in order to prove my settled status, I need to provide the passport number of my old passport (the one with which I applied in 2019). They have a service which allows you to update your identity details, and I submitted the details of my new passport, but have still not received a reply, and still cannot prove my status online using my new passport. The reason this is a problem is that I would like to make a trip to France, but I don't know if I would be able to return to the UK if my current passport doesn't match the Home Office's records.*

*My father, who lives alone in Paris, recently needed urgent hospitalisation, and since then is still undergoing regular medical tests. He has significant health anxiety in general, and I want to go to Paris to be with him so that he doesn't go through it all alone. Unfortunately because of the fact that I can't prove my settled status using the same passport which I would use to cross the UK border, I know I would probably be blocked from entering the country or detained if I tried. As I write this it has been about 2 weeks since I asked for the Home Office to update my identity details and so far they haven't done so, which means I can't securely leave the UK and my father continues to suffer alone while I wait." – May 2021*

[Update not working even after confirmation received](#)

**73. We have received multiple reports from people who say they have been informed that the update of their immigration status with a new identity document is complete, but they still cannot log in with that new document.**

*"I have come across something very weird when checking my partner's and my aunt's statuses. They both cannot work with the website as their English is limited so I do things for them. Both of them had to update their documents after they were granted pre-settled statuses. My aunt now can log in with her new passport number but my partner still has to log in with his old ID number even though we have received an email that his new passport have been successfully uploaded.*

*I am worried that something will go wrong one day and because his ID has already expired, he won't have access to his online status (even though we uploaded his new passport and it was confirmed by them that it was successfully uploaded a year ago).*

*I also cannot find an easy way to contact the Home office to raise this issue." – May 2021*

**74. The error they receive is "The details entered don't match our records". We assume that if the status holder cannot log in with their new identity document details, then the UK Border Force will also be unable to see their status when scanning their identity document.**

*"I attempted to change the ID linked to my status (ID card to newer passport). I got a confirmation that it was changed but it is in fact impossible to log in with the new details, only the ones from my ID card*

work. With my passport I get the following error message: "The details entered don't match our records"" – January 2021

75. As we have reported across the board, difficulty getting through to the EUSRC exacerbates these problems.

*"I applied well in advance of any deadline and had no problem confirming my settled status. Last year I had to renew my passport and followed the instructions to update my details. I was required to send my passport in in August 2020 and after some delay received my passport back with a confirmation that the system had been updated. Trying to view my status now, I find that the system has not been updated despite what the letter said. I still need to use my old, now expired/invalid passport to log in.*

*Trying to call the resolution centre and get the following message: "we are experiencing high volumes of calls and do not have a space in our queue for your call, please call back later. [snip information how to download the form to apply etc...] Your call will now be disconnected". And then, indeed, the call is disconnected.*

*This makes me worried what might happen if I travelled abroad and tried to come back, or if I had to access health care or tried to find a new job." – October 2021*

#### Updates not visible at the border

76. We have had reports from people who have updated their UKVI account with a new identity document, have had confirmation that their account has been updated, and are able to log into View & Prove with their new identity document and generate a share code. However, the Border Force systems could not see the status linked to the identity document.

*"I was stopped at the border because the agent said that my ID did not match any settled status. I had made sure to check that this was the right ID before I left (I used the gov.uk website to change it as the previous one expired, and checked that I could generate a share code) and had already travelled in and out of the UK with it a month previous. However, he did not find it, and did not know how to use the website generated share code we get either (had to try with his phone as they're not told about the code).*

*He repeatedly asked for a paper that proved my status even after I told him that's not how settled status work. He berated me for using an ID that I had not registered on the gov.uk website (even after telling him several time that I had) and finally had to call someone at immigration on the phone to check my status. He told me that I was lucky for this time, but starting October (this was end of September), I would be put "in the hold" and wait for hours because they would not have any time to do what he had done so I had to put my ID in the gov.uk website (as I told him before, I had already done that). I've no idea what is going to happen next time, and I haven't found anything on the gov.uk website on how to deal with issues like this and how to resolve them. Since then, I called UKVI and they checked it and said there was no issue with my id card, confirmed my status was fine on their systems, and said it must be an issue with the systems at the airport. I'm worried." – October 2021*

#### No access to expired passports when travelling

77. Where people have attempted to update their UKVI account with a new identity document, but they are waiting for the change to take effect, the View & Prove guidance<sup>25</sup> states "If you have told us of a new document but are still awaiting confirmation that your account has been updated, you should carry your old document as well."

<sup>25</sup> <https://www.gov.uk/government/publications/view-and-prove-your-immigration-status-evisa>

78. However, for many people it is not possible to carry their old document, an obvious example being if their passport had been stolen. Moreover, many countries have a policy of retaining people's expired identity documents once a renewed identity document is issued. We have had multiple reports of this from citizens from Portugal, France, and Bulgaria.

*"To update the document details, you need to log in using the old document details. This is difficult when the status is associated to a passport, which is exchanged by the consulate and the old one is not available anymore when the new one is released. Luckily we had the number of the old document written in some old documentation, but this is a problem in the system. Additionally, the change of document is not instantaneous, it takes weeks if not months, when you cannot leave the country." – Portuguese citizen, March 2021*

*"With all the recent stories in the press of people with settled status being stopped at the border, we realised that the passport had to be updated. My son did that online - reasonably easy to do, although thank heavens we had kept the number of the old passport, which the French consulate had taken away when delivering the new one! But when the process was finished, there was a screen saying 'thanks, we have received your application and will get back to you' or something to that effect, without a case number, no email receipt, and no sign on the actual immigration page that you have made that application. So at the moment it is impossible for my son to go and see his father, who is in dire need of some help and company, because he is worried he will not be let back into the country or will end up in a detention centre. The application was over a week ago, and still no response from the HO. With no case number, there is no way of checking on progress, or proving to the Border Fore that it is in progress." – French citizen, May 2021*

*"I got a new passport in October and updated it (thought I had done anyway...) checked yesterday - still old passport on the system... Tried putting in the new details and on submitting got a 'Technical problem, try later' error. Renewing a Bulgarian passport involves surrendering the old one so if I need to apply for a new job (which is very probable in the nearest future) I'll have to present a new passport and have to ask the employer to see my settlement status with the number of the old passport which may be strange and a problem for the employer." – Bulgarian citizen, June 2021*

#### [Unable to see full list of identity documents attached to status](#)

79. As discussed in paragraphs 35 to 41, it is only possible to log in to View & Prove with the last identity document that was *successfully* attached to the person's immigration status.
80. When it became known that it was possible to attach more than one identity document to one's immigration status, the3million contacted the Home Office in July 2021 to ask *"Once someone has successfully added an extra identity document (e.g. they travel frequently for business, have a second passport and an identity card), do they then have to log in with the latest one they added? Or can they log in with any of them? And moreover, would it be possible for the individual to see (when logging into View and Prove) a list of all the identity documents that are linked to the status? If a list is not visible, then unless people can log in with any of their identity documents, they will feel very insecure about travelling with that document as they have no way of confirming for themselves that that particular document is linked to their status."*

81. We received a reply in September 2021, stating “When a user adds an additional identity document to their UVKI account, this automatically becomes their sign in document and only that document can be used to sign in. Any documents that have been registered to the account can be used for the purposes of travel, however, as you note, users can’t currently see those previously registered documents in their account. I can confirm that where a user adds a document, the old document (or documents, if more than one was previously added) will still be registered to their account, even if it is no longer their sign in document or visible within the account.

*We are currently working through improvements to the UKVI account to make it easier for users to add, view and manage multiple identity documents. We are currently identifying the features that will be added to the account and assessing security implications, how long it would take and how feasible it is to develop them and until we understand more of the feasibility, I am not yet able to say whether all registered documents will be visible.”*

82. We are not aware of any system changes having been made to address the above concerns.
83. We have had reports of people being unable to update their status to include another identity document, receiving the error message that their data already exists. It is possible that the status holder had forgotten that they had already added that particular identity document in the past, but on the other hand it is also possible that an abandoned application for EUSS status had been made in the past with that document. It is problematic that it is not straightforward for someone in this position to work out what the issue is.

*“I couldn't view my status online. I've also been trying to change my identity document from my ID card to my passport and get an error message that my data already exists. I tried calling the resolution centre but gave up after 30 minutes in the queue. It makes me feel insecure that if I ever have to prove it, I can't log on. Related to my other problem I worry that I can't update my ID document in time for when the current one used expires.” – May 2021*



[Complete loss of access to View & Prove after update has been completed](#)

84. As we mentioned in paragraph 36, it is against best practice to change an access key into a digital system. The most serious, and in fact most frequent, report we have had about updating the identity documents attached to immigration system is that access was lost entirely, and that the status holder could no longer log in to their account with either their original or their new identity document.

85. The update process, even when online, does not make use of an app such as the 'EU Exit: ID Document Check' to read or scan the new identity document. Rather, the status holder has to upload a photograph of the new document, and type in the new identity document number (see screenshots in "Appendix B. Screenshots: Updating personal details – identity document").
86. There are therefore several ways in which errors can be introduced – through the status holder making a mistake when entering their number, or through the Home Office caseworker making a mistake when checking the number against the identity document image, or indeed by failing to perform this check at all. The fact that on some identity documents it is difficult to distinguish the letter I from the number 1, or the letter O from the number 0 adds to this problem.
87. Since this number is crucial to the login process, the resulting risk of human error has the serious consequence of effectively blocking access to status after an update. This all reiterates the importance of the design principle of not changing the primary access key to a system.
88. We have received reports of people being locked out of their status consistently throughout 2021, from the time our Report-It tool was launched. We share a few below. This report explains that there is an admission from the Home Office that there is an IT problem.

*"I have been granted settled status in April 2019 and was always able to see it online. In February 2021 I updated my passport as per instructions on the gov website. I received an email confirmation that my document was updated but since 04/02/21 I am not able to view my status online anymore as the system is unable to find it. The problem was reported to the Home Office on 03/03/2021 and they admitted it was an IT problem as said they would have passed to the IT department. To date the issue is still unsolved and I am not able to see my status online. It makes me anxious" – reported end March 2021*

89. However, we have been concerned at the ongoing number of such reports, and an apparent inability to easily fix the IT problem.

*"I have the settled status granted since 2 years ago. I used to be able to access my UK Visas and Immigration account. After updating my details (my passport expired and I moved to a new house), I suddenly couldn't access it anymore so I can't prove I have the settled status. When inputting my details to get the code to prove, the message I get says: "The details entered don't match our records". I called the UK Visas and Immigration department, explained the issue and they said they were going to fix it and I had nothing to worry about because I have the settled status granted, they called me several times again to check if I still was unable to access my account but the problem is lasting around 3 months now and I still don't have a solution. I need to prove my immigration status when doing the marriage intent appointment to be able to get married. I might not be permitted to get married on the date it's planned due to this." – July 2021*

90. The inability to log in to View & Prove puts someone, to all intents and purposes, in the same situation as someone who does not have status at all. It is, in effect, a loss of status. This can have many consequences including losing employment opportunities.

*"I recently updated my ID document in my Settled status account as my passport had recently expired. I received an email confirmation that my details had been updated. It has now been two weeks since I cannot view or share my settled status with either document details as "the details won't match the HO records". This has been highly frustrating as I'm in the process of moving onto a new job and they have asked me for my settled status confirmation which I cannot provide...I have called the HO at least 30 times without any success to resolve this issue. It has given me a lot of anxiety to rely on this "online" confirmation of my immigration status and relying on a system that doesn't work. This is slowing down the process to move onto a new job as I cannot prove my immigration status. The only "paper"*

*confirmation I have is the letter confirmation of my settled status outcome which I can't use as confirmation in any case.” – August 2021*

91. Another commonly mentioned consequence is the fear of travelling, without being able to prove UK immigration status.

*“I've recently renewed my passport after it expired in March, the new passport has a new number and when trying to log in and update the document on the UKVI portal neither passport number is recognised and therefore I cannot log in. I'm worried this will make it difficult for me to travel or prove my status from this point onwards and it's causing me a lot of stress and anxiety. This has a huge impact on my ability to travel for work and limits my career opportunities as well as keeping me from visiting family after the pandemic and Brexit.” – September 2021*

## Chapter 4. Updating personal details – other id document changes

92. Where people need to change their name, nationality or date of birth, they are taken through a different update process, involving the need to post their identity document to the Home Office. This process is described in “*Appendix C. Screenshots: Updating personal details – other id document changes*”.
93. When it comes to name updates, there are situations where someone has changed their name, whether by marriage or other means, and is in the possession of a new identity document which reflects that name change. This type of name change is anticipated by the UKVI update process.
94. However, we have seen many reports where someone has not changed their name at all, but the UKVI update process nevertheless considers there has been a change of name. This is for example caused when a country has implemented minor passport specification updates and the formatting of names in the machine-readable zone is slightly different in renewed documents. These were covered in the previous chapter, in the section entitled ‘*Applicants prevented from using online update process despite no name change*’.
95. This chapter also covers the common situation where an existing identity document already shows more than one surname, but the EUSS status only displays the birth surname. There has been a long-running effort to change this, mostly for women to have their married name displayed when they log in to View & Prove. We document this campaign in detail below, along with an examination of the current solution which we consider still to be insufficient.
96. The UKVI update process caters for a change of date of birth. We presume this is relatively rare. We do not cover this issue in our report since we have received no reports relating to it.

### Updating nationality

97. The Gov.UK website to change immigration details<sup>26</sup> states that people can also “add an extra nationality - if you have dual nationality, for example”. We have had reports of problems in this area, though we do not know if there is a systemic issue around changing nationalities, or whether this is simply another identity document update taking an extremely long time:

*“I’ve been trying to change the nationality / passport linked to my settled status since September 2020, so it’s now a year. Twice the procedure they told me to follow was wrong. Now sent in documents in April. Still haven’t received confirmation it’s done. I still have no updated settled status, it’s attached to the old nationality. This is completely ridiculous.” – September 2021*

### Updating name where new identity document reflects a change of name

#### Delays in return of identity document

98. The UKVI update process deals with this type of name change in the same section of the process as updating an identity document, but it does not offer the online process described in “*Appendix B. Screenshots: Updating personal details – identity document*”. Instead, the system displays a screen with instructions, and a downloadable PDF (see paragraphs 253 and 254) and asks the status holder to post their identity document.

<sup>26</sup> <https://www.gov.uk/update-uk-visas-immigration-account-details>

99. It would be preferable if people could avoid sending in their identity documents, because of fears of loss or delay. We regularly receive questions from people such as:

*“I got a new German passport because I changed my surname. So I've tried updating my status online but the system says I need to post it to Liverpool. Do you have any experience from other EU citizens as to how long it took the home office to post the passport back? I'm worried they will keep it for ages and I'm left without a valid ID document.” – February 2022*

100. Often it takes a long time to return the passport, for example this respondent told us they were without their passport for four weeks. Again, these delays have consequences, as people cannot prove their status correctly linked to their new name and identity document.

*“I have changed surname and send new passport to them over 6 weeks now and after 4 weeks Home Office was able only to send me the passport back with basic letter outcome after 4 weeks that they reviewed my changes and will forward it to relevant team. The basic letter did not include my name and following changes what was made and application number. I have zero proof now that this letter was about me, the person who has been granted settled status. Now it is 6 weeks and still no update. Unable to get someone to answer the phone from Home Office to give me update. Not tracking details or chance to prove that following changes are in process and unable to check the progress and NO deadline on these changes. I understand how busy they are, but this is big chaos and no support from Home office at all. And there is many of us with this problem and still unable to check how long it will take and I for example facing issues with proving my status because my surname does not match my status in the system. I feel unable to travel and return back to UK because again details do not match.” – May 2021*

#### Delays in name change taking effect

101. As with other identity document updates, the change of name often takes a long time. One respondent told us they waited for six months, despite contacting the Home Office about the delay:

*“My wife took my name after our marriage. She sent off her passport to the Home Office in September 2020 and is still waiting for this to be updated within the app in February 2021. She has had correspondence with the Home Office who say it is in hand and will be updated in due course and that her status is unaffected but 6 months for a name change is a very long time to wait.” – February 2021*

#### Lack of transparent process around return of identity document and update taking effect

102. There is no transparent process or timeline for the return of an identity document, or for the name change to take effect. Given that most people have heard of cases where identity documents have been lost in the post, people understandably are stressed about being without their passport or national identity card.

*“I had to send my new passport to the Home Office to have my Settled Status moved onto it as I changed my name. According to Royal Mail, they should have received my passport on two weeks ago (I sent it three weeks ago). I have heard nothing at all since then, when I log in to check my status, I can see nothing has changed. I have no idea how long I should expect to wait, and I have no working contact details I can use to check. The phone number they provide for support is permanently engaged. It's impossible to even get through to an automated system. I wrote to my MP today.” – July 2021*

103. The lack of information available to the individual about either the return of their document, or the update taking effect, increases the confusion and stress surrounding the update process.

*“I have held Settled Status since January 2019. However, my last name and passport have since changed (I got married and obtained a new passport in my married name). Since the UKVI online portal indicates that it is my responsibility to ensure the details they hold for me are correct, I wished to update these. The portal advised that I was to send my new passport (original, not a copy) into the UKVI Offices via*

*recorded mail, alongside a cover letter which could be downloaded from the portal. I did this, and could see on the Royal Mail tracker that my parcel had been received at the Liverpool address below before 8am on Monday 5th July.*

*My problem is that it has now been a full five weeks and I have not yet received my passport back, nor have my details been updated on the online portal. I have phoned the contact number provided numerous times and selected every option the automated voice provides. I've only got through to two advisors but neither was able to tell me anything about the progress of my application. The second one advised that I email [traveldocumentsenquiry@homeoffice.gov.uk](mailto:traveldocumentsenquiry@homeoffice.gov.uk) which I have now done five times, to no response whatsoever. I've also asked my MP to make enquiries on my behalf, which he has done." – August 2021*

104. It is particularly concerning that there is no proper postal tracking of the return of valuable identity documents. The following report echoes what we have often seen on our social media forums, that the Home Office and Royal Mail each deny responsibility for the return of the document. This respondent told us that the EUSRC told them the return was sent:

*"...with a tracking number. Royal Mail tracking recognises the number but says they have no info. Resolution centre agent says 'not our problem'." – December 2021*

## Updating name where EUSS name does not reflect existing identity document name

### Background – reasons for names being different

105. There are many people who are known by a name which is different to that held in their identity document. Furthermore, they may be known by that (different) name on all their residence evidence in the UK – by their employers and landlords, and government departments such as HMRC, DWP, DVLA, and the NHS.

106. An example of this is married women, known by their married names, but whose EU identity documents can only show their birth name in the Machine-Readable Zone.

*"I am concerned that the Home Office gave me my Settled Status using my maiden name rather than my married name, in spite of the fact that I made the application using my married name as it is the one I actively use in my everyday life in the UK (bank account, NHS registration, HMRC etc.). My passport shows both names but the Home Office only takes the first name, which happens to be my maiden name on my passport. I'm worried it could be a problem when I have to prove my identity." – February 2021*

107. The process for applying to the EUSS deals with this by asking people what other surnames they are known by – which we believe is used in the automated checks by HMRC and DWP. However, when status is granted, it is granted in the name displayed in the Machine-Readable Zone of the identity document, which usually only contains the birth name.

*"I hold a French passport and I am married to a British citizen. My digital settled status has been issued in my maiden name due to the Machine Readable Zone on a French passport only showing a woman's maiden name. My passport page shows my maiden name and my married name. I use my married name for all official and personal purposes. How can I digitally prove I am the same person when forms/applications are filled in under a different name to my digital status? I am worried the system will let me down at most vulnerable times." – February 2021*

108. This does not only affect current married names. For example, in French passports there is an option to include a "usage" name for other reasons, including both spouses choosing to use a hyphenated surname made from both individual surnames, or someone retaining the use of a married name even after divorce.

*"I have settled status since July 2019! I'm in receipt of UC & PIP. My French passport says [maiden name] Usage [ex-married name], I have used [ex-married name] since 1978!*

*However my Home Office digital email issued has no [ex-married name]. But last week when I got this offensive threatening letter from HM Government, it only mentioned [ex-married name] & my NI number. Went online for the first time, saw my one page on Home Office site, all OK but [maiden name] only! I have long Covid, suffer many disabilities this May 21 letter has scared me, I can't afford to lose my UC?*

*Do you think they can amend my settled status to my ex married name? I am divorced but have the right keep using [ex-married name]." – June 2021*

109. This issue can also affect people who changed their name by deed poll in the UK, but who nevertheless are not able to change their EU passports. This respondent reported on behalf of a family member:

*"Employer does not accept EUSS issued in the name in his passport as all his other documents are in the name he uses. He has a deed poll to show the name change 26 years ago." – June 2021*

### Consequences from not including other surnames on EUSS

110. People whose EUSS status does not reflect the surname they use in daily life in the UK face administrative barriers in many areas. The lack of understanding, including from state departments, can lead to inappropriate advice. For example, this respondent was told by DVLA to apply for British citizenship in order to fix the problem:

*"I am a French citizen. My EUSS has been issued under my maiden name. DVLA advised me to apply for British citizenship in order to get my photo driving licence under my married name. So now I cannot obtain an updated photo driving licence from the DVLA until I obtain a British citizenship/passport costing ££££." – February 2022*

111. We have had many reports from people who were told by the Home Office and/or DWP that if they wanted their EUSS status to show their married name, they should obtain a new passport. This demonstrates a lack of understanding by UK authorities of how other countries deal with passports, birth names and married names. The following report shows this (our emphasis):

*"I have received under my married name letters from the Home office and HMRC to remind me to apply for settled status. I already have this status as I applied with my maiden name which is used on my passport. I have called the EU settlement scheme to ask if my married name can be added. I was only confirmed I have settled status under my maiden name and **if I want my married name to be used I need to change my name on my passport** which I can't do. I'm worried about entitlement after 30th June and called DWP carer allowance to check the information about me. They can see on their system that I started using the married name 8 years ago but apparently, they can't see I have a settled status. **I received a lecture about not changing my name on my passport.** I see this as a huge discrimination issue should I and other women in the same position lose their entitlements." – May 2021*

112. A common concern is around loss of access to benefits, where HMRC and DWP know an individual by one name whereas the Home Office knows that same individual by a different name. While EU Free Movement regulations were still in force this was not a problem for EU citizens, since no immigration status was required, and an EU passport was sufficient. However, since the UK has left the EU, an immigration status issued by the Home Office is a prerequisite for recognition of lawful residence in the UK and therefore for (continued) eligibility for benefits.

113. This was highlighted during the series of letters sent by the Home Office and DWP/HMRC in 2021 to people who they believed had not yet applied for EUSS status but were in receipt of benefits.

*"I am a French National married to a UK citizen. France issue passports that record a spouse family name alongside the person's maiden name. The spouse's name is not included in the passport's Machine Readable Zone, which means it is not automatically recorded and the passport does not indicate which name the applicant is using for all official purposes. As a result, I have been granted settled status under my maiden name. I have had settled status since September 2019. I have just received a letter from HM Government addressed to my married name urging me to apply for EU Settlement Status before the end of this month or I will not be eligible to benefits, access free healthcare etc.... I am now retired having worked in the UK for 40 years, paid tax ..... I have tried to contact different services to no avail. Can you please advise to what I can do. I am sure I am not the only one in this situation. This is a very stressful situation, wondering what will happen after 30th June as the different UK services do not seem to be aware of this situation." – June 2021*

*"In August 2021 I received the letter that others are reporting, claiming I do not have settled status. In fact, I gained this in Feb 2019, plus I have an unlimited residence permit dated Jan 2021. However, both these are in my Dutch name, which is the name in my passport. The letter today is in my married name. I feel extreme anger and anxiety. I have lived here nearly 40 years, have worked continuously, and now I'm threatened with loss of healthcare etc." – August 2021*

**114. One respondent summarised the widespread concern about gender discrimination resulting from this issue, and described attempts to raise this issue with the UK Parliament:**

*"How do I get my married name displayed next to my maiden name on my status?"*

*My French biometric passport displays my married name after my maiden name only on the printed pages and not in the microchip. As a result, my settled status application is made in a name I have not used for over 20 years and there is no reference to my married name, which I use for all official purposes. In addition, I suspect the discrepancy between names resulted in the digital check failing to find enough evidence of my residency, despite providing my NI number with over 20 years of continuous records under my married name.*

*I am concerned about the catastrophic consequences that this disparity will have in the future, when I attempt to prove my rights and entitlements (when looking for work, housing and accessing other vital services) with a settled status document assigned to my maiden name and not to the married name I use.*

*I have heard of many other women facing the same problem, not just French, but Italian, Dutch; maybe there are others. I have contacted the EUSS Resolution Centre, Settled and the French Consulate in London to highlight this problem and get help to rectify it, but to no avail so far.*

*Whatever the cause of the inability to accept my married name, the EUSS process evidently creates systemic gender injustice and the advisory staff lack of awareness and understanding is unacceptably compounding the issue. In 1986, the UK ratified the Convention on the Elimination of All Forms of Discrimination against Women. As a signatory, the UK government has "to ensure elimination of all acts of discrimination against women by persons, organizations or enterprises," and is legally bound to look at any new policy or law to ensure women's equality. In creating the system for EUSS, the Home Office failed to acknowledge that there are nuances in the way other member states record spouses' names. Is this discrimination?"*

*In November 2019, this issue was raised by Steve McCabe, MP, asking the Secretary of State for the Home Department, what steps he is taking to ensure that the "Department's technology used in the EU settlement scheme application process accurately reads female French biometric passports that place their holder's maiden name first."*

*Brandon Lewis responded that he was "aware of instances where EU citizens who were granted leave under the EU Settlement Scheme (EUSS) had their maiden names recorded on their digital status instead of their married names." He added that the Home Department was "exploring options to enable applicants granted leave under the EUSS to be able to have their married name displayed on their digital status."*

*My experience demonstrates that either those options have not been explored or that no solution has yet been found, 14 months on.*

*I and all married European women need to obtain a record of our married name next to our maiden name on our residency status. Without it, we face discrimination and potential loss of our rights.*

*We need a solution to:*

*- include women's married name along their maiden name on their EUSS,*

*- ensure consistency with official documents*

*- enable the digital check to carry out a search for the same person who had records in more than one name." – January 2021*

115. The "EU Settlement Scheme: policy equality statement"<sup>27</sup> which was published in November 2020 following a significant delay and only after pressure from Parliament, states that the Home Office has considered this impact and believes disadvantages are mitigated, and that the approach is proportionate. See paragraph 339 (our emphasis):

*"339. The protected characteristic of marriage and civil partnership has been considered at all relevant stages of EUSS policy development and implementation: impacts have been assessed in sections 3b(i) and (ii) above. We have considered, in particular, **impacts in relation to name changes** that may be associated with this status, including in relation to the automated checks of UK residence. We have also considered that married women (and women generally) are less likely to be employed outside the home, and therefore may have more difficulty providing evidence of their UK residence. As set out there, we believe **the flexibility of the arrangements in place mitigates any potential disadvantage, and that the approach taken is justified as a proportionate means of achieving a legitimate aim** in respect of each issue examined." – EUSS PES, published November 2020*

116. It is clear from the above extract that the PES is only considering the process of achieving status in the first place and is not concerned with the use or proof of that status to access rights.

117. Paragraph 380 of the PES, answering the question "What kind of impact will the policy have on families going through key transitions such as becoming parents, getting married, fostering or adopting, bereavement, redundancy, new caring relationships or the onset of a long-term health problem?" similarly does not acknowledge any the impact of using and proving status, and thereby accessing rights:

*"380. The impact, if any, will not be significant. The EUSS will replace, with leave granted under UK immigration law, the basis under EU law on which EEA citizens and their family members can reside in the UK. Those who do not make an application to the EUSS by the deadline of 30 June 2021 where there are reasonable grounds for this will be given a further opportunity to apply."*

### [Campaign to change the process to include other surnames](#)

118. the3million has raised this issue from April 2018, when the first draft of the Withdrawal Agreement had been negotiated, and it was clear that the UK was intending to require all EU citizens to apply for a new UK immigration status. From the very first version of a document of questions to the Home Office<sup>28</sup>, we asked in question 1.21:

*"What provisions will be made for applicants whose names do not match the name on their passport?  
Some examples:*

<sup>27</sup> <https://www.gov.uk/government/publications/eu-settlement-scheme-policy-equality-statement>

<sup>28</sup> [https://bit.ly/t3m\\_HOQuestions\\_1\\_0](https://bit.ly/t3m_HOQuestions_1_0)

- married women must have their maiden name in their passport, with optional "spouse of ..." (e.g. Netherlands)
- it is customary for married women to use a hyphenated "married surname-maiden surname" in everyday life (e.g. Netherlands)
- citizens may have a formal name in their passport, but use a different given name all their lives – including on all UK documentation (e.g. Netherlands)
- the order of first names and middle names on the passport may not match the name in use in everyday life (e.g. Sweden)" – the3million, April 2018

119. Despite repeated requests, and Home Office commitments, for these questions to be answered, the3million never received a set of answers. In a meeting in April 2019, Home Office representatives insisted the vast majority of our questions had already been answered by way of various guidance and other documents.

120. A parliamentary question from October 2019<sup>29</sup> was answered by then Minister Brandon Lewis for the Home Office saying the Home Office were exploring options to deal with the issue:

*"I am aware of instances where EU citizens who were granted leave under the EU Settlement Scheme (EUSS) had their maiden names recorded on their digital status instead of their married names. Some EU countries, including France, issue passports that record a spouse's family name alongside the person's maiden name. The spouse's name is not included in the passport's Machine-Readable Zone, which means it is not automatically recorded and the passport does not indicate which name the applicant is using for all official purposes.*

*Home Office policy on names requires individuals to use one name for all official purposes. This is to prevent identity-enabled criminality, such as fraud, terrorism and sexual offences.*

*We are currently exploring options to enable applicants granted leave under the EUSS to be able to have their married name displayed on their digital status." – Brandon Lewis Home Office, PQ November 2019*

121. Many individuals have raised this issue with their MPs. This led to various exchanges between MPs and the Home Office. Angela Crawley MP raised this issue in a Westminster debate on the EUSS on 16 June 2021<sup>30</sup>. Angela Crawley said:

*"The Minister will be aware of the correspondence on behalf of my constituent Jenny Condie. According to her settled status documentation, she is called by her maiden name, Serraf. This is the case for many married European women whose passports list both their married and their maiden names. I understand that it is due to the Home Office taking details from the machine-readable zone of the passport. However, it may raise suspicions when the status documentation does not match any other form of identification. When I asked the Home Office how many women were issued with documentation in their maiden name, the information was not available. I am concerned that women will discover that their documentation is misleading only when they face awkward questions, delays or discrimination when trying to prove their status.*

*Initially, Jenny was advised by the Home Office to approach the French authorities to have her passport amended, so I am grateful to the Minister for his letter outlining that a process for changing maiden names to married names has been created at the Home Office since I first contacted him about this case. However, Jenny has been unable to have the change carried out. The Home Office requires her to send her physical passport, but she is reluctant to do so, because she is worried that she may need to travel to France if there is an emergency. Should the document get lost in the post, she would need to travel to London for a passport replacement. Those concerns will be replicated for most EU nationals in the same position. When making the application, Jenny only had to send a picture of the document. Will the*

<sup>29</sup> <https://questions-statements.parliament.uk/written-questions/detail/2019-10-30/7635>

<sup>30</sup> <https://hansard.parliament.uk/Commons/2021-06-16/debates/E1391D96-990A-44F7-85CC-A914C5EA42B5/EuropeanUnionSettlementScheme>

*Minister review the process and either make the change to married names automatic or streamline the process by accepting photographed documents?" – Angela Crawley MP, Westminster Debate, June 2021*

122. This directly implied that a process **had** been created by the Home Office to allow people to change their birth name to their married names, but that Angela Crawley MP was merely requesting a better process, one that does not involve sending an identity document through the post. However, the Minister's reply appeared to revert to the original position that only names found in the machine-readable-zone were able to be shown on the EUSS status when viewed through 'View and Prove':

*"On looking at the issue of names in passports, I take on board the point that sometimes people discover what is in the machine-readable zone of their national passport when they apply for a status with the Home Office. That is not something that affects only the EUSS; it also affects wider immigration statuses. Members will appreciate why we put quite a lot of store into making sure we have secure identity and that we link people clearly to the identity status that they use to apply to the scheme. I appreciate that can produce some issues in countries where it is less easy to convert a passport so that it shows a married name rather than a maiden name than under the system we have here in the UK, but it is an important part of how our system operates that we have that security." – Kevin Foster MP, Westminster debate, June 2021*

123. Indeed, in August 2021 we were shown a letter from an MP to a constituent relaying a response from Home Office which confirmed this position, and appears to consider the issue instead a responsibility of the French authorities:

*"I would like to thank [X] for her suggestion regarding married and maiden names. Please assure her that we will take her feedback into consideration.*

*However, at this time, our position remains that status under the EUSS is issued in line with the name recorded in the machine-readable zone (MRZ) of an applicant's passport, in order to maintain secure identity and ensure continuity between an individual's status and their immigration document. As mentioned in our previous response, [X] can continue to evidence her rights in the UK by using her passport in conjunction with her digital status under the EUSS and does not need to worry about losing access to her rights.*

*I appreciate that the French authorities are not willing to amend [X]'s passport to reflect her married name in its MRZ. However, I am unable to comment further on how the French authorities record an individual's name in their passport as the documentation of their citizens is not within our remit." – Home Office to MP, August 2021*

124. In June 2021, when we were able to have a meeting with the Home Office View & Prove team where we discussed the3million's proposal for an alternative implementation of digital status<sup>31</sup>, we raised the extra surname issue in detail, explaining the problem and suggesting possible solutions. The team said they would get back to us, but they have not done so.
125. After the letters sent by Home Office / HMRC / DWP between May and October 2021 to benefit recipients believed not to have EUSS status, the3million wrote to the Home Office voicing our concerns regarding the details of this mailshot process. Our letters specifically included our concern that the surname issue may have resulted in many letters having been sent to those who already had status, but in a different name.<sup>32</sup> We restated the problem, including the various Home Office responses to date, and requested a meeting:

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<sup>31</sup> <https://www.the3million.org.uk/fixing-the-digital-status>

<sup>32</sup> [https://www.the3million.org.uk/files/ugd/cd54e3\\_17edc4427d6f48539c16540dd7fcf38b.pdf](https://www.the3million.org.uk/files/ugd/cd54e3_17edc4427d6f48539c16540dd7fcf38b.pdf)

*“Will you agree to set up a meeting to discuss in detail the issues facing those whose name in everyday use does not match their EUSS name, and agree to look at our simple proposal to allow additional names to be shown on EUSS documentation alongside the name as found in the MRZ of the identity document?” – the3million letter to Home Office, 23 August 2021*

126. We received a reply from the Home Office on 14 October 2021<sup>33</sup>, with the following answer to the question above:

*“EUSS status is issued in line with the name recorded in the machine-readable zone (MRZ) of the applicant’s passport provided at the time of application.*

*The Home Office has recently built in a process which, after EUSS status has been issued, allows applicants to request their name be changed on their status to exactly match the name which is recorded in the Visual Inspection Zone (VIZ) of their passport instead. We are aware that for many French and Dutch married nationals, this will take the form of “Birth Name Wife of Married Name”. This would enable applicants to have their married name displayed on their status whilst maintaining a link between the two names for security purposes.*

*Example: French passport VIZ shows Name: JANET SMITH ep. [spouse of] JONES. MRZ shows SMITH only. The applicant will be issued status under the name SMITH. However, if applicant wishes to update their name to their married name, they can request to have their name updated to JANET SMITH ep. JONES.*

*Where the personal details held by government departments differ, we have been unable to match the records held, and so some people in these circumstances will have received a letter both in May and August.*

*In these instances, the person is advised to contact the Home Office so that our records can be updated to reflect their circumstances and ensure that no action is taken on their benefit payments.*

*Following meetings between your organisation and our data teams, we have adapted the digital status process to allow people to change the name shown, as set out in the response above. Therefore, a further meeting is not required as the change being requested has already been implemented.” – Home Office correspondence, 14 October 2021*

127. We have now seen an example of someone managing to have their married name included on their UKVI immigration account. We are not satisfied with the current process, as explained in the next section.

#### [Analysis of current available process to include other surnames](#)

128. The appendices to this report show screenshots of the entire immigration account update process. There is no update option which explicitly deals with the request to have additional names added to the UKVI account that were already on the identity document seen by the Home Office during the EUSS application process.
129. Following our receipt of the Home Office letter in October 2021, we asked a number of affected people to try to have their name updated. They reported finding this confusing, because adding the married name (already displayed in the VIZ section of the identity document) is neither an update of identity document, nor a change of name.

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<sup>33</sup> <https://www.the3million.org.uk/library> - October 2021, “Reply from Home Office to our letters of 6 August, 18 August and 23 August about termination of benefits”

130. The only option appears to be to follow the change of name route, however this involved sending in the identity document to the Home Office by post. Understandably, most of the people we contacted were not happy to do this, particularly as in most cases the identity document was one that had already been seen and accepted by the Home Office during the EUSS application process. In fact, this is also the issue that Angela Crawley MP specifically raised in the Westminster Hall debate as described in paragraph 121.
131. However, we followed the case of someone who was trying to update their immigration status with a renewed French passport, where there had been no change of name – both old and new passports said “[BIRTH NAME] ep. [MARRIED NAME]” in the VIZ section, and “[BIRTH NAME]” in the MRZ section. However, when she selected that she wanted to update her identity document in the screen shown in paragraph 251, she spotted that there was also an option to change name. Since she had been unhappy since first receiving status that her married name was not shown on her immigration status, she decided to tick that option also.
132. She was not aware that there even was an online identity document update process (when no other details had changed), therefore was reluctantly resigned to the need to post the identity document. She initially reported to us to complain about her anxiety over having her passport returned to her.

*“I got settled status in February 2021, got a new passport in November 2021, and sent my new passport as requested for my status to be updated. Home Office in Liverpool received my passport in early December 2021, I heard nothing so phoned the 'resolution centre' a week later. The next day I received an email thanking me for submitting my documents and saying they had been returned that day [x December]. Today is another week later, I still have not received my passport so I phoned again, was told by the (borderline rude) agent that the return was processed [x December], and sent a day later with a tracking number. Royal Mail tracking recognises the number but says they have no info. Resolution centre agent says 'not our problem'. The whole settled status thing is destroying me. I am tired of being treated with suspicion. I am without my passport because of the requirement to post it out to Liverpool.”*  
– December 2021

133. Only when we had our in-depth Report-It interview with this person and to work out why she had to send in her passport by post, did we discover that she had ticked a change of name at the same time as renewing her passport. This was not a genuine change of name, but a wish to have her married name displayed on her immigration status in the same way as it is displayed on her passport.
134. She explained that the process provided no option whatsoever to explain what she was requesting, and in particular the cover sheet which has to be included with the passport did not allow for any explanation. She therefore explained to us how she had included a covering letter:

*“The system generates a cover sheet, which has very little on it. Essentially it allows you to put a different address if you want it sent to a different address, but that's it, you can't explain anything. So I had sent a covering letter as well. I said with my new passport, what I'm asking you to do is update my passport number, and this is not actually a name change. I haven't changed name but because I've had problems fairly recently to do with the name on the settled status, then I want the settled status to show both names as per the passport. So I think they count this as a change of name which it's not really. They should have had the two names right in the first place, I think.”* – December 2021

135. The Home Office emailed the status holder 8 days after the update request, and asked her how she would like her name to be updated (we have redacted the names in the below):

*“It has been noted that you have requested for your name to be updated. As per current Home Office policy your name must match the machine-readable zone (visible along the bottom edge of the biographic page of your document) or match how your name reads within the biographic information.*

*Therefore, we can update your name to [FIRST NAME] [MIDDLE NAME] [BIRTH NAME] ep [MARRIED NAME] or it can remain as [FIRST NAME] [MIDDLE NAME] [BIRTH NAME].*

*Please respond to this email if you would like your name to be updated to [FIRST NAME] [MIDDLE NAME] [BIRTH NAME] ep [MARRIED NAME]. If you do not respond to this email within 7 days, your name will remain as [FIRST NAME] [MIDDLE NAME] [BIRTH NAME].” – Home Office email, December 2021*

136. It is not clear whether, if someone did not provide such a covering letter, the Home Office would have reached out to the person to ask confirmation of name change details. It is problematic that the process to address this urgent issue is not advertised, and even if someone is aware and is attempting to effect this change, it is not obvious how to do so.
137. In this case, the status holder replied straight away that she wanted the Home Office to update her name to “[First name] [Middle name] [BIRTH NAME] ep [MARRIED NAME]” – note the fully capitalised surnames and mixed case given names, which is how they are displayed on her passport.
138. We kept in touch with the status holder, for while she received her passport back (a week later than promised), she was for a long time not able to log in with her new passport or see the name change. She checked every day, and over a month later she could see that her UKVI account had been updated. She could log in with her new passport, and the status now displayed “[FIRST NAME] [MIDDLE NAME] [BIRTH NAME] EP [MARRIED NAME]”.
139. The fact that it is all displayed as one string, all upper case (even the word ‘ep’) is not helpful, as it is not obvious which parts are given names and which parts are surnames, and not everyone will know what EP means. For example, imagine someone with two given names Lindsay Cameron, a birth name of Smith and a married name of Jones. Identity documents would clearly disambiguate these in some ways. For example, a French passport might typically display this on two lines as:

*Nom/surname*  
**SMITH ép JONES**  
*Prénoms/given names*  
**Lindsay, Cameron**

Whereas a Dutch passport might typically show three lines as:

*Name/surname/nom*  
**Smith**  
*echtgenote van/wife of/épouse de* Jones  
*Voornamen/given names/prénoms*  
**Lindsay Cameron**

Whereas the View & Prove would show this name as one line:

**LINDSAY CAMERON SMITH EP JONES**



## Chapter 5. Updating contact details

### Potential confusion between contact and sign-in details

141. In earlier versions of the immigration account update process, people could update their contact details (email address, telephone number and postal address) and any changes to email address and telephone numbers would take effect in the sign-in process. However, this has now been split into two separate functions, without a clear explanation in the View & Prove Guidance document<sup>34</sup>. The guidance mainly talks about sign-in details, then says (our emphasis) **“You can also use the ‘update details’ service to tell us about a change to your address or contact details (if these are different to your sign in details).”**
142. There is no extra information given about the purpose of each set of details during the online process (see Appendix D and Appendix F). We consider that there is scope for confusion, with people updating the wrong set of details. People could change their contact details and not be able to sign in, or they could change their sign in details and stop receiving important emails or text messages from the Home Office. We are not clear why there are two sets of email/telephone details, especially since it is possible to add a helper to the account (see *“Adding helpers to the account”* in Chapter 7).

### Problems updating telephone number

143. We have had reports of problems when updating to a non-UK telephone number, because the required security code does not arrive. (See paragraph 257 for screenshot).

*“I am trying to change my phone number, but the text message to confirm the change never arrives. I've tried multiple times over multiple days, no luck. Starting to wonder if it actually works for non-UK phone numbers? I am concerned I will lose access to my settled status information.” – October 2021*

### No option to update to non-UK address

144. We have also had several reports about trying to change home address to anything outside the UK. As can be seen in the screenshots in paragraphs 262 to 265, it is not actually possible to properly enter an address outside the UK, as the process is driven off a UK postcode search.

*“I have settled status and have recently moved back to Spain. I want to update my contact details on my settled status, such as my new Spanish address & contact mobile number.*

*When I log in into my settled status account/records, it says you must update any personal details if they've changed. It says to update home address, but once I click on update details, it takes me to another page which says “update UK address”. So I cannot update my current and correct home address. I'm concerned this could cause problems travelling to UK as a visitor and maybe moving back in some years, as my personal details haven't been updated correctly, which could therefore affect my settled status.” – September 2021*

145. We have also received some reports where people were unable to update their address, and were faced with an error message:

*“I simply cannot update my UK address using the online, digital service. I have settled status, obtained over a year ago, and recently did two things, renewed my passport and changed my address. I was able*

<sup>34</sup> <https://www.gov.uk/government/publications/view-and-prove-your-immigration-status-evisa>

*to update my passport without any issues but when I try to update my address to the new one, I simply get an error telling me that they cannot update my address. If the home office tries to contact me on my old address, mail will be lost since I no longer live there and have no way to update my information. This is especially worrying because we don't have any sort of physical id here in the UK and everything is address based, so if my address is incorrect, I could get into trouble..." – January 2021*

## No ability to see existing contact details

145a. The system does not show the existing contact telephone number, contact email address, or postal address anywhere, it only gives an option to enter a new contact telephone number, contact email address or postal address. This means that people can't check what contact details the Home Office currently holds on them, and they can't check whether a request to update these details has taken effect. Although people get a confirmation email, this email only states *"You have updated your contact address. We will use this address to send you letters and other documents"* and does not state the address itself. This not a satisfactory replacement for being able to check directly on the online account what the currently held address is.

*"I have changed my postal address details on gov.uk and I received a confirmation email. I would like to confirm that I do not need to provide for any proof of address.*

*The reason I am asking is because I've had issues with uploading evidence before during my application and I want to make sure there's a UK address on my profile before I reach the end of 2 years since I was granted status. I have tried to call the settlement scheme helpline but couldn't get through." – April 2022*

145b. In contrast, the system does show people their current sign-in details, when they go to update those – see paragraph 279. Given that we assume the contact telephone number can be different to the sign-in telephone numbers, and that we have highlighted the scope for confusion between the two, it is even more important that people can view their existing contact details. It is not clear whether existing helper details would be shown if a helper contact was set up.

145c. The inability to view existing contact details creates similar insecurities to those discussed in the section *"Unable to see full list of identity documents attached to status"* in Chapter 3. A recent respondent explained that they managed to get through the confusing process of using 'update' to 'add' an identity document, experienced the lack of any acknowledgement, and went on to say:

*"In the end - over 7 weeks later - I got an email from the Home Office informing me that the identity document had been updated. So I tried to log into my status to check it - but I couldn't! Because the login updates to the latest submitted document (only this isn't obvious or even explained).*

*Once I found out what to do, I realized that I can't actually check on my status which identity document(s) are linked to me.*

*This process could be much more transparent, more user-friendly and quicker. The impact of this problem is massive - I have no idea (and no means of checking) if my passport is still linked to my status or if the passport has been replaced with my ID card. This made me extremely anxious when I had to travel to [...] before Christmas to see my dying grandmother."- April 2022*

## Chapter 6. Updating photo

### Timeline of functionality becoming available

146. Since the EUSS opened to the general public in March 2019, there have been reports of people unhappy with their photograph showing when viewing their status online. Many did not realise that the photograph they used when applying for status would be the photograph that was shown whenever they or others viewed or proved their status.
147. In July 2019, it was reported in the media<sup>35</sup> that it was now possible for people to change their photograph that was used, via 'Update my Details' service. However, this change did not appear to be added to the 'Update my details' page at that time.
148. In July 2021, we asked the View & Prove team about this functionality via the email address we had recently been provided. In September 2021 we received the reply that *“Work is underway to enable users to update their image via the ‘Update details’ service. This functionality should be available later this year.”*
149. The functionality finally appeared late September 2021, and the process is documented in *“Appendix E. Screenshots: Updating photo”*.
150. Although the3million have not, to date, received direct reports from people having problems with this update process, we have heard comments from some organisations, for example POMOC, that some people see the option to update their photos, and others do not.
151. For example, we have heard that those who made paper applications are not able to change their photograph.

### Photos missing from View & Prove profiles

152. We have received multiple reports of people who are unable to generate a share code, but who also mentioned as part of their report that their photograph was missing when they log in to view their immigration status.
153. Although this is not strictly related to the process of updating one’s immigration status, we include it in this report as it does appear to indicate a problem with the status changing over time.
154. It is clear from the report below that at least for some, the photo was there before and has since disappeared:

*“When I now check my status online and while all information is correct it won't display my picture, and says 'photo not available'. I contacted the EUSS Resolution Centre, and they said they would look into it. It's been a week and is still not fixed. It's clearly some IT glitch, because my photo used to be in my EUSS page---I couldn't have been granted EUSS without it! In lockdown I'm not really travelling anywhere but had I not randomly checked my status last week I would have probably only noticed when exiting or re-entering the country, which is far from ideal, and may have caused delays if not problems at the border. We'd be better off if we could also have a card or other physical proof of our EUSS. As I said I was just doing a routine check so I'm lucky I caught this at the time when I didn't have an immediate need to prove my EUSS. But it did make me feel vulnerable (also it's still not solved). It also made me think that if*

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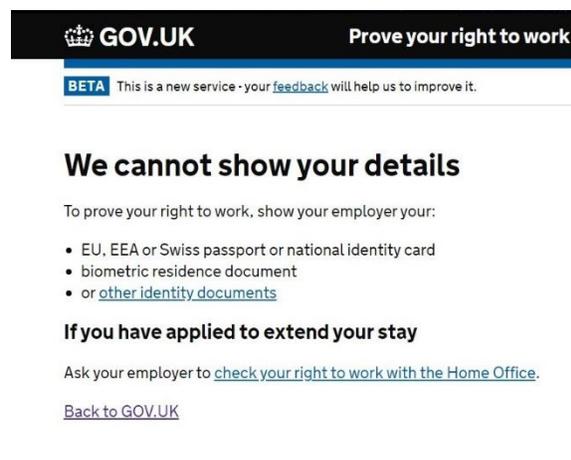
<sup>35</sup> <https://europastreet.news/settled-status-headache-updating-details-after-passport-renewals/>

*a glitch causes your photo to disappear, could it also cause other details to be lost? Also, it's taking a while to get sorted.” – February 2021*

155. We frequently hear that there appears to be a correlation between the photograph being missing and the inability to generate a share code. This clearly has significant impact on people, as in this respondent whose mortgage application is being delayed as a result:

*“In applying for a mortgage, I was requested a share code to prove my Settled Status. When trying to generate a share code, I am able to login to the View&Prove Gov.UK website, and I see that I do have settled status. However, my photo is not displayed, and when I click the button to generate a share code, I come to a Gov.UK webpage saying "There's a problem with this service at the moment. Try again later". This has been the case for a month now, and I have been trying almost daily. I have phoned the EU Settlement Resolution Centre several times, managed to get through twice, and reported this as a technical issue for which they filled out a form and said they'd get back to me. They have not gotten back to me in almost two weeks now, and the mortgage lender keeps insisting on a Share Code to progress my application.” – April 2021*

156. One of the respondents who reported this inability to generate a share code alongside a missing picture included the following screenshots. The second screen is generated when they press ‘Prove your status’ from the first screen. This had an impact on proving their right to work.



157. As another example of the impact of this problem, this respondent told us they had difficulty at the border and proving their right to rent. This does not appear to be a temporary IT glitch, as this problem has been reported by different people over several months.

*“The online service displays a message "We cannot show your details, please ask the landlord to [use/view] other documents". The same applies trying to prove right to work, or just getting a share code. There is no picture displayed: I suspect there was a technical issue, and the photo got corrupted, (shown as NOT AVAILABLE), preventing the verification system to display all details. I faced extensive questioning at the border and had issues proving my right to rent.” – August 2021*

158. Another respondent who attached screenshots showing a lack of photograph, and the error code “We cannot show your details” when pressing “Prove your status”, had obtained pre-settled status as part of the initial EUSS trials in 2018. The report includes concerning attempts to have the problem resolved through the EUSRC and raises the question that there may be many others with this issue, all of which will need to be individually fixed.

*"I obtained pre-settled status in 2018, as part of the pilot group. I have realized some time ago that I am able to see my status on the website of the Home Office, but not to get the share code that should be in principle used to prove right to work and to rent to third parties (<https://www.gov.uk/view-prove-immigration-status>). I have attached both the screenshot of my status and the error message that I get while trying to generate the share code.*

*After failed attempts to solve the issue through my employer, I have had to call the EU settlement scheme centre (03001237379). I got three times an automated message telling me that the lines are too busy and disconnecting the call. At the fourth attempt, after waiting almost half an hour, I have been finally able to speak with an agent. Basically, what I have been told is that it is a bug in the online system. I updated my passport when it expired one year ago and, more recently, my personal email. In both cases, I followed the correct procedure, but somehow this has been recorded in some bits of the systems but not in others. I have been told that I will get an email confirming that my details have been corrected. I told to the operator that this problem might have potentially affected many other people, and that the Home Office should check it, but basically the response is that it is their problem – the people affected have to call to rectify it. I have been recently asked by an estate agency to generate a share code for proving my right to rent an apartment, and I have been unable so far. I hope that the estate agent accepts alternative evidence, or that the Home Office corrects the error soon. I have also wasted a lot of time trying to solve the problem." – July 2021*

## Chapter 7. Updating sign-in details

159. As mentioned in paragraphs 141 - 142 in “*Chapter 5. Updating contact details*”, there is potential for confusion between contact details and sign-in details, and the significance of each.
160. The same problems described in paragraph 143 about some non-UK telephone numbers not receiving the required security code apply here also.

### Locked out of signing in

161. Access to the *current* sign-in email address or telephone number is essential, because a security confirmation code is sent to one of these and entered to log in to View & Prove, or to the immigration account update process.
162. There will be many people, including vulnerable or digitally excluded people without continuity of access to a telephone or email address, who may be caught out by this and find themselves in a catch-22 situation where they are unable to change to a new email address and phone number without having access to the old email address or phone number.
163. This is also highly likely to happen to people, again often vulnerable or digitally excluded, who had help obtaining status in the first place, using someone else’s sign-in details.

*“Our adviser was supporting DS, a Polish national with settled status, with his housing and welfare issues. When our adviser attempted to log into his account to generate proof of his settled status, it emerged that the email address linked to the account was the private email of a person who had helped DS apply for settled status and that DS no longer had access to the mobile number linked to the account. DS was eventually able to recover his account but only after weeks of delay.” – PILC, February 2022*

164. This will typically happen in cases where some time has passed between the original application and the moment where status needs to be proved. Although the EUSRC or the UKVI RC may be able to help reset these details, this will necessarily take some time in order to verify the individual’s identity. Furthermore, as we have consistently reported, it is not always possible to easily reach either of the Resolution Centres.
165. Many people will only try to view or update their immigration status at the point at which it is urgent. An example of this is shown by the respondent who was suddenly asked to prove his status before a PhD application deadline:

*“E-mail address was from the university, but has since changed. The phone number is German and the security code is apparently not sent there. Ergo, I can't prove my status at the moment. And I can't get through the only way to contact the Resolution Centre (by phone). Tomorrow my deadline for the university to prove that I am allowed to study expires. I'm concerned my university will probably kick me out of my PhD course.” – May 2021*

166. It is not uncommon for people to update their telephone number, or email address, but not realise that they need to update their immigration account. By the time they realise, at the point of needing to view their status, both may have changed and therefore they find themselves in this situation where they cannot successfully log in to make the change.

*“I needed to update my email address and phone number associated with my Settled Status as both changed. However, in order to update this information, a security code sent by SMS to my registered phone number or by email to my registered email address has to be sent to verify the identity. So in this*

*case I am stuck in limbo, needing the phone number or email address I no longer have to update my phone number and email address needed in order to view my status.” – June 2021*

## Adding helpers to the account

167. It is now possible to add a ‘helper’ to the immigration account, as documented in the screenshots in paragraphs 282 to 284.
168. On the webpage which starts the UKVI update process (<https://www.gov.uk/update-uk-visas-immigration-account-details/update-your-ukvi-account>) it says “*You cannot use this service to update a UKVI account if you’re registered in the account as a ‘helper’. Only the person who applied can make changes.*”
169. Although we cannot find details about what a helper can do, we have heard accounts of a helper speaking to the EUSRC on behalf of the status holder. We understand that in that case, the purpose of the helper’s email address and phone number was needed for security checks, achieved by the helper having to receive a security code when speaking to a Home Office staff member on behalf of the status holder.
170. It is not clear whether a helper is able to log in to View & Prove, and generate share codes, with their email address and telephone number as sign-in details.
171. It would be helpful to add more details about the purpose of a ‘helper’ and what they are able to do, both in the View & Prove guidance, and on the update process itself.

## Chapter 8. Change of immigration status

### Introduction

172. In previous chapters we have analysed issues related to individuals updating their own immigration account online. However, the successful maintenance of immigration status also depends on changes in status being reflected accurately by the Home Office.
173. When someone applies for status under the EUSS, they are not given a unique person identifier. Instead, they are provided with a unique application number (UAN). This has the potential to cause problems when people make repeat applications, for example through an incomplete application being previously abandoned, a new application after a refusal, or an application for settled status after having been granted pre-settled status.
174. See paragraphs 35 to 41 for a detailed discussion of the implications of this design decision.

### Pre-settled to settled status

175. We have received a number of reports where people with pre-settled status could no longer see this status via View & Prove once they submitted a follow up application for settled status. Instead, they were shown an application in progress, giving only temporary rights for six months. This severely affects issues such as mortgage applications.

*“My fiancé and I would like to buy a house, but only at the mortgage application it turned out that my pre-settled status which I applied for and was granted years ago has been overwritten with my recent settled status application (applied for in April and not approved since), so I cannot prove that I have pre-settled status. The loan application has been put on hold because of that, and the vendor of the house is impatiently waiting for things to proceed. I called the Home Office and after an hour of waiting on hold I was able to speak to an advisor, here is the summary of the conversation: 1. My pre-settled status is legally valid, applying for settled status did not legally stripped me from the pre-settled status. 2. He cannot make it visible on the website, so neither myself or anybody else I need to prove my status for can look up my pre-settled status in the future. 3. He said he sees no obstacles not to grant my settled status. 4. He cannot tell even approximately how much more time do they need to approve my settled status (again, I applied for it in this April), so it has been on for a while, and it does not seem to be reasonable to sit on it for too long, especially if that is the only way out of this predicament. While I am writing this I am contacting the Home Office again in hopes I get an advisor for the second time, who actually can do something for me to be able to prove my pre-settled status again.” – July 2021*

176. Even though the Home Office has frequently stated that people have the right to work when they have a certificate of application, in practice employers often appear to discriminate against such candidates during recruitment.

*“I have been struggling to get through over the phone or get sensible answers why my application to change from PSS to SS is taking 3 months AND why my PSS that initially valid till 2024 has disappeared and only shows 6 months of right to work? I cannot secure the job as not able to demonstrate more than 6 months right to work.” – July 2021*

177. For many, the inability to view or prove their rightful immigration status affected their mental health.

*“ I’m getting in touch in relation to EUSS application delays. It took home office one whole year to grant me a pre-settled status and the same is happening this time. I have applied to upgrade to a settled status in May this year and I have been waiting ever since. The online portal doesn't even display my pre-*

*settled status anymore and is highly confusing. I have emailed resolution center several times without any positive response so far. This is frustrating and has affected my mental health significantly. I feel completely let down by the Home Office. I don't feel comfortable to leave the country to go on holiday or for a family emergency. I am having trouble to convince recruiters about this new Confirmation of Application status for getting permanent jobs as it doesn't show that I already have a pre-settled status.” – July 2021*

178. In one case we received, an update of identity document *after* a successful upgrade from pre-settled to settled status resulted in the status holder only being able to see their *pre*-settled status when logging in with their new identity document. They could no longer log in with their old identity document. Proof of their settled status had therefore been lost.

*“I received confirmation of my settled status via email but it's not updated online from pre-settled to settled status. I believe this should be changed because I have now been issued the settled status letter.*

*I applied using the BRC for both pre-settled and settled status applications. I contacted HO yesterday and they mentioned there seem to be an issue when I was updating my old passport details with a new one. But I am not too sure what the issue is. Initially, I could log on to the view status online portal with my BRC but not anymore, now I have to use my passport. I have a new job and need to prove my status. I have already mentioned I have settled status but cannot prove that because it's the pre-settled status showing online. The HO has mentioned to me they will get back to me next week, but am not too sure about that, especially after making 35 calls to them and successfully getting to them once.” – June 2021*

179. This particular issue of showing the incorrect status is not an isolated incident, as the following report shows:

*“In July 2021 I updated my passport number linked to my settled status. On 21st October when I tried to view my status it was showing pre-settled instead of settled. I have tried using my old ID and it was showing settled status. After a call to Home Office I found out that the system updated the new document somehow on the pre-settled status. My wife has the same issue. We are now waiting for the home office to solve the error. I can't trust that this system is working.” – October 2021*

180. Our correspondence with the Home Office, discussed in paragraph 37, raised the question of whether the lack of unique person identifier is a cause of the problems described above where a pending application overwrites an existing pre-settled status. Their reply said that the problem had been fixed without the need for a unique person identifier and suggested this fix had been applied on 15<sup>th</sup> July 2021. We have however received anecdotal evidence from other organisations that this issue still occurred for at least some applications submitted after July 2021.

## Administrative reviews and appeals following refusals

181. We have heard of various cases where people had either submitted an administrative review or appeal following a refusal. During such a review or appeal, people should still have their rights – as clearly stated in Article 18(3) of the Withdrawal Agreement (our emphases): “...and pending a final judgment handed down in case of judicial redress sought against any rejection of such application by the competent administrative authorities, all rights provided for in this Part shall be deemed to apply to the applicant...”.

182. In paragraphs 63 and 65 of our second IMA report of August 2021<sup>36</sup>, we gave some examples of refusals followed by new applications still showing the refusal when logging in via View & Prove. The latter case was for someone who had actually already been granted status on their second application.
183. The letter from the Home Office<sup>37</sup> about identification of individuals across multiple EUSS applications says that this should only occur where the second application was made using a different identity document. For those situations, the letter agrees that this problem is caused by not linking identities across applications, and says that manual fixes need to be employed to address these situations:

*“A person may still see a refusal in the View & Prove service if they submitted the second application using a different identity document and log into View & Prove using their previous document. If this is the case, it is caused by the lack of linking of identities, but the UAN is not directly related to this.*

*Having the UAN helps the caseworker to spot the two applications should be linked (although this is already possible without it), but a UAN in itself will not allow the two applications to link automatically.*

*Anyone in this position can contact the UKVI Resolution Centre, who can arrange to manually update their eVisa or address the fact there are duplicate accounts.” – Home Office letter to the3million, December 2021*

184. However, we received the following report from an organisation supporting migrants, where both applications were made using the same identity document, and yet the refusal rather than the CoA was shown when logging into View & Prove. This report also shows that this has concrete consequences.

*“One of my clients was refused in Dec 2020, new application made in April 2021, COA received the same day but when logging in still showing refusal. He logged on yesterday and sent me a screenshot, and it’s definitely showing refusal. I’ve seen COA as well. Both applications were made using the same document (passport).*

*He had problems at the border when returning back from Poland in August because the border control could only see the refusal but not a new application/COA.” – September 2021*

185. The same letter from the Home Office acknowledges that the lack of linking applications means that HMRC and DWP may not be able to recognise an upgrade from pre-settled to settled status in future. The letter makes clear that enquiries with the person are needed to prevent termination or refusal of benefits.

*“Before HMRC and/or DWP take any action on a person’s claim they make enquiries with the person and give them the opportunity to demonstrate they are eligible to be in receipt of them (this includes, but is not limited to, using the View & Prove platform for the person to share their status). There are also processes in place whereby HMRC and DWP can contact the Home Office and confirm a person’s status where appropriate.” – Home Office letter to the3million, December 2021*

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<sup>36</sup> <https://www.the3million.org.uk/ima-report-aug-21>

<sup>37</sup> <https://www.the3million.org.uk/library> - December 2021

## Multiple applications

186. There are many cases where multiple applications have been submitted, especially when it comes to vulnerable applicants who received help from different people. This can have severe consequences for people struggling to prove their entitlement to benefits and housing. A case study from PILC gives an example, which shows that even two months after attempting to withdraw the incorrect application, the error still persists.

*"In September 2021 our adviser was contacted by a local authority about a client, CT, living in temporary accommodation. CT needed proof of status to continue in receipt of both temporary accommodation and benefits but did not know how to access this proof. When our adviser tried to help CT generate a share code, her online status showed as 'Certificate of Application' (rather than 'Settled Status'). Upon investigation, it emerged that a support organisation had submitted two EUSS applications on her behalf. One of these had been granted, but the other was still listed as outstanding, and this had overridden her status as shown on the online system. CT was advised to withdraw the outstanding application, which we assisted her to do. However, two months later, the application is still listed on the system as 'outstanding'" – Public Interest Law Centre, February 2022*

187. One respondent misunderstood the immigration account update process, and inadvertently started a new application because they thought they should use the 'EU Exit: ID Document Check' app to scan a renewed passport. This created a new (incomplete) application, linked to the new passport. Thereafter they could not update their existing status with the new passport. Even subsequently withdrawing the new application did not fix the problem, because the new passport was still somehow "known" to the system.

*"I was granted settled status in May 2019, and in August 2019 I got a new passport. In December 2020, I realised that I need to update passport information for my EU Settlement Scheme status. I logged in, but I didn't find the place where to update this information. I remembered that when I was applying, I had to put the phone on top of the passport for the app to read RFID Chip.*

*I opened an app on my phone, but the only option was to start from scratch. I assumed that the app will recognise the name, surname, DOB and NI number and will tell me "Here you can update your data". Instead, it allowed through, creating a new application.*

*The following month a friend showed me where I can update the passport in my profile. I tried to do it, but it showed that the new passport number was already used (in the new application). I contacted EU Settlement Resolution Centre by phone. I was told to withdraw the new application. I did that and I received a confirmation that that new application was withdrawn.*

*I logged in back to my old account with the old passport, clicked update document, and it tells me that I cannot do it because the new passport is already in the system. Tried to contact them on email, but they do not give assistance in this way. Tried to call, but only heard recorded notification that the centre is closed now (at 1pm on Thursday)." – January 2021*

188. Similar to the problems with 'upgrading' from pre-settled to settled status (by submitting in a new EUSS application), we have also heard that applications with other immigration route switches are very problematic in which immigration status is displayed through View and Prove. Again, this equates to an effective loss of status if a person has no way of proving their status. As Agnete Gribkowski of Gribkowski Migration reported to us, it appears that Section 3 C Immigration Act 1971 has not been taken into consideration in the design of the digital status:

*"We have three clients whose digital status does not reflect their actual immigration status:*

1. A pre-settled status holder who has applied for settled status. Instead of stating that he has pre-settled status (which will be the case until his variation application has been finally determined unless his PSS were to be curtailed) his digital status now only states "certificate of application" and then lists the entitlements which he would have if all he had were an outstanding EUSS application.
2. A non-EU national holder of Tier 1 (Exceptional Talent) leave to remain valid until 2024 who last year had submitted her own EUSS application as a durable partner which was refused. She did not pursue an administrative review or appeal and the deadlines for lodging these expired. Her status clearly reverted to Tier 1 leave, yet her digital status only shows that she has had an EUSS refusal. Each time she re-enters the UK she is interrogated about this, despite showing her BRP, causing significant stress and delays. From 6 April 2022 her problems in proving her status will clearly be exacerbated by the fact her BRP will be ignored altogether.
3. An EU national who entered the UK in 2021 as a Skilled Worker. This was issued as digital-only status. She has applied for EUSS status under Surinder Singh. Her digital status now states only that she has a certificate of application, again only setting out the entitlements that go with that. Any reference to Skilled Worker permission has disappeared. For this reason, she has been refused a mortgage, which affects not only her family but the property chain. The mortgage policy by her bank specifies that what is required to prove eligibility is either an "unexpired BRP" or a share code for settled or pre-settled status. It is clear to see from this example the importance of urgently informing all stakeholders, including banks, of the digital-only status policy which is about to be implemented on 6 April 2022 in relation to forms of leave outside the EUSS.

*It is clear from all these examples that s3C Immigration Act 1971 has not been taken into consideration in the design of digital status, and what information appears when a share code is provided. S3C provides that the previous form of leave continues if an in-time variation application is submitted, until the variation application has been finally determined. While it may, perhaps, be helpful to also have a reference to the certificate of application having been issued, the primary purpose of digital status, surely, has to be to provide information which accurately reflects the actual immigration status under immigration law. The only cohort whose digital status should show "certificate of application" in isolation are those with no other form of leave." - Gribkowski Migration, March 2022*

189. The second of the cases described above is particularly serious. Someone with leave to remain until 2024 sees the following when they log in to View & Prove using their biometric residence permit:



190. As the case above explains, this person is interrogated about her status by a UK Border Force officer each time they enter the UK, despite showing her BRP. She thought it might help to link her passport to her refused EUSS status, in the hope that her BRP would be ‘unlinked’ from it. After all, as described in “*Confusion around the ability to add new identity documents*” in Chapter 3, the language used on the website suggests that the status will be updated to refer to the identity new document, rather than having multiple documents attached. However, this is not the case and therefore would not help. It appears from her experiences that UK Border Force officers look at a person’s BRP and check whether there is any digital status attached to it - in her case showing an EUSS refusal rather than the existing, still valid, leave to remain status as distinct from the EUSS.
191. We asked this person to try to use the ‘Prove your right to work to an employer’ website<sup>38</sup>, and select the ‘I have a biometric residence card or permit’ option. Doing so did then display her right to work under her leave to remain status outside the EUSS. We presume that the ‘Prove your right to rent in England’ website<sup>39</sup> would yield similar results. However, it is clear that UK Border Force, banks or other institutions will not be looking at a right-to-work or right-to-rent website.
192. The View & Prove Guidance<sup>40</sup> makes the specific point that reform of the immigration system will increasingly include automatic accessing of status:

*“As part of our wider reform of the immigration system, we are increasingly enabling some Government departments and public authorities to be able to automatically access immigration status information. Currently, this includes the Department for Work and Pensions (DWP), HM Revenue and Customs (HMRC) and NHS England and Wales. The Borders, immigration and citizenship privacy notice provides information about how we share data with other Government departments.*

*Where this is the case, you do not need to share your status to be able to access these services. Organisations will confirm your identity and then be able to access the information directly.” – View & Prove Guidance as at March 2022*

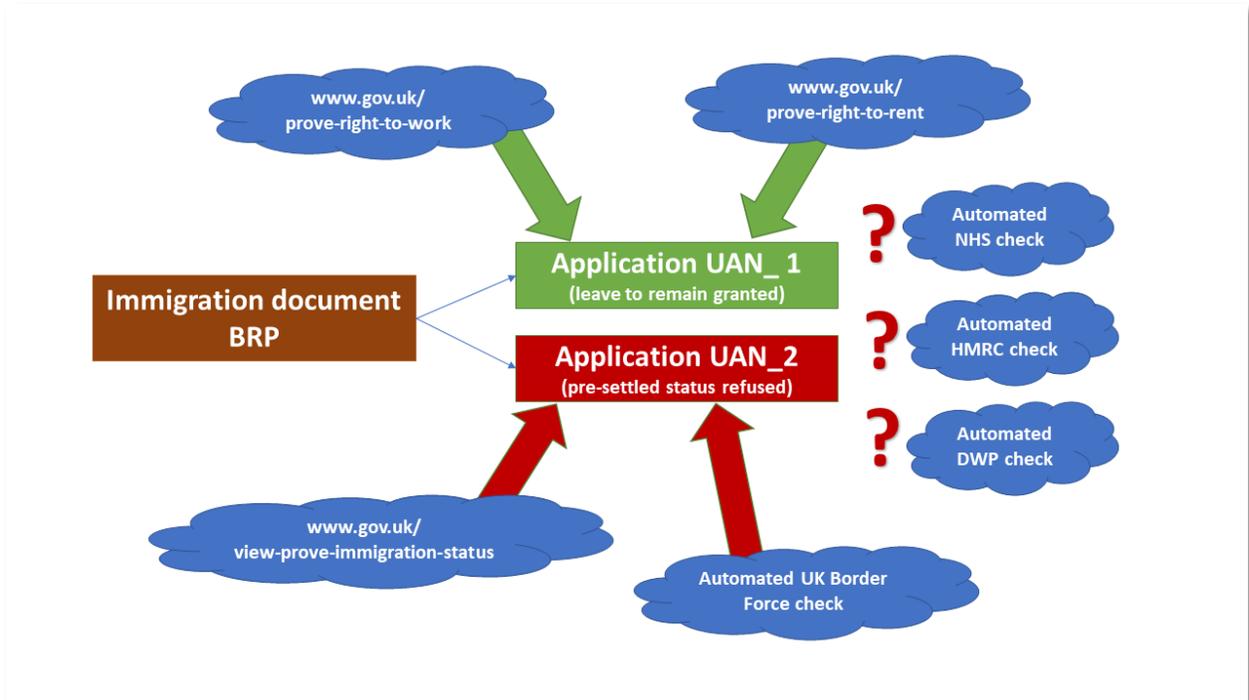
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<sup>38</sup> <https://www.gov.uk/prove-right-to-work>

<sup>39</sup> <https://www.gov.uk/prove-right-to-rent>

<sup>40</sup> <https://www.gov.uk/government/publications/view-and-prove-your-immigration-status-evisa>

193. In addition to the problems described in ‘Access to immigration account through a changing identity document number’ in Chapter 3, there is therefore also a problem related to the method used to access the status, as described by the following diagram:



194. It is of serious concern that we are already seeing examples of how such ‘automated’ checks can return the incorrect status about a person. This is revealing a further, fundamental problem for the digital status infrastructure. There is no single record of a person’s status, and the results shown depend on the relevant identity document, the selected website URL and the underlying Home Office database that is accessed.

## Chapter 9. IT glitches

195. We receive regular reports of problems which are not necessarily related to a particular part of the immigration status maintenance process, or to a particular individual’s data input, but which nevertheless appear to be related to a change to the status somewhere along the way. We will list some of these in this chapter.

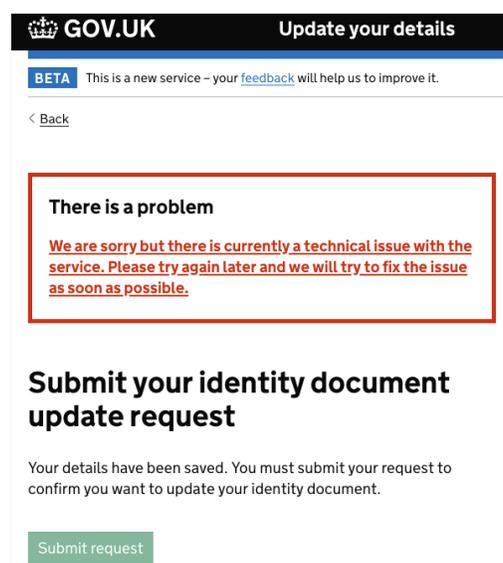
196. One person told us that they have not been able to display their status at all since attempting an update.

*“I updated my new passport details a year ago and I am still unable to view my status online as there appears to be a glitch in the system meaning the system recognises my new passport details when I login but then they have a problem displaying my status and I am unable to request a code to verify my status. I have reported this to the Home Office and every Monday I get an SMS saying they’re sorry I am not able to view my status and they are looking into it. I have changed jobs due to redundancy and now my new employer is not able to verify my right to work, I have been in this country for 12 years.” – March 2021*

197. Another person, with settled status, was not shown an option to update her identity document. Given that the website says it is not possible to update identity documents on pending applications, it appears plausible her application was incorrectly marked as pending.

*“My mum has settled status. On the Gov website it says we need to change the details of the IDs used when we renew them but when we try to do this it does not give us the option to do so, only phone, email or address. She is in Portugal at the moment but has renewed her passport. She is suffering anxiety prior to travel as last time even with settled status and documents they were quite hostile.” – August 2021*

198. We have had reports of the update service failing when people press ‘Submit request’ after having gone through the update process. We have had reports of this same error at many points in time. Given that the percentage of EUSS status holders who report to the3million is relatively low, this appears to indicate that this error happens fairly regularly.



199. This invariably happens at a point where people are wanting to travel with a new identity document (often after long Covid-related delays in renewing identity documents), and therefore causes a lot of stress.

*"At the end after I clicked on submit I got the message "We are sorry but there is a current technical issue with the service. Please try again later and we will try to fix the issue as soon as possible. If we had physical proof, it could be an ID of its own, you may not have to change it when you renew your passport." – March 2021*

*"I tried to update my passport details but it gave me the error message [screenshot above]. I am due to go to [EU country] for a specialist medical appointment and I am worried I won't be able to use my new passport to get back into the UK." – June 2021*

*"Today, after a long and tedious process to update my UKVI account with my new passport, I got an error message [screenshot above]. This is very stressful because I am planning to visit my family in [EU country] in January. I haven't seen my family since October 2020, and I renewed my passport recently at the [EU country] Consulate London. I am feeling powerless." – December 2021*

200. Another respondent was only informed that there had been a technical error via email several days later. We had sight of the email, which gave no indication of any potential causes of the problem: *"Thank you for your request to update your profile with your new document details. Unfortunately, we have been unable to process your request due to a technical issue. Please resubmit the request, ensuring all your details are entered correctly. We apologise for any inconvenience caused."* The respondent wrote:

*"Despite a valid submission on the UKVI website to update her passport details, some days later my wife received an email citing technical problems for non-processing and requesting resubmission. With a few days left until we travel back to the UK, this has left her in fear of border officials rejecting her entry and separation from our children (UK Nationals). Most likely the resubmission will not be processed on time, and there is no clarity on whether expired documents will still be accepted." – July 2021*

201. In other cases, people receive errors not only when trying to update their status but also when trying to view their status. This respondent also mentions that they feel the tightly coupled link between status and identity document is problematic, calling for a physical document to remove this link. If the digital status were implemented differently, for example as a digital token belonging to the status holder similar to the vaccination certificate, this tight linking can also be removed.

*"My settled status is attached to my national ID card, but I wanted to attach it to my passport as the ID card will no longer be valid for travel. When I tried to log in, I kept getting an error page. I tried on two different computers and two different browsers.*

*I also couldn't view my settled status. It did pop up once, but I got the error page again when I tried to update my documents and then I couldn't get back in again.*

*I telephoned the number provided on the page and he took all my details to pass on to technical help, but I was unable to update my documents. I have not yet heard back from technical help (24 hrs). Luckily, I have no plans to travel just yet due to Covid. However, if I were doing this just before travelling then it would be a major concern, particularly if my ID document was expired or lost. If I had a physical document, I could just show it alongside my nationality document and I wouldn't need to update it when my nationality document is changed." – December 2021*

202. As described in other parts of this document, it is often the lack of transparency and trackability of the process that causes the most anxiety. A confirmation message plus an error message leaves the status holder very confused about whether the update has worked, and the fact that the EUSRC is unable to know whether the update has been submitted is very problematic.

*“My girlfriend updated her passport in the system. All seemed to go well, the new picture was uploaded, but after a confirmation message on screen, the website displayed a generic error message as well. A few days later she called the SS resolution centre and they said that there is no way for them to know whether the update request has been submitted. They also cannot tell how long it will take for it to be processed if it was, although the official ETA is one week. Therefore all they could advise was to wait but it’s unclear for how long, and what she should do if the update does not go through. In the meantime she had to use her old passport number to prove her status to her employer, which they accepted this time, however could prove to be a problem in the future.” – March 2021*

203. Even when the update itself appears to proceed without errors, anxiety is caused by subsequent errors when trying to view the status, in combination with delays and lack of transparency about how long these delays might be:

*“I submitted my new passport details exactly 2 weeks ago via the required link having settled status. A message popped up saying my new passport details will be checked. No other email confirmation confirming my request to update. My old passport expired in May, so I now regularly check my status to see if my new passport has been added. No luck so far and today the website is down again. I dread leaving the UK to visit my mother as I might not be able to prove my settled status upon re-entering the UK.” – June 2021*



204. Another person told us that after an update, they faced a series of different errors, including one claiming they were a ‘helper’ on the account.

*“I got a new passport in October and tried to update my status. The update felt strange, I was expecting a confirmation message at the end but did not get one. I checked yesterday – I could log in with my old passport on the system but not with my new passport. I tried to do the update again and on submitting got a ‘Technical problem, try later’ error. Hit refresh and it said I can't make updates as I'm "a helper, the person who owns the passport needs to do the update"???? I have never seen a menu asking me whether I was doing this for myself or for someone else, so it was a very strange and untrue error message. I tried again a few days later and got some error messages about the system being down. I tried half a dozen times, getting random error messages and eventually it got updated, after 8 months” – June 2021*

## Chapter 10. Recommendations to the Home Office

### Review design of EUSS View & Prove

205. Develop an impact assessment of the decision to access View & Prove through a key which changes over time (the latest identity document to be attached to the person's immigration account), rather than through a key which is unique and unchanging for each person.
206. Provide an impact assessment of the decision to remove biometric residence cards, biometric residence permits, and frontier worker permits from the list of valid documents for right to work and right to rent checks from 6 April 2022.
207. Produce a Data Protection Impact Assessment on View and Prove and associated information use across UK Government departments. Confirm whether there was evidence of design and testing consideration given to automated immigration checks for people who may have had multiple applications for (potentially different) immigration status with the Home Office, to ensure that such automated checks always display the correct and most-up-to-date immigration status for such people.
208. Accelerate engagement with an alternative implementation of digital immigration status, an example of which is the3million's proposal (<https://www.the3million.org.uk/fixing-the-digital-status>). At a minimum, such a status must be in the form of a digital token that belongs to the user rather than a web interface process granting transactional permission from the Home Office for each situation in which the person needs to prove their status. The token should not be strongly coupled with an identity document, as this generates unnecessary synchronising problems. Finally, the implementation must provide for a physical representation of the status, with a validity comparable to identity documents.
209. Ensure that stakeholders representing citizens who have to use the system are involved in changes and proposed changes to the View & Prove and immigration account update process. The Home Office should change its development process from a tightly controlled, closed process to one which allows stakeholders to put forward suggested changes, and test changes before they are rolled out to the general public.

### Address technical errors in the View & Prove and update system

210. Check all digital status accounts to identify those where photographs are missing, and ensure these accounts are all corrected and able to generate share codes. As this appears to be a systemic problem, this should be corrected systematically by the Home Office rather than relying on each individual to seek help through the EUSRC.
211. Ensure that every individual always sees, and shares, a status that properly reflects their legal rights when using the View & Prove process. For example, a granted settled status should not show the person having pre-settled status, a pre-settled status with a pending application for settled status must show the person has pre-settled status rights, and a refused application undergoing administrative review or appeal must show the person has a pending application. Previously incomplete or withdrawn applications must not interfere with showing someone's correct legal status.

212. It is essential to monitor all reported errors of inability to access immigration status, to analyse the reasons for these and create fixes in a transparent way. Regular reports should be published, showing which 'bugs' had been identified and fixed on which date – in the same way that any software product would issue release notes. It is not acceptable that the system changes from time to time without any transparency or public trackability.

### Create a trackable process around immigration account updates

213. Create a clear, trackable, and reportable process around updating the UKVI account. Create published service standards around returning identity documents, ensuring fully secure and tracked postal services are used. Create published service standards for completing the account update. Ensure that when people contact the Home Office, it is possible to give accurate progress information about their update.
214. Reduce the length of time taken to update a person's immigration status with a renewed identity document. People have the right to travel with a renewed identity document as soon as they have it, and many people will not have access to their expired identity document. The process should take no more than a few days to enable travel rights on their new document soon after update.

### Remove need to send identity documents through the post

215. Improve the identity document update process to allow online updates for all cases where a person has not changed their name, even if there is a difference in the Machine Readable Zone of the passport due to a passport specification change.
216. Create a published roadmap towards ensuring that no-one needs to send an identity document by post. Given that initial applications can be done using the 'EU Exit: ID Document Check' app, subsequent maintenance of a person's immigration account for changed names or nationalities should not require passports to be sent to the Home Office.

### Review process for adding additional surnames to EUSS status

217. Perform a thorough review of the process to add additional names (as shown on identity document) to the EUSS status as seen on View & Prove and involve a panel of affected stakeholders from multiple nationalities in this to ensure an improved process.
218. In the meantime, at a minimum urgently update the process to:
- clearly advertise the ability to add additional surnames
  - allow people to do so without having to send in their identity document by post
  - display the resulting names in a more readable form to allow differentiation of first names, surnames and relevant linking word ('wife of' / 'usage' / 'épouse' etc) rather than displaying all as one long string in upper case.

## Make improvements to the update process

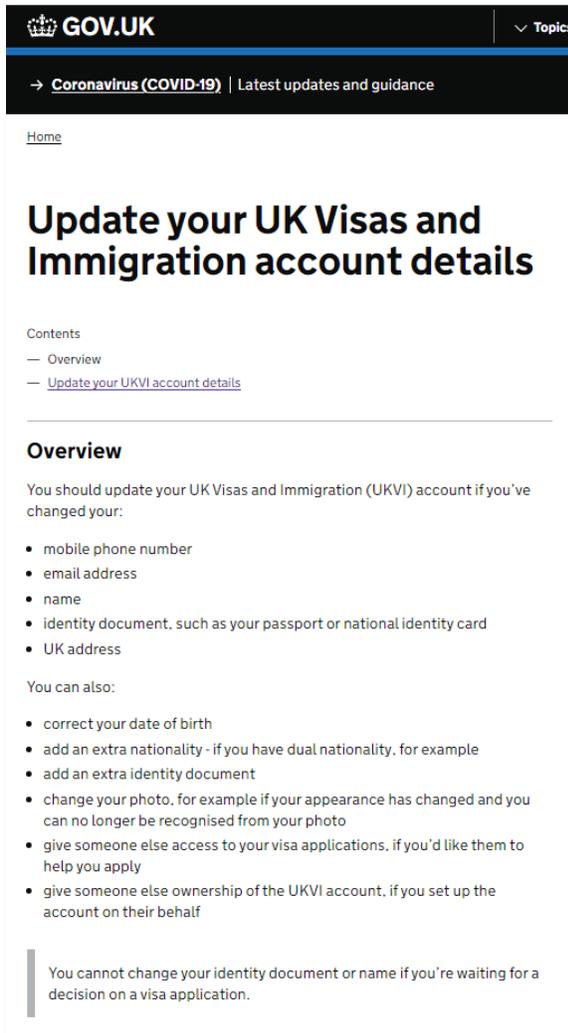
219. Urgently improve the update process around identity documents to make it easier for people to add, view and manage multiple identity documents. The current process does not make it clear that people can **add** an identity document as opposed to **updating** their identity document, and people are not able to check which of their identity documents are attached to their account. In the absence of a redesign of the entire log in process, people should also be able to log in with **any** of their attached identity documents rather than having to remember which one they happened to attach to their account last.
220. Wherever a photograph needs to be uploaded, include the requirements for format(s), dimensions and minimum / maximum file size requirements of the photograph on the page giving all other photograph requirements.
221. Accept other popular image formats other than only JPG/JPEG, such as PNG, GIF, or TIF/TIFF.
222. Investigate why some telephone numbers do not receive security codes by SMS, especially whether this affects non-UK telephone numbers.
223. Change the titles and functionality of the process to update postal address so that it is not restricted to a UK address.
224. Ensure all holders of digital status can update their photograph, regardless of whether they applied by paper application form or via the app/online, or any other differences.
225. Differentiate between “contact details” and “sign-in details” and explain the significance in both the update process and View & Prove guidance.
226. Provide more details – both in the update process and in the View & Prove guidance – on the significance of adding a ‘helper’ to the immigration account, and what the helper is able to do.
- 226a. Display existing contact details so that people can be confident of current details held on file for them by the Home Office.

## Improve resourcing of the EUSRC and UKVI RC

227. As recommended in earlier reports to the IMA, improve resourcing, reviewing, and monitoring of the EUSRC and the UKVI RC and ensure continued, sufficient funding for grant funded organisations. Such reviews and evaluation should be made available publicly. All these will still be needed in the long term, not only to deal with ongoing applications for joining family members and pre-settled to settled status upgrades, but also to help people maintain their immigration account and access their rights through proving their immigration status.
228. Create a public page with frequently encountered issues with View & Prove and the immigration account update process. As an example, such a page could include instructions on how Spanish ID cards should not use the DNI number to log in, but show the different number to be used instead.

## Appendix A. Screenshots: Update process – logging in

229. The UKVI immigration account update process starts here: <https://www.gov.uk/update-uk-visas-immigration-account-details>. If people are viewing their EUSS status, there is a link on their status page to update their status, and that also takes them to this same webpage.
230. The following Appendixes show what immigration account information can be changed (screenshots correct as at 11 February 2022).



The screenshot shows the GOV.UK website interface. At the top, there is a black navigation bar with the GOV.UK logo on the left and a 'Topics' dropdown menu on the right. Below this is a dark blue banner with the text '→ Coronavirus (COVID-19) | Latest updates and guidance'. The main content area has a white background and features a 'Home' link at the top left. The main heading is 'Update your UK Visas and Immigration account details'. Below the heading is a 'Contents' section with two links: 'Overview' and 'Update your UKVI account details'. The 'Overview' section is expanded, showing a list of items that should be updated: mobile phone number, email address, name, identity document (such as passport or national identity card), and UK address. Below this is a section titled 'You can also:' followed by a list of actions: correct your date of birth, add an extra nationality (if you have dual nationality), add an extra identity document, change your photo (if your appearance has changed), give someone else access to your visa applications, and give someone else ownership of the UKVI account. A final note states: 'You cannot change your identity document or name if you're waiting for a decision on a visa application.'

231. There is some further information about updates, and then the person is taken to the next page (<https://www.gov.uk/update-uk-visas-immigration-account-details/update-your-ukvi-account>) to initiate the update process:

## Update your UK Visas and Immigration account details

Contents

- [Overview](#)
- Update your UKVI account details

---

### Update your UKVI account details

To sign in and update your UK Visas and Immigration (UKVI) account, you'll need:

- your identity document - your passport, national identity card, or biometric residence card or permit
- access to your phone or email address - you'll get a security code to confirm your identity

To sign in, use the identity document and contact details you gave when you applied, unless you have already used this service to update them.

If you're updating your name, date of birth or nationality, you'll also need an identity document that proves the change is needed.

You cannot use this service to update a UKVI account if you're registered in the account as a 'helper'. Only the person who applied can make changes.

[Sign in >](#)

232. When the person chooses the “Sign in” button, they are taken through the standard sign-in process, where they are asked for the identity document they used in their application.

Sign in

## What identity document did you use in your application?

If you have updated your identity document since you applied, you must use the details of the updated document to sign in.

- Passport
- National identity card
- Biometric residence card or permit

[Continue](#)

233. Once the person chooses one of these, they are asked to fill in their identity document number – for example passport number as in the following screenshot:

Sign in

### What is your passport number?

Passport number  
For example, 120382978

[Continue](#)

If you do not have your passport number, contact [UK Visas and Immigration](#).

234. Next, they are asked for their date of birth:

Sign in

### What is your date of birth?

You should enter this as shown on your passport, for example, 31 3 1980

Day    Month    Year

[Continue](#)

235. Finally, they are asked how they want to receive a security code (this is called two-factor authentication, to ensure only the status holder can access this account), whether by telephone or email address:

Sign in

### How do you want to receive a security code?

We will send a code to your phone or email address.

Applicant

Phone (\*\*\*\*\*\*)

Email (\*\*\*\*\*@\*.com)

[Continue](#)

**Problems signing in**

If you no longer have access to your phone and email, [recover your account](#).

236. Once the security code is sent by text or email address, and the person has successfully filled it in on the next page, the update process can start. The first stage of the update process asks the status holder which details they want to update:

### What details do you want to update?

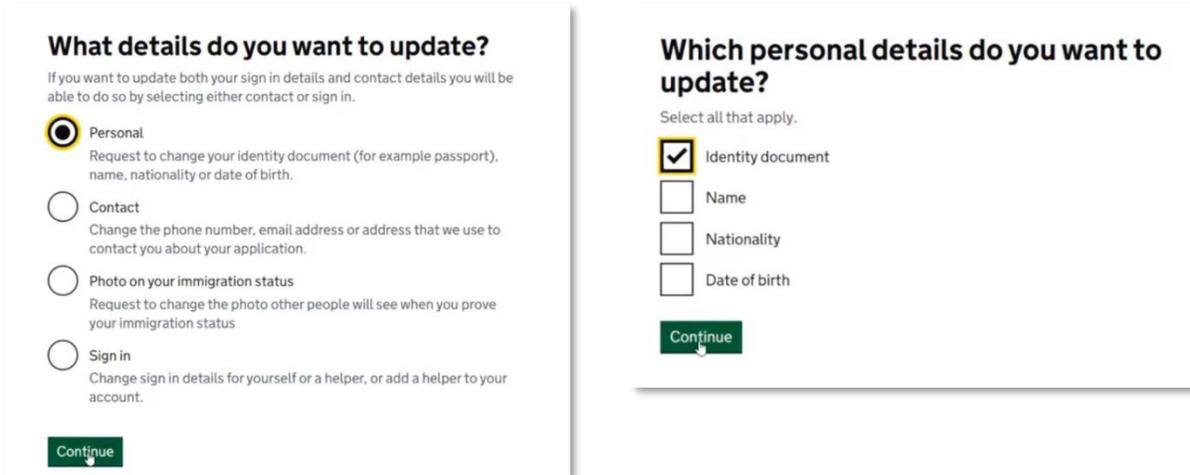
If you want to update both your sign in details and contact details you will be able to do so by selecting either contact or sign in.

- Personal**  
Request to change your identity document (for example passport), name, nationality or date of birth.
- Contact**  
Change the phone number, email address or address that we use to contact you about your application.
- Photo on your immigration status**  
Request to change the photo other people will see when you prove your immigration status
- Sign in**  
Change sign in details for yourself or a helper, or add a helper to your account.

[Continue](#)

## Appendix B. Screenshots: Updating personal details – identity document only

237. When someone chooses ‘Personal’, they are presented with the following screen:



**What details do you want to update?**  
If you want to update both your sign in details and contact details you will be able to do so by selecting either contact or sign in.

- Personal**  
Request to change your identity document (for example passport), name, nationality or date of birth.
- Contact**  
Change the phone number, email address or address that we use to contact you about your application.
- Photo on your immigration status**  
Request to change the photo other people will see when you prove your immigration status
- Sign in**  
Change sign in details for yourself or a helper, or add a helper to your account.

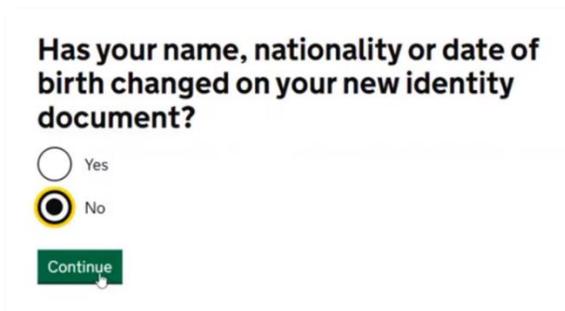
[Continue](#)

**Which personal details do you want to update?**  
Select all that apply.

- Identity document
- Name
- Nationality
- Date of birth

[Continue](#)

238. If the status holder ticks **only** identity document, and leaves Name, Nationality and Date of Birth unticked, then the following screen is displayed, to double check that there has been no change of Name, Nationality or Date of Birth. If they choose ‘Yes’, they are routed to the process described in “Appendix C. Screenshots: Updating personal details – other id document changes”.

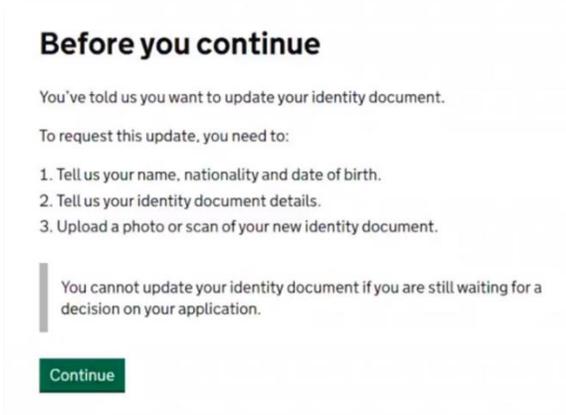


**Has your name, nationality or date of birth changed on your new identity document?**

- Yes
- No

[Continue](#)

239. If the status holder presses no, then they are taken to the next screen, which is the start of the online identity document update process:



**Before you continue**

You've told us you want to update your identity document.

To request this update, you need to:

1. Tell us your name, nationality and date of birth.
2. Tell us your identity document details.
3. Upload a photo or scan of your new identity document.

You cannot update your identity document if you are still waiting for a decision on your application.

[Continue](#)

240. After pressing continue, the next screen asks for country of nationality:

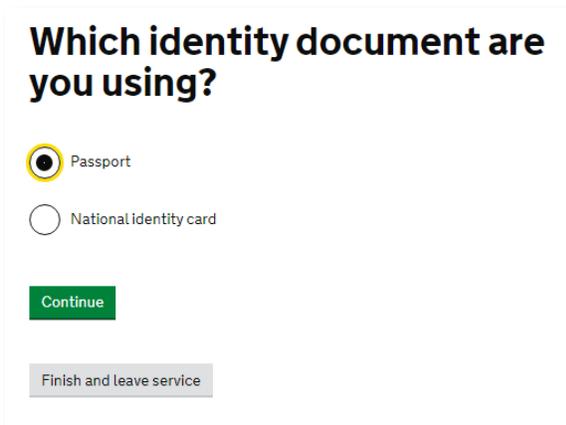


**What is your country of nationality?**

This is the country of nationality shown on your identity document. Use the English spelling if it is written in two languages.

[Continue](#)

241. Next, the status holder is asked about the type of new identity document. Depending on the choice made, the next three steps give instructions that are specific and relevant to taking photographs of each type of identity document.



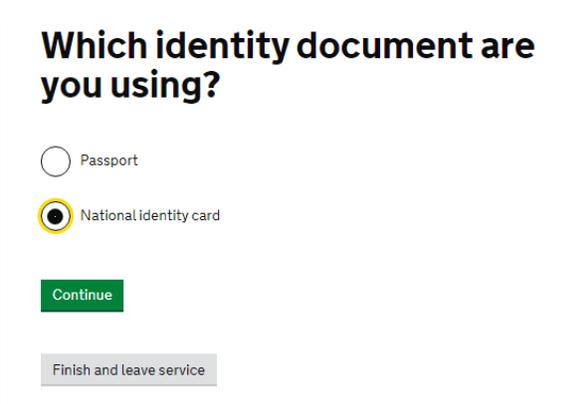
**Which identity document are you using?**

Passport

National identity card

[Continue](#)

[Finish and leave service](#)



**Which identity document are you using?**

Passport

National identity card

[Continue](#)

[Finish and leave service](#)



243. The next page allows the status holder to upload their photograph. Frustratingly, the rules about file type and size limit are not displayed on the previous instruction page, so the status holder may well have created for example a .PNG image file with inadequate proportions or size.

## Upload a photo of your passport

You will be able to check your photo meets the rules on the next page.

### Upload a photo

Choose file IMG\_0463.JPG

▼ What format should my photo be?

The photo must be:

- a jpg or jpeg file
- at least 600px by 750px
- at least 50KB and no more than 6MB

Continue

Finish and leave service

## Upload photos of your national identity card

You need to upload a photo of the front of your identity card and a separate photo of the back.

You must upload the side without the machine-readable zone (MRZ) in section 1 and the side with the MRZ in section 2.

You will be able to check your photos meet the rules on the next page.

### 1. Upload side without the MRZ

Choose file No file chosen

### 2. Upload side with the MRZ

Choose file No file chosen

▼ What format should my photos be?

The photo must be:

- a jpg or jpeg file
- at least 600px by 750px
- at least 50KB and no more than 6MB

Continue

Finish and leave service

244. The next page displays the uploaded file and allows the person to check its quality, and to upload a different photo if necessary. An automated preliminary check is done to check the photo(s).

### Check the photo of your passport

**Your identity document photo**



**Our automated checks suggest**  
the photo does not show the MRZ.

This could be because you have:

- zoomed in or cropped the photo too closely
- uploaded a photo of you and not the identity document
- taken a photo of a photocopy
- covered the MRZ

We recommend uploading a new photo as this one may be rejected.

**If you want to use this photo**

You can still use this photo if you think the results of our automated checks are not correct.

The photo you submit is your responsibility. We may reject your request if the photo does not meet our requirements.

**Do you want to use this photo?**

Yes, I want to use this photo

No, I want to upload another photo

[Continue](#)

### Check the photos of your national identity card

**Your identity document photos**

Side without the MRZ



**Our automated checks suggest**  
the photo does not show the MRZ.

This could be because you have:

- zoomed in or cropped the photo too closely
- uploaded a photo of you and not the identity document
- taken a photo of a photocopy
- uploaded a photo of the side without the MRZ twice
- uploaded a photo in the wrong section
- covered the MRZ

We recommend uploading new photos as these may be rejected.

**If you want to use these photos**

You can still use these photos if you think the results of our automated checks are not correct.

The photos you submit are your responsibility. We may reject your request if the photos do not meet our requirements.

**Do you want to submit these photos?**

Yes, I want to submit them

No, I want to upload new ones

[Continue](#)

Side with the MRZ



[Finish and leave service](#)

245. The status holder is then asked to type in their passport or identity card number, the country of issue and expiry date. A common mistake is that people enter the UK if their passport was issued by their consulate in the UK, but they need to enter their nationality's country.

## Enter your passport details

**Passport number**  
This can contain letters and numbers. For example, "120382978A".

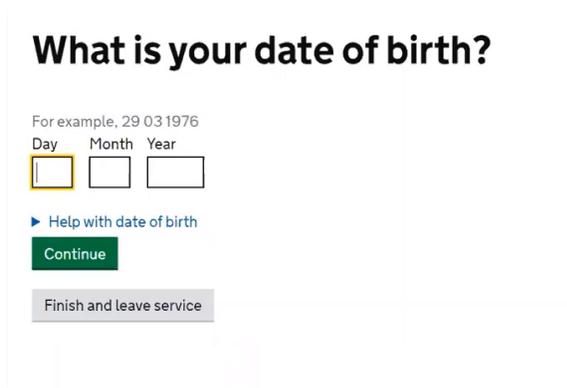
**Country of issue**  
This could also be shown as 'place of issue' or 'issuing authority'

**Does your passport have an expiry date?**

Yes  No

[Continue](#)

246. Next, they are asked for their date of birth



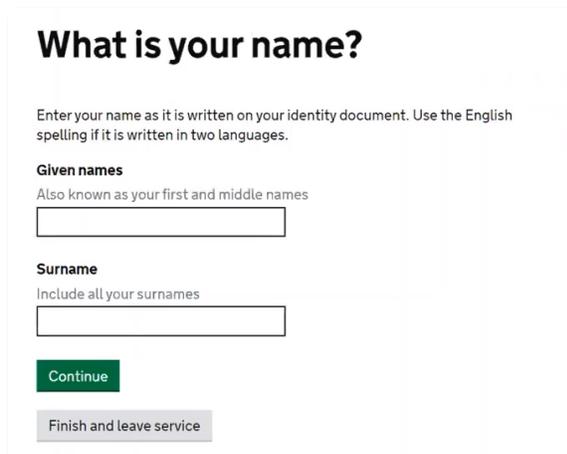
**What is your date of birth?**

For example, 29 03 1976

Day    Month    Year

[▶ Help with date of birth](#)

247. Then they are asked for their name. This could be confusing, as a person’s name as displayed in the Visual Inspection Zone (VIZ) of the identity document could be different to the name as displayed in the machine-readable-zone (MRZ) at the bottom of the identity document. For example, some countries, can display married women’s name as “birth name wife of married name” in the main part of the passport, and then only display birth name in the MRZ. It is unclear whether including the married name in the surname field (note the instruction to include **all** your surnames) might trigger the process to say there is a name change, and then refuse the online process.



**What is your name?**

Enter your name as it is written on your identity document. Use the English spelling if it is written in two languages.

**Given names**  
Also known as your first and middle names

**Surname**  
Include all your surnames

248. Next, a summary page is shown, allowing a final chance to change any of the previous steps.

### Your new document details

Document type	[REDACTED]	<a href="#">Change</a>
Document number	[REDACTED]	<a href="#">Change</a>
Country of issue	[REDACTED]	<a href="#">Change</a>
Expiry date	[REDACTED]	<a href="#">Change</a>
Name	[REDACTED]	<a href="#">Change</a>
Nationality	[REDACTED]	<a href="#">Change</a>
Date of birth	[REDACTED]	<a href="#">Change</a>
Image of document	[REDACTED].jpg	<a href="#">Change</a>

[I need to change some information](#)

You will not be able to change your answers once you accept and continue.

[Accept and continue](#)

249. Finally, the status holder is asked to Submit their request.

### Submit your identity document update request

Your details have been saved. You must submit your request to confirm you want to update your identity document.

[Submit request](#)

250. A confirmation page is shown, which gives no indication of how long it will take to actually process the update.

### Your update request has been sent

#### What happens next

We'll check the information you have given.

We'll then contact you by email to confirm your update, or to let you know if there's a problem.

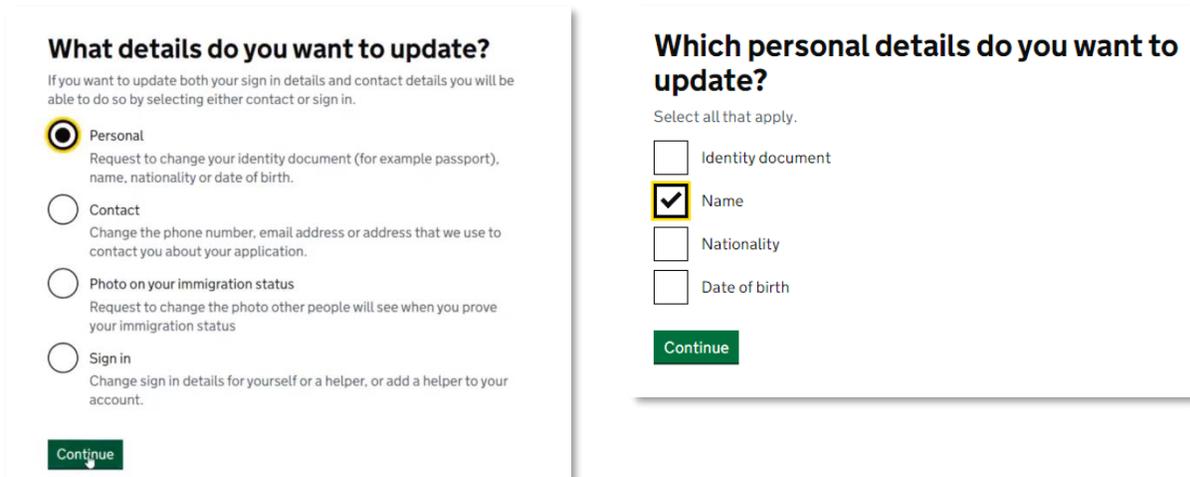
Use your old identity document details to access your online status, until your update has been confirmed.

[Update another detail](#)

[Finish and leave service](#)

## Appendix C. Screenshots: Updating personal details – other id document changes

251. If someone chooses 'Personal' but indicates that there are (also) changes in Name, Nationality of Date of Birth, they are then routed instead to a postal process.

The image shows two sequential screenshots of a web form. The first screenshot, titled 'What details do you want to update?', presents four radio button options: 'Personal' (selected), 'Contact', 'Photo on your immigration status', and 'Sign in'. The 'Personal' option is highlighted with a yellow circle. The second screenshot, titled 'Which personal details do you want to update?', shows four checkboxes: 'Identity document', 'Name' (checked), 'Nationality', and 'Date of birth'. The 'Name' checkbox is highlighted with a yellow square. Both screenshots include a green 'Continue' button at the bottom.

252. The person is shown the following screen, which displays instructions about posting identity documents to the Home Office.

## Tell us you are updating your personal details

**!** Do not make this change until you have received your status decision.

You will need to:

1. Download and print the file [Change of personal details: cover sheet and checklist \(PDF, 229KB\)](#)  
 The file includes 2 pages: a checklist for you to keep for reference and a cover sheet to send with your new identity document
2. Provide 1 identity document with your new personal details on it - it must be the original and not a copy.
3. Send us the new identity document and cover sheet by recorded delivery to:  
 PO Box 2077  
 Liverpool  
 L69 3YP

### What happens next

We will use the identity document to update our records. After you have received email confirmation of the update, you will need to use the new document to verify your identity when accessing our services.

We will return your identity document by recorded delivery as soon as we have checked and confirmed the new details. The document will be returned to the address the Home Office holds for you.

You will need to [update your address](#) if this has changed. We advise you to do this before you send us your identity document.

### Document to download

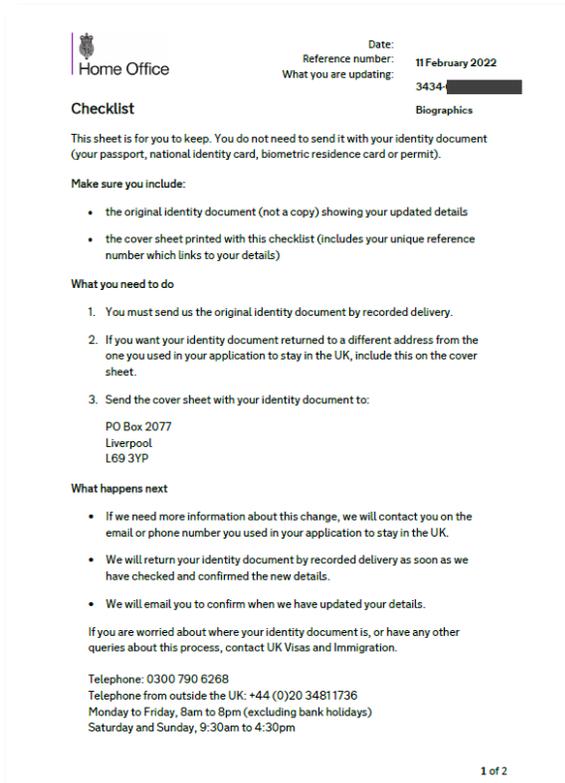


[Change of personal details: cover sheet and checklist \(PDF, 229KB\)](#)

---

Update something else

253. The instructions include a two-page downloadable PDF. The first page contains the instructions again. There is an inconsistency in that the online process states that if someone wants the document returned to a different address, they must use the contact information process before sending off their document. However, the PDF instructions say they can simply use a different address on the cover sheet.

This is a checklist document from the Home Office. It is titled 'Checklist' and 'Biographics'. It provides instructions on what to include and what to do when sending an identity document for updates. The document includes contact information for the Home Office and a reference number of 11 February 2022. The reference number for the update is 3434-XXXXXX. The document is dated 11 February 2022. The document is 1 of 2 pages.

 Home Office

Date: 11 February 2022  
Reference number: 11 February 2022  
What you are updating: 3434-XXXXXX

**Checklist** Biographics

This sheet is for you to keep. You do not need to send it with your identity document (your passport, national identity card, biometric residence card or permit).

**Make sure you include:**

- the original identity document (not a copy) showing your updated details
- the cover sheet printed with this checklist (includes your unique reference number which links to your details)

**What you need to do**

1. You must send us the original identity document by recorded delivery.
2. If you want your identity document returned to a different address from the one you used in your application to stay in the UK, include this on the cover sheet.
3. Send the cover sheet with your identity document to:  
PO Box 2077  
Liverpool  
L69 3YP

**What happens next**

- If we need more information about this change, we will contact you on the email or phone number you used in your application to stay in the UK.
- We will return your identity document by recorded delivery as soon as we have checked and confirmed the new details.
- We will email you to confirm when we have updated your details.

If you are worried about where your identity document is, or have any other queries about this process, contact UK Visas and Immigration.

Telephone: 0300 790 6268  
Telephone from outside the UK: +44 (0)20 34811736  
Monday to Friday, 8am to 8pm (excluding bank holidays)  
Saturday and Sunday, 9:30am to 4:30pm

1 of 2

254. The cover sheet only asks for the address to which the status holder's identity document should be returned. Note how the address instructions conflict with the instructions in paragraph 252.

 Home Office

Date: 11 February 2022  
Reference number: 3434  
What you are updating: Biographics

**Cover sheet**

**!** Put this cover sheet in the envelope with your identity document.

**When to provide a return address**

If you want your identity document returned to a different address from the one the Home Office currently holds for you, you must provide a return address.

**Return address**

Write your address clearly in the box.

We will only use this address once to return your document.

If you want to change your address permanently, visit the Update your UK Visas and Immigration account details service ([www.gov.uk/update-uk-visas-immigration-account-details](http://www.gov.uk/update-uk-visas-immigration-account-details)).

2 of 2

## Appendix D. Screenshots: Updating contact details

255. The section 'Contact' allows people to change their telephone numbers, email address and post address. Changing the contact telephone number, or contact email address does not change the telephone number or email address used for sending the security code while logging in. Instead, people have to change those in the separate 'Sign in' section. In earlier versions of the update system, there was no separate 'Sign in' section, so this may cause confusion.

**What details do you want to update?**

If you want to update both your sign in details and contact details you will be able to do so by selecting either contact or sign in.

Personal  
Request to change your identity document (for example passport), name, nationality or date of birth.

Contact  
Change the phone number, email address or address that we use to contact you about your application.

Photo on your immigration status  
Request to change the photo other people will see when you prove your immigration status

Sign in  
Change sign in details for yourself or a helper, or add a helper to your account.

[Continue](#)

[Sign out](#)

256. When people choose 'Contact', they are then asked which contact detail to update.

**Which contact detail do you want to update?**

Phone number

Email address

Address

[Continue](#)

257. Choosing 'Phone number' informs the status holder that a confirmation security code will be sent to the new telephone number, and the next screen asks them for the new number.

Update a contact

**Before you continue**

We will send a confirmation code to the new contact phone number. You need to have access to this phone number to get the code.

[Confirm and continue](#)

Update a contact

**What is the new phone number?**

For international numbers include the + symbol with the country code.  
For example, +39133457090.

[Continue](#)

258. Choosing 'Email' similarly informs the status holder that a confirmation security code will be sent to the new email address, and the next screen asks them for the new email address.

Update a contact

### Before you continue

We will send a confirmation code to the new contact email address. You need to have access to this email address to get the code.

[Confirm and continue](#)

Update a contact

### What is the new email address?

[Continue](#)

259. The person will be asked to enter their security confirmation code in the next screen, before the change takes effect – in the same way as during the log in process.

260. Choosing 'Address' displays a screen where the person is asked to enter a UK postcode. This is problematic for people who want to enter an address outside the UK. People with pre-settled or settled status have the right to move outside the UK for certain periods of time depending on their status, so there should be the ability to enter a non-UK contact address. the3million made the Home Office aware of this in September 2021 and were told it would be forwarded on to the relevant team for consideration. In October 2021 we contacted them again but have received no further reply.

### Which contact detail do you want to update?

Phone number

Email address

Address

[Continue](#)

Update a contact

### What is the new UK address?

This is the address where you would like to receive any letters or documents

Enter UK postcode

[Continue](#)

261. If the status holder chooses a UK postcode, and subsequently selects their address from the dropdown list provided for that postcode, they are taken to a final screen where they can check the address and submit the change.

Update a contact

### What is the new UK address?

Postcode  
 [Edit](#)

Select an address:

[I cannot find my address on the list](#)

[Continue](#)

Update a contact

### Check the address

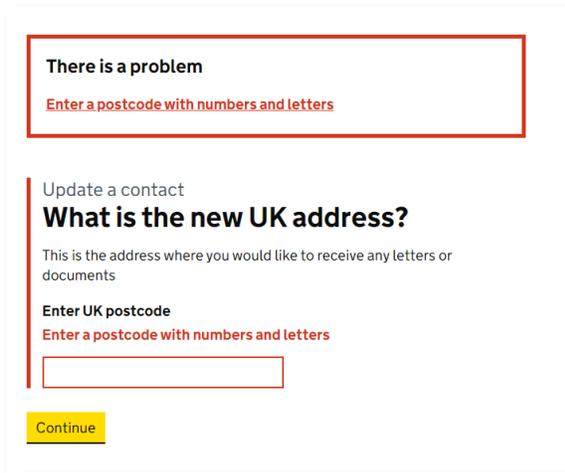
Once updated all future letters or documents will be sent to this address.

Your new address

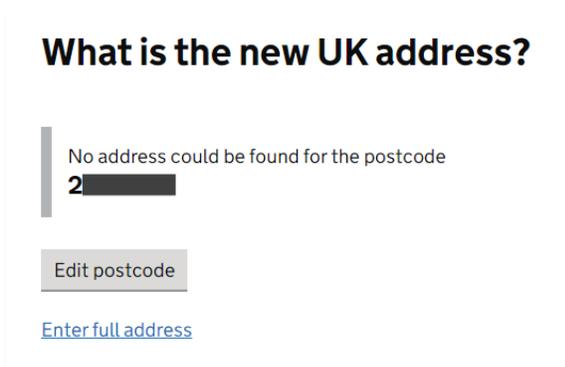
[Edit](#)

[Update address](#)

262. However, if they wish to enter a non-UK address, they are stuck. If they leave the 'UK postcode' field blank in paragraph 259, the following error screen is displayed:

A screenshot of a web form with a white background. At the top, a red-bordered box contains the text 'There is a problem' in bold, followed by 'Enter a postcode with numbers and letters' in red. Below this, the text 'Update a contact' is followed by the heading 'What is the new UK address?' in bold. A sub-heading reads 'This is the address where you would like to receive any letters or documents'. Underneath, 'Enter UK postcode' is followed by 'Enter a postcode with numbers and letters' in red. A red-bordered input field is empty. At the bottom left, a yellow button with the text 'Continue' is visible.

263. If they enter a non-UK postcode, the following error screen is displayed:

A screenshot of a web form with a white background. The heading 'What is the new UK address?' is at the top. Below it, a vertical grey bar is on the left. The text 'No address could be found for the postcode' is followed by a redacted postcode '2' followed by a black box. Below this is a grey button labeled 'Edit postcode'. At the bottom, there is a blue link that says 'Enter full address'.

264. The only way around the problem is to choose the ‘Enter full address’ above, or enter a valid UK postcode and then choose ‘I cannot find my address on the list’ link from paragraph 261. The following screen is then displayed, and the status holder could in theory fill in the foreign address but only by entering the Country in the County section:



**What is the new UK address?**

Building and street

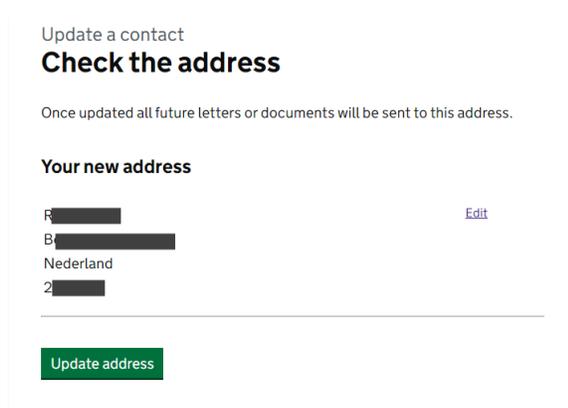
Town or city

County

Postcode

[Continue](#)

265. Doing so results in a final confirmation screen, which shows how unsuitable this workaround is – the postcode is displayed as the final field. Although it is theoretically possible to enter a non-UK address in this way, no-one could feel reassured that this is an acceptable way, or feel confident that any postal correspondence would indeed be sent abroad with sufficient postage paid.



Update a contact

**Check the address**

Once updated all future letters or documents will be sent to this address.

**Your new address**

R  [Edit](#)

B

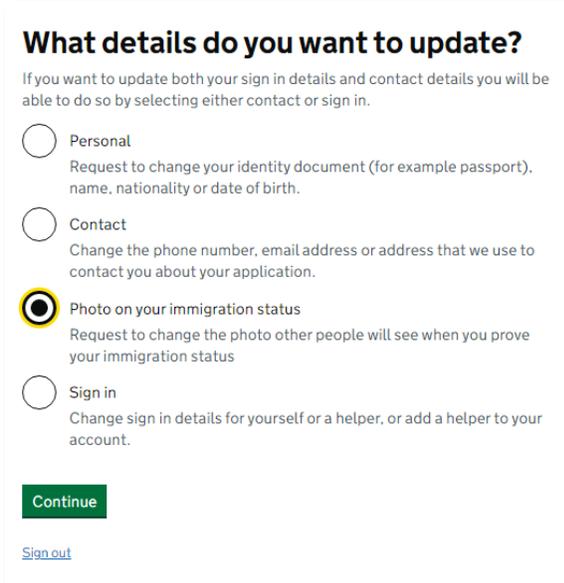
Nederland

Z

[Update address](#)

## Appendix E. Screenshots: Updating photo

266. Since late 2021, it has been possible for people to update the photograph that is displayed in View & Prove. This is done by choosing 'Photo on your immigration status' from the initial menu of choices presented when updating status.

A screenshot of a web form titled 'What details do you want to update?'. The form contains a sub-header, an explanatory paragraph, four radio button options, a 'Continue' button, and a 'Sign out' link.

**What details do you want to update?**

If you want to update both your sign in details and contact details you will be able to do so by selecting either contact or sign in.

- Personal**  
Request to change your identity document (for example passport), name, nationality or date of birth.
- Contact**  
Change the phone number, email address or address that we use to contact you about your application.
- Photo on your immigration status**  
Request to change the photo other people will see when you prove your immigration status
- Sign in**  
Change sign in details for yourself or a helper, or add a helper to your account.

[Continue](#)

[Sign out](#)

267. The first page displayed is an explanation of the photo update process, explaining the three steps of uploading a photo of an identity document, then uploading a photo of the person, and finally a scan of the person's face.

## Before you continue

You've told us you want to change the photo that is displayed on your immigration status.

### When to update your photo

Use this service to change your photo if:

- your facial appearance has changed and you can no longer be recognised from your photo (for example you've had plastic surgery)
- you think your photo is not suitable and you would like to use a different one

### What your photo is used for

When you [prove your immigration status](#), for example to an employer or landlord, they will see your photo and a summary of your immigration status. Border Force officers can see it when you enter and leave the UK.

### What you need to do

1. Upload a photo of your most recent identity document - this helps us keep your identity secure.
2. Upload a new photo of yourself.
3. Scan your face using the camera on your computer or phone. Children aged under 10 will not be asked to scan their face.

### What happens next

We will check your request and let you know if we can make the update or if there was a problem. This usually takes around a week.

[Continue](#)

**!** If you do not do anything for 10 minutes, the service will time out.

If the service times out, anything you have not submitted will not be saved and you will need to start again.

268. For the first step, the person is asked which identity document they want to use. This is so that appropriate photo instructions can be displayed in the next steps, in the same way as described in “Appendix B. Screenshots: Updating personal details – identity document only”.

### Which identity document are you using?

Biometric residence card

Biometric residence permit

Passport

National identity card

[Continue](#)

**▼ What type of biometric residence document do I have?**

It is a residence permit if it says 'Residence Permit' at the top.

It is a residence card if the document says any of the following:

- 'Residence Card' at the top
- 'Permanent Residence', 'EU Family Member', or 'Derivative Residence'
- 'Residence Card of a Family Member of a Union Citizen' or 'Residence Card issued under EEA Regulations' at the bottom
- 'EU Right to Reside' on the back

[Finish and leave service](#)



270. As also mentioned in Appendix B, it would be more useful to put the format information in the previous screen, as the status holder may well have considered all the instructions before, and created for example a .PNG image file with inadequate proportions or size.

## Upload a photo of your passport

You will be able to check your photo meets the rules on the next page.

### Upload a photo

Choose file IMG\_0463.JPG

▼ [What format should my photo be?](#)

The photo must be:

- a jpg or jpeg file
- at least 600px by 750px
- at least 50KB and no more than 6MB

[Continue](#)

[Finish and leave service](#)

271. The status holder is given the chance to check the quality of the photo, and to upload a different photo if necessary. An automated preliminary check is done to check the photo.

## Check the photo of your passport

### Your identity document photo



**Our automated checks suggest**  
the photo does not show the MRZ.

This could be because you have:

- zoomed in or cropped the photo too closely
- uploaded a photo of you and not the identity document
- taken a photo of a photocopy
- covered the MRZ

We recommend uploading a new photo as this one may be rejected.

**If you want to use this photo**  
You can still use this photo if you think the results of our automated checks are not correct.

The photo you submit is your responsibility. We may reject your request if the photo does not meet our requirements.

**Do you want to use this photo?**

Yes, I want to use this photo

No, I want to upload another photo

[Continue](#)

[Finish and leave service](#)

272. For the second step, uploading a photograph of the status holder, extensive instructions are provided about the photo requirements.

### Upload a photo of yourself

#### Photo requirements

The photo must be:

- different to the one in your identity document
- recently taken (no more than 3 months old)
- in colour
- vertical (portrait)
- a jpg or jpeg file

In the photo you must:

- be in even lighting without any glare or reflection
- be in clear contrast to a plain, light-coloured background
- make sure your head, shoulders and upper body are visible
- keep your head straight and look directly at the camera
- have a neutral expression, with your mouth closed and eyes open
- remove your glasses if there is any glare or they are tinted

You must not:

- upload a photo of another photo
- use effects or filters
- have anything covering your face or eyes
- wear a head covering (unless it is for religious or medical reasons)
- have any shadows, objects or people behind you

#### When taking a photo

Make sure your photo meets the following requirements when either taking a selfie or getting someone to take a photo of you:

#### When taking a photo

Make sure your photo meets the following requirements when either taking a selfie or getting someone to take a photo of you:

✓ Plain light-coloured background	✗ Textured background	✗ Object in background
✓ Even lighting and no shadow	✗ Shadow on face	✗ Shadow behind head
✓ Plain expression	✗ Smiling	✗ Looking away from camera

✓ Religious headwear	✗ Fashion hair accessories	✗ Fashion headwear
✓ Eyes fully visible	✗ Glasses covering eyes	✗ Hair covering eyes

[Continue to upload photo](#)

[Finish and leave service](#)

273. As before, the format, proportion and size requirements are only provided at this late stage, after the status holder will have followed all the instructions to take and save a photograph.

## Upload a photo of yourself

You will be able to check if your photo meets our requirements on the next page.

### Upload a photo

Choose file IMG\_0463.JPG

[What format should my photo be?](#)

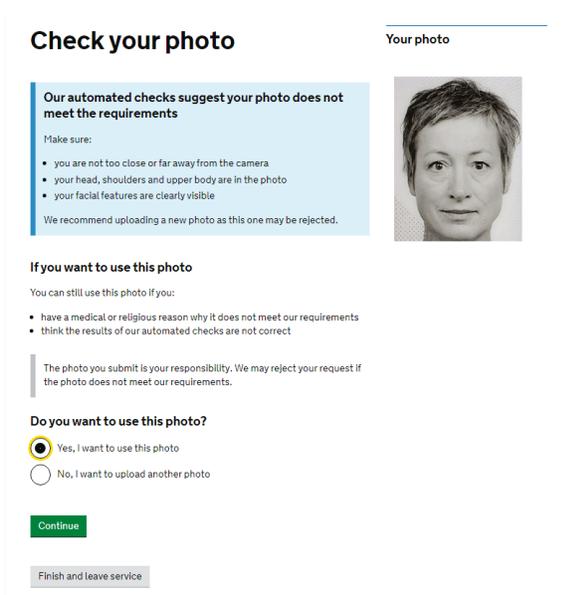
The photo must be:

- a jpg or jpeg file
- at least 600px by 750px
- at least 50KB and no more than 6MB

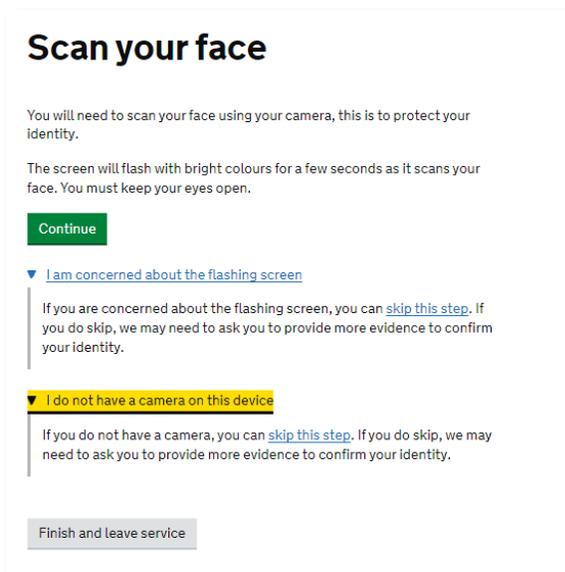
[Continue](#)

[Finish and leave service](#)

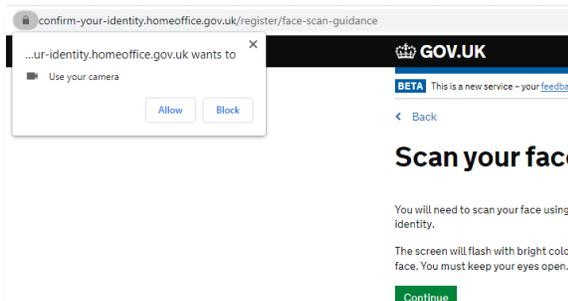
274. The next screen allows the person to check the photograph, and runs some automated checks to indicate whether it might not meet the requirements.



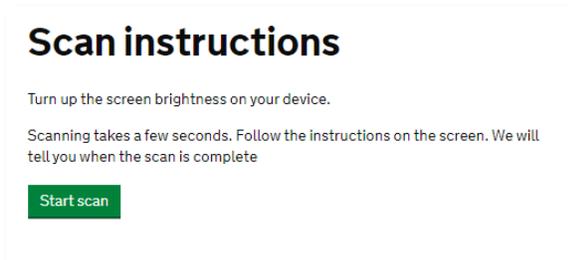
275. The final step is a face scan. This appears to be using the same technology as used in the 'EU Exit: ID Document Check' app when applying for status. This screen explains the process and allows the status holder to skip the step.



276. If the status holder decides to go ahead with the scanning step, the app/browser will ask for permission to use the camera on the phone/computer.

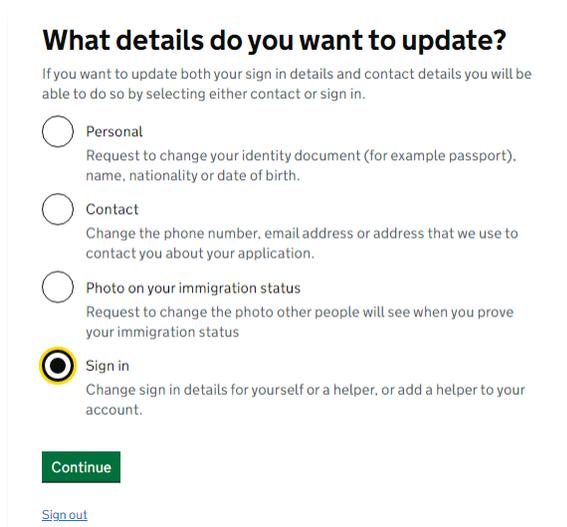


277. Once permission is given, another instruction screen is shown before the status holder can initiate the scan. The author of these screenshots did not proceed beyond this point.



## Appendix F. Screenshots: Updating sign-in details

278. The last type of update process is to update sign-in details.



**What details do you want to update?**

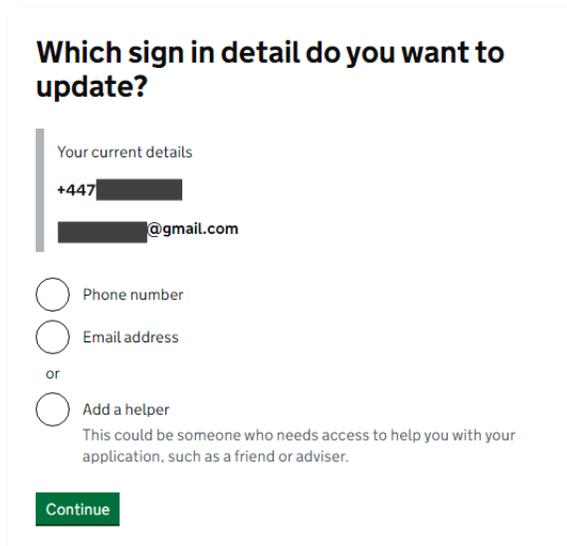
If you want to update both your sign in details and contact details you will be able to do so by selecting either contact or sign in.

- Personal  
Request to change your identity document (for example passport), name, nationality or date of birth.
- Contact  
Change the phone number, email address or address that we use to contact you about your application.
- Photo on your immigration status  
Request to change the photo other people will see when you prove your immigration status
- Sign in  
Change sign in details for yourself or a helper, or add a helper to your account.

[Continue](#)

[Sign out](#)

279. Choosing this shows the status holder’s current sign-in telephone number and email address. Note, these can be different to the contact telephone number and email address, so there is scope for confusion – both the Contact and the Sign-in sections should draw the status holder’s attention to this, and to explain the difference between the two and the implications of changing one and not the other. The screen asks the status holder whether they want to update their sign-in telephone number, their sign-in email address, or add a helper.



**Which sign in detail do you want to update?**

Your current details

+447 [REDACTED]  
[REDACTED]@gmail.com

- Phone number
- Email address

or

- Add a helper  
This could be someone who needs access to help you with your application, such as a friend or adviser.

[Continue](#)

280. Choosing 'Phone number' takes the person straight to a screen asking for the new telephone number. No instructions are given in advance about sending security codes to the new telephone number, as in paragraph 257 when updating contact details. However, the system does send a security code, which is then asked for in the following screen before the number can be updated in the UKVI account.

Update my sign in

### What is your new phone number?

For international numbers include the + symbol with the country code.  
For example, +39133457090.

[Continue](#)

Update my sign in

### Confirm your new phone number

We have sent a 6-digit security code by text message to:

07 [redacted] [Change](#)

It may take a few minutes to arrive.

Enter security code

[Resend code](#)

[Update phone number](#)

281. Choosing 'Email address' goes through the same process as updating phone number, first asking for the new email address, and then asking for the security code.

Update my sign in

### What is your new email address?

[Continue](#)

Update my sign in

### Confirm your new email address

We have sent a single-use code by email to:

[redacted]@gmail.com

It may take a few minutes to arrive.

Enter security code

[Update email address](#)

[Resend code](#)

[Edit email address](#)

282. It is also possible to add a helper to the account.

Add a helper

### Before you continue

We will send confirmation codes to the helper's email address and phone number. You will need to be in contact with them to get the codes.

[Confirm and continue](#)

283. The status holder is asked to enter the helper’s email address, followed by sending and requesting the entry of a security code.

Add a helper

### What is their email address?

[Continue](#)

Add a helper

### Confirm their email address

We have sent a single-use code by email to:

██████████@gmail.com

It may take a few minutes to arrive.

Enter security code

[Continue](#)

[Resend code](#)

[Edit email address](#)

284. Next, the status holder is asked for the helper’s telephone number, followed by sending and requesting the entry of a security code. At this point, if the status holder enters ‘Update telephone number’, the helper is added to the account.

Add a helper

### What is their phone number?

For international numbers include the + symbol with the country code.  
For example, +39133457090.

[Continue](#)

Add a helper

### Confirm their phone number

We have sent a 6-digit security code by text message to:

07 ██████████ [Change](#)

It may take a few minutes to arrive.

Enter security code

[Resend code](#)

[Update phone number](#)