

Annex 5D: Digital failure – the Home Office cost the public £30 million a year with one missing web link

Government handling of a paper form usually costs between £12 and £20, whereas performing a transaction online usually costs around £0.08.¹

While the Home Office generates a profit from its fees for migrants,² it is required to provide some services for free – such as registering a change of home address when someone moves house.

It was notable that for many years, the majority of such change of address forms were sent to the Home Office by post. This was plainly because, until medConfidential drew attention to it, **the official GOV.UK page that signposted the paper form had no link to the online version of the form for the same function.**

- Until March 2021, the ‘Report a change of circumstances if you have a visa or BRP’ page: <https://web.archive.org/web/20210303110800/https://www.gov.uk/change-circumstances-visa-brp>
- Provided a link, for the vast majority of people visiting the page, to a PDF form: <https://www.gov.uk/government/publications/notification-of-change-of-circumstances-form-mcc>
- And only for those currently awaiting a decision to UKVI’s ‘Update your address’ online form: <https://visa-address-update.service.gov.uk/>
- As of April 2021, the page has been changed to offer the online form *first*, and to everyone: <https://www.gov.uk/change-circumstances-visa-brp>

The Home Office generally refuses to say how much any of its services cost – until it is Judicially Reviewed³ – which differs greatly from other Government Departments which also provide change of address-type processes, e.g. the Department for Transport where, since 2015, these have been offered as a digital service for free online – for processes that used to cost vehicle owners £25⁴ when they were done using paper forms on a cost-recovery basis.

For the visa and BRP change of address process, one can estimate that this *single* missing link on *one* Home Office page cost taxpayers an estimated **£27 - 36 million per year**:

In Q1 2020, the ONS Labour Force Survey estimated 3.7 million non-UK nationals were working in the UK,⁵ out of a total of just over 32 million people in work.⁶ Projecting this

¹ See, e.g. <https://webarchive.nationalarchives.gov.uk/20210315085116/https://www.gov.uk/performance/dft-transfer-a-personalised-registration-number> and Annex 4 here:

<https://www.gov.uk/government/publications/digital-efficiency-report/digital-efficiency-report#what-are-the-savings-from-digitising-transactional-services>

² <https://www.thetimes.co.uk/edition/news/hostile-environments-home-office-makes-500m-from-immigration-fees-vgpbm2h6j>

³ <https://www.bailii.org/ew/cases/EWHC/Admin/2019/3536.html>

⁴ <https://www.simplyregistrations.co.uk/dvla-personalised-number-plate-fees-explained/>

⁵ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/migrationstatisticsquarterlyreport/august2020>

⁶ <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/>

proportion across the whole UK population suggests 11% will be migrants with visa or biometric residence permit (BRP) restrictions. Assuming these people are equally likely – though they are probably *more* likely, being younger, less established, etc. – to move as most renters, of whom around 24% move a year,⁷ this suggests a need to process of the order of 1.8 million forms per year. Assuming a processing cost of £20 per paper form arrives at an estimated total of £36 million per annum. (Were the processing cost to be £5 less, at £15 per form, the total would still be £27 million per year – just for visa and BRP changes of address.)

Home Office officials never publicly calculated this figure, but they have confirmed they do have the data were they to have to do so.⁸ In the meanwhile, other government Departments could have simply checked the postal capacity of “PO Box 3468, Sheffield”⁹ and see how it has changed over time.

Additional costs unique to the Home Office?

The Home Office threatens to deport people based on the information that they type into the online form, or which Home Office staff retype from the paper forms to which its page on the GOV.UK website still directs people. The consequences of mistransposition in this manual process may be devastating for individuals, with letters telling people to leave the country being sent on the basis of a typo.

Despite HM Treasury’s Managing Public Money guidance,¹⁰ and the GDS Service Standard,¹¹ both of which state that such costs should be calculated, the Home Office chooses not to. So we have simply applied the methodology first laid out in the 2012 GDS Digital Efficiency Report.¹²

What this paper describes is a year-on-year ~£30 million demand on taxpayers, entirely due to a *trivially-fixable* missing step in the digital pathway; a ‘digital service’ that was barely used... because the Home Office chose not to tell people it was there!

Digital systems can be (and frequently are) designed to place burdens upon users who share particular characteristics. But, in our experience, it is rare to find a situation where it has been so easy to quantify what that burden costs taxpayers.

After a story about this work appeared in the press,¹³ it took the Home Office around 2 months to add the single line that resolved the problem. Annex 5E covers another form that’s festered for over 10 years.¹⁴

bulletins/employmentintheuk/january2020

⁷ <https://blog.shelter.org.uk/2016/02/renting-families-move-so-often-they-are-nearly-nomadic-new-research/>

⁸ <https://www.whatdotheyknow.com/request/701675/response/1680412/attach/5/FOI%2061185.pdf>

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/768465/coc-migrant-12-18.pdf

¹⁰ <https://www.gov.uk/government/publications/managing-public-money>

¹¹ <https://www.gov.uk/service-manual/measuring-success/measuring-cost-per-transaction>

¹² <https://www.gov.uk/government/publications/digital-efficiency-report/digital-efficiency-report>

¹³ https://www.theregister.com/2021/02/01/gov_uk_web_link_50m_taxpayers/

¹⁴ <https://medconfidential.org/2020/universal-credit/#annex5>