

[REDACTED]

From: Madeleine Sumption [REDACTED]
Sent: 20 May 2019 11:59
To: Smith, Lisa
Cc: Theophanidou, Stephanie
Subject: RE: Law Commission Consultation Paper on Simplification of the Immigration Rules

Lisa,
Just to follow up, we have put the figures on a back page of our website so that you have a link if you need it to cite or share: <https://migrationobservatory.ox.ac.uk/resources/commentaries/internet-use-by-country-of-birth/>
Best,
Madeleine

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Madeleine Sumption  
Director  
Migration Observatory at the University of Oxford  
[www.migrationobservatory.ox.ac.uk](http://www.migrationobservatory.ox.ac.uk)  
Twitter: @MigObs  
Press contact: Rob McNeil, tel: +44 (0)1865 274568

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**From:** Smith, Lisa [mailto:[REDACTED]]  
**Sent:** 16 May 2019 09:47  
**To:** Madeleine Sumption  
**Cc:** Theophanidou, Stephanie  
**Subject:** RE: Law Commission Consultation Paper on Simplification of the Immigration Rules

This is so interesting to see. Thank you so much for sending.  
We will bear in mind what you say about the need for more transparent data on the characteristics of applicants.

Best wishes,  
Lisa

**Lisa Smith | Law Commission**  
Lawyer, Public Law Team

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**From:** Madeleine Sumption [mailto:[REDACTED]]  
**Sent:** 15 May 2019 22:14  
**To:** Smith, Lisa [REDACTED]  
**Cc:** Theophanidou, Stephanie [REDACTED]  
**Subject:** RE: Law Commission Consultation Paper on Simplification of the Immigration Rules

Lisa,  
Sorry for the delay getting this to you.  
I have attached the data on last internet use by country of birth. Overall the large majority of people say that they have used the internet in the past 3 months, and those who do not are mostly older and are more likely to be women.

As you may have seen, we have a brief discussion of what this means in our 'Unsettled Status' [report](#), including reference to other research that suggests most people who do not use the internet do have someone else who can use it for them (a 'proxy user') But I think it is reasonable to use these figures as a rough indicator of a population that is not particularly digitally savvy.

As for how people who are not digitally connected access help, I am not aware of any data on this. However, there has been some qualitative research related to the EU settlement scheme that has suggested that among migrant communities people often ask family and friends or rely on supposedly knowledgeable people in the community (some more knowledgeable than others, in practice), sometimes for a fee (unregulated by OISC). See [here](#) for example.

The other point to mention (though potentially beyond the scope of your consultation) is that the move online in principle presents some opportunities for the government to provide more transparent data on the functioning of the immigration system. At present we know relatively little about the characteristics of applicants, their experience or their journey through the system. A mostly digital system provides an opportunity to remedy this, but it does need to be built into the design to some extent.

I hope this is helpful.

Best,  
Madeleine

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Madeleine Sumption
Director
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From: Smith, Lisa [REDACTED]
Sent: 11 April 2019 14:43
To: Madeleine Sumption
Cc: Zovanga Kone; Theophanidou, Stephanie
Subject: Law Commission Consultation Paper on Simplification of the Immigration Rules

Dear Madeleine,

Thank you for your response.

It would be very helpful to see the data you have on non-internet users. We have heard informally from those conducting community outreach projects that in many instances their sessions will be held without access to computers (for example in a community hall), but this does not give us any idea of numbers. We have sent the consultation paper to CAB's and law centres, but do not yet know if they will respond, or whether they will be in a position to provide this information.

We are interested in any other data you have which might feed into the question we have posed in our paper as to whether having an online application system may be problematic. Initial feedback from consultation events has suggested that one issue is how a user who is not able to use the online system will be able effectively to access any exceptional provision of assistance by the Home Office. An example of this would be an inability to access the correct channels to request use of a paper application, or to get Home Office help to make an online application.

We have also had suggestions that better links are needed if the user needs to ask for help and information. There is a very expensive helpline, but it appears that it is otherwise difficult to get telephone or face-to-face help. Do you have any data around how those excluded from digital systems are able to access help?

If you think you may have other data that might assist us, please let us know.

Many thanks for your help.

Best wishes,

Lisa

Lisa Smith | Law Commission
Lawyer, Public Law Team

From: Madeleine Sumption [REDACTED]
Sent: 08 April 2019 15:38
To: Smith, Lisa [REDACTED]; Zovanga Kone [REDACTED]
Cc: Theophanidou, Stephanie [REDACTED]
Subject: RE: Law Commission Consultation Paper on Simplification of the Immigration Rules

Lisa,

Many thanks for sending this. What you are proposing all looks very sensible though I suspect that as researchers rather than practitioners we are not best placed to comment on the finer details of how a new system should be designed.

However if there are specific data-related questions we can help with, we'd be happy to. (For example we could run some figures for you on non-internet users if that would be helpful.)

Best wishes,
Madeleine

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Madeleine Sumption  
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**From:** Smith, Lisa [REDACTED]  
**Sent:** 02 April 2019 15:08  
**To:** Madeleine Sumption; Zovanga Kone  
**Cc:** Theophanidou, Stephanie  
**Subject:** RE: Law Commission Consultation Paper on Simplification of the Immigration Rules

Dear Ms Sumption and Mr Kone,

We sent our consultation paper on the Simplification of the Immigration Rules to the Migration Observatory on 21 January 2019 (see below).

Since this time, we have met with the Public Law Project who told us about your April 2018 report on the risk of exclusion, including digital exclusion, of EU citizens from the settlement scheme.

Our consultation paper considers the accessibility of online application forms and the online presentation of the Immigration Rules at chapter 14. We would be very interested to know your views. I am for this reason forwarding

the link to you directly as the authors of the report. Please note that it is not necessary to respond to all the consultation questions if you do not wish to do so.

The deadline for consultation responses is 26 April 2019.

Best wishes,

Lisa Smith

**Lisa Smith | Law Commission**  
Lawyer, Public Law Team

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**From:** Smith, Lisa  
**Sent:** 21 January 2019 14:51  
**To:** Smith, Lisa [REDACTED]  
**Subject:** Law Commission Consultation Paper on Simplification of the Immigration Rules



**Law Commission**  
Reforming the law  
**Comisiwn y Gyfraith**  
Diwygio'r gyfraith

Dear Sir/Madam,

I am pleased to inform you that the Law Commission's Consultation Paper on Simplification of the Immigration Rules has been published today.

The consultation paper reviews the Immigration Rules in order to identify the underlying causes of their complexity, and to identify principles under which they can be redrafted to make them simpler and more accessible.

It makes a number of preliminary proposals to pave the way for the introduction and maintenance of clear, comprehensible and logically organised Rules, and asks whether consultees agree. It also seeks the views of consultees on more open questions.

Consultees are invited to respond to the paper by 26 April 2019.

The consultation paper can be downloaded from our website at <https://www.lawcom.gov.uk/project/simplifying-the-immigration-rules/>. It is published alongside a summary, which is available in both English and Welsh.

Yours faithfully,

Lisa Smith

**Lisa Smith | Law Commission**  
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