



Inspection of the UK Border Agency in Scotland and Northern Ireland: Border Operations

August 2010 – January 2011

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Independent Chief Inspector of the UK Border Agency

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Foreword from John Vine CBE QPM



This inspection assessed the work of the UK Border Agency's border operations in Scotland and Northern Ireland. It forms part of a wider inspection which is comprised of three parts: the Agency's border operations, the Common Travel Area and representation at first tier appeals in Scotland.

At the time of the inspection, Border Force was one year into a programme integrating the work of immigration and illicit commodity detection. The UK Border Agency's Border Force officers in Scotland and Northern Ireland work to intercept and seize illicit commodities as well as identify those who do not have the right to enter the UK. I found that the focus of staff deployment at airports is concentrated on the Primary Checkpoint, potentially at the expense of illicit commodity detection. I believe a better balance should be found by the Agency to address these competing demands.

At the ports I inspected, I was surprised to find that the Agency had not made any seizures from freight containers for the 14 month period between the end of September 2009 and our inspection in November 2010. Additionally, there were very limited class A drugs seizures over a similar timeframe.

I was also concerned that the significant challenge of managing the risks presented by small airfields and harbours has not been met. I recommend that a multi-agency approach to the risk assessment of small ports is established both locally and nationally. This would also leverage the expertise of the police who have a well established role in assessing the risks posed by terrorism and organised crime.

Overall, I found that the Agency needs to improve its intelligence picture to better inform how it will address threats to the UK border in Scotland and Northern Ireland.

A handwritten signature in black ink that reads 'John Vine' followed by a period.

John Vine CBE QPM
Independent Chief Inspector of the UK Border Agency

1. Executive Summary

1. The inspection involved collecting evidence to measure the efficiency and effectiveness of operations at the border in Scotland and Northern Ireland by assessing:
 - the deployment of staff to Aberdeen Airport, Edinburgh Airport and docks and Belfast International Airport and docks;
 - the risk assessment of ports with no permanent UK Border Agency presence;
 - how detection staff select people, vehicles and freight for search;
 - treatment of passengers; and
 - how the Agency engages and works with stakeholders and delivery partners.
2. There was no evidence of unfair treatment during our observations of people being stopped for search by detection officers. However this was based on limited observations of primarily European Economic Area (EEA) nationals. Officers were able to explain the reasons for stopping each person we saw stopped by teams at Aberdeen, Belfast and Edinburgh.
3. Independent evidence from passenger surveys and the low number of written complaints were consistent with our observations that staff were courteous and professional. In all three locations, officers stated complaints were frequently received, but only nine verbal complaints were recorded in the first six months – failure to log all complaints and report them to the Border Force Customer Service Unit is contrary to policy.
4. Stakeholder relations were good. Port operators spoke highly of the Agency and credited senior managers in Scotland and Northern Ireland with improving stakeholder relations. In Edinburgh, senior management and the airport operator worked well together to mitigate a potential security breach.
5. As part of the integration training, all officers operating the Primary Checkpoint (PCP) have received 'Referral to Secondary Examination' training and are now designated as Customs Officers under sections 78 and 163A of the Customs and Excise Management Act (1979). The effect is that officers on the PCP can work in both an immigration and customs detection capacity and can refer a person on from the PCP for further investigation for either a customs or immigration purpose. This has increased the capability of officers at the PCP to detect potential illicit commodities. Training to enhance detection capability at ports continues with the legacy immigration officers.
6. At all the ports inspected, we found the Primary Checkpoint was the main focus for the Agency. This was to meet both the requirement to verify all passengers against security and immigration databases and meet internally set queuing targets. This emphasis reduced the officers available to identify imports of illicit goods through detection work. A better balance needs to be found between deploying officers to the PCP and detection work.
7. We found that deployment of officers to identify illicit goods was informed by the Agency's strategic priorities. Local assessments of flights were based on past practice, previous seizures, new trends based on seizures as well as intelligence. However, in 2010, there had been no seizures of class A drugs by teams at Aberdeen, with only small seizures at Belfast and Edinburgh. This is despite class A drugs seizures being set as one of the highest priorities for the Agency indicating an intelligence gap.

8. Deployment of staff was reactive, with duties changed at short notice in response to intelligence. We found a real commitment from officers to identify and seize illicit commodities, sharing information on trends and using local knowledge to good effect. However, over-reliance on historical information led to repeated targeting of the same flights.
9. This emphasis on tried and tested routes could leave other routes open to abuse as those willing to circumvent the system make use of flights with less coverage, knowing they are unlikely to be apprehended.
10. There was little coverage of air freight or commercial shipping and little activity to counter the potential threat of movement of illicit commodities over the Irish land border. There had been no seizures from the scanning of freight containers at Belfast and Grangemouth for the 14 month period between the end of September 2009 and our inspection in November 2010.
11. Very little risk assessment work was performed on the threats and risks posed by small air fields and harbours and it was unclear who had responsibility for this area. We found no threat assessments had been undertaken since March 2008.
12. The Agency generally had a good working relationship with the police. However, there is no evidence of joint risk assessments of small ports despite Special Branch conducting visits to these ports to map the risks posed by terrorism and organised crime.
13. Overall, there was a need to improve the comprehensiveness of the intelligence picture to better inform the threats to the border, including the risks posed by small ports.

2. Summary of Recommendations

We recommend that the UK Border Agency:

1. Deploys resources effectively to maintain the control of illicit commodities with the staffing of the Primary Checkpoint (PCP)
2. Identifies and addresses intelligence gaps to improve the intelligence picture to better inform the risks to the border.
3. Ensures that plans and associated control strategies are published in a timely manner to inform staff and allow more effective targeting of resources
4. Devises a strategy to address the threat posed to the border by illicit commodities and people through small ports.
5. Puts in place local comprehensive written guidance for staff dealing with General Aviation¹, including compliance visits.
6. Ensures that frontline staff provide feedback and that it is used to inform the targeting process
7. Initiates a multi-agency approach to risk assessing small ports, working with the police, port operators and any other relevant organisations.

¹ General aviation (GA) is one of the two categories of civil aviation. It refers to all flights other than military and scheduled airline and regular cargo flights, both private and commercial.

3. The Inspection

3.1 The role of the Independent Chief Inspector of the UK Border Agency was established by the UK Borders Act 2007 to examine the efficiency and effectiveness of the UK Border Agency. The Border Citizenship and Immigration Act 2009 widened the Chief Inspector's role to cover customs functions and the work of contractors.

3.2 The Chief Inspector is independent of the UK Border Agency and reports directly to the Home Secretary.

Purpose and Aim

3.3 To undertake an inspection of the UK Border Agency's operations in Scotland and Northern Ireland, collecting evidence to enable the Chief Inspector to make an assessment of the Agency's efficiency and effectiveness.

Scope

3.4 This report assesses the work of the UK Border Agency's Border Force operations in Scotland and Northern Ireland – in particular it looks at:

- the deployment of detection staff to the following air and seaports: Aberdeen Airport, Edinburgh Airport and docks and Belfast (Belfast International Airport) and docks; we chose these ports given the concentration on Glasgow for the other parts of the inspection.
- the risk assessment of small ports for both people and goods, where no permanent Agency presence exists;
- how detection staff select people, vehicles and freight for search;
- the treatment of passengers by Agency officers, in terms of general courtesy and discrimination through profiling; and
- how the Agency engages and works with stakeholders and delivery partners.

Methodology

3.5 A one day pre-inspection planning meeting was held at Glasgow on 23 August 2010. The onsite phase covering three locations of the inspection took place from 1 November 2010 to 10 January 2011.

3.6 A range of methods were used during the inspection, including:

- assessment of a wide range of evidence provided by the Agency
- interviews and focus groups of a variety of staff in three locations
- observations at Primary Checkpoints (also known as passport control), the secondary examination areas and of container freight scanning; and
- consultation with a range of stakeholders. (see Appendix 2)

3.7 The inspection team provided feedback on high level emerging findings to the UK Border Agency nine days after the completion of the onsite phase of the inspection.

3.8 The inspection identified seven recommendations for improvement to operational service delivery of UK Border Agency operations in Scotland and Northern Ireland. A full summary of recommendations is provided on page 5 of this report.

4. Background

4.1 The UK Border Agency is divided into seven operational business areas:

- Border Force
- International Group
- Immigration Group
- Intelligence Group
- Criminality and Detention
- Corporate Services
- Strategy and Policy

The majority of UK based staff work within either Immigration Group or Border Force.

Border Force

4.2 The UK Border Agency was formed in 2008 following the amalgamation of the Border and Immigration Agency, UK Visas and Her Majesty's Revenue and Customs (HMRC). At the time of the inspection, Border Force had around 9000 staff following the formal permanent transfer of over 4000 'customs' staff from HMRC on 5 August 2009. The creation of a single Border Force within the UK Border Agency was designed to *'create a multi-skilled integrated workforce to improve security at the border, facilitate legitimate travel and trade and provide increased flexibility to tackle areas of greatest risk and pressures'*.

4.3 At the time of the inspection, Border Force was one year into a programme integrating the work of immigration and illicit commodity detection. As part of the integration training, all officers operating the Primary Checkpoint (PCP) have received 'Referral to Secondary Examination' training and are now designated as Customs Officers under sections 78 and 163A of the Customs and Excise Management Act (1979). The effect is that officers on the PCP can work in both an immigration and customs detection capacity and can refer a person on from the PCP for further investigation for either a customs or immigration purpose. The effect of the training is to increase the capability of officers at the PCP to detect potential illicit commodities. Training to enhance detection capability at ports continues with the legacy immigration officers.

Border Force North

4.4 Scotland and Northern Ireland are within Border Force North Region; the largest geographical Border Force region which has an extensive coastline. The region is responsible for a number of major air and sea ports whilst at the same time managing the risk posed by numerous small air and sea ports. Border Force staff have operational responsibility for immigration controls and the detection of illicit goods. They also seize cigarettes and tobacco on behalf of HMRC who retain responsibility for the collection and enforcement of tobacco duties as part of the excise tax regime. Border Force North region is itself divided into five sub-regions, called commands.

Figure 1 shows the organisational structure of the senior management team in Border Force North.

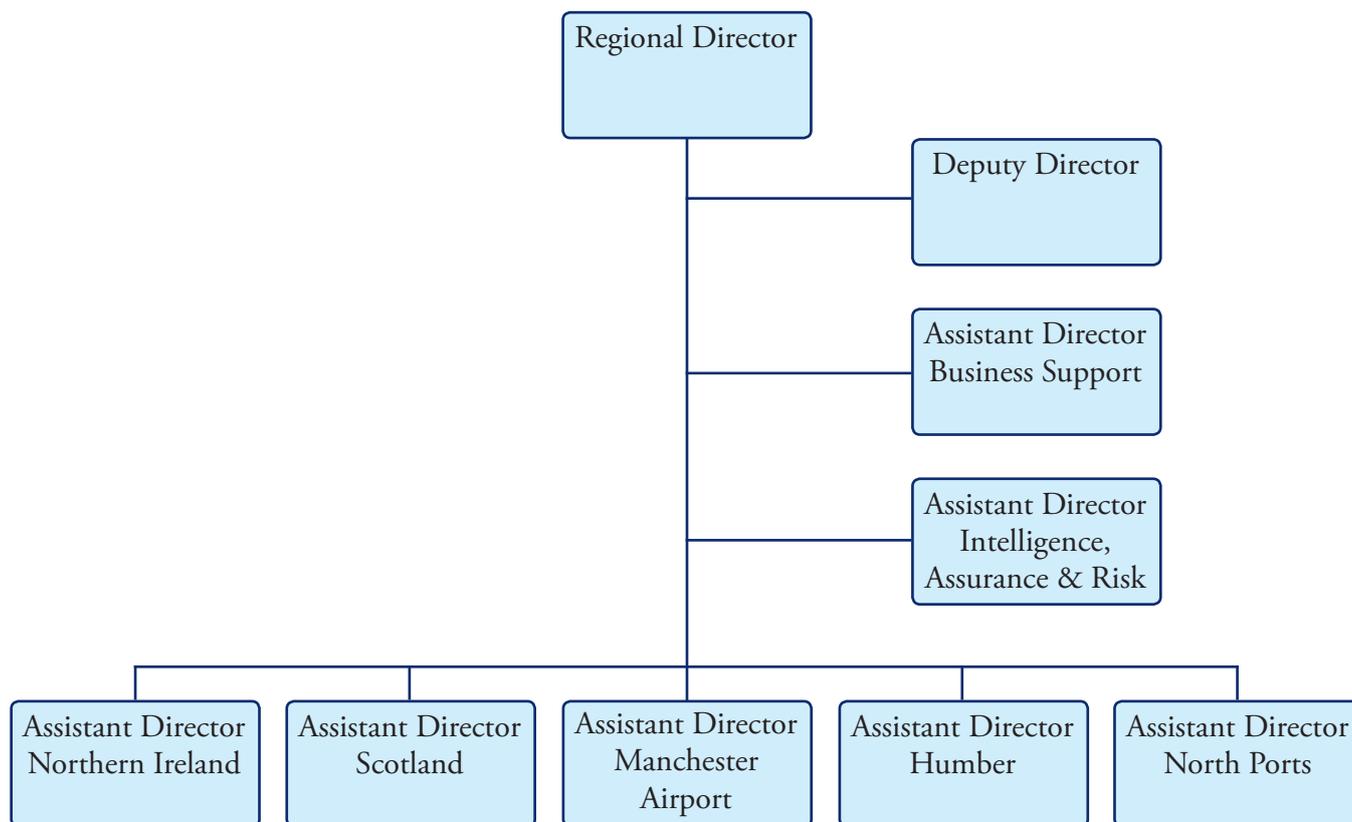


Figure 1 Border Force North – Senior Management Team

Scotland and Northern Ireland Region

- 4.5 At the time of the inspection, operations in Scotland and Northern Ireland were each under the command of an Assistant Director. We set out below the details of the three airports inspected, covering the geographical spread and variation in work of each.
- 4.6 Aberdeen covers the area from the north bank of the Tay to Oban. They had 33 staff² in total made up of three teams: one at the PCP and two focussing on detection work. Numbers of staff were roughly equal with 17 staff available for the PCP and 16 for detection. Four part-time staff were based in remote locations: Inverness, Oban and two in Lerwick.
- 4.7 Edinburgh covers the east of Scotland from the south bank of the River Tay to the border. The western boundaries are those of the Strathclyde and Dumfries and Galloway police forces. Edinburgh had 59 staff in total divided into eight teams, four on the PCP and three working on detection duties at the airport. One team covered freight to deal with container traffic at Grangemouth and the Zeebrugge ferry at Rosyth, with assistance from one of the airport teams if required. Numbers were almost equal with 30 staff allocated for the PCP and 29 for detection. The actual number of staff for detection work was reduced by five officers when the mobile Cyclamen³ unit was in operation.
- 4.8 Belfast covers the whole of Northern Ireland with 57 staff divided into six teams – three on the PCP, two for detection work at the airport and one on freight to cover containers at Belfast docks. The freight team also checks undelivered parcels and covers international trade on behalf of HMRC. There were 17 staff available for the PCP, 28 for detection at the airport and 12 for freight.

² Numbers taken from organograms supplied by UKBA excluding Higher Officers/Chief Immigration Officers or Senior Officers/Immigration Inspectors who manage the teams

³ Radiation detection unit

- 4.9 In addition to Belfast International Airport, during the summer, daily international flights arrive at the City of Derry Airport which is 75 miles from Belfast. Belfast City Airport also has a limited number of international flights mainly from the European Union and interlined bags⁴ from third countries where passengers have cleared passport control at Heathrow but their bags have not been checked for illicit commodities.
- 4.10 Detection staff in Belfast also have responsibility for the land border from the Republic of Ireland. However, with 320 miles of the border, 302 recognised border points, as well as the considerable political and security issues, no detection work has been carried out on the border and countering the threat remains a difficult issue for the UK Border Agency.

⁴ Bags owned by passengers who have cleared detection at Heathrow but their bags have come straight to Belfast.

5. Inspection findings – High level outcomes of the business

Operational policies, priorities and deployment of staff is driven by clear analysis of environment, risks, threats, capabilities and impact.

Deployment priorities

- 5.1 Deployment of Border Force staff is driven by priorities set out in the Border Force Control Strategy. These priorities were disseminated to all regions via the strategic Tasking and Co-ordination Group meetings (TCG). Staff are informed of priorities through the briefing process.
- 5.2 Although the Border Force Control Strategy provides details of the risks to, and subsequent priorities for, Border Force as a whole, we were told by a senior manager that the top priorities could be summarised at high level as those stated for critical incidents. These are as follows:
1. staffing the Primary Checkpoint (PCP);
 2. Cyclamen⁵;
 3. custody (there were no custody facilities in the ports inspected);
 4. detection of class A drugs; and
 5. detection of other illicit commodities.
- 5.3 The focus on staffing the PCP is to ensure entry to the UK is checked and also that customer service standards are met. A key performance indicator of the Agency is to meet the following queuing times:
- 95% of European Economic Area (EEA) passengers to wait no longer than 25 minutes;
 - 95% of non European Economic Area (EEA) passengers to wait no longer than 45 minutes.
- Performance in terms of identifying illicit commodities was measured by contribution to national targets. Each region had specific targets for each commodity. However, there were no specific targets for the Northern Ireland and Scotland commands. Instead, the commands were allocated 'indicative' targets to measure their contribution to the overall regional target. The UK Border Agency could not explain their rationale for how indicative targets were allocated, nor were we provided with documentary evidence to show how they were allocated. There were no specific targets for individual ports.
- 5.4 We found that staff were fully aware of the indicative targets and current priorities. Through our interviews and discussions, it was clear they were aware of the indicative targets set individually for the commands of Scotland and Northern Ireland and how these contributed to the national targets. Reinforcing our recent inspection findings at Manchester Airport, we found it difficult to understand how each port's performance could be measured without specific port targets.
- 5.5 However, we note that the UK Border Agency has recently (in December 2010) accepted our recommendation from the Manchester Airport report⁶ to review the rationale behind Border Force targets, including how productivity performance in tackling smuggling risks might be best assessed.

⁵ Radiological and nuclear detection unit. The tasking of staff to operate Cyclamen is assessed by a central team; deployment required for 25% of Rosyth traffic

⁶ <http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/UKBA-response-Manchester-Airport-report.doc.pdf> An inspection of border control at Manchester Airport

Primary Checkpoint (PCP)

- 5.6 The UK Border Agency told us that the main priority of Border Force, since the integration of immigration and detection functions, has been the staffing of the Primary Checkpoint (PCP). Statistical evidence, our observations and all grades of staff confirmed this focus.
- 5.7 Every passenger arriving on a scheduled international flight must have their passport checked, with non-EEA nationals also asked a series of questions or for additional documents to see if they meet the requirements for entry into the United Kingdom.
- 5.8 Until 2007, EEA citizens were allowed to enter the UK following a check that their passport or identity card was genuine. Since 2007, swipe checks against an intelligence database, known as the Watchlist Index⁷, operate for all arriving passengers including EEA nationals.
- 5.9 The number of officers staffing the PCP is determined by the number of passengers arriving; it is demand led. In contrast, detection officers are risk led; the number of passengers does not necessarily determine the number of officers in the secondary examination area.⁸ Detection officers seek to identify the smuggling of illicit commodities using a variety of methods such as intelligence and profiling, selecting individuals most likely to be carrying prohibited substances. This includes flights, ferries, freight operations at air and sea ports and commercial shipping.
- 5.10 We found extremely strong views across a wide range of officers that the training and deployment of detection officers to the PCP had reduced the resources available for secondary examination. As well as being scheduled to PCP duties, detection officers said that they were frequently removed from detection work for short spells to reduce the length of time passengers had to queue through passport control. Managers confirmed that staffing of the PCP took precedence over the detection of goods, which was also confirmed by our observations. We also found this in our recent inspection of Manchester Airport.
- 5.11 Information was provided from Aberdeen and Edinburgh on the time spent by detection officers on the PCP over the last two years. This included time spent on training, mentoring, scheduled shifts and ad hoc time. Belfast supplied information from April 2010.
- 5.12 The statistics below show the percentage of time detection officers spent on the PCP:
- 4% at Aberdeen over two years;
 - 15% at Edinburgh over two years⁹, off-set by two immigration officers working on detection over the same period; and
 - 15% at Belfast for scheduled shifts since April 2010, 40% when training / mentoring included.
- 5.13 While the figures varied from port to port, evidence showed detection resources were affected by the emphasis on the PCP. This confirmed our observations that three of the officers at the PCP were detection officers. This was on a flight considered to be high risk for the illicit importation of cigarettes.
- 5.14 We consider that the Agency should review the balance between staffing the PCP with allocating detection officers to identify illicit commodities where queuing times were being met¹⁰. This had been recognised by the head of Border Force in a recent internal publication.

⁷ Watchlist Index – a database of names available to the UK Border Agency of those with previous immigration history, those of interest to detection staff, police or matters of national security.

⁸ An area where UK Border Agency officials may be involved in the questioning of passengers and searching of baggage, freight and vehicles

⁹ Edinburgh detection resource to the PCP was counter balanced by having two legacy immigration officers working as a detection resource for two years and a Chief Immigration Officer for 4 months. The Agency estimates the embedded immigration resource in detection teams as approximately 9% over the last 2 years and say from June to September this year the cross deployments were equal.

¹⁰ July 2010 UKBA performance packs show North region exceeding queuing times at 98%. Border Force weekly seizure report w/e 4 January 2011 shows North region exceeding queuing times at 99%.

We recommend that the UK Border Agency:

Deploys resources effectively to maintain the control of illicit commodities with the staffing of the Primary Checkpoint (PCP)

Illicit Commodities

- 5.15 We inspected how detection officers were deployed to airports and docks to identify class A drugs and other illicit commodities. We also examined how the risk of smuggling over the land border from the Republic of Ireland was addressed. Lastly, we examined how the risk through small ports was managed, both in terms of illicit commodities and people. We also comment on commercial shipping.

Airports: deployment plans

- 5.16 Daily staff deployment was directed by the following sources of information:
- Specific targets, relating to individuals, from Targeting and Selection (T&S)¹¹ hubs based on scrutiny of flight manifests;
 - Specific intelligence from the police or other agencies;
 - Any specific tasking from the TCG;
 - National Border Targeting Centre (e-Borders) alerts;
 - Profiling of individuals from high risk flights;
 - Profiling of flights or individuals from other flights.
- 5.17 Staff rosters are matched to flight schedules. At Edinburgh, rostering is performed three months in advance, at Aberdeen six weeks, and Belfast six months in accordance with the distinct summer and winter airline schedules.
- 5.18 Despite resources being allocated in advance, we saw no evidence of this impacting on the Agency's ability to react to specific intelligence. At Belfast Airport, we were told about the targeting of a flight which was not normally covered, following the receipt of intelligence from the police. This coverage at very short notice resulted in a seizure of half a million cigarettes and demonstrates the value of flexible teams. Targeting the same flight a week later resulted in a further seizure of 300,700 cigarettes.
- 5.19 Teams at Belfast estimated that 50% of their deployment was based on targets from the T&S hub but they could not give exact figures; staff said they got more results from profiling using historical knowledge. We found no analysis of the source of their seizures, whether they came from T&S targets or from profiling. In the 10 months to 31 January 2011, Edinburgh Airport received 35 targets for air passengers, an average of one per week. Aberdeen received fewer than this. All three airports completed feedback sheets on targets and sent these to the hub. Local records were not kept.
- 5.20 Managers planned staff deployment using the results of past seizures, known routes and new trends based on seizures. This was supplemented by information from commodity delivery plans¹² and monthly tactical threat assessments¹³. We found the information contained in these assessments reinforced the deployment decisions made on past seizures and known routes. Information on significant seizures made by the teams was sent to an intelligence team to inform future threat assessments.

¹¹ See glossary

¹² There are national delivery plans for each commodity from which flow monthly commodity delivery plans detailing the recommended focus for operational activity.

¹³ Monthly tactical threat assessments report previous seizures, intelligence and information from various sources to recommend which routes should be targeted

Deployment to Risk

- 5.21 We saw evidence of staff deployment to flights deemed most likely to be carrying class A drugs and cigarettes at all three airports. High risk flights for cigarettes were identified mainly from past practice. High risk flights for drugs were identified from known routes and trends identified in monthly commodity delivery plans and tactical threat assessments.
- 5.22 Despite aiming for maximum coverage of these flights at all three airports there were no class A seizures by teams at Aberdeen in 2010. In Edinburgh, there had been four personal use class A seizures, and small amounts were seized by teams in Belfast. This was despite class A drugs being set as the highest priority of the Agency.
- 5.23 This could mean either that class A drugs were not coming through these airports or that they were being missed. We saw no evidence of a local risk assessment of what illicit commodities posed the greatest threat in any of the airports. We consider that national priorities may be driving local priorities even though the local risks may be different.
- 5.24 We did not gauge the effectiveness of performance against indicative targets as they were not specific targets to drive improvement but they do provide an idea of performance. For the six month period to 30 September 2010¹⁴ teams at Aberdeen and Edinburgh seized 1,022,112 cigarettes against an indicative 12 month target of 12 million cigarettes for Scotland. Teams at Belfast had seized 2,186,500 cigarettes against an indicative 12 month target of 8 million for Northern Ireland, demonstrating the relative weakness of the indicative targets. This aligns with our findings from the Manchester Airport report. Information received after our inspection indicated that Belfast had increased their seizure rate and had seized 7.4 million cigarettes by March 2011.

Getting the Balance Right

- 5.25 Teams at Belfast analysed flights from which they had obtained seizures and in the absence of specific intelligence from the hubs gave priority to targeting these flights.
- 5.26 Flights from Belfast City Airport and the City of Derry Airport had been designated low risk, using historical knowledge, with the exception of one flight identified as a weapons risk. What may have been low risk flights based on local knowledge and historic results, may no longer be the case. We saw little evidence of the risk assessments being refreshed.
- 5.27 Due to the small number of targets provided by the T&S hub, teams at Aberdeen and Edinburgh almost exclusively deployed staff based on profiling.
- 5.28 There was evidence of informal face to face briefings to inform this profiling and dissemination of trends to staff via regular emails. Some staff also had access to *Intelnet*, an intranet site showing information on national trends and seizures. All detection officers at Aberdeen had access to *Intelnet*, 60% at Belfast but only 25% of officers had access at Edinburgh. This was despite the recommendation in the HM Inspectorate of Constabulary report '*Customised for Control*' in 2008¹⁵ that all officers should have access, particularly relevant given the high amount of self-profiling.
- 5.29 New routes were assessed for risk using information and intelligence supplied by the T&S hubs. We saw evidence in the operational activity plan (June to September 2010) of the requirement to test two new routes by teams at Edinburgh. The local team planned to focus on these two new routes to build local knowledge about the routes and associated risks. They had also changed shift times to meet a new flight which was a known route for cigarettes.

¹⁴ Figures taken from a national database for the period ending September 2010 in the absence of more recent local records from all three areas to allow comparison

¹⁵ HMIC report published in 2008 on HM Revenue and Customs before the merger of some of their functions with the UK Border Agency http://www.hmic.gov.uk/sitecollectiondocuments/hmrc/hmc_20080618.pdf

- 5.30 Deployment of detection officers was largely based on profiling and reliance on historical information. This was clearly the case in the targeting of flights for cigarettes and Products of Animal Origin (POAO) with some success. While using local knowledge can be positive, targeting flights from which there have been historic successes can lead to self-fulfilling intelligence.
- 5.31 ‘Self-fulfilling intelligence’ occurs when the targeting of flights and results drives future targeting. In essence it means that other flights, which could have carried individuals of interest, are potentially being missed. This finding was identified in the *‘Customised for Control’* report mentioned above. We regarded the continued reliance on historic data as being a block to the Agency building and refreshing a fuller intelligence picture.

Deployment: freight

- 5.32 We found there had been no positive results from searching container freight at Belfast and Grangemouth for the 14 months prior to our inspection in November 2010. Belfast received 1,339 targets from 1 September 2009 to 31 October 2010 from the T & S hub. They also self-selected 262 containers. The last seizure was 10.34 million cigarettes from a T&S target on 29 September 2009.
- 5.33 Results from Grangemouth were similar. They received 1076 targets between 1 September 2009 and 31 October 2010. There were no positive results.
- 5.34 For Rosyth, there were also no significant seizures from the Zeebrugge ferry. From 1 September 2009 to 31 October 2010 there were two targets for accompanied freight from the relevant T&S hub. There were no targets for tourist traffic, nor any targets for unaccompanied freight. Activity was therefore based on profiling and trends from tactical threat assessments.
- 5.35 We queried the continued negative results, particularly as freight teams provided feedback to the T&S hub on the Freight Targeting System¹⁶. Officers gave a particular example of referrals being made despite the information being old e.g. the information relating to a drugs seizure from 10 years ago still creates a target to be investigated. The Targeting team reported only receiving direct feedback on positive hits, relying on controls via a spreadsheet to prevent continued targeting of negative hits. We comment further and make a recommendation about feedback to T & S hubs later in this report.
- 5.36 We did not inspect the effectiveness of the container T & S team in particular, nor did we inspect the effectiveness of the process of having a range of remote T & S teams. However, there appeared to be an intelligence gap in regards to container traffic and an issue with feedback informing further targets which in turn inform deployment.
- 5.37 Given the lack of seizures at Belfast and Grangemouth, managers redeployed some freight team officers to Belfast and Edinburgh airports. We saw no evidence that consideration had been given to moving these officers to address other risks such as the risk assessment of small ports.
- 5.38 We also noted a gap in the coverage of air freight: teams at Aberdeen and Belfast did not cover air freight. Belfast management said that it arrived during the night when there were no officers available and there were no targets from T & S. Teams at Edinburgh, by contrast, had an agreement with Special Branch to cover air freight jointly three times a week. We were concerned at the lack of targets and inconsistency of coverage, despite the fact that the threat from air freight was identified as a risk in a recent intelligence document¹⁷.

Illicit commodities from the Republic of Ireland

- 5.39 While we were predominantly inspecting the deployment of airport and freight detection teams, officers at Belfast made us aware of their concern about the low number of operations to counter the smuggling of cigarettes and drugs from the Republic of Ireland (ROI). They saw the main threats as being over the land border and ferries between Northern Ireland and Great Britain carrying traffic to

¹⁶ System used to risk assess freight movements.

¹⁷ Internal document published August 2010 analysing sources of heroin seizures.

and from the ROI. Intelligence gaps over the movement of illicit goods between the ROI, Northern Ireland and Great Britain were identified in a document produced by Border Force through their National Intelligence Analysis Team.

- 5.40 No detection work was being undertaken on the land border given the personal security risks to officers and current severe threat level from terrorism. An attempt to address the threat of illicit commodities crossing the land border had been addressed in the two months prior to the inspection. This was done by the freight team scanning outbound traffic at Larne transiting from Northern Ireland. This had not resulted in any seizures. A joint operation with the Police Service of Northern Ireland (PSNI) at Belfast railway station to target passengers coming from Northern Ireland to a music festival was successful, resulting in seizures of three quantities of class A drugs.
- 5.41 The Agency is part of both the Organised Crime Task Force and the Cross Border Tobacco Enforcement Group. We were informed that a month after our inspection of Belfast, an intelligence officer was scheduled to attend monthly meetings of a new multi agency intelligence sharing group. At the same time the Agency had joined a working group to develop a protocol for defining the responsibilities at the border with HMRC. We consider these moves to be a positive step towards developing the intelligence picture.

Summary

- 5.42 Throughout the inspection, we found that detection officers and managers were committed to identifying and seizing illicit commodities. We found sharing of information on trends at every level, informally among frontline officers and through the dissemination of tactical threat assessments. However the Agency found very little class A drugs over the last 12 months and no seizures from targeted freight in the last 14 months. We considered this to be an area where Border Force needs to evaluate the effectiveness of the intelligence being supplied to ensure that resources in Scotland and Northern Ireland are being deployed effectively.
- 5.43 At the time of the inspection, both the Border Force Control Strategy 2010-11 and the Border Force Business Plan had not been published. The draft control strategy attempts to improve the assessment of the threat and harm to the border. Without a published Border Force Business Plan, there are no objectives in place for officers to work towards. The 2009-10 Control Strategy remained the basis for assessing risks and identifying priorities.
- 5.44 A Northern Ireland business plan was in place despite the absence of the overall Border Force Business Plan. We believe that this could be confusing for officers.

We recommend that the UK Border Agency:

Identifies and addresses intelligence gaps to improve the intelligence picture to better inform the risks to the border.

Publishes business plans and associated control strategies in a timely manner to help inform officers and improve targeting of resources.

General Aviation and General Maritime

- 5.45 In our inspection of General Aviation (GA)¹⁸ and General Maritime (GM)¹⁹ traffic, we considered:
- the extent of risk and threat assessments;
 - immigration clearance; and
 - the identification of illicit commodities.

¹⁸ General aviation (GA) refers to all flights *other than* military and scheduled airline and regular cargo flights, both private and commercial.

¹⁹ Non commercial private vessels

GA flights arrive at commercial airports but also through non-approved ports such as small airfields where there is no routine Border Force presence. GM vessels arrive through harbours, marinas and small inlets. Such ports and seaports are commonly referred to as 'small ports'. We also looked at commercial shipping.

- 5.46 The number of small ports and their geographical dispersal poses a significant resourcing problem for the UK Border Agency. The UK Border Agency assessed there to be 543 small air and seaports in Scotland, and 140 in Northern Ireland²⁰ where people seeking to circumvent passport controls or to bring in illicit goods could enter unchecked. They are covered by teams based in Aberdeen, Belfast, Edinburgh, Glasgow and Prestwick.
- 5.47 Establishing effective controls at small ports has been a consistent risk. In the paper entitled '*Security in a Global Hub*'²¹ the then Government set out a number of recommendations about how work at the border could be improved. This included a specific recommendation relating to small ports which stated: '*The new organisation [the UK Border Agency] should give specific consideration to controls at small ports and airports, working closely with the police.*'
- 5.48 The 2008 HMIC report mentioned in paragraph 5.26 said that '*Consideration should be given to developing a robust risk assessment process that addresses risks along the UK border and which may provide coverage to many locations which currently lack any uniformed presence*'. Given this context, we wanted to see how Border Force had sought to identify and address the risk of, and the threat posed by, illegal movements of people and illicit commodities through small ports in Scotland and Northern Ireland.

Threat assessment

- 5.49 Historically a threat assessment was carried out by Intelligence to look at the threat through a particular port from breaches of immigration. Risk assessment was carried out by operational officers to check that adequate controls were in place to mitigate the threat.
- 5.50 We found no current programme to assess the threat posed through small ports and very few visits by Agency officers. This was despite the Border Force North Business Plan 2009-10 stating they would '*deploy to numerous small ports and seek to meet these risks to the Border*'. Officers voiced concerns that the lack of a current business plan meant that small ports had '*fallen off the radar*'.
- 5.51 Furthermore, we found a lack of clarity in regards to who had responsibility for assessing the threat through small ports.
- 5.52 We found that Border Force's own evaluation²² of their small ports' threat assessments was as follows:
- Northern Ireland recognised this as a weakness and noted a '*lack of clarity on ownership between operations and intelligence. Risk assessments out of date.*'
 - Scotland rated themselves as meeting the required standard commenting '*This is an intelligence activity*'.
 - The Border Force North intelligence assurance return stated '*It is a standing tasking of the BFN Regional Intelligence team that maritime and aviation Threat Assessments are carried out on a rolling basis.*'
- 5.53 These findings were reinforced by a range of managers and officers who told us that no-one knew who was meant to assess the threat, but more importantly that it was not being done. Senior managers confirmed the lack of attention to small ports but said that they had to prioritise resources with the emphasis being on the PCP. As a result of threat assessments not being carried out, subsequent risk assessments are less effective.

²⁰ Figures supplied by the UK Border Agency

²¹ <http://www.statewatch.org/news/2007/nov/uk-border-review-report.pdf>

²² Border Force Standards, self assessment assurance process

- 5.54 We found that only 63 out of 683 threat assessments of small air and seaports had been conducted in the whole of Scotland and Northern Ireland, with none since 2008. Moreover, the threat from illicit commodities was not assessed in 2008 by the UK Border Agency as this predated the combining of detection and immigration officers. We ascertained that threat assessments had been designated as low priority despite GA traffic being identified as an intelligence gap for class A drugs. We consider that the Agency should assess the multiple risks posed through small ports.
- 5.55 We found inconsistencies across the commands in the way that the risk of small ports was being managed. We examined the risk register for each command and found that:
- in Northern Ireland, it had been removed from the risk register in July 2010;
 - in Scotland East, it had been recategorised as an issue despite the original risk being rated high;
 - in Scotland West, it was an active risk.
- 5.56 The relevant intelligence team conducted threat assessments of some of the 469 small ports covered by the areas under inspection as follows:
- Aberdeen: 16 out of 266 small port threat assessments completed;
 - Belfast: 16 out of 140 in Northern Ireland; and
 - Edinburgh: 9 out of 63.²³
- 5.57 Prior to any threat assessments taking place, internet based research was undertaken. Visits were conducted by the intelligence team or with operational colleagues and police officers. Seven threat assessments had been refreshed in early 2009 via interrogation of internal databases, and by phone or e-mail contact with agents or harbour masters. We were concerned at the lack of recent assessment of threat or risk.
- 5.58 We found that very few risk assessments had taken place in 2009-10. Only one risk assessment had been undertaken for the whole of Northern Ireland (of an airfield on 23 March 2009). The assessment clearly identified risks of flights from abroad not being notified to Border Force.
- 5.59 Officers from Edinburgh wrote to the operators of 20 small ports in June 2009 to start a process of risk assessment of immigration issues. Five replies were received but had not been assessed. Prior to integration, detection officers from Edinburgh had performed risk assessments relating to illicit commodities in 2008. In 2009, they visited ten ports over two days to risk assess them with a view to quarterly visits thereafter. We were told that resource and cost implications had precluded this follow-up activity.
- 5.60 Evidence showed that officers at Aberdeen were historically more proactive, maintaining files on 56 of the 266 ports in their geographical area. There had been a programme of visits which they said could not be adhered to because of the emphasis on the PCP and cost. Annual reviews of the immigration risks were undertaken using internal information, telephone contact with ports and the result of any visits. In 2010, they had conducted visits to nine separate ports, 14 in total with some visited more than once.
- 5.61 The Agency has to balance the assessment of threat through small ports against their top priority of maintaining 100% cover on the PCP and seeking to meet indicative illicit commodity targets. Clarity on roles and responsibilities needs to be communicated to regional staff and more should be done to assess the risks. This reinforces our finding of the need to improve the intelligence picture.

²³ Figures taken from information supplied by UK Border Agency

We recommend that the UK Border Agency:

Devises a strategy to address the threat posed to the border by illicit commodities and people through small ports.

Processes for clearing people for immigration purposes

- 5.62 At the time of the inspection, we were told that GA flights nationally were dealt with by the General Aviation Operations Centre (GAvoC) but that the process would be moving to the National Border Targeting Centre. Nationally, details of passengers arriving at non-approved ports are provided in advance by the captain or handling agent to the designated central point to be checked against the Watchlist Index. Scotland and Northern Ireland chose not to use this system in favour of local procedures. Border Force guidance²⁴ stated that local procedures should be applied in that passengers could be cleared remotely.
- 5.63 We found a lack of comprehensive written local procedures in how to deal with this traffic. Belfast had procedures for checking crew lists from commercial vessels but not for flights despite the high number of arrivals, see Figure 2. Belfast’s own assessment of their performance in the assurance process mentioned earlier was ‘not met’ with a note stating ‘work in progress’.
- 5.64 Teams at Edinburgh had limited guidance for dealing with flights and crew lists but did have guidance for agents and harbour masters. Teams at Aberdeen also had written guidance to hand out to agents and harbour masters but none for officers. We acknowledge the views of the Agency that they had small ports teams who knew the procedures but a lack of guidance can lead to a lack of consistency. Nor did this lack of guidance allow for effective planning and business continuity.
- 5.65 Figures are provided below on GA and crew lists. Figures were not available for the small ports covered by Edinburgh.

Figure 2: General Aviation and Crew lists Recorded by Ports with Overall Responsibility for Small Ports in their Area

Belfast	Time Period	01.04.2009 – 31.03.2010
	No. of Flights	237
	Flight Passengers Cleared	792 (684 EEA, 108 Non-EEA)
	No. of Ship Lists Received	885
	No. of Ship Crew & Passengers Cleared	7,078
	Time Period	01.04.2010 – 31.07.10
	No. of Flights	65
	Flight Passengers Cleared	223 (152 EEA, 71 Non-EEA)
	No. of Ship Lists Received	420
Aberdeen	No. of Ship Crew & Passengers Cleared	3,878
	Time Period	01.01.2010 – 23.09.10
	No. of Ship Lists Received	1,102
Edinburgh	No. of Ship Crew & Passengers Cleared	31,340
	Time Period	09.05.2010 – 06.09.10
	No. of Ship Lists Received**	21
	No. of Ship Crew & Passengers Cleared	18,350

*Note – Data for Edinburgh only includes Cruise Liners as no data was available for small ports which fall within the responsibility of Edinburgh

24 Border Force Manual 13.2.1, section 2.1 <http://horizon.gws.gsi.gov.uk/portal/site/horizon-intranet/menuitem.5e9fdfa5b28a104a43757f10466b8a0c/?vgnextoid=f332eaa9ec5c4210VgnVCM1000002bb1a8c0RCRD>

- 5.66 These figures show the amount of traffic was significant. Concerns were raised from a wide range of officers that there were few compliance visits to confirm that details of all arrivals were being supplied and to gather intelligence.

We recommend that the UK Border Agency:

Puts in place local comprehensive written guidance for staff dealing with General Aviation, including compliance visits.

Processes for identifying illicit goods

- 5.67 We saw no evidence of the risks from non-commercial private vessels or GA flights being assessed for illicit commodities, due to the lack of risk assessments as detailed above. Risks from commercial shipping were dealt with by the relevant T & S hub.
- 5.68 The T&S hub identifies commercial shipping targets, including those requiring deep rummage which is a full search of the hold for which specialist training is required. It also provides targets for local detection teams to search accessible areas onboard. Three targets were issued for Edinburgh and Aberdeen local detection teams, with two successes resulting in 49,800 cigarettes being seized. The national deep rummage teams visited Scotland three times in 2010 undertaking 20 operations as detailed in the table below:

Figure 3. Commercial shipping intelligence targets: Scotland 2010

Team	Number of Targets Issued	Number of Rummages	Number Not Rummaged
NDRT & CVRT ²⁵	7	3	4
Scotland West	12	9	3
Scotland East	2	-	2
Scotland North	5	2	3
Cutter	9	6	3
Totals	35	20	15

The rummages resulted in 12 seizures totalling 112,100 cigarettes, two obscene DVD's and two offensive weapons.

- 5.69 Overall, the targeting process is reliant on intelligence and works well with 23% national success rate for commercial shipping. Local detection teams boarding only a small number of ships and failing to engage with harbour masters and other contacts potentially resulted in an intelligence gap. Staff experienced frustration that, despite the limited success in detecting illicit commodities at the major airports, they were unable to be deployed to this alternative source of work.
- 5.70 In Northern Ireland, we saw some coverage of commercial shipping although officers told us of their concern of the threat of illicit commodities coming via shipping at ports other than Belfast. Whilst targets from the T&S hub address these threats, there were no targets in Northern Ireland for the deep rummage teams in 2010. Twenty targets were issued to local detection teams: five were rummaged, six were not, and no feedback was given to the T&S hub on the action taken for the remaining nine.
- 5.71 At the time of the inspection, we noted that of the 32 ships boarded by the freight team, only two were in locations other than Belfast despite the last significant seizure of cigarettes being at Warren Point (outside of Belfast). A seizure of 250,000 cigarettes was made from a ship at Belfast when the harbour police saw a suspicious vehicle on CCTV. This showed that cigarettes were coming through on commercial shipping but no intelligence to this effect had been received.

²⁵ NDRT is the deep rummage training team and CVRT is the training team

- 5.72 This reinforced our view of a lack of a comprehensive intelligence picture and adds weight to our earlier recommendation to improve the intelligence picture to better inform the risks to the border. Moreover feedback mechanisms were not functioning as they should. We noted earlier that the freight targeting team only received feedback from positive hits.

We recommend that the UK Border Agency:

Ensures that frontline staff provide feedback and that it is used to inform the targeting process

There is effective joint working with external and internal delivery partners, stakeholders including enforcement and security agencies; in particular the links between Border Force and the Immigration Group

Stakeholders: Police

- 5.73 There was some evidence of good working relationships with the police, PSNI in Northern Ireland and Special Branch (SB) teams in Scotland. We have commented previously on the successful operation at Belfast railway station run jointly with PSNI and the seizure of a considerable number of cigarettes at Belfast International Airport following intelligence received from the police.
- 5.74 Grampian Police SB at Aberdeen reported good working relationships with Border Force, citing joint local intelligence meetings and informal contact through co-located offices as helping to build that relationship. They also acted as a conduit to pass information from Grampian Police with responsibility for the seaports and small ports. Teams at Aberdeen confirmed that Grampian Police SB officers enhanced their capability in remote locations where they had part-time officers. However we saw no evidence of joint risk assessments.
- 5.75 We saw some evidence of joint working with Lothian and Borders SB at Edinburgh where they had done a joint ship boarding exercise in March, covering five vessels in four days. This was done in conjunction with SB and Fife police as a compliance check of manifests against crew. Detection officers also formed part of the team. The ships were profiled from the route, crew, previous revenue history and cargo. There were no seizures but we were told that the Agency was hoping to use the exercise to build relationships leading to joint risk assessments.
- 5.76 Lothian and Borders Special Branch, based at Edinburgh, have a small ports unit. Over the last two years they had risk assessed every port/harbour from a counter terrorism perspective. This work was part of a national police initiative to map every UK port from a policing and counter terrorism angle.
- 5.77 Every month they visited those ports they had assessed as being high risk. Although the Agency reported good working relationships with SB at Edinburgh, there was little evidence at the time of the inspection of joint risk assessments or of information sharing. SB confirmed that they were willing to share information and undertake joint risk assessments. We considered that much more could be done locally and nationally to work with the police to share resources and information to meet the multiple threats to the UK border.

We recommend that the UK Border Agency:

Initiates a multi agency approach to risk assessing small ports, working with the police, port operators and any other relevant organisations.

Other stakeholders

- 5.78 Despite the reduced operational engagement between frontline officers and contacts at small ports as described above, there was evidence of good working relationships with port operators at a strategic level.

- 5.79 Port operators in all three locations commented on improvements in their engagement with the Agency, with particular praise for the management teams. Edinburgh Airport reported that issues around the throughput of passengers had improved through effective liaison. Monthly arrival times of flights were supplied to the Agency, broken down into 15 minute slots, to allow them to plan officer deployment to the PCP more effectively. An effective queue management system using CCTV had been implemented.
- 5.80 A potential security issue had been identified and addressed by the UK Border Agency at Edinburgh Airport. International passengers passed through a secure corridor adjacent to the Common User Lounge from which there was access without having to pass through passport control. There had been seven security breaches in the last three years, into but not out of the lounge, enabling arriving passengers to exit the airport without passing through immigration control. The Agency had managed the situation, ensuring the Airport Authority mitigated against future occurrence through improved door security, officer training and CCTV coverage. It remains under review. In contrast, a similarly significant security issue identified during our inspection at Manchester Airport was not remedied until drawn to the attention of the Agency's Chief Executive during our inspection.
- 5.81 Port operators in Northern Ireland had formal agreements in place with the Agency and hold regular meetings. Larne Port Operator praised the Agency for being open to moving detection operations to allow them to conduct searches and minimise the impact on other passengers. Larne and the City of Derry Airport commented on the strong three-way relationship with the Agency and PSNI (Police Service of Northern Ireland). Belfast Harbour praised the effective planning by Border Force to ensure clearance was given to ships/crew to ensure the smooth running of the Tall Ships Festival.
- 5.82 The Scottish Government gave extremely positive feedback, praising Border Force senior managers for putting in place and maintaining very good working relationships.

Integration

- 5.83 Two of the port operators commented that the 'integration' of legacy detection and immigration was not clear from an external viewpoint. They said there were two points of contact and that each sent a representative to meetings. This was particularly obvious on the airport focussed Multi-Agency Threat and Risk Assessment (MATRA) group which has a representative from each control authority (such as the airport, the Agency, Police, Serious Organised Crime Agency etc.) This group has no connection with the risk assessment of small ports.
- 5.84 This lack of integration was supported by evidence from interviews, focus groups and from observations. We considered that this had the potential to impact on the efficiency and effectiveness of the Agency. However the imminent move of detection officers from an off-site office to Belfast International Airport and the planned move to joint teams at Edinburgh should improve integrated operations.
- 5.85 In our inspection of Manchester Airport, we noted that far fewer legacy immigration officers were trained to work in the secondary examination area compared to detection officers trained on the PCP. Detection officers can work on the PCP with 'Pre IS81' training while legacy immigration officers require SEAT²⁶ training to work in the secondary examination area. A similar trend was found in Belfast, Aberdeen and Edinburgh where, across the three locations, almost 100% of relevant detection staff were trained on PCP duties, but only 9% of PCP staff had received SEAT training. Figure 4 below gives details:

²⁶ Secondary examination area training

Figure 4: Integration Training by Port and Role
Detection Officers trained for Immigration role

Port	No. of Legacy Detection Officers*	Pre IS81	%
Belfast	44 ²⁷	44	100
Aberdeen	13	13	100
Edinburgh	20	19	95

Port	No. of Legacy Immigration Officer*	SEAT	%
Belfast	20	2	10
Aberdeen	14	0	0
Edinburgh	32	4	12

*Includes Higher Officer (HO) and Chief Immigration Officer (CIO) Grades

- 5.86 We noted, however, that two legacy immigration officers at Edinburgh had been working as detection officers for two years. A further two officers at Belfast, three at Aberdeen and six at Edinburgh were either being trained or scheduled for SEAT training.
- 5.87 As well as limited integration within Border Force, we observed little liaison between Border Force and Immigration Group who deal with enforcement work. As reported in our inspection of the Common Travel Area, detection officers working at Belfast City Airport and enforcement officers undertaking an operation at the same airport had not been involved in joint planning to mitigate the impact on the public. This resulted in people being questioned by two different parts of the Agency. We were advised that recent liaison had begun between Border Force and Immigration Group to discuss enforcement work at the docks. For the moment, however, we noted that UK Border Agency appeared disjointed both to us and to stakeholders.

²⁷ Figures taken from organograms and training records supplied by UKBA

6. Inspection Findings – Processes and procedures, consistency of approach and impact on people subject to UK Border Agency services

Objective criteria based on evidence are applied consistently and transparently, without unjustified/unauthorised adverse impact on any nationality/ethnic group

- 6.1 There was no evidence of unfair treatment during our observations of people being stopped for search by detection officers. However this was based on limited observations of interactions with primarily European Economic Area (EEA) nationals. Officers were able to explain the reasons for stopping each person stopped during our observations at Aberdeen, Belfast and Edinburgh. They explained the indicators they use to make their selections in the absence of intelligence or targets.
- 6.2 Every time a person was stopped, officers were required to record this in their notebooks, including the reasons for the selection and the appropriate legislative grounds. This should be done irrespective of the result of the search. This was overseen by manager observations of the work and assurance checks on notebooks. This is an issue we commented on in our inspections of Manchester Airport and Intelligence and will be subject of a full examination as part of our inspections of ports in 2011-12.
- 6.3 Border Force self assesses their performance against a set of standards for each part of their work. Northern Ireland had assessed themselves as not fully having the appropriate controls in place in October 2010. This was because checks were made regularly but not daily. Scotland had self assessed as doing daily assurance checks on notebooks.
- 6.4 The Targeting Manual gave clear guidance on the procedures to be followed to provide alerts identifying which passengers should be stopped. They were based on scrutinising inbound passenger manifests using profiles. Routing, ticketing, known travel agent, connecting flights and unusual booking patterns were all considered. A number of databases would also be checked for previous seizures or any adverse information.

UK Border Agency officers are professional, courteous and respectful when dealing with customers, irrespective of their status

- 6.5 Through our observations we saw officers treat passengers with courtesy. At Aberdeen in particular, we saw officers interacting well with people they had stopped whose command of English was limited. Officers used language cards covering questions and explanations connected with detection, translated into the most common languages encountered. This initiative appeared to improve communication but we had some concerns that the telephone interpreting service was not available to officers. This is an area we will look at in future port inspections.
- 6.6 Airport authorities reported that they received verbal and written complaints direct from the public. Over the past 12 months, very few complaints had been received about the Agency's officers but the exact number had not been recorded. All the port operators said that the Agency's officers scored well in the independent airport customer survey conducted by Airport Service Quality²⁸. One of the measures was courtesy and helpfulness of officers on the PCP. For the quarter ending September 2010, all three of the ports scored just above or below four. The rating was on a scale of excellent (5) to poor (1).

²⁸ <http://www.airportservicequality.aero/content/performance/using.html>

6.7 We looked at the number of written complaints for all Border Force officers in the three areas under inspection over 2009 and 2010:

Figure 5: Written complaints

Airport	Year	Delays / Admin Process unsubstantiated (substantiated)	Rudeness unsubstantiated (substantiated)
Aberdeen	2009	2	1
	to July 2010	0	0
Edinburgh	2009	24	1
	to July 2010	7 (2)	3
Belfast	2009	4	8
	to July 2010	5	4 (1)

- 6.8 The number of written complaints in the three airports inspected was 39 in 2009 and 19 in the period to July 2010. Only 7 complaints in 2010 were for unprofessional behaviour: one was substantiated. The small number of complaints received relative to the number of passengers passing through the ports supports our observations that officers were professional in their dealings with the public.
- 6.9 However, in all three locations officers said they received frequent verbal complaints. The incident log record records five verbal complaints from 1 April to 30 September 2010 at Aberdeen, and four at Edinburgh Airport during the same period. Managers told us that the majority of verbal complaints were about having illicit commodities, such as cigarettes, seized rather than complaints about officers' behaviour. However the failure to log all complaints meant that this could not be corroborated. Managers acknowledged that some complaints were related to stops because of ethnic origin. They attempted to resolve all verbal complaints onsite, including those alleging unfair treatment due to ethnic origin and provided leaflets on how to make written complaints. We did not observe any verbal complaints being made.
- 6.10 Failing to log all verbal complaints and report them to the Border Force Customer Service Unit is contrary to UK Border Agency guidance on complaint handling. The guidance states that *'any expression of dissatisfaction'* should be recorded. This was not being done which meant there was no record of the number or type of complaints being received. Ambiguity over the process to be followed on verbal complaints was also found in our thematic inspection on the UK Border Agency's handling of complaints and in our inspection of the Agency's Loughborough Reporting Centre.²⁹

²⁹ Handling of complaints inspection report: http://icinspector.independent.gov.uk/wp-content/uploads/2010/07/Lessons-to-learn_The-UK-Border-Agencys-handling-of-complaints-and-MPs-correspondence.pdf
Loughborough reporting centre inspection report: <http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Loughborough-Unannounced-Inspection-Report2.pdf>

Appendix 1

Inspection Framework and Core Criteria

The criteria used in this inspection were taken from the Independent Chief Inspector's Core Inspection Criteria. They are shown below.

Section 1 – High level outcomes of the business

1.1 General Criterion: The borders are secured and immigration is controlled for the benefit of the country. The specific criteria are shown in Figure 1.

Figure 1 – Specific criteria:

- 1.1(b) Operational policies, priorities and deployment of staff is driven by clear analysis of environment, risks, threats, capabilities and impact (tailored criterion)
- 1.1(c) There is effective joint working with delivery partners and stakeholders including enforcement and security agencies; carriers; local authorities; employers and educational establishments

Section 2 – Processes and procedures including quality of decision making and consistency of approach

2.1 General Criterion: UK Border Agency is compliant with equalities legislation and specific duties in relation to race and diversity. The specific criterion is shown in Figure 2.

Figure 2 – Specific criterion:

- 2.1(c) Objective criteria based on evidence are applied consistently and transparently, without unjustified/unauthorised adverse impact on any nationality/ethnic group

Section 3 – Impact on people subject to UK Border Agency services

3.1 General Criterion: UK Border Agency staff and staff of commercial partners are welcoming and engage positively with customers and other users. The specific criterion is shown in Figure 3.

Figure 3 – Specific criterion:

- 3.1(b) UK Border Agency staff are professional, courteous and respectful when dealing with customers, irrespective of their status

Appendix 2

List of stakeholders

During the inspection, we contacted and consulted with a wide variety of stakeholders who are listed below.

- Aberdeen Harbour
- Belfast City Airport
- Belfast International Airport
- Belfast Port
- British Airports Authority
- British Air Transport Association
- Clyde Port Authority
- City of Derry Airport Manager
- Londonderry Port Authority
- Forth Port Authority
- Immigration Service Union
- Larne Harbour
- Members of Parliament for Scotland
- Members of the Northern Ireland Legislative Assembly
- Public and Commercial Services Union
- Police Service of Northern Ireland
- Scottish Executive
- Serious Organised Crime Agency
- Warrenpoint Harbour Authority

Appendix 3

Glossary

Term	Description
A	
Agency	Refers to the UK Border Agency
Assistant Director	Equivalent to Grade 7, see below
Audit trail	Chronological list of events
B	
Biometrics	All customers are now routinely required to provide ten-digit finger scans and a digital photograph when applying for a United Kingdom visa. There are some minor exceptions to this rule, e.g. Heads of State and children under five.
Border Force	Part of the UK Border Agency, responsible for frontline operations at air, sea and rail ports.
Border Force Control Strategy	Provides a framework to assess and prioritise risk to assist in decision making processes and resource allocation.
Border and Immigration Agency (BIA)	The name of the agency responsible for immigration functions prior to creation of the UK Border Agency.
C	
Casework Information Database (CID)	The Case Information Database is an administrative tool, used by the Agency to perform asylum tasks including recording all applications for asylum, with the related casework and decisions.
Chief Executive Officer	Senior Civil Servant at the head of the UK Border Agency.
Commodities	Drugs, cigarettes, money.
Common Travel Area (CTA)	Allows free movement between Britain, Ireland, the Isle of Man and the Channel Islands, subject to conditions set out in the Immigration Act 1971.
Complaint	Defined by the UK Border Agency as ‘any expression of dissatisfaction about the services provided by or for the UK Border Agency and/or about the professional conduct of UK Border Agency staff including contractors’.
Complaints management guidance	The formal UK Border Agency guidance for the management and handling of complaints

Customer	Defined by the UK Border Agency as anyone who uses the services of the Agency, including people seeking to enter the United Kingdom, people in detention and MPs.
Customer Hosts	Staff employed by the airport to greet passengers as they enter the arrivals hall of the airport, offering general assistance where necessary
D	
Detection	A function carried out by Border Force staff in the customs area (to detect the illicit trade or importation of illegal goods).
Director	Senior UK Border Agency manager, typically responsible for a directorate, region or operational business area.
E	
e-Borders	A multi-agency programme being delivered by the UK Border Agency in partnership with the police and the security and intelligence agencies. It focuses on the capture and analysis of passenger and crew data from carriers, in advance of movements into and out of the UK by air, sea and rail.
European Economic Area (EEA)	<p>The European Economic Area (EEA) was established on 1 January 1994 following an agreement between the member states of the European Free Trade Association (EFTA) and the European Community, later the European Union (EU).</p> <p>All EEA nationals enjoy free movement rights in the EEA. This means that they are not subject to the Immigration Rules and may come to the United Kingdom and reside here in accordance with the 2006 Regulations. They do not require permission from the UK Border Agency to enter or remain, nor do they require a document confirming their free movement status.</p>
Executive Officer	Lower management grade. Equivalent grades exist in the UK Border Agency, including Officer and Immigration officer.
F	
Facial Recognition System	Border security technology which scans each passenger's face against the digital photo recorded in their passport. If there is a match, the automatic gates allow the clearance of EU passengers across the border.
G	
General Aviation	General aviation (GA) refers to all flights other than military and scheduled airline and regular cargo flights, both private and commercial.
General Maritime	Non-commercial private craft
Grade 7	Senior manager, subordinate to Grade 6, superior to a Senior Executive Officer.
H	
Her Majesty's Inspector of Immigration (HMI)	The UK Border Agency senior manager primarily responsible for legacy immigration staff.
Her Majesty's Revenue and Customs (HMRC)	HMRC Detection operated at air, sea and rail ports. It was one of the legacy organisations that made up the UK Border Agency.

Higher Executive Officer (HEO)	A management grade. Equivalent grades exist within the UK Border Agency, including Higher Officer and Chief Immigration Officer.
Home Office	The Home Office is the lead government department for immigration and passports, drugs policy, crime, counter-terrorism and police.
I	
Immigration Group	The directorate within the UK Border Agency responsible for asylum, enforcement, compliance and nationality.
Independent Chief Inspector of the UK Border Agency	The role of the Independent Chief Inspector of the UK Border Agency was established by the UK Borders Act 2007 to examine the efficiency and effectiveness of the UK Border Agency. The Chief Inspector is independent of the UK Border Agency and reports directly to the Home Secretary.
Intelnet	UK Border Agency database providing up-to-date information by product on intelligence, threat assessments, recent seizures, trend alerts and more.
Integration	The term used to describe the process of integrating immigration and customs functions within the UK Border Agency.
International Group	The overseas arm of the UK Border Agency, responsible for running visa operations in 135 countries. Formerly known as UK Visas.
L	
Legacy customs functions	Term used to describe the customs detection functions undertaken by the UK Border Agency since integration.
Legacy immigration functions	Term used to describe the immigration functions undertaken by the UK Border Agency since integration.
Legacy organisations	The three organisations that formed the UK Border Agency: the Border and Immigration Agency, UK Visas and HMRC Detection.
M	
Member of Parliament (MP)	Elected representative in the United Kingdom and key customer of the UK Border Agency.
Minister	The Minister of State for Borders and Immigration is a member of Her Majesty's Government with responsibility for matters relating to immigration.
N	
National Border Targeting Centre (NBTC)	A central hub staffed by the UK Border Agency and the Police, undertaking operational activities integral to the e-Borders programme
Non-Approved Ports, also known as non-designated ports	Non-Approved Ports is the name given to small air and sea ports that are not generally staffed by Border Force and are covered by larger ports.

Non-visa nationals	A national or citizen of any country that is not listed on the UK Border Agency website (Appendix 1 of the Immigration Rules). A non-visa national does not need a visa to come to the United Kingdom for less than six months, unless it is a requirement of the immigration category under which they are entering. A non-visa national coming to the United Kingdom for more than six months will need a visa.
P	
Performance Development Review (PDR)	An appraisal system for monitoring staff performance.
POISE	The IT system/platform used by Immigration Group.
Police Referral Programme	A joint programme with the host police force to take action against visa applicants who submit forged documents or fraudulent travel or supporting documents.
Primary Checkpoint	An initial border control point combining both customs and immigration functions.
R	
Race Relations Act 1976	An Act of Parliament established to prevent discrimination on the grounds of race.
(The) Region	Scotland and Northern Ireland.
Regional Director	Senior manager responsible for one of the six Immigration Group regions.
Regionalisation	The creation of six UK Border Agency immigration regions.
Removal	The process by which a person or person(s) voluntarily, through assistance or through enforcement by UK Border Agency staff, physically leaves the UK after a failed asylum application.
Risk Profile	A profile developed through the use of compliance exercises to identify areas of risk.
S	
Secondary Examination Area (SEA)	An area where UK Border Agency officials may be involved in the questioning of passengers and searching of baggage, freight and vehicles.
Senior Customs Officer (SO)	The UK Border Agency senior manager primarily responsible for legacy customs staff.
Senior Executive Officer	A management grade, subordinate to Grade 7. Equivalent grades exist within the UK Border Agency, including Senior Officer and Her Majesty's Inspector.
Serious Organised Crime Agency (SOCA)	An Executive Non-Departmental Public Body of the Home Office responsible for pro-active operations against serious and organised crime.
Service complaint	Category of complaint concerning the way that the UK Border Agency works, for example delays, lost documents or administrative failings. These complaints are both about the actual service provided and the operational policies that the Agency operates.

Strategic Threat Assessment (STA)	A document which describes and assesses the threats to the UK border from irregular migration, organised crime, terrorism and smuggling and considers how these threats might develop.
Substantiated	Used to describe a complaint that has been upheld, may also be partially substantiated.
T	
Targeting and selection (T&S) hub	A central hub where staff scrutinise flight manifests to identify those whose routing or other indicators suggest that an individual/s may be importing illicit goods.
Tasking and coordination group (TCG)	A system to prioritise threats, set objectives and plan resources and action at all levels of the organisation. In essence a business process supported by intelligence.
U	
UK Visas	Ran visa operations at overseas locations. One of the legacy organisations that made up the UK Border Agency and is now known as International Group.
United Kingdom and Islands	The United Kingdom is made up of England, Scotland, Wales and Northern Ireland. The Channel Islands and the Isle of Man are not part of the United Kingdom. The geographical term ‘British Isles’ covers the United Kingdom, all of Ireland, the Channel Islands and the Isle of Man.
United Kingdom Border Agency	The agency of the Home Office responsible for border control, enforcing immigration and customs regulations. It also considers applications for permission to enter and stay in the UK, including nationality and asylum applications.
V	
Visa Nationals	<p>Visa nationals are those who require a visa for every entry to the United Kingdom. A visa national is a national of a country listed on the UK Border Agency website (Appendix 1 of the Immigration Rules). Some visa nationals may pass through the United Kingdom on the way to another country without a visa, but in some circumstances they will require a direct airside visa or visitor in transit visa. Visa nationals must obtain entry clearance before travelling to the United Kingdom unless they are:</p> <ul style="list-style-type: none"> • returning residents; • those who have been given permission to stay in the United Kingdom and, after temporarily leaving the United Kingdom, return within the duration of that permission to stay; • school children resident in a European Union member state who are on an organised school trip from a general education school and accompanied by a teacher.
W	
Watchlist Index	A database of names available to the UK Border Agency of those with previous immigration history, those of interest to detection staff, police or matters of national security.

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