



Home Office

The Home Office response to the Independent Chief Inspector of Border and Immigration's report:

An inspection of Exit Checks

August 2017 – December 2017

The Home Office thanks the Independent Chief Inspector of Borders and Immigration (ICIBI) for his report and is grateful to the ICIBI for highlighting potential areas for improvement.

Whilst the Home Office does not accept the overall recommendation that the exit checks programme governance structure be re-established, work is already underway, under alternative governance structures that have already been established to continue to address the substantive issues that have been raised by the ICIBI. Our response highlights the work already underway and the Department's future plans.

The ICIBI has made one recommendation:

1. *That the Home Office should re-establish the Exit Checks Programme, with appropriate Programme oversight, governance and documentation ensuring that:*
 - a. *the Home Office's 'vision' for exit checks is refreshed and restated.*
 - b. *the Home Office Departmental Board has sufficient visibility of this 'business critical' enabler of the Border, Immigration and Citizenship System, and receives regular Programme updates.*
 - c. *the (new) Programme Board has the authority and horsepower to drive the improvements needed in data quality and the closure of the data collection gaps, including:*
 - i. *regular senior level liaison with carriers and travel industry associations to reinforce the value of travel data for immigration, law enforcement and security purposes, and the importance of their continued support in improving data quality*
 - ii. *improved travel data collection for inbound sea ferries*
 - iii. *collection of travel data for inbound international rail routes*
 - iv. *effective 'alternative arrangements' for inbound and outbound travel data collection for routes via the Common Travel Area (CTA), and for General Aviation and General Maritime*
 - v. *greater data sharing and matching with other government departments and agencies*
 - d. *The (new) Programme Board is accountable (to the Home Office Executive Committee) for ensuring that the department's receipt, storage, processing and use (including data sharing) of travel and related data is compliant with the Data Protection Act 1998, and that the UK's current and future data requirements are fully reflected in relevant new legislation and in the negotiations for the UK's exit from the European Union*
 - e. *All Home Office Projects and other work ("operational" trials and pilots) in support of the Programme are properly prioritised, resourced and co-ordinated, with clearly articulated deliverables and timescales, and include:*

i. reducing (through further analysis of ISA data) the “unmatched pot” of visa nationals for whom there is a record of exit but not of entry

ii. the extension of ISA data analysis to visa nationals holding long-term (2, 5 and 10-year) visit visas and non-visa nationals with no record of departure

f. Plans for the replacement of Semaphore are revisited and firmed up (with the user requirement updated and with published delivery dates) and, pending its replacement, maintenance and support for Semaphore is prioritised, with issues about access quickly resolved and with some form of assurance (in lieu of an audit function) that its use is controlled.

The Home Office response: Not accepted

The Exit Checks Programme closed in May 2016 having delivered its objectives. It was an implementation programme and outbound travel data which was previously not acquired is now processed routinely in line with the scope determined by the Programme. The data matching system and analytical capability built by the Programme, the Initial Status Analysis (ISA), remains in place and is delivering results.

As a result of the Exit Checks Programme, significant operational gains, and major policy and statistical benefits have already been realised. The increased extent of outbound travel data processed as a direct consequence of the programme is supporting national security objectives by providing the police and the security services greater insight into the outbound movements of suspected criminals and terrorism-related subjects of interest. The matching of outbound travel movements with arrivals data and immigration records in the ISA is providing a new understanding of compliance with the immigration system and is being used for a range of immigration-related operational purposes.

While the Home Office agrees that some of the underlying issues with the processing of Exit Checks data are inhibiting full realisation of all potential operational benefits at this point in time, the Department believes that functional improvements in this area can be achieved through governance arrangements other than re-establishing the Exit Checks programme.

Reflecting the sentiment of the points made by the ICIBI at A- D, the Home Office has already initiated a cross-departmental **Border Movements Data Programme** covering the *acquisition and exploitation of data about the movement of people and freight into and from the UK* which addresses the operational and analytical requirements of the Department, the wider Home Office family, other Government Departments and the Office for National Statistics. This was established in November 2017.

This cross-departmental approach reflects that the same data, whether about the movement of people or freight, serves a wide range of requirements: national security, counter-terrorism, serious organised crime, volume crime, immigration, customs, public health and safety requirements, statistical and regulatory functions.

The new Border Movements Data programme has two core strands:

- **Acquisition of data** – including generation of data, data quality, gaps in coverage (for example advance rail and maritime data, Common Travel Area data, fast parcel data) and engagement with data holders, and
- **Exploitation of data** – ensuring that processing of data is optimal, delivering effective operational and analytical outcomes and providing feedback to the data acquisition process.

The Border Movements Data Programme will ensure that there is:

- more clarity about the Department's ambition and strategic aims, aligned with data protection and human rights legislation;
- clearly prioritised data acquisition requirements – leading to better coordination of engagement with data providers and closing of significant data gaps;
- clearly defined and measurable requirements for data quality assessment;
- better assessment of the merits of short-term tactical solutions against long-term strategic solutions;
- more balanced consideration of the data requirements for operational decision-making with the data requirements for analysis, analytics and insights which are needed to inform policy decisions, policy evaluation and to run the Department, and
- better alignment of border movements data policy, with operational and analytical requirements and with technical programmes that are sufficiently agile to adapt to changing requirements.

Traditionally the Department's approach to data has – to a degree – been to acquire data first, usually for a specific purpose, and then to work out how accurate it is and how to exploit it better. The Exit Checks Programme was an example of good collaboration to deliver against the specific requirements of the programme. We will build on the experience of the Exit Checks Programme to develop an approach that meets not only that programme's requirements and the issues identified by the ICIBI in its report, but wider border security requirements as well. This is a reflection that understanding, assessing and exploiting exit checks data is part of a wider data system, not an isolated component, and the Border Movements Data Programme approach reflects that bigger context.

The Border Movements Data Programme will:

- Introduce a cross-departmental approach and more discipline about priorities and coordination of border movement data activity across the department and wider government;
- Coordinate the activities of those engaged in acquiring data;

- Coordinate the activities of those engaged in exploiting data – the most significant step-change in recent time has been increasing requirements for exploiting data. The next step must be to improve data quality, focussing on our requirements for timeliness and accuracy of data.
- Reduce the risk of intelligence failure from not making effective use of data – more effective management of border movement data across the Department will reduce any risk that the use of data is not being optimised. Improved assurance of the quality and integrity of data will mean that risk can better be assessed and targeted.

In response to the substantive point E, an established Exit Checks - Senior User Steering Group is already in place to oversee exploitation of the ISA which brings together relevant operational and policy directors from across the Department. This group, which operates at the strategic level, is charged with overseeing how ISA data is being used and ensuring that all operational benefits are maximised.

Under this Senior User Group, the Data Analysis Gateway Board brings together those responsible for maintaining and developing the ISA system, operational users of ISA data and policy and strategy leads from the business areas for more detailed work.

The Gateway Board:

- Reports to the Senior User Steering Group that provides strategic direction;
- Facilitates and coordinates ISA data access and use across the business;
- Promotes operational use of the ISA data and collects feedback from users to drive further development of the ISA system; and
- Oversees and prioritises a programme of analytical work to improve the quality of the data ingested into ISA and gain analytical insights from it.

The Gateway Board oversaw the successful implementation, on 15 January 2018, of “leave instance”. Leave instance is a major technical improvement to the ISA system, which increases the operational and analytical uses for ISA data. Work is already underway to start to exploit this new functionality, allowing the Department to extend operational use of ISA data to new cohorts such as those on Long Term Visit Visas and providing new insight into the behaviour of immigrants to inform policy development.

In response to the substantive point F, the Advance Border Control (ABC) project within the Digital Services at the Border (DSAB) programme aims to deliver an improved replacement service for Semaphore that is resilient, performant, cost effective and enables new capabilities supporting the digital passenger flow through our borders. It will be a flexible system that supports a low cost of change enabling operators to respond to emerging and changing threats quickly.

The scope of ABC for the period to March 2019 is to replace the existing capabilities of Semaphore. This means that whilst ABC will develop a new interface (called Strategic Data Messaging (SDM)) for carriers and other transport mode equivalents to provide passenger data, standardisation of data provision or the implementation of further mandatory data quality standards and barriers will not be implemented at this time. This is

to minimise the impact of changes to carriers so as to reduce the risk of the Semaphore to ABC carrier transition period running over an unacceptably long-time period.

The SDM service will continue to accept data directly from commercial air, sea and rail carriers as well as other feeds such as the Collaborative Business Portal and others to support the submission of lower volume data sources such as General Aviation and Maritime.

Meanwhile, the Border Systems Technology Projects (BSTP) team is responsible for the management and necessary enhancement of Semaphore ahead of ABC. BSTP has a continuing programme of work to address technical obsolescence, faults and new enhancements to Semaphore to maintain current operational integrity. Consideration is currently being given to user access to implement system changes, supported by manual process, to address requirements arising from the transpositions of the EU Directive on use of Passenger Name Record data - the EU General Data Protection Regulation.

A transition plan between Semaphore and ABC is under development which will look to balance costs and benefits, business change impacts, mitigation of delivery risks, and time frames. ABC services will be available for transition, pending business change capacity, from October 2018 onwards. Services will continue to be developed and available for transition until March 2019. Semaphore will remain available throughout 2019 to support resilience and business change activity.

