



**THE UK BORDER AGENCY RESPONSE TO  
THE INDEPENDENT CHIEF INSPECTOR'S REPORT  
ON BORDER OPERATIONS IN SCOTLAND AND  
NORTHERN IRELAND**

The UK Border Agency thanks the Independent Chief Inspector (ICI) for advance sight of his report, and we value the opportunity the report presents for us to consider our border operations and how we might improve them.

We are pleased the report notes the significant progress that we have made to border operations in bringing together immigration and customs operations. This major change has allowed the UK Border Agency to create a more flexible workforce that is better able to deal with the risks to the UK Border. As the report recognises, a single agency approach has also allowed a strong, mutually beneficial working relationship with our strategic stakeholders.

The report makes seven recommendations to assist us as we continue to improve our border operations. The Agency welcomes these recommendations to further improve the efficiency and effectiveness of our operations. Our organisation has continued to change and improve since the time of the inspection and we have already made progress in addressing most of the concerns raised in those recommendations. Of course, more needs to be done; border controls face continuing and evolving threats that require a flexible and changing response.

The UK Border Agency response to the recommendations:

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

- 1.1 The UK Border Agency accepts this recommendation in part.
- 1.2 The ICI recognises, in his report, that increased capability to detect the potential importation of illicit commodities has been achieved and that training to enhance detection capability at ports continues.
- 1.3 Further progress has been made since the time of the inspection and plans are in place at all ports to ensure that the Agency is able to maximise this additional capability.
- 1.4 The move to integrated team working and changes to the terms and conditions of our staff have given additional operational flexibility and enabled us to further refine deployment and ensure that we are increasingly effective in deploying between risk and demand.

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

- 2.1 The UK Border Agency accepts this recommendation.
- 2.2 The ICI recognised that there was activity in Scotland and Northern Ireland which assisted in developing the intelligence picture but concluded that there appeared to be an intelligence gap in container traffic and was concerned about the effectiveness of the intelligence being supplied in relation to Class A drugs.
- 2.3 Identifying and addressing intelligence gaps is integral to every area of law enforcement. The UK Border Agency routinely make significant seizures of a range of commodities in container traffic through intelligence and targeting and the same processes have supported the interdiction of significant quantities of Class A drugs nationally including upstream disruption of consignments destined for Scotland and Northern Ireland.

2.4 The UK Border Agency has made significant progress in restructuring its intelligence and targeting operations and continually reviews the performance of these functions in order to identify and address potential gaps. The Border Force Intelligence Requirement document serves to identify gaps in the intelligence picture across all thematic areas and is used in conjunction with the Border Force Control Strategy to prioritise intelligence gathering activity. Both documents were approved for use by the Border Force Strategic Tasking and Coordination Group in January 2011. The intelligence requirements are reassessed and rewritten annually. The Control Strategy is refreshed every six months. Both are produced in consultation with UK Border Agency delivery partners including HM Revenue and Customs and the Serious Organised Crime Agency.

2.5 As part of its programme of restructuring intelligence and targeting capability, and of continuous improvement, the UK Border Agency will review the effectiveness of intelligence and targeting support to freight operations and Class A interdiction in Scotland and Northern Ireland and assess the completeness of the intelligence picture, addressing any gaps identified.

**3. Ensures that plans and associated control strategies are published in a timely manner to inform staff and allow more effective targeting of resources.**

3.1 The UK Border Agency accepts this recommendation.

3.2 The Border Force Control Strategy was published to intelligence staff and regional Tasking and Coordination Groups in January 2011 and published to all staff on 7 April 2011.

3.3 The UK Border Agency Business Plan was published on 13 May 2011 and the Border Force Business Plan will be published in due course.

3.4 The Border Force North Business Plan will be published immediately thereafter.

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

4.1 The UK Border Agency accepts this recommendation.

4.2 The threat at small ports is included, where relevant in national alerts and in monthly tactical assessments. Focused operational effort on specific people and commodity threats at small ports takes place through national and regional Tasking and Coordination Groups.

4.3 The UK Border Agency has an Active Enhancement Programme with strategic policing partners. The Active Enhancement Programme has specific work streams on joint risk and threat assessment and joint communications which cover non approved ports. Work to develop a Common Risk Assessment tool for non approved ports is also in progress.

4.4 The UK Border Agency are considering options for a national programme of structured risk testing in order to further assess and address the threats posed at all ports.

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

- 5.1 The UK Border Agency accepts this recommendation in part.
- 5.2 The UK Border Agency has recently revised its strategy in relation to dealing with General Aviation and General Maritime and is in the process of implementing it. A revised GAR form and centralised submission process is being taken forwards, as is a standard national risk assessment process for all GA flights, and a new target to meet 100% of all high risk flights. Work is also being taken forwards in relation to General Maritime. Managers in Scotland and Northern Ireland are in active discussion with those managing this implementation in order to assess whether this meets the specific requirements for non-scheduled services arriving into ports in Scotland and Northern Ireland.
- 5.3 Once that assessment has been concluded, any ports not fully covered by the national process will have approved comprehensive guidance implemented.
- 6. Ensures that frontline staff provide feedback and that it is used to inform the targeting process.**
- 6.1 The UK Border Agency accepts this recommendation in part.
- 6.2 There is already a feedback process in place. That is recognised by the ICI at paragraph 5.19 of his report.
- 6.3 The UK Border Agency will review compliance with this feedback process and, if necessary, ensure that there is proper focus on the process.
- 7. Initiates a multi agency approach to risk assessing small ports, working with the Police, port operators and any other relevant organisations.**
- 7.1 The UK Border Agency accepts this recommendation.
- 7.2 The UK Border Agency established the Active Enhancement Programme with the police in June 2009. The programme includes a multi agency approach to risk assessing non approved ports and joint communications to the non approved ports communities.
- 7.3 In Scotland and Northern Ireland, further progress has been made since the inspection and there has been a step improvement in information sharing. The UK Border Agency will continue to work with all relevant stakeholders to ensure a joined up approach to the risk assessment of small ports and undertake an increased level of joint deployment, specifically with the police.