



**THE UK BORDER AGENCY RESPONSE TO THE INDEPENDENT
CHIEF INSPECTOR'S REPORT ON THE RISK AND LIAISON
OVERSEAS NETWORK (RALON) IN PAKISTAN AND THE UNITED
ARAB EMIRATES**

The UK Border Agency thanks the Independent Chief Inspector for the report. The UK Border Agency notes that this is the first report on the Risk and Liaison Overseas Network (RALON) by the Independent Chief Inspector. The UK Border Agency also notes the Independent Chief Inspector's conclusion that "there were strong partner relationships" in place in the region which "helped RALON support the visa operation in tackling the high volumes of abuse in respect of visa applications and to exceed its target of denying boarding to 90% of inadequately documented passengers".

The UK Border Agency notes that this report recognises the challenge the Agency faces in fully implementing the International Liaison and Intelligence Directorate (ILID) transformation strategy by 2011.

The UK Border Agency response to recommendations from the Independent Chief Inspector's report on the Risk and Liaison Overseas Network in Pakistan and the United Arab Emirates.

1. Carries out an impact assessment of its work to reduce its level of RALON airport attendance and sets an objective to trial multifunctional working in the Region in 2010:

The UK Border Agency accepts this recommendation although it notes that work is already underway to introduce multifunctional working to the region.

1.1 The UK Border Agency has a target to prevent 90% of inadequately documented passengers from travelling to the UK from the locations RALON operate in. As the Independent Chief Inspector reports, the (former) South Asia and Gulf region prevented 96.8% of inadequately documented passengers from travelling to the UK in the year to March 2010. The effectiveness of this operation is due in part to the productive working relationships RALON has established with the carriers and immigration authorities in the region, as the Independent Chief Inspector observes in this report. Airport attendance is one of a range of tools the UK Border Agency employs to prevent inadequately documented passengers from travelling to the UK.

1.2 The UK Border Agency is already seeking to maximise the effectiveness of the overseas operation by reducing the reliance on routine attendance at airports in favour of a wider, more flexible approach to support the provision of advice and training to carriers and immigration authorities. In many locations, this operating model is already in place and delivering results. The UK Border Agency has already introduced fully multifunctional RALON teams in some locations and will continue to work towards establishing a fully multifunctional network by 2011.

1.3 The UK Border Agency has completed a detailed global assessment of Inadequately Documented Passengers (IDP) activity. This assessment will inform future decisions about the operational deployment of resources globally, including to this region.

2. Utilises the current review of Risk Profiles to standardise methodology and format using data and analysis from the rest of the UK Border Agency and from regular compliance analysis of visa issuing: The UK Border Agency accepts this recommendation.

2.1 In November 2009, the UK Border Agency initiated a project to standardise the methodology and format of the risk profiles used to inform entry clearance decisions. The project will be completed early next year; and a standardised template and methodology for risk profiling will be implemented by summer 2011.

2.2 The project is on track to deliver to the agreed timescale and, since this inspection, the testing phase of this project has been completed in a number of locations around the world.

3. Conducts an urgent review of RALON support for the UK Visa Section in order to ensure that RALON:

- **proactively supports the decision-making process, ensuring visa abuse and risk is communicated effectively to entry clearance staff; and**
- **fully utilises the intelligence opportunities provided by the UK Visa Section to assess and respond to visa abuse that is suspected or identified:** The UK Border Agency accepts this recommendation.

3.1 In March 2010, the UK Border Agency carried out a review of the level of support provided by RALON to the UK visa section. This concluded that a permanent Immigration Liaison Officer (ILO) should be recruited to support decision making and develop intelligence on abuse identified by staff in the visa section. An ILO has now been appointed, is currently undergoing training and will be fully operational by the end of November.

4. Ensures that all RALON staff understand their role as part of the Border Intelligence Service: The UK Border Agency accepts this recommendation.

4.1 From May 2010, all new RALON officers have received training in the role of the Border Intelligence Service (BIS). All new officers are directed towards the relevant background documents to enable them to compile their own reference library at post. They are also provided with an overview of the main UKBA intelligence products including the Strategic Threat Assessment, Tactical Assessments and target and problem profiles.

4.2 Prior to this, from 2006, new Risk Assessment Officers and Managers (from the legacy Risk Assessment network) received recognised training from the UK Border Agency Intelligence Directorate. This provided an introduction to intelligence handling, incorporating practical instruction on completing intelligence reports and an overview of the legislation that applies to all intelligence activity including the Data Protection Act, Human Rights Act and the Regulation of Investigatory Powers Act. Since the creation of RALON in October 2008, all new officers have also attended this course as part of their pre-posting induction programme.

4.3 The UK Border Agency recognises that officers who took up post before 2010 may not have received sufficient training to carry out a fully multifunctional role. An analysis of the training requirements for existing officers has recently been completed and cross-training has already commenced. Existing RALON officers are attending the revised three week induction courses for new RALON officers which commenced in May 2010.

5. Improve its handling and use of intelligence. In particular:

- **Clear the backlog of intelligence reports:** The UK Border Agency accepts this recommendation.

- 5.1 As the Independent Chief Inspector notes, there was no facility to access Mycroft at the RALON Operations centre prior to April 2010. As a result, a backlog developed. This resulted partly from the inability of staff to access the database without travelling to another office and partly because of limitations on the availability of staff for this task. Following the installation of Mycroft at the RALON Operations centre, priority was given to ensuring that the backlog was cleared. The UK Border Agency had cleared the backlog by September 2010. A new process is in place to ensure that, in future, all new intelligence reports are entered onto Mycroft in a timely fashion.
- **Undertake a fundamental and urgent review of guidance to:**
 - **Prevent intelligence being communicated by insecure means:** The UK Border Agency accepts this recommendation but maintains that, although officers did not use the correct format for reporting, the appropriate classification was used by RALON officers in this region.
- 5.2 Appropriately cleared RALON staff have always been able to send and receive RESTRICTED and CONFIDENTIAL information from Posts overseas. As the report notes, the upgrade to Firecrest has facilitated secure communication at higher levels of classification.
- 5.3 Guidance on the secure handling of information is available on both the FCO and Home Office internal websites. The UK Border Agency will also be issuing further guidance on information security to all RALON staff reminding them about the protective marking system requirements, and that their compliance with these rules is monitored.
- **Confirm whether the Manual of Standards is applicable to overseas intelligence handling and if so made available to all staff across the network. Where the Manual Standards is not applicable, RALON should issue bespoke guidance, agreed with the Intelligence Directorate:** The UK Border Agency accepts this recommendation.
- 5.4 The Manual of Standards does apply overseas. Since 2008, the Manual of Standards has featured in the training provided to new RALON officers by Intelligence Directorate. When the Manual of Standards was first published, the UK Border Agency sought to distribute it to staff based overseas. However it was not possible to achieve this within the limitations of the IT system in place at the time. The UK Border Agency has now circulated the Manual of Standards to all RALON officers and will place a copy onto the FCO intranet.
- **Ensure the region follows existing guidance for allegation handling to ensure consistency of approach across the network:** The UK Border Agency accepts this recommendation.
- 5.5 The latest version of the guidance on handling allegations has been re-circulated to all RALON staff. In addition to this, the current review of training requirements for existing staff will identify those who have not received training in intelligence handling, which includes guidance on handling allegations.
- **Ensure all intelligence reports are graded and that documents are classified according to the Government Protective Marking Scheme:** The UK Border Agency accepts this recommendation.

- 5.6 Following the recent upgrade of Firecrest, which allows easier access to restricted material, the RALON teams in Pakistan and the UAE have introduced new procedures to ensure that all intelligence is disseminated in an intelligence report; and that these reports are graded and classified against the Government Protective Marking Scheme.
- **Ensure that the completion and flow of intelligence is consistent across the network.** The UK Border Agency accepts this recommendation.
- 5.7 The new RALON training course introduced from May 2010 will help to improve intelligence handling practices overseas and ensure standard processes are utilised at all posts. This will be supported by the provision of bespoke training for existing staff who were posted prior to the introduction of this element of the course.
- 5.8 The RALON Operations Centre now provides feedback to Regional Managers on the quality of intelligence reports to facilitate a consistent standard of reporting across the network.
- **Ensure that all staff are aware of the requirements of the Data Protection Act 1998, and undertake the Agency's mandatory training in information assurance.** The UK Border Agency accepts this recommendation.
- 5.9 All staff should complete the Protecting Information e-learning course. This mandatory training was rolled out across the global network last year and more than 90% of UK Border Agency International Group staff completed the course before the end of the year. Four of the six RALON staff in Islamabad completed the training prior to November 2009 and, by December 2009, all but one ILA had completed the training. All RALON staff in the region have now completed this training. Line managers were told to ensure that all new staff at Post completed the mandatory training as a priority after joining, unless they had already done so, prior to their posting.
- 5.10 It is a Cabinet Office requirement that all staff undergo a Protecting Information e-learning course every year. The UK Border Agency has reminded RALON officers that they have a duty to ensure that all staff have completed this mandatory training and are aware of the requirements of the Data Protection Act 1998.
- **Has regular audits of its intelligence storage and handling processes.**
- 5.11 The UK Border Agency has already established procedures for providing assurance about information handling and processing within visa sections. This includes regular audits by UKBA and the FCO. The UK Border Agency will also ensure that systems for auditing the operations of RALON explicitly include intelligence storage and handling processes.

Other points raised in the report

The UK Border Agency offers the following comments on other observations made in the report for further clarification.

Paragraph 2 on page 5 reports that “more work was required to better measure performance”.

Since August 2010, the UK Border Agency has applied a new set of performance measures to capture information on the impact of the RALON network. These reflect the full range of activities undertaken by RALON to support the network's expanded multi-functional objectives.

Paragraph 3 on page 5 reports that “there was limited activity by RALON to identify and progress new investigations on its own account”.

Since May 2010, all new RALON officers have received training to enable them to initiate and support criminal investigations. However, the development of an investigative capability is part of the ongoing process of transformation which is not due for completion until 2011. In any event, the UK Border Agency would not envisage RALON progressing new investigations in isolation from the criminal investigations teams elsewhere in the UK Border Agency or key partners such as SOCA. The UK Border Agency also considers that this does not adequately acknowledge the progress that has already been made towards this objective with the police referral programme and the relationship that has been forged with law enforcement agencies in both locations.

Paragraph 3 on page 5 also reports that “RALON had not yet realised the UK Border Agency’s ambition to create a network of officers trained for a range of responsibilities”.

As before, although fully multi-functional teams are in place in some locations overseas, the UK Border Agency’s plan for the transformation of RALON has always acknowledged that this change will form part of an ongoing process of evolution until the conclusion of the transformation process in 2011.

Paragraph 7 on page 6 reports that “a particular problem was identified in respect of locally engaged support staff, who informed us that they had received little or no training since commencing work with RALON”.

The UK Border Agency recognises that all staff, both UK-based and locally engaged officers, play a vital role in enabling the Agency to meet its objectives overseas. In September 2009, locally engaged staff in the UAE, Oman, Saudi Arabia and Iran received basic intelligence handling training. The UK Border Agency accepts that staff in Pakistan should receive similar training. However, the UK Border Agency also notes that, in some locations, locally engaged staff cannot be security cleared to the appropriate level to enable them to receive training in sensitive matters such as intelligence handling. However, this does not prevent these members of staff from carrying out other types of work to support the RALON team.

A training needs analysis is currently underway for all locally engaged staff employed by RALON. The results of this analysis will inform our future strategy for providing appropriate training to our locally engaged staff.

Paragraph 9 on page 6 reports that “RALON did not have access to the Mycroft database”.

The UK Border Agency has now extended access to the Mycroft database to staff at the RALON Operations Centre. The UK Border Agency is taking forward a project to extend Mycroft access overseas.

Para 4.5 on page 11 reports that “our inspection of the UK Visa Section found a complete absence of intelligence activity to support decision makers in their work”.

The UK Border Agency believes that the decision to place a dedicated ILO in the Croydon hub will improve intelligence activity and the level of support provided to the hub. However, at the time of the inspection, intelligence support was already being provided to the Croydon hub by the RALON team in Islamabad who circulated intelligence alerts to the hub, gave support with

difficult cases and handled all allegations relating to Pakistani cases received by the Croydon hub.

Paras 5.2 on page 15 to 5.10 on page 16 report that “we found that RALON was not supporting the visa operation in the region as well as it or Visa Services Directorate wanted”.

At the time of the inspection, the UK Border Agency had already accepted that the risk profiles created to support ECO decisions should be standardised and improved. A project to bring about these improvements will provide a new methodology and template for risk profiles early in 2011. As well as standardising the methodology and format of risk profiles, this will ensure that risk profiles are developed utilising the wide range of data that is available to the UK Border Agency. However, the criticism of the service provided to the Visa Services Directorate appears to be based primarily on the ability of RALON to provide risk profiles and does not take account of the other ways in which the network offers support to decision makers. For example, the UK Border Agency notes that the team in Islamabad consistently achieved one of the highest forgery detection rates in the network as a result of joint work between RALON and the visa section to identify false documents. The UK Border Agency also notes that the Independent Chief Inspector reports the existence of good working relationships developed by the RALON team in Islamabad with external partners such as the Higher Education Commission and banking institutions to enable the verification of documents. By assisting with forgery detection, document verification and difficult casework, RALON provided support to the visa operation in the region.

Para 5.20 on page 19 reports that “different terms and conditions of employment were an inhibitor to cross-working”.

The UK Border Agency accepts this point but notes that differing terms and conditions existed solely as a result of the decision to merge the two legacy networks to form RALON. In future, new officers will be placed on a standard set of terms and conditions.

Para 5.22 on page 19 reports that “staff within the region said they lacked the necessary training to carry out investigations” and “there was no training or guidance relating to the UK Border Agency’s illegal drugs and commodities work”.

The new training course introduced in May 2010 includes modules on investigations and an overview of the UK Border Agency’s work on commodities. The review of existing training and skills has identified those officers who require additional training in order to carry out this type of work. The UK Border Agency is developing a plan to ensure that all existing RALON officers have received the necessary training by 2011.

Paras 5.24 and 5.25 on page 20 report that, “the TCG process was not yet operating as intended”.

The UK Border Agency accepts this but notes that the implementation of regional TCG processes forms part of the wider transformation programme for ILID. Guidance was issued to all regions in July 2010 on standardising regional TCG processes to ensure that they prioritise regional activity. Following the creation of the Gulf, Iran and Pakistan region, a new TCG process has been implemented in the region in line with this guidance. This TCG is driven by, and reports to, the International Group Strategic TCG.

Para 5.29 on page 20 reports that “RALON was not maximizing its opportunities to generate intelligence”.

The UK Border Agency notes that the report commends the practice of setting informal developmental targets for the completion of intelligence logs.

The UK Border Agency considers that the provision of intelligence training to all new RALON officers, the implementation of fully synchronised central and regional TCG processes and the reinvigorated approach to providing feedback on RALON intelligence products described above will enable the RALON network to make best use of its opportunities for generating intelligence.

Para 5.35 on page 23 reports that “Intelligence Directorate is currently conducting a review of debriefing which will address RALON’s requirement for guidance”.

This review is now complete. Training on debriefing is now embedded in the RALON training course implemented in May 2010. Guidance on debriefing, tailored to the international operating environment, was circulated to all RALON officers in September 2010.

Para 5.38 on page 23 reports that “we found there was no formal reporting to track progress against the UK Border Agency’s objectives”.

As described above, new performance measures have now been introduced. These focus on RALON’s four main functions overseas and provide a basis for analysing the region’s performance against the overall objectives of the network.

Para 6.24 on page 30 reports that “there were no formal Memoranda of Understanding or local policies in place... nor any formal feedback processes to assist evaluation”.

The UK Border Agency accepts this and will explore ways to generate feedback on cases referred to local law enforcement. However, it also notes that this will not be possible in all locations. The ILID Police Referral Program strategy, first published in 2007, stipulates that formal agreements such as MOUs should be sought whenever required for the effective operation of the programme. It also advises regions to seek feedback on cases wherever possible. The procedures governing each police referral programme should be reviewed every 6 months by the region or more frequently following an incident or on discovering evidence of a heightened risk. Since 2008, all RALON training courses have featured dedicated sessions on establishing and operating police referral programmes.

Para 7.5 on page 33 reports that “staff told us that they were confused by the structure and responsibilities within ILID departments in London, while RALON’s partners told us they were not clear about RALON’s responsibilities.

The UK Border Agency accepts the need to improve RALON officers’ understanding of the role of ILID Departments in London. ILID has initiated a consultation to improve communications both within the Directorate and with external partners. This will examine how communications can be improved between London and the overseas network to ensure that all officers understand the responsibilities of their colleagues in other parts of the Directorate.

The UK Border Agency also delivers training to other liaison officer networks to ensure that partners understand the role of ILID overseas and the responsibilities of its officers. In the last year training has been delivered to: SOCA Liaison Officers, HMRC Fiscal Crime Liaison Officers and Australian liaison officers based in Europe.

Para 7.8 on page 34 reports that “the induction training will be extended to three weeks commencing with the first three courses in 2010”.

The UK Border Agency introduced a new three-week training course for RALON officers in May 2010. This provides guidance and essential training to new and existing officers on the full range of activity carried out by the multi-functional network. The UK Border Agency is developing a plan for ensuring all existing officers' training needs are met by 2011. Although it would not be appropriate for locally engaged ILAs to attend the full RALON training course, the UK Border Agency will also develop a plan for ensuring that all locally engaged RALON staff receive training relevant to their individual roles.