



# **UK Border Agency's operations in the North West of England Command and Control Unit**

March – April 2010

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**Independent Chief Inspector of the UK Border Agency**

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# Foreword from John Vine CBE QPM



The Command and Control Unit (CCU) was established in 2006 by the then Immigration and Nationality Department in the aftermath of the tragedy that occurred in Morecambe Bay. It remains an important national link between the UK Border Agency and a growing number of other agencies, most notably the police service.

I find that there is now a pressing need for a fundamental review of the CCU's core role and purpose in order for the UK Border Agency to be confident that it has the capability to deal effectively with the command and control of a major incident.

In the face of increasing demand for CCU's services from its stakeholders, it is particularly important that the UK Border Agency should develop formal arrangements to manage both the sharing of information with others and ensure its own data quality. This should be underpinned with straightforward but rigorous performance standards.

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 of the Command and Control Unit (CCU) examined how this 24 hours/seven days a week operation supports and monitors critical incidents for both the UK Border Agency and a wide ranging selection of other stakeholders. An assessment was made as to its efficiency and effectiveness.
2. We found that the overall purpose of the CCU was unclear. The CCU was unable to accurately measure the demand placed upon it, although the work of the Unit was demand driven. There was limited data analysis in terms of the identification of trends, forecasts and priorities.
3. The CCU had seven objectives, each of which had a target of 100% compliance, with limited mechanisms in place to measure performance against them. While there was some evidence that calls were monitored we remain concerned by the unit's limited ability to accurately measure their performance across all objectives.
4. Overall, we found that the CCU had good relations with their stakeholders and that there was good collaborative working with the police. The Police National Computer team in particular had developed working relations and working practices with 34 different stakeholders.
5. However, there were no written protocols between the CCU and its external stakeholders about the level of service to be provided, and the obligations incumbent upon those bodies receiving the service.
6. We have concerns about the handling and security of information held and managed by the CCU. We could find no evidence of any formal arrangements for the sharing of data between the CCU and its numerous external stakeholders such as the police service.
7. We are concerned that information currently held on the Police National Computer (PNC) about individuals, which is owned by the UK Border Agency, may not be up to date, accurate or comply with Data Protection legislation.
8. We could find no evidence of formal communication plans to ensure that the UK Border Agency and external stakeholders are kept aware and up to date about the role of the CCU.
9. One of the CCU's functions was to support and monitor critical incidents for the UK Border Agency. We examined the CCU's own arrangements to react to any incident that might affect its own operational continuity. Although we did find that there was a business continuity plan in place we found that this plan had never been tested.
10. We found that each critical incident was evaluated and a 'lessons learned' log was produced but were disappointed that no use was made of this information for the wider benefit of the UK Border Agency.

## 2. Summary of Recommendations

### **We recommend that the UK Border Agency:**

1. fundamentally reviews the purpose of the CCU and introduces call monitoring standards to ensure that callers' enquiries are handled effectively
2. accurately measures the performance of the CCU against an agreed suite of performance indicators
3. implements a formal stakeholder engagement system in the CCU which informs performance and harnesses the expertise of the Police National Computer (PNC) Team
4. introduces Information Sharing Agreements with client organisations so that responsibilities and levels of accountability are clearly defined
5. immediately reviews the current information security procedures in the CCU
6. ensures that all records currently held on the PNC are up to date, accurate and comply with data protection legislation
7. regularly tests the CCU business continuity plan
8. uses the experience of the CCU to formally learn from critical incidents and subsequently inform regional and national risk registers
9. implements a more formal approach to quality assurance of the CCU.

## 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. In 2009, the Independent Chief Inspector's remit was extended to include customs functions and contractors.<sup>1</sup>
- 3.2 The Chief Inspector is independent of the UK Border Agency and reports directly to the Home Secretary.

### **Purpose and Aim**

- 3.3 This inspection of the Command and Control Unit (CCU) formed part of a wider inspection covering some of the UK Border Agency's operations in the North West of England. The terms of reference for this inspection were:
- to undertake a discrete inspection of the Command and Control Unit (CCU) collecting evidence to measure the efficiency and effectiveness of the Unit.

### **Scope**

- 3.4 The scope of the inspection was to assess:
- how the CCU performed against its own targets;
  - the processes employed for responding to operational requests from other UK Border Agency colleagues and external stakeholders; as well as how the CCU evaluated processes with a view to improve;
  - how the CCU managed the handling of data between other parts of the UK Border Agency and external stakeholders, for critical incidents and operational support services; and
  - the processes employed by the CCU for managing critical incidents. This included how incidents were reported, the level of training provided to staff, the levels of awareness of the CCU function across the UK Border Agency and the evaluation/lessons learned following the conclusion of incidents.

### **Inspection Criteria**

- 3.5 The inspection was carried out against a selection of the Chief Inspector's Core Criteria covering the following three themes;
- High level outcomes of the business;
  - Processes and procedures including quality of decision-making and consistency of approach; and
  - Management and leadership.
- 3.6 The criteria used for this inspection can be found at Appendix 1.

<sup>1</sup> [http://www.legislation.gov.uk/ukpga/2009/11/pdfs/ukpga\\_20090011\\_en.pdf](http://www.legislation.gov.uk/ukpga/2009/11/pdfs/ukpga_20090011_en.pdf)

**Methodology**

- 3.7 The on-site phase of the inspection took place between 21-23 April 2010. A one day pre-inspection planning meeting was held on-site on 26 March.
- 3.8 A range of methods were used during the inspection, including:
- seven interviews and four focus groups held with staff at all levels;
  - interviews with four key stakeholders;
  - an internet based staff survey was sent to all 43 members of staff within CCU, with a response rate of 72% (31 responses); and
  - reviewing documentation provided by the CCU.
- 3.9 On the final day of the on-site phase of the inspection, high level emerging findings were provided to the senior managers responsible for the CCU.
- 3.10 The inspection identified nine recommendations for improvement to operational service delivery in the CCU. They are set out on page five of this report.



# 4. Background

## Background

- 4.1 At the time of the inspection, the UK Border Agency was structured into five primary segments – the four operational areas of Border Force, Immigration Group, International Group, and Criminality and Detention Group and the Corporate Services segment which includes the centralised management of Financial Management, Human Resources, Policy and Management Information. The majority of UK based staff work within either Immigration Group or Border Force.
- 4.2 The UK Border Agency presence in the North West of England is made up of a part of Border Force North<sup>2</sup> and Immigration Group North West<sup>3</sup>, which contains a number of national functions that support operations across the UK Border Agency.

## Control and Command Unit (CCU)

- 4.3 The CCU is part of the Immigration Group North West and sits within Enforcement and Compliance.
- 4.4 The CCU was set up in 2006. It was established to provide a single point of contact following the Morecambe Bay tragedy. On 5 February 2004, 23 Chinese cockle pickers were drowned (only 21 bodies were ever recovered) by the incoming tide in Morecambe Bay. At that time there was no established process for the then Immigration and Nationality Directorate to contact appropriate staff to deal with such a situation, particularly out of office hours.
- 4.5 The CCU was originally a joint UK Border Agency and police unit, with staff from both organisations. However, staffing is now drawn only from the UK Border Agency.
- 4.6 The CCU delivers support to the police and UK Border Agency operational staff, including International Group, on a 24 hour/seven day basis. It also undertakes work for other government departments such as:
- the Department of Work and Pensions (DWP) and
  - Her Majesty's Revenue and Customs (HMRC).
- 4.7 In July 2009, the CCU took on additional responsibility from the Evidence & Enquiry Bureau (EEB) – another UK Border Agency unit. The EEB, now known as the Evidence & Enquiry Unit (EEU) gives general advice and guidance to other government departments/agencies. The CCU took on the responsibility for some of these agencies so that as well as general advice, decisions could also be taken by officers working within the CCU. Some of the agencies that are now able to receive a service from the CCU are the:
- Solicitors Regulatory Authority (SRA);
  - National Offender Management Service (NOMS) within the Ministry of Justice;
  - Driver and Vehicle Licensing Agency (DVLA);
  - Crown Prosecution Service (CPS);
  - Serious Organised Crime Agency (SOCA); and the
  - Student Loans Company.

<sup>2</sup> Three regions – North, Central and South

<sup>3</sup> Six regions – London and South East, East and West Midlands, North West, Wales and South West, Scotland and Northern Ireland

- 4.8 The CCU work with Local Immigration Teams (LIT's) or Local Enforcement Offices (LEO's) during the day but act as a single point of contact when LIT's/LEO's are closed, between 21:00hrs and 07:30hrs each day.
- 4.9 In addition to providing operational support, the CCU has oversight of all critical incidents<sup>4</sup> on behalf of the UK Border Agency. Examples of these are death or serious injury to people detained in immigration removal centres or the effect of a natural disaster such as the Volcanic Ash situation in April and May 2010. This role includes the operation of a Gold Control<sup>5</sup> where necessary and making the appropriate referrals to the Independent Police Complaints Commission (IPCC) for incidents that occur in England and Wales. The CCU does not have in place arrangements with the Police Complaints Commissioner for Scotland or the Police Ombudsman of Northern Ireland.
- 4.10 The main functions<sup>6</sup> of the CCU are:
- conducting real time checks on the immigration status of individuals for the UK Border Agency staff and other stakeholders;
  - management of critical incidents for the UK Border Agency;
  - acting as a point of contact for out-of-hours Judicial Reviews, Injunctions, Further Representations on individual cases and MP representations; and
  - arranging for immigration entries on the Police National Computer (PNC) to be updated.
- 4.11 The CCU's objectives contained in the Immigration Group North West's Enforcement & Compliance Business Plan 2009-10 are:
- to provide accurate advice and support to all stakeholders;
  - to provide 24 hour support to critical incidents within the UK Border Agency;
  - to refer appropriate critical incidents to the IPCC in England and Wales within two hours;
  - to provide immediate response to out-of-hours injunctions against removal;
  - to respond to all Risk and Liaison Overseas Network (RALON) checks within 48 hours;
  - managing all Overseas Visitors Records Office (OVRO) PNC referrals, responding within seven days; and
  - ensuring 'absconder'<sup>7</sup> notifications and recovery notifications are sent to OVRO on the day of receipt.

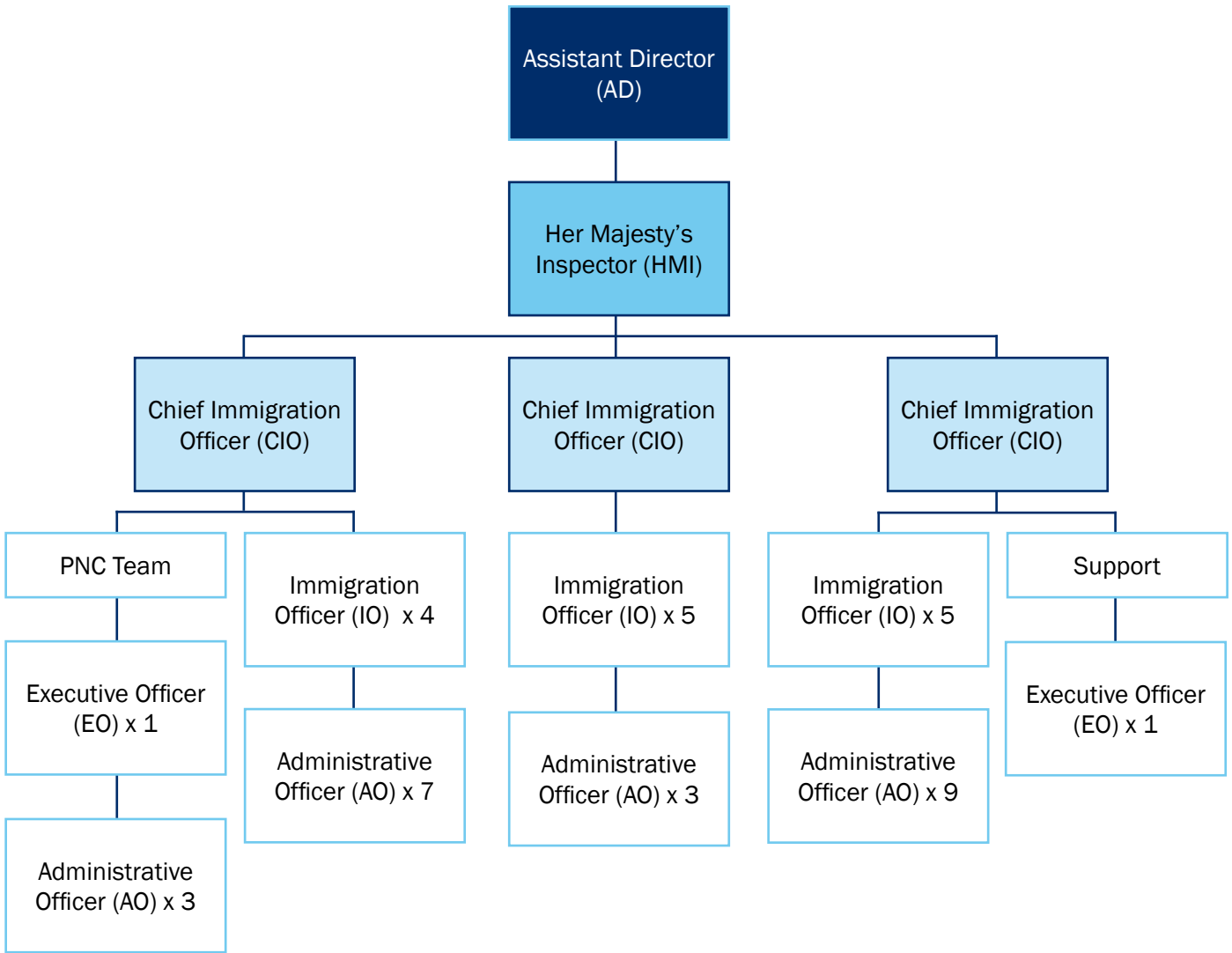
4 Any incident where the planning, event, outcome or consequence of that incident is likely to result in: serious harm to any individual, significant community impact or a significant negative impact on the confidence of the public in the UK Border Agency

5 Gold Control sets out the strategic plan for the handling of a critical incident. They have ultimate responsibility for the events during any incident for their period of tenure.

6 UK Border Agency North West Enforcement and Compliance Business Plan 2009/10

7 Term used by the UK Border Agency to describe a person who the Agency has lost contact with, who has breached reporting restrictions or bail conditions and/or who they are unable to make contact with via their last known address

**Figure 1: Organisational Structure of the CCU**



## 5. Inspection findings – High level outcomes of the business

### General criterion:

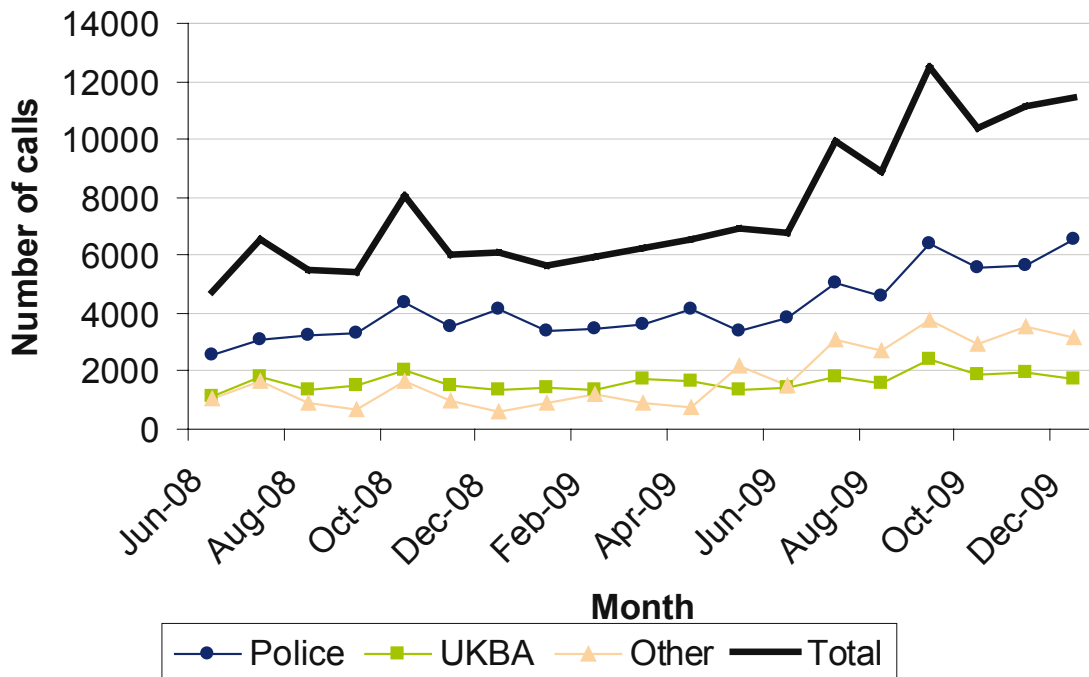
Corporate Health – The UK Border Agency is a high performing, customer-focused workforce delivering its strategic objectives

### Specific criteria:

Resources are focused on priorities and

There is evidence that the UK Border Agency is flexible and responsive to changing circumstances

- 5.1 We found a lack of clarity amongst staff from the CCU about their primary purpose. It was also clear that the CCU was not able to accurately measure the demand placed upon it despite the work of the unit being driven by demand. We noted limited data analysis in terms of the identification of trends, forecasts and priorities. This subsequently impacted on the ability of managers to plan.
- 5.2 At the time of the inspection, the CCU was working closely with a number of important stakeholders ranging from external stakeholders such as the Police, DVLA and the Student Loans Company, to internal stakeholders in other parts of the UK Border Agency, e.g. Local Immigration Teams (LITs). Figure 2 below shows calls into the CCU from June 2008 to December 2009.
- 5.3 The CCU monitored the number of calls it received on a monthly basis (see Figure 2 below), but due to a lack of technical equipment, it was not able to determine the number of calls it missed, how long it took to answer calls or how many callers hung up before the call was answered.
- 5.4 At the same time, feedback during staff interviews and focus groups was that the CCU was operating in an environment where demand was seemingly exceeding supply. As a result, we were concerned that the CCU was finding it difficult to focus on its priorities. Calls into the CCU ranged from real time enquiries from police officers requiring the current status of foreign nationals, which required urgent attention, to slow time enquiries from administrative units which can be dealt with over a longer period. Therefore, it is imperative that the CCU are aware of where demand is required.
- 5.5 We also found that the CCU's ability to adapt to changing circumstances was limited. This lack of strategic planning was confirmed by CCU staff. We heard numerous comments from staff at all levels stating that *'it was difficult to plan in a demand led environment'*. It meant that all decisions about allocating resources were based on the number of calls answered.
- 5.6 In addition to this, the CCU was turning away work. For example, the Identity and Passport Service had asked for the CCU to provide status checks of approximately 30,000 applicants per annum, but the CCU were unable to meet the request. As one manager quoted "we are a victim of our own success" referring to the increasing number of calls being received by the CCU.

**Figure 2: Total monthly calls to the CCU from June 2008 to December 2009**

- 5.7 Using data supplied by the UK Border Agency, we were able to analyse the breakdown of calls answered by the CCU and produced the graph at Figure 2 above. This shows that the demand on the CCU increased in 2009. Although there was no noticeable increase in calls from other parts of the UK Border Agency, there was a noticeable rise in the number of calls from both the police and 'other' sources and this seemed to co-incide with the CCU taking on additional work from the Evidence and Enquiry Bureau (EEB) in July 2009.
- 5.8 During the on-site phase of the inspection, we found no evidence that there had been a review of the processes to ensure that demand was being met. When the CCU took on work from the EEB, five extra posts were created to absorb the extra workload. However, six staff had since left, leaving the CCU with an overall net loss of one staff member. Subsequently the UK Border Agency subsequently advised us that the CCU did review its processes regularly, and provided us with a written example.
- 5.9 CCU managers told us of inconsistent services being provided to stakeholders. For example, we were informed that as call volumes increased to an extent where the CCU could not meet the demand, a decision was taken to stop providing a service to Local Immigration Teams (LITs) during normal office hours. However, Manchester and Liverpool LITs retained their service and in return, we were informed that staff could be deployed from these LITs to assist the CCU during busy times. We also noted that there was a business case in development to provide a service to London's LITs for which the CCU would receive some funding from the London and South East region.
- 5.10 The CCU was unaware of the actual number of calls it received into the unit because there was no facility to monitor this. Some CCU managers did collect data on the number of telephone calls answered and emails received as enquires. However, they were unaware of the number of calls missed. Therefore, resources were allocated to the busiest times measured simply by the times when most calls were answered.
- 5.11 We believe that without accurate management information on the total number of calls made to the Unit; it was difficult for the CCU to predict and plan effectively for the future or to actively manage changing priorities.

- 5.12 It is critical that the CCU identifies and prioritises its primary purpose and prioritises its customers. At the time of the inspection, the CCU did not know if its main purpose was to serve the UK Border Agency or its other stakeholders. If the UK Border Agency was to be the CCU's priority customer, then the significant number of other CCU stakeholders would compromise this capability. If the CCU's main purpose was to serve its other stakeholders, then we had concerns that the CCU would be acting as a quasi-call centre for the UK Border Agency and other government departments.

### **We recommend that the UK Border Agency:**

- fundamentally reviews the primary purpose of the CCU and introduces effective call monitoring standards to ensure that callers' enquiries are handled effectively.

### **Information Technology**

- 5.13 Staff raised concerns regarding the lack of investment in modern technology. They told us they needed extra computer monitors so that different programmes could be opened at the same time.
- 5.14 This was particularly relevant to staff who worked on the management of critical incidents where information needed to be recorded and researched simultaneously. Critical incidents were logged using a word processing document and staff had to continually close the document to open other programmes or access other systems for information to add to the incident log.
- 5.15 Dual screens might provide a more effective process to the oversight of critical incidents and reduce the risk of information being missed or omitted in error. We noted that upgrading the technology was under consideration by senior managers, but was subject to a decision on funding.

### **General criterion:**

The borders are secured and immigration is controlled for the benefit of the country

### **Specific criteria:**

There are clear and realistic performance targets to drive improvement

There is evidence of diligent business planning

- 5.16 The CCU had seven objectives, outlined in bullet 4.11. Each had a target of 100% compliance. We were concerned to find that there were very limited mechanisms in place to measure performance against these objectives and found no evidence of management information being recorded for any of the objectives. We found some evidence that calls were monitored but were only informed, after the on-site phase of the inspection, that the unit made use of formal data quality checks to monitor calls. We were shown some examples of these. However, we remain concerned by the unit's limited ability to accurately measure their performance across all objectives.
- 5.17 We considered that some of these objectives might be difficult to monitor, for example, 'accurate advice was given' or the provision of an 'immediate response'. The lack of management information suggested that no analysis was taking place and during interviews, managers confirmed that this was the case. Staff and managers told us that they considered that the demand-led nature of the work made it difficult to quantify their performance.
- 5.18 At the time of the inspection, we found no evidence that managers had examined similar demand-led organisations, for example police control rooms to identify good practice. We were later informed that visits had been made to a number of police control rooms and the HM Revenue and Customs (HMRC) National Coordination Unit in Ipswich, although we cannot verify how these visits informed the business planning process.

- 5.19 In addition to the published objectives, staff and managers referred to an internal objective written into the Performance Development Reviews (PDR) of staff – to answer all incoming calls within four rings. We found no evidence of any accurate mechanism to record the performance against this internal target. Some staff referred to line managers being aware of calls and listening to the number of rings but we did not consider this to be a credible method of monitoring performance.

### We recommend that the UK Border Agency:

- accurately measures the performance of CCU against agreed performance indicators.

### Specific criteria:

There is effective joint working with delivery partners and stakeholders

- 5.20 We found nothing to suggest a poor relationship between the CCU and its many stakeholders but we were concerned about the lack of a shared understanding between the CCU and its stakeholders about the level of service to be provided, what would not be provided and what the obligations were on the part of those bodies concerned.

### Stakeholder engagement and Collaborative working

- 5.21 We found some areas for improvement with the management of stakeholders and we also found evidence of good stakeholder relations.
- 5.22 During the inspection we spoke with four key stakeholders<sup>8</sup> identified by the CCU and were informed by managers that engagement with stakeholders was generally on an ad hoc basis. Our findings supported this as we found no evidence of any formal stakeholder engagement plan, Service Level Agreement or minutes of meetings between the CCU and its stakeholders.
- 5.23 Some staff at Administrative Officer (AO) level within the CCU acted in support of their managers' role as the 'single point of contact' (SPOC) for some stakeholders and we found that they were not given clear guidance about what their roles and responsibilities were in relation to this work. It was predominantly an advisory role to assist with queries and any process issues but stakeholders often expected a level of strategic guidance. These staff were given no specific additional training for this support role.
- 5.24 We were also informed that Chief Immigration Officers (CIO) had some specific responsibilities as SPOCs, for example the CIO with responsibility for the police had an objective to raise the profile of the CCU amongst the policing community. As there was no formal stakeholder plan it was left to the individual to determine how best to carry out their objective.
- 5.25 The Police National Computer (PNC) team within the CCU were responsible for managing entries that were held on the PNC for people who were within the immigration system, for example, an asylum seeker awaiting a decision, but whose whereabouts may be unknown. The PNC team did not have online access to the PNC. The management of the entries consisted of the PNC team receiving printed records from Hendon Data Centre<sup>9</sup>. The PNC team would then contact the relevant colleagues within the UK Border Agency to check whether the records remained accurate and relevant.
- 5.26 As part of this role, the PNC team also provided tracing assistance for other units within the UK Border Agency. To assist in this role the PNC team had developed working relationships and working practices with 34 different stakeholders who held personal information that could be used to identify the location of individuals. These stakeholders included utilities companies, supermarket loyalty programmes and a credit checking company. These stakeholders did not have access to the PNC themselves.

<sup>8</sup> Independent Police Complaints Commission, Greater Manchester Police, National Offender Management Service, Metropolitan Police Service

<sup>9</sup> A division of the National Policing Improvement Agency (NPIA) responsible for the management and operation of the Police National Computer.

- 5.27 Although stakeholder engagement was ad hoc we found evidence of good collaborative working with the police. The first example included the work carried out with Greater Manchester Police during the policing of the Conservative Party Conference in 2009 in which the CCU provided telephone support to check on the status of individuals who came to the attention of the police.
- 5.28 The CCU also carried out an operation with Greater Manchester Police in Bolton to conduct status checks of all non-EU nationals who reported their passports stolen or missing to the police. During a 10 month period between January and October 2008, 552 passports were reported with 107 being non-EU nationals. Of these, the operation identified that 50 people were in the country illegally and the status of 20 more were classed as unknown and warranted further investigation.
- 5.29 The latter operation identified potential benefits of the collaborative approach between the UK Border Agency and the police. However we found no evidence that good practice from this operation had been disseminated throughout the CCU or fed back to the Regional Director so they could publicise their success to the wider UK Border Agency.
- 5.30 The feedback from the stakeholders we met, suggested that stakeholders were content with the level of service being provided. However, whilst we found good evidence of joint working, we also felt that opportunities to develop the outcomes of joint working had been missed. For example the joint operation with Greater Manchester Police in Bolton referred to above had not been publicised to the wider UK Border Agency thus missing an opportunity to work with other police forces and identify further people who were in the country illegally. We felt that this required an improvement to the way the CCU interacted with its stakeholders beyond single projects and day to day business.
- 5.31 The CCU was signed up to the Customer Service Excellence (CSE) Programme – a Cabinet Office ‘improvement tool to help those delivering public services to put their customers at the core of what they do’<sup>10</sup>. The aim of the programme was for government departments to assess themselves against set criteria and demonstrate competence in providing services.
- 5.32 In terms of communicating with stakeholders, the programme states that “by identifying and engaging with your key stakeholders you will be better able to secure support and head off potential issues”. We believe that in order to deliver customer service excellence and benefit from the opportunities provided by effective stakeholder engagement, the CCU should develop formal stakeholder engagement plans both internally and externally.
- 5.33 We made a similar finding in our report “Inspection of UK Border Agency Operations in Wales and the South West” which was published in July 2010<sup>11</sup>.

#### **We recommend that the UK Border Agency:**

- implements a formal stakeholder engagement system in the CCU which informs performance and harnesses the expertise of the PNC team.

<sup>10</sup> <http://www.cse.cabinetoffice.gov.uk/homeCSE.do>

<sup>11</sup> <http://icinspector.independent.gov.uk/wp-content/uploads/2010/07/Inspection-of-UK-Border-Agency-operations-in-Wales-and-the-South-West.pdf>



## 6. Inspection Findings – Processes and procedures including quality of decision making and consistency of approach

### General criterion:

Decisions made are fair and consistent.

### Specific criteria:

Risks, including protecting the public, are assessed and inform decision making.

There are clear procedures for handling data, including identity management, in accordance with national security and data protection requirements including identification of risk.

- 6.1 We had three concerns regarding the security and handling of information held and managed by the CCU.
- 6.2 First of all, we were concerned to find no evidence of any formal arrangements for the sharing of data between the CCU and its numerous external stakeholders such as the police. Information that was shared included personal information held on UK Border Agency systems, for example on individuals who were the subject of immigration, nationality or asylum applications. The information was shared via telephone conversations or electronically via e-mail. There were no agreements in place setting out the responsibility and accountability of each party, what information could be shared, with whom in what circumstances and the consequences of breaching the agreement.

### We recommend that the UK Border Agency:

- introduces Information Sharing Agreements with client organisations so that responsibilities and levels of accountability are clearly defined.

### Caller Verification

- 6.3 Secondly, an informal approach existed towards the verification of callers into the unit requesting personal information held on the UK Border Agency systems. During the inspection, we found that only very basic checks of internal callers were carried out e.g. name, department and reason for calling. Staff did not routinely carry out any further checks to verify the identity of the caller.
- 6.4 Standard Operational Procedures (SOP's) used by the unit provided detailed instructions about confirming the authenticity of a caller, especially if the member of the CCU had any doubts about the caller. However staff informed us that they used a 'common sense' approach. This might have been acceptable if the caller was already known to the unit, through previous or regular dialogue, but was unacceptable for governing the verification of unknown callers who provided a mobile phone number as their sole means of contact. There was an increased risk of unlawful disclosure of information if care was not taken to verify the identity of the caller correctly.
- 6.5 Thirdly, we had similar concerns with regard to agencies that were entitled to information from the CCU. The CCU operated a password system whereby callers from a number of agencies had to provide a password before any information was disclosed. A password was required from the:

- Parole Board;
  - Prison Service;
  - Solicitors Regulatory Authority; and the
  - Student Loans Company
- 6.6 Normally, this would add a level of security to the information but in the case of the CCU, we were informed that the passwords for those agencies had not been changed since the relevant agency started receiving a service from the CCU.
- 6.7 Information held by the CCU which is shared with agencies is considered to be an information asset. Access and disclosure of this information should therefore be subject to Home Office guidance and policy for access control, along with other relevant industry standards<sup>12</sup>. The CCU should consider any risks that result from passwords not being changed, for example, staff turnover amongst agencies and the risk that passwords and procedures can be divulged. Current Home Office guidance for access control relating to information states that passwords should be changed regularly. The minimum requirement should be when CCU becomes aware of personnel changes within a relevant agency.

### **We recommend that the UK Border Agency:**

- immediately reviews the current information security procedures in the CCU.

#### **Police National Computer**

- 6.8 We noted that the PNC team were dedicated and professional, but we were concerned that the UK Border Agency owned information, currently held on the PNC, may not be up to date, accurate or comply with data protection legislation. We also questioned whether current arrangements for updating the PNC represented value for money.
- 6.9 Staff mentioned the time delays resulting from their lack of access to the PNC causing inefficiencies in processes and risks to the organisation. It was noted that staff were unable to amend the details of individuals on the PNC. In order to have details added or removed from the system the relevant information would have to be sent to the Overseas Visitors Records Office (OVRO) of the Metropolitan Police.
- 6.10 We were told that there was a commercial contract between the UK Border Agency and OVRO to provide this facility for updating the PNC.
- 6.11 The time taken to update the PNC by OVRO was approximately 48 hours, as all requests for updates had to be transferred manually by a contracted secure courier. There was no means by which the requests could be transferred electronically.
- 6.12 Since the CCU was set up in 2006, 28,000 records have been placed on the PNC which falls under the ownership of the UK Border Agency. Since its creation, the CCU PNC Team has systematically reviewed the records and have reduced this number to 17,500. However, we were informed that when they found a record on the system that appeared old and in need of review, they then informed the case owner, located in another part of the UK Border Agency. It was then down to the case owner to decide on the action to take; to either remove the case from the system or retain it because the current information was still correct.
- 6.13 Staff believed that there was a lack of awareness amongst case owners and managers about the PNC; consequently information could be retained even when it was no longer required. This process left the UK Border Agency open to potential risk because individuals could inadvertently be detained on the basis of outdated information.

<sup>12</sup> ISO 27001 – Information Security

### We recommend that the UK Border Agency:

- ensures that all records currently held on the PNC are up to date, accurate and comply with data protection legislation.

#### Business Continuity

- 6.14 We examined the ability of the CCU to react to any incident that affected the running of the Unit. We found that there was a business continuity plan in place, as required by the Home Office and UK Border Agency; however, we were also informed that this plan had never been tested.
- 6.15 It is imperative to test business continuity plans on a regular basis, at least annually. This ensures that in the event of an incident that affects the operation of the unit, there are no obstacles in place to prevent normal business being resumed as soon as practicable. This seems even more vital for a unit that itself deals with critical incidents on behalf of the UK Border Agency.

### We recommend that the UK Border Agency:

- regularly tests the CCU Business Continuity Plan.

#### Evaluation of lessons learned from critical incidents

- 6.16 We found that although each critical incident was evaluated by a Chief Immigration Officer from within the CCU and “lessons learned” were produced for each critical incident, it was not apparent that this information was shared for the wider benefit of UK Border Agency.
- 6.17 All critical incidents were evaluated. The CCU produced ‘lessons learned’ and as the central point for recording information, we noted that the Unit would be well placed to share this evaluation across the UK Border Agency and identify any aspects of the incident that could lead to improved service.
- 6.18 However, once the incident was closed, the lessons learned were not collated or shared. They stayed with the Gold Commander who had operational responsibility for the incident and was not part of the CCU. This individual had the responsibility for identifying any information that could be shared across the UK Border Agency.
- 6.19 Staff informed us that they were unaware of any formal process whereby any lessons learned were collated. This was also confirmed by managers. The CCU role was simply to record the details of the incident and store a copy of the incident log for a prescribed period of time before it was destroyed. We believed that this approach did not make use of the information and that an opportunity to improve processes and services was being lost. The information could be used to minimise the risk of incidents occurring in the future or to improve business processes across the UK Border Agency.

### We recommend that the UK Border Agency:

- uses the experience of the CCU to formally learn from critical incidents and subsequently inform regional and national risk registers.

## 7. Inspection Findings – Management and Leadership

### General criterion:

There is clarity about an individual's role and purpose.

### Specific criteria:

Staff receive appropriate good quality training, including diversity and equality, when it is needed to equip them with the necessary knowledge and skills to enable them to deliver services fairly to customers.

### Training

- 7.1 After interviewing staff and using the results of our staff survey we found numerous positive examples regarding training. However we also noted areas for improvement, particularly if staff were promoted within the CCU or given specific duties, for example as a support to the SPOC.
- 7.2 The CCU oversaw the management of critical incidents for the UK Border Agency and staff were given opportunities to be trained to the required standards for managing these incidents.
- 7.3 Managers at HM Inspector (HMI) and CIO levels within the CCU were trained as Gold Commanders so that they could take interim responsibility should a critical incident occur and no other Gold Commanders were available at an operational level. This was good practice and ensured suitable management of an incident at all times.
- 7.4 Other staff at IO or AO levels within the CCU were trained to Silver<sup>13</sup> or Bronze Commander level. Similarly, this placed them in a position to identify and deal with issues associated with a critical incident, whilst carrying out their role for logging all relevant activity relating to the incident.
- 7.5 In addition to critical incident training, we found that staff were provided with a bespoke training course when they were new to the CCU. The training was directed specifically to their role in CCU.
- 7.6 We also found that staff received additional training where there was a business need or when development opportunities had been identified as part of a Personal Development Plan. A CIO undertook training needs analysis to ensure that staff were equipped with the relevant skills, providing ad-hoc training where necessary. One example of this was forgery training which enabled staff to provide advice over the phone and assist callers in identifying false documents.
- 7.7 Generally, there was a positive attitude towards training and staff felt that they had the chance to develop and were not inhibited about requesting training to improve their skills and/or competencies. Staff told us that when starting with the CCU, they were also given a copy of the Standard Operating Procedures and a copy of the Immigration Enforcement Manual. We reviewed the Standard Operating Procedures and considered them to be comprehensive
- 7.8 We found that other than the bespoke training provided when staff joined the Unit, there was no additional training if staff were promoted within the CCU. Staff promoted to Chief Immigration Officer grade learnt 'on the job'. We also found that if staff were given specific duties, for example, when acting as a support to the SPOC for a third party agency, no training was provided to carry out this role.

<sup>13</sup> **Silver** Commander formulates a **tactical** plan to achieve Gold's strategy, and passes this to **Bronze** Commander who takes the **operational** decisions necessary to implement it.

## Recording of Information

7.9 We had some concerns surrounding the recording of information received by the Unit which we believed to be a training issue. All calls answered were recorded on a telephone recording system. CCU staff who answered incoming calls also wrote out a call log. These were hard copy standard templates containing the time, date and detail of the call. However, there was no other unique reference number assigned to this call log, nor were they stored in any sequence other than time and date order.

7.10 There was no clear record as to the number of logs that had been generated nor could they be easily located if the time and date of the incident were not known. We noted that this caused an administrative burden if the log needed to be referred to in the future.

### **Performance of all staff is reviewed regularly and improvement plans are in place for those identified as less effective.**

7.11 We were concerned to find that the CCU was not considering the level and range of information that could be collected and used for monitoring performance against targets and also for monitoring the performance of staff.

7.12 We found evidence of clearly defined job descriptions within the CCU. Some of these descriptions extended to five or six pages to ensure staff were fully aware of their role. Clarity of roles and responsibilities is particularly important in the Unit as only warranted officers can perform some functions and make certain decisions, e.g. the detention of a potential illegal immigrant.

7.13 One of the CIOs had responsibility for checking the quality of call logs and taped telephone calls. Call logs were reviewed to ensure that all relevant information was recorded and a randomly selected three hours of taped calls were reviewed each week. Any areas for development or improvement were discussed with the relevant member of staff. Whilst all staff commented that these areas were acted upon, we found that no records of this quality assurance were kept.

7.14 In order to highlight this point, the following are examples of objectives within the PDR of AO staff who were responsible for answering telephones and dealing with enquiries:

- To answer calls promptly (within four rings) and courteously, taking full and accurate details of the caller and the enquiry. Ensuring that templates are fully completed, including all details of the caller, type of call, subject, checks completed, status, notes and outcome. All noted clearly and legibly on the template.
- To provide accurate, relevant and up to date details to the caller, following the appropriate use of all available tools and databases, in accordance with SOPs and Data Protection Act policy.
- To make full, accurate and relevant referrals to the duty IO, having first obtained all the relevant information from the caller, Home Office systems etc.

7.15 In the case of each of the above personal staff objectives, we found that no records existed to monitor the performance against the objective, nor was there a mechanism to do so. This coincided with our earlier finding about the lack of management information available to CCU managers and absence of protocols on the sharing of data and information.

### **We recommend that the UK Border Agency:**

- implement a more formal approach to quality assurance in the CCU.

**General criterion:**

Communication.

**Specific criteria:**

Strategies and plans are communicated throughout the UK Border Agency and to stakeholders.

Staff understand key objectives and values of the UK Border Agency

- 7.16 We found no evidence of the CCU circulating any formal communication plans to ensure that the UK Border Agency and external stakeholders were made aware of or kept up to date with CCU's role.
- 7.17 After interviewing staff, we found that senior managers within the CCU had a vision for the future of the unit. It was however limited to the internal operations e.g. how the CCU would develop, staffing levels and the types of services to be provided. We were unable to ascertain how this vision was linked to the UK Border Agency's overall plans for the CCU.
- 7.18 We have highlighted in this report that LITs local to the CCU (Manchester & Liverpool) are provided with a full 'normal office hours' service whereas all other LITs are not. There did not appear to be any intervention by the CCU management in considering the effect of delivering different services.
- 7.19 We found that some staff considered that the CCU was becoming a switchboard for the UK Border Agency, diverting resources away from their core duties and constantly transferring calls to other parts of the UK Border Agency. This also meant that it was likely that legitimate callers were not getting through because lines were busy.
- 7.20 Whilst we were unable to determine the extent of this, this perception was based on staff experiences of dealing with calls and becoming aware of issues relevant to the unit. For example, staff informed us that the CCU contact number had been used on LITs answering machines during office hours. This activity was challenged by staff and the references were removed from the message. We were also informed that the CCU number was being used as the primary reference for contact when arrangements were being made to remove an individual from the UK, rather than as a back up during out of office hours.
- 7.21 These examples demonstrated that the true role of the CCU was not widely known across the UK Border Agency. More critically, awareness of the CCU's role was not measured within the Unit itself, leaving it with something of an identity crisis.

# Appendix 1

## Inspection 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 Table 1.

**Table 1 – Specific criteria:**

1.1(a)	There are clear and realistic performance targets to drive improvement
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
1.1(d)	There are clear procedures for handling data, including identity management, in accordance with national security and data protection requirements.

1.4 General Criterion: Corporate Health – The UK Border Agency is a high performing, customer-focused workforce delivering its strategic objectives. The specific criteria are shown in Table 2.

**Table 2 – Specific criteria:**

1.4(c)	Resources are focused on priorities.
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### Section 2 – Processes and procedures including quality of decision making and consistency of approach

2.2 General Criterion: Decisions made are fair and consistent. The specific criteria are shown in Table 3.

**Table 3 – Specific criteria:**

2.4(c)	Risks, including protecting the public, are assessed and inform decision making.
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### Section 4 – Management and Leadership

4.1 General Criterion: Effective and motivating leadership. The specific criteria are shown in Table 4.

**Table 4 – Specific criteria:**

4.1(a)	There is evidence of diligent business planning.
4.1(c)	There is evidence that the UK Border Agency is flexible and responsive to changing circumstances.

4.5 General Criterion: There is clarity about an individual's role and purpose. The specific criteria are shown in Table 5.

**Table 5 – Specific criteria:**

4.5(a)	Staff receive appropriate good quality training, including diversity and equality, when it is needed to equip them with the necessary knowledge and skills to enable them to deliver services fairly to customers.
4.5(c)	Performance of all staff is reviewed regularly and improvement plans are in place for those identified as less effective.

4.7 General Criterion: Communication. The specific criteria are shown in Table 6.

**Table 6 – Specific criteria:**

4.7(a)	Strategies and plans are communicated throughout the UK Border Agency and to stakeholders.
4.7(c)	Staff understand key objectives and values of the organisation



# Appendix 2 Staff Survey Results

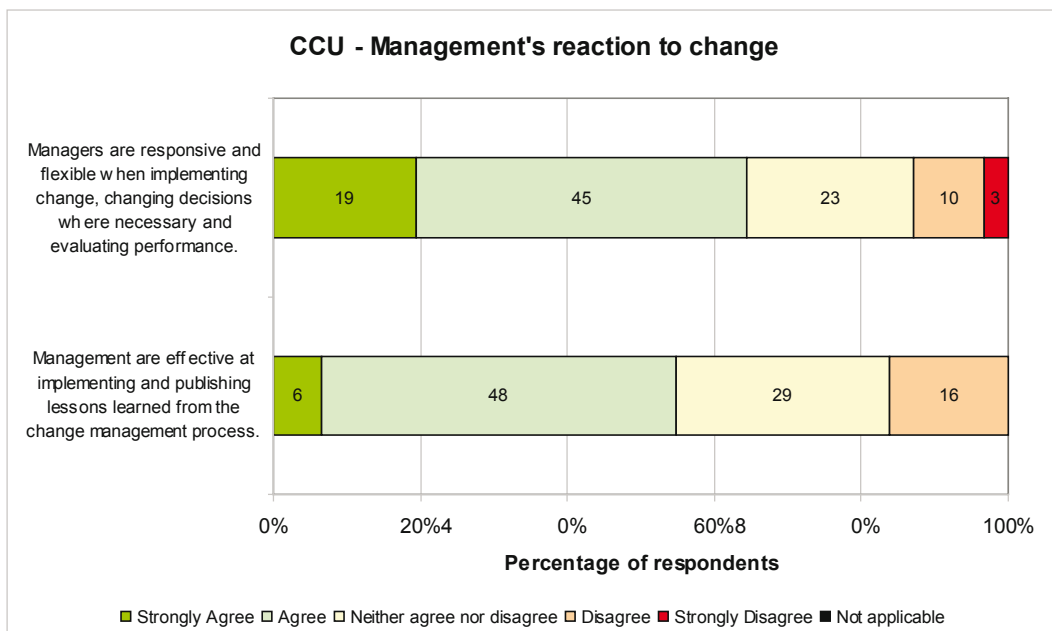
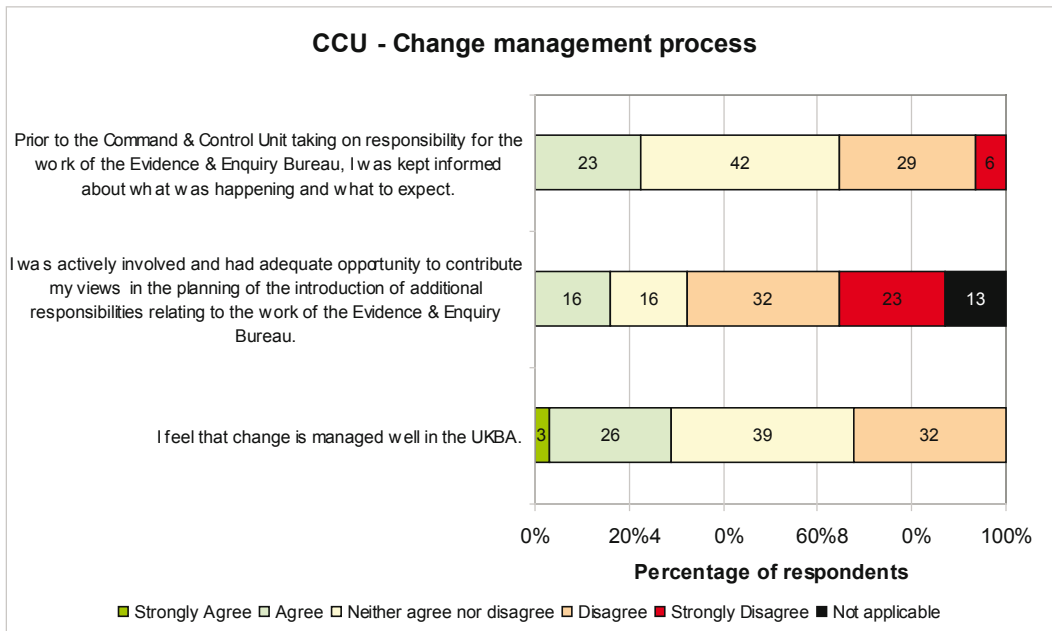
## Methodology

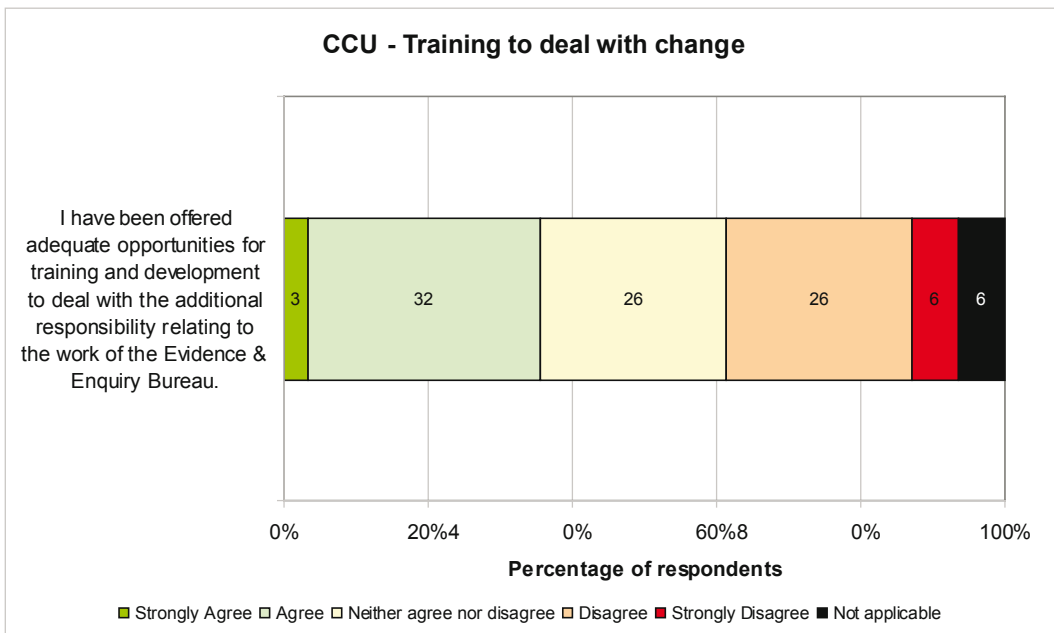
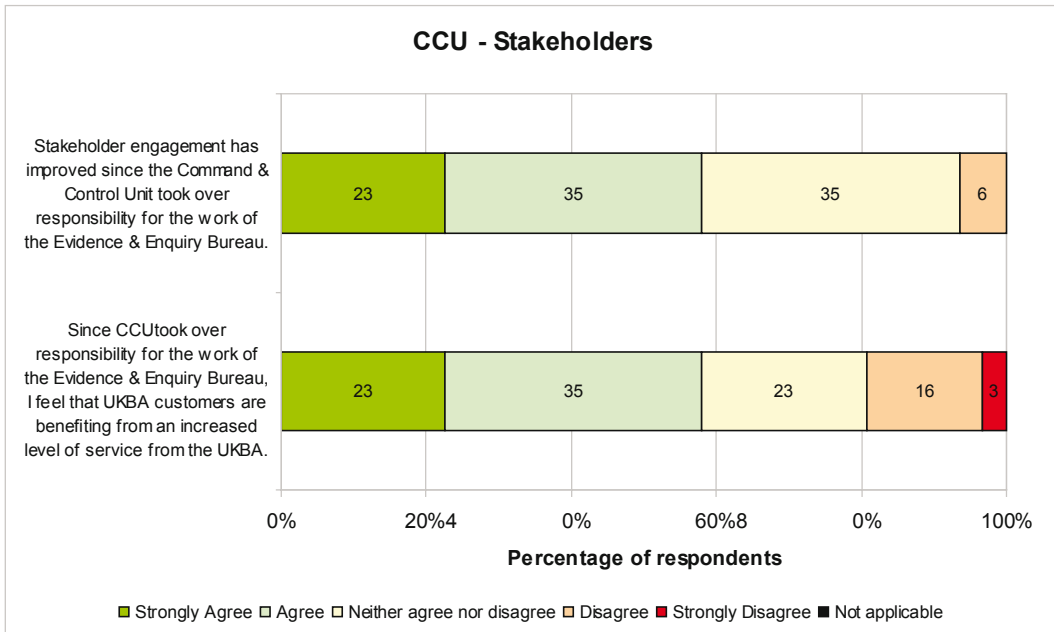
The questionnaire was distributed to staff electronically during March 2010 before the on-site phase of the inspection. The majority of questions were taken directly from the Home Office staff survey as these have been rigorously tested.

Participation in the survey was anonymous and on a voluntary basis.

We received a response rate of approximately 72% (31 responses).

The results of the survey are broken down as follows:





# Appendix 3

## Glossary

Term	Description
Absconder	A term used by the Agency to describe a person who the Agency has lost contact with, who has breached reporting restrictions or bail conditions and/or who they are unable to make contact with via their last known address.
Critical Incident	Any incident where the planning, event, outcome or consequence of that incident is likely to result in: <ul style="list-style-type: none"> <li>• serious harm to any individual;</li> <li>• significant community impact or</li> <li>• a significant negative impact on the confidence of the public in the UK Border Agency</li> </ul>
Data Protection Act 1998	The Data Protection Act requires anyone who handles personal information to comply with a number of important principles. It also gives individuals rights over their personal information.
Her Majesty's Inspector of Immigration (HMI)	The UKBA senior manager primarily responsible for legacy immigration staff.
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.
Independent Police Complaints Commission (IPCC)	The organisation with overall responsibility for the police complaints system in England and Wales.
Immigration Group (IG)	The directorate within the UK Border Agency which is responsible for asylum, enforcement and compliance and nationality.
Judicial Review (JR)	The means through which a person or people can ask a High Court Judge to review the lawfulness of public bodies' decisions.
Local Enforcement Office (LEO)	An office consisting of case workers, reporting centre staff and operational enforcement staff whose role is to remove those with no right to remain in the United Kingdom.
Local Immigration Team (LIT)	A LIT is a local team undertaking as many functions as practicable at a local level in a defined area within a region. LITs will build on the work carried out by the best local enforcement offices but will have a wider remit to encompass community engagement beyond enforcement. They will undertake key enforcement roles in their locality.

Term	Description
Overseas Visitors Records Office (OVRO)	<p>OVRO is a unit of the Metropolitan Police Service which has two main functions;</p> <ul style="list-style-type: none"> <li>• To register all foreign nationals from the countries remaining in the police registration scheme, who reside in the Metropolitan Police District and have a requirement to register with the police imposed in their passport or travel document;</li> <li>• Circulation of Immigration Offenders on the Police National Computer (PNC)</li> </ul>
Performance Development Review (PDR)	The appraisal system used for all staff at Grade 6 or below in the Home Office and the UK Border Agency
POISE	The IT system/platform used by Immigration Group
Police National Computer (PNC)	The PNC holds details of people, vehicles, crimes and property that can be electronically accessed by the police and other criminal justice agencies.
(The) Region	North West
Risk and Liaison Overseas Network (RALON)	An amalgamation of the former Airline Liaison Officer Network and Overseas Risk Assessment Unit Network. RALON has responsibility for identifying threats to the UK border, preventing inadequately documented passengers from reaching UK shores, providing risk assessment to the UKBA visa issuing regime and supporting criminal investigations against individuals and organisations which cause harm to the UK.
Sponsor Licensing Unit	Persons wanting to sponsor a migrant worker or student are required to apply for a licence. The Sponsor Licensing Unit decides all such applications.
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.
United Kingdom Border Force	The directorate within the UK Border Agency responsible for front-line operations.
Warranted Officer	UK Border Agency staff who have powers of arrest for the purpose of dealing with immigration offenders, for example, an Immigration Officer

# Acknowledgements

We are grateful to the UK Border Agency for its help and co-operation throughout the inspection and for the assistance provided in helping to arrange and schedule inspection activity within the Command and Control Unit.

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