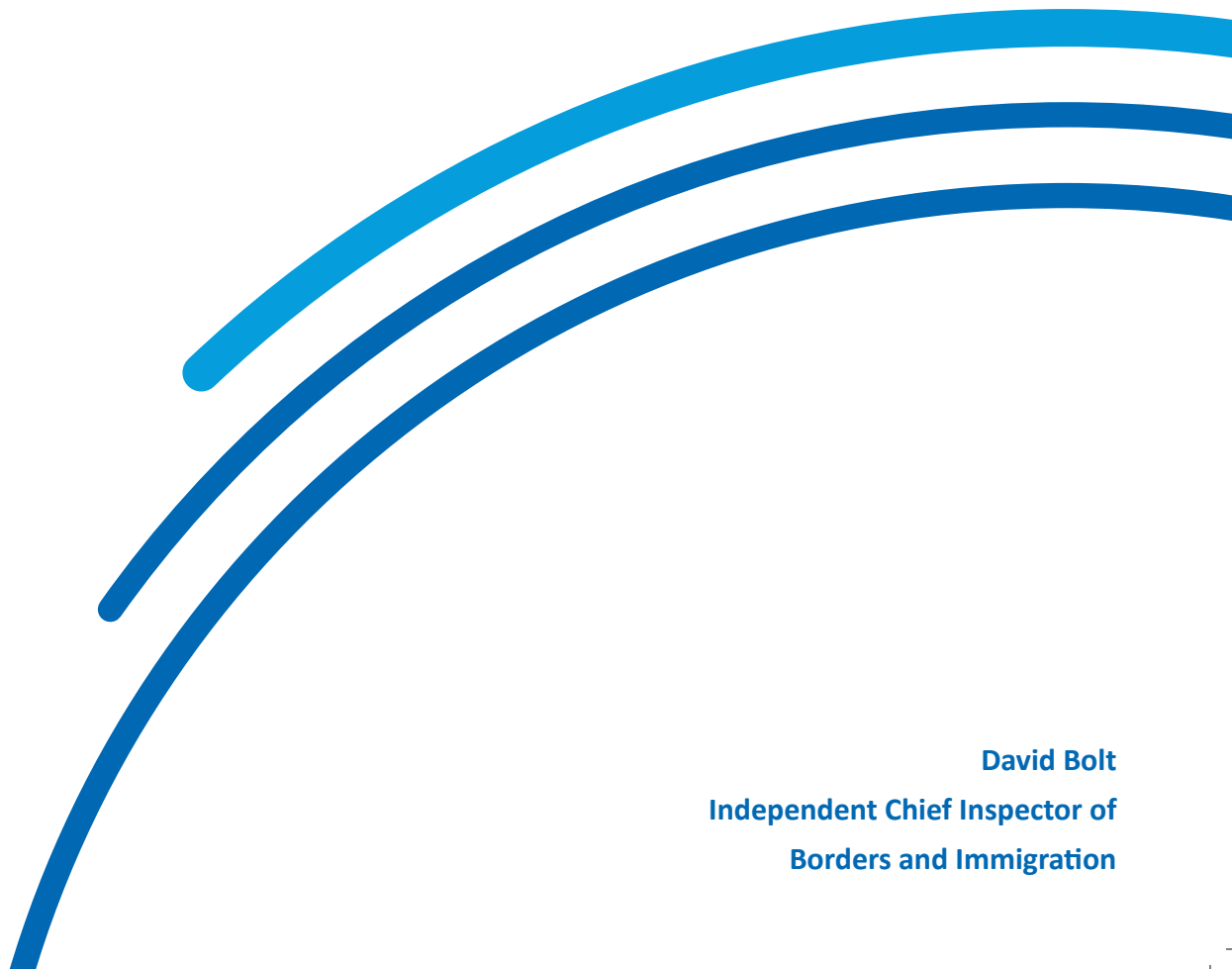




An inspection of Border Force operations at Coventry and Langley postal hubs

March to July 2016



David Bolt
Independent Chief Inspector of
Borders and Immigration

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Foreword

Letters, parcels, packets and other articles (collectively known as ‘postal packets’) that arrive in the UK from overseas by post are forwarded to one of two postal hubs (also known as ‘Offices of Exchange’), where they are processed by the public postal services provider (Royal Mail Group) for onward delivery to the recipient.

The two ‘Offices of Exchange’ are at Coventry (Coventry International Hub) and Langley (Heathrow Worldwide Distribution Centre). Border Force officers are based at these two locations, where they may legally examine postal packets for customs purposes. Border Force performs two main functions at each postal hub: an anti-smuggling function, which involves the detection and seizure of controlled and prohibited items; and a fiscal charging function, which identifies items where duties are owed and levies the appropriate charges.

This inspection examined the efficiency and effectiveness of Border Force operations at the Coventry and Langley postal hubs. It found that, overall, Border Force worked efficiently and effectively at both locations, coping well with the high volumes of postal packets and adapting its risk-based approach to meet the particular circumstances and challenges at each hub.

The scale and time-sensitive nature of postal packet movements, and the legislation governing their handling, demands that Border Force and Royal Mail Group work collaboratively. The inspection found this was the case at an organisational level, where a strong working relationship had been built over time, based on a shared understanding of each other’s objectives and needs, and recognition that each is dependent on the other to achieve these. Both had also worked with Her Majesty’s Revenue and Customs on the introduction of an automated system for fiscal charging (Customs Declaration System CDS) that had created some efficiencies, with more to follow when its use can be extended.

The inspection identified certain areas for improvement. It makes eight Recommendations. Recognising the reliance on the skills and commitment of frontline Border Force officers at both hubs, these include ensuring more and better communication to and with those officers about why some tasks and practices are necessary, the rationale for particular initiatives, and in response to problems when raised.

The report was sent to the Home Secretary on 19 August 2016.

1. Purpose, scope and approach

1.1 The inspection looked at the efficiency and effectiveness of Border Force operations at the postal hubs at Coventry and Langley in meeting its five strategic objectives:

- to deter and prevent goods from entering the UK that would harm the national interest;
- to facilitate the legitimate movement of individuals and trade to/from the UK;
- to protect and collect customs revenues from trade crossing the border;
- to provide excellent service to customers; and
- to provide demonstrable effectiveness, efficiency and value for money.

1.2 It did so by examining:

- processes and adherence to guidance and legislation;
- resource allocation to anti-smuggling and to fiscal functions and operational demand;
- the relationship between Border Force and Royal Mail Group and its impact on operational delivery;
- the post-seizure process, including secure storage, and referral of detections to law enforcement and the outcomes;
- sharing of best working practices between Coventry and Langley;
- intelligence and information flows to, from and within the hubs;
- the impact of new targeting and intelligence methodologies, such as Structured Assessment of Border Risks (SABR) and Advanced Freight Targeting Capability (AFTC).

1.3 Inspectors:

- Examined performance data and documentary evidence, including business plans, staffing information, process guidance and risk registers;
- Sampled 80 Border Force anti-smuggling case files relating to 311 detections made between 1 September 2015 and 29 February 2016;
- Sampled 50 fiscal charging case files (25 from Coventry and 25 from Langley) where the importer had raised a query about the charge imposed¹;
- Conducted onsite visits to Coventry and Langley in May 2016 and spoke with Border Force staff (see figure 1), law enforcement partners and commercial stakeholders, including HM Revenue and Customs, Royal Mail Group and Police.

1 The Border Force system did not enable inspectors to review fiscal charging cases where no query had been raised.

Figure 1: Border Force staff interviewed at Coventry and Langley broken down by grade

Assistant Officer and Officer	35
Higher Officer	9
Senior Officer	4
Deputy Director (Home Office Grade 6)	1
Regional Director (Home Office Grade 5)	1
TOTAL	50

- Attended briefings on new techniques being implemented, such as the Structured Assessment of Border Risks (SABR) project and Advanced Freight Targeting Capability (AFTC).

2. Summary of conclusions

- 2.1 At an organisational level, Border Force and Royal Mail Group enjoy a strong working relationship, built over time. They share a good understanding of each other's objectives and needs, and a recognition that they are mutually dependent. Border Force relies on Royal Mail Group staff to sift '*postal packets*' efficiently and effectively for anti-smuggling examination, fiscal charging, or immediate despatch; while Royal Mail Group relies on Border Force officers to provide customs clearance for packets so that Royal Mail Group can meet its business objectives.
- 2.2 At an operational level, inspectors found that the working relationships at Coventry and Langley were qualitatively different. Where Royal Mail Group employed agency staff this made the building of long-term relationships and trust more difficult. Collaborative working was much more evident at Langley, where some of Royal Mail Group's permanent staff had been provided with additional training and special security passes to allow them to enter the secure customs area.
- 2.3 Overall, the processes in place at both Coventry and Langley Postal Hubs are effective and efficient in supporting Border Force's anti-smuggling and fiscal charging functions. Where Royal Mail Group staff sift packets for immediate despatch, Border Force officers have sufficient opportunities to view and, if necessary, examine them before they leave the premises, although the volumes involved at Langley mean that officers do not view each packet individually.
- 2.4 Border Force operates a '*bulk seizure*' policy at both hubs, detaining goods in a secure storage area pending officers being available to make a formal seizure. Again, this is an efficient and effective way of making more detections and seizures than would otherwise be possible, although officers at both hubs believe that the current method of storing '*bulk seizure*' goods there poses a potential health and safety risk, and is less secure and less efficient than the previous commercial solution. However, '*bulk seizure*' is a departure from Border Force practice elsewhere, and the Home Office was unable to provide evidence that it had been formally authorised by HM Revenue and Customs, who own the policy.
- 2.5 In recent years, the Border Force Postal Command² has achieved significant numbers of detections and seizures, which has prevented drugs, potentially harmful weapons, and counterfeit goods, for example, from entering the UK. However, the proportion of seizures adopted by Police Forces for further investigation and prosecution, where appropriate, is low (less than 1 in 8 referrals were taken forward in 2015/16), and the adoption rate needs to improve to present an effective deterrent to those seeking to exploit '*postal packets*' as a means of importing prohibited or controlled goods.
- 2.6 In relation to fiscal charging, the introduction of an automated Customs Declaration System (CDS) has created some efficiencies, with more expected to follow when its use can be extended. The Home Office has collected data on the number of charges raised and the number of justified customer queries (i.e. where the system has been found to have calculated incorrectly). However, it was too soon to assess the true effectiveness of the CDS' to date, its likely future value, and the resource implications.

² The Home Office refers to Coventry and Langley collectively as the '*Postal Command*'.

- 2.7 Inspectors found that some frontline officers did not understand how seizure and other performance targets were set, or appreciate the strategic importance of Border Force's partnership arrangements with other government departments, such as Her Majesty's Revenue and Customs.
- 2.8 In 2015/16, Border Force at Coventry and at Langley exceeded its seizure targets for most commodities, particularly drugs, in some cases by a significant margin. Some targets were missed, notably firearms at Coventry. The inspection did not look in detail at how targets had been set, but the actual performance calls the accuracy of the process into question. For 2016/17, although year-on-year performance will be monitored, no targets have been set specifically for the postal hubs. This is sensible, and it is more important that Border Force is focused on making effective use of current intelligence than on fulfilling targets that can only ever be indicative.
- 2.9 Officers at Coventry and Langley received threat assessments and intelligence reports. However, the volume of reporting meant that they felt overwhelmed by it, and questioned the relevance and value of much of it to their work. This had been resolved to some extent at Langley by the creation of a 'gatekeeper' role to filter received intelligence, but no such role exists at Coventry. Meanwhile, the flow of intelligence from Coventry and Langley to the 'centre' is poor, except in relation to specific seizures, meaning that knowledge and experience of frontline officers is not being captured.
- 2.10 While managers at Coventry and Langley can say with some confidence that all '*postal packets*' that are 'on check' will have been opened, Border Force does not record how many packets have been opened each day, or which officer opened a particular packet that was then cleared to proceed. Apart from its potential intelligence value, the absence of such data leaves Border Force exposed should it receive any complaints or queries from the public.
- 2.11 Both Coventry and Langley perform risk assurance checks. The Home Office can have more confidence in the risk assurance regime at Coventry, where the Structured Assessment of Border Risk (SABR) pilot has provided some confirmation that officers are selecting those packets that pose the highest risks and that the risk of contraband being missed is low. Although frontline officers are skilled in spotting suspicious packets from those sifted out from examination, the much greater volumes at Langley and smaller Border Force resource carries a greater risk of items not being detected. It is therefore important that Border Force secures the data flow it needs from Royal Mail Group to extend the SABR pilot to Langley as soon as possible.
- 2.12 Border Force provides Royal Mail Group with information about individuals, companies, countries and declared goods of interest, to assist the latter's efficient and effective sifting of '*postal packets*'. Royal Mail Group displays the information on walls for the benefit of its staff doing the sifting³. While this is functional, it is questionable from a security perspective, the more so as the personal information that is included is covered by the Data Protection Act 1998 and, at the time of the inspection, the Home Office did not have a data-sharing agreement in place with Royal Mail Group.
- 2.13 Based on the Staff Engagement Index 'scores', comments made to inspectors, and the latter's observations, Border Force officers at both hubs are motivated and generally engaged. Between 2014 and 2015, there had been a drop in staff engagement at Langley, but Border Force management is aware of the reasons for this (which included limited opportunities for career progression) and some steps have been taken to address them.

³ Following the inspectors' onsite visits, the information was removed from display at Langley, but remained on display at Coventry.

2.14 Key to much of what needs to improve at both hubs is more and better communication to and with frontline officers about why some tasks and practices are necessary; about the rationale for particular initiatives; and in response to problems when raised. Where this had been done, for example providing a full briefing on the SABR pilot, officers understood and were largely supportive, in contrast to those who had not been fully briefed.

3. Summary of recommendations

The Home Office should:

1. Agree with Royal Mail Group a joint action plan to address the negative impact on working relationships of Royal Mail Group's use of agency staff.
2. Ensure that the appropriate authorisation is in place for the continued use by Border Force Postal Command of its *bulk seizure* policy.
3. Explore whether an alternative solution exists for storing goods that have been subject to *bulk seizure* that would reduce the potential health and safety risks associated with the current arrangements.
4. Ensure that information and data relevant to the efficient and effective running of the Postal Hubs at Coventry and Langley, and to Border Force as a whole, is routinely captured and made available to those who need it, including:
 - a. Data on the accuracy of fiscal charges levied through the automated Customs Declaration System (CDS);
 - b. Data on 'postal packets' that are opened and cleared to proceed;
 - c. Information known to or acquired by frontline officers that is relevant to Border Force's understanding of threats but is not currently reported.
5. Ensure that the flow of intelligence to frontline officers at Coventry and Langley is managed, so that officers receive (in good time) only those assessments and reports that are relevant to their work, and are encouraged to provide regular feedback.
6. Work with Police Forces, and other relevant partner agencies, to increase the number of referred detections and seizures that are adopted, investigated and, where appropriate, prosecuted.
7. Ensure that a Data Protection Act 1998 compliant data-sharing agreement with Royal Mail Group is in place (and regularly reviewed) and covers the information shared to assist the sifting of 'postal packets' and Royal Mail Group's handing of such information.
8. Review internal communications at Coventry and Langley and ensure that frontline officers are made fully aware of the rationale for particular Border Force priorities and targets, and of the purpose of any initiatives or pilots.

4. Background

'Postal packets'

- 4.1 Section 27(2) of the Postal Services Act 2011 defines a 'postal packet' as 'a letter, parcel, packet or other article transmissible by post'. 'Foreign postal packets' are defined as:
- any postal packet posted in the United Kingdom and sent to a place outside the United Kingdom; or
 - posted in a place outside the United Kingdom and sent to a place within the United Kingdom; or
 - in transit through the United Kingdom to a place outside the United Kingdom.⁴
- 4.2 To be classed as a 'postal packet', an item must have been carried by a postal services operator providing a public postal service.⁵ 'Postal packets' do not usually have a guaranteed delivery time, and are often the slowest, and cheapest, option.

'Inviolability of the mails'

- 4.3 Under Section 104 of the Postal Services Act 2000⁶, 'postal packets' are subject to the principle of 'inviolability of the mails'. The legislation states:
- (1) Subsection (2) applies to—
- (a) a postal packet,
 - (b) anything contained in a postal packet, and
 - (c) a mail-bag containing a postal packet, which is not the property of the Crown but which is in the course of transmission by post.
- (2) Anything to which this subsection applies shall have the same immunity from—
- (a) examination, or seizure or detention, under a relevant power conferred by virtue of this Act or any other enactment,
 - (b) seizure under distress or in execution,
 - (c) in Scotland, any diligence, and
 - (d) retention by virtue of a lien, as it would have if it were the property of the Crown.
- 4.4 The Secretary of State may, using existing legislation, make amendments to the above if required.

⁴ Postal Services Act 2000, section 105(5), <http://www.legislation.gov.uk/ukpga/2000/26/section/105>

⁵ Postal Services Act 2011, section 27(1) "Postal services" means—

(a) the service of conveying postal packets from one place to another by post,

(b) the incidental services of receiving, collecting, sorting and delivering postal packets, and

(c) any other service which relates to, and is provided in conjunction with, any service within paragraph (a) or (b).

⁶ <http://www.legislation.gov.uk/ukpga/2000/26/section/104>

‘Offices of Exchange’

- 4.5 On arrival in the UK, *‘postal packets’* are sent to one of two *‘Offices of Exchange’*, Coventry (Coventry International Hub) and Langley (Heathrow Worldwide Distribution Centre), where they are processed by the postal services provider for onward delivery to the recipient, and where they can be legally examined by Border Force for customs purposes.⁷
- 4.6 Items are forwarded to Coventry or to Langley on the basis of their weight: items weighing 2.2kg or less go to Langley and are processed by Royal Mail; heavier items go to Coventry, where they are processed by Parcel Force. No sifting or sorting of items for Coventry and Langley takes place in the UK. It relies on internationally recognised codes applied at the time and place of dispatch by the exporting postal administration.
- 4.7 Where a sender (*‘consignor’*) pays a premium to send a *‘postal packet’* with a guaranteed arrival time, usually within 24 or 48hrs, this item is designated as a *‘fast parcel’*. Royal Mail Group *‘premium’* products⁸ go to Coventry. *‘Fast parcels’* sent via other carriers do not go to Coventry or Langley for processing, and if Border Force requires one of these *‘fast parcels’* to be opened this is done by officers at the airport or port of arrival. The inspection did not look at Border Force processes for dealing with *‘fast parcels’*.

‘Power to examine and take account of goods’

- 4.8 Border Force officers conducting customs examinations of *‘postal packets’* use powers drawn from Section 159 of the Customs and Excise Management Act 1979⁹ (CEMA), as amended by The Postal Packets (Revenue and Customs) Regulations 2011, Regulation 7.¹⁰
- 4.9 Section 159 of CEMA covers the *‘power to examine and take account of goods’*:

(1) Without prejudice to any other power conferred by the Customs and Excise Acts 1979¹¹, an officer may examine and take account of any goods—

(a) which are imported; or

(b) which are in a warehouse or Queen’s warehouse; or

(bb) which are in a free zone; or

(c) which have been loaded into any ship or aircraft at any place in the United Kingdom or the Isle of Man; or

(d) which are entered for exportation or for use as stores; or

(e) which are brought to any place in the United Kingdom for exportation or for shipment for exportation or as stores; or

(f) in the case of which any claim for drawback, allowance, rebate, remission or repayment of duty is made;

and may for that purpose require any container to be opened or unpacked.

7 An MoU between Border Force and Royal Mail Group stated that Border Force would not intercept mail items outside of the Offices of Exchange unless they conform to specific exceptions, namely when there would clearly be a danger in allowing goods to move to the Offices Of Exchange. For example, where Border Force officers suspect the goods will be offloaded before reaching the Offices Of Exchange.

8 These have a guaranteed delivery time and may weigh less than 2.2kg.

9 <http://www.legislation.gov.uk/ukpga/1979/2/section/159>

10 <http://www.legislation.gov.uk/uksi/2011/3036/regulation/7/made>

11 As amended by Section 7 of the Postal Packets (Revenue and Customs) Regulations 2011.

(2) Any examination of goods by an officer under the Customs and Excise Acts 1979 shall be made at such place as the Commissioners appoint for the purpose.'

Border Force Operations at Coventry and Langley

- 4.10 Border Force activity at the Coventry and Langley postal hubs is thus governed by legislation.¹² Instructions for how the powers listed above should be executed are set out in the Border Force Enforcement Handbook (sometimes known as 'the Customs Handbook'), and Border Force officers are required to comply with the Enforcement Handbook as well as with relevant legislation.
- 4.11 At the time of the inspection, Border Force had 135 staff deployed at the two postal hubs – 90 at Coventry and 45 at Langley. The workloads at the two hubs were different, reflecting the different types of package (weight and profile) and different volumes. Between 1 April 2014 and 31 March 2015, the Postal Command processed in excess of 600 million items of post (both imported and exported), around 98% of which was processed at Langley and 2% at Coventry.
- 4.12 There are two streams of work for Border Force officers at the postal hubs: anti-smuggling and fiscal charging.
- 4.13 Anti-smuggling work involves Border Force officers examining '*postal packets*' to identify contraband.¹³ The daily volumes of '*postal packets*' make it impracticable for Border Force to examine every one. However, it is able to put packets 'on check' with the postal services operator, so that every '*postal package*' meeting a particular profile is passed to Border Force for examination. Border Force managers determine which profiles to put 'on check' based on the assessment of risk, historical trends, and specific intelligence. At the time of the inspection, officers at Coventry were assisting the Structured Assessment of Border Risk (SABR) programme, which was developing a risk assessment, deployment and testing tool. Although at an early stage, it was hoped the tool would improve the way that arriving items are targeted and analysed.
- 4.14 Fiscal charging work involves Border Force officers examining '*postal packets*' (typically parcels) to assess if there are any import duties payable on the contents. Border Force does this on behalf of Her Majesty's Revenue and Customs. Officers use a computer system called CHIPP to work out the charge, which is then printed out and affixed to the packet. At the time of inspection, 12 Border Force staff at Coventry were responsible for dealing with customer enquiries and refunds relating to fiscal charges raised at Coventry and at Langley.
- 4.15 Border Force's fiscal charging work is conducted on behalf of Her Majesty's Revenue and Customs. At the time of inspection, a new system called Customs Declaration System (CDS) had been implemented at both hubs. The intention is that this automated system will eventually reduce the Border Force resources required to process *postal packets* for fiscal charging purposes.
- 4.16 In addition, Border Force officers at Coventry and Langley are sometimes deployed on other activities, for example to attend courier companies handling '*fast parcels*' to assist where frontline operations at Ports had not been able to examine particular packets.

¹² Including as noted, CEMA 1979, Postal Packets (Revenue and Customs) Regulations 2011, Postal Services Act 2000.

¹³ Items that incur a duty charge that has not been paid, or prohibited and restricted items, such as weapons, tobacco, products of animal origin etc.

Border Force processes

4.17 In addition to adhering to the Border Force Enforcement Handbook, officers at Coventry and Langley are required to comply with the published 'Postal Operating Model'. This 'model' was developed by Border Force to ensure consistency and compliance at the postal hubs. It is split in to seven key areas:

- Pipeline – the routing by which the postal item reached the hub;
- Process – how the postal item was dealt with on arrival at the hub;
- Evidence – ensuring records and evidence were gathered lawfully;
- Post seizure – making referrals to relevant law enforcement and supporting prosecution;
- Exhibit/Storage – ensuring items were handled and stored correctly to prevent misappropriation;
- Correspondence – where required, ensuring refunds were authorised and administered correctly; and
- Intelligence – gathering, sharing and applying intelligence to ensure resources were targeted appropriately.

4.18 However, the different volumes of 'postal packets', weights and different postal service providers at the two locations led to each hub developing its own processes. This is illustrated by the two flow charts (Figures 2 and 3), which show the progress of a 'postal packet' through Coventry and through Langley and the intervention points for Border Force officers.

Figure 2: Flow chart for Border Force process at Coventry postal hub

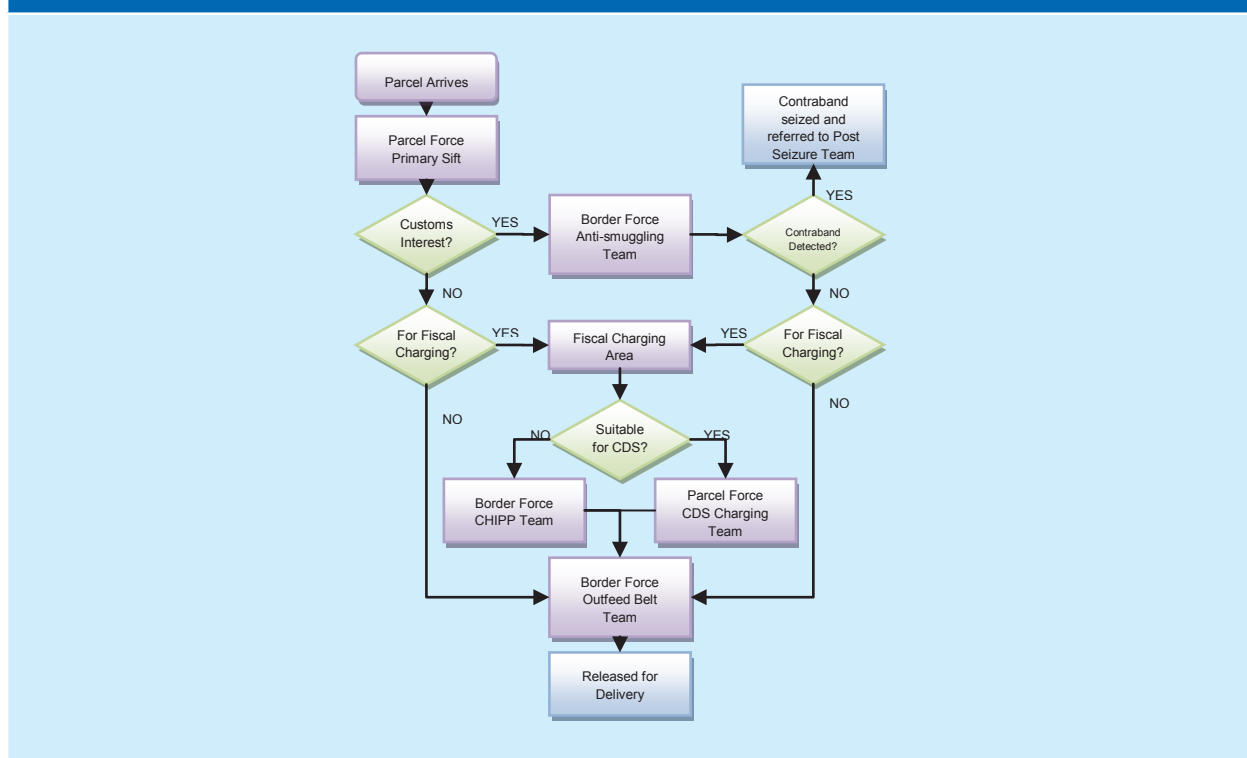
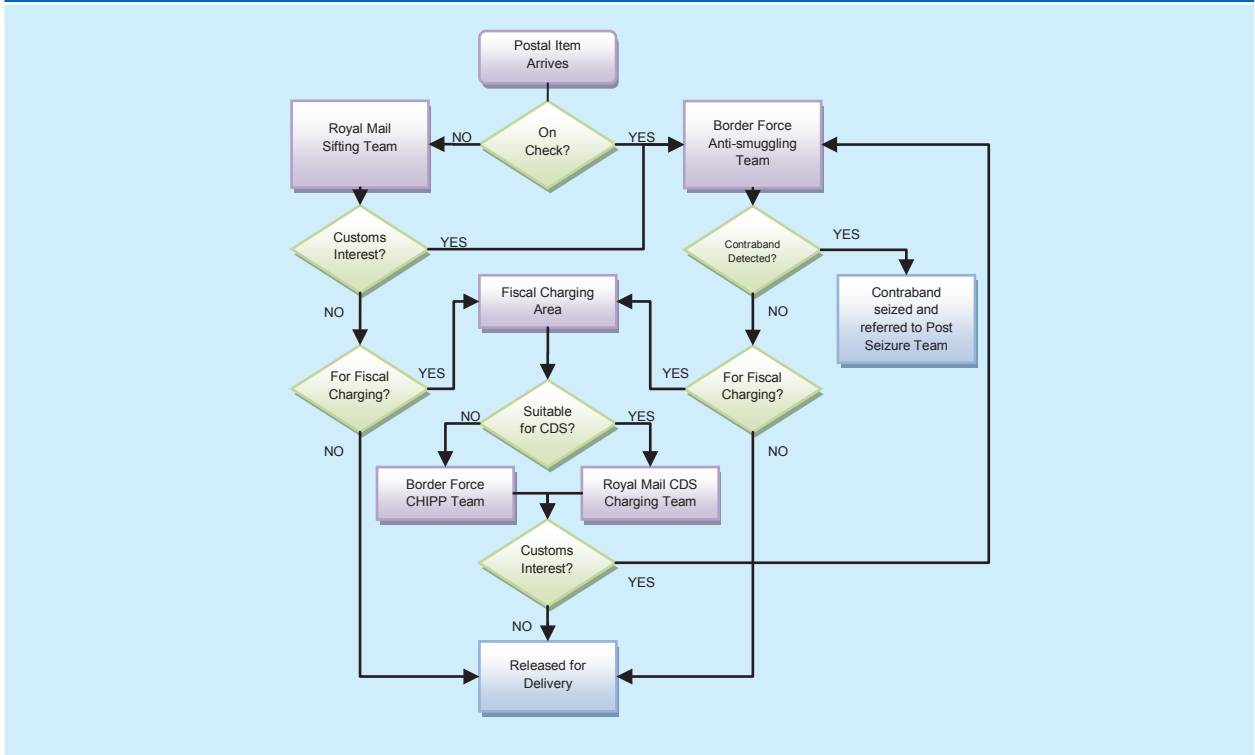


Figure 3: Flow chart for Border Force process at Langley postal hub



5. Inspection findings – partner relationships

Relationships with Royal Mail Group

- 5.1 The relationship between Border Force and Royal Mail Group is key to both parties achieving their business objectives. Royal Mail Group staff perform essential functions for Border Force at both postal hubs, such as triaging '*postal packets*' for examination; Royal Mail Group is not permitted to release '*postal packets*' for delivery without customs clearance, which Border Force provides.
- 5.2 At an organisational level, both Border Force and Royal Mail Group consider their relationship to be strong. Over time, they have developed an understanding of each other's priorities, and now work in close partnership to deliver objectives, including new projects and changes to processes, and to resolve issues.
- 5.3 Both organisations are proud of their collaborative working, which has been strengthened through the Customs Declaration System (CDS) pilot.¹⁴ Border Force senior managers told inspectors that Royal Mail Group responds quickly and effectively to increased threats or changes to Border Force priorities. This was particularly evident in the wake of the terror attacks in Paris and Brussels in November 2015 and March 2016.
- 5.4 At an operational level, at Langley the Border Force Senior Officer and Higher Officers and their counterparts at Royal Mail enjoy a good relationship. Inspectors observed frontline staff from both organisations working together as a team in the anti-smuggling area at Langley, interacting on first-name terms and demonstrating a clear understanding of each other's needs and boundaries.
- 5.5 Both sets of staff attribute this to the validation process Border Force had agreed with Royal Mail Group. Under this process, staff at both sites undertake a test with a pass mark (85%) in order to operate in the anti-smuggling areas. To supplement this, a cohort of permanent Royal Mail staff at Langley were provided with additional training in order to be permitted to work alongside Border Force staff in the restricted area. Those who had received the additional training at Langley and passed the test were provided with a pass that gave them access to the anti-smuggling area, which also acted as a way to demonstrate to Border Force staff that they had passed the relevant training course.
- 5.6 In the fiscal charging area, there is also a small cohort of Royal Mail Group staff, again with specific training and clearance, who are able to operate the CDS. However, access to the fiscal charging area is not restricted, although most Royal Mail staff in that area simply load the relevant packets onto the conveyer belt.
- 5.7 By contrast, Border Force officers at Coventry told inspectors that, although relationships were improving, the routine use of agency staff by Royal Mail Group meant that it was not possible for frontline staff from the two organisations to develop close working relationships. Border Force officers felt that the use of agency staff reduced efficiency, as it was generally left to Border Force to provide 'on the job' training to the agency staff, particularly in the fiscal charging area.

¹⁴ CDS automates the consideration of whether fiscal charging is appropriate based on an assessment of the declared description and value of the packet against charging regulations and risk rules incorporated into the software. See Chapter 6.

- 5.8 Border Force officers also had concerns about the security clearances held by agency staff, particularly as they have access to the anti-smuggling area and can see the intelligence provided to Royal Mail Group and placed on view around the site.
- 5.9 Border Force and Royal Mail Group managers were aware of the security concerns. Royal Mail Group maintain that agency staff are security cleared to the same level as their permanent staff, but recognise that the use of agency staff affects the development of working relationships. However, historically Royal Mail Group has found it difficult to recruit and retain permanent staff, so needs to employ agency staff to meet their objectives. Agency staff also allow for flexible resourcing, which is vital for Royal Mail Group, not least as the workload varies at different times of the year.
- 5.10 Royal Mail Group managers advised inspectors that that they were examining whether it was possible to replicate the validation process in place at Langley for those Royal Mail Group staff who would work closely with Border Force at Coventry.

Relationships with Her Majesty's Revenue and Customs (HMRC)

- 5.11 Her Majesty's Revenue & Customs (HMRC) lead on the legislation, policy and guidance governing Border Force's fiscal charging and duty evasion work. Senior Civil Servants from HMRC and the Home Office meet annually to agree Border Force's fiscal charging and duty evasion targets.
- 5.12 HMRC and Border Force consider they have a strong working relationship and have developed an understanding of their respective priorities and the pressures faced by each. HMRC told inspectors that it was satisfied with Border Force's performance against HMRC targets.
- 5.13 HMRC, Border Force and Royal Mail Group collaborated to introduce CDS, which HMRC sees as a means of reducing 'fiscal leakage'¹⁵, and of freeing up Border Force officers to consider those '*postal packets*' that are more difficult to assess. Border Force also welcomed CDS, but as a way for it to reduce the Border Force resources required for fiscal charging work and to create additional capacity for anti-smuggling work.

Conclusions

- 5.14 At an organisational level, Border Force and Royal Mail Group enjoy a strong working relationship, built over time. They share a good understanding of each other's objectives and needs, and a recognition that they are mutually dependent. Border Force relies on Royal Mail Group staff to sift '*postal packets*' efficiently and effectively for anti-smuggling examination, fiscal charging, or immediate despatch; while Royal Mail Group relies on Border Force officers to provide customs clearance for packets so that Royal Mail Group can meet its business objectives.
- 5.15 At an operational level, inspectors found that the working relationships at Coventry and Langley were qualitatively different. Where Royal Mail Group employed agency staff this made the building of long-term relationships and trust more difficult. Collaborative working was much more evident at Langley, where for example some of Royal Mail Group's permanent staff had been provided with additional training and special security passes to allow them to enter the secure customs area.

¹⁵ 'Fiscal leakage' was a term used by HMRC interviewees to describe parcels or postal packets which should be considered for fiscal charging but are not, most commonly due to the lack of resources to do so.

- 5.16 While the relationship between Border Force and HMRC is strong and supportive, senior managers appeared to have different views about how to redeploy Border Force officers freed up by the roll out of CDS. This presents a potential risk to the relationship and to efficiency and effectiveness going forward.

Recommendations

The Home Office should:

- Agree with Royal Mail Group a joint action plan to address the negative impact on working relationships of Royal Mail Group's use of agency staff.

6. Inspection findings – the processing of ‘postal packets’

Sifting

- 6.1 At Coventry and at Langley ‘postal packets’ are initially sifted by Royal Mail Group staff into one of three categories: referral for anti-smuggling checks; referral for fiscal charging; direct to the loading area for despatch.

Anti-smuggling detections

- 6.2 *Postal packets* sifted for anti-smuggling checks are examined by Border Force officers by X-ray and/or by opening them.¹⁶
- 6.3 According to Border Force’s internal management information¹⁷, between 1 April 2015 and 29 February 2016, Border Force officers in the Postal Command made 17,969 anti-smuggling seizures, of which the majority were items covered by Intellectual Property Rights (IPR), followed by drugs, offensive weapons, firearms, cigarettes and hand-rolling tobacco.
- 6.4 A significant proportion of these seizures were made under what the Home Office refers to as the *bulk seizure* policy. Goods detained under this policy are placed in a secure hold awaiting formal seizure. Formal seizure of goods in the hold takes place often days later, when a small Border Force team is allocated to complete that function.
- 6.5 Bulk seizure items are placed on a wooden pallet and wrapped in film. The pallet is later collected and taken offsite for destruction or storage. Previously, plastic bins were used for storage and transportation. However, the bins contract had lapsed and pallets and film was described as the best ‘workaround’. Officers consider that the bins were better from a health and safety perspective, as goods can be heavy and could fall and injure someone, as well as being more secure, as the bins were hard-sided and could be securely sealed unlike the plastic wrapped pallets, and more efficient, since it takes longer to store goods on pallets.
- 6.6 Border Force officers at Coventry and Langley all agreed that they would not be able to achieve the numbers of seizures they did without applying the *bulk seizure* policy. The latter explained that the ‘policy’ had developed organically, starting with tobacco seizures at Coventry and expanding to include ‘Class C’ drugs at both hubs, and IPR¹⁸ and offensive weapons at Langley.
- 6.7 The *bulk seizure* policy deviates from Border Force practice elsewhere. At most Border Force customs controls, officers seize contraband as soon as it is detected and confirmed to be contraband. Border Force senior managers were clear that ‘*bulk seizures*’ were approved.

¹⁶ Some packages are opened by Royal Mail Group staff for Border Force officers to examine them, while Border Force officers are empowered to open packages themselves and to examine them under S.159 of CEMA, as amended by Postal Packets Revenue & Customs (PPR&C) Regulations 2011.

¹⁷ Internal management information provided by the Home Office. It has not been quality assured to the level of published National Statistics so should be treated as provisional and therefore subject to change.

¹⁸ Where the authenticity of the contents of a package is in doubt, Border Force will contact the Intellectual Property Rights (IPR) holder to ask for confirmation before permitting the package to be delivered. The package is released where authenticity is confirmed or where the rights holder fails to respond.

However, the Home Office was unable to provide any documentary evidence in the form of guidance, operational instructions or other form of authorisation that showed that Postal Command officers were permitted to utilise different practices from the rest of Border Force with regard to seizure.

- 6.8 The work of the Postal Command had previously sat with HMRC, and inspectors were told that HMRC had written and operated a *bulk seizure* policy prior to the work passing to Border Force.

Fiscal charging

- 6.9 *Postal packets* sifted for fiscal charging are examined separately from those for anti-smuggling, although some packets checked and cleared for smuggled goods may be diverted back for fiscal charging by Border Force officers who have identified that a charge is applicable.
- 6.10 Before 1 April 2015, fiscal charging decisions were made exclusively by Border Force officers. The officer would consider whether the declared value of the goods was correct and, if not, whether the actual value meant a fiscal charge should be levied.
- 6.11 Since 1 April 2015, Border Force, HMRC and Royal Mail Group have been trialling the Customs Declaration System (CDS). CDS automates the consideration of whether fiscal charging is appropriate based on an assessment of the declared description and value of the packet against charging regulations and risk rules incorporated into the software. Border Force estimate that the introduction of CDS resulted in an additional 600,000 fiscal charges being levied between 1 April 2015 and 31 March 2016, which when added to the 900,000 charges levied by Border Force officers, equates to nearly 2 million charges.
- 6.12 At the time of the inspection, CDS was being used to process '*postal packets*' from one country only, since sufficiently detailed information is recorded on these packets for CDS to work. The longer-term aim is to roll CDS out more widely, considerably reducing the Border Force resources required for fiscal charging work. Border Force managers understood that some officers would continue to work on fiscal charging, focusing on packets where the risk was greatest, or where the information provided was not detailed enough for CDS to charge accurately, but some would be redeployed to reinforce anti-smuggling work.
- 6.13 Where a fiscal charge is levied, Royal Mail Group retains the packet until the charge has been paid. It also recovers a handling fee payable to Royal Mail Group. Where instructed by the intended recipient, or when it determines that it will not get a response to the notice of the fiscal charge, Royal Mail Group returns the packet to the sender.
- 6.14 Recipients who have paid a fiscal charge may request a refund if they consider the charge to be incorrect based on the fiscal thresholds and rules. Inspectors examined 50 files where a refund had been requested. Six resulted in the original charge being maintained, and 34 resulted in a partial or full refund.¹⁹ The remaining 10 cases were unresolved at the time of inspection.
- 6.15 In all 50 cases, inspectors found that the initial decision to levy a fiscal charge was in line with guidance, based on the information available to Border Force at that time. Where refunds were issued, it was because the recipient provided new information.
- 6.16 Border Force officers believe that the introduction of CDS is a positive development, which ought to free up resources to focus on anti-smuggling work. However, some commented that CDS is not sufficiently reliable. This was mainly due to the packet descriptions being incomplete

¹⁹ Partial or full refunds relate only to the fiscal charge. Border Force will make an ex-gratia payment in line with the handling fee if the information provided on the declaration was such that a fiscal charge ought not to have been raised.

or not precise enough for CDS to assess. The concern was that this would result in less accurate fiscal charges than if charging were carried out manually.²⁰

- 6.17 Border Force officers also thought that any expansion of CDS would reduce their opportunities to handle or view packets, which could reduce the likelihood of making a detection and seizure of contraband. Managers were confident that the use of resources in more targeted anti-smuggling activity would mitigate that risk and deliver an increase in detections.

Observing the ‘outfeed belt’ and ‘floor-walking’

- 6.18 At Coventry, *postal packets* sifted postal packets proceed directly to the loading area travel via a conveyor belt, known to staff as the ‘outfeed belt’. Border Force officers at Coventry reported that observing and handling packets from the ‘outfeed belt’ prior to them being loaded onto lorries for onward delivery gives them the best opportunity to develop their skills in identifying packets which may be of interest.
- 6.19 At Langley, where the volumes of *postal packets* made it impracticable to replicate the Coventry ‘outfeed belt’, officers conduct ‘floor-walking’ examinations, where they view packets held in steel cage trolleys, known as ‘yorks’. Where a packet is of interest, a Border Force officer will instruct a Royal Mail Group employee to transfer the packet to the Border Force anti-smuggling area for further examination.

Record keeping

- 6.20 Whenever a seizure is made, the Border Force officers involved are required to record the detection and seizure in their personal notebooks and in the administrative database, Centaur.
- 6.21 Inspectors reviewed 80 personal notebooks and found that in 73 cases the relevant information had been captured, although in seven of these cases there were some minor non factual errors. However, in five cases there were no notebooks available to review, and in two cases notebooks did not comply with guidance.²¹
- 6.22 Inspectors also examined the corresponding 80 Centaur records. While these captured the required information, in 56 cases the time the seizure was made was not recorded accurately, largely because officers had not updated the default time provided by Centaur when a case was entered.²²

Post-seizure

- 6.23 Both Coventry and Langley have robust and secure storage procedures in place for seized items. At both hubs, the Post-seizure Units had implemented rigorous measures for ensuring an auditable record is made of goods stored or removed from secure storage, and of anyone who enters the storage area.
- 6.24 Staff at all grades were proud of the work that had been undertaken, although some did remark on the health and safety risks associated with manual handling and with the smell from seized tobacco and drugs. Border Force had mitigated those risks by providing a DVD outlining the basics of manual handling and by ensuring officers working in the storage area were frequently rotated.

²⁰ Inspectors were not made aware until after the inspection was completed that the Home Office collected data in respect of the number of charges raised and the number of justified customer queries (i.e. where the system has been found to have calculated incorrectly), and therefore the concerns expressed about the accuracy of CDS charging were not tested.

²¹ Two did not comply with notebook completion guidance, namely that mistakes must be crossed through and initialled, entries must be legible, timed and dated and form a contemporaneous record of events.

²² Legally, the date on the Notice of Seizure issued by Border Force is important. Individuals have one calendar month from the date of the Notice of Seizure to lodge an appeal.

- 6.25 The Post-seizure Units are also responsible for referring items of interest to law enforcement partners. They produce an Immediate Event Notification (IEN) which is sent to the International Crime Team (ICT) at the National Crime Agency (NCA). The ICT records the IEN and ensures it is forwarded to the relevant Police Force²³ to consider further action.
- 6.26 Between 1 April 2015 and 31 March 2016, the Border Force Postal Command referred 6,999 seizures to the ICT. Of these, 807 (12%) were adopted by Police Forces, almost half of which related to firearms and the remainder to a range of drugs and banned substances. The Home Office did not hold any data on whether the adopted cases resulted in any enforcement action, including prosecution.

Conclusions

- 6.27 Overall, the processes in place at both Coventry and Langley Postal Hubs are effective and efficient in supporting Border Force's anti-smuggling and fiscal charging functions. Where Royal Mail Group staff sift packets for immediate despatch, Border Force officers have sufficient opportunities to view and, if necessary, examine them before they leave the premises, although the volumes involved at Langley mean that officers do not view each packet individually.
- 6.28 Border Force operates a '*bulk seizure*' policy at both hubs, detaining goods in a secure storage area pending officers being available to make a formal seizure. Again, this is an efficient and effective way of making more detections and seizures than would otherwise be possible, although officers at both hubs believed that the current method of storing '*bulk seizure*' goods there poses a potential health and safety risk, and is less secure and less efficient than the previous commercial solution. However, '*bulk seizure*' is a departure from Border Force practice elsewhere, and the Home Office was unable to provide evidence that it had been formally authorised by HM Revenue and Customs, who own the policy.
- 6.29 In recent years, the Border Force Postal Command²⁴ has achieved significant numbers of detections and seizures, which has prevented drugs, potentially harmful weapons, and counterfeit goods, for example, from entering the UK. However, the proportion of seizures adopted by Police Forces for further investigation and prosecution, where appropriate, is low (less than 1 in 8 referrals were taken forward in 2015/16), and the adoption rate needs to improve to present an effective deterrent to those seeking to exploit '*postal packets*' as a means of importing prohibited or controlled goods.
- 6.30 In relation to fiscal charging, the introduction of an automated Customs Declaration System (CDS) has created some efficiencies, with more expected to follow when its use can be extended. However, the Home Office has collected limited data on the accuracy of charges levied in this way, making it difficult to assess the true effectiveness of CDS to date and its likely future value, which is necessary for informed resource planning.

²³ Typically, the Police Force covering the address of the intended recipient

²⁴ The Home Office refers to Coventry and Langley collectively as the '*Postal Command*'

Recommendations

The Home Office should:

- Ensure that the appropriate authorisation is in place for the continued use by Border Force Postal Command of its *bulk seizure* policy.
- Explore whether an alternative solution exists for storing goods that have been subject to *bulk seizure* that would reduce the potential health and safety risks associated with the current arrangements.
- Ensure that data on the accuracy of fiscal charges levied through the automated Customs Declaration System (CDS) is routinely captured and made available to those who need it.
- Work with Police Forces, and other relevant partner agencies, to increase the number of referred detentions and seizures that are adopted, investigated and, where appropriate, prosecuted.

7. Inspection findings – use of intelligence and risk management

Control strategy and risk assessments

- 7.1 At the time of inspection, Border Force had a risk-based ‘Control Strategy’ in place, which provided ‘a framework in which each of the many different Border Force responsibility areas can be effectively assessed and prioritised, in order to assist in decision-making processes and resource allocation.’²⁵
- 7.2 Border Force’s Control Strategy is linked to the Multi-Agency National Border Security Assessment (NBSA)²⁶ and ‘Border Force Annual Threat Assessment’²⁷ (BFATA), plus other risk assessment documents produced by law enforcement partners.
- 7.3 The Control Strategy divides the threats Border Force seeks to combat into 27 thematic areas, such as alcohol, cash, cigarettes, firearms etc. It further sub-divides into 11 modes of arrival, for instance air freight, containers, fast parcels and post etc. Each theme is given an overall harm rating (‘very low’, ‘low’, ‘medium’, ‘high’, ‘very high’), with each sub-division given its own individual harm rating.

Performance targets

- 7.4 Each Control Strategy theme has its own annual detection targets, which take account of detections made in previous years and any commitments agreed with partners, including HM Revenue and Customs (HMRC), the Department for the Environment, and Food and Rural Affairs (DEFRA). The targets and performance for 1 April 2015 to 31 March 2016 for Coventry and Langley are set out in Figure 4.

Figure 4: Performance targets in the Postal Command

Commodity	Coventry			Langley			Combined % Met
	Target	Actual	% Met	Target	Actual	% Met	
High Risk Class A Drugs - Heroin & Cocaine	46 kgs	67.22 kgs	146%	2 kgs	2.22 kgs	111%	145%
Other Class A Drugs	25 kgs	62.95 kgs	252%	None	56.03 kgs	N/A	476%
Cannabis	1,454 kgs	1,972 kgs	136%	15.00 kgs	37.84 kgs	252%	137%
Other Class B / Class C Drugs	1,166 kgs	3,471 kgs	298%	None	0	N/A	298%

25 Internal Home Office Publication
 26 Led by the National Crime Agency
 27 Internal Home Office Publications

Newly Banned Substances	71.88 kgs	197.77 kgs	275%	12.00 kgs	7.29 kgs	61%	244%
Cutting Agent ²⁸	None	524.88 kgs	N/A	None	0	N/A	N/A
MHRA ²⁹ Medicine	None	852,751 units	N/A	None	561,015 units	N/A	N/A
Firearms (excluding ammunition)	1,636 units	739 units	45%	500 units	511 units	102%	59%
Offensive Weapons	948 units	1,024 units	108%	3,000 units	5,217 units	174%	158%
Cigarettes ³⁰	13.5m units	18.35m units	136%	13.5m units	13.65m units	101%	119%
Hand rolling Tobacco (HRT)	30 tonnes	20.75 tonnes	69%	4.98 tonnes	2.74 tonnes	55%	67%
CITES ³¹	29 seizures	20 seizures	69%	100 seizures	188 seizures	188%	161%
Products of Animal Origin (POAO)	150 seizures	48 seizures	32%	None	15 seizures	N/A	42%
Obscene or Indecent Material	None	12 seizures	N/A	None	1 seizure	N/A	N/A
Forgeries ³²	None	24 seizures	N/A	12 seizures	6 seizures	50%	250%
Intellectual Property Rights infringement (IPR)	6,000 items	6,407 items	107%	6,000 items	6,137 items	102%	105%
Cash	None	£5	N/A	None	£4,500	N/A	N/A

7.5 Inspectors found that local managers ensured that each hub *played to its strengths* as well as being innovative in meeting their targets by dividing targets according to the individual hubs' strengths based on previous performance. Border Force officers at Coventry and Langley believed that the targets affect how they are deployed. However, Postal Command senior managers said that although inter-agency targets could be more of a priority towards year-end, they decide on resource deployments based on the assessed threats.

28 A chemical used to dilute recreational drugs with something less expensive

29 Medicines and Healthcare Products Regulatory Agency

30 The precise seizure figures were: Coventry 18,357,888 cigarettes, and Langley 13,650,282

31 Convention on International Trade in Endangered Species of Wild Fauna and Flora

32 Forgeries of official documentation, such as passports, driving licences, certificates etc.

7.6 Inspectors were told that, while local managers will still measure performance against previous levels, there will be no regional or local targets for 2016/17, or any specifically for the Postal Command. Instead, targets will be for Border Force as a whole to meet.

Intelligence

7.7 Border Force Intelligence Directorate has oversight and control of all intelligence and targeting functions within Border Force. This includes a *fast parcels* targeting function, which at the time of the inspection had recently started exploring other ways to examine postal items. A Postal Intelligence Team, comprising three officers, is based at Coventry.

7.8 Alongside strategic intelligence functions, Border Force intelligence teams gather, research and disseminate intelligence on trends and emerging threats to the frontline teams in order to inform target selection. The effectiveness of this process is dependent on input and feedback from the frontline teams.

7.9 Border Force officers making a detection above a set limit are required to complete an Immediate Event Notification (IEN) and/or Seizure Notice. These documents contain all the details of the detection, and are circulated to law enforcement agencies and to Border Force intelligence teams.

7.10 The Border Force Intelligence team with responsibility for the postal command told inspectors that while Notifications/Notices resulting from seizures were important they were not sufficient on their own. The teams believe they are not routinely receiving other relevant information from frontline officers. Figure 5 confirms that only four reports not directly related to a seizure were submitted in the first six months of 2016.

Figure 5: Notifications/notices and other information received by intelligence teams – 1 January 2016 to 1 June 2016

Type of referral	Coventry	Langley
Notifications/Notices of a seizure of prohibited or restricted goods	659	323
Other Referral not as a result of a seizure – e.g. general information, intelligence or trend identification	4	0

7.11 Frontline officers told inspectors that they rely on their own experience and knowledge of previous detections. While the dedicated Fast Parcels/Postal Intelligence team provides timely, accurate and useful intelligence, frontline officers are frustrated with the amount of ‘regurgitated’ information they receive.

7.12 The volumes of intelligence sent to frontline officers is a problem. They received a large quantity of intelligence every shift, and often have no time to read it. One officer remarked that they ‘received a new postcode of interest every day’. At Langley, a ‘gatekeeper’ monitors incoming intelligence and disseminates only the items of use to frontline officers, storing the remainder in an accessible library. There is no such role at Coventry.

Selection of items for examination

- 7.13 At Coventry and at Langley, Border Force is able to place *postal packets* meeting certain profiles 'on check', so that Royal Mail Group directs all such packets to Border Force for examination. Senior managers at each hub decide on the profiles to place 'on check', informed by various factors including received intelligence, trend analysis, targets, and seizures.
- 7.14 Border Force Officers must justify their selection of a packet for examination. Where a packet is 'on check' this is sufficient justification. Where this is not the case, for example where an officer selects a packet from the 'outfeed belt' at Coventry or from a 'york' at Langley, officers did not record their reasons for justification in any form, unless a detection of contraband was made.

Data sharing with Royal Mail Group

- 7.15 At both postal hubs, Border Force provides Royal Mail Group with information to help it better support Border Force's anti-smuggling and fiscal charging work. This information includes the names of importers and exporters, declared items, and countries of interest to Border Force. Inspectors observed that Royal Mail Group employees were placing this information on general view within the sorting areas of the hubs to help their staff to identify items of interest to Border Force officers.
- 7.16 The information being shared includes personal details, such as names and addresses of individuals of interest to Border Force, to which the Data Protection Act 1998 applies. However, at the time of the inspection, there appeared to be no formal data sharing agreement in place between Border Force and Royal Mail Group.

Structured Assessment of Border Risks

- 7.17 In January 2014, Border Force created the Structured Assessment of Border Risk (SABR) team. SABR's aim is to develop a method for quantifying the flow of controlled items into the UK through statistical analysis, so that Border Force resources can be more effectively targeted.
- 7.18 At the time of inspection, the SABR team had piloted its approach at the Coventry postal hub. Initial findings indicated that the approach had merit, and confirmed that officers at Coventry are selecting packets that pose the highest risks. However, the officers at Coventry had concerns about the effort and resource required for the pilot. Senior managers told inspectors that the total resource requirement equated to two members of staff for the period of testing and, at the time of inspection, an external recruitment campaign was underway to recruit two staff specifically for that purpose.
- 7.19 In the longer term, Border Force envisages that the SABR process will work alongside other electronic targeting systems. At the time of the inspection, Border Force wished to begin a full SABR pilot at Langley. However, it had not been able to do so because Royal Mail Group had yet to provide the flow data needed for this.

Routine risk assurance at the postal hubs

- 7.20 Border Force conducts routine risk assurance checks at both postal hubs to test that the processes in place to route packets for examination are working as intended. The SABR pilot provided an additional layer of assurance, since it involved testing 'low risk' packets that would not normally have been examined.

- 7.21 At Coventry, a Border Force officer covers the belt for *'postal packets'* that are being loaded for delivery. However, if the officer removes a packet to examine it, some packets may not be viewed while the examination is in progress.
- 7.22 At Langley, risk assurance is more of a challenge due to the volumes of *'postal packets'*, comprising mostly unregistered letters and small items. This requires Border Force to take a different approach. Twice in a shift, a Border Force officer walks around the *'yorks'* waiting to be sent out to delivery offices, and looks for anything suspicious. Each *'york'* can contain hundreds of postal packets, and at any one time there may be over 100 *'yorks'* awaiting delivery.
- 7.23 Inspectors observed this process. The Border Force officer selected several items from the *'yorks'*, and returned to the customs screening area with them. When the packets were x-rayed, several were found to contain contraband, including tobacco and offensive weapons.

Advanced Freight Targeting Capability (AFTC)

- 7.24 At the time of the inspection, Border Force was in the early stages of developing a new computer system for advanced targeting of freight arriving in the UK. It was envisaged that the Advanced Freight Targeting Capability (AFTC) would interact with existing systems, and use data Border Force already held, to provide real-time, threat-based targeting. Border Force hoped this would ultimately be possible across all modes of transport and told inspectors that a significant amount of work was being done with partners to secure the necessary data feeds.

Conclusions

- 7.25 Inspectors found that some frontline officers did not understand how seizure and other performance targets were set, or appreciate the strategic importance of Border Force's partnership arrangements with other government departments, such as Her Majesty's Revenue and Customs.
- 7.26 In 2015/16, Border Force at Coventry and at Langley exceeded its seizure targets for most commodities, particularly drugs, in some cases by a significant margin. Some targets were missed, notably in relation to firearms at Coventry. The inspection did not look in detail at how targets had been set, but the actual performance calls the precision of the process into question. For 2016/17, although year-on-year performance will be monitored, no targets have been set specifically for the postal hubs. This is sensible, and it is more important that Border Force is focused on making effective use of current intelligence than on fulfilling targets that can only ever be indicative.
- 7.27 Officers at Coventry and Langley received threat assessments and intelligence reports. However, the volume of reporting meant that they felt overwhelmed by it, and questioned the relevance and value of much of it to their work. This had been resolved to some extent at Langley by the creation of a *'gatekeeper'* role to filter received intelligence, but no such role exists at Coventry. Meanwhile, the flow of intelligence from Coventry and Langley to the *'centre'* is poor, except in relation to specific seizures, meaning that knowledge and experience of frontline officers is not being captured.
- 7.28 While managers at Coventry and Langley can say with some confidence that all *'postal packets'* that are *'on check'* will have been opened, Border Force does not record how many packets have been examined each day, or which officer opened a particular packet that was then cleared to proceed. Apart from its potential intelligence value, the absence of such data leaves Border Force exposed should it receive any complaints or queries from the public.

- 7.29 Both Coventry and Langley perform risk assurance checks. The Home Office can have more confidence in the risk assurance regime at Coventry, where the Structured Assessment of Border Risk (SABR) pilot has provided some confirmation that officers are selecting those packets that pose the highest risks and that the risk of contraband being missed is low. Although frontline officers are skilled in spotting suspicious packets from those sifted out from examination, the much greater volumes at Langley and smaller Border Force resource carries a greater risk of items not being detected. It is therefore important that Border Force secures the data flow it needs from Royal Mail Group to extend the SABR pilot to Langley as soon as possible.
- 7.30 Border Force provides Royal Mail Group with information about individuals, companies, countries and declared goods of interest, to assist the latter's efficient and effective sifting of '*postal packets*', which Royal Mail Group displays for the benefit of its staff doing the sifting.³³ While this is functional, it is questionable from a security perspective, the more so as the personal information that is included will be subject to the Data Protection Act 1998 and, at the time of the inspection, the Home Office did not have a data-sharing agreement in place with Royal Mail Group.

Recommendations

The Home Office should:

- Ensure that information and data relevant to the efficient and effective running of the Postal Hubs at Coventry and Langley, and to Border Force as a whole, is routinely captured and made available to those who need it, including:
 - Data on '*postal packets*' that are opened and cleared to proceed;
 - Information known to or acquired by frontline officers that is relevant to Border Force's understanding of threats but is not currently reported.
- Ensure that the flow of intelligence to frontline officers at Coventry and Langley is managed, so that officers receive (in good time) only those assessments and reports that are relevant to their work, and are encouraged to provide regular feedback.
- Ensure that a Data Protection Act 1998 compliant data-sharing agreement with Royal Mail Group is in place (and regularly reviewed) and covers the information shared to assist the sifting of '*postal packets*' and Royal Mail Group's handing of such information.

³³ Following the inspectors' onsite visits, the information was removed from display at Langley, but remained on display at Coventry.

8. Inspection findings – staff engagement

People survey

- 8.1 The Home Office runs an annual ‘People Survey’ in order to measure staff engagement.³⁴ All Home Office staff are eligible to participate in the Survey, and the results are gathered and analysed to produce a ‘Staff Engagement Index’, which measures ‘*pride, advocacy, attachment, inspiration and motivation*’ using a five-point scale.³⁵ The Staff Engagement Index is the average engagement score in the organisation, or selected sub-group.

Staff engagement in the postal command

Figure 6: Staff engagement Index

Location	Engagement index	
	2014	2015
Coventry	41%	52%
Langley	74%	58%
Border Force Central Region ³⁶	49%	45%
Border Force (all)	44%	40%

- 8.2 Border Force officers at Coventry told inspectors that morale and staff engagement had improved significantly over the previous 12 months, which they attributed largely to strong, proactive senior managers and an increase in the number of opportunities for career progression and personal development available. This was borne out in Engagement Index scores.
- 8.3 Despite the higher engagement index score, inspectors found that officers at Langley appeared less engaged than their colleagues at Coventry. The former cited a lack of opportunities, insufficient staffing and a recent change in roster as reasons why engagement had dropped since 2014.
- 8.4 Senior managers were initially surprised that inspectors had perceived officers at Coventry as being more engaged than those at Langley. They also cited the engagement work that had been done at Coventry, the roster changes, and absence of a permanent Border Force Senior Officer at Langley. They were hopeful that the recent appointment of a permanent Senior Officer at Langley would help to improve staff engagement.

³⁴ The ‘Cabinet Office Technical Guide to the People Survey’ defines staff engagement as ‘a workplace approach designed to ensure that employees are committed to their organisation’s goals and values, motivated to contribute to organisational success, and are able at the same time to enhance their own sense of well-being.’

³⁵ Strongly disagree = 0; Disagree = 25; Neither agree nor disagree = 50; Agree = 75; Strongly agree = 100.

³⁶ Coventry and Langley are both geographically located in Border Force Central Region.

Communication

- 8.5 Frontline officers told inspectors that often they did not understand the reasons for new initiatives and projects, although they carried them out to the best of their abilities.
- 8.6 Some frontline officers at Coventry had recently had a briefing session about SABR, and reported that they now had a better understanding of the reasons for the project, and although it was taking up frontline resources it would be a worthwhile addition to Border Force. Others who had not had the briefing, and were not aware of the project's wider aims or the key role Coventry was playing in the initial assessment of SABR, considered it a drain on resources and detrimental to core business.
- 8.7 Officers repeatedly told inspectors that other Border Force frontline teams were 'taking' their Class A seizures, intercepting '*postal packets*' and making large detections at the port of arrival. Officers saw this as impacting on their performance against the targets, and believed that Border Force staff at ports of entry were using postal hubs intelligence to increase their own detections.
- 8.8 Senior managers explained that Border Force Postal Command targets were set in the knowledge that some detections and seizures from '*postal packets*' will take place at ports and airports. Although this explanation is perfectly acceptable, it has clearly not been communicated in a way that all staff can understand, leaving the postal command teams feeling that they are being undermined by colleagues elsewhere.

Career progression

- 8.9 There are proportionately more Border Force Assistant Officers in the Postal Command than elsewhere across Border Force, largely dictated by the nature of the work. This creates good opportunities for Border Force Officers (the next higher grade) to demonstrate line management abilities and to take on responsibility, but it presents few chances for the Assistant Officers to gain promotion without moving on elsewhere.
- 8.10 Senior managers are alert to this issue, and told inspectors that they try to provide as many opportunities as possible for staff at Assistant Officer grade, but accept that there are limited promotion prospects within the Postal Command. Managers felt that the Postal Command offers a good entry point into Border Force and, although the loss of experienced Assistant Officers to other locations is not ideal, career progression opportunities are available and staff are fully supported if they wish to move on.
- 8.11 Inspectors were told of a career development opportunity that had been advertised and then withdrawn. This related to immigration control training for staff at Langley. The handling of this had had a negative effect on morale, and officers were now less inclined to apply for other opportunities, fearing that these too might be withdrawn. Managers explained that an unexpectedly high number of officers had applied, and it had not been possible to honour all of the requests without damaging operational effectiveness.

Conclusions

- 8.12 Based on the Staff Engagement Index 'scores', comments made to inspectors, and the latter's observations, Border Force officers at both hubs are motivated and generally engaged. Between 2014 and 2015, there had been a drop in staff engagement at Langley, but Border Force management is aware of the reasons for this (which include limited opportunities for career progression) and some steps have been taken to address them.

- 8.13 Key to much of what needs to improve at both hubs is more and better communication to and with frontline officers: about why some tasks and practices are necessary; about the rationale for particular initiatives; and in response to problems when raised. Where this had been done, for example providing a full briefing on the SABR pilot, officers understood and were largely supportive, in contrast to those who had not been fully briefed.

Recommendations

The Home Office should:

- Review internal communications at Coventry and Langley and ensure that frontline officers are made fully aware of the rationale for particular Border Force priorities and targets, and of the purpose of any initiatives or pilots.

Appendix 1: Role and remit of the Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on her behalf.

The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions. However, functions exercised at removal centres, short-term holding facilities and under escort arrangements are excepted insofar as these are subject to inspection by Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectors of Constabulary (and equivalents in Scotland and Northern Ireland).

The legislation directs the Independent Chief Inspector to consider and make recommendations about, in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on section 19D of the Race Relations Act 1976 (c. 74) (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to her in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which she has committed to do within eight weeks of receipt, subject to both Houses of Parliament being in session. Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

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