



An inspection of the Risk and Liaison Overseas Network (RALON) in Islamabad and the United Arab Emirates

January – April 2010

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Independent Chief Inspector of the UK Border Agency



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Foreword from John Vine CBE QPM



This is one of three inspection reports which together provide a comprehensive assessment of the efficiency and effectiveness of the entry clearance operations in the United Arab Emirates, Pakistan and the UK Visa Section.

The UK Border Agency's role in protecting the UK border means that it is vital that the Agency has the capacity to identify and take action in response to threats to the border before they reach the UK.

The Risk and Liaison Overseas Network (RALON) was created in October 2008 by amalgamating the overseas Airline Liaison Officer and Risk Assessment Unit Networks.

While there are, in my view, clear potential benefits from merging these two previous networks, there are also significant challenges to be overcome. In particular, there needs to be a greater understanding of the importance of the proper use of intelligence. I am concerned that staff are not sharing or using intelligence appropriately. This could potentially impact on the integrity of the intelligence and the credibility of the Agency, and also put at risk the sources and subjects of their intelligence.

I found that inadequate training and inconsistent guidance prevented RALON staff from developing their new role and it was clear from my inspection that RALON's expanded focus, as part of the Border Intelligence Service, is not fully understood by many of the staff we spoke to. More needs to be done to effectively communicate what this change means for staff in terms of their day to day work.

However, it is pleasing to note that despite the challenges faced by RALON during the transformation programme, a number of significant achievements have been made. These include continuing to exceed its denied boarding target and developing and maintaining effective relationships with partners to help the Agency meet its strategic objective of protecting the border. This is impressive given the often difficult circumstances that staff work in.

Effective flows of intelligence are vital to the wider work of the UK Border Agency. I have made a number of recommendations which should also be applicable to RALON's operations elsewhere in the world and will help the UK Border Agency achieve the objective of developing a fully integrated intelligence function by 2011.

A handwritten signature in black ink that reads 'John Vine' followed by a period.

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1. Executive Summary

1. Risk and Liaison Overseas Network (RALON) staff in Islamabad and the United Arab Emirates were enthusiastic and committed. There was evidence of good team work and morale in the team appeared to be high. There were strong partner relationships, in particular with airlines, banks and some local partners, such as the Higher Education Commission in Pakistan. This had helped RALON support the visa operation in tackling the high volumes of abuse in respect of visa applications and to exceed its target of denying boarding to 90% of inadequately documented passengers.
2. RALON had clear performance targets that flowed directly from the UK Border Agency's strategic objectives. RALON had introduced a range of reporting mechanisms to monitor and report progress against these objectives. However, we found that more work was required to better measure performance and to communicate progress to staff within the RALON network.
3. We found that the UK Border Agency had an upstream intervention strategy which recommended that focusing resource on activity overseas to tackle illegal immigration would maximise the benefits to the UK. There was evidence to show that RALON was supporting this strategy, however, we found there was limited activity by RALON to identify and progress new investigations on its own account. We found that RALON had not yet realised the UK Border Agency's ambition to create a network of officers trained for a range of responsibilities, providing the flexibility to balance its existing commitments with an increased intelligence role and an upstream intervention capacity as detailed in their Transformation Journey.
4. RALON was missing opportunities to generate intelligence and we found that its handling and reporting processes were inconsistent. A lack of training and/or guidance was identified as a primary reason for this.
5. Where intelligence had been reported we saw evidence of a backlog of approximately 650 reports in the RALON Operations Centre. These reports were waiting to be processed on the UK Border Agency's secure IT intelligence database, known as Mycroft. The reports had been received from the RALON posts throughout the network and dated back to June 2009. As a result the UK Border Agency and its partners were being denied access to potentially valuable intelligence.
6. We found that risk profiles were out of date, poorly developed and were not being fully utilised by the Visa Services Directorate. There were varying reasons for this, but a fundamental problem was the lack of effective communication between RALON and the Visa Services Directorate. This had a detrimental effect on the amount of information available to Entry Clearance Officers to decide visa applications.
7. We found that some staff had insufficient training and guidance to perform all their duties and responsibilities. A particular problem was identified in respect of locally employed support staff, who informed us they had received little or no training since commencing work with RALON and were therefore not fully able to identify areas of risk.

8. RALON had adopted a new role as the overseas arm of the Border Intelligence Service on 1 October 2008. We found that it was already contributing intelligence to inform the UK Border Agency's Strategic Threat Assessment. Key however, was the general lack of understanding amongst RALON staff about the intelligence requirements of other parts of the UK Border Agency. Staff were therefore unaware of how their day to day work supported their new intelligence role, which in turn restricted the development of a full intelligence picture.
9. RALON did not have access to the Mycroft database. This inhibited the effectiveness of intelligence reporting and management. Staff had devised manual workarounds to maintain timely intelligence flows, but this had led to inconsistency and posed potential business risk.
10. We found that RALON had recognised the importance of underpinning its change programme with a communications strategy. New communications channels had been established to facilitate the flow of information, both from the centre and within the region. Nevertheless, in spite of this, key messages were not understood by frontline staff.

2. Summary of Recommendations

We recommend that the UK Border Agency:

1. Carries out an impact assessment of its work to reduce its level of RALON airport attendance and sets an objective to trial multi-functional working in the region in 2010.
2. Utilises the current review of Risk Profiles to standardise methodology and format using data and analysis from the rest of the UK Border Agency and from regular compliance analysis of visa issuing.
3. Conducts an urgent review of RALON support for the UK Visa Section in order to ensure that RALON:
 - proactively supports the decision making process, ensuring visa abuse and risk is communicated effectively to entry clearance staff; and
 - fully utilises the intelligence opportunities provided by the UK Visa Section to assess and respond to visa abuse that is suspected or identified.
4. Ensures that all RALON staff understand their role as part of the Border Intelligence Service.
5. Improves its handling and use of intelligence including clearing the backlog of intelligence reports and undertaking a fundamental and urgent review of guidance to:
 - prevent intelligence being communicated by insecure means;
 - confirm whether the Manual of Standards is applicable to overseas intelligence handling and, if so, made available to all staff across the Network. Where the Manual of Standards is not applicable, RALON should issue bespoke guidance, agreed with the Intelligence Directorate;
 - ensure the region follows existing guidance for allegation handling to ensure consistency of approach across RALON;
 - ensure all intelligence reports are graded and that documents are classified according to the Government Protective Marking Scheme;
 - ensure that the completion and flow of intelligence is consistent across RALON;
 - ensure that all staff are aware of the requirements of the Data Protection Act 1998, and undertake the Agency's mandatory training in information assurance; and
 - has regular audits of its intelligence storage and handling processes.

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.¹
- 3.2 The Chief Inspector is independent of the UK Border Agency and reports directly to the Home Secretary.
- 3.3 The Independent Chief Inspector's core inspection criteria² were used to assess the effectiveness and efficiency of the UK Visa Section under three broad headings:
- High-level outcomes of the business;
 - Processes and procedures, including quality of decision making and consistency of approach; and
 - Management and Leadership.
- 3.4 The specific criteria under each heading that were selected for the inspection are listed in full at Appendix 1. The inspection paid particular attention to how RALON contributed to the three UK Border Agency strategic objectives:
- *We will protect our border and national interests;*
 - *We will tackle border tax fraud, smuggling and immigration; and*
 - *We will implement fair and fast decisions.*
- 3.5 In order to assess the performance of RALON, the inspection focussed on delivery against agreed targets set by the UK Border Agency and the business plan objectives. We also inspected products produced and managed i.e. intelligence and information, to ascertain the adherence to published standards and guidance and to national standards and criteria.
- 3.6 In particular, evidence was gathered about processes which were used to prioritise work in order to react to identified threats and deliver against the targets and objectives. We looked at the sources of information and the systems in place to manage the intelligence produced, with a view to establishing how RALON identified and developed opportunities to tackle immigration crime. In order to assess RALON's commitment to assist the Visa Services Directorate improve decision making quality, we inspected the creation and use of risk profiles. We also gathered evidence relating to the effectiveness of local partnerships which are vital to developing upstream investigations and identifying inadequately documented passengers.

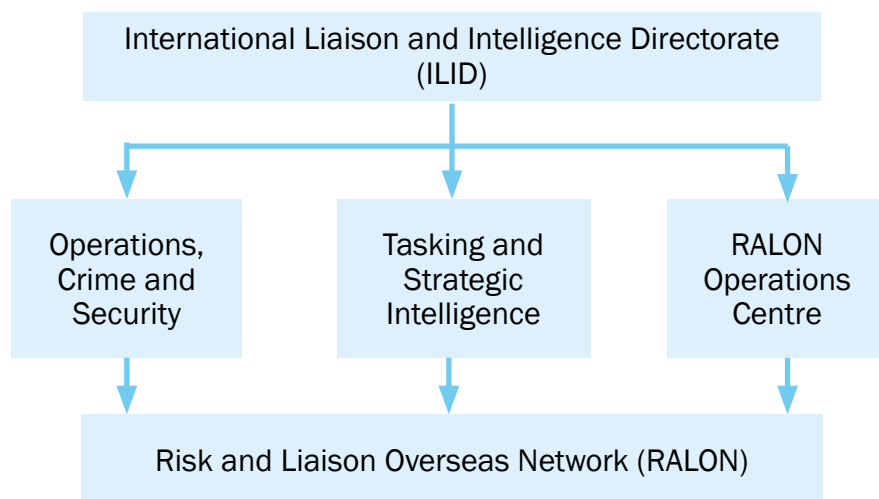
1 http://www.legislation.gov.uk/ukpga/2009/11/pdfs/ukpga_20090011_en.pdf

2 The Independent Chief Inspector of the UK Border Agency's core criteria can be found at http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Criteria_for_core_programme.pdf

4. Background – RALON

- 4.1 The Risk and Liaison Overseas Network (RALON) formally came into being on 1 October 2008. It is an amalgamation of the former overseas Airline Liaison Officer Network, which had been established to support airlines to detect and deter inadequately documented passengers, and the overseas Risk Assessment Unit Network, which provided intelligence support to the visa operation.
- 4.2 RALON is the overseas arm of the International Liaison and Intelligence Directorate (ILID) within the International Group of the UK Border Agency. ILID is also the international part of the Border Intelligence Service (see Appendix 2 – a diagram of the Intelligence Network), which was established in 2008 when the intelligence assets of the Border and Immigration Agency, UKvisas and HM Revenue and Customs were combined as part of the creation of the UK Border Agency.
- 4.3 The Border Intelligence Service of the UK Border Agency comprises of the Intelligence Directorate and intelligence practitioners in the three main business groups, Immigration Group (IG), Border Force (BF) and ILID. The aspiration is to be an intelligence-led organisation, working collaboratively to identify threats posed by people and goods and helping strengthen the UK's overall protection against terrorist attack. Figure 1 sets out the organisational structure of ILID.

Figure 1: The organisational structure of the International Liaison and Intelligence Directorate (ILID)



- 4.4 RALON has around 100 officers posted in over 50 countries, co-ordinated by a UK based operation centre. RALON is jointly tasked by the Border Intelligence Service on behalf of the wider UK Border Agency and also by International Group's regional managers and directors, with work prioritised by means of a Tasking and Co-ordination (TCG) Group mechanism.
- 4.5 The UK Visa Section, which was responsible for making entry clearance decisions in relation to settlement visa applications made by customers in Pakistan, had not been allocated any direct RALON resource by ILID. We were told this was because it was supported remotely by the RALON team in Islamabad. However, our inspection of the UK Visa Section found a complete absence of intelligence activity to support decision makers in their work. We report on this further in our report "*An inspection of the UK Visa Section: Pakistan settlement applications*".³

Objectives

- 4.6 In support of the three strategic objectives of the UK Border Agency, ILID delivers against both International Group (illustrated in Figure 2) and Border Intelligence Service business objectives. RALON activity provides an important link between what happens overseas and in the UK, facilitating the flow of intelligence to enable targeted action against identified threats.

Figure 2: UK Border Agency International Group Objectives

UKBA International Group Objective	RALON activity
Implement new visa regimes	RALON provides risk profiles and country specific risk assessments
Review UK Border Agency's Country Plans	RALON contributes to country plans through upstream intervention strategies such as police referral programmes
Advancing UK objectives through EU and international fora	RALON participates in a number of international working groups e.g. the International Liaison Officers' Managers Network
Disrupt five organised immigration crime operations	RALON's target is to have at least one successful operation concluded in each overseas region by the end of 2010
Prevent 90% of inadequately documented passengers boarding flights	This target refers to flights where RALON operate
Enhanced impact of co-ordinated intelligence work overseas	e.g. working with host agencies, SOCA and the rest of UK Border Agency to improve the flow of intelligence and target action against the threats identified
Improve decision making quality	RALON provides visa risk profiles
High quality leadership and staff management.	In line with the overall HR strategies of the UK Border Agency.

- 4.7 An objective of the Border Intelligence Service was to refresh the UK Border Agency's Strategic Threat Assessment (UKBA STA) produced in 2008, and produce, by August 2009, a National Intelligence Requirement (NIR) and a Control Strategy for the UK Border Agency. RALON contributes to this objective by submitting monthly post reports which are analysed by ILID and fed into the UKBA STA.

³ This report is available at www.independent.gov.uk/icinspector/inspections/inspection-reports/

Principles

4.8 All UK Border Agency intelligence activity is governed by the Border Intelligence Service's "Intelligence Constitution". This sets out nine key principles which govern how the UK Border Agency will collect, analyse and handle intelligence. The principles are:

1. You should identify and develop networks and partnerships where we have a shared interest;
2. Having a commitment to share and increase the lawful and secure flow of information locally, nationally and internationally;
3. Using national standards for recording, reporting and passing on information;
4. Adopting nationally accredited skills, competencies and training standards;
5. Producing and using a standard set of intelligence products, produced in consultation with customers;
6. Producing a single national intelligence requirement to increase UKBA's knowledge;
7. Implementing a tasking and co-ordination system that prioritises threat assessments, sets objectives and leads to the effective action and deployment of resources;
8. Making debriefing an integral part of operational procedures to increase knowledge;
9. Measuring performance to ensure effectiveness.

Partners

4.9 RALON collaborates with a wide range of partners. The main ones are:

- **UK Border Agency Border Force and Immigration Group**
Each group within the UK Border Agency has produced its own statement of business interests. This document sets out each group's intelligence requirements to inform the activity of the other two. The flow of intelligence between the three groups is facilitated by the UK Border Agency's central Intelligence Directorate and cross-group activity is managed via the tasking and co-ordination (TCG) process.
- **Serious Organised Crime Agency (SOCA)**
A key partner in delivering the UK Border Agency's upstream intervention strategy. SOCA is responsible for tackling serious organised crime that harms the UK, including drug smuggling, human trafficking, major gun crime and money laundering. RALON supports SOCA with its knowledge on immigration matters, including tactical and strategic immigration intelligence. RALON refer cases involving a high level criminality to SOCA which has expertise in criminal investigations.
- **The security and intelligence services**
ILID's intelligence role contributes to the UK Border Agency Counter Terrorism and National Security strategies.
- **The police and related agencies (e.g. UK Human Trafficking Centre⁴ and Child Exploitation and Online Protection Agency)**
RALON has a direct working relationship with the Police and other law enforcement agencies where there is a clear overseas dimension (e.g. human trafficking).

⁴ The UK Human Trafficking Centre became part of SOCA on 1 April 2010

- **Air, rail and sea carriers**

RALON act as the first point of contact for carriers when they encounter suspected forged passports. The focus in the last two years has been to train carriers to a level where they need to refer to RALON only in cases involving sophisticated forgery.

- **Overseas governments and law enforcement agencies**

As RALON has no formal overseas jurisdiction, host governments are key partners. Levels of co-operation vary from post to post, but increasingly the UK Border Agency has found that source and transit countries recognise that it is in their interest to work with them to tackle illegal migration.

5. Inspection findings – High level outcomes of the business

5.1 In addition to assessing the RALON operation in the United Arab Emirates and Pakistan (including its support for the UK Visa Section) against our core criteria, we also looked at RALON's progress against its stated objectives in support of the UK Border Agency's Strategic Objectives, in particular:

Strategic Objective 1: Protect our Border and our National Interests

- Provide support to the visa operation through risk profiles and forgery expertise.

Strategic Objective 2: Tackle Border Tax Fraud, Smuggling and Immigration Crime

- Prevent 90% of inadequately documented passengers boarding flights;
- Disrupt five organised immigration crime operations;
- Enhanced impact of co-ordinated intelligence work overseas.

Strategic Objective 1

5.2 We found that RALON was not supporting the visa operation in the region as well as it or Visa Services Directorate wanted. This was acknowledged by staff we spoke to at all levels and from both Visa Services and RALON.

5.3 Risk profiles were the main problem for a number of reasons as detailed below. The purpose of the profile was to highlight areas of concern so that a focussed review of a visa application could take place and help mitigate risks that existed. The risk profile itself did not decide if a visa should be issued or refused, rather it was an aid to Entry Clearance Officers when making visa decisions. Risk profiles should be developed and reviewed using results of profiling exercises, forgery analysis and compliance checks. We found that:

- RALON did not understand what Visa Services wanted from risk profiles;
- RALON was not producing useable risk profiles;
- Entry Clearance Officers, who process visa applications, did not understand the limitations of risk profiles, nor did they believe that they added to their knowledge; and
- Visa Services were not routinely using risk profiles as part of the decision making process, so RALON was not prioritising their production nor keeping them up to date.

5.4 We found evidence to support each of the above contentions. These had combined in hindering the ability of both parties to work more closely together. At the heart of the problem we identified a breakdown in communication which had led to a mutual misunderstanding of what was required and what could be produced. Entry Clearance Officers told us that RALON wasn't providing "proper risk profiles" and that some of the profiles were "a bit bland", while one member of staff, referring to a profile they had seen, told us "they could have written it" themselves.

- 5.5 RALON managers cited the fact that Islamabad had stopped using risk profiles within the Decision Support Tool as a reason for not currently working on risk profiles. RALON managers in Pakistan also told us that some Entry Clearance Officers expected profiles to decide rather than inform the decision. However, the same managers admitted they did not know what Visa Services actually wanted from risk profiles.
- 5.6 In Islamabad we were told that risk profiles had not been updated for over a year, while in the United Arab Emirates, RALON staff told us that risk profiles were “out of date and needed updating”. Of equal concern, staff told us that they did not have sufficient time to undertake compliance exercises to inform risk profiles. We examined a number of risk profiles and found they had not been updated since March 2007 however we were subsequently told the profiles had been updated in December 2008.
- 5.7 Of particular concern was the lack of RALON support to the UK Visa Section (located in Croydon), which had assumed responsibility for determining Pakistan settlement applications in January 2009. We found that a breakdown in communication had occurred which meant that this new section had not received the intelligence support from RALON that it required to operate effectively.
- 5.8 We noted that by the time of our inspection a risk profile had been sent to the UK Visa Section. However, it had not been reviewed for eighteen months. We were pleased to note that RALON was now participating in the new induction training course of newly appointed Entry Clearance Officers and Entry Clearance Managers in the United Arab Emirates.
- 5.9 We were also told that the UK Border Agency International Group had set up a working party, referred to as the risk profile user group, to review the use of risk profiles. The aim of this user group was to develop a standard risk profile that will take into account information and intelligence from across the UK Border Agency. The new format is to be easy to use and will take into account the requirements of Visa Services.
- 5.10 During the inspection many of the risk profiles we were shown were based almost exclusively on analysis of visa issues and refusals. This is an important starting point, but without enriching this with regular compliance checks and analysis from the UK, the risk profiles will not add to Entry Clearance Officers’ existing knowledge. Staff told us the following information was not available to inform risk profiles:
- UK compliance data;
 - statistics from colleges;
 - UK refusal data; and
 - full visa application details.

We recommend that the UK Border Agency:

- utilises the current review of Risk Profiles to standardise methodology and format using data and analysis from the rest of the UK Border Agency and from regular compliance analysis of visa issuing.
- conducts an urgent review of RALON support for the UK Visa Section in order to ensure that RALON:
 - proactively supports the decision making process, ensuring visa abuse and risk is communicated effectively to entry clearance staff; and
 - fully utilises the intelligence opportunities provided by the UK Visa Section to assess and respond to visa abuse that is suspected or identified.

Strategic Objective 2

Tackle Border Tax Fraud, Smuggling and Immigration Crime

- Prevent 90% of inadequately documented passengers boarding flights;
 - Disrupt five organised immigration crime operations; and
 - Enhanced impact of co-ordinated intelligence work overseas.
- 5.11 RALON has a target to deny boarding to 90% of inadequately documented passengers. We found that the South Asia and Gulf region was exceeding this target and had achieved 96.8% for the year to date (March 2010). It was clear this was due to the strong and effective partnerships developed with the main airlines operating out of the region. We spoke to the heads of security at British Airways, Emirates Airlines and Etihad Airways and all confirmed effective working relationships had been established with RALON.
- 5.12 RALON report that the success of the relationship with the airlines had been founded on intensive RALON support, both in terms of training and physical assistance, be that a 24-hour contact facility or regular airport attendance. This is very much a legacy from the way that the Airline Liaison Officer Network operated before the creation of RALON. Staff told us that regular attendance was necessary because of high airline staff turnover and new illegal migration/fraud trends.
- 5.13 This may be a persuasive argument, but without testing it and looking at the impact on the number of inadmissible arrivals in the UK, RALON will not be able to take a properly informed view of priorities and resource needs. As RALON attempts to broaden its role, an assessment needs to be made of resources that can be devoted to RALON's various roles.

We recommend that the UK Border Agency:

- carries out an impact assessment of its work to reduce its level of RALON airport attendance and sets an objective to trial multifunctional working in the region in 2010.
- 5.14 We found several examples of good practice of joint working with partners. For example, RALON staff had delivered forgery training on travel documents to over 200 United Arab Emirates immigration staff, following a request made by the Ministry of Interior in the United Arab Emirates. This training had taken place during the course of our inspection.
- 5.15 In Islamabad we were told about the relationship established with the Higher Education Commission and the banks which had enabled RALON to verify documents quickly and effectively. This helped support the Visa Section to make timely and accurate decisions. This relationship and the one fostered with the FIA supports Principle 1 of the Intelligence Constitution – to identify and develop partnerships.
- 5.16 We found that RALON had developed a productive relationship with SOCA, its major overseas law enforcement partner. This was evidenced by the ongoing investigation into the 2008 theft of 4500 UK visa vignettes and 3600 British passports in the United Kingdom. The stolen documents continue to be encountered in the region and RALON's work with airlines helped successfully prevent a number of illegal migrants getting to the UK using stolen documentation. The intelligence derived from these interdictions had been passed back to the UK to support the criminal investigation.

5.17 The SOCA liaison officers in Pakistan and the United Arab Emirates reported positively on their relationship with RALON, but both added the relationship was largely informal, with little or no underpinning formal structure or process. There was also a mutual uncertainty concerning the respective roles of each organisation, in relation both to operations against organised immigration crime and in relation to drugs and commodities. We found that there needs to be clarity, agreement and communication of the respective responsibilities to both RALON and SOCA staff.

5.18 While we found evidence that RALON was supporting operations against organised immigration crime, such as the investigation mentioned above (paragraph 5.17), we found little evidence that RALON had itself developed any operational activity against immigration crime in its 2009/2010 Business Plan. The UK Border Agency's International Group stated that its focus for 2009/2010 included "maximising the impact of our upstream work overseas.....and disruption of organised crime and trafficking". This is clearly an area where RALON, working with UK partners such as SOCA and local law enforcement agencies, can have an impact. We found four main inhibitors to this:

- flexibility of resources;
- prioritisation;
- training and guidance; and
- partner engagement.

These issues are looked at in more detail throughout the report.

5.19 RALON's aspiration has been to increase its span by integrating the officers from Airline Liaison Officer Network and Risk Assessment Units. This will create multifunctional officers who are trained in a range of responsibilities who can react according to risk. These officers should also be capable of contributing to all elements of the network's new agenda, focusing on commodities as well as people.

5.20 The inspection found that in Pakistan and the United Arab Emirates progress towards this has been slow. We were repeatedly told by staff that the former airline and risk roles were very different and that in some cases, different terms and conditions of employment were an inhibitor to cross-working. The lack of progress to develop the officers to perform all functions had inhibited RALON moving away from traditional airline work to identifying risk more generally, progressing investigations and satisfying their new objectives.

5.21 Staff were concerned about striking the balance between respective roles and believed more progress and flexibility could be achieved if all issues surrounding terms and conditions were resolved. We found that staff were supportive about the idea of working in all areas of responsibilities, but their major concern was that they received the requisite training. Immigration Liaison Officers in the United Arab Emirates told us they would like to move to greater diversity of roles, but that at present the focus was on greater support for the visa operation. The lack of flexibility resulted in RALON staff based in Dubai travelling to Abu Dhabi airport to liaise and assist the airport staff in relation to inadequately documented passengers. We concluded therefore that the RALON network was still heavily committed to the respective roles of its two former parts.

5.22 Staff within the region said they lacked the necessary training to carry out investigations. In the United Arab Emirates, one Immigration Liaison Officer said that guidance had just been sent out; other Immigration Liaison Officers told us that they had not seen it. The shortcoming in the training was confirmed by managers based in the RALON Operations Centre who have now introduced an extended induction training programme. There was no training or guidance relating to the UK Border Agency's illegal drugs and commodities work. We look at training in more depth in Chapter 7.

- 5.23 We appreciate that RALON's transformation journey envisages full integration by 2011 but found that, some two years after its creation, RALON needs to be further down the road to testing the viability of multi-functional officers and resolving any outstanding issues concerning terms and conditions. Unless these issues are resolved as a matter of priority, we would be concerned that RALON will not achieve its 2011 integration goal.
- 5.24 In support of RALON's objectives and activity, a Tasking and Co-ordination mechanism had been introduced to assist with prioritisation in line with Principle 7 of the Intelligence Constitution (as detailed at paragraph 4.8). This is a discipline adopted by the Police to ensure maximum impact from finite resources. Central and regional tasking and co-ordination groups (TCGs) had been set up by RALON to direct operational activity. The system was designed to ensure priorities were identified and dealt with effectively. At the time of the inspection, the South Asia and Gulf region had held two TCGs and we were disappointed to find from our inspection of the minutes of these meetings that there was little evidence of prioritising activity.
- 5.25 The Regional Manager accepted that the prioritisation element was missing from the TCG. Staff in Pakistan told us they had received no tasking from the regional TCG, nor had they sought to use the TCG process to task other parts of the UK Border Agency (e.g. information on visa issues or assistance with compliance checks). It is accepted that some of this information will come via other channels, but we found the TCG process was not yet operating as intended. Effective use of the process will help drive and prioritise operational activity and assist in obtaining information to address intelligence gaps.
- 5.26 In its role as part of the Border Intelligence Service, we were pleased to see that RALON intelligence was being routed back to the UK and informing the UK Border Agency Strategic Threat Assessments, contributing to Principle 6 of the Intelligence Constitution.
- 5.27 The creation of the Border Intelligence Service was underpinned by the Intelligence Constitution which enshrined nine key principles to guide the work of all intelligence staff. These principles cover behaviours (e.g. a commitment to share and increase the lawful and secure flow of information locally, nationally and internationally) and best practice (e.g. using national standards for recording, reporting and passing on information).
- 5.28 Alongside this, the three main business groups within the UK Border Agency (International, Border Force, and Immigration) had produced and issued "statements of business interest". These let intelligence officers in other parts of the UK Border Agency know about their priorities and so inform intelligence gathering and reporting. Our inspection found a very low level of awareness of the Intelligence Constitution, its nine principles and the statements of business interest at all RALON grades below Regional Manager in the region. We have made recommendations relating to communications in the section on *Management and leadership*.

Other high-level findings

- 5.29 We found that RALON was not maximising its opportunities to generate intelligence. While in part this necessarily reflected RALON's various roles, as it seeks to broaden its scope and serve as the UK Border Agency's overseas intelligence network, we would expect its focus to be on maximising current opportunities to generate intelligence, while realigning priorities to further increase its intelligence capacity. In recognition of this, the Regional Manager had set a target of producing ten intelligence reports a month. Although to date we noted that this target had not been achieved, we commend this local practice as an attempt to focus staff on the intelligence role.
- 5.30 We found a number of reasons why RALON had not generated more intelligence. There were a number of competing priorities that we have already mentioned. In addition, staff in the United Arab Emirates told us that the low level of intelligence generated was due to a lack of time (see Figure 3) and inefficient working practices. In Islamabad, staff also pointed to pressure of other work, especially verification work in support of Visa Services, which they said was the major reason why they were

not undertaking more field trips and investigations (both major potential sources of intelligence). We also found that information gathered by the UK Visa Section in Croydon was not being turned into intelligence. These findings underline our previous comments and recommendations surrounding airport attendance, multifunctional staff and the TCG process.

Figure 3: Example of lack of intelligence development prioritisation

During the inspection we were told a facilitator had been identified and through further enquiries it was established they had travelled to and from the UK to Bangladesh 14 times in the past three years. The RALON officer believed further investigation would identify additional offences however, due to time constraints and the commitment to attend the airport they were unable to progress this further.

- 5.31 We found that even where the opportunity to generate intelligence did exist, it had not always been acted on in a timely manner. The processing of information and reporting of intelligence had not yet been embedded in the culture of the organisation. For example, we found that it was considered easier to report information in an email than to sanitise it in an intelligence report. We find this practice unacceptable and not in line with the management of sensitive information as detailed in the Government Protective Marking Scheme.
- 5.32 We also found that officers were more comfortable utilising traditional methods of reporting trends, such as routine monthly reports. Such reporting cannot be recorded on a central system where the individual pieces of information can be retrieved. It is essential that intelligence is recorded in a retrievable format so the organisation is not denied access to perhaps vital information. Figure 4 details an example where information was being developed to demonstrate a trend, but intelligence was not reported in a timely manner to support another area of the UK Border Agency's business.

Figure 4: Example of slow intelligence flow

The information received:

During the inspection we found information dated 23/01/2010 alleging a breach of the immigration/visa system by a UK college. It was not known where or when this information came into the possession of the UK Border Agency. RALON received this information nearly two months after the date of the information. The date of receipt or who delivered it is not recorded.

Action by RALON:

Research by RALON identified the allegation referred to a UK college which was suspended on 19/01/2010 from sponsoring student visa applications. Analysis of visa applications in the United Arab Emirates established 586 applications related to this college of which 529 applications had been decided and 291 had been refused. At the time of the inspection, RALON had been in possession of the information for approximately one week and the research was in progress.

Chief Inspector's comments:

- Allegations must be date stamped on receipt and recorded in an Allegations Register;
- Colleges can only be suspended for 28 days, therefore the initial intelligence should have been reported to ILID immediately to support the legal process. This observation was accepted by RALON;
- Demonstrates the culture of developing trend information prior to sending intelligence;
- Excellent development work to establish full intelligence picture;
- RALON staff confirmed there was a knowledge gap regarding the procedure for suspending colleges in particular time frames.

- 5.33 Our recommendations relating to processing of intelligence are set out in Chapters 6 and 7.
- 5.34 Debriefing is a key intelligence gathering tool, the importance of which is recognised in Principle 8 of the Intelligence Constitution. This sets out to make debriefing an integral part of operational procedures to increase knowledge. It can range from a review of activity through to the use of informants. We recognise that the use of informants requires a high-level of training and would not be appropriate for RALON officers at this point in their development.
- 5.35 However, the skill levels required to debrief existing activity or to follow up interdiction activity should be within RALON's compass, with an achievable level of investment in training and guidance. Indeed, we found that some debriefing of persons denied boarding was taking place, but that this was sporadic. In both the United Arab Emirates and Pakistan, RALON staff told us that the lack of training and/or guidance was a problem. We understand that the Intelligence Directorate is currently conducting a review of debriefing which will address RALON's requirement for guidance.
- 5.36 RALON needs to continue to enhance its work with local agencies such as the Abu Dhabi police and the Pakistan Federal Investigation Agency. Building local relationships will help increase the flow of intelligence (in line with Principle 2 of the Intelligence Constitution) while ensuring local operational guidelines are followed.
- 5.37 We looked at RALON's performance management processes which used the following reporting documents:
- Post Monthly Report (PMR) – which reports operational activity;
 - Regional Objectives (referred to as the Dashboard) – which set out regional strategic objectives and the nine intelligence principles; and the
 - Nine principles template – a quarterly self assessment.
- 5.38 We found reporting mechanisms were in place for operational and strategic activity to inform ILID. However, we found there was no formal reporting to track progress against the UK Border Agency's objectives and the Transformation Journey detailed in the Dashboard. We believe that the Dashboard should be amended to include progress and achievements against objectives and by doing so would also enable RALON to track progress against the Transformation Journey.

We recommend that the UK Border Agency:

- conducts an urgent review of RALON support for the UK Visa Section in order to ensure that RALON:
 - proactively supports the decision-making process, ensuring visa abuse and risk is communicated effectively to entry clearance staff;
- fully utilises the intelligence opportunities provided by the UK Visa Section to assess and respond to visa abuse that is suspected or identified.

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

- 6.1 We considered in particular how RALON handled intelligence, both in terms of consistency and as measured against existing UK Border Agency guidance. In so doing we reviewed a sample of 70 allegations (see definition below) and 16 intelligence reports. Where relevant, intelligence reports were tracked from the region back to the UK in order to identify if they were correctly actioned and had reached the appropriate recipient in a timely manner.

Allegations

- 6.2 An allegation is a piece of information which brings a perceived breach of the immigration/visa system to the attention of the UK Border Agency. Large volumes of allegations are received from members of the public and can provide a valuable source of intelligence that can assist in identifying risk to the UK. Whilst it is accepted that not all allegations meet operational priorities or contain sufficient information to warrant operational activity, there is a clear expectation that allegations should be handled methodically and efficiently. Where an allegation does meet operational priorities, intelligence reports should be produced and acted upon accordingly. Figure 5 shows the allegations processed between April 2009 and March 2010.

Figure 5: Number of allegations processed

Month	Abu Dhabi	Islamabad
Apr-09	49	90
May-09	139	259
Jun-09	127	328
Jul-09	100	264
Aug-09	120	200
Sep-09	61	179
Oct-09	80	158
Nov-09	63	105
Dec-09	49	155
Jan-10	78	237
Feb-10	103	329
Mar-10	94	258
Total	1063	2562

Note: The process in Abu Dhabi does not record allegations received where no further action is taken.

- 6.3 Following a review in November 2009, RALON decided that Islamabad should lead for the region on handling allegations. Given that the majority of allegations received related to Pakistani nationals, and as a way of avoiding duplication of effort, we consider this was a sensible decision. From November 2009, only allegations received in Abu Dhabi that related to a “live” application have been dealt with in Abu Dhabi. The remainder were sent to the appropriate RALON post or department for action.
- 6.4 We looked at the processes to handle allegations in the region and we found that each post was handling allegations differently which meant allegations were not being handled consistently. At the outset of our inspection we were provided a copy of the Allegations Guidance, issued by ILID. This set out how RALON staff should process and manage allegations. However, during our inspection we were shown four separate documents, all relating to the handling and storage of allegations, comprising of a mix of local and centrally issued guidance, none of which were the ILID guidance. We found this did not help staff understand the correct administrative processes. The main concerns we had with the handling of allegations were:
- in Abu Dhabi, visa staff were allowed to see the whole allegation file, including the source details. Allegations Guidance issued by ILID states source details must be protected;
 - we asked to see the source register however we were informed by staff in Abu Dhabi that they did not maintain a register for allegations. As a result there was no effective record of when allegations were received, by whom, when they were dealt with and what action was taken;
 - allegations sent by e-mail to the visa section in Abu Dhabi received an automatic reply, telling the sender where to send the allegation. However, the message also said that information sent to the wrong location would not be actioned and deleted. While we understood the need to avoid nugatory work, we felt this approach constituted a significant risk if, for example, the allegation was of a serious nature and the sender did not, for whatever reason, redirect it as requested;
 - Abu Dhabi had no set form to record allegations received by phone. We were told that it was rare for allegations to be made by phone, but this serves to underline the value of a pre-determined set of questions. A set form would ensure information is collected in a consistent manner and act as a prompt to ensure staff obtain sufficient detail. The completed form could also be used for audit trail purposes; and
 - in Islamabad we observed someone from Visa Services come into the RALON office, pull out an allegation and read the contents of the file. No record was taken of who that individual was, or what was read. This provided no security for the source. We were told that an access register did exist, but wasn't used. We asked to see this register, but staff were unable to locate it.
- 6.5 In order to assess the handling of allegations we selected 50 allegations held in Islamabad and 20 in Abu Dhabi. Due to the lack of a source register and details recorded in Abu Dhabi we were unable to carry out any meaningful analysis on the Abu Dhabi files.
- 6.6 Of the 50 allegations in Islamabad, ten were selected randomly from the secure filing system and 40 were randomly selected from the allegations register which was established in October 2009.
- 6.7 Of the 50 files selected only 46 were assessed. This was because four files (10%) from the 40 files randomly selected from the allegations register were missing or not provided.

Recording and storing the intelligence

- 6.8 We examined the Allegation Guidance issued by ILID. This detailed the requirements that RALON staff should follow for recording and actioning allegations received. From this guidance we selected five indicators (detailed in Figure 6), which represented information that must be recorded on an allegations register. We examined all 46 cases against the five indicators to assess the handling of allegations. Of the 46 cases, only 38 could be assessed on all five indicators. This was because the remaining eight files had insufficient information to assess all indicators.
- 6.9 The sampling showed that all 46 files had failed one or more indicator. The source details had not been recorded in a register which is contrary to the centrally issued Allegations Guidance. Details of the number of files (out of 38 unless stated) failing each of the five indicators are detailed in Figure 6.

Figure 6: Recording and storing evidence

Indicators for the recording and storing of intelligence	Number of files failing indicator	Percentage of files failing indicator
Recording of source details	46	100%
Completion of allegation register	10	22%
Allocation and recording of a local reference number	0	0%
Recording of action taken following assessment of the allegation*	4	11%
Secure storage of file**	4	10%

Note: * Only 38 files were assessed against this indicator. ** Only 40 files were assessed against this indicator (we were unable to assess if any files were missing prior to the introduction of the Allegations Register).

Outcomes of the assessment of allegations

- 6.10 We examined the 46 allegations to ascertain if the information had been actioned correctly. We were unable to identify the action taken for two files due to the lack of information recorded on the allegation. For the remaining 44 files where an outcome was identified we found:
- seven files (16% of sampled files providing outcome information) resulted in no further action;
 - thirty-seven files (84% of sampled files providing outcome information) resulted in the issue of a local alert; and
 - none of the sample resulted in an intelligence report being sent to the UK.

Assessment against UK Border Agency's priorities

- 6.11 We also examined the 46 allegations to ascertain if the information had been correctly assessed and intelligence reported where appropriate. We found seven files (16% of sampled files providing outcome information):
- were incorrectly assessed against UK Border Agency priorities; and
 - should have resulted in intelligence being reported to the UK, but no intelligence reports were produced.

- 6.12 We found there was not a consistent and methodical approach to handling allegations as detailed in the centrally issued Allegations Guidance. This could impact on the duty of care to correspondents, where the source material was not protected, in particular where allegation files were missing.
- 6.13 While not all allegations were suitable for further action, we found opportunities to create or use intelligence were being lost, because information contained in allegations was not being assessed correctly against the UK Border Agency's priorities and reported. The UK Border Agency depends on accurate and useable intelligence to deliver services for the public. RALON was failing to utilise this valuable source of intelligence.

Intelligence Reports

- 6.14 In terms of processing intelligence, we found RALON faced a particular challenge in operating overseas, where it used a different IT platform to most of the rest of the UK Border Agency (i.e. RALON was supported by the Foreign and Commonwealth Office Firecrest IT network). The challenge was compounded because RALON did not have access to the UK Border Agency's confidential IT intelligence database, Mycroft. This had led to RALON developing a number of "workarounds" to ensure that intelligence was sent to the UK. The inspection identified a number of areas of concern with the practices that had been adopted.
- 6.15 In Islamabad, we were told that up until the end of 2009, intelligence was produced on information reports, an unclassified document. The intelligence was not graded and was sent unclassified on the restricted FCO Firecrest system. From the start of 2010, intelligence logs were created. The logs were graded but are still not classified and again we noted they had been sent unclassified on Firecrest. We were told that Islamabad will shortly be receiving an upgrade to Firecrest which will allow transmission of material up to a restricted classification.
- 6.16 Without direct access to Mycroft, RALON had also had to devise a workaround for inputting of intelligence from across its network. Prior to June 2009, this had been done on behalf of RALON by an intelligence team from the UK Border Agency based in Sheffield. After this time, and because of resource constraints, this work had been passed back to the RALON Operations Centre in the UK.
- 6.17 This team faced its own resource pressures and were only able to access a Mycroft terminal in another office for one day a week (in which time an average of 10-20 intelligence reports could be entered). This resulted in a backlog at the time of the inspection of some 650 intelligence reports being created. The reports had been received from RALON posts throughout the network and dated back to June 2009. The RALON Operations Centre had attempted to prioritise the backlog to minimise the risks. Prioritisation was based on the age of the information and an assessment of content and analysed as follows in Figure 7.

Figure 7: Backlog as at 25 April 2010

Urgent	40 intelligence reports from 2009 10 intelligence reports from 2010
Routine	281 intelligence reports from 2009 318 intelligence reports from 2010

Note: Figures were supplied by the RALON Operations Centre

- 6.18 We reviewed 10 intelligence logs from this backlog and agreed with the prioritisation methodology used. However, we were concerned to find that many of the intelligence reports that had been deemed to be urgent were still outstanding more than six months after receipt. On 25 April 2010, a Mycroft terminal was installed at the RALON Operations Centre. We were told that new intelligence received at this centre was being given priority for input to Mycroft and when this is cleared on a daily basis, where resources permit, work will be carried out to reduce the backlog. No deadline had been set to clear the outstanding intelligence reports.
- 6.19 We consider that failing to record and act upon intelligence appropriately is a significant weakness. It meant information was not being properly assessed or communicated across the UK Border Agency. We consider this could have resulted in:
- a lack of access to intelligence which may have been vital for individual decisions by caseworkers and Immigration Officers at the border;
 - the production of risk profiles which were not fully informed;
 - a failure to identify and progress investigations into individuals who are engaged in immigration crime and cause harm to the UK; and
 - a failure to provide strategic intelligence on threats to the border.
- 6.20 The UK Border Agency depends on accurate and useable intelligence to deliver services for the public. Intelligence makes a key contribution to the Agency's delivery, by using the information to build both the wider and business specific pictures and to improve decision making.
- 6.21 We found that staff both in the UK and overseas lacked the necessary guidance on how to complete and when to use intelligence reports. Staff in the Risk and Analysis Department of the Intelligence Directorate told us that they used to receive some 300-400 reports a year from RALON, in a range of formats and via different routes e.g. some direct from posts abroad and some via ILID units in London. A RALON manager in the UK confirmed that consistency and quality remained a problem and acknowledged the need for guidance. This was confirmed by our sampling of intelligence reports in Abu Dhabi and Islamabad, where we found different reporting formats being used. The importance of consistency is recognised under the Intelligence Constitution Principle 3, which aims for the use of national standards.

Data Protection

- 6.22 RALON, like any intelligence unit, must observe the data protection principles regarding data quality and security in their handling of intelligence material. The Data Protection Act 1998 defines information which is considered to be personal or sensitive personal data and sets out eight data protection principles by which personal data must be managed in accordance with. We were told that all staff should have completed a data protection e-learning package, but staff told us that they had no central guidance relating to data protection and some staff had received no training in data protection. We believe the UK Border Agency should ensure all staff are aware of the requirements of the Data Protection Act 1998.

Police Referral Programmes

- 6.23 The aim of police referral programmes is to reduce visa abuse and immigration offences by holding those involved accountable for their actions and to contribute to the prevention of abuse and offences by allowing local law enforcement to deal with those involved. These programmes had been set up in both Pakistan and the United Arab Emirates. Figure 8 provides figures for the number of referrals made by the UK Border Agency under this programme from April 2009 to March 2010.

Figure 8: Number of Referrals made between April 2009 – March 2010

Month	Islamabad	Abu Dhabi
Apr-09	10	N/A
May-09	25	1
Jun-09	14	1
Jul-09	33	2
Aug-09	46	0
Sep-09	12	2
Oct-09	115	1
Nov-09	77	0
Dec-09	65	0
Jan-10	25	10
Feb-10	44	0
Mar-10	5	3
Total	471	20

- 6.24 We support the principle of these programmes but had concerns at how they were operating in the region. We were informed that the Memorandum of Understanding (MoU) between the Government of the UK and the Government of Pakistan agrees to the exchange of information relating to immigration crime. However we were concerned to learn that there were no post-specific policies or risk assessments in place as set out by the UK Border Agency in its strategy to govern the operation of these programmes, nor any formal feedback process to assist evaluation.
- 6.25 We appreciated that RALON needed to avoid placing unnecessary administrative burdens on the local police in order to secure co-operation, but were of the firm view that operating without agreed policies and without a feedback mechanism was an unacceptable risk. Adhering to the strategy would ensure the UK Border Agency is complying with local legal requirements and Human Rights legislation. The strategy also sets out performance measurement which enables the UK Border Agency to assess the effectiveness and impact of the programme.

General

- 6.26 We found that RALON supported the Visa Services Directorate in Abu Dhabi and Islamabad in the following areas:
- weekly reporting on trend analysis;
 - tactical alerts;
 - risk profiles;
 - forgery expertise;
 - document verification;
 - field trips; and
 - participation in weekly visa section meetings.

- 6.27 During the inspection in Abu Dhabi we observed entry clearance staff frequently seeking advice from RALON. In response to this demand, RALON was planning to introduce a single point of contact for enquiries from Entry Clearance Officers. In addition to providing dedicated support for the visa section, we were told this would also allow RALON staff to focus on intelligence development and compliance exercises. We think this is a sensible approach and one that could be extended to provide consistency of support to the UK Visa Section.
- 6.28 A common theme that emerged from staff we interviewed was that not enough central guidance had been issued by RALON to embed best practice and ensure consistency and we were concerned to note that existing guidance was not available. In particular, the Border Intelligence Service Manual of Standards, which set out the procedures for the recording and dissemination of intelligence material and the standards expected of all intelligence units within the UK Border Agency, was not available in either the Abu Dhabi or Islamabad RALON offices. Indeed, few staff we spoke to had even heard of it. During our inspection we were informed that the Manual of Standards was issued and disseminated throughout the UK Border Agency by the Border Intelligence Service both in paper format and CD.
- 6.29 The Manual of Standards applies as much to intelligence officers working overseas as to those elsewhere in the UK Border Agency. We were unclear why the Manual had not been adopted by RALON and made available to all RALON staff. This is contrary to Principles 3 and 5 of the Intelligence Constitution, which seek to adopt national standards for recording, reporting and passing on information utilising standard products.

We recommend that the UK Border Agency:

Improves its handling and use of intelligence. In particular:

- clears the backlog of intelligence reports;
- undertakes a fundamental and urgent review of guidance to:
 - prevent intelligence being communicated by insecure means
 - confirm whether the Manual of Standards is applicable to overseas intelligence handling and if so made available to all staff across the network. Where the Manual of Standards is not applicable, RALON should issue bespoke guidance, agreed with the Intelligence Directorates;
 - ensure the region follows existing guidance for allegation handling to ensure consistency of approach across the network;
 - ensure all intelligence reports are graded and that documents are classified according to the Government Protective Marking Scheme;
 - ensure that the completion and flow of intelligence is consistent across the network;
 - ensure that all staff are aware of the requirements of the Data Protection Act 1998, and undertake the Agency's mandatory training in information assurance; and
 - has regular audits of its intelligence storage and handling processes.

7. Inspection Findings – Management and Leadership

- 7.1 RALON brought together staff from two very different networks from different parts of the UK Border Agency. This is a major change programme which RALON had set out as a four year transformation journey. For this reason, our inspection assessed in particular how the change had been managed and communicated to date, and how training had supported staff to deliver the network's objectives.
- 7.2 While we noted that reporting mechanisms for operational and strategic activity were used to inform ILID, we found there was no formal reporting to track progress against the UK Border Agency's objectives and the Transformation Journey detailed in the Dashboard. We believe the Dashboard should be amended to include progress and achievements against objectives and by doing so would also enable RALON to track progress against the Transformation Journey.
- 7.3 Overall, we found that staff morale within RALON was high, with evidence of good teamwork and enthusiastic officers. Managers at all levels were well respected, approachable and provided day to day leadership. There was a clear commitment amongst the staff to play their part in securing the UK border and the former airline and risk networks were working well together. In Chapter 5, we have referred to the limited progress to date towards creating multi-functional roles and the reasons for this. Chapter 5 also highlighted both the progress made in partnership working (e.g. with SOCA and local law enforcement agencies) and where more work was needed (e.g. working with the visa side on risk profiles).

Change management

- 7.4 We do not underestimate the challenge faced by RALON in setting up a new global network, one which must deliver against the UK Border Agency's immigration and commodities objectives as well as contribute to the new Border Intelligence Service. Our inspection identified areas where RALON could be doing more to deliver the necessary change.
- 7.5 Effective communications are essential to manage change of this magnitude. We found that while new lines of communications had been established, there was a fundamental problem that key business messages were not being understood by RALON staff. For example, staff told us that they were confused by the structure and responsibilities within ILID in London. Also, RALON's partners told us that they were not clear about RALON's responsibilities and where respective demarcation lines had been drawn, particularly in respect of upstream intervention and commodities.
- 7.6 As mentioned, RALON's Transformation Journey is fundamental in delivering its change programme. It is illustrated in an internal management strategy document setting out the aspirations and various stages of the journey from 2008 to 2012. The Dashboard sets out the regional strategic objectives to support the Transformation Journey. We found that RALON staff in the region had little understanding of the strategy and in particular, what it meant for them. We found that more needed to be done to continually reinforce centrally issued messages, and test understanding.

7.7 We found that the reorganisation of ILID had caused confusion for staff in the region and this had adversely impacted on effectiveness and the vital flow of actionable intelligence. We recognise that this is an ongoing development, however, it is essential that it is underpinned by an effective communication strategy. We found evidence that communication about roles and responsibilities needed reinforcing. The Immigration Liaison Officers in both the United Arab Emirates and Islamabad told us they were not clear about the split of responsibilities within ILID, and the manager of the RALON Operations Centre admitted that they needed a better understanding of what their section did.

Training

7.8 It is an aspiration set out under Principle 4 of the Intelligence Constitution that all intelligence officers are trained to a national accredited standard. The creation of a new network necessitated a review of RALON training. The initial induction training was an eight day course however the training manager told us the feedback from participants was that this was not long enough. This echoes what we were told by staff we spoke to in the region. The general feeling was that the training did not provide sufficient detail to equip officers with the skills to identify and report on risk to the UK border. The main areas that staff would like more training on were:

- allegations;
- intelligence handling;
- debriefing;
- investigations;
- risk profiles;
- commodities and financial investigations; and
- the responsibilities of the ILID units.

7.9 During our inspection, we were informed that the induction training will be extended to three weeks commencing with the first three courses in 2010. The scope and timing of this inspection did not allow us to review this revised training schedule. However, this is something that will be reviewed as part of a thematic inspection of intelligence in the UK Border Agency later in 2010.

7.10 The Immigration Liaison Assistants in both Islamabad and Abu Dhabi told us they needed more training in a range of areas that covered the span of their jobs. We found no central training strategy for these assistants within RALON. We believe the UK Border Agency should conduct a training needs analysis to identify skills gaps for this group of staff and use this to develop a training plan.

We recommend that the UK Border Agency:

- ensures that all RALON staff understand their role as part of the Border Intelligence Service.

Appendix 1

Inspection Framework and Core Criteria

1. High level outcomes of the business

1.1(a)	There are clear and realistic performance targets to drive improvement
1.1(c)	There is effective joint working with delivery partners including enforcement and security agencies; commercial and relevant overseas partners
1.1(d)	There are clear procedures for handling data, including identity management, in accordance with national security and data protection requirements
1.1(e)	There are effective arrangements to manage demand so as to reduce existing backlogs and minimise future backlogs
1.1 (f)	There are clear mechanisms to use intelligence and other information so as to further improve performance develop policy and reduce immigration offending and to set operational priorities and tasking
1.1 (g)	Technology is utilised effectively to increase security and customer service
1.2(e)	UK Border Agency demonstrates its commitment to equality, fairness and respect for all customers, partners and staff
1.3 (g)	UK Border Agency seeks feedback from partners on the effectiveness of work of the agency

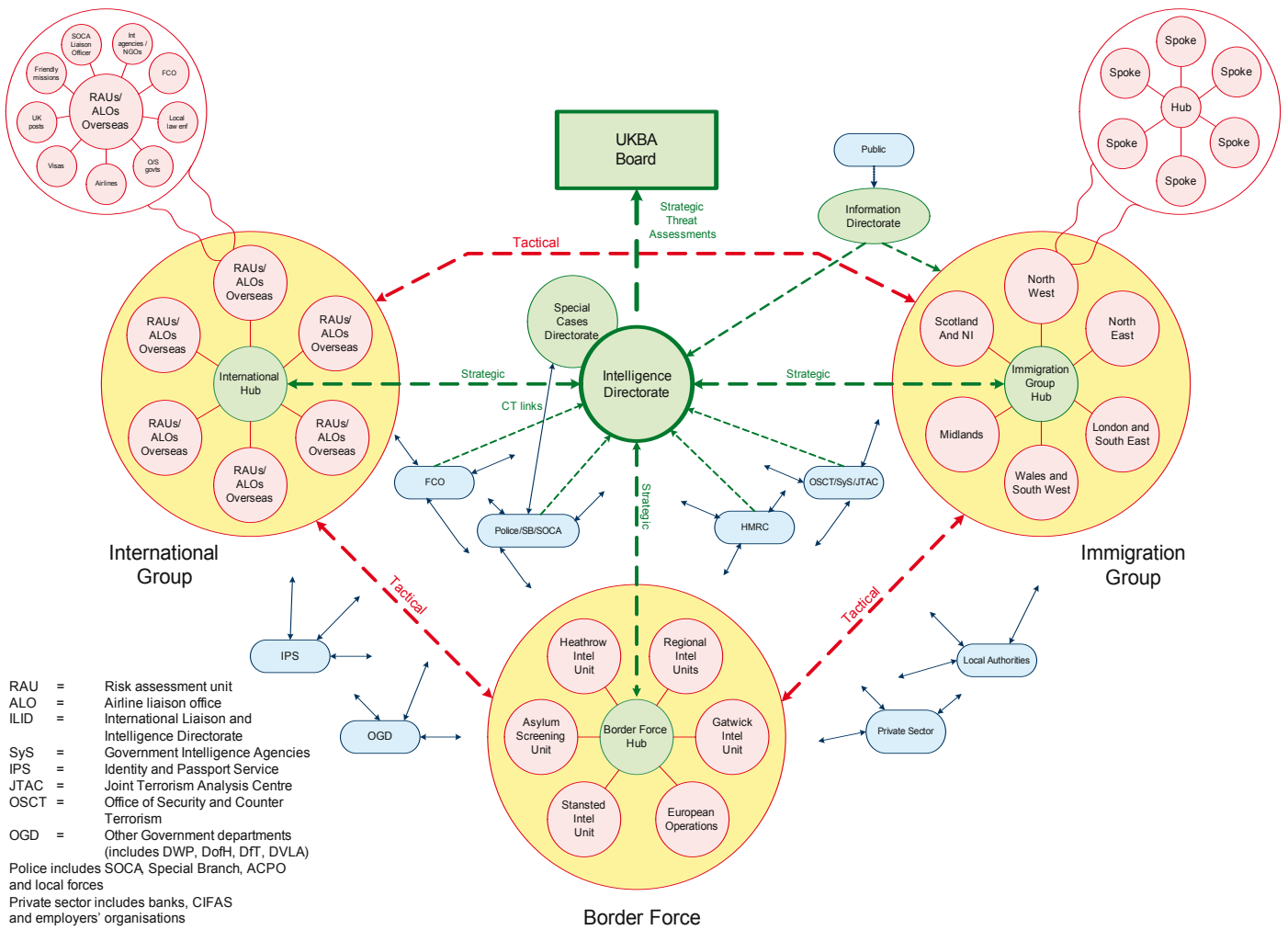
2. Processes and procedures (including quality of decision making and consistency of approach)

2.2 (a)	Decisions are made in accordance with international, European and domestic law
2.2 (b)	Customers' personal data will be respected and will be handled in accordance with DPA 1998
2.2 (d)	Decisions are made clearly based on all of the evidence and in accordance with current statutory requirements, published policy, guidance and procedures
2.2(e)	Training and written guidance enables staff to make the right decisions (lawful and reasonable)
2.4 (b)	Objective information used to make decisions is factually accurate and appropriate
2.4(c)	Risks, including protecting the public, are assessed and inform decision making
2.4 (d)	Decisions are consistent, appropriate and proportionate
2.4(g)	Managers regularly review the quality of decisions and consistency across the agency.

4. Management and Leadership

4.1(d)	Change management is effective and leads to improvements in the quality of service
4.1(f)	Managers are confident and visible; they are engaged, motivated, clear about their responsibilities and committed to delivery
4.1(i)	IT systems support the agency working in a joined-up way
4.2(a)	Key performance measurement and monitoring is focused on the priorities set out in the business plan
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
4.6(a)	All staff are treated with respect and value each other's diversity
4.6(b)	Managers at all levels demonstrate effective leadership on equality and diversity and the agency's commitment to it
4.7 (a)	Strategies and plans are communicated throughout the organisation and to partners
4.7 (b)	Up to date working guidance and manuals are accessible and communicated to staff
4.7 (c)	Staff understand key objectives and values of the organisation

Appendix 2 Border Intelligence Service Intelligence flow diagram



Appendix 3

Glossary

Allegation	An allegation is a piece of information which brings to the attention of the UKBA a perceived breach of the immigration/visa system.
Commodities	Drugs, cigarettes, money.
Compliance Exercise	A sampling and analysis of information available which is used to develop a Risk Profile.
Dashboard	The document which sets out the aims and objectives of RALON up to March 2011.
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.
Debrief	The process by which information is actively gathered and shared during routine operational work so as to increase information flows. This in turn will provide greater evidence leading to better intelligence assessments.
Decision Support Tool	Web paged based IT programme which is used to record application visa application details and assists with the identification of risk.
Entry Clearance Manager.	Manages the visa application processes.
Entry Clearance Officer	Processes visa applications.
Foreign and Commonwealth Office (FCO)	Government department responsible for promoting British interests overseas and supporting British citizens and businesses around the globe.
Firecrest	IT system used by the Foreign and Commonwealth Office.
Government Protective Marking Scheme	A system used to ensure information and other assets are correctly managed. It governs the storage, distribution and destruction of assets and determines who is granted access to them.
Human Resources (HR)	UK Border Agency Human Resources Directorate.
International Liaison and Intelligence Directorate (ILID)	UK Border Agency directorate responsible for coordinating the work of the Risk & Liaison Overseas Network (RALON).
Immigration Liaison Assistant (ILA)	UK Border Agency job title.
Immigration Liaison Manager (ILM)	UK Border Agency job title which encompasses posts previously known as Airline Liaison Officers (ALOs) and Risk Assessment Managers (RAM).

Immigration Liaison Officer (ILO)	UK Border Agency job title.
Inadequately Documented Passengers	Passengers seeking to travel without the correct documentation for entry to the UK e.g. without a valid visa or with false documents.
Intelligence Constitution	It is the key point of reference for staff working within the intelligence network. The Constitution sets out nine key principles which govern how the UKBA should go about the task of collecting, analysing and passing on intelligence.
Locally Employed Staff	Staff recruited directly by the British Embassy or High Commission in the country where they are employed.
Manual of Standards	This document sets out the procedures for the recording and dissemination of intelligence material.
Mycroft	IT system used by UK Border Agency to collate and manage intelligence
Nine Principles	To direct and guide the creation and delivery of the UK Border Agency Intelligence Service.
PMR	Post Monthly Report.
Police Referral Programme	A joint programme with the host police force to take action against visa applicants who submit forged documents or fraudulent travel or supporting documents or passengers who present false documents at airports.
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.
Region	South Asia and Gulf Region ⁵
Risk Profile	An outline that determines the relative potential harm (to the UK of a visa applicant / travelling passenger) based on characteristics of an individual when compared to existing evidence of adverse activity either in the UK or overseas.
Security and intelligence Services	UK security and intelligence agencies which protect the UK's national security and economic interests.
Settlement Application	Application to come to the UK on a permanent basis, most commonly as the spouse or other dependent of a British Citizen or a UK resident.
Serious Organised Crime Agency (SOCA)	An Executive Non-Departmental Public Body of the Home Office responsible for proactive operations against serious and organised crime.
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.
Statements of Business Interest	A document which sets out in brief the aims and responsibilities of the Border Force, Immigration Group and International Group and identifies key areas where support can be provided by each department.

⁵ The Region was restructured on 6 April 2010 and is now called Gulf, Iran and Pakistan

Strategic Threat Assessment (STA)	A document which describes and assesses the threats to the UK border from irregular migration, organised crime, terrorism and smuggling and considers how these threats might develop.
Tasking and co-ordination group (TCG)	A system to prioritise threats, set objectives and plan resources and action at all levels of the organisation. In essence, a business process supported by intelligence.
Transformation Journey	The ILID strategic plan to transform the organisation into an effective and efficient intelligence organisation as part of the Border Intelligence Service.
United Kingdom Border Agency (UKBA)	Executive Agency of the Home Office responsible for securing the UK border and controlling migration in the UK.
Upstream Intervention	Action taken to tackle immigration abuse at source (as opposed to action at the UK Border). Police Referral Programmes (see above) are an example but includes all overseas law enforcement activity against immigration fraud, smuggling and human trafficking.

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