



Home Office

The Home Office response to the Independent Chief Inspector's report:

## **An Inspection of Border Force Operations at Coventry and Langley Postal Hubs**

March – July 2016

The Home Office thanks the Independent Chief Inspector of Borders and Immigration for this report.

The Postal Command sits within Border Force's Central Region and operates from two sites. The volume of parcels and packets arriving from across the world runs into many thousands on a daily basis. Border Force's aims at these two sites include halting and disrupting the flow of illicit goods into the UK with minimum impact on wider processes. It is good to note that the inspectors recognise that operations at both sites are working efficiently and effectively in difficult and unique circumstances and that Border Force has built strong partnerships with both Royal Mail and Parcelforce.

Border Force has worked hard to make improvements in the postal command over the last two years and this transformation activity, designed to create a dynamic operating model, will incorporate the implementation of all the recommendations within this report.

Border Force accepts all eight of the Chief Inspector's recommendations.

### **The Home Office response to the recommendations**

**1. Recommendation 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.

#### **1.1 Accepted**

1.2 The use of agency workers by Royal Mail and Parcelforce is an intrinsic part of their business model given the seasonal nature of their work. Discussions are already underway to ensure that there is continuity of staff, with the appropriate training and security clearance, working within Border Force areas at all times. To consolidate this approach it will be set out in an action plan to be agreed and implemented between Border Force and Royal Mail by November 2016.

**2. Recommendation 2** - Ensure that the appropriate authorisation is in place for the continued use by Border Force Postal Command of its 'bulk seizure policy'.

### **2.1 Accepted**

2.2 The current approach to the bulk seizing of tobacco goods has been in place since 2007. Whilst HMRC has confirmed that it is content that such procedures meet both legal and policy requirements, Border Force and HMRC will review the current process and draw up a specific bulk seizure policy. Once this has been agreed, updated guidance will be published by the end of March 2017.

**3. Recommendation 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.

### **3.1 Accepted**

3.2 The safety of all Border Force Officers is of paramount importance. In Postal Command all officers receive "Manual Handling" training which is refreshed annually. Risk Assessments are also in place to mitigate any identified risks. As part of the review of the bulk seizure process in recommendation 2, the need for alternative stacking, storing and removal methods will be considered with health and safety advisors. This will be completed by the end of March 2017.

**4. Recommendation 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.

#### **4.1 Accepted**

**a.** The CDS system which is currently in its infancy will be enhanced as data from additional countries is received into the system. The accuracy of the data flow is already subject to assurance checks. These will allow any issues to be fed into the CDS system development.

**b.** The number of postal packets that are opened and cleared to proceed is significant and at present this data is not collected or recorded routinely. As part of the continuous improvement programme a review of this practice will be undertaken and a standard operating procedure to capture and assess the data will be implemented by the end of November 2016.

**c.** The Border Force led Fast Parcel Joint Border Intelligence Unit (FP JBIU), a multi-agency unit, led by Border Force, is working closely with Postal Operations to improve the collection and reporting of information by operational staff in support of wider Border Force and partner law enforcement activity. This will include developing the use of operational risk forums and tasking groups to identify intelligence requirements.

**4.2** The new Border Force Target Operating Model includes a section on intelligence handling, a key element of which is to have access to an intelligence platform (Single Intelligence Platform) that will enable the frontline to have direct access to Border Force (and Immigration) intelligence. This platform will be rolled out to key elements of the Border Force frontline by the end of the financial year.

**5. Recommendation 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.

**5.1 Accepted**

5.2 The Fast Parcel Joint Border Intelligence Unit (FP JBIU) is a multi-agency unit, led by Border Force, providing an intelligence-led coordinated approach to the threats posed to the UK Border by the use of fast parcel and postal traffic.

5.3 FP JBIU works closely with partners to coordinate intelligence and operational activity. This includes the collection, enhancement and dissemination of intelligence within postal operations to support both strategic decision making and tactical operational activity.

5.4 A review of the intelligence approach for postal operations will be undertaken to ensure that it is relevant and timely and that there are appropriate mechanisms for feedback. This review will be concluded by the end of December 2016.

**6. Recommendation 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.

**6.1 Accepted**

6.2 Border Force will work with law enforcement partners to increase the number and quality of referred detections and seizures. It is important to note that the decision to adopt, investigate and prosecute rests with partner agencies.

6.3 From 1 October 2016, the Fast Parcel Joint Border Intelligence Unit (FP JBIU) assumed national responsibility for managing the referral of all Fast Parcel and Postal seizures undertaken by Border Force to law enforcement partners for adoption and prosecution as appropriate. This will provide national oversight for the delivery of a standardised process of referral and follow up of outcomes.

6.4 A review of this referral process will be undertaken after the first six months of the operation and will include adoption rates by law enforcement partners.

**7. Recommendation 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 handling of such information.

#### **7.1 Accepted**

7.2 Border Force has a power to disclose information made for the purposes of a customs function under section 16(3) (a) of the Borders, Citizenship and Immigration Act 2009. The agreement in place with Royal Mail will be urgently reviewed (by the end of October 2016) to ensure it is compliant and fit for purpose.

**8. Recommendation 8** – Review internal communications at Coventry and Langley and make sure 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.

#### **8.1 Accepted**

8.2 A review of all internal communications will be undertaken at Coventry and Langley by the end of November 2016. Full briefings will continue to take place prior to any exercise, operation or pilot commencing and, where appropriate, regular updates will be communicated to all staff on the progress of any pilot or ongoing exercise through to its conclusion.