

# An inspection of the Border Force intelligence functions at the Humber ports

(June 2022 - November 2022)

### **David Neal**



(June 2022 – November 2022)



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# **Foreword**

Protecting national borders is perhaps the number one function of the state. Critical to this is timely, accurate, and accessible intelligence. To be effective, intelligence must be high quality, gathered from multiple sources, and developed into intelligence products which are actioned internally and by partners. Such activity is, by nature, joint and multi-agency. Similarly, inspection of that activity cuts across borders and, to be effective, should be approached in a joint manner. Having undertaken to inspect this area in my 2022-23 programme, and after recruiting staff with an understanding of this environment, I sought assistance from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to ensure I was able to conduct a rich and detailed study.

I chose to focus this inspection on the Humber ports in order to provide context for the changes being made in Border Force intelligence at a national level, and points for comparison during future inspections.

There is much going well in this area, and the creation of a Home Office Intelligence Directorate is the biggest moving part. It requires particular strategic focus to ensure that staff are not diverted to the latest crisis and senior managers have the time and space to deliver a complex change programme. Provided the plan for the new Directorate is fully implemented and given the resources and investment required, this is a good news story and will help Border Force achieve its ambition of being an intelligence-led organisation. More widely, the Home Office needs to sort out the longer-term command and control of its frontline delivery organisations to ensure they can realise the potential promised by the change programme and contribute in the most effective way to securing the country's border.

I have met some exceptionally capable staff at all grades who have a real propensity for this kind of work. They must be invested in, encouraged, empowered, and accredited by an energised professionalisation programme if they are to realise their full potential and be retained by the organisation.

A decision was taken to close PIONEER, which was a Border Force Intelligence change programme, earlier than scheduled and transition this into Minerva, which is a cross-cutting Home Office Intelligence Transformation programme. This needs leadership and strategic grip so that the workforce is clear about the direction of travel. Without an effective intelligence system our border is vulnerable, and the Home Office needs to ensure that all parts of the system work together.

In July 2022, Alexander Downer reported to the Home Secretary on the effectiveness of Border Force, and the findings of this inspection echo many of his. Poor intelligence at the border puts us all at risk and must be afforded a superior priority.

This report makes seven recommendations. It was sent to the Home Secretary on 18 January 2023.

David Neal

Independent Chief Inspector of Borders and Immigration

# 1. Key findings

### **Business transformation**

- 1.1 Border Force's intelligence function was restructured in the PIONEER transformation programme following an independent review which was published in 2019. This introduced a new target operating model which moved its approach from regional intelligence units to modal hubs with a national remit to enable easier analysis of modes of travel and threats.
- 1.2 A decision was taken to close PIONEER at the end of March 2022. PIONEER delivered a number of workstreams completely but after the announcement of the HO Intelligence (HOI) merger, a decision was made to only deliver a minimum viable product (MVP) in remaining workstreams. These MVPs set the foundations for further change under the MINERVA programme. Inspectors found that PIONEER had engendered closer working between targeters and developers, and had reduced siloed working between teams within the same modes.¹ However, some staff claimed it had also created barriers between the different modes and had impacted negatively on engagement between developers and Border Force frontline staff. The role and remit of collection staff, particularly in the Humber ports, was unclear and should be clarified to maximise their potential.²,³
- 1.3 The lessons learned from PIONEER identified improvements for future programmes which should be considered as the merger of the Border Force and Immigration Enforcement intelligence functions progresses under the MINERVA programme. The end state of MINERVA needs to be more clearly communicated to staff and managers, acknowledging the 'change fatigue' in Border Force staff. Staff will need to be engaged in a sensitive and timely manner to ensure their buy-in to this next period of transformation.<sup>4</sup>

# National Intelligence Model and the intelligence cycle

- 1.4 Inspectors sought to establish how Border Force followed the National Intelligence Model (NIM) to enable it to be more 'intelligence-led'. They found that intelligence flows had improved within modes as a result of the PIONEER programme restructure. However, they also heard that intelligence flows between partner agencies and industry stakeholders needed to improve.
- 1.5 Issues were identified with the lack of training provided to some collection staff in Hull, which meant they were unable to access key functions on an IT system and fulfil their roles effectively.

<sup>1</sup> Intelligence officers can encompass different capabilities, including targeting, collection, and intelligence development.

<sup>2</sup> The Humber ports are defined as Grimsby, Immingham, Hull, and Goole, but also include smaller ports such as New Holland and Killingholme.

<sup>3</sup> The Home Office, in its factual accuracy response, stated that the role of collection was communicated to all staff. "Some staff may have felt that they were not informed of how the role would work but communications went out with regularity across the business. There were briefings, weekly programme updates, all-staff dial ins and awareness sessions."

<sup>4</sup> The Home Office, in its factual accuracy response, stated: "The message that HOI was to be a single merged intel capability was clearly communicated, what was not communicated at the time was the 'how' this would be delivered, as this was still being worked through."

- 1.6 Inspectors identified that new intelligence was on occasion distributed to different teams without a clear framework for its ownership. This created time-consuming deconfliction checks and resulted in a duplication of effort.
- 1.7 Agency staff working on the frontline did not always have access to intelligence to enable them to protect the border and safeguard individuals. A review of the intelligence-sharing policy is required.
- 1.8 Of greater concern was the fact that cumbersome IT processes contributed to a fall in the number of intelligence submissions from frontline staff. Inspectors identified a need for managers to provide support, encouragement, and oversight to ensure intelligence is submitted by frontline staff in a timely and effective manner.<sup>5</sup>

# The Border Force intelligence tasking process

- 1.9 Inspectors observed that the 'Border Force Control Strategy' and threat assessments were developed through effective engagement and collaborative working with partners. These products enabled senior managers to identify the priorities for Border Force in securing the border and protecting the public. Inspectors found that the control strategy and updates to it were communicated effectively to Border Force staff.
- 1.10 At the strategic level, partners told inspectors they were engaged in the tasking and coordination process and that intelligence products were shared effectively. There had been issues around the regularity of the strategic tasking meetings and a lack of continuity in the meeting chair. Inspectors noted that Immigration Enforcement did not send a representative to the Strategic Tasking and Co-ordination Group.
- 1.11 Inspectors were provided with documents to show that agile threat assessments were used by the tactical tasking and co-ordination meetings. However, the terms of reference for this meeting needed updating and the recent change to the meeting structure, which excluded external partners, had not been fully understood by some of them. Further communication and engagement with external partners were required to explain the reasons behind this change.
- 1.12 Inspectors found that the main issues with the tasking and co-ordination process were at the operational tasking and co-ordination level. The process was bureaucratic, and the Operational Intelligence Tasking and Co-ordination Group meetings did not formulate any intelligence responses or tactical assessments. While hot tasking was used for some time-sensitive work, inspectors found that it could be used more widely. Data used to track the taskings generated at the meetings was inconsistent and showed that the volume of taskings completed was low. There was no evidence of a process to escalate taskings to the Intelligence Tasking and Co-ordination Group meetings. Senior Border Force managers recognised these issues and said they were launching a review of the effectiveness of this part of the process. It would include how to incorporate Immigration Enforcement intelligence taskings in the process as part of its merger with Border Force intelligence.

# Communication and engagement

1.13 Inspectors found that engagement between Border Force intelligence and senior representatives from law enforcement agencies (LEAs) and other government departments was

<sup>5</sup> The Home Office, in its factual accuracy response, stated: "Work is ongoing to support submissions. The Data Futures Tech Capability (DFTC) team is working with COP [Central Operations Platform] to support the frontline with guidance."

positive, and that partners viewed Border Force intelligence as a trusted partner. Relationships with partners had also been strengthened by the creation of multi-agency hubs with partners' staff embedded in Border Force teams.

- 1.14 These positive relationships were not always replicated at a local level. Industry partners at the Humber ports were keen to work with Border Force intelligence to share information but lacked a point of contact with whom to engage. Border Force intelligence needs a local point of contact, and boundaries need to be defined for engagement work carried out by frontline staff and the intelligence functions.
- 1.15 As previously highlighted, communication and dissemination of the 'Border Force Control Strategy' and its priorities was effective, with staff at a number of locations telling inspectors they were aware of it and received regular updates.
- 1.16 Knowledge of the Forward Intelligence Cell (FIC) in Hull, an extension of the Gateway Multi-Agency Hub (Gateway MAH), was inconsistent and Border Force intelligence should review the unit's name and branding. It should also undertake further engagement with staff and partners to clarify its remit.6

### Recruitment and retention

- 1.17 Inspectors found that Border Force intelligence staff were motivated, loyal, and keen to do a good job, and generally described their managers as supportive.
- 1.18 The Home Office recruitment and vetting processes are protracted, frequently resulting in successful applicants accepting other jobs while waiting for clearance.
- 1.19 The retention of trained and skilled staff is hampered by differing terms and conditions across Home Office roles and units, and higher rates of pay for similar roles in other LEAs. While senior managers said they were exploring the introduction of a recruitment and retention allowance for some intelligence roles, inspectors were doubtful as to whether it could be implemented. Payment of such an allowance had been an issue for a number of years and approval was outside the Home Office's control.
- 1.20 Inspectors found that one of the anticipated benefits of the PIONEER target operating model – to flex staff across Border Force intelligence – had not yet been realised. [Redacted]. Intelligence staff had been used to support other areas of Border Force business, usually on a voluntary basis and with limited impact on intelligence work, although this is not common practice. While this provided opportunities for individuals, the lack of frontline training provided to intelligence staff made it harder for Border Force intelligence to support frontline functions and for Border Force as a whole to deploy its resources effectively.
- In addition, frontline resources are stretched, [redacted].<sup>7</sup> Inspectors also found that some 1.21 frontline staff were demotivated.

<sup>6</sup> The Home Office, in its factual accuracy response, stated: "This work is already underway through the MAH [multi-agency hub] governance board as well as comms with partners and the MAH membership. We have never referred to the FIC [Forward Intelligence Cell] as a separate MAH, however the branding introduced by Border Security Strategy Unit (who chair the MAH Board) did cause some confusion."

# **Training and accreditation**

- 1.22 Inspectors found that the provision and availability of training varied across the different functions in Border Force intelligence. In some areas, such as the analysis function, staff outlined the training available to them and the accreditation pathways they could follow, and said that attendance on training courses was not an issue. However, some collection staff in Hull had been in post for up to eight months and had not undertaken their full training, meaning they were unable to perform key tasks. Their powers and remit were also unclear to them. A manager said that given the time it took to recruit new staff, they were keen to appoint staff to roles and would take the 'hit' in terms of waiting for them to be trained. Staff in other functions said that resourcing issues meant it was not always possible to release staff to undertake training.
- 1.23 Inspectors noted that senior managers were not fully aware of some concerns around the lack of training. While the design and provision of training sat outside the remit of the MINERVA programme team, the reliance on training co-ordinators and working groups to raise training requests and escalate issues to senior managers appeared not to be working.
- 1.24 The ability of Border Force intelligence staff in areas outside the analysis function to follow an accreditation pathway had stalled in recent years. Senior managers acknowledged this and were taking steps to reinvigorate it. Embedded staff from other LEAs also questioned the rigour of the process followed by Border Force intelligence staff to attain certain types of accreditation, but this was disputed by senior managers.<sup>9</sup>

### **Tools**

- 1.25 As highlighted in previous ICIBI inspections and other reviews of Border Force and Border Force intelligence, inefficient IT systems and processes, and a reliance on other agencies' data, hinder the effective collection and creation of intelligence. Although new systems are being introduced, they are either behind schedule or are not delivering promised functionality, creating disaffection amongst staff and delaying the realisation of benefits.<sup>10</sup>
- **1.26** Staff shortages, inadequate equipment provision, and lack of training for frontline staff all have an impact on intelligence-led targeting and the ability to operationalise intelligence. [Redacted].

# Performance management and assurance

1.27 Other than the revenue protection targets set annually for Border Force by HM Treasury, the Home Office told inspectors that no Border Force Intelligence Directorate (BFID) staff were set individual performance targets for their work. While inspectors acknowledged the balance needed between quantity and quality, it was difficult to understand how staff were assessed

<sup>8</sup> The Home Office, in its factual accuracy response, stated that these staff "were never tasked to work outside of their experience or knowledge levels and were monitored throughout this period".

<sup>9</sup> The Home Office, in its factual accuracy response, stated: "The Capability Team advises, however, that a pathway for Collection is in place consisting of the Intel Foundation Course, Collection Fundamentals Part 1, Collection Fundamentals Part 2 (almost complete), [redacted] and Write to Share as well as PNC [Police National Computer] and PND [Police National Database] training. Allocation of places is determined by the business who are [sic] responsible for identifying demand and priority and releasing trainer resource. In addition, a workstream has been initiated to 'reboot' IPP [Intelligence Professionalisation Programme] accreditation, which was not previously mandated for BFID."

<sup>10</sup> The Home Office, in its factual accuracy response, stated: "The DFTC [Data Futures Tech Capability] team have worked closely with the URMH [Unaccompanied RoRo Modal Hub] to ensure they have the relevant support and reporting dashboards for COP [Central Operations Platform]. They have been provided with user journeys to make it easier for them to key in the data."

- on their performance given the absence of any targets. Senior managers said this was an issue they were seeking to address. <sup>11</sup>
- 1.28 There was a better picture on assurance. Inspectors observed and were informed about good levels of assurance being undertaken, which managers used to identify training gaps and improve the quality of work produced. However, they noted that central co-ordination of internal reviews and lessons learned would enable sharing of best practice and prevent a siloed approach.
- **1.29** [Redacted].<sup>12</sup>
- 1.30 The quality of Home Office IT systems and their data adversely affects the production of management information. Officers and managers told inspectors that systems were difficult to use, and inputting statistics took a long time, leading to a risk that staff failed to input data. The potential impact could mean that senior managers do not have accurate data on the interdictions at the border, with the outcomes of intelligence-led targeting produced by Border Force intelligence not fully known.

<sup>11</sup> The Home Office, in its factual accuracy response, stated: "We will not be setting individual performance targets and will be addressing the point by introducing an overarching directorate performance framework."

<sup>12 [</sup>Redacted].

# 2. Recommendations

### The Home Office should:

### **Recommendation 1**

Review the policy, process, and guidance for the management and dissemination of intelligence to ensure:

- clear ownership of new intelligence to remove time-consuming deconfliction enquiries and prevent duplication of effort
- agency staff have access to intelligence in a usable format to enable them to action it effectively

### Recommendation 2

Review the tasking process at the Operational Intelligence Tasking and Co-ordination Group (Ops ITCG) to improve its effectiveness, including:

- provision of a clear escalation mechanism to the Intelligence Tasking and Co-ordination Group (ITCG)
- empowering managers to task across functions outside the existing meeting structure
- maintaining accurate records of taskings and developing an accountability mechanism to assess outcomes

### **Recommendation 3**

Work with the Multi-Agency Hub Strategic Governance Board to review the identity and branding of the Forward Intelligence Cell (FIC) in Hull and undertake engagement to improve the understanding of its role by staff and stakeholders

### **Recommendation 4**

Review the collection function to improve tasking volumes and relationships with other intelligence functions within Border Force intelligence and frontline functions, including:

- an assessment of the effectiveness of its geographical structure and how it aligns with the target operating model's modal structure
- reviewing and agreeing the powers conferred on collection officers and ensuring equity of powers for all officers
- reviewing the training and accreditation provision for collection officers, ensuring staff are trained on commencement of their role (in line with recommendation 6)
- ensuring there is sufficient management oversight of collection officers

### **Recommendation 5**

Review the communications strategy for the MINERVA programme to ensure that the end state of MINERVA and how it will be delivered is clearly defined and communicated to staff

### The Home Office should:

### **Recommendation 6**

Review the training and accreditation provision for Border Force intelligence staff to:

- ensure training and accreditation pathways are agreed and in place for all intelligence roles
- ensure staff receive role-specific training on commencement of a new role
- ensure there are effective and well-utilised escalation routes to senior managers for training course and staff availability issues
- compare the training and accreditation pathways delivered by other law enforcement agencies to ensure equity and consistency

### **Recommendation 7**

Continue to review the tools and technology used by intelligence officers and frontline staff to maximise the benefits of intelligence and targeting opportunities by:

- ensuring they enable staff to undertake their roles efficiently and effectively
- implementing mitigations and delivery plans where operational limitations or delays to delivery are identified

# 3. Background

- In his '2022-23 Inspection Plan', the Independent Chief Inspector of Borders and Immigration (ICIBI) set out his intention to conduct an inspection of intelligence.<sup>13</sup> As the creation of Home Office Intelligence was in its infancy at the start of this inspection, it looked at the effectiveness and efficiency of Border Force intelligence and how it works with other law enforcement agencies (LEAs), focusing on the outcomes of actionable and timely intelligence at the Humber ports.
- 3.2 For Border Force, there are a number of key ports on the east coast, including the Humber ports. The Humber ports consist of the Port of Hull, the Port of Grimsby, the Port of Goole, and the Port of Immingham. They handle around 17% of the UK's trade and almost 25% of UK seaborne trade, including materials that supply 10% of the nation's energy and 25% of the UK's vehicle fuel. 14,15
- 3.3 The government announced in March 2021 that Freeport status would be granted to the Humber ports. The Freeports model includes a package of measures, comprising tax reliefs, customs, business rates retention, planning, regeneration, innovation and trade and investment support.<sup>16</sup>
- 3.4 The Humber ports are run by Associated British Ports, with services for freight, car, and passenger transport. This inspection looked at Roll-on Roll-off freight, often referred to as 'RoRo freight'. RoRo freight refers to wheeled cargo, such as trucks or trailers, which are driven on and off a ship, either on their own wheels or using a platform vehicle. Where a driver is present, for example in a lorry, it is referred to as 'accompanied RoRo'. Where there is no driver and the trailer has to be collected, it is referred to as 'unaccompanied RoRo'. At the Humber ports, unaccompanied RoRo freight is the most prevalent.
- 3.5 The Independent Chief Inspector also set out his intention for His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to assist the inspection, recognising that they hold an important relationship with the LEAs supporting Border Force intelligence.
- 3.6 HMICFRS resource supported the inspection by providing a view on strategic and tactical documents, accompanying ICIBI inspectors on familiarisation visits, contributing to the design and delivery of question sets, attending and analysing interviews, and providing assurance by reviewing the draft inspection report.

<sup>13</sup> Independent Chief Inspector of Borders and Immigration, 'ICIBI Inspection Plan 2022-23', (published 1 April 2022), <a href="https://www.gov.uk/government/publications/icibi-inspection-plan-2022-23">https://www.gov.uk/government/publications/icibi-inspection-plan-2022-23</a>

<sup>14</sup> Humber Freeport, 'Humber Freeport Britain's Global Gateway', <a href="https://humberfreeport.org/">https://humberfreeport.org/</a>

<sup>15</sup> Associated British Ports, 'Humber Estuary Services', <a href="https://www.humber.com/Estuary\_Information/Navigating\_the\_Estuary/Vessel\_Traffic\_Services/">https://www.humber.com/Estuary\_Information/Navigating\_the\_Estuary/Vessel\_Traffic\_Services/</a>

<sup>16</sup> Department for Levelling Up, Housing and Communities, 'Freeports', (published 27 October 2021), <a href="https://www.gov.uk/guidance/freeports#whatare-freeports">https://www.gov.uk/guidance/freeports#whatare-freeports</a>

### **Border Force**

- 3.7 Border Force is a law enforcement command in the Home Office. It secures the border and promotes national prosperity by facilitating the legitimate movement of individuals and goods, while preventing those that would cause harm from entering the UK. This is achieved through the immigration and customs checks carried out by staff at ports and airports.<sup>17</sup>
- **3.8** The responsibilities of Border Force include:
  - checking the immigration status of people arriving in and departing the UK
  - searching baggage, vehicles and cargo for illicit goods or illegal immigrants
  - patrolling the UK coastline and searching vessels
  - gathering intelligence
  - alerting the police and security services to people of interest
- **3.9** Border Force's priorities are to:
  - deter and prevent individuals and goods that would harm the national interests from entering the UK
  - facilitate the legitimate movement of individuals and trade to and from the UK
  - protect and collect customs revenues for trade crossing the border
  - provide excellent service to customers
  - provide demonstrable effectiveness, efficiency and value for money
- **3.10** Border Force intelligence supports this work by enabling interventions through intelligence and data. It collects intelligence and data, develops it, and issues it in the form of targets to enable operational outcomes.
- 3.11 The effort is focused on the highest-harm and highest-threat commodities and people in line with the 'Border Force Control Strategy', while also protecting the vulnerable. The latest version of the strategy was issued in May 2022. It pulls together an understanding of the threats at the border, informed by Border Force and external partners, and uses a risk-scoring methodology to identify the priority of the individual threats. The intention is to ensure that intelligence generates the highest impact possible by enabling interventions at the border, overseas, and in-country by working collaboratively with partners.
- 3.12 The Border Force intelligence function has recently undergone significant restructuring with the delivery of a new target operating model under the PIONEER transformation programme. This involved the regional units being restructured and the setting up of national modal hubs composed of intelligence developers, targeters, and analysts.

# **Relevant legislation**

3.13 UK legislation facilitates collection, processing, retention, and sharing of intelligence. Legislation provides the foundation and pathways for sharing intelligence between LEAs, both in the UK and overseas (see figure 1 below).

Figure 1: Details of relevant legislation relied on to perform intelligence functions in Home Office intelligence

Legislation	Purpose
Immigration Act 1971 (inc. Schedule 2) Immigration Act 2016 Immigration, Asylum and Nationality Act 2006 Borders, Citizenship and Immigration Act 2009	Regulates entry, stay, and work in the UK. Promotes safeguarding and welfare of children
Customs and Excise Management Act 1979 (CEMA)	The collection and management of revenues and excise
Race Relations Act 1976 and Race Relations (Amendment) Act 2000	Sets out to prevent discrimination on the grounds of race, and places a duty to promote race equality
Official Secrets Act 1989	Creates offences for the unauthorised disclosure of information by government employees
Criminal Procedure and Investigations Act 1996 (CPIA)	Sets out a code of practice for conducting investigations and the handling of material obtained in a criminal investigation
Human Rights Act 1998	Sets out legal protection for human rights
Freedom of Information Act 2000	Covers a general right of access to information held by public authorities unless covered by an exemption
Regulation of Investigatory Powers Act 2000	Regulates powers for surveillance and investigation
Criminal Justice and Licensing (Scotland) Act 2010	Covers disclosure/CPIA in Scotland
Counter-Terrorism and Security Act 2015	Covers the 'Authority to Carry Scheme 2021', operated by the National Border Targeting Centre (NBTC) <sup>18</sup>
Investigatory Powers Act 2016	Governs the lawful acquisition of communications data
Data Protection Act 2018 and General Data Protection Regulation (GDPR)	Covers the processing of personal data and the processing of personal data for law enforcement purposes
The Passenger Name Record Data and Miscellaneous Amendments Regulations 2018	Implements the requirements of the EU directive on the use of passenger name record data

<sup>18</sup> The NBTC processes advanced passenger information (API) on individuals intending to travel to, or from, the UK.

# Law enforcement landscape

- 3.14 Border Force is a law enforcement command and performs a crucial role in the prevention and detection of criminal activity at the border. Although Border Force officers have legal powers to stop and search, seize property, and make arrests, they rely on other LEAs to prosecute offenders through the criminal justice system. Relationships with partner LEAs are therefore important to Border Force at a local, regional, and national level.
- 3.15 There are 45 police forces in the UK, each with responsibility for a specified geographical area. Those pertinent to this inspection are Humberside, Kent, and Essex. Among other responsibilities, they seek to prevent and detect crime in their policing area.
- Those police forces also contribute to the make-up of the ten Regional Organised Crime Units (ROCUs) across the UK. The ROCUs tackle cross-border organised criminality and usually cover several police force geographical areas. For example, Yorkshire and the Humber ROCU supports the police force areas of West, South and North Yorkshire, as well as Humberside.
- **3.17** The National Crime Agency (NCA), Counter-Terrorism Policing (CTP) and His Majesty's Revenue and Customs (HMRC) all have a national remit:
  - The NCA has primacy for the trafficking of criminal commodities such as vulnerable people, guns, and drugs by organised crime groups. Securing the UK's borders is a priority for the NCA.<sup>19</sup>
  - The CTP network is a collaboration of UK police forces working with the UK intelligence community to help protect the public and national security by preventing, deterring, and investigating terrorist activity.<sup>20</sup>
  - HMRC is a non-ministerial department of the UK government responsible for the collection
    of taxes and has powers to investigate and take civil and criminal enforcement action
    against those whose conduct seeks to deprive the UK public revenue.

# **Previous ICIBI inspections**

- **3.18** The ICIBI has conducted a number of inspections relating to Border Force's intelligence work.
- 3.19 In 2016, the ICIBI inspected the efficiency and effectiveness of the intelligence functions of Border Force and Immigration Enforcement.<sup>21</sup> The ICIBI found that:
  - both Immigration Enforcement and Border Force had developed and implemented the key components of the National Intelligence Model (NIM), however some elements of the NIM were either missing or not working effectively<sup>22</sup>
  - access to certain IT systems, needed to check whether new information connected to what was already known, was limited and uneven

<sup>19</sup> National Crime Agency, 'What we do', https://www.nationalcrimeagency.gov.uk/what-we-do

<sup>20</sup> The Counter-Terrorism Policing (CTP) website describes the function and priorities of the CTP network: https://www.counterterrorism.police.uk/

<sup>21</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of the Intelligence Functions of Border Force and Immigration Enforcement, November 2015 – May 2016', (published 21 July 2016), <a href="https://www.gov.uk/government/publications/inspection-report-of-border-force-and-immigration-enforcement-intelligence-functions-july-2016">https://www.gov.uk/government/publications/inspection-report-of-border-force-and-immigration-enforcement-intelligence-functions-july-2016</a>

<sup>22</sup> The National Intelligence Model is explained in more detail in chapter 7.

- the intelligence 'cycles' in Border Force and Immigration Enforcement involved a number of detailed processes and hand-offs. Two were particularly important to the overall efficiency and effectiveness of the intelligence function. The first concerned the receipt, initial evaluation, and distribution of new information. The second concerned how well frontline staff engaged with and supported the intelligence function<sup>23</sup>
- 3.20 In 2018, the ICIBI inspected Border Force operations at south-coast seaports.

  Recommendations were made in relation to the need to regularly risk-test RoRo freight arrivals at Southampton, as well as a representative sample of accompanied freight and tourist vehicles at all ports, and a greater proportion of commercial and non-commercial General Maritime arrivals.<sup>24</sup> A recommendation was also made that Border Force should:

"Record information about searches and other activities conducted by Border Force at and from each port in a consistent format and in sufficient detail to improve knowledge of the threats and risks and of what works best in terms of prevention and detection (including an evidenced evaluation of the effectiveness of 'hub-generated' targets and 'officer-selected' targets)."

- 3.21 In 2020, the ICIBI commenced an inspection of intelligence functions, focusing on Home Office field intelligence officers (FIOs) and their equivalent functions across the Home Office Borders, Immigration and Citizenship System (BICS).<sup>25</sup> The inspection was paused due to complications and resource issues caused by the COVID-19 pandemic. However, the inspection delivered several interim findings which were shared with the Home Office. These included:
  - Border Force and Immigration Enforcement ran entirely separate intelligence functions, with a focus on demarcation and deconfliction rather than attempts to identify potential efficiency and effectiveness gains from rationalisation
  - a lack of strategic oversight of intelligence collection, with intelligence requirements and priorities being fragmented and communicated and operationalised in silos
  - there was nothing in place to prevent duplication of effort, or to target cross-BICS
    intelligence gaps systematically, or to ensure that intelligence that was collected was seen
    by all those who might have an interest in it, and that the intelligence cycle was fed with
    follow-up requirements
  - the Home Office needed to examine whether the necessary legal gateways and bi- and multi-lateral agreements, including in relation to data protection, were in place for the intelligence it collected and shared
  - BICS had a considerable amount of work to do before it could be said to be truly 'intelligence-led'
- 3.22 In 2021, the ICIBI inspected the effectiveness of Border Force's role in Project KRAKEN at small seaports.<sup>26</sup> The inspection noted the limited effectiveness of Border Force FIOs who were tasked with conducting outreach at small seaports to highlight Project KRAKEN and building and maintaining relationships with local stakeholders. They were generally 'tasked to risk' and spent much of their time on more urgent priorities. The inspection noted that their role had

<sup>23</sup> Intelligence cycle refers to the continuous collection, development, and dissemination of intelligence.

<sup>24</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of Border Force operations at south coast seaports', (published

<sup>12</sup> November 2018), https://www.gov.uk/government/publications/an-inspection-of-border-force-operations-at-south-coast-seaports

<sup>25</sup> BICS has been superseded by the One Home Office blueprint structure which was launched on 1 April 2021.

<sup>26</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection into the effectiveness of Border Force's role in Project Kraken at small seaports', (published 27 January 2022), <a href="https://www.gov.uk/government/publications/an-inspection-into-the-effectiveness-of-border-forces-role-in-project-kraken-at-small-seaports">https://www.gov.uk/government/publications/an-inspection-into-the-effectiveness-of-border-forces-role-in-project-kraken-at-small-seaports</a>

been simplified in the summer of 2021 from the collection and development of intelligence to either the collection or development of intelligence, but despite this they remained overstretched.

# Other inspections and reviews

### **Border Force intelligence function review**

- 3.23 In 2018, an independent review of the Border Force intelligence function, [redacted], was commissioned by the then Border Force Director General.<sup>27</sup> This review, which was not published, made 30 recommendations. It found that:
  - Border Force did not have an effective intelligence business model
  - targeting work (discovering unknowns) was vital and should look at both people and freight
  - with one exception, the Joint Border Intelligence Unit (JBIU) concept was not working and the agencies working at the border needed to agree a new JBIU model
  - the Border Force Intelligence Directorate (BFID) should consider embedding strategic intelligence analysts in multi-skilled teams
  - the relationship between BFID and the frontline should be at the heart of Border Force's operational delivery but there were clear tensions that needed to be addressed
  - [redacted]
  - there needed to be more emphasis on continuous improvement work to motivate staff and engage them in improving processes and making developments to the benefit of the business
  - there was a recruitment and retention problem with BFID analysts who were paid less to do the same role as analysts in other agencies

# HMICFRS inspection of the National Crime Agency's relationship with Regional Organised Crime Units

- 3.24 In 2020, HMICFRS conducted an inspection of the NCA's relationship with ROCUs.<sup>28</sup> ICIBI inspectors reviewed this inspection to understand how different LEAs worked together, in line with the Border Force multi-agency hubs (MAHs).
- 3.25 The report found that the NCA and the ROCUs could work together better to reduce the risk of serious and organised criminality for example, by improving joint tasking procedures at a local level and developing more co-location or integration in some branch offices.
- 3.26 It also found that the teams were better integrated when they worked alongside each other. However, this was not always the case. While co-location could make integration easier, good professional relationships and strong leadership could achieve good operating integration even when co-location was not practical.
- 3.27 There were opportunities for more effective and systematic working between the two.

  This could be achieved through closer tasking and co-ordination, particularly at a local level,

<sup>27 &#</sup>x27;Border Force Intelligence Function Review' (report produced 3 February 2019), unpublished.

<sup>28</sup> His Majesty's Inspectorate of Constabulary and Fire & Rescue Services, 'An inspection of the National Crime Agency's relationship with regional organised crime units', (published November 2020), <a href="https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/an-inspection-of-the-national-crime-agencys-relationship-with-regional-organised-crime-units.pdf">https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/an-inspection-of-the-national-crime-agencys-relationship-with-regional-organised-crime-units.pdf</a>

and aligning the processes for prioritising threat more closely. Co-location, integration, and interoperability were all opportunities that should be explored.

### **Independent review of Border Force**

- 3.28 In February 2022, the Home Secretary appointed Alexander Downer to undertake an independent review of Border Force to ensure it was "operating as effectively and efficiently as it can, and as it needs to for the future". This was in response to an escalation of the complexity and scale of the challenge at the border over the previous 18 months which was attributed to the COVID-19 pandemic, the post-EU Transition period and an evolving threat and risk picture including channel crossings.
- 3.29 The review made 32 recommendations across the range of Border Force work, many of which align with the findings of this inspection, such as recruitment and retention of staff, training and development pathways, access to data and tools, measures of success, and engagement with partners.<sup>29</sup>

# The Border Force response to inspections and reviews

### **PIONEER programme**

- 3.30 In response to the 'Border Force Intelligence Function Review' of 2019, Border Force launched the PIONEER transformation programme in July 2020.
- 3.31 The Home Office set out a list of strategic drivers for the PIONEER programme in its 'PIONEER Delivering the Border Force Intelligence Directorate Target Operating Model (TOM)' presentation, which was provided to inspectors. In addition to recommendations in the 'Border Force Intelligence Function Review' of 2019, it included the need for a more dynamic threat-focused model with better intelligence flows, improved partner collaboration, and better exploitation of data and technology.
- 3.32 Previously, BFID was structured around a regional leadership and operating structure. Intelligence development was conducted in intelligence operations teams, known as regional intelligence units, MAHs and targeting hubs with a national remit. The Home Office told inspectors that this resulted in teams being siloed and not working together effectively.
- **3.33** Field intelligence officers (FIOs) previously carried out both field intelligence and development work. The Home Office told inspectors that this resulted in a "fragmented approach to both collection and development capabilities", teams were "mainly siloed in nature" and were not working with wider Border Force teams to address intelligence requirements.
- **3.34** [Redacted].
- 3.35 Some MAHs had been Border Force-led units that included staff from other LEAs, while others were run by partner agencies and included Border Force staff. The Home Office told inspectors that there was no consistency in how the MAHs were run and it was difficult for Border Force to prioritise across different modes and threats.

# **PIONEER target operating model**

**3.36** The vision of the PIONEER programme was to:

"Create an agile and flexible organisation which enables us to operate as one team, with greater focus, accuracy, and effectiveness by creating a responsive, valuable, national intelligence-led capability that eradicates siloed behaviours and can respond to the dynamic nature of threats at the UK border."

- **3.37** Under PIONEER, BFID transitioned to a 'modal leadership' and operating structure. Modal hubs and MAHs had a national remit but were focused on specific 'modes' of transport of goods or people, or specific threats.
- **3.38** Figure 2 illustrates the basic structure and key functions of BFID under the PIONEER programme, based on the Home Office 'High-level BFID structure and modal commands diagram'.

Figure 2: PIONEER target operating model structure [Redacted].

# **BFID Strategic Centre**

3.39 The BFID Strategic Centre comprises functions such as the Border Force National Intelligence Hub (BFNIH), Command and Control Unit (CCU), Tasking and Co-ordination, Strategic Analysts, Business Management Unit, and Capabilities and Change Projects. The BFNIH and CCU were of particular interest during this inspection as detailed in figure 3 below.

### Figure 3: BFNIH and CCU

### **Border Force National Intelligence Hub**

Border Force National Intelligence Hub (BFNIH) is a 'twenty-four seven' team that acts as the single point of contact (SPOC) for external UK and international LEA partners to share operational intelligence with Border Force. It also acts as the SPOC for online public allegations and a triage point for intelligence from frontline officers.

### **Command and Control Unit**

The Command and Control Unit (CCU) is a unit within BFNIH. It provides operational support to the strategic, tactical, and operational tasking and co-ordination process. The Tasking and Co-ordination Groups process is discussed in chapter 8. A CCU manager described CCU as "a bit of a funnel in the middle", identifying who needs to see tactical and operational information and disseminating it accordingly.

### **Intelligence commands**

- **3.40** [Redacted].<sup>30</sup>
- **3.41** This inspection focused on the Maritime Intelligence Command. [Redacted].

Targeting, development, collection, and analysis capabilities are the core functions which support BFID. In dividing the intelligence remit into these functions, the PIONEER model envisages a "nationally focused delivery of border protection based on strategy and priorities" rather than regional units and commands covering all intelligence roles simultaneously.

# **Intelligence capabilities**

### **Targeting**

- 3.43 The 'Border Force Targeting Strategy', an internal document dated December 2021, states that targets are identified "by applying intelligence-led risk-based rule components to bulk data and then categorising qualitatively".
- **3.44** [Redacted].

### **Development**

- **3.45** [Redacted].
- **3.46** It was intended that the development capability would "increase focus, efficiency and effectiveness enabling the identification and management of risk and resources".
- **3.47** [Redacted].

### **Intelligence Analysis & Assessment**

- 3.48 The Intelligence Analysis & Assessment (IA&A) capability delivers the strategic, tactical, and operational intelligence analysis and assessment capability using a network of intelligence analysts co-located with intelligence staff across the UK. It leads on the 'Border Force Control Strategy', which assesses and prioritises threats and commodities using the 'Management of Risk in Law Enforcement' (MoRiLE) framework to underpin risk-based decision making across Border Force.
- **3.49** Analysts work to support the flow of intelligence and to identify patterns and trend changes [redacted].
- **3.50** Analysts work on strategic intelligence products, such as quarterly and annual threat assessments. They also feed into intelligence products owned by other LEAs, such as the NCA or HMRC. [Redacted].

### Collection

**3.51** The 'Collection Strategy' describes collection as the "necessary and proportionate collection of information, data and intelligence directed by a strategic and tactical tasking co-ordination structure". [Redacted].

# **One Home Office**

3.52 In April 2021, the Home Office launched a new transformation programme called 'One Home Office' (OHO). Its aims are to:

"Build an organisation that can achieve more for the people we are here to serve, which is more flexible, resilient and outward-facing and better equipped to respond to changing circumstances. It will make the Home Office a better place to work for our staff and it will mean better, more customer-focused services and outcomes for the public."

- 3.53 As part of this transformation, the Home Office developed an outcome delivery plan (ODP). This was different from previous departmental plans as it changed the Home Office focus to delivering outcomes (described as measurable results that help to see if what was done brought any value or change), rather than outputs (described as showing something is done, for example delivering a project, policy or process).
- **3.54** The priority outcomes for 2021-22 were to:
  - 1. "Reduce crime
  - 2. Reduce the risk from terrorism to the UK and UK interests overseas
  - 3. Enable the legitimate movement of people and goods to support economic prosperity
  - 4. Tackle illegal migration, remove those with no right to be here, and protect the vulnerable"<sup>31</sup>
- 3.55 Under the OHO blueprint, Border Force and Immigration Enforcement would be merged into one capability called 'Borders and Enforcement', overseen by a single director general, but it was subsequently decided to maintain two separate directors general for each directorate.
- 3.56 Border Force and Immigration Enforcement have traditionally had separate intelligence directorates, but as part of the OHO transformation, the MINERVA programme was launched in April 2022. It will bring together Border Force Intelligence Directorate and Immigration Intelligence to form Home Office Intelligence in the new Borders and Enforcement capability.

# **MINERVA** programme

- 3.57 The intention is that the MINERVA programme will focus on integrating people, processes, technology, and information over the next two to three years. This change is driven by the recognition that while Border Force and Immigration Enforcement worked as separate but collaborative organisations, as a single organisation they would build on those successes and expertise to have a greater impact on criminality and high-harm threat.
- 3.58 The move away from a single director general for Borders and Enforcement has raised questions about the future of the MINERVA programme and the creation of Home Office Intelligence. A senior leader told inspectors that there had to be a question mark over the future of Home Office Intelligence as an entity given this decision. A senior intelligence manager said that the decision made the MINERVA end state, "harder to articulate" and that it "muddies the water". Rather than a clear single hierarchy with one control strategy, there could be two of each. Another senior manager told inspectors, "The challenge is how the senior leaders will work together" and "it will come down to who has the loudest voice". 32
- **3.59** [Redacted].

<sup>31</sup> Home Office, 'Home Office Outcome Delivery Plan: 2021 to 2022', (published 15 July 2021), <a href="https://www.gov.uk/government/publications/home-office-outcome-delivery-plan">https://www.gov.uk/government/publications/home-office-outcome-delivery-plan</a>

<sup>32</sup> The Home Office, in its factual accuracy response, stated: "This is strongly refuted by Home Office Intelligence senior officials. There is a programme of work needed to greater align the former II and BFID functions and teams, with clear messaging that the vital work of intelligence supports all the DGs rather than a focus on any specific DGs. The Minerva programme will help to communicate that message more clearly over the coming weeks/months."

### Figure 4: Operating Model – Deliver

[Redacted].

# 2025 UK Border Strategy and Border Force 2025

- 3.60 The government's '2025 UK Border Strategy' was published in December 2020.<sup>33</sup> The strategy sets out the vision for the UK border to be the most effective in the world and one which embraces technology and simplifies processes for those using it while also improving the security of the UK.
- 3.61 Linked to this is 'Border Force 2025', which sets out the value of Border Force's work, its core objectives and outlines how they will be delivered, with plans to increase the proportion of positive interventions at the border as a result of intelligence and risk-based targeting.<sup>34</sup> All of this will contribute to the ambition to have the world's most effective border that creates prosperity and enhances security for a global United Kingdom. 'Border Force 2025' also aligns the strategic ambition to the wider 'One Home Office' transformation plans, joining up the thinking and prioritisation in Borders and Enforcement.
- **3.62** The strategic outcomes of the 'Border Force 2025' objectives are set out in three specific areas.
  - 1. **Protect** the border against threats through targeted interventions and reducing border vulnerabilities, while safeguarding vulnerable individuals.
  - 2. **Facilitate** legitimate trade and travel, enhance the UK's reputation as a place to do business and visit, while supporting the integrity of the economy.
  - 3. **Adapt** through innovation and partnership working, and improve efficiency by investing in staff and equipment.

<sup>33</sup> Cabinet Office, '2025 UK Border Strategy' (published 17 December 2020), https://www.gov.uk/government/publications/2025-uk-border-strategy

<sup>34 &#</sup>x27;Border Force 2025' is an internal Border Force document that was published on the Home Office intranet.

# 4. Scope

- **4.1** This inspection focused on the Border Force intelligence functions at the Humber ports, including:
  - the Border Force intelligence strategy for collecting, developing, targeting, handling, and analysing intelligence, and how the strategy is communicated to and operationalised by staff at the Humber ports
  - the Border Force intelligence tasking process, including handoffs to law enforcement agencies (LEAs) for intelligence development

### **4.2** It also considered:

- the interfaces between Border Force intelligence and other LEAs, including their understanding of the Border Force intelligence strategy, whether their strategies align, and how they work practically and operationally
- the resourcing, training, skills, and systems supporting Border Force intelligence operations
- engagement with local stakeholders to gather intelligence and enhance the understanding of threats and opportunities by Border Force intelligence
- the effectiveness of intelligence targeting at the Humber ports, including volumes, quality, and outcomes
- **4.3** The inspection scope did not include:
  - consideration of the 'insider threat' at the Humber ports
  - consideration of the physical security of the Humber ports
  - use of the police effectiveness, efficiency and legitimacy (PEEL) methodology used by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to assess police forces
- **4.4** The scope can be summarised as shown in the diagram at figure 5.

# Figure 5: Inspection scope

tools for the job? Right people and hub/FIOs - with a focus on the Ro-Ro mode MAH/modal resources, skills, systems Intelligence partners and multi-agency hubs **Border Force intelligence** intelligence sharing protocols with BF Test the practical application and knowledge of the strategy and NCA - ROCU - CTP - IE - HMRC Onsite - Humber ports infrastructure Onsite staff strategy and tactical plan compatible with the relationship the LEAs? Does disseminating BF strategy intelligence developing work? Strategy for: collecting actioning handling

# 5. Methodology

### **5.1** Inspectors:

- conducted research using open source material, including published reports and Home
   Office guidance available to staff
- published a 'call for evidence' on the ICIBI website on 16 June 2022, inviting contributions from anyone with knowledge or experience of the Border Force intelligence functions at the Humber ports, and analysed the 27 responses received from law enforcement agencies (LEAs), industry bodies, government departments, and charitable organisations
- undertook familiarisation visits to Border Force intelligence locations in Hull, Immingham,
   Dover, and Folkestone between 28 June and 1 July 2022
- undertook familiarisation calls with LEAs, freight industry bodies and a charitable organisation in July 2022
- analysed the documentary evidence and data provided by the Home Office in response
  to inspectors' preliminary, formal, and further evidence requests, which were drafted in
  accordance with the ICIBI's 'expectations' of asylum, immigration, nationality, and customs
  functions (Annex C)
- interviewed and held focus groups (via Microsoft Teams and in person) with Home Office managers and staff from grades Executive Officer to Senior Civil Servant between 5 and 23 September 2022
- undertook visits and observations in Border Force intelligence locations in Croydon, Hull, Immingham, Dover, and Folkestone
- interviewed and held focus groups (via Microsoft Teams and in person) with LEA and freight industry representatives
- presented the emerging findings to Home Office senior management on 5 October 2022

# Inspection findings: business transformation

- 6.1 This chapter considers the impact of the Border Force Intelligence Directorate (BFID) PIONEER transformation programme restructure on intelligence flows and core functions, and the effect of further transformation under the MINERVA programme. Further details of both PIONEER and MINERVA are available in chapter 3.
- 6.2 In looking at these transformation programmes, inspectors considered whether BFID aligned with the ICIBI expectations that "background and explanatory documents are easy to understand and use" and "processes are simple to follow and transparent".

### PIONEER Phase 1

- Phase 1 of PIONEER began in late 2020 and delivered the resource and infrastructure changes required to achieve the target operating model structure. Regional intelligence units were restructured in the third quarter of 2021. Modal hubs were created, composed of dedicated intelligence development officers and targeters, with analysis support. [Redacted]. These intelligence functions are explained in chapter 3.
- **6.4** During this inspection, the teams described in figure 6 below were of particular interest.

### Figure 6: Modal hubs, multi-agency hubs and [redacted]

### **Modal hubs**

The Accompanied RoRo Modal Hub (ARM) was based in Dover and had responsibility for accompanied RoRo freight (such as lorries) and tourist traffic in the Southeast. The ARM worked closely with the Unaccompanied RoRo Modal Hub (UMH).

The UMH had responsibility for unaccompanied RoRo freight, although it also carried out some work on tourist traffic in northern and central areas. The team was split geographically between Hull and Immingham. Developers and targeters worked closely together, with two developers in Hull, two in Immingham, and one working remotely.

An analyst supported the modal hub, but they were not co-located with the team. A senior manager told inspectors that it would be better if the analyst was located with the team as then they would learn from the UMH staff, and that the current arrangement was not working.

Targeters and developers in the UMH identified unaccompanied RoRo freight targets for frontline staff to action. [Redacted].

[Redacted].

### **Multi-agency hubs**

The Gateway Multi-Agency Hub (Gateway MAH) based in Folkestone and the Forward Intelligence Cell (FIC) based in Hull were Border Force-led multi-agency hubs which shared the same leadership, processes, and database. They were a collaboration of agencies including HO Intelligence – Border Force and Immigration Enforcement Intelligence, National Crime Agency (NCA), HM Revenue & Customs (HMRC), Humberside Police, Kent Police, Essex Police, Department for Work & Pensions (DWP), Counter Terrorism Border Police, and Driver & Vehicle Standards Agency (DVSA). Their goal was to identify, disrupt, deter, and dismantle cross-border criminality across high-harm threats taking place via RoRo freight (accompanied and unaccompanied). These included clandestine entrants to the UK, class A drugs, cash, firearms, counter-terrorism, and national security. The Gateway MAH also looked at illegal migration via small-boat traffic along the eastern, south-eastern, and southern coastline, and juxtaposed controls.<sup>35</sup> The FIC was an extension of the Gateway MAH and was set up to provide a "northern footprint".

Collection teams		
[Redacted].		
[Redacted].		
[Redacted].		

### **PIONEER Phase 2**

- 6.5 PIONEER Phase 2 began in the third quarter of 2021. It focused on identifying and embedding the changes required to realise the objectives of the target operating model through delivery of the following workstreams:
  - standard operating procedures (SOPs)
  - capability strategies
  - tasking and co-ordination process
  - standing-up capabilities to minimum viable product and 'model modal ways of working'.
- Border Force provided evidence to inspectors that Phase 2 workstreams had been implemented and were bedding in. A senior manager told inspectors that, under PIONEER, they ensured that every intelligence team had SOPs. Inspectors had sight of SOPs and guidance, which were published on SharePoint (the Home Office central corporate repository) and were accessible to Border Force staff. Managers told inspectors that SOPs and guidance were regularly updated. The Home Office provided inspectors with copies of the strategies for the development, targeting, collection, and analysis functions. Modal hubs were operating with developers, targeters, and analytical support, and were configured according to their mode and threat focus. Tasking and co-ordination groups (TCGs) were operating at a local and national level.

<sup>35</sup> The UK operates border controls in France and Belgium. This allows Border Force officers to check passengers and freight destined for the UK before they begin their journey. These 'juxtaposed controls' are in place at Calais and Dunkirk ports, at the Eurotunnel terminal at Coquelles and in Paris Gare du Nord, Lille, Calais-Frethun and Brussels Midi stations for Eurostar passengers. The arrangement is reciprocal, with French officers completing Schengen entry checks in the UK. These arrangements are underpinned by bilateral treaties. Home Office, 'Fact sheet: The UK's juxtaposed border controls', (published 11 July 2017), <a href="https://homeofficemedia.blog.gov.uk/2017/07/11/fact-sheet-the-uks-juxtaposed-border-controls/">https://homeofficemedia.blog.gov.uk/2017/07/11/fact-sheet-the-uks-juxtaposed-border-controls/</a>

- **6.7** Border Force identified several high-level benefits from PIONEER:
  - "Improved strategic approach to threat
  - Better command co-ordination and resourcing to risk
  - Improved impact on high-harm threats
  - Improved collaboration and credibility with partners
  - Improved workflow and performance
  - Better-quality targets and intelligence products
  - A professionally developed workforce, which can flex across threat and mode
  - Reduced nugatory effort"

### Strategic approach to risk and threat

- Inspectors found that, in general, managers and senior managers were positive about the PIONEER restructure. A senior operational manager told inspectors that PIONEER helped Border Force to focus on specific risks and threats "to make sure we are facing in the right direction".
- 6.9 The analysis function benefitted from the change from regional to modal hubs as it facilitated easier gathering of data with which to inform threat assessments and control strategies.

  Managers in Intelligence Analysis & Assessment (IA&A) told inspectors that the PIONEER structure was an improvement as it allowed them to concentrate on a specific mode rather than analysing all modes in a particular area. They said that they looked at the threats relevant to the modes they were working on, which provided better focus than their previous way of working.
- 6.10 During a focus group, analysts told inspectors that the PIONEER structure was useful for senior grades to plan resources and that the relationship with the Gateway MAH had improved due to closer working. However, an analyst said that although they had tried to work alongside a different MAH, they were quite separate and that, "It's difficult to get them to use me." They said that the analysis function was still quite new and that they sometimes found it difficult to explain how an analyst could assist.

### Intelligence flows between intelligence teams

- 6.11 Border Force staff told inspectors that there had been positive and negative impacts on intelligence flows under PIONEER. A UMH manager said that previously, intelligence staff working on a national remit in a specific mode did not engage with the regional intelligence unit, even though they were working in the same building, and that "PIONEER was exactly what we needed".
- 6.12 Some intelligence managers and senior managers considered PIONEER to have been a positive change due to improved intelligence flows between targeters and developers in modal hubs. It enabled them to sit physically together and work more closely, which had improved the relationship "significantly". A Border Force National Intelligence Hub (BFNIH) manager told inspectors that BFID was "more joined up working under the modal structure" than the previous regional structure. A senior manager told inspectors that "PIONEER has worked really well for us".

- 6.13 Although PIONEER improved intelligence flows between developers and targeters in modal hubs, inspectors were told that PIONEER hindered intelligence flows elsewhere. A [redacted] manager commented that, "There are still some silos. Modal hubs don't task collection teams and they need to work on what each team does and how they interlock."<sup>36</sup>
- 6.14 Modal hub officers told inspectors that they thought they should be doing collection work themselves. They said that it took longer to task collection, as they had to explain the problem to collection officers first and then keep asking them to ask further questions. A modal hub manager told inspectors that collection was tasked by the modal hub, although not "a huge amount" around [redacted] a year.
- 6.15 The field intelligence officer (FIO) role was previously part of an intelligence officer's job under the regional structure. FIOs engage with and gather intelligence [redacted].
- **6.16** [Redacted].<sup>37</sup>

### Intelligence sharing between intelligence teams and frontline staff

- 6.17 Collection officers told inspectors that previously, FIOs were a local point of contact for frontline staff. They would go out with frontline staff on operational deployments and would conduct intelligence checks for them. Under PIONEER, this engagement had been lost. However, a senior intelligence manager said that this "was never a perfect way of working", and that there was "no proper audit trail".
- 6.18 PIONEER and the introduction of the Central Operations Platform (COP) enabled staff to submit referrals to BFNIH or a modal hub through a formal process. Some ARM managers said this had given frontline staff the "opportunity to feed into intel cycles" and that ARM was "now getting more frontline interaction". However, an operational manager said that frontline staff did not like using COP as it was "clunky and slow". [Redacted].
- 6.19 Developers in a focus group described PIONEER as a "broken model". A manager in the modal hub said that frontline officers had previously come to them with information relating to the local region, "[redacted]". Since the PIONEER restructure they had to direct frontline staff who approached them to intelligence officers in other parts of the country, and they questioned whether frontline officers would be motivated to do this.<sup>38</sup>

### **Collaboration with partners**

6.20 The Border Force restructure to a modal design did not align with police forces, which are set up on a geographical basis. Senior police officers in the Yorkshire and Humber Regional Organised Crime Unit (YHROCU) told inspectors that it had an intelligence cell with staff embedded from NCA and HMRC – and previously from Border Force – but the Border Force officer had left and had not been replaced. Inspectors noted that the PIONEER restructure had left law enforcement agencies (LEAs) without an obvious local BFID point of contact. An intelligence manager in the FIC told inspectors that they had questioned who would attend

<sup>36</sup> The Home Office, in its factual accuracy response of January 2023, stated: "The inter-operability and unified working opportunities were not articulated clearly enough. Hubs do attend Ops TCG and Collection are the main recipients of the taskings. Specialist Intelligence was not typically seen as a Collection capability."

<sup>37 [</sup>Redacted].

<sup>38</sup> The Home Office, in its factual accuracy response, stated that the FIC officers undertook a series of presentations to the Humber Specialist Freight Group (SFG) to encourage more frontline intelligence submissions.

- meetings with LEAs under the PIONEER structure, but they "didn't hear anything back about it" so kept attending the meetings they had gone to in their previous role.<sup>39</sup>
- 6.21 According to the 'Development Strategy', a key role of the development officer is inter-agency working and stakeholder engagement. Development can also task Collection to undertake engagement. An intelligence manager told inspectors that "nobody is going to see shippers and importers or doing trader visits", attributing this to the separation of the collection and development roles under the PIONEER programme. They added that there was room for a business engagement role.
- 6.22 Senior managers told inspectors that PIONEER was meant to be a three-year project but was closed in March 2022, 12 to 18 months earlier than planned. This was due to the launch of the One Home Office (OHO) transformation programme and the creation of Home Office Intelligence by merging Border Force and Immigration Intelligence under the MINERVA programme (as described in chapter 3).
- 6.23 A senior intelligence manager explained that there was a gap in managing LEA and partner relationships in the Humber region because PIONEER closed earlier than expected, and it was something that would be reviewed.

### **MINERVA**

- **6.24** PIONEER delivered large-scale transformation in BFID and set the foundations for the MINERVA programme.
- Border Force conducted a 'PIONEER Lessons Learned Review', which was completed in April 2022. Inspectors considered that this demonstrated effective practice and a willingness to learn and improve, and they looked at the key lessons learned in relation to the progress being made on MINERVA.
- The 'Home Office Intelligence Risk Register' dated April 2022, and MINERVA risk report of June 2022, highlighted several risks which should have been addressed before the start of a new transformation programme, according to the PIONEER Lessons Learned Review. They included the requirement for a clear vision of the objectives, benefits, end state of the transformation, and the resources required for delivery. Despite this, there were outstanding actions to confirm the practical elements of Home Office Intelligence transformation and the resulting communication plan to be approved.
- 6.27 A senior intelligence manager told inspectors that the PIONEER Lessons Learned Review had been very useful in directing some of the activity of the MINERVA team. They considered some of the important learning points to be communication, consistency of messaging, clear language, and involving key senior managers to ensure they understood the rationale for change.
- Work had already begun on merging several capabilities such as Border Force and Immigration Enforcement [redacted], and analytical functions. Managers [redacted] were positive, saying, "This is working well. We have a weekly call to talk through issues and trends. There are lots of cross overs with our jobs." Analysts said that joint working with Immigration Enforcement analysts was "working better than we thought it would".

<sup>39</sup> The Home Office, in its factual accuracy response, stated that: "An email agreeing geographical engagement responsibilities was sent on 10/12/21 following extensive consultation. Modal teams agreed to adopt the strategic lead for geographical partnerships."

- 6.29 The merger is expected to last a further two to three years before reaching completion.

  A senior manager in Border Force told inspectors that they understood the strategic vision of MINERVA but were unsure what it would look like and how it would work, "Too many seniors talked about PIONEER at a strategic level, talking through processes without conversations with staff, and we can't make the same mistakes with MINERVA."
- 6.30 A senior manager told inspectors that having a dedicated communications team was discussed at the beginning of the MINERVA programme, but one had not been established. The MINERVA transformation team delivered mini roadshows, 'lunch and learn' sessions, and regularly updated a MINERVA SharePoint page to which staff were signposted. They also held working groups and all staff dial-ins with senior managers. Inspectors were told by staff in Hull and Immingham that roadshows were imminent.
- 6.31 Intelligence officers told inspectors that although there had been lunch and learn sessions and they had received emails about MINERVA, they were not always able to attend sessions or given time to read and digest information sent by email. There was also a lack of opportunity to feed into the changes. They said, "We get talked at, telling us what's going to happen, there's not really any input from our side." An intelligence officer in another team described "change overload".

### **Change fatigue**

- 6.32 Staff at all grades told inspectors about 'change fatigue'. Over the last two to three years, Border Force staff had experienced changes due to the UK's departure from the EU, the COVID-19 pandemic, the PIONEER transformation programme, the introduction of new IT systems, and the MINERVA transformation programme in quick succession. Several managers considered that this could affect the mental health and wellbeing of staff. A senior manager said, "I've never known so much change and can't see it ever coming to an end" and "change is one of the biggest challenges". Another was concerned about "change and stress" on their teams. A manager in a multi-agency hub said that it was a "very stressful time".
- 6.33 A senior manager in the MINERVA transformation team acknowledged that change fatigue was an issue and told inspectors that they were very mindful of it. They said they had made a conscious decision to avoid too many communications about MINERVA. They also highlighted that staff were signposted to information about mental health first aiders and other health and wellbeing information on the MINERVA SharePoint page in their communications.

### **Conclusions**

**6.34** Findings on what is working well in business transformation and what requires attention are summarised in figure 7 below.

**Figure 7: Conclusions – business transformation** 

Working well	Requires attention
The PIONEER restructure has taken place	<ul> <li>The PIONEER programme has not been fully delivered</li> </ul>
There is closer working between targeters and developers	<ul> <li>PIONEER has had a negative impact on engagement between developers and frontline staff at the Humber ports</li> </ul>

Working well	Requires attention	
Siloed working has been reduced in each mode	<ul> <li>New siloes have been created between modes at the Humber ports</li> </ul>	
<ul> <li>PIONEER Lessons Learned Review demonstrated effective practice</li> </ul>	The collection remit is unclear to staff	
	<ul> <li>The MINERVA target operating model end state remains unclear to staff</li> </ul>	
	<ul> <li>There is change fatigue, resulting in lack of interest in further transformation</li> </ul>	

### **Conclusions**

Structures are in place and there are benefits to be seen in the formation of modal hubs with a national remit, particularly in enabling easier analysis of modes and threats, and facilitating the creation and updating of strategic threat assessments.

Siloes have been removed in modes, and targeters and developers are working closely together, but new siloes have been created between intelligence functions and frontline staff, and between modes at the Humber ports.

Standard operating procedures and guidance are in place in all intelligence teams, in line with the ICIBI expectation that background and explanatory documents are easy to understand and use.

Clarity is needed on the remit of collection officers to maximise tasking opportunities and ensure engagement gaps are filled.

The Border Force modal structure does not align with the regional structures of many other LEAs and Regional Organised Crime Units, leading to confusion about who to contact in Border Force. There is a need for a dedicated lead to have oversight of intelligence across all the modes and threats in each area.

PIONEER is operating as a minimum viable product and is still being embedded in some areas. Clarity is needed for staff on roles, remits, and processes.

The PIONEER Lessons Learned Review was an example of effective practice and identified areas where improvements could have been made; these insights should be utilised in progressing MINERVA.

Border Force staff at all grades were unsure of the end state of MINERVA. The MINERVA team has worked on a range of communication methods to keep staff appraised of plans and updates, but this does not appear to have had the desired impact.

Managers should note levels of 'change fatigue', and the potential impact on staff health and wellbeing. Future changes need to be made gradually, engaging with staff across intelligence functions at all levels.

## 7. Inspection findings: National Intelligence Model and the intelligence cycle

7.1 Inspectors examined whether Border Force Intelligence Directorate (BFID) processes aligned with the 'National Intelligence Model' (NIM) and the intelligence cycle.<sup>40</sup> They also considered whether the processes were consistent with the ICIBI expectations that "background and explanatory documents are easy to understand and use" and "processes are simple to follow and transparent".

## **The National Intelligence Model**

- 7.2 The National Intelligence Model is a business model for law enforcement and takes an intelligence-led approach to policing. It became the policy of the Association of Chief Police Officers (ACPO) in 2000. The government acknowledged its benefits, and all police forces in England and Wales were required to implement the NIM to national minimum standards from April 2004. It has also been adopted by other law enforcement agencies (LEAs), and Border Force is committed to adhering to it.
- 7.3 Border Force often refers to itself as being 'intelligence-led' when referring to the way in which it determines its priorities and decides where and how to deploy its resources. What constitutes intelligence, and how it is gathered and used, differs from sector to sector. However, at its simplest, being intelligence-led requires trained staff and functioning processes and systems to collect relevant information, evaluate it, and ensure that it reaches those who need to know it, and act upon it, in a usable form and in good time.
- 7.4 The NIM improves the opportunities to share intelligence across LEAs. It reduces barriers to effectiveness by producing standardised processes and language. For example, standardised intelligence reports have set evaluation and handling codes. This allows any LEA officer to understand the reliability of the intelligence, who it can be shared with, and what actions they can take in relation to the intelligence.
- 7.5 As discussed further in chapter 8, the NIM enables decisions to be made about priorities and tactical options through a series of tasking and co-ordination group meetings.
- As Border Force aspires to be an intelligence-led organisation, this inspection sought to understand how compliant it was with the NIM. A senior intelligence manager stated that as Border Force was not fully an LEA, it was difficult to say that they were fully NIM-compliant, but that they applied the NIM principles "as far as we can in a Civil Service environment". A senior operational manager echoed this comment, "Formal NIM structures are pretty tight and good" and "being a law enforcement body inside the Home Office is challenging compared to being a separate law enforcement body." Other senior intelligence managers told inspectors that their business areas were NIM-compliant.

7.7 Under the NIM, intelligence functions can be considered in relation to the 'intelligence cycle', as explained below.

## The intelligence cycle

- 7.8 The Home Office defines intelligence as 'assessed information'. Information becomes intelligence when it is assessed or evaluated by an intelligence officer who conducts research and background checks. The intelligence can then be used to create products, both strategic and tactical. The process through which intelligence is received or collected, analysed, processed, and disseminated is best understood as a cycle. Feedback resulting from intelligence tasking and products helps to create the requirements for the next cycle.
- 7.9 Border Force Intelligence Directorate sets out the intelligence cycle, as depicted in figure 8 below. All of Border Force's intelligence capabilities (collection, development, targeting, and analysis) have a role to play in the cycle. While some capabilities may have greater involvement in certain elements, all will have an input into the cycle.

Re-evaluate

Task and coordinate

Collect

Analyse

Evaluate and process

Figure 8: Intelligence cycle depicted by Border Force Intelligence Directorate

- 7.10 In simple terms, the intelligence cycle has seven key elements which include the collection, development, dissemination, and re-evaluation of intelligence. Inspectors observed that BFID had allocated dedicated resource to each of these key elements. However, the need for improvements to processes, particularly in the collection of intelligence, was identified.
- **7.11** The key stages of the intelligence cycle are described below.

#### Intelligence cycle: Task and co-ordinate

**7.12** Border Force's tasking and co-ordination process is outlined in chapter 8 and sets the strategic priorities, and produces threat assessments, which include intelligence requirements or

intelligence gaps. Those intelligence gaps should then be communicated to, and understood by, Border Force's workforce and partners in the form of a strategy for the collection of intelligence.

#### **Intelligence cycle: Collect**

- 7.13 To reduce the number of gaps and create a more complete intelligence picture against each threat area, Border Force must have an effective collection capability that can collect information and intelligence from a variety of sources. These include BFID and frontline staff, other government departments, law enforcement partners, industry stakeholders, and the public.
- 7.14 Collection officers are deployed across the UK to collect and gather intelligence. Intelligence staff told inspectors that although the collection capability was busy nationally, it was underutilised in certain areas. Inspectors found that collection officers in Hull had not received intelligence training and lacked basic knowledge of Border Force. This did not comply with core NIM principles that staff should be well trained and professional. This area is examined in more detail later in this report.

#### [Redacted]

- **7.15** [Redacted].
- **7.16** [Redacted].

#### **Frontline**

- 7.17 As discussed in chapter 6, inspectors observed that the number of intelligence submissions by Border Force frontline staff had reduced because of structural organisational change and the introduction of new IT systems. The Central Operations Platform (COP) was time consuming for frontline staff to complete, and intelligence staff told inspectors that it was a difficult and lengthy process to extract the necessary information from it. An experienced frontline officer told inspectors that they had not submitted an intelligence report in the previous year and had lost access to the Single Intelligence Platform (SIP) because they had not used it for so long.<sup>41</sup>
- 7.18 In early 2022, an intelligence manager was so concerned about the low number of intelligence submissions in the Humber ports that they raised the issue at the Operational Intelligence Tasking meeting. They said that "only four referrals were submitted [in the Humber region] during January 2022, three of those from one officer". There was a proposal that the collection capability should roll out a programme of presentations to all frontline officers in the Humber command, specifically in the maritime RoRo environments. However, this tasking was declined as it was not a collection function, and it is unclear whether any further action was taken. 42
- 7.19 Communication with frontline staff is vital to ensure that opportunities to obtain intelligence from frontline interactions with the public and stakeholders are maximised. Feedback on intelligence disseminated to frontline staff is also crucial to ensure that disseminated

<sup>41</sup> Single Intelligence Platform (SIP) is the intelligence system used by staff in the borders, immigration, and citizenship system to create, disseminate, and store intelligence reports.

<sup>42</sup> The Home Office, in its factual accuracy response, stated: "Separately, FIC [Forward Intelligence Cell] officers then undertook a series of presentations to the Humber Specialist Freight Group (SFG) to encourage more frontline Intelligence submissions. Border Force Senior Officials noted that the low number of referrals was an inaccurate representation by the manager."

intelligence is re-evaluated and the intelligence cycle is completed. Engagement between the intelligence functions and frontline staff is discussed further in chapter 9.

## **Intelligence functions**

- **7.20** As discussed in chapter 6, intelligence flows between some intelligence functions had improved because of the PIONEER restructure, particularly between developers and targeters.
- 7.21 However, there was a lack of engagement and tasking between the intelligence teams to whom inspectors spoke. This was partly due to confusion over the remit of the collection capability and the time taken to receive a result. As discussed further in chapter 8, the vast majority of taskings were directed towards the collection capability and very few to the modal hubs or other intelligence teams.

#### **Stakeholders**

- 7.22 The PIONEER restructure from regional intelligence units to modal hubs meant that there was not a natural local intelligence contact point for LEAs and industry partners. Inspectors noted the absence of a single, consistent point of contact for industry partners in the Humber ports. Without this, Border Force risks losing a key intelligence source.
- 7.23 A senior intelligence manager told inspectors that due to the PIONEER programme closing early there was a gap in LEA and partner relationships in the Humber region, and they acknowledged that this needed to be reviewed.
- **7.24** Border Force urgently needs to review its relationship with LEAs and industry stakeholders, and establish clear pathways to share intelligence that are simple to follow and easily understood by partners.

## **Project KRAKEN**

- 7.25 One way in which the public can provide information to Border Force about suspicious or unusual activity in coastal waters or at the coast is through Project KRAKEN. Established in 2008, KRAKEN is a joint initiative between the National Crime Agency (NCA), the police, and Border Force.
- 7.26 In October 2021, the ICIBI conducted an inspection into the effectiveness of Border Force's role in Project KRAKEN at small seaports, making one recommendation:

"As part of the Project Kraken relaunch, due in spring 2022, critically evaluate, and where necessary, implement:

- a. the resources required (including staffing, strategic communications, and promotional materials)
- b. any new intelligence reporting mechanisms, including changes to improve their efficiency and effectiveness where appropriate
- c. mechanisms to continuously measure the effectiveness of the Project."43
- 7.27 The effectiveness of Border Force's role in Project KRAKEN, or any changes that Border Force may have made because of the October 2021 inspection, were not assessed as part of this

<sup>43</sup> ICIBI, 'An inspection into the effectiveness of Border Force's role in Project KRAKEN at small seaports', (published 27 January 2022), <a href="https://www.gov.uk/government/publications/an-inspection-into-the-effectiveness-of-border-forces-role-in-project-KRAKEN-at-small-seaports">https://www.gov.uk/government/publications/an-inspection-into-the-effectiveness-of-border-forces-role-in-project-KRAKEN-at-small-seaports</a>

- inspection. However, inspectors did observe collection officers based in Hull distributing Project KRAKEN promotional material during a visit to a local harbour master.
- 7.28 Information can be provided by the public by calling the police on 101, by reporting online at GOV.UK, or by making an anonymous phone call to the Crimestoppers charity. Border Force receives anonymised information from Crimestoppers, who send the information directly to the Border Force National Intelligence Hub (BFNIH). A Crimestoppers manager told inspectors that the relationship with Border Force was positive and working well at a national level.

#### **Intelligence cycle: Evaluate and process**

- 7.29 Multi-agency hubs (MAHs) and modal hubs both develop intelligence and produce packages that support the targeting function.<sup>44</sup> [Redacted].<sup>45</sup>
- 7.30 Inspectors observed that development packages were translated into targeting packages and issued to frontline staff for actioning. Some intelligence packages identified potential criminal activity that could not be actioned by Border Force and needed to be passed onto other LEAs. [Redacted].
- **7.31** Border Force does not have its own prosecution capability. [Redacted].<sup>46</sup>

#### Intelligence cycle: Analyse and produce

- 7.32 As discussed in chapter 6, analysts considered PIONEER to have been beneficial in improving the ability to analyse risks and threats across modes. Inspectors were told that analysts were well trained (see chapter 11), and they saw evidence of good quality strategic analytical products. [Redacted].
- **7.33** Greater volumes of intelligence from BFID, frontline, and external sources will enable the production of more detailed and accurate products which will, in turn, improve the effectiveness of the intelligence cycle.
- 7.34 Intelligence staff told inspectors that intelligence is also shared directly with individual hubs and that, on occasion, several hubs will be sent the same intelligence report. Staff and managers highlighted that although each hub may have a business need to be aware of a specific piece of intelligence, it was not always clear who was responsible for its management and assessment. Staff and managers in the Gateway Multi-Agency Hub (MAH) told inspectors that they regularly received intelligence reports that had been distributed to various hubs and departments, and that they had to telephone the other recipients to understand who had ownership of the reports.
- 7.35 A Gateway MAH officer told inspectors, "Deconfliction is a massive problem. It takes time. When people are not on duty [we] can't take action as someone else may be dealing. It's always been an issue." A senior manager also described deconfliction as a "nightmare".
- 7.36 Inspectors considered that BFID managers should revisit the process for allocation and ownership of intelligence, and provide a clear and easy to understand process for all staff and external partners to follow.

<sup>44 [</sup>Redacted].

<sup>45 [</sup>Redacted].

<sup>46 [</sup>Redacted].

- 7.37 Embedded staff from other LEAs working in a MAH told inspectors that they thought Border Force staff were overly cautious in their use of restricted handling conditions on intelligence reports. They said that this could be the result of a lack of training, resulting in a lack of confidence in the use of handling codes. A senior intelligence manager in another team also told inspectors that Border Force staff tended to use more restricted handling conditions than they were used to. Another manager said that the use of more restrictive handling conditions could be due to training and interpretation, but they explained that Border Force did not always own the intelligence. Sometimes their intelligence came from a third party, and they had no option but to impose restrictions on what could be done with it.
- **7.38** Managers in a MAH told inspectors that internal policy restricted the sharing of intelligence with agency staff.<sup>47</sup> [Redacted].
- **7.39** Inspectors concluded that Border Force should review its policy relating to the sharing of intelligence with agency staff.

#### Intelligence cycle: Re-evaluate

- 7.40 The intelligence cycle requires that intelligence products are re-evaluated to incorporate feedback, new information or intelligence. Inspectors observed that analysts reviewed and refreshed products when preparing monthly and quarterly threat assessments, ensuring that they remained relevant.
- 7.41 A frontline manager in the Humber ports told inspectors that they did not have the resources to complete feedback on every target issued to them because the process was time consuming. They said that they entered all the positive results of targets onto COP but not all the negative outcomes. Another frontline officer told inspectors that they could not recall the last time they had submitted an intelligence report or provided feedback.
- 7.42 Inspectors concluded that BFID must be provided with feedback and updated intelligence obtained through frontline interactions to evaluate their intelligence products and target packages. Without this feedback the intelligence cycle is broken.
- **7.43** Figure 9 below highlights the areas of BFID in which the intelligence cycle is working well and areas that require attention.

Figure 9: Conclusions – National Intelligence Model and the intelligence cycle

Working well	Requires attention
The intelligence flows within modal hubs have increased	<ul> <li>Intelligence submissions and feedback from frontline staff are low and require attention</li> </ul>
• [Redacted]	• [Redacted]
	<ul> <li>Intelligence staff may lack training and confidence when creating intelligence reports</li> </ul>
	The collection team needs more training

Working well	Requires attention
	<ul> <li>There is a lack of engagement with LEAs and industry stakeholders</li> </ul>
	<ul> <li>The process for providing intelligence packages to other LEAs is not effective</li> </ul>
	<ul> <li>The sharing of intelligence with agency staff needs to be improved</li> </ul>

#### **Conclusions**

Frontline staff need support, encouragement, and management oversight to ensure intelligence is submitted in a timely and effective manner.

Intelligence flows within the intelligence modes have improved following organisational restructure. However, further process changes are needed to improve communication between intelligence teams and establish 'ownership' of intelligence, thereby preventing duplication of effort.

Intelligence packages were not always adopted by other LEAs, and a more effective process for external tasking and sharing of intelligence packages should be identified.

Border Force should review its policy on the sharing of intelligence with agency staff.

# 8. Inspection findings: the Border Force intelligence tasking and co-ordination process

8.1 Inspectors examined whether the tasking process aligned with the ICIBI expectations that "background and explanatory documents are easy to understand and use" and "processes are simple to follow and transparent".

## Tasking and co-ordination overview

- 8.2 It is the intention of Border Force to embrace the National Intelligence Model (NIM) to be more 'intelligence-led'. The aim of this is to provide focus to operational activity and achieve a disproportionately greater impact from the resources applied to any problem.
- **8.3** The NIM strategic and tactical tasking meeting structure in Border Force is as follows:
  - Strategic Tasking and Co-ordination Group (STCG)
  - Tactical Tasking and Co-ordination Group (TTCG)
  - Intelligence Tasking and Co-ordination Group (ITCG)
  - Operational Intelligence Tasking and Co-ordination Group (Ops ITCG)
  - Modal hub/collection team and Multi-Agency Hub Tasking and Co-ordination Groups
- 8.4 At the heart of the model are the Strategic Tasking and Tactical Tasking and Co-ordination Group meetings. The purpose of the Strategic Tasking and Co-ordination Group (STCG) meeting is to agree a control strategy which establishes the intelligence requirement and sets the agenda for intelligence, prevention, and enforcement priorities. The purpose of the Tactical Tasking and Co-ordination Group (TTCG) meeting is to apply a planned response to the control strategy.
- **8.5** Figure 10 below shows the Border Force intelligence tasking and co-ordination process.

Governance: BFID Tasking and Coordination Process

Tasking and direction setting

Tasking and

Figure 10: Border Force intelligence tasking and co-ordination process

## **Border Force Control Strategy 2022**

- **8.6** The 'Border Force Control Strategy 2022' (BFCS) pulls together the corporate understanding of the threats that are informed by Border Force and external partners.
- 8.7 The BFCS states, "Border Force's mission is driven by objectives from the Home Office, Outcome Delivery Plans, and the vision towards having the world's most effective border by 2025. The aim of the BFCS is to identify the priority level for each thematic area of responsibility."
- 8.8 The BFCS is a living document and is refreshed regularly using collation and analysis of further intelligence and assessment of other operational factors received during each reporting period. It supports senior managers in identifying the priorities for Border Force in securing the border and protecting the public against terrorism, crime, revenue fraud, and immigration abuse.
- 8.9 The threat assessments and control strategy priority ratings are collated by the analysis function and used by the STCG, which is chaired by the Border Force Chief Operating Officer. The STCG discusses and agrees the priority ratings with Border Force business leads and external partners.
- **8.10** The control strategy priority ratings are shown in figure 11 below.

#### Figure 11: [Redacted]

[Redacted].

## **Border Force strategic threat assessments**

**8.11** Strategic analysts produce monthly, quarterly, and annual threat assessments and work closely with key partners to collate meaningful products. [Redacted]. One analyst told inspectors:

- "We all go to lots of meetings with lots of other partners, and seniors have done work to enable that."
- 8.12 The threat assessments are used to produce an intelligence product that identifies intelligence gaps. These packages are presented at the ITCG for actioning to frontline staff and are also shared with Border Force colleagues and partners. Intelligence products are presented to the TTCG and STCG meetings to support decision making.
- 8.13 The Border Force 'Annual Strategic Threat Assessment' (STA) for 2022 was assessed by inspectors as a detailed and well-presented document that collated available intelligence and a set of future scenarios. The STA is used by the STCG to better understand the threats at the border and to formulate the control strategy and priority ratings.
- 8.14 The 'Quarterly Threat Assessment' is a three-monthly update to the STA. The assessment provides the STCG with updates on new trends and existing threats. Inspectors noted that the documents were well structured and presented in a clear and easy to understand format.
- 8.15 Inspectors also reviewed the minutes of the ITCG meetings where the 'Monthly Threat Assessments' were discussed. The ITCG had the opportunity to review the contents, provide and develop operational responses to new intelligence requirements, and refer wider resourcing requirements to the TTCG for support and direction.
- 8.16 Strategic analysts had established good working relationships with other analytical functions across law enforcement agencies (LEAs) and with external partners in the preparation and evaluation of threat assessments. Analytical products were peer reviewed by partner agencies, and inspectors considered this to be good practice.
- 8.17 In establishing the BFCS, Border Force intelligence analysts and external partners score each thematic area using the 'Management of Risk in Law Enforcement' (MoRiLE) 2020 framework. MoRiLE is a structured methodology to support prioritisation, providing a consistent approach to identifying tactical and strategic priorities across LEAs. Its methodology assesses the impact and likelihood of any given threat type against the capacity and capability to address the threat. The proposed scores are then presented to Border Force operational and intelligence leads for consideration. They are then reviewed by the STCG, which overlays other factors, such as political imperatives and wider national priority considerations, before the final priority ratings are approved.

## **Strategic Tasking and Co-ordination Group**

## **Border Force Intelligence Directorate's role in the Strategic Tasking and Co-ordination Group**

8.18 It is the responsibility of Border Force Intelligence Directorate to support the Strategic Tasking and Co-ordination Group (STCG) through the provision of strategic assessments, to prepare the control strategy for agreement, and to communicate and agree the key intelligence requirements. These documents are used to inform the strategic prioritisation of resources in Border Force and its engagement with partners.

#### **Terms of reference**

- **8.19** The terms of reference for the STCG are defined as:
  - "Provide the national strategic decision-making forum to drive border activity which is based on intelligence, threat, and vulnerability so as to address high-threat high-harm goods and people crossing the border
  - Consider and approve the Border Force annual threat assessment
  - Consider and approve the Border Force national strategic intelligence requirements
  - Consider and agree the priorities as presented in the annual Border Force Control Strategy for presentation to the Border Force Board for sign-off
  - Consider, agree and, when necessary, reset border priorities on a quarterly, forward-look basis, taking into account Border Force Control Strategy priorities, Border Force Strategic Directives, and the requirements of cross-government strategies – particularly the Border Force Strategy – remits, mandates, and international commitments which impact on the border
  - Remit any taskings or proposals to the Border Force National Tactical Tasking and Co-ordination Group (TTCG) for operational development, planning, and management of the activity
  - Review and adapt the function of the group as cross-agency governance structures evolve or change."
- **8.20** The STCG is owned and chaired by the Border Force Chief Operating Officer. STCG meetings are held quarterly and consist of two sessions, one for Border Force staff only and one for external partners.
- 8.21 The session for Border Force staff has representatives from National Operational Headquarters

   Operational Tasking and Co-ordination, Regional Directors, Intelligence Analysis, Strategy
  Capability and Planning, Performance Reporting and Analysis Unit, Operational Assurance
  Directorate, and Operational Logistics.
- **8.22** The external partners' session is scheduled to follow the Border Force session (on the same day) and consists of representatives from:
  - "National Crime Agency (NCA)
  - HM Revenue & Customs (HMRC)
  - Counter Terrorism Borders Operations Centre (CTBOC)
  - Homeland Security
  - Border Security Strategy Unit, STARS
  - Immigration Enforcement (IE)
  - Clandestine Channel Threat Command (CCTC)
  - Department for Environment, Food & Rural Affairs (DEFRA)
  - Medicines and Healthcare products Regulatory Agency (MHRA)
  - Food Standards Agency (FSA)
  - Department for Transport (DfT)."

**8.23** The meetings provide the opportunity to present and discuss the strategic threat assessment and control strategy, as well as emerging issues and concerns raised by attendees.

#### **Assessment of the STCG process**

- **8.24** The Home Office provided inspectors with minutes from the STCG meetings and the terms of reference, strategic threat assessment, key intelligence requirements, and control strategy.
- 8.25 Inspectors interviewed senior Border Force managers and external partners who attended and supported the STCG. A senior manager in Border Force told inspectors that IE and Border Force had different STCG processes, and that IE was not represented at the Border Force STCG. They said, "we just want someone to attend ... we want an operational manager to appear at the meeting".
- 8.26 The Home Office subsequently told inspectors that the "Senior Director for Home Office Intelligence, which includes Immigration Intelligence, attends the Border Force STCG meetings". Inspectors concluded that attendance by an operational representative from IE should be considered, especially as the two organisations continue to merge their intelligence functions under the MINERVA programme.
- 8.27 Senior external partners told inspectors that the control strategy was shared with them in advance of the STCG meeting and that they had the opportunity to provide intelligence to support their specific area of business. They felt engaged with and encouraged to participate in the STCG process. One external partner told inspectors that the meeting was "very inclusive ... I feel I can pass on my opinion". Another said that "everyone gets the opportunity to speak".
- 8.28 Border Force considers the different priorities of partners when producing the control strategy but must balance competing priorities against its own requirements. This can cause tension, and two external partners told inspectors that the control strategy did not always reflect their organisation's requirements. One told inspectors, "I don't think [our priorities] are understood" and a second recounted a disagreement over a priority rating in the control strategy, saying, "we have not previously understood how Border Force do the risk assessments and how they account for the risks they manage on our behalf, and we're not able to influence that".
- **8.29** A senior Border Force manager was aware of the tensions and told inspectors, "It's up to our partners to give us the intelligence case to see if the MoRiLE score is where it should be. The onus is on them to ensure intelligence products are provided to let us make assessments on the control strategy."
- **8.30** Inspectors established that the differences of opinion were discussed at the STCG meeting and the final decision in the event of a disagreement was made by the meeting chair.
- 8.31 Inspectors noted that no STCG meetings were held between April 2021 and January 2022, and that the meetings held on those dates had different chairs. They were told that the chair of the meeting varied for operational reasons but were not provided with an explanation as to why no meetings took place between those dates. A senior partner said that "...with different chairs, we have different issues as they will have a different perspective".
- 8.32 Inspectors considered that as Border Force wants to be truly intelligence-led, the STCG meeting, and the consistency applied by the chair, are critical elements of that process. If a meeting does not take place, a record should be kept of the reasons why it was not held. Each chair should ensure consistency of approach at the meetings.

#### **Communicating the control strategy**

- 8.33 Staff at different grades and in different locations told inspectors that the 'control strategy' is communicated widely across Border Force and cascaded by managers in emails and during team calls. The control strategy is also available on the 'Intelligence Repository', on Horizon (the Home Office intranet).
- **8.34** Although some officers and managers told inspectors that they did not have time to read the strategy in full, the contents were widely understood and were used to prioritise workflows, as well as during the triaging of new intelligence.
- 8.35 Staff cited the control strategy as the source document that frequently informed decisions and the tasking of resources. The document offered a single picture of the threats at the UK border. Inspectors concluded that it had a direct influence on operational activity.
- **8.36** Figure 12 below provides a summary of where the STCG is working well and areas which require attention.

Figure 12: Conclusions – Strategic Tasking and Co-ordination Group

			<u> </u>
Working well		Re	quires attention
The STCG is external par	attended by a wide range of tners	•	The STCG needs consistency in the frequency and chairing of its meetings
The STCG hareference	s clearly defined terms of	•	There is a need for representation from Immigration Enforcement
	ncies felt engaged and to participate at the STCG		
and 'strategi	of the 'control strategy' c threat assessments' was artners as beneficial		
The control     Border Force	strategy clearly sets out e's priorities		
to, and unde	strategy was communicated erstood by, Border Force ternal partners		
Canalysians			

#### **Conclusions**

The STCG is widely attended by senior leaders from Border Force and external partner agencies.

The STCG shares intelligence products effectively, both internally and externally.

The control strategy is devised in collaboration with partners and sets out clearly the organisation's priorities. It is communicated to, and understood by, staff.

Partners feel engaged and able to contribute during the meeting.

The meeting is well structured and recorded, with clearly defined terms of reference.

## **Tactical Tasking and Co-ordination Group**

## Border Force Intelligence Directorate's role in the Tactical Tasking and Co-ordination Group

- 8.37 It is the responsibility of Border Force Intelligence Directorate to support the Tactical Tasking and Co-ordination Group (TTCG) through the provision of tactical assessments, to review and communicate changes in the intelligence requirement for approval, and to propose intelligence-led operations for frontline staff and partners. These objectives are clearly set out in the overarching terms of reference document provided to inspectors.
- **8.38** The TTCG should respond to the tactical threat assessment. It should use the tactical assessment and the control strategy to prioritise and focus intervention and intelligence activity. The group should also check that previously agreed plans and intervention work are still on course to meet objectives.
- **8.39** The TTCG should identify a tactical resolution plan and allocate a problem owner who will take responsibility for issues raised in the tactical assessment. This will ensure that the plan and problem owners are accountable to managers, and allow the TTCG to be informed of progress.
- **8.40** Border Force Intelligence Directorate will task other Border Force resources based on the current intelligence picture and will receive taskings for intelligence analysis, intelligence collection or intelligence development support from frontline and external partners.

#### **Terms of reference**

- **8.41** The terms of reference for the TTCG are defined as:
  - "Provide the national tactical decision-making forum for all border activity at senior management level
  - Facilitate informed, reasoned, and collaborative tasking and decision making
  - Work with Border Force intelligence and senior managers to understand and agree priorities
  - Work with partners to understand and agree requests and priorities
  - Direct and agree Border Force operational tasking in line with:
    - the Border Force National Control Strategy
    - current cross-agency threat assessments and intelligence picture
    - performance considerations
    - senior management and political requirements
  - Remit agreed TTCG taskings to the Border Force National Operational Tasking and Co-ordination Group for operational development, and planning and management of the activity
  - Ensure that agreed tasking is reviewed, assessed, and formally evaluated to ensure objectives are met, and that evaluation is used to inform future tasking
  - Ensure operational proposals are considered in sufficient time to secure resource and allow detailed planning – this will normally be a minimum of 6 weeks before delivery of activity."

**8.42** The TTCG is owned by Border Force and is chaired by the Deputy Director of Border Force National Operational Headquarters Operational Tasking and Co-ordination Team, or their representative. The meeting is held monthly.

#### **Assessment of the TTCG process**

- **8.43** The meeting is only attended by Border Force staff and consists of representatives from:
  - National Operational Headquarters Operational Tasking and Co-ordination
  - Regional Deputy Directors
  - Intelligence Analysis Directorate
  - Targeting
  - Readiness Task Force
  - National Detector Dog Team
  - Performance Reporting and Analysis Unit
  - Operational Assurance Directorate
  - Maritime Command
- **8.44** The TTCG previously followed a similar meeting structure to the STCG, in that the meeting was divided into internal and external sessions. The chair of the TTCG abandoned the external part of the meeting as they felt it was a duplication of effort.
- 8.45 One external partner told inspectors that they now "brief into colleagues in Border Force ahead of time and ask them to take it there [the TTCG]. If you don't have someone there to explain the details, I think things get lost in translation. It was a conscious decision by Border Force not to invite us anymore. I'm not sure it's the right decision."
- 8.46 Another external partner told inspectors that the decision to exclude them was "missing a trick to bring business to an agency and seek their approval for and access to resources and assets dynamically". Another said, "Our dial-in to the TTCGs stopped recently ... by losing that monthly dial-in you lose the opportunity to get a feel for what other people are seeing and feeling."
- 8.47 A senior manager in Border Force explained to inspectors that, "the Border Strategy Group (BSG) is the best place for the interaction and to add the value, so that's where it happens. We speak to them [partners] every day. We can bring partners to the TTCG if it's appropriate."
- 8.48 Inspectors were told that the BSG meetings with partners took place monthly and focused on specific threat areas, including drugs, firearms, strategic exports, tobacco, alcohol, insider threat, and national security. The BSG feeds into the TTCG which is why it was decided to remove the external element from the TTCG meeting structure.
- 8.49 A senior manager told inspectors that the threat assessments and control strategy were useful documents and that they were agile and provided an effective framework to support decision making. They told inspectors, "They are not written in stone in January then not looked at again ... they are agile, as they need to be ... border threats are ever-changing. They are able to pick up new events as and when they happen."
- **8.50** Inspectors noted that the terms of reference relating to this meeting still referred to external partners as core members and therefore needed to be amended.

#### **Conclusions**

**8.51** Figure 13 below summarises areas of the TTCG that are working well and areas that require further attention.

Figure 13: Conclusions – Tactical Tasking and Co-ordination Group

Working well	Requires attention
Threat assessments are agile	<ul> <li>The terms of reference for the TTCG require updating to reflect the change to external partner attendance</li> </ul>
	<ul> <li>No external partners attend the TTCG</li> </ul>
Conclusions	
The decision to exclude external partners from the TTCG process was not fully understood by some. Further communication and engagement with external partners would be beneficial.	
The threat assessments were agile and able to respond to dynamic challenges.	

## **Intelligence Tasking and Co-ordination Group**

## Border Force Intelligence Directorate's role in the Intelligence Tasking and Co-ordination Group

8.52 The Border Force Intelligence Tasking and Co-ordination Group (ITCG) is described in the terms of reference document as "a strategic and tactical decision-making forum. It is used to set, prioritise and monitor intelligence activity within Border Force in response to strategic intelligence requirements."

#### Terms of reference

- **8.53** The terms of reference for the ITCG are defined as:
  - "ITCG should consider and approve the tactical assessment before it is disseminated to recipients. For this purpose, ITCG should be held one week prior to the Tactical Tasking and Co-ordination Group (TTCG)
  - ITCG has overall responsibility for managing and filling the strategic intelligence requirements identified from the strategic assessment
  - The ITCG uses the Border Force Control Strategy and intelligence products to make submissions to the TTCG so that they may consider, and task resources as required in response to problems identified and priority intelligence requirements
  - It should also be used to approve any intelligence taskings that need to go TTCG for consideration and action
  - ITCG is the forum to be used by Border Force Intelligence Directorate (BFID) Strategic Leads
    if they wish to raise and allocate taskings
  - BFID modal hubs should also consider raising strategic taskings and problems for discussion through ITCG that require a cross-directorate response

- Border Force Operations will be represented at ITCG by National Operations Tasking and Co-ordination colleagues
- Partner agencies and other parts of Border Force Operations will on occasion be invited to ITCG to discuss taskings that require BFID support and approval
- ITCG can refer taskings that require an operational/tactical response to the Operational Intelligence Tasking and Co-ordination Group (Ops ITCG)."
- 8.54 The ITCG is owned by Border Force and is chaired by Intelligence and Analysis. It should be attended by all deputy directors, assistant directors, and any relevant capability leads in Border Force intelligence. It should also have representation from Border Force National Operational Headquarters Operational Tasking and Border Force International. Partner agencies may be invited on an ad-hoc basis.
- **8.55** The ITCG is the forum for strategic leads to raise and allocate taskings.

#### **Assessment of the ITCG process**

- **8.56** The minutes from the ITCG meetings, a terms of reference document, strategic threat assessments, key intelligence requirements, and the control strategy were reviewed by inspectors. Inspectors also interviewed Border Force senior managers and analysts who attended or supported the ITCG process, along with frontline managers working at the Humber ports.
- 8.57 Inspectors reviewed the minutes of the ITCG meetings held between April 2021 and June 2022 and observed that they were clear and well structured. The minutes recorded the outcomes of decisions and the allocation of actions to both frontline and intelligence function resources. Operational initiatives agreed at the meeting varied in size and scope but included the tactical plans to mitigate threats through multi-agency intensification projects.

#### **Intelligence products**

- 8.58 Analysts produce monthly and quarterly threat assessments. The quarterly threat assessment is the update to the annual strategic threat assessment, and the monthly assessment is a tactical threat assessment. Analysts also produce problem and subject profiles, both of which are presented to the ITCG for colleagues to identify mitigation opportunities against the threats. Threat assessments and intelligence requirements are agreed, actioned, and disseminated internally and externally by the ITCG.
- 8.59 Intelligence products are shared with analysts from other organisations in a collaborative and productive way. This acts as a 'peer review' process and enables partners to contribute to the product.
- 8.60 Inspectors asked frontline managers about the access they had to intelligence products.

  One said, "I have had a couple of packages on clandestine [entry] ... counter-terrorism and drugs. I thought they were too pretty, too detailed, too graphic-orientated and missing the key messages which enable outcomes. They can be quite lengthy to read as well." Another could not recall ever receiving an intelligence product.

#### **Communication and engagement**

8.61 Senior managers in the intelligence function did not feel engaged in the ITCG process. One told inspectors, "I don't contribute to be honest as my team aren't tasked ... I'm there to listen and see what's being said" and "a lot of stuff that gets talked about is international ... genuinely haven't done it for a long time, I'm not sure anyone's been going to be honest." Another described the meeting as "dreadful ... there were only 15 minutes on maritime intelligence in 2 ½ hours".

#### **Conclusions**

**8.62** Figure 14 below summarises areas that are working well in the ITCG and areas that require attention.

Figure 14: Conclusions – Intelligence Tasking and Co-ordination Group

Working well	Requires attention
<ul> <li>ITCG meeting minutes were clear and well structured. They recorded the outcomes of decisions and the allocation of actions to both frontline and intelligence resources</li> </ul>	<ul> <li>Some senior managers did not feel engaged at the ITCG meeting</li> </ul>
<ul> <li>Threat assessments and intelligence requirements were distributed internally and externally</li> </ul>	<ul> <li>The communication and understanding of intelligence products to frontline staff at the Humber ports should be reviewed</li> </ul>
<ul> <li>Collaboration with partner agencies across analytical functions in the production of intelligence products is effective</li> </ul>	

#### **Conclusions**

The meeting structure is well designed and delivered, providing a pathway for intelligence development and for the intelligence requirements to focus frontline activity.

Strategic threat assessments and products were distributed internally and externally in a collaborative and productive process. It was not always clear how these intelligence products were communicated to frontline staff at the Humber ports. Managers either did not see the documents or, if they did, the documents were lengthy and complex.

Senior managers in the intelligence function did not feel engaged in the ITCG process, as the majority of the content did not relate to their areas of responsibility.

## **Operational Intelligence Tasking and Co-ordination Group**

## Border Force Intelligence Directorate's role in the Operational Intelligence Tasking and Co-ordination Group

8.63 The Operational Intelligence Tasking and Co-ordination Group (Ops ITCG) meets on a fortnightly basis to consider the tactical assessments and to formulate an intelligence response to the

problems and intelligence requirements identified in line with control strategy priorities. Its other function is to manage the tasking process between Border Force intelligence functions.

8.64 The Ops ITCG should be attended by Senior Officers (SO grades) or approved deputies from across BFID and is chaired by the Assistant Director of the Border Force National Intelligence Hub (BFNIH) and Command and Control Unit (CCU).

#### **Terms of reference**

**8.65** The 'aim and purpose' of the Ops ITCG are defined as:

"The purpose of this meeting is to plan, task, and co-ordinate intelligence activity between the various teams within the Border Force Intelligence Directorate as part of the new 'Target Operating Model'. It is designed to reduce duplication and silo working, as well as provide a forum to collectively discuss and respond to identified emerging and changing problems.

The meeting will be used to support existing governance processes, primarily the ITCG and TTCG."

"The meeting will also be used to develop the tactical assessment and consider options for tactical recommendations prior to the ITCG. The intelligence analysts will be expected to provide an input regarding emerging/changing tactical problems for discussion at this meeting. However, this meeting should also be used as a forum for all intelligence colleagues to share and discuss any new or emerging problems in their area with colleagues in other parts of the directorate. This discussion and sharing of information should be used to inform the tactical assessment.

The group can escalate matters and problems to be raised and discussed at the ITCG if the group decides that they need to be considered at a senior level. Equally, the ITCG can refer matters for tactical/operational resolution to this meeting for further scoping and resolution."

#### **Assessment of the Ops ITCG process**

- 8.66 The Ops ITCG meeting structure is relatively new, having been introduced in 2021, and is still being embedded across the Border Force Intelligence Directorate. Minutes of the meetings are recorded, and inspectors reviewed them for the meetings held between January and June 2022. The meetings followed a set agenda and covered previous actions, emerging threats, updates on existing taskings, new taskings, emerging taskings, and team updates.
- 8.67 Although reference to the monthly tactical assessment and associated intelligence requirements was made during the meetings, the minutes did not show any record of any tactical mitigation or problem solving of the issues identified, which should be a key aim of the meeting. Inspectors were therefore unclear as to how the meeting added value and provided solutions to support senior managers to develop strategy and implement tactical resolutions at the ITCG, TTCG, and STCG.
- 8.68 It was also not clear how the Ops ITCG linked into the ITCG as an escalation mechanism. Inspectors reviewed the action matrix from the Ops ITCG and established that no taskings were escalated to the ITCG through this meeting structure between January and June 2022.

One manager told inspectors, "I don't think there's much of a connection between them to be honest."48

#### **Tasking volumes**

- 8.69 The Home Office provided inspectors with a spreadsheet which recorded all taskings considered at the Ops ITCG between January and June 2022. Inspectors established that [redacted] taskings were received during this six-month period and that, of those, only one request was not supported. This specific tasking related to a training need for frontline staff and was progressed through a more appropriate mechanism.
- 8.70 Time-critical taskings are managed through a 'hot tasking' process, allowing intelligence teams to task each other dynamically outside the meeting structure. A record of the tasks was maintained by the Command and Control Unit and discussed at the next regular Ops ITCG meeting. Time-critical taskings were progressed outside the tasking meeting on [redacted] occasions, and these were included in the overall total of [redacted] taskings.
- **8.71** Only [redacted] of the taskings received between January and June 2022 were recorded as having been completed, [redacted], some of which had no update. [Redacted].
- 8.72 The ambition to collect data to understand tasking volumes, and therefore demand on resource, is an important management tool. Inspectors reviewed the master spreadsheet and assessed the volumes of taskings in and out of the different functions. The spreadsheet did not enable information to be filtered in a simple or effective manner. For example, the 'requesting unit' tab had multiple descriptions for some of the teams. The Gateway Multi-Agency Hub (MAH) was referred to as 'MAH Gateway' and 'BFID MAH Gateway Hull FIC'. Similarly, the Accompanied and Unaccompanied RoRo Modal Hubs were also described differently.
- **8.73** The allocation of tasking was also recorded in an inconsistent format, sometimes referring to 'collection' and other times as a specific collection group, i.e., IG1. This format did not allow for the effective management of information to establish the volumes of tasking received by each collection group.
- 8.74 Inspectors concluded that the Ops ITCG meeting structure did not effectively seek updates and assess tasking progression. The master spreadsheet was incomplete and recorded information inconsistently, which made the collection and assessment of management information difficult.
- **8.75** [Redacted].

Figure 15: Number of taskings considered at the Ops ITCG meeting or received as 'hot taskings' (January 2022 to June 2022)

[Redacted].

**8.76** [Redacted].

Figure 16: Number of taskings allocated by the Ops ITCG meeting by receiving team (January 2022 to June 2022)

[Redacted].

<sup>48</sup> The Home Office, in its factual accuracy response, stated: "No taskings were received by Ops TCG that required escalation to the ITCG" and further added, "the same threat picture is presented at both the Ops TCG and the ITCG by an analyst to ensure consistency and a common awareness of threat."

- 8.77 Inspectors interviewed managers who engaged with the Ops ITCG process, specifically those managers with responsibility for the Humber ports. The overwhelming view was that the Ops ITCG meeting structure was ineffective as a mechanism for delivering dynamic tasking across the intelligence functions. A manager in Gateway MAH told inspectors that the process "added another layer of bureaucracy", and a senior intelligence manager said, "It's a bit bureaucratic, if you put too many layers in the tasking process; it erodes your ability to be agile".
- 8.78 Intelligence managers told inspectors that taskings were agreed before the Ops ITCG meeting. They said of the meeting, "they are approving something that has already been agreed in advance. You'd have the conversation beforehand" and "the Ops TCG is a waste of time ... because the tasking was all sorted out in advance by the teams before the meetings."
- 8.79 Another manager told inspectors that, "I don't always attend. It's for business-as-usual taskings ... tasking hasn't gone as well as I thought, it might be better if Higher Officer colleagues went ... I have submitted taskings but haven't seen results."

#### Collection

- **8.80** The meeting was described by other managers as "long-winded", "tasking to collection is clunky ... and is a barrier" and, "overall, it convolutes the process, you need to have the trust in people who know what they are doing but I can understand why they want that assurance step".
- 8.81 Many of the intelligence managers interviewed expressed uncertainty and a lack of understanding about the role and capabilities of the collection team, which reflected the views of collection staff themselves, particularly in Hull, as described in chapter 6. This resulted in establishing workarounds, and taskings not being submitted in the first place.
- 8.82 One frontline manager told inspectors how they identified an opportunity to improve engagement between their team and the collection team. They had suggested that frontline staff accompany the collection team on one of their routine visits to a local harbour to meet with the harbour master and make introductions. Although this appeared to be a straightforward and simple request, the manager was told to submit a tasking request to the Ops ITCG for approval.
- **8.83** Inspectors considered that this type of activity should not require any resource management or prioritisation oversight, and that it created a barrier to effective relationship building across teams and with external partners.
- 8.84 Senior managers involved in the management and oversight of the Ops ITCG also recognised that some changes were needed to improve the effectiveness of this tasking process and told inspectors that a review of the Ops ITCG was being considered.
- 8.85 One senior manager told inspectors, "There's a huge nervousness about putting everything through a TCG so it's recorded, it's a lack of trust in people's decision making".
- **8.86** Figure 17 below summarises areas that are working well in the Ops ITCG and areas that require attention.

Figure 17: Conclusions – Operational Intelligence Tasking and Co-ordination Group (Ops ITCG)

Working well	Requires attention
<ul> <li>Hot tasking for time-sensitive action is an enabler but could be used more widely</li> </ul>	<ul> <li>The meeting does not formulate any intelligence responses or tactical assessments</li> </ul>
The vision and ambition to create the meeting structure is a positive step in becoming more NIM-compliant	<ul> <li>The process is bureaucratic and does not facilitate timely tasking across teams or empower managers to make decisions</li> </ul>
	<ul> <li>The master spreadsheet is incomplete, and information is recorded inconsistently</li> </ul>
	The volume of completed tasking is low
	No tasking had been escalated to the ITCG

#### **Conclusions**

The Operational Intelligence Tasking and Co-ordination Group (Ops ITCG) meeting structure, although a useful mechanism to bring managers from different functions together, still had considerable room for improvement. The majority of taskings allocated at the meeting were for the collection function, as displayed in figure 14, and it is therefore important that tasking to he collection team is streamlined and made an easier and simpler process. After all, it is the manager in the collection team who will need to resource and prioritise the tasking requirements.

The Ops ITCG should consider the tactical assessments and formulate an intelligence response to the problems and intelligence requirements identified in line with control strategy priorities. It was not clear how the Ops ITCG added value and provided solutions to support senior managers to develop strategy and implement tactical resolutions at the ITCG, TTCG, and STCG. Neither was it clear to inspectors how the Ops ITCG linked into the ITCG as an escalation mechanism. Inspectors observed that no taskings had been escalated to the ITCG.

The master spreadsheet was incomplete and recorded information inconsistently, which makes the collection and assessment of management information difficult. The low numbers of completed taskings recorded on the database and a lack of accountability or challenge do not enable managers to understand demand on resources.

Tasking is agreed prior to the meeting taking place and therefore the meeting does not act as a decision-making forum. The tasking process should be reviewed to enable local managers to make decisions, engage with colleagues, and seek resolutions in a timely and more efficient manner.

The Ops ITCG should focus more time on assessing outcomes, holding the owners of tasking to account with progress updates, and sharing lessons learnt and good practice. This would improve efficiency and timeliness, and should enhance the working relationships between teams. The taskings should still be recorded centrally to support the collection of management information.

## **Modal Hub Tasking and Co-ordination Group**

- 8.87 The purpose of the Border Force Modal Hubs Tasking and Co-ordination Group (TCG), as described in the terms of reference document, is, "to plan, prioritise and co-ordinate activity within the respective teams. It should be used to direct and inform resourcing decisions as well as authorise and prioritise operational and intelligence collection/development activity."
- 8.88 Inspectors focused on the Unaccompanied RoRo Modal Hub and the Gateway Multi-Agency Hub during the inspection process. The Modal Hubs TCG should be chaired by the assistant director of the respective modal hub.

## **Assessment of the Modal Hub TCG process**

## **Unaccompanied RoRo Modal Hub TCG**

- 8.89 Inspectors interviewed managers who worked in the Unaccompanied RoRo Modal Hub (UMH) and attended their TCG meetings. The UMH holds monthly TCG meetings to discuss workflows, priorities, and recent seizures. A senior manager provided the team with a strategic update and discussed the taskings that required escalation, either to the Ops ITCG or the ITCG.
- 8.90 Managers told inspectors that when taskings were identified they were passed on through the tasking process. One manager said that all the taskings submitted from the hub had been accepted and adopted. The majority of taskings originating from this meeting were for allocation to the collection team.
- 8.91 The UMH received very little tasking from other areas of the tasking process. One manager told inspectors that, "I don't know of [redacted]... it needs to be streamlined and more efficient ... we would like to see more tasking coming back to us." Another manager could only recall [redacted] of a tasking being received. Inspectors observed that between January and June 2022, the UMH received [redacted] taskings from the Ops ITCG.
- 8.92 Inspectors concluded that the TCG meeting provided a pathway to escalate taskings to other decision-making forums, but they observed that the tasking volumes received by the UMH were low. During the period January to June 2022, the UMH submitted [redacted] taskings into the Ops ITCG and was tasked by the meeting on [redacted] occasions.

## **Gateway Multi-Agency Hub TCG**

- 8.93 Inspectors reviewed minutes of the Gateway Multi-Agency Hub (Gateway MAH) TCG meetings and noted that they were well structured and detailed. The chair of the meeting rotated between agencies, enhancing the collaborative working environment in the MAH. The members discussed cases under development and identified opportunities to task development work to other colleagues outside the MAH.
- **8.94** Although the Gateway MAH identified taskings for escalation to the Ops ITCG, very few were resolved to a satisfactory standard. A manager told inspectors that the MAH had not received any taskings from the Ops ITCG. They said they had had "no taskings into us since it started".
- 8.95 Inspectors concluded that the TCG meeting provided a pathway to escalate taskings to other decision-making forums but observed that the Gateway MAH only submitted

[redacted] taskings to the Ops ITCG between January and June 2022 and received [redacted] taskings from it.

## **Conclusions**

**8.96** Figure 18 below summarises what is working well and what requires attention in the hub TCGs.

Figure 18: Conclusions – Modal Hub Tasking and Co-ordination Group

Working well	Requires attention
<ul> <li>The TCG meeting provides a pathway to escalate taskings to other decision- making forums</li> </ul>	<ul> <li>The level of tasking received into these meeting structures is low</li> </ul>
<ul> <li>The meeting works well as a management tool to understand workflows and day to day demand issues</li> </ul>	

#### **Conclusions**

The TCG meeting provides a pathway to escalate taskings to other decision-making forums. Very little tasking is received into the hubs from other tasking meetings, namely the Ops ITCG.

The Gateway MAH meeting is well structured, and detailed minutes are produced. The chair of the meeting rotates between agencies, enhancing the collaborative working environment with the MAH.

## 9. Inspection findings: communication and engagement

9.1 The ICIBI 'expectations' state that each immigration, asylum, nationality or customs function should have a Home Office (Borders, Immigration and Citizenship System) 'owner'. This includes communication and collaboration with other government departments, other affected bodies, and stakeholder engagement.

## Internal engagement

#### **Engagement between intelligence and frontline staff**

- **9.2** The 'Border Force Intelligence Function Review', carried out in 2019, noted:
  - "The relationship between BFID [Border Force Intelligence Directorate] and the frontline should be at the heart of Border Force's operational delivery. However, the reality is that the relationship is fractured."
- 9.3 Inspectors were provided with a copy of a presentation on the PIONEER target operating model that was introduced following the 2019 review. It listed losing touch with frontline officers in some ports, particularly regional airports, as a potential risk of the new model. During interviews with frontline staff at Hull, numerous staff told inspectors that they did not know who the collection officers were or had very limited contact with them following the PIONEER restructure.
- 9.4 In focus groups and interviews, staff told inspectors of instances when intelligence teams located in the same building did not interact. A manager in Collection told inspectors that the biggest criticism they had of PIONEER was that, as modal hubs now had primacy for debriefing, there could be instances when the collection capability was not aware of what was happening "on our own patches".
- 9.5 Managers and officers in intelligence and frontline functions told inspectors that they were unclear about the role and remit of collection officers. A senior manager said there was "confusion on who does what and where", and an operational manager stated, "I know the collection staff, but I don't speak to them. I'm not fully sure what their role is."
- 9.6 Some collection officers told inspectors that before the restructure they would receive emails from frontline officers and conduct intelligence checks. They said that frontline officers were more inclined to invite collection officers to assist them. Frontline officers said they no longer had regular interactions with collection officers. Instead, requests for intelligence checks were routed through the Border Force National Intelligence Hub (BFNIH) or through Central Operations Platform (COP) or Single Intelligence Platform (SIP), and relationships had been lost.
- 9.7 Senior intelligence managers told inspectors that there had never been a directive that officers and staff should not speak to frontline colleagues. PIONEER was not intended to prevent these

conversations happening and it had simplified the process for frontline staff to feed intelligence into the process.

- **9.8** The PIONEER programme 'Final Lessons Learned Review', conducted in April 2022, identified that:
  - 1. "A communication strategy should be developed from the start of a programme.
  - 2. Communications need to consider the diversity and complexity of the business.
  - 3. Continue to seek feedback from programme communications.
  - 4. The role of the programme team and any associated individuals should be effectively communicated to the business."
- **9.9** Despite this, inspectors noted that the 'MINERVA Risk Report' for June 2022 included an amber risk relating to a "lack of resources and a dedicated communications team...".
- 9.10 Knowledge of the MINERVA programme was inconsistent across different teams and grades, both within and outside Home Office Intelligence. While some teams had received email communications about the MINERVA programme, a senior manager told inspectors there had been some rebranding and they were "just told to change [their] signatures on email". They added that no answers were provided to questions raised by staff about MINERVA, which had caused confusion. Border Force senior officials disputed this.<sup>49</sup>
- 9.11 A senior manager told inspectors that MINERVA needed direction and a target operating model to succeed. Another manager said there was not much information about how it would work in future and how it would work with the control strategy. In contrast, staff from Home Office Intelligence Analysis (HOIA) told inspectors that, while they felt they should know more about MINERVA, they had been to "various talks" where they had been told about it. A senior manager said that communication was "not bad" and that, while directors generally provided updates, their frequency needed to be increased to enable staff to understand the joined-up process.
- 9.12 Senior managers told inspectors that the end state of MINERVA was clear it was a merged Home Office intelligence capability. However, they acknowledged that there was ambiguity as to how that would be achieved due to other changes taking place in the Home Office. They explained the challenges in communicating MINERVA to staff. Emails, Microsoft Teams meetings, and a regularly updated Microsoft SharePoint page were all accessible to staff. In addition to this, MINERVA roadshows were being rolled out, and there were plans for MINERVA staff to attend team meetings.
- 9.13 Staff from different teams and at various grades told inspectors about their concerns over 'change fatigue'. One said, "There has been change overload. I don't read anything to do with Minerva, I see it and delete it." A senior manager told inspectors that change was the biggest challenge they faced, saying, "everything is changing around us" and "we're going through so much change and it's a constant".
- 9.14 Senior managers were aware of this, and the MINERVA team made a decision not to overwhelm staff with information. MINERVA communications were tailored to staff using a mixture of 'lunch and learn' sessions and modern methods of communication to aid team level decisions. They were mindful that they did not always get communication right

<sup>49</sup> The Home Office, in its factual accuracy response, stated: "This is inaccurate. All staff were told what to do to change the signatures and why we were doing this. Staff were given options to ask questions and make comments by sharing Minerva inbox details. All questions were answered at all times."

but said they communicated proactively to ensure messages about the programme were conveyed effectively.

## **External engagement**

**9.15** Border Force is fully aware of the importance of effective engagement with partners. A presentation on the PIONEER programme, dated 2020, stated:

"Our current structure and infrastructure isn't conducive to strategic partnership engagement. We need to professionalise our workforce and work more closely together and with partners to have a bigger impact on SOC [serious and organised crime] and OIC [organised immigration crime]. We need to gain their confidence by collecting intelligence, developing intelligence, interrogating data and targeting threat."

**9.16** This was also recognised in the 'Independent Review of Border Force', undertaken by Alexander Downer, which was published in July 2022:

"Successful operation of the border is dependent on the public and private sector working in partnership to ensure that it operates smoothly and efficiently, whilst maintaining essential safety and security standards."

#### Other government departments

9.17 During interviews with inspectors, some other government department (OGD) representatives said that there was room for improvement in their engagement with Border Force, with one citing tension over the priority ratings in the control strategy. Some OGDs said they would like to receive more information from Border Force to help them understand Border Force's pressures and priorities. But they also accepted that they needed to increase their efforts to improve engagement with Border Force.

#### Law enforcement agencies

- 9.18 Law enforcement agency (LEA) representatives told inspectors that where Border Force teams worked closely with LEAs, the relationship was positive. The co-location of Border Force staff with LEA officers in multi-agency hubs, such as the Gateway Multi-Agency Hub (Gateway MAH), had helped to improve engagement between LEAs, OGDs, and Border Force. LEA staff working in the Gateway MAH praised the teamwork and relationships within the hub, and one LEA was planning to make a temporary embedded officer permanent in the hope that this would further improve intelligence flows.
- **9.19** [Redacted].<sup>50</sup>
- 9.20 Border Force staff in Border Force Law Enforcement Partnerships said that the relationship with their partners was improving but the change from a regional to modal approach under the PIONEER programme was confusing for partners. This was because LEAs targeted threats, such as drugs and firearms, while Border Force targeted modes. An LEA representative said that the change in approach made it "very difficult to get an overview of what is happening at a particular port and there is a fear that intelligence could be missed...".

9.21 The Hull collection team was created in January 2022, and officers told inspectors that one of their current priorities was to work on engagement and create contacts. Although collection officers had met with LEAs, they said that the move from regional intelligence units to modal hubs had affected those relationships. They now had to encourage LEAs to submit intelligence to the BFNIH, to ensure correct and timely processing, rather than to local intelligence teams.

#### **East Coast Partnership Engagement Lead**

- **9.22** A Border Force frontline manager in the Humber ports had the role of East Coast Partnership Engagement Lead, which included:
  - "leading the co-ordination and facilitation of the Joint Action Group (JAG) for both commands within the North East and Yorkshire and Humber (NEYH) region
  - ensuring that there were viable terms of reference in place to manage the effective flow of information between the LEAs in NEYH
  - ensuring the JAG took place regularly and proactively drove the operational plans of both commands within their tasking and co-ordination group (TCG) structures
  - engaging with National Crime Agency (NCA) partners in a co-ordinated way
  - partnership engagement with His Majesty's Revenue & Customs (HMRC), Counter
     Terrorism Policing (CTP), local police, and the Department for Work & Pensions (DWP)"
- 9.23 In addition to the JAG, the LEAs told inspectors about a quarterly Yorkshire and Humber Joint Working Group, chaired by Border Force. The meeting considered information that arose from the JAG, and included representatives from Border Force frontline senior officers, Immigration Enforcement, HMRC, NCA, Humberside Police, CTP, Regional Organised Crime Units (ROCUs), and the Forward Intelligence Cell (FIC) (which represented the Border Force intelligence function). An LEA representative told inspectors that this meeting enabled "all partners to discuss emerging trends and current intelligence potentially impacting on the border, and any joint operations proposed". Frontline officers told inspectors that this was how they engaged with the LEAs.
- 9.24 The East Coast Partnership Engagement Lead told inspectors that there was no one in Border Force Intelligence Directorate (BFID) carrying out a similar role. He said that the manager of the FIC in Hull, with whom he was in regular contact, was the closest role in intelligence to a regional intelligence officer. An intelligence manager told inspectors that when the PIONEER programme was introduced, they had asked who would attend regional intelligence meetings. Having received no answer, they had continued to attend them, saying, that if they did not go, "nobody else will".
- 9.25 There was a mutual lack of awareness of the roles of the East Coast Partnership Engagement Lead and intelligence teams. Collection officers in Hull told inspectors that they used the East Coast Partnership Engagement Lead as their 'go-between' with the NCA and other agencies, but the engagement lead told inspectors that, although he knew who the collection officers were, he rarely spoke to them.

#### **Forward Intelligence Cell**

9.26 Law enforcement agency views of the Forward Intelligence Cell (FIC) in Hull varied. Some said that it provided them with faster access to intelligence and had increased their interaction with the ports. One representative said that the concept of the FIC was "brilliant". While the

- PIONEER restructure had led to the loss of some expertise and contact, they said that the FIC had improved the situation.
- 9.27 Other LEA representatives were less positive. One LEA said there was a lack of clarity about the role of the FIC, adding that it was duplication of an intelligence team in a Regional Organised Crime Unit (ROCU). Senior managers in Border Force Intelligence Directorate (BFID) told inspectors that this was not the case, as the work and remit of the multi-agency hubs (MAHs) and ROCUs differed.
- 9.28 While most LEA representatives were aware of the Gateway MAH, knowledge of the FIC and its role as an extension of the Gateway MAH in the north was limited. One told inspectors that they only found out about its creation from another external partner, and they had to ask Border Force to be invited to its meetings. Another said they had not received intelligence from the FIC, and monthly policing meetings had been cancelled as FIC representatives did not attend them. An LEA told inspectors, "The people are in place, the key concepts around a FIC, multi-agency Border Force lead intelligence cell is in place, it now just needs to be moulded into a productive and conducive unit, delivering key actionable intelligence."
- 9.29 The lack of awareness of the FIC's role was acknowledged by a FIC manager, who told inspectors, "I'm not sure if the ROCUs are aware of the FIC or what we do". They also said that LEA partners did not understand the role of the FIC, as the modal approach was "too narrow".
- **9.30** There was also a lack of knowledge about the FIC within BFID. A member of the FIC told inspectors that sometimes other parts of Border Force dealt with intelligence relating to FIC's area of responsibility without FIC's knowledge.
- **9.31** Senior managers said that the FIC "could deliver more than it does" and that it may benefit from rebranding to make the connection to Gateway MAH clearer.

#### **Industry stakeholders**

- **9.32** The level of engagement between Border Force and industry stakeholders varied at the local and national level. One stakeholder told inspectors that they found Border Force's "hierarchical approach ... restrictive and difficult to penetrate".
- 9.33 Industry stakeholders in the Humber ports told inspectors that they had a generally positive day-to-day relationship with frontline Border Force officers, mostly through information exchanges with individual officers. Aside from this local-level engagement, there was little strategic interaction and no national engagement on intelligence. One stakeholder told inspectors that conversations were not taking place, adding, "it's not where it used to be or should be".
- 9.34 The meetings they had with Border Force were described as reactive and not strategic, "Dover gets too much focus. I think the north and east coast gets forgotten and people think it works so don't focus on it on a strategic level." The exception to this was targeting officers in the Unaccompanied Modal Hub who had access to the stakeholder's online customer information through a standalone computer terminal.
- 9.35 During this inspection, inspectors accompanied collection officers on a visit to a small harbour in their region. The harbour master was reminded about Project KRAKEN and provided with updated KRAKEN promotional material. The harbour master was aware of the aims of KRAKEN, knew how to report suspicious activity, and was keen to do so. During this meeting, the

harbour master told officers of a meeting he attended with other east coast harbour masters where they shared information about suspicious activity or criminal behaviour. It was unclear if the collection officers planned to seek an invitation to this meeting in order to engage and build relationships with other harbour masters.

- 9.36 Stakeholders also told inspectors about a North Sea Sub-Maritime Group meeting with Border Force, which was no longer held but which they were "incredibly keen" to restart. Another stakeholder told inspectors that Border Force had not attended a local resilience forum, which they saw as an opportunity to discuss trends and build relationships with other industry partners.
- 9.37 Industry stakeholders were willing to share information with Border Force, but this was hampered by the lack of a clear process. They were unaware of the Border Force National Intelligence Hub and the FIC in Hull as ways in which to pass intelligence to Border Force. They did not have contact details for, or a relationship with, any Border Force intelligence teams. They commented that Border Force was "missing a trick" by not asking for intelligence, and that its "eyes and ears" were not being utilised.
- **9.38** The lack of, or inconsistent, engagement with industry stakeholders was a known problem among intelligence officers in Hull. A FIC officer told inspectors that this was "a massive area for development".
- **9.39** [Redacted].<sup>51</sup>
- 9.40 A senior manager told inspectors that the Freight Engagement & Data Acquisition Team (FEDAT) and staff in the Humber ports should be engaging with maritime industry stakeholders. They said that some staff did not engage with industry stakeholders "through fear", adding that, "FEDAT have been there four years and we need to work out what they do". Another senior intelligence manager told inspectors that trade engagement in Hull had been on hold for three years.
- 9.41 Some intelligence staff were confused about whose role it was to engage with industry stakeholders. An intelligence manager told inspectors that collection officers should be engaging with industry stakeholders, including shipping agents, importers, and traders. However, some collection officers told inspectors that this was the responsibility of the Unaccompanied Modal Hub (UMH). UMH staff were unsure whether this was part of their remit or a role for collection officers. A senior manager acknowledged that there was confusion about "who does what, where", adding that they could improve and were looking to engage with port operators.
- **9.42** Stakeholders told inspectors that when they did provide information or intelligence to Border Force, they did not receive any feedback. By not providing feedback there is a risk that stakeholders will stop providing information to Border Force.

#### **Conclusions**

**9.43** Figure 19 below summarises the areas of communication and engagement that are working well and those which require attention.

Figure 19: Conclusions – communication and engagement

Working well	Requires attention
<ul> <li>Engagement with other government departments</li> </ul>	<ul> <li>Clarification of the role and remit of collection officers</li> </ul>
	<ul> <li>Awareness and knowledge of the branding of the Forward Intelligence Cell's remit</li> </ul>
	Stakeholder engagement:
	<ul> <li>Clarity required over who has responsibility for external engagement</li> </ul>
	<ul> <li>The need for a single point of contact for regional intelligence and clarity over who holds responsibility for it</li> </ul>

#### **Conclusions**

Border Force Intelligence Directorate's (BFID's) engagement with other government departments is positive, and BFID is seen as a valued partner. The creation of multi-agency hubs and the co-location of Border Force staff and law enforcement agencies' embeds have strengthened relationships.

The ability of collection officers in Hull to deliver the collection strategy is hampered by a lack of training and experience, and there is confusion about the role of the collection team. Communication between BFID and the collection team decreased following the implementation of the PIONEER target operating model, which led to a reduction in taskings for the team. The Hull collection team is working to re-build relationships, but there is a need to clarify the role of the collection team and how it should be tasked.

Knowledge of the Forward Intelligence Cell (FIC) and its role and remit was inconsistent. Those that worked in the FIC said it had led to unity among partner agencies, but there was a lack of knowledge about its purpose from staff and stakeholders. The FIC should promote the services it provides and review its name and branding to provide clarity on its remit.

There is a lack of clarity around roles and responsibilities for engagement with law enforcement and industry stakeholders within BFID. While day-to-day engagement between industry stakeholders and frontline Border Force staff was positive, the lack of a single point of contact and clear processes hampered the effective sharing of intelligence.

Border Force Intelligence Directorate should increase engagement with industry stakeholders to benefit from and exploit the information they are willing to share.

## 10. Inspection findings: recruitment and retention

- One of the ICIBI's 'expectations' is that anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent. Inspectors considered how staffing resources were managed, including recruitment and retention of staff, in Border Force Intelligence Directorate (BFID).
- 10.2 The PIONEER vision was to "create an agile and flexible organisation which enables us to operate as one team, with greater focus, accuracy, and effectiveness by creating a responsive, valuable, national intelligence-led capability that eradicates siloed behaviours and can respond to the dynamic nature of threats at the UK border."
- 10.3 In the 'Border Force Business Plan 2022-23', Border Force recognised the importance of recruiting and retaining a skilled and motivated workforce to achieve its objectives, as two of its key themes were recruitment and professionalism:
  - "recruitment boosting and regularising our recruitment campaigns to increase our frontline workforce to effectively manage rising passenger demand, in particular at peak periods
  - professionalism building on existing good practice so that all our teams, including the frontline, have pride in what they do and how they reflect that in their day-to-day work"
- The Home Office Intelligence target operating model aims to create a "diverse, highly-skilled workforce where our people are motivated, engaged and empowered to fulfil their potential". It also states that, "We will improve the identification, recruitment and retention of talent, ensuring we create career advancement and leadership development opportunities."

## Motivated, engaged staff and good team working

- Inspectors found that staff were happy to engage with the inspection process, and some were pleased to have the opportunity to share their views. An operational manager commented, "If you hadn't asked us these questions today, I don't think anyone else would have." A focus group of intelligence managers told inspectors that they had been encouraged to be "open and honest" by their manager and that they had said the same to their staff.
- 10.6 Inspectors noted that, in general, intelligence staff were motivated, enthusiastic, and loyal. Collection officers told inspectors, "We're a very keen team here, so we'll do anything."
- 10.7 Intelligence officers, managers, and partners from other law enforcement agencies (LEAs) all told inspectors that there was good team working in Border Force teams and multi-agency hubs (MAHs). During a focus group, managers in a MAH said that "we work well as a team", "we look out for each other", and "the staff are proud of their work and contribution to keeping the border safe". Embedded staff from other LEAs said that the team worked well "often through challenging circumstances".

## **Management support**

- 10.8 Intelligence staff at all grades told inspectors that they felt supported by their managers.

  Managers were described as "great" and "phenomenal". There was praise for the head of the
  Maritime Intelligence Command, who was described as "very pastoral", "really approachable",
  and was said to have a "good relationship" with the officers.
- 10.9 While managers were seen as supportive, an intelligence manager in a focus group commented that the attention was often on the wellbeing of junior staff and that managers' own needs were sometimes overlooked by senior managers.

## **Reward and recognition**

10.10 A senior manager told inspectors that there were reward and recognition (R&R) initiatives to reward and motivate staff. Vouchers and performance awards could be requested for staff via METIS (the Home Office human resources, payroll, finance, and procurement system). There were also internal R&R events and awards ceremonies where good work and achievements were recognised. They said they had used around 17% of their budgeted R&R allocation so far this year.

#### Recruitment

10.11 According to the 'Border Force Business Plan 2022-23', which was shared with staff in May 2022, there were [redacted] staff working in intelligence, forming [redacted] of the total number of Border Force staff. In October 2022, the Home Office provided figures to inspectors showing there was a [redacted] full-time equivalent (FTE) shortfall in BFID staff, or [redacted] of the full complement. Immigration Intelligence figures showed a shortfall of [redacted] staff and an overall shortfall for Home Office Intelligence of [redacted]. Figure 20 below illustrates the data provided, with staffing figures rounded up to the nearest whole number.

## Figure 20: Staffing figures as of 1 September 2022 [Redacted].

- 10.12 The 'PIONEER Closure Dashboard' stated that "standardised job adverts have led to simplified BFID recruitment and the ability to recruit from reserve lists", but managers told inspectors that recruitment took too long. An intelligence manager told inspectors that they had tried to fill a vacancy three times without success, describing the recruitment process as "so painful". One of the reasons given for the lengthy recruitment timescales was the centralisation of recruitment into national rather than local campaigns. A senior manager said that it was harder to recruit as they were allocated staff from a national campaign rather than recruiting for specific posts themselves, "Since centralised recruitment, we are governed by them, and it takes so long."
- 10.13 Some managers told inspectors that successful candidates sometimes withdrew due to the length of time it took to offer them a start date, often because they had been offered another job in the meantime. An analyst told inspectors that analysts were recruited onto a reserve list rather than into a particular post. New recruits did not realise that they were not going straight into a job and by the time they were offered a post "they've got a job elsewhere".
- **10.14** Another reason given for delays in recruitment was the security vetting process. [Redacted].

10.15 Staff from Home Office Intelligence Analysis (HOIA) told inspectors that they had begun to recruit apprentices. The first apprentice had started that week, having been offered the job nine months previously.

## **Mentoring**

- 10.16 Managers told inspectors that once new staff were recruited, it still took time before they were fully competent in their roles. In some teams there was a programme of training and mentoring. Providing a mentor for a new member of staff meant that a short-staffed team was further depleted during the mentoring period.
- 10.17 Officers and managers in different intelligence teams said that new officers were given a three-month, one-to-one mentoring period. A senior intelligence manager said that it could be three to six months before new staff could work independently in their team.

#### Retention of staff

10.18 Border Force Intelligence Directorate managers told inspectors that staff left their roles for a variety of reasons, and it was a challenge to fill vacancies before new ones appeared. Managers told inspectors that in one team, four officers had recently been promoted. A manager said that they were "constantly training and mentoring new staff". This appeared to be a particular issue for analysts, given the level of training provided for the role.

## **Annualised hours working**

- 10.19 Intelligence managers told inspectors that there was difficulty in recruiting experienced frontline staff into intelligence roles as their annualised hours working (AHW) rate would be reduced. AHW is an attendance system in which staff are required to work a set number of hours in a year rather than in a day or week. An AHW allowance is paid over and above the standard rate of Civil Service pay. The amount paid depends on the number of weekends, public holidays, on-call hours, night hours, and flexibility required for the role.
- **10.20** Analysts said that they did not receive any AHW, so any officers moving from a frontline post would have to take a "massive" pay cut to become an analyst.
- 10.21 A senior manager told inspectors that it was a challenge to fill analyst vacancies "primarily due to money", [redacted], as other law enforcement agencies (LEAs) paid far more than Border Force. A senior analyst told inspectors that analysts in the National Crime Agency (NCA) were paid more, even at a lower grade.
- 10.22 Having recruited staff and spent time and resources on training them, analyst managers found that there was a 'brain drain' effect, as skilled staff were attracted to roles in other LEAs as they paid more. In order to try and combat this, a senior manager said that they had tried to obtain a recruitment and retention allowance (RRA) for analysts but, as this had been under consideration since 1996, "I'm not holding my breath". Another senior manager said that they wanted to retain analysts, and that RRA was being considered, but it was a Cabinet Office decision.
- **10.23** Officers from LEAs in a multi-agency hub told inspectors that Border Force and Immigration Enforcement colleagues were on different AHW rates to each other, with different weekend

- and flexibility requirements, leading to poor morale in the team. Officers in the MAH described this as the "elephant in the room" and that "no one wants to talk about it".
- **10.24** Senior managers acknowledged that there were different AHW rates between Border Force and Immigration Enforcement staff, but they pointed out that intelligence officer roles differed and that AHW was role-specific.

## **PIONEER** programme

- 10.25 Under the PIONEER programme restructure, some staff were moved into different roles. An intelligence manager told inspectors that staff in their team were told that they would have to reapply for their jobs, "Staff were crying and very upset, they were told that they would need to apply, have a paper sift and then be interviewed. In the end we had a paper sift process and no redundancies resulted."52
- 10.26 Previously, field intelligence officers (FIOs) worked in regional intelligence units, but under PIONEER, FIO work became part of the collection capability. Some of those who had previously been FIOs became development officers. Inspectors found that the restructuring had caused discontent, particularly in relation to collection and development staff.
- 10.27 Development officers told inspectors that under PIONEER, some people were moved into unsuitable roles, and it was "like putting a round peg in a square hole". An example was given of a former FIO who had built up very good relationships with stakeholders and was "broken" when his role was changed, leading him to leave the department.<sup>53</sup>
- **10.28** [Redacted].
- 10.29 As discussed further in chapter 11, collection officers in Hull, one of whom had been in post for eight months, had not received full training. Inspectors noted that they received minimal supervision as their manager was based in Teesport and visited the Hull office every three to four weeks for two days at a time. Collection officers told inspectors that there were occasions when there was no one in the office at all if their rest days coincided, though there was always a colleague on call to be able to respond to queries. When asked if there was sufficient oversight of collection officers, a senior intelligence manager said that they could go to the FIC or to the senior manager of the Unaccompanied RoRo Modal Hub (UMH) if they had any problems.
- **10.30** Development officers told inspectors that "one or two" collection officers had already left the job as they were "demoralised." A frontline manager said collection officers were fed up and that "we will lose people".

## Flexible resourcing

10.31 The 'PIONEER Closure Dashboard' provided to inspectors (produced in February 2021 shortly after the One Home Office announcement) stated that there was "now the ability and mechanisms in place to flex, not just across BFID within hubs, providing benefits in terms of

<sup>52</sup> The Home Office, in its factual accuracy response, stated that the PIONEER team had never been made aware of staff crying and being told that they needed to apply for their own jobs; "PIONEER clearly communicated at all stages of the restructure how this might impact on staff and ensured that support mechanisms were in place at all times to support staff."

<sup>53</sup> The Home Office, in its factual accuracy response, stated that it did not accept that PIONEER put anyone into a role that they were unsuitable for; "PIONEER worked with local managers to skills match all staff into their first preference. Where this was not possible, local managers worked with staff to find positive outcomes."

- efficiency and effectiveness". However, the 'PIONEER Handover Report', dated 31 March 2022, stated that the interoperability of each capability within and across modal intelligence teams remained to be tested and delivered.
- 10.32 The PIONEER vision was for targeting and development staff to be deployed flexibly across different modes, but inspectors did not find any evidence that this was happening. Targeters and developers had access to different IT systems in different modal hubs. Cerberus had not delivered some of the expected data benefits.<sup>54</sup>
- 10.33 A senior manager told inspectors that "Cerberus and training are our game changers" and that once these were in place Border Force could "then use people to work across the country. It will be invaluable to look across threat, and nationally".
- **10.34** Targeting in the UMH was described as "niche", and a senior manager said that there was "no comparison" between targeter roles across the different modes. [Redacted].
- 10.35 The collection capability sits across all modes and threats, and is structured on a geographical basis, covering south, central, north and Kent, and near Europe Border Force regions. Collection officers in Hull told inspectors that they understood that they could be used in the other geographical areas, but this had not yet happened.
- 10.36 Border Force has faced increased pressures in the last two to three years from migrant arrivals on small boats and events such as the crises in Afghanistan and Ukraine. A senior intelligence officer told inspectors that "under the [Border Force] Operating Mandate we only have [redacted] of staff we can task to border threats", but they supported the frontline when staff were available.
- 10.37 Senior managers provided inspectors with examples of intelligence staff assisting the frontline. An Urdu-speaking officer had supported the evacuation of Afghanistan, and welfare-trained officers had attended Tug Haven to assist with small boats arrivals. However, providing staff to frontline functions had not had a huge impact on the intelligence teams with whom inspectors spoke.
- 10.38 An intelligence manager told inspectors that staff were more likely to be used to support other areas of work, such as small boats arrivals, under the previous regional structure, but that it did not happen as much under the PIONEER modal hub structure. A senior intelligence manager in Hull said that "because of where we are, we don't really get called on".
- 10.39 A senior operational manager told inspectors that Border Force officers had been redeployed to cope with shortfalls of staff, but this was mainly on a voluntary basis, often as overtime or six-day working. A frontline officer said that this suited officers in the Specialist Freight Group (SFG) as they often had four or five days off in a row and were happy to work one of those days.
- 10.40 A lack of frontline training and personal safety training also prevented some intelligence staff from supporting the wider business at times of increased pressure. A senior intelligence manager said that the consequences of inexperienced staff making a mistake on the primary control point were "massive" and so they were not usually asked to work there. While this could be an advantage for the intelligence managers as they did not lose staff, inspectors noted that it meant Border Force did not have an agile workforce that could flex across Border Force functions in times of need.

## Lack of frontline skills and background knowledge

- 10.41 Inspectors found that many intelligence staff had not had any frontline training or experience. They lacked basic background knowledge of Border Force functions which would have been beneficial to their intelligence roles.<sup>55</sup>
- This lack of training and experience caused a 'credibility barrier', particularly for collection staff when engaging with frontline staff and industry stakeholders. Collection officers in Hull told inspectors that three out of four of them did not have a Border Force background, although they did have some investigative experience. A collection manager told inspectors, "Most of my guys don't have the knowledge to answer partners' questions" and they needed training in order to have the confidence to engage effectively. Development officers said that to ask someone untrained to speak to a haulier would be "hanging them out to dry", as hauliers did not have much time for Border Force.
- 10.43 A senior manager told inspectors that ideally everyone who worked for Border Force would initially work on the frontline for two years to provide a larger pool of trained, experienced officers. An officer in a frontline role said that people should never join intelligence straight away, saying that, "you need to understand the job you're doing." Targeters also said that staff benefitted from experience gained in working on the frontline.

## **Frontline staffing**

- 10.44 During the inspection, inspectors spoke to and observed staff working in frontline functions to understand how intelligence was operationalised. A senior operational manager told inspectors that there was a shortfall of around 1,000 Border Force operational staff, making it challenging to have the capability to respond to proactive operations and intelligence products. Despite this, a senior intelligence manager praised operational teams and said that they addressed the top targets, "Frontline are fantastic in how they get everything done."
- 10.45 Inspectors observed officers from the SFG at Hull and Immingham, and noted that they worked well as a team and enjoyed their work. Officers told inspectors that there was "a lot of pressure" but they were well trained, they had a close relationship with their team members, and their managers were good.
- 10.46 An SFG manager told inspectors, "We have highly motivated people who want to get promoted. We lose nearly everyone to promotion." They could not remember the last time they were fully resourced but said that it must have been more than a year previously. An SFG officer told inspectors that if officers left, it took a long time to replace them. A frontline officer told inspectors that the SFG had been created as frontline staff were not examining enough freight due to a lack of staff, but that they were also struggling now.
- **10.47** Frontline officers and managers told inspectors that their resources were also stretched. They said that they previously had four teams, each comprised of one Higher Officer and seven officers, but that staff had left and not been replaced. [Redacted].
- 10.48 One of the reasons given for the lack of staff among frontline teams was staff morale.

  A manager told inspectors that the frontline teams in the Humber ports had around ten Senior Officers (SOs) in one post over the last 15 years and that the Grade 7 role had been filled on

<sup>55</sup> The Home Office, in its factual accuracy response, stated that: "Many roles within Home Office Intelligence do not require staff to have had frontline training or to have worked at the frontline."

a temporary basis for two to three years. [Redacted]. As a result, frontline staff had become frustrated, de-skilled, and demotivated, and "four out of five" were looking for other jobs. They said that "We have a demotivated, apathetic mindset workforce."

- 10.49 [Redacted].56
- **10.50** [Redacted].
- **10.51** [Redacted].<sup>57</sup>
- **10.52** Another manager said that there was no opportunity to gather and feed intelligence back as they did not have the resources. They said they would be surprised if the entire team contributed to more than [redacted] intelligence report a month. [Redacted].
- 10.53 A frontline manager said that in the past, officers were thanked when intelligence was submitted, and they would hear the outcomes of their submissions. The introduction of the Central Operations Platform (COP) meant they no longer received feedback from intelligence teams on any of the intelligence they submitted.<sup>58</sup>

#### **MINERVA**

- 10.54 A senior manager told inspectors that the MINERVA programme to merge BFID and Immigration Intelligence under Home Office Intelligence was not focused on cost reductions, and that any efficiencies would be aimed at improving the ability to deliver against the highest-priority threats. It also offered staff professional development opportunities and more interesting and varied careers.
- 10.55 Some staff were positive about the changes and the potential for career development. An analyst told inspectors that MINERVA "opens up career possibilities". An intelligence officer told inspectors that they thought it would be an improvement as they would be working with Immigration Intelligence and doing immigration work and could get "new, interesting workstreams".
- 10.56 A senior manager told inspectors that the merger would allow staff from Border Force and Immigration Enforcement to "flex and support each other", for example, where there were limited Police National Database (PND) licences (see chapter 12 for more on this).
- 10.57 As discussed in chapter 6, officers and managers told inspectors that there was 'change fatigue' due to the multiple changes in processes over the previous two to three years, for example, due to the UK's departure from the EU and COVID-19 health measures at the border. Many staff, particularly frontline staff, continued to attend their workplaces through the strictest lockdowns. There were also changes to IT systems and business structures. The difficulties involved with introducing these changes were exacerbated by resourcing pressures. As a result, some staff were not interested in the further changes MINERVA would bring.
- **10.58** An intelligence manager told inspectors that "it's difficult to get people to interact as it's so busy at the minute and everywhere is understaffed", and that a lot of issues could be resolved by addressing shortfalls in staff.

<sup>56 [</sup>Redacted].

<sup>57 [</sup>Redacted].

<sup>58</sup> The Home Office, in its factual accuracy response, stated: "HOI is working with COP to identify technical solutions".

10.59 Inspectors found that there was uncertainty around the MINERVA end state, which caused concern for some staff. An intelligence manager told inspectors that a lot of questions regarding MINERVA were still unanswered, for example, concerns around job security, accommodation, and other personal issues which might be affected by having to change jobs. They said that there was a 'MINERVA frequently asked questions' (FAQs) document but that it had very few answers and just said that questions would be answered in time. Some officers in a focus group told inspectors that they did not feel involved in changes that had taken place. When asked if there had been any consultation with staff about the PIONEER restructure, one commented, "No. They talked as if we knew about it, and we didn't, and then it all changed." 59

## Home Office Intelligence corporate identity

- **10.60** 'An Independent Review of Border Force', undertaken by Alexander Downer and published in July 2022, made a recommendation that:
  - "Border Force should have a distinct identity and voice within the Home Office, based around their unique characteristics as a uniformed force." 60
- 10.61 Collection officers were concerned about what being a Home Office Intelligence officer meant in terms of corporate identity. An intelligence officer told inspectors, "We're Home Office Intelligence but I'm not sure if we're still Border Force." Another officer said that "it's very unclear. I have no answers to the questions I ask."
- Without a clear sense of which organisation staff represent, it was suggested that it would be more difficult to engage with other LEAs and industry partners. A senior manager commented, "What's our identity ... If we don't articulate what Home Office Intelligence is, this will be confusing to partners."

## **Conclusions**

**10.63** Figure 21 below summarises the areas that are working well in recruitment and retention and the areas that require attention.

Figure 21: Conclusions – recruitment and retention

Working well	Requires attention	
Intelligence staff are motivated	<ul> <li>There is a staff shortfall across BFID of [redacted] FTE</li> </ul>	
There is good team working	<ul> <li>Recruitment and security vetting take too long</li> </ul>	
Managers in intelligence teams are supportive	<ul> <li>There is difficulty in retaining skilled staff, particularly analysts</li> </ul>	
BFID provides support to other areas of Border Force on a voluntary basis	<ul> <li>There is disparity between BFID and Immigration Intelligence AHW allowances</li> </ul>	

<sup>59</sup> The Home Office, in its factual accuracy response, stated that: "Everyone was fully informed of the restructure through two all staff dial ins, a series of region-specific briefings that were held in conjunction with local managers and HR. All local managers were given briefing notes to share with teams and the PIONEER team were on hand to answer all questions."

60 Home Office, 'An independent review of Border Force', (published 20 July 2022), <a href="https://www.gov.uk/government/publications/independent-review-of-border-force">https://www.gov.uk/government/publications/independent-review-of-border-force</a>

Working well	Requires attention
	<ul> <li>There is confusion over the remit of collection officers</li> </ul>
	<ul> <li>The ability of BFID staff to flex across mode and threat under the PIONEER model has not been fully realised</li> </ul>
	<ul> <li>The lack of a multi-skilled workforce means Border Force lacks resource flexibility</li> </ul>
	<ul> <li>There is a frontline shortfall (1,000 FTE), resulting in a reduced ability to action and feed back to intelligence</li> </ul>
	<ul> <li>There is uncertainty over the impact of MINERVA on staff</li> </ul>

#### **Conclusions**

Intelligence staff are generally motivated, enthusiastic, and loyal. They are keen to do a good job and to learn and improve. Managers are supportive.

Recruitment takes too long and is inefficient. New recruits are lost due to the length of time taken to onboard staff.

Retention of skilled staff is hindered by competition from frontline roles and other LEAs offering higher pay, AHW rates, and a lack of RRA.

Collection officers in the Humber ports are largely untrained and unsupervised and receive very few taskings. There is uncertainty around responsibility for engagement with stakeholders, which is leading to frustration for collection and development officers.

Benefits of the PIONEER model to flex staff across BFID have not yet been realised, partly due to delays in data and reliance on different IT systems for access to data across different modes.

Intelligence staff are being used to support other areas of the business on a voluntary basis, providing experience and professional development opportunities, but it is not greatly impacting on intelligence functions.

A lack of frontline training for intelligence staff makes it harder for BFID to support frontline functions and for Border Force to deploy its resources in the most efficient manner.

Frontline resources are stretched, and it is not always possible to action intelligence due to mandatory operational requirements. Some frontline staff are demotivated and de-skilled, potentially causing further staff retention issues. Intelligence gathering and feedback opportunities are being lost.

MINERVA was seen as a positive step, opening up new opportunities for some staff. However, other staff have unanswered questions about the impact of the transition to Home Office Intelligence and what it means for their roles and their identity as intelligence officers.

## 11. Inspection findings: training and accreditation

- 11.1 The ICIBI's 'expectations' state that anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary should be fully competent. The expectations also state that everyone should receive the training they need for their current role and for professional development, and regular feedback on their performance.
- In the '2025 UK Border Strategy', published in December 2020,<sup>61</sup> the government set out its ambitions to improve and standardise border infrastructure and facilities with greater levels of automation for passengers and goods. As part of its ambition, the strategy set out six priorities, including to, "Build the capability of staff and the border industry responsible for delivering border processes, particularly in an environment of greater automation; and simplify communication with border users to improve their experience." The strategy also aims to, "Improve the agility and expertise of frontline staff to improve border efficiency."
- 11.3 Part of the PIONEER programme vision was to invest in people through training, resources, and recruitment, ensuring the right people with the right skills filled the right posts. Following on from this, under the MINERVA programme, Home Office Intelligence set out its objective to, "Create a diverse, highly skilled workforce where our people are motivated, engaged and empowered to fulfil their potential." It aimed to create clear roles and 'development pathways' within each team, along with "training plans to ensure staff have the expertise to perform their roles".
- 11.4 A job advertisement for Borders and Enforcement intelligence officers in July 2022 set out the benefits of the role, including training and opportunities to build on existing skills, work-based coaching and mentoring, learning and development tailored to the role, and a guaranteed five days of learning per year.

## **Intelligence Foundation Course**

- 11.5 As part of the induction programme for Border Force Intelligence, newly appointed officers are required to complete the 'Intelligence Foundation Course'. The course consists of a:
  - pre-trainer-led event workbook undertaken through self-supported study
  - two-day trainer-led event covering skills products, delivered remotely and flexibly over Microsoft Teams
- **11.6** [Redacted].
- 11.7 The training is followed by a 'Modular Programme of Enhanced Learning' (MPEL), which consists of a suite of products designed to be delivered locally by either local learning officers or associate trainers. The MPEL covers:

- 'Write to Share' development part 1 and 2
- [Redacted]
- 'Tactical Management of Risk in Law Enforcement' (MoRiLE)
- 'Collection Fundamentals' part 1 and 2
- [Redacted]

## **Intelligence Professionalisation Programme**

- 11.8 Prior to the MINERVA transformation programme, Border Force and Immigration Enforcement had introduced the Intelligence Professionalisation Programme (IPP). The programme, accredited by the College of Policing, provides the learning and development needs for a wide range of intelligence functions, and provides learners with a knowledge of the collection, management, analysis, and use of intelligence. The College of Policing describes IPP as a development programme that is between 12 to 18 months long, consisting of a national learning curriculum and a set of minimum standards of competence (assessment criteria).<sup>62</sup>
- 11.9 An undated 'Home Office Intelligence Capability Team' presentation set out the priorities for 2022-23. The team, which is not part of the MINERVA programme team, was formed in March 2022 in line with the creation of Home Office Intelligence. The priorities included the development of learning pathways and specialist training, along with the professionalisation of the workforce through the IPP. The presentation identified several key risks, including, "Trainers not being released and a lack of resources for key learning activity." Mitigations included the early publication of delivery plans, technological advancements to limit trainer delivery time, trainer numbers being continually assessed, and where learning could not be resourced, the reprioritisation of learning activity.
- 11.10 The plan set out to improve the IPP completion rates in Immigration Intelligence while reinvigorating it for Border Force officers. It intended to map applicable roles under the target operating model, increase portfolio submission rates, and revise the 'Introduction to IPP Learning & Development' module to become a self-learning product.
- 11.11 The Home Office provided inspectors with data which showed that out of [redacted] Border Force intelligence staff, only [redacted] Border Force officers ([redacted]) held IPP accreditation in May 2022. This included [redacted] intelligence officers, [redacted] analysts, [redacted] managers, [redacted] senior manager and [redacted] director. In the Humber ports region, only [redacted] officers ([redacted]) held IPP accreditation, out of a total of [redacted] intelligence staff. Collection officers told inspectors that they were yet to complete the IPP accreditation.
- 11.12 Following the creation of Home Office Intelligence, staff in some units told inspectors that they were unsure as to whether they were still expected to complete IPP accreditation and that they needed more direction. Managers told inspectors about the "foot being taken off the gas" with regards to IPP accreditation. They were also unsure about future plans for IPP, with one saying that it could be replaced at some date in the future. Senior managers also lacked clarification on the direction of IPP, saying that it had "dropped off the radar".
- **11.13** Managers in the Gateway Multi-Agency Hub said that the National Crime Agency IPP framework was "much better" as it was well structured and resourced accordingly. They said that Border Force did not have a central training team, and there was no structure or

<sup>62</sup> College of Policing, 'Intelligence officer – a day in the life', (published 30 July 2021), <a href="https://www.college.police.uk/career-learning/career-development/career-pathways/intelligence/day-life-intelligence-officer">https://www.college.police.uk/career-learning/career-development/career-pathways/intelligence/day-life-intelligence-officer</a>

momentum concerning training. The head of the Gateway MAH raised concerns about the quality of IPP. They said that officers who had attended the 'Intelligence Foundation Course' could sign off 70% of the IPP "even if you've never worked as an intelligence officer". They went on to state that they liked the concept that all intelligence officers should be trained to the same level but were unclear as to whether the current IPP programme in Border Force achieved this.

- 11.14 Staff from two law enforcement agencies (LEAs) embedded in the Gateway MAH told inspectors how they achieved IPP accreditation. They completed a two-year pathway including 'National Operational Standards', [redacted], along with other substantial training, including a week's training on the intelligence cycle. They believed that Border Force officers completed IPP to "a lower level" and that Border Force had lost its investigative abilities and had little or no training. There was a feeling that Border Force needed to invest in training for their officers to bring them up to a similar standard to other LEAs.
- 11.15 This perception was disputed by senior managers in Border Force intelligence. They were part of the governance board for IPP and compared the quality of IPP accreditation across organisations. In contrast to the views expressed, they had heard concerns about the quality of delivery on the policing side. But they also acknowledged that accreditation in Border Force had gone "by the wayside". They wanted officers to be accredited and, to demonstrate the importance they placed on it, they were completing the accreditation themselves.
- 11.16 Uncertainty about the future of IPP by Border Force officers and managers, and its perceived value, will undoubtedly affect officers' motivation and willingness to undertake accreditation. This is further compounded by managers' uncertainty around IPP and limited resources, meaning officers have little ability or time to undertake IPP. Clear expectations around IPP need to be set, with officers afforded the time to complete the accreditation in a meaningful manner.

## **Role/mode-specific training: Collection**

- 11.17 The 'Border Force Collection Strategy 2021', an internal document, sets out its ambition for the new collection officer role as having, "A professionally skilled Field Intelligence Officer (FIO) Collection network, strategically deployed and located on the basis of threat and intelligence gap requirements."
- 11.18 A collection manager said that collection staff in Hull, some in post for up to eight months, had completed the standard two-day 'Intelligence Foundation Course' but had not received all the training required for their collection role. Another admitted that new staff did not receive all the required training and had to be upskilled and mentored on the job. In the absence of formal training, collection staff in Hull said they relied on more experienced officers to learn the role. They had yet to undertake the training required, which was mainly due to a lack of available courses. Three of the four collection officers in Hull were unwarranted and unsure of their powers. Similarly, three were unable to create intelligence reports on the Single Intelligence Platform (SIP) as they had not had the required training to do so.
- 11.19 A senior manager told inspectors that the foundation course for collection officers had just been compiled and had been "hamstrung by colleagues in training and capability" and their ability to compile an appropriate training course specific to collection officers. Another

<sup>63</sup> The Home Office, in its factual accuracy response, stated "...[the] intelligence foundation course and training no longer counts towards IPP accreditation."

- manager said that two collection officers were due to complete their pre-learning on the day they were interviewed by inspectors, but this had not gone ahead as they had received some 'hot tasking'.
- 11.20 Similar feedback was received from stakeholders, with one noting that the collection officers at the Humber ports were hard working but a "relatively new team" who were still in training. This resulted in them "...not being as active in collecting intelligence as it was hoped they would eventually be".
- 11.21 One positive development was that one collection officer had completed an [redacted] training course. The Home Office described the course as:
  - "A four-day training event delivered face to face through external training providers who are specialists in their field. [Redacted]. The course is immersive and consists of several role plays."
- 11.22 The course was described as being "novel" for Border Force. [Redacted] delivered it, and feedback from the officer was positive. They said it was, "a difficult course but really good". [Redacted]. [Redacted] training was planned for September or October 2022.

## Forward Intelligence Cell

11.23 Staff in the Forward Intelligence Cell (FIC) told inspectors that their 'Intelligence Foundation Course' training consisted of a workbook that they had a week to complete before a two-day training session delivered online. They felt this way of training was insufficient for the role. This was echoed by FIC managers, who described the training as, "rubbish when compared to other agencies or law enforcement agencies".<sup>64</sup>

## **Development**

11.24 Staff in the Unaccompanied RoRo Modal Hub (UMH) development team told inspectors that the two-day intelligence foundation course was inadequate and that they lacked any training pathway. They said the course was "wrong" and described the knowledge checks as inadequate, with people "falling asleep on the course".65

## **Targeting**

- 11.25 Managers told inspectors that there was no specific training course for targeting officers. [Redacted].<sup>66</sup> A senior manager told inspectors that targeters needed to understand how the Home Office and IT systems worked and that general targeting training would not be of much benefit due to the differences between modes.
- 11.26 Managers said that training requirements lacked structure and that intelligence officers had not received any immigration or customs training because they were not considered to be frontline staff. Three managers had received IPP accreditation, but this had expired, and they felt "there was no real drive to continue".

<sup>64</sup> The Home Office, in its factual accuracy response, stated that: "Senior managers held that these comments do not reflect the overall positive feedback for the course."

<sup>65</sup> A knowledge check is an opportunity for instructors, teachers, trainers, and facilitators to check and determine if learners understand and are able to apply the content that is presented to them.

## **Analysis**

11.27 In contrast, the training and accreditation provision for analytical staff (who had already merged from Border Force Intelligence and Immigration Intelligence under the MINVERA programme) was clear, bespoke, and readily available. Inspectors were told that staff completed a core skills training course, introduction to intelligence analysis, and government intelligence training. One analyst said they were completing a new analyst training programme under the 'Professional Head of Intelligence Analysis' (PHIA), which they felt was better than the previous offering. Another had completed a master's course at King's College London, and had been given study leave to do so. Senior Officers said that the training provided was "always improving". Another said, "The training is good, and there is investment in the staff as well." They were also aware of the course at King's College and said that the funding was available if they wished to complete the course.

#### **Conclusions**

- 11.28 Both managers and staff spoke about limited resourcing affecting officers' ability to undertake meaningful training, stating, "We don't have the capacity to train everyone and deliver what we need to at the same time." This was exacerbated by resourcing pressures, which meant staff could not be released to undertake the training.
- 11.29 The head of Maritime Intelligence Command acknowledged that the training provision could be better and that it had not met the promises and commitments made. They said the Training and Capabilities team had too much to do and recognised the need for better training. Training needed to be improved to deliver staff who were confident in intelligence functions, such as the 'Criminal Procedure and Investigations Act' (CPIA), intelligence disclosure and for their skills to be recognised by intelligence partners.
- **11.30** Figure 22 below summarises the areas that are working well in training and accreditation and those that require attention.

Figure 22: Conclusions – training and accreditation

Working well	Requires attention
<ul> <li>Training for analysts was considered to be good</li> </ul>	<ul> <li>Delays to delivery of training, including the availability of trainers and difficulty in releasing staff to attend training</li> </ul>
<ul> <li>[Redacted] training was viewed positively</li> </ul>	<ul> <li>Review the training pathways currently in place</li> </ul>
	<ul> <li>IPP accreditation appears to have stalled, with a lack of clarity over its future and concerns about the quality of delivery compared to that of partners</li> </ul>

#### **Conclusions**

Training expectations and delivery were inconsistent, with a lack of available training courses compounded by staff availability. There had been a failure to provide sufficient training to new and existing staff, with no clear pathway for the continuous training and professionalisation of staff.

More clarity is needed for staff on the importance placed on achieving IPP accreditation, with senior managers leading by example. A benchmarking exercise should be carried out to ensure consistency of IPP accreditation across Home Office Intelligence and other LEAs.

## 12. Inspection findings: tools

- One of the ICIBI's 'expectations' is that "Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully."
- 12.2 In the '2025 UK Border Strategy', the government stated its ambition of, "harnessing the power of technology and innovation to improve delivery of the border. From advanced detection technologies to identify threats, to new technologies for tracking the movements of goods, technology has the ability to improve almost all border processes."<sup>67</sup>

## **IT systems**

12.3 Home Office Intelligence staff work across numerous IT systems, some owned by the Home Office and others by other government agencies, such as His Majesty's Revenue & Customs (HMRC) and the Police. The most commonly used systems are listed in figure 23 below.

Figure 23: Systems used by Home Office Intelligence [Redacted].<sup>68</sup>

#### **Police National Database**

- **12.4** Border Force National Intelligence Hub (BFNIH) officers conduct checks on the Police National Database (PND) on behalf of the modal hubs, collection teams, and Border Force National Safeguarding and Modern Slavery (SAMS) team officers.
- 12.5 Higher Officers in the BFNIH told inspectors that staff needed a licence to access systems like the PND, but they only had [redacted] licences. Officers with access to PND also required additional training. A manager from BFNIH told inspectors that, until recently, they were conducting PND checks for collection officers, and with volumes increasing, this had started to cause issues. As a result, [redacted] licences were relinquished from the Home Office Intelligence pool, so that the collection function could complete its own PND checks. As there were times when only one PND officer was on shift, BFNIH worked closely with Immigration Intelligence to share PND resources.
- 12.6 The 'Border Force's Risk Register for 2022-23', an internal document, dated May 2022, included a risk about the PND, saying, "There is a risk that the BFNIH does not possess enough PND trained staff to process all the PND requests it receives in an accurate and timely fashion on a 24/7 basis."
- **12.7** To mitigate this risk, the Home Office Intelligence Capability Team set out in its priorities for 2022-23 to:

<sup>67</sup> Cabinet Office, `2025 UK Border Strategy', (published December 2020), <a href="https://www.gov.uk/government/publications/2025-uk-border-strategy">https://www.gov.uk/government/publications/2025-uk-border-strategy</a> [Redacted].

- "Bolster PNC trainer cadre for Home Office Intelligence ([redacted] trainers in process of being trained by College of Policing).
- Arrange and deliver in-house PNC courses within the Directorate (already in progress) in response to demand.
- Work collaboratively with the Change Team and relevant MINERVA Project leads on PND licence allocation to identify demand for future courses and support the build of a HO Intel PND Bureau.
- Maintain PND accreditation through training delivery and guidance.
- Specialist PND courses such as Flagging will continue to be procured through College of Policing and/or Police Forces."
- 12.8 A senior intelligence manager acknowledged to inspectors that Border Force officers lacked PND licences. They did not propose that every officer should hold one, but licences should be allocated appropriately where required. They acknowledged that some units lacked enough licences, especially considering the fact that all intelligence packages now needed to be checked against the PND.

#### **Central Operations Platform**

- 12.9 The Central Operations Platform (COP) contains an intelligence workflow system that was launched in January 2021. It was intended to ensure that intelligence teams had timely access to the required intelligence, gathering data to assist in the analysis of operations as part of the intelligence cycle. COP aims to deliver a fully joined-up feedback loop, where events at the frontline, including target outcomes, are fed back into the intelligence picture to inform future target generation. All frontline referrals are routed to the BFNIH, with referrals generated by intelligence teams being routed back to them to enhance and forward as appropriate. Results are then fed back into COP.
- **12.10** This was in line with a recommendation made in the ICIBI's freight operations report in 2013:<sup>69</sup>
  - "6. Develops an effective and consistent feedback process to ensure that intelligence is collected from frontline freight examination staff and passed to targeting teams to improve future targeting."
- 12.11 The 'Border Force's Risk Register' from May 2022 identified that the delivery of COP was a risk, noting that the COP implementation team had failed to deliver as planned. It said that COP had been delivered to some areas, namely BFNIH, and in the next steps it would be delivered to the rest of Border Force Intelligence in June 2022. It noted that long-term confidence in COP was low, with strained relationships between BFNIH and the COP implementation team.
- 12.12 Staff in BFNIH told inspectors that they received information from frontline staff via COP. They described COP as a difficult system to navigate, with issues when progressing through the system, and said it was a "time-consuming" system to use. They questioned whether COP even met the standards of a 'minimal viable product', with some teams refusing to use it. In several focus groups, officers raised the issue of having to double-key information into COP, the 'Intelligence Repository', and the Access database.<sup>70,71</sup>

<sup>69</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of Border Force freight operations March 2013 - July 2013', (published 21 November 2013), <a href="https://www.gov.uk/government/publications/inspection-report-of-border-force-freight-operations-november-2013">https://www.gov.uk/government/publications/inspection-report-of-border-force-freight-operations-november-2013</a>

<sup>70 &#</sup>x27;Double keying' is the term used when staff have to enter data twice, often onto more than one IT system.

<sup>71</sup> The Access database was an internal database used by Border Force to record and store information.

- 12.13 A BFNIH manager told inspectors that COP did not do what was required, describing the system as "clunky". They said it now took longer to input data and information. They described their previous Access database as being simpler and better than COP, and described COP as not being "fit for purpose". They said they had reported issues with it but felt "exhausted" with the system.
- 12.14 They also told inspectors that they would chase a target outcome from frontline staff if it had not been entered onto COP, or would check IT systems to see whether an interdiction had occurred and feed the information back to partners. A barrier to this was that COP was not joined up with other systems, making it a time-consuming process.
- 12.15 Managers in the Command and Control Unit (CCU), part of the BFID Strategic Centre, also held similar views. They described it to inspectors as being "worse" than their previous database, and said its implementation was a "kick in the teeth". They added that they were fortunate not to be using COP daily, as it was a step backwards compared to the previous system.
- 12.16 Senior managers in the CCU also felt that COP could be improved in relation to management information and performance reporting, again describing the old Access database as being more user friendly, and said that COP had failed to deliver the functionality they expected. They also confirmed that the only other team using COP was the People Hub, with different teams pausing its use.<sup>72</sup> They said that any improvements they highlighted were slow to be delivered.<sup>73</sup>
- 12.17 A manager in BFNIH and CCU described COP as "not really working". They had experienced issues when attempting to run management information reports from it, saying that "COP cannot run MI off properly". They told inspectors they were working with several teams to improve this, with further rollout paused pending resolution of these issues. They also described their frustrations when they trialled COP. They had worked with consultants and told them what needed to change, but the changes were not delivered.<sup>74</sup>
- 12.18 Frontline staff told inspectors that the length of time it took to complete an entry on COP meant that only positive interdictions were being added to the system, and they did not have the resources to enter all of the negative interdictions. Border Force officers in the Forward Intelligence Cell (FIC) in Hull told inspectors of their concerns about COP. They described it as a tool for intelligence flow from frontline officers, but felt it was "laborious", with it taking an unknown amount of time to complete and officers having to complete "page after page" on the system. A senior manager in the FIC said that since its introduction, the number of intelligence reports had reduced. They described COP as making inputting intelligence "ten times harder", with officers not inputting intelligence into the system for this reason.
- 12.19 Officers in the RoRo Development Team also described COP as "not working" as it was too cumbersome. A manager questioned whether frontline officers would refer intelligence via COP due to its complexity, stating that they received very few intelligence referrals via COP.
- 12.20 Officers from the Specialist Freight Group (SFG) described COP as "horrendous", explaining that they had to "scroll through all the fields to progress through it". They said it was very "long winded" and that sending an email was much more straightforward. They described an occasion when they were inputting data onto COP but the system "kept throwing them

<sup>72</sup> The People Hub focuses on individuals entering and leaving the UK committing cross border crime.

<sup>73</sup> The Home Office, in its factual accuracy response, stated: "Accompanied RoRo Modal Hub has paused use of the system [COP] due to the double keying issues."

<sup>74</sup> The Home Office, in its factual accuracy response, stated that "...not all the changes were delivered due to the departure of the original consultant and the fact that their replacement had no corporate/business knowledge."

- out". This meant that they had not completed the report on COP. Higher Officers said it took 90 minutes to input two records onto COP and that the time involved was a "problem".
- 12.21 As set out in the ICIBI's 'expectations', "Individuals and teams [should] have the tools, support and leadership they need to perform efficiently, effectively and lawfully". To encourage the constant feed of intelligence, IT systems should enable, and not deter, the provision of feedback. COP does not currently deliver this. A review of the effectiveness and efficiency of COP should be carried out, with a user-centred design that includes input from users to identify and address the issues.

#### Cerberus

- **12.22** Cerberus is described by Border Force as an advanced, highly capable analytics and targeting system. The Home Office told inspectors that, "Cerberus will enable the analysis of a wider range of datasets within a single system."
- **12.23** [Redacted].
- **12.24** [Redacted].

## **Safety and Security Declaration**

- 12.25 In the '2025 UK Border Strategy', the Home Office set out six transformation strategies, including, "Use upstream compliance to move processes away from the actual frontier where appropriate, both for passengers and traders." <sup>75</sup>
- 12.26 The Safety and Security Declaration (SSD) contributed to this strategy and was one such dataset that would feed into Cerberus. As the UK is no longer part of the safety and security zone in the EU, the government introduced SSD regulations mandating pre-arrival and pre-departure information for all consignments entering and leaving the UK.<sup>76</sup>
- **12.27** [Redacted].
- **12.28** [Redacted].
- **12.29** [Redacted].
- 12.30 The Director of Border Force Intelligence acknowledged the delay to SSD from the EU and goods transiting the EU, and said a "waiver" to the introduction of the SSD was in place until the summer of 2023. In addition to this, HMRC's preferred option for submission was through a 'UK Single Trade Window', which was not anticipated to be delivered until at least 2024. [Redacted].

## **Equipment**

12.31 The focus of this inspection was intelligence. However, inspectors also looked at how officers operationalised intelligence on the frontline, the resources available to action intelligence, and any intelligence feedback loops. To do this, frontline staff need the tools and means to search consignments efficiently and effectively.

<sup>75</sup> Cabinet Office, '2025 UK Border Strategy', p.8.

<sup>76</sup> HM Revenue & Customs, 'Guidance: Safety and security requirements on imports and exports', (published 8 July 2022), <a href="https://www.gov.uk/guidance/safety-and-security-requirements-on-imports-and-exports">https://www.gov.uk/guidance/safety-and-security-requirements-on-imports-and-exports</a>

- 12.32 In the '2025 UK Border Strategy', the government set out its strategy to, "work with ports who operate a roll-on roll-off model to explore how technology can be used to protect the critical flow of goods at these locations, while delivering the wider outcomes we wish to deliver through this strategy".<sup>77</sup>
- 12.33 Inspectors observed two frontline operational teams frontline operational staff at Immingham and the Specialist Freight Group (SFG) at Hull in order to understand how intelligence was operationalised, and what equipment was available to search consignments for which officers had received intelligence-led targets.

#### [Redacted]

- **12.34** [Redacted].
- **12.35** [Redacted].
- **12.36** [Redacted].

#### Dog teams

**12.37** [Redacted].

#### **Freight scanners**

- **12.38** [Redacted].
- **12.39** [Redacted].
- **12.40** [Redacted].
- **12.41** [Redacted].
- **12.42** [Redacted].
- **12.43** [Redacted].
- 12.44 The ICIBI's inspection of Border Force operations at east coast ports in 2016 examined search technology and equipment, including scanners. Similar issues were raised around the availability of scanners, and inspectors considered that they had not been suitably addressed in the Humber ports.

#### **Refrigerated facilities**

- **12.45** [Redacted].
- **12.46** [Redacted].

#### Figure 24: Conclusions – tools

[Redacted].

<sup>77</sup> Cabinet Office, '2025 UK Border Strategy', p.48.

<sup>78</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of Border Force operations at east coast seaports' (published 12 July 2017), <a href="https://www.gov.uk/government/publications/inspection-report-on-border-force-operations-at-east-coast-seaports-july-2017">https://www.gov.uk/government/publications/inspection-report-on-border-force-operations-at-east-coast-seaports-july-2017</a>

# 13. Inspection findings: performance management and assurance

Plans (ODPs) which set out the priority outcomes and strategic enablers for each government department. Border Force has a role in delivering on all four of the ODPs. As covered in chapter 8, Border Force creates the 'Control Strategy' by working in conjunction with partner agencies to assess threats at the border and identifying the priority level for each threat.

## **Revenue protection**

- The Financial Secretary to HM Treasury sends a formal letter to the Director General of Border Force on an annual basis, setting the remit for Border Force customs revenue work, including illicit alcohol and tobacco, intellectual property rights (IPR), and strategic exports. 80 The Home Office told inspectors that these revenue protection targets were reviewed and set annually in consultation with His Majesty's Revenue & Customs (HMRC), Border Force, and the Home Office, taking account of "government priorities and new and existing activities at the border". The targets can be amended to take into account external factors, such as increased passenger numbers in the summer months, that may impact on Border Force's ability to achieve them.
- 13.3 Border Force said that it had "a strong, positive record of delivery across the range of its customs revenue obligations, and has met its total revenue loss prevented target over the last four years". Performance against targets was measured "using a variety of Border Force and HMRC methods and systems", but information on the methods and systems was not provided. A 'Partnership Committee' meets at least quarterly to review performance.

## **Tobacco and alcohol**

13.4 Figure 25 lists the revenue protection targets for tobacco and alcohol for the financial years 2019-20 to 2022-23 and the amounts protected. The target for the prevention of loss of revenue from illicit cigarettes, hand-rolling, and raw tobacco has fluctuated over this period, but the Home Office did not provide an explanation for this fluctuation. The target for high-risk alcohol consignments has remained the same for the previous four years.

<sup>79</sup> The four Outcome Delivery Plans are: 1. Reduce crime; 2. Reduce the risk from terrorism to the UK and UK interests overseas; 3. Enable the legitimate movement of people and goods to support economic prosperity; 4. Tackle illegal migration, remove those with no right to be here and protect the vulnerable.

<sup>80</sup> Strategic exports are defined in the annex to the letter from the Financial Secretary to HM Treasury to the Director General of Border Force of 18 May 2022 as "the illegal or uncontrolled export of goods, materials, services and technologies that may support the illegal development of nuclear, biological, and chemical weapons, and their means of delivery".

Figure 25: Customs revenue protection targets and revenue protected for Border Force (cigarettes and tobacco, and alcohol – rounded to the nearest integer)

Commodity		2019-20	2020-21	2021-22	2022-23*
Illicit cigarettes,	Target	£252m	£258m	£244m	£252m
hand-rolling, and raw tobacco	Revenue protected**	£232m	£231m	£494m	£274m
High rick alcahal	Target	£40m	£40m	£40m	£40m
High-risk alcohol consignments	Revenue protected**	£115m	£118m	£84m	£50m

<sup>\*</sup>Q1 to Q3 of 2022-23 only

- 13.5 Data on tax revenue protected through detecting goods where excise duty has not been declared is published in the Border Force transparency data on GOV.UK.<sup>81</sup> This shows that Border Force failed to meet its revenue protection target for cigarettes and tobacco in 2019-20 and 2020-21, but significantly exceeded it in 2021-22. At the end of Q3 2022-23, it had already exceeded the target for that year.
- 13.6 For high-risk alcohol consignments, Border Force significantly exceeded the target for revenue protected in each year. In 2020-21, the amount protected almost exceeded the target by three times. Inspectors therefore considered that the target for high-risk alcohol consignments was too low and should be increased, given Border Force's performance in this area.
- **13.7** The unpublished 'Border Force Intelligence Function Review' of 2019 noted that, "The number of cigarettes seized, while easy to measure and a visible sign of success, was considered a meaningless measure of operational impact."
- 13.8 An HMRC manager told inspectors that there was no formal sanction, such as a funding cut, if Border Force did not hit the revenue protection targets. If they were repeatedly missed, there was an expectation that HM Treasury would raise the issue directly with Border Force to understand the reasons why. They also said that the data they received from Border Force on seizures was "not always up to date". In terms of improvements on how performance was measured, they wanted to go "above and beyond" the revenue protection targets and said they were "trying to get some KPIs [key performance indicators] at the border" with Border Force. They wanted to understand how many consignments were stopped, whether the stops were intelligence-led, and how they arrived at a target. The introduction of KPIs would help with this and identify whether they needed to share more intelligence in a particular area.

## Intellectual property rights and strategic exports

13.9 Figure 26 summarises the customs requirements for Border Force for intellectual property rights (IPR) and strategic exports. While no targets were set for Border Force for IPR or strategic exports in 2019-20, they were set for 2020-21 and increased over the following years.

<sup>\*\*</sup>Figures are for cigarettes and hand-rolling tobacco only and do not include raw tobacco

## Figure 26: Customs requirements for Border Force (intellectual property rights (IPR) and strategic exports)

[Redacted].

- 13.10 No data on Border Force's performance against these targets was provided but, in documents provided to inspectors, it was clear that Border Force did not consider the IPR targets set for 2021-22 and 2022-23 to be achievable. In HM Treasury's 'Border Requirements' document for 2021-22, there was a requirement for a review to be carried out to:
  - "Understand what an achievable measure looks like for 2021/22;
  - Understand what the operational blockers are to reaching the policy requirement; and
  - Lay out a plan for addressing these blockers."
- 13.11 It is not clear whether this review was carried out, but the [redacted]. The 'Border Requirements' document for 2022-23 suggests there was some tension over the target, as it states:

"[Redacted], however, as this target is deemed to be the minimum requirement necessary, HMRC will measure out-turn against the minimum requirement, and review this on a quarterly basis."

- **13.12** [Redacted].
- **13.13** Figure 27 details the quantities of drugs seized by class from 2019-20 to 2021-22.

Figure 27: Quantities of drugs seized by class

Class of drug	Unit of measurement	2019-20	2020-21	2021-22
	Kilograms	11,629.82	14,811.20	20,391.41
А	Units	92,118	272,828	505,393
	Litres	29.84	37.40	1,105.82
	Kilograms	24,898.07	16,399.26	25,120.86
В	Units	135,222	57,813	241,218
	Litres	1,664.10	250.57	1,174.80
	Kilograms	52,681.54	53,540.79	46,291.30
С	Units	4,120,829	4,786,854	7,054,160
	Litres	418.69	879.28	3,927.07

13.14 The figures show that seizures of class A drugs increased by weight and unit over this period. Class B drugs seizures decreased in 2020-21 but increased in 2021-22. Seizures of class C drugs decreased in weight in 2021-22 but increased in terms of units and volume over the same period. Border Force did not provide inspectors with an explanation for these variations but did say that there had been some changes in the classification of some drugs over this period.

## **Staff performance targets**

- 13.15 Only one team of Border Force Intelligence officers told inspectors that they had a specific target in their performance goals, which was to identify one seizure per year. No other Border Force Intelligence Directorate (BFID) teams interviewed by inspectors had any formal targets. Some teams had internally set targets that they would "increase the intelligence flows and interdictions", and others provided statistics or management information (MI) on the number of 'jobs' or 'outputs' they had completed in a month. A manager in the Forward Intelligence Cell (FIC) at Hull told inspectors that the FIC did not have targets as they did not "want to be compared" to the multi-agency hub in Folkestone.
- **13.16** When discussing targets, and in particular numerical targets, staff noted that they had previously been detrimental, with one manager stating:
  - "In the past we had targets for the number of intel reports our teams would make and the intel system just filled up with rubbish reports, it did water down the quality a lot...."
- 13.17 Intelligence staff said that simple numerical targets led to a focus on the number rather than quality of targets. There was an understanding from senior managers that Border Force needed to be more sophisticated when looking at the quality and impact of the seizures and at outcomes rather than outputs. Analysis of the impact of a seizure in terms of its purity or price is analysed by central Home Office rather than Border Force.
- 13.18 Without staff performance targets it is difficult for managers to monitor the performance of their teams, to identify which units are performing well, and to identify high-performing members of staff in their respective units. Inspectors were made aware that there were discussions ongoing around the introduction of targets, but these plans were in their infancy.

## **Targeting data and volumes**

- **13.19** Inspectors were provided with targeting data for accompanied and unaccompanied Roll-on Roll-off (RoRo) freight. Data was collected in different ways for each, so it was not possible to directly compare the two categories of freight.
- **13.20** [Redacted].

## **Accompanied Roll-on Roll-off data**

- 13.21 [Redacted].82
- 13.22 In a narrative explanation, Border Force told inspectors that the data provided for accompanied RoRo was taken from a combination of IT systems. The data was indicative only, as it was subject to change as operational databases and local spreadsheets were updated, assured, and amended. Due to the way the data was held on systems, the positive outcomes data and Selector Based Target and Border Suspect Messages data included both inbound and outbound data, and it was not possible to separate the two.
- 13.23 Over this period, a total of [redacted] accompanied freight traffic units entered (inbound) and [redacted] left (outbound) the UK. [Redacted] entered and [redacted] left via the Humber ports.

## [Redacted]

- **13.24** [Redacted].
- **13.25** [Redacted].

#### [Redacted]

**13.26** [Redacted].

#### Figure 28: [Redacted]

[Redacted].

**13.27** [Redacted].

#### Figure 29: [Redacted]

[Redacted].

#### [Redacted]

**13.28** [Redacted].

#### Figure 30: [Redacted]

[Redacted].

**13.29** [Redacted].

#### Figure 31: [Redacted]

[Redacted]

**13.30** [Redacted].

## [Redacted]

**13.31** [Redacted].

#### Figure 32: [Redacted] 83

[Redacted].

- **13.32** [Redacted].
- **13.33** [Redacted].
- **13.34** [Redacted].

#### Figure 33: [Redacted]

[Redacted].

#### Figure 34: [Redacted]

[Redacted].

#### [Redacted]

**13.35** [Redacted].

#### [Redacted]

**13.36** [Redacted].84

#### [Redacted]

- **13.37** [Redacted].
- **13.38** [Redacted].
- **13.39** [Redacted].85

#### **Unactioned targets**

**13.40** The 'Independent Review of Border Force', undertaken by Alexander Downer and published in July 2022, stated:

"To manage staff shortages at particularly busy times, Border Force send staff from all over the UK to manage shortages at Heathrow and ports in the South-East of the country, taking staff away from their home ports, reducing resilience at those ports and the ability to perform discretionary but important work that the public expect from Border Force such as customs checks in passenger channels at airports."

- **13.41** Staff shortages and moving staff to cover mandated tasks affects the ability of frontline officers to respond to targets issued by Border Force Intelligence. [Redacted].
- **13.42** [Redacted].
- **13.43** [Redacted].
- **13.44** [Redacted].
- **13.45** [Redacted].

## [Redacted]

- **13.46** One of the ICIBI's 'expectations' is that decisions and actions are right first time, and that decisions or actions are evidence-based or intelligence-led.
- **13.47** Border Force Intelligence Directorate's (BFID's) 'Strategy Document' from December 2021 acknowledged that the operational success of targeting teams rested partly on investment

<sup>84 [</sup>Redacted].

<sup>85 [</sup>Redacted].

<sup>86</sup> Home Office, 'An independent review of Border Force', (published 20 July 2022), <a href="https://www.gov.uk/government/publications/independent-review-of-border-force">https://www.gov.uk/government/publications/independent-review-of-border-force</a>

in legislation and that robust legislation improved capability. [Redacted]. The 'Independent Review of Border Force', undertaken by Alexander Downer and published in July 2022, stated:

"Data will continue to become an increasingly important asset to Border Force under the strategy, especially for freight where realising the full benefits of the future model are dependent on acquiring accurate and timely pre-arrival data. This will require full integration of both the Home Office's immigration systems and those of the other systems which Border Force serves, such as HMRC data on goods, as well as access to industry data ... The UK has relatively limited access to pre-arrival data for freight movements, particularly for goods from the EU, limiting its targeting capability for border security purposes."

- **13.48** [Redacted].
- **13.49** [Redacted].
- **13.50** Furthermore, officers stated that the information they required was either not easy to obtain or simply not available due to a lack of legislation. [Redacted].
- 13.51 In November 2020, it was expected that EU transition would bring data opportunities and significant increases in freight data flows. It was envisaged that Cerberus would bring together all data feeds and targeting systems onto one platform. As a result, there would be no need for targeters to double key or check multiple systems, meaning they could spend more time looking at data rather than "chasing data". [Redacted].<sup>87</sup>
- **13.52** [Redacted].88
- **13.53** [Redacted].
- 13.54 [Redacted].
- 13.55 As part of the '2025 UK Border Strategy', there are plans to develop a 'Single Trade Window' (STW), which aims "to create a single gateway for all data from traders into government", allowing traders and their intermediaries to submit information to the government just once. One aim of the STW is that traders will encounter fewer checks when information is provided prior to arrival. When checks take place, they will be quicker to conduct. It was anticipated that "risk engines have more advanced analytics to support frontline officers to make better decisions; and illegal migration and illicit goods will be more efficiently detected through improved non-intrusive inspection technology."<sup>89</sup>
- **13.56** [Redacted].

## **Management information**

13.57 In July 2022, the National Audit Office (NAO) published a good practice guide entitled 'Improving government data: A guide for senior leaders'. The guide stated that, "High-quality data is essential for effective service delivery, performance monitoring and improvement. The key problem is data quality – without this, data cannot be trusted."90

<sup>87 [</sup>Redacted].

<sup>88 [</sup>Redacted].

<sup>89</sup> Cabinet Office, '2025 UK Border Strategy', (published 17 December 2020) <a href="https://www.gov.uk/government/publications/2025-uk-border-strategy">https://www.gov.uk/government/publications/2025-uk-border-strategy</a>
90 National Audit Office, 'Improving government data: A guide for senior leaders', (published 21 July 2022), <a href="https://www.nao.org.uk/insights/">https://www.nao.org.uk/insights/</a>

improving-government-data-a-guide-for-senior-leaders/

**13.58** High-quality management information (MI) depends on good data quality. The Home Office describes MI as:

"The datasets and products that transform raw data relating to Home Office business activities into outputs that inform management/policy decision making, provide inputs into more complex analysis, and support internal and external accountability."

- 13.59 Inconsistent MI reporting was listed as a residual issue in the 2022 'PIONEER Handover Report'. A senior intelligence manager told inspectors that each team had their own way of collating figures and that, previously, they would have used their own databases to produce MI. As discussed in chapter 12, the Central Operations Platform (COP) was not fully functional, and it could not produce the MI reports required by managers.
- 13.60 Due to this lack of functionality, teams had to spend a long time reviewing data. The impact of this was explained by a manager who told inspectors that it could take a month to collect the information required and ensure it was correct. However, the senior intelligence manager said that COP superusers were attempting to fix the issue. Difficulties caused by the accuracy and integrity of data, and the impact this had on the use of analytics was an issue raised in the NAO's 'Improving government data: A guide for senior leaders'.
- 13.61 As discussed in chapter 12, both frontline and intelligence staff told inspectors that the COP did not perform in the way they needed it to. Based on feedback they had received, it was not providing the data senior managers required. They had reported these issues and were now "exhausted with it". These frustrations and difficulties led to staff not completing entries on COP or asking law enforcement agencies to add intelligence to their systems.
- 13.62 A BFID performance manager told inspectors that they had to collate target and seizure information from up to 15 separate spreadsheets each month. They then had to assure them against the figures provided by the Performance Reporting & Analysis Unit (PRAU), as discrepancies could exist where two different teams claimed the same seizure. <sup>91</sup> To obtain seized goods and adopted cash data, PRAU used the electronic Property Management System (ePMS). The data could be filtered by commodity but not by mode. <sup>92</sup>
- **13.63** [Redacted].<sup>93</sup>
- 13.64 As stated in chapter 7, due to issues with IT systems, frontline staff were having to duplicate data entry tasks. Intelligence staff told inspectors that this 'double keying' raised the risk of fragmented data. Complicated, time-consuming systems can dissuade staff from entering information on them. While the MI presented to the senior management team could look accurate and complete, it was possible that it did not accurately reflect the reality of frontline interdictions.
- 13.65 Senior intelligence managers told inspectors they were aware of the issues relating to MI. Time-consuming workarounds had been devised in order to provide reliable business information to the senior management team. A senior manager told inspectors that the variety of different sources made the collection of MI difficult. They added that they were looking at setting up a dedicated performance and reporting team to give one version of the truth. Work was also being undertaken with the National Operational HQ Data Cell to resolve these issues

<sup>91</sup> Performance Reporting & Analysis Unit (PRAU) – the Home Office unit that leads on reporting and analysis of performance for internal and external publications for the department.

<sup>92</sup> The electronic Property Management System (ePMS) provides one central repository for recording all seized items.

<sup>93 [</sup>Redacted]

as a priority workstream.<sup>94</sup> Senior managers told inspectors that in the future, COP would provide all MI as it would have an interface with Cerberus.

#### **Assurance**

- 13.66 One of the ICIBI's 'expectations' is that errors are identified, acknowledged, and promptly 'put right'. Having effective assurance measures in place can help identify and address errors. BFID's assurance processes are governed by the 'Border Force Assurance Expectations', which were updated in October 2022. These set out the assurance expectations for a variety of activities, or 'themes' undertaken by Border Force. Managers are responsible for assurance and for making sure assurance expectations are met.
- 13.67 In a narrative explanation, the Operational Assurance Directorate (OAD) told inspectors that they had, "Worked together with intelligence colleagues to improve the knowledge of risk and assurance governance structures within Border Force and improve the compliance levels of first line assurance reporting. The intelligence assurance team schedule assurance sessions to cascade assurance reminders linked to emerging issues." 96
- 13.68 How assurance is undertaken and the frequency of management checks are decided locally. The assurance expectations document contains a number of risk-based 'priority indicators' by theme that must be subjected to regular testing or assurance. Assurance leads are responsible for returning monthly assurance activity and findings to OAD.
- **13.69** In the document, the theme on 'Our People' contained the expectation that:
  - "Staff and BF [Border Force] contractors are appropriately skilled, trained, and designated, to allow them to carry out the roles and tasks assigned to them professionally. They are managed properly and supported in accordance with the Border Force and Home Office values."
- 13.70 It also included a priority indicator that, "All staff are suitably trained / given awareness training (including relevant mandatory E-Learning) for any role they undertake and receive relevant refresher training within required timescales." As covered in chapter 11, inspectors identified that some staff in BFID had not been suitably trained. Senior managers appeared to be surprised about the training issues raised by inspectors and said they were reliant on training co-ordinators to raise training requests. It was unclear whether managers had provided assurance on this priority indicator to OAD and, if they had, what action OAD had taken in response.
- **13.71** Of most relevance to this inspection was the theme of 'Information, intelligence, & data', which included the expectation that:

"Information, intelligence, and data is collected, handled, processed, and disseminated in accordance with legislation / instructions and used to best effect to support BF [Border Force] operational priorities and facilitate continuous improvement."

<sup>94</sup> The National Operational HQ Data Cell receives requests for information, manages data repositories, and considers what demands may be on the horizon as policies change. The National Operational HQ Data Cell also produces reports to inform high level decision making by policy makers, operational leaders, and ministers.

<sup>95</sup> The expectations are grouped into 16 themes: "1. Business oversight, 2. Our people, 3. Health, Safety & Wellbeing, 4. Treatment of people encountered by BF, 5. Equipment, 6. Information, intelligence, & data, 7. Pre-arrival / international BF activity, 8. Immigration (PCP) operations, 9. 'Clandestines', small boats, & civil penalties, 10. Customs activity, 11. Cyclamen & radiation safety, 12. Postal, 13. QWs [Queen's [King's] Warehouses], lockups & temporary storage, 14. Post Seizure casework, 15. Immigration casework, 16. Detention, Custody & Immigration Bail".

96 OAD provides second line assurance of Border Force operational activity that assists Border Force to deliver a programme of continuous improvement.

- **13.72** Inspectors noted that there were no priority indicators for this theme, which meant that no indicators had to "be subjected to regular and routine assurance/testing".
- 13.73 Staff at all grades and across BFID teams told inspectors that their work was assured and that they received feedback during monthly one-to-one conversations, or on an ad-hoc basis, if required. Assurance was also raised during a BFID Intelligence Tasking and Co-ordination Group meeting. A working group looked at the quality of intelligence reports on the Single Intelligence Platform, with the overarching objective of improving the quality of intelligence reports.
- Inspectors were provided with details of the assurance process followed by Home Office Intelligence Analysis (HOIA) teams. Analysts told inspectors that they would peer review each other's work before it was sent to a manager for review and sign off. In addition to this, and on "most occasions," a senior manager would also conduct a review of the products. HOIA staff told inspectors that products were always signed off by managers before they were sent to customers. Senior management also provided positive and negative feedback on the products, and this could be used to revise and re-issue products if required. Managers told inspectors about a monthly assurance consistency meeting, where they would be given a product that had already been published for grading and assessment.
- 13.75 Intelligence staff told inspectors about assurance processes used in a modal hub. Managers conducted assurance checks on 10% of category A and category B targets and 5% of category C targets before they were sent to frontline officers, providing feedback to staff where needed. The aim of the feedback was to make sure the officers' skills were up to date and to identify any training issues. Assurance on targets was undertaken regardless of whether an intervention had taken place or not. This information was kept by Higher Officers and raised with Senior Officers for consideration when the monthly OAD returns were completed. In addition to these routine assurance checks, a modal hub senior manager told inspectors that the first thing they did in the morning was check the targets issued by the hub over the previous 24 hours. They checked 100% of targets issued by the team and, where improvements were needed, they would provide feedback to the officers via their managers.
- 13.76 Inspectors spoke to staff and were shown documents about the assurance processes completed by teams that were not solely staffed by Border Force. The database used by the Gateway Multi-Agency Hub (Gateway MAH) for recording the receipt, research, development, production, and dissemination of intelligence also allowed managers to monitor and manage performance, including assurance. This assurance function was used by managers to ensure that standard operating procedures (SOPs) and intelligence handling requirements were met.
- 13.77 Although staff told inspectors about the high levels of assurance being undertaken, especially in HOIA and UMH, some managers were unable to do as much assurance as they wanted to. A senior manager told inspectors that they would like to do 100% assurance, but this was not possible, and they had fallen behind with their assurance work due to staffing pressures.
- 13.78 The 'Border Force Director's Risk Register' from May 2022 recorded, "there is currently no central co-ordination of internal reviews and lessons learned within BFID, and limited co-ordination and tracking from BF [Border Force] OAD" and that "discussion of reviews and recommendations is often between individuals and business areas directly involved but not shared more widely in the SLT [senior leadership team] or across the Directorate". 97

<sup>97</sup> The Home Office, in its factual accuracy response, stated: "This is a reference to internal reviews only and is about HOI (Borders) learning more widely from lessons learnt exercises."

- **13.79** A senior manager told inspectors, "There should be more of a role for OAD to come in and assure." For assurance to be fully effective, managers and staff needed adequate time to conduct these checks and to implement changes as a result of assurance.
- **13.80** Figure 35 below summarises the areas of performance management and assurance which are working well and those which require attention.

Figure 35: Conclusions – performance management and assurance

Working well	Requires attention
<ul> <li>High levels of assurance being undertaken</li> </ul>	<ul> <li>The absence of targets and consideration of their introduction</li> </ul>
	• [Redacted]
	<ul> <li>The collation of management information</li> </ul>

#### Conclusions

There were high levels of assurance taking place, and this was used by team managers to identify training gaps and improve the quality of the work of their teams. Central co-ordination of internal reviews and lessons learned within Border Force Intelligence Directorate (BFID) is required to prevent siloed learning and development.

Other than HM Treasury revenue protection targets, there were no performance targets set for BFID teams. An absence of targets makes it hard for managers to assess performance. Before the introduction of numerical targets, BFID should assess the potential impact they may have on the quality of the work produced by officers.

The Unaccompanied RoRo Hub is hampered by a lack of data and the legislation required to enforce its provision. [Redacted].

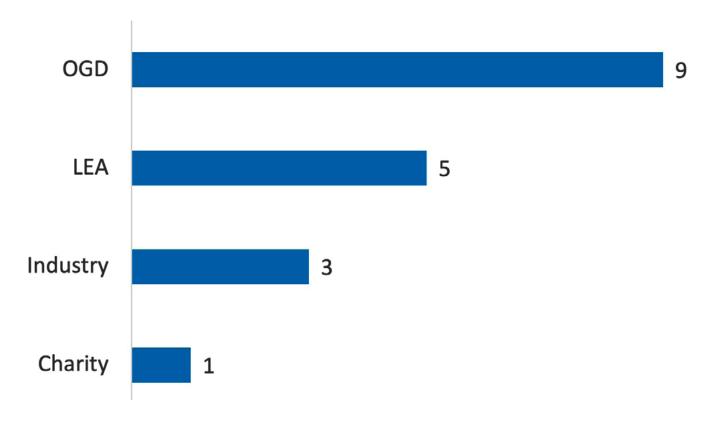
The collation of management information is hampered by poorly performing IT systems. There is a risk that failure to input data into these systems, either due to resource constraints or frustrations with these systems, means that senior managers will not have a full picture of interdictions at the border or an accurate assessment on the impact of BFID's intelligence products.

## **Annex A: Analysis of stakeholder submissions**

On 16 June 2022, the Independent Chief Inspector of Borders and Immigration (ICIBI) published a "call for evidence" on the ICIBI website. 98 This invited "anyone with relevant knowledge and expertise" to provide evidence and views on Border Force intelligence functions at the Humber ports. The Independent Chief Inspector also wrote directly to a number of stakeholders. 99

The ICIBI received 18 substantive responses. These were from nine other government departments (OGDs), five law enforcement agencies (LEAs) or officers, three industry bodies, and one charitable organisation, as illustrated in figure 36. In some cases, inspectors conducted more in-depth conversations with these stakeholders.

Figure 36: Call for evidence responses by stakeholder type



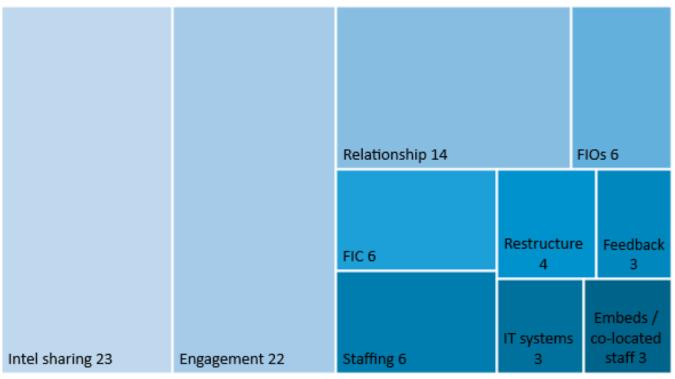
<sup>98</sup> Independent Chief Inspector of Borders and Immigration, 'Call for evidence: An inspection of the Border Force intelligence functions at the Humber ports' (published 16 June 2022), <a href="https://www.gov.uk/government/news/call-for-evidence-an-inspection-of-the-border-force-intelligence-functions-at-the-humber-ports">https://www.gov.uk/government/news/call-for-evidence-an-inspection-of-the-border-force-intelligence-functions-at-the-humber-ports</a>

<sup>99</sup> The ICIBI wrote to 48 stakeholders in total – these were a mix of law enforcement agencies, public bodies, other government departments, and industry stakeholders. Twenty-seven stakeholders had replied (this included 'Nil responses' (5), extension requests (4) and substantive replies (18)).

#### **Common themes**

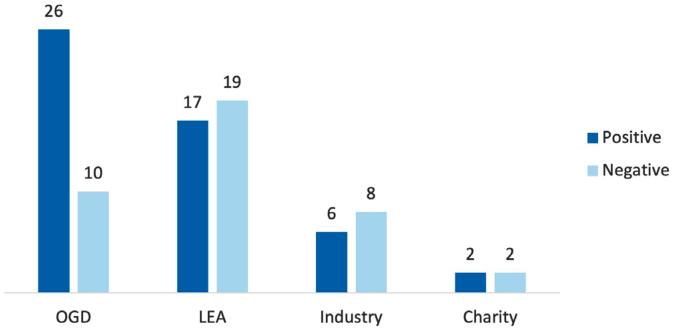
Inspectors analysed the submissions for common themes and key points, as illustrated in figure 37 below. The theme referred to most frequently was 'intelligence-sharing'. This was mentioned 23 times, closely followed by 'engagement' (22 times), and then 'relationship' (14 times).<sup>100</sup>

Figure 37: Frequency of references by theme



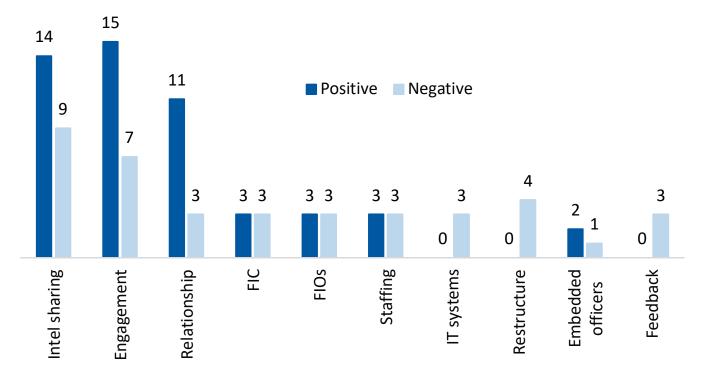
Inspectors assessed the responses from OGDs to be mostly positive (72%), while those from LEAs and industry stakeholders were slightly more negative (53% and 57% respectively). Responses from the charitable organisation were balanced. These findings are shown in figure 38 below.

Figure 38: Positive and negative responses by stakeholder group



The proportion of positive and negative responses by theme is illustrated in figure 39 below.

Figure 39: Positive and negative responses by theme



## Other government department responses

All the responses received from OGDs said that engagement with Border Force was good. Engagement took place at a national level, where many OGDs attended a variety of meetings with Border Force representation. For some OGDs, engagement also took place at an operational level.

Intelligence and information sharing between Border Force and OGDs took place in a variety of ways, but some OGDs said that in some cases a formalised, standard approach was needed.

No OGD respondents provided negative comments on the relationship between them and Border Force. Some highlighted the benefits of having co-located or embedded staff in each other's departments. One said that where an embedded Border Force officer had not been replaced it had impacted both agencies, and that the creation of a dedicated point of contact or a replacement for the embedded officer would enable rapid access to resources and data systems.

## Law enforcement agencies responses

The LEAs provided positive responses in relation to intelligence sharing and engagement. They said intelligence sharing needed to be standardised, with a clear understanding of how intelligence could be shared and disseminated to the correct LEA. The sharing of intelligence was made harder due to Border Force's single point of contact (SPOC) email address "changing constantly", which could be confusing. Despite a Memorandum of Understanding (MoU) existing in the multi-agency hubs (MAH), this had not removed all of the barriers for the LEA to check and use all of the information collected by Border Force. 101,102

The LEAs attended numerous meetings where Border Force representatives were present, and received briefings from Border Force. On occasion, strategy documents had to be requested rather than them being proactively provided. One LEA said they had learned about the creation of the Forward Intelligence Cell (FIC) in Hull from another LEA rather than from Border Force. The current set up of the FIC did not reflect the original plans, suggesting that it was a scaled-down version. They questioned whether it was doing work that was already being done elsewhere. But others said that the creation of the FIC had led to increased collaborative working but needed work to achieve its potential.

Relationships between the LEAs and Border Force were mostly positive, although one said that improvements could be made. One LEA said that Border Force intelligence systems were "archaic", and they had been told that the intelligence submission process was "very time consuming and complicated to complete". The separation of the intelligence collection and intelligence development functions of the field intelligence officer (FIO) role had created "uncertainty over the current focus and deployment of FIOs..." but this had not stopped the "genuine unity" and removal of barriers within the joint team in Hull, which had led to "excellent collaborative working". 103

## **Industry responses**

Responses from industry stakeholders described their willingness to provide intelligence to Border Force which was compromised by a lack of Border Force contact details, strategic engagement, and formal information-sharing arrangements. As a result, intelligence sharing tended to take place between individuals. One industry stakeholder noted that meetings between Border Force and industry

<sup>101</sup> At the time of this stakeholder submission, 8 July 2022, the response acknowledged that the MoU was "subject to a current review to update it".

102 The Home Office, in its factual accuracy response, stated: "The address was changed when .gsi was removed from Home Office e-mails and when CCU [Command and Control Unit] was launched."

<sup>103</sup> During familiarisation, inspectors were told that the FIO role had been split into 'collection' and 'development', with FIOs now doing one or the other.

stakeholders had stopped, and Border Force did not attend Port Security Authority meetings, the agenda for which included intelligence issues.<sup>104</sup> Another said that they did not receive any feedback on the information they provided. There was no general or routine interaction between industry stakeholders and Border Force.

## **Charity responses**

The response from the charitable organisation described the relationship with Border Force at a national level as "positive and working well", but at a local level their regional manager for the Humber port had not taken part in specific meetings and had not received requests to undertake work for Border Force. The charity said it provided a "significant" amount of information to Border Force and said it would have been beneficial to receive feedback on it.

# Annex B: Role and remit of the Independent 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, s hort-term holding facilities and under escort arrangements are excepted insofar as these are subject to inspection by His Majesty's Chief Inspector of Prisons or His 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
- whether 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.

## **Annex C: ICIBI's 'expectations'**

Background and explanatory documents are easy to understand and use (for example, Statements of Intent (both ministerial and managerial), Impact Assessments, Legislation, Policies, Guidance, Instructions, Strategies, Business Plans, intranet and GOV.UK pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

## Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

# Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

## Decisions and actions are 'right first time'

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

## Errors are identified, acknowledged and promptly 'put right'

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

## Each immigration, asylum, nationality or customs function has a Home Office (BICS) 'owner'

- The BICS 'owner' is accountable for:
  - implementation of relevant policies and processes
  - performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
  - resourcing (including workforce planning and capability development, including knowledge and information management)
  - managing risks (including maintaining a Risk Register)
  - communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
  - effective monitoring and management of relevant contracted out services
  - stakeholder engagement (including customers, applicants, claimants and their representatives)

## **Annex D: Glossary**

Term	Description
АСРО	Association of Chief Police Officers
AHW	Annualised hours working
[Redacted]	[Redacted]
ARM	Accompanied RoRo Modal Hub – modal hub based in Dover with responsibility for accompanied RoRo freight and tourist traffic in the Southeast
[Redacted]	[Redacted]
BF	Border Force
BFCS	Border Force Control Strategy
BFID	Border Force Intelligence Directorate
BFNIH	Border Force National Intelligence Hub
[Redacted]	[Redacted]
BICS	Borders, Immigration and Citizenship System
BSG	Border Strategy Group
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
ССТС	Clandestine Channel Threat Command
CCU	Command & Control Unit
СЕМА	Customs and Excise Management Act 1979
[Redacted]	[Redacted]
СОР	Central Operations Platform
[Redacted]	[Redacted]
СТВОС	Counter Terrorism Borders Operations Centre
СТР	Counter-Terrorism Policing

Term	Description
DEFRA	Department for Environment, Food & Rural Affairs
DfT	Department for Transport
DVSA	Driver and Vehicle Standards Agency
[Redacted]	[Redacted]
DWP	Department for Work & Pensions
[Redacted]	[Redacted]
[Redacted]	[Redacted]
FAQs	Frequently asked questions
FEDAT	Freight Engagement & Data Acquisition Team
FIC	Forward Intelligence Cell in Hull
FIO	Field intelligence officer
FSA	Food Standards Agency
FTE	Full-time equivalent
Gateway MAH	Gateway Multi-Agency Hub
GDPR	General Data Protection Regulation
HMICFRS	His Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HMRC	His Majesty's Revenue & Customs
ноі	Home Office Intelligence
HOIA	Home Office Intelligence Analysis
IA&A	Intelligence Analysis & Assessment
ICIBI	Independent Chief Inspector of Borders and Immigration
IE	Immigration Enforcement
IG1, IG2, IG3 & IG4	Intelligence collection groups covering different geographical regions
IPP	Intelligence Professionalisation Programme
IPR	Intellectual property rights
ITCG	Intelligence Tasking and Co-ordination Group
JAG	Joint Action Group
JBIU	Joint Border Intelligence Unit
KRAKEN	Project KRAKEN – joint initiative between NCA, police, and Border Force established in 2008 to encourage the public to report any unusual or suspicious activity near the UK coastline and in maritime environments immediately
LEAs	Law enforcement agencies
МАН	Multi-agency hub
MHRA	Medicines and Healthcare products Regulatory Agency

Term	Description
MI	Management information
Microsoft Teams	Video conferencing application
MINERVA	Transformation programme to merge the intelligence functions of Border Force and Immigration Enforcement
MoRiLE	Management of Risk in Law Enforcement – a process used to score and prioritise operational work
MoU	Memorandum of Understanding
MPEL	Modular Programme of Enhanced Learning
MVP	Minimum viable product
NAO	National Audit Office
NBTC	National Border Targeting Centre – processes advanced passenger information (API) on individuals intending to travel to, or from, the UK
NCA	National Crime Agency
NEYH	North East and Yorkshire and Humber region
NIM	National Intelligence Model
OAD	Operational Assurance Directorate
ODP	Outcome delivery plan
OGD	Other government department
ОНО	One Home Office transformation plan, including the amalgamation of Border Force and Immigration Enforcement into one capability
OIC	Organised immigration crime
Ops ITCG	Operational Intelligence Tasking and Co-ordination Group
[Redacted]	[Redacted]
PCP	Primary control point
PEEL	Police effectiveness, efficiency and legitimacy – inspection methodology used by HMICFRS
PEGASUS	Operation PEGASUS – an initiative to encourage the public to provide information on crime related to general aviation (the aviation equivalent of KRAKEN)
PHIA	Professional Head of Intelligence Analysis
PIONEER	Programme to restructure Border Force Intelligence from a regional to modal structure
PND	Police National Database
[Redacted]	[Redacted]
[Redacted]	[Redacted]
PRAU	Performance Reporting & Analysis Unit
PSA	Port Security Authority

Term	Description
R&R	Reward and recognition
ROCU	Regional Organised Crime Unit
RoRo	Roll-on Roll-off freight
RRA	Retention and recruitment allowance
SAMS	Border Force Safeguarding and Modern Slavery team
[Redacted]	[Redacted]
SFG	Specialist Freight Group
SharePoint	Home Office central corporate repository
SIP	Single Intelligence Platform
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
SLT	Senior leadership team
SOs	Senior Officers
SOPs	Standard operating procedures
SPOC	single point of contact
STA	Strategic Threat Assessment
STCG	Strategic Tasking and Co-ordination Group
STW	Single Trade Window – a single gateway for all data from traders into government
TCG	Tasking and co-ordination group. The TCG process provides managers with a decision-making mechanism with which to manage their business both strategically and tactically
том	Target operating model
TTCG	Tactical Tasking and Co-ordination Group
UMH	Unaccompanied RoRo Modal Hub based in Hull and Immingham
[Redacted]	[Redacted]
[Redacted]	[Redacted]
YHROCU	Yorkshire and Humber Regional Organised Crime Unit

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