



An inspection of Border Force's fast parcels operations

May–July 2023

David Neal

Independent Chief Inspector of
Borders and Immigration

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Foreword

This is my second recent inspection of Border Force activity that concludes that the service is neither efficient nor effective. This inspection finds evidence of an inconsistent picture of Border Force's response to fast parcels and a huge gap between the ambition contained in UK Border Strategy 2025 and delivery on the ground.

This inspection area was included in my programme at the request of the Home Office, and I have made a series of recommendations which, if implemented, will improve the effectiveness and efficiency of Border Force functions.

Many of these recommendations address symptoms of a bigger issue, and one which Alexander Downer identified in his review of Border Force, which was published in July 2022. Downer recommends that Border Force's Operating Mandate, implemented in 2015, should be reviewed and updated, and I repeat that recommendation to the Home Office.

Simply put, the operating mandate is effectively a directive or 'orders' from ministers to Border Force. Prioritisation and resourcing decisions fall out of those orders, and it is the impact of those decisions that is being inspected here. The Operating Mandate is now eight years old and fails to reflect recent changes that have affected the border, such as EU exit, COVID-19, and the migrant crisis of small boats crossing the English Channel, as well as, in this instance, the burgeoning fast parcels sector.

[Redacted]

Whatever the intention of the Operating Mandate, it is interpreted by staff on the ground as "100% checks on people and no queues at the border". This is known from the top to the bottom of Border Force, and results in staff being routinely diverted from what they perceive to be their primary duties to deal with other priorities. In turn, this fuels feelings of disengagement and unmet expectations of the staff, which was encountered on this inspection. Critically, there remains a crisis of identity, with staff identifying as 'customs' or 'immigration', even though the organisational distinction was lost when the Border Agency was established in 2008.

The vision of the UK Border Strategy 2025 sees technology plugging much of the work carried out by Border Force staff, but there is very little evidence of technology encountered on this inspection. In time, improved intelligence will better identify risks and provide more accurate targeting.

The Prime Minister's commitment on 24 July 2023 to fundamentally reform the Home Office and Border Force is one of the objectives of the ten point plan to tackle immigration. This reform should place a high priority on a refresh of the Operating Mandate.

This report makes ten recommendations and was sent to the Home Secretary on 28 September 2023.

A handwritten signature in black ink, appearing to read 'David Neal', with a horizontal line underneath.

David Neal
Independent Chief Inspector of Borders and Immigration

1. Background

Fast parcels

- 1.1** A fast parcel is a consignment where a premium has been paid to send it quickly, providing the customer with a timebound, door-to-door service. Often, the customer, either a business or a private individual, is able to track the parcel throughout its journey. The process is usually undertaken by the consignor (the sender), or an intermediary, on behalf of the consignee (the receiver) in order to import parcels from overseas into the UK. Any importation costs are included in the price of shipment and recouped.
- 1.2** Fast parcels are distinct from other 'postal packets', which are usually delivered using a public postal service and are a slower and cheaper option. This mode of delivery is often referred to as 'King's Mail' and in the UK is undertaken by Royal Mail Group.¹

The express delivery industry

- 1.3** In 2020, the global parcels market was valued in excess of £200 billion, and the UK was one of the fastest growing markets for fast parcels, increasing by 11.6%.²
- 1.4** Numerous external factors have impacted the express delivery industry, alongside improvements in technology. The UK's exit from the EU has changed its trade relationship with Europe, and consequently goods from the EU are no longer considered to be in free circulation but are now subject to the same customs procedures as goods from the rest of the world.
- 1.5** Additionally, perhaps the most prevalent impact is that of the Coronavirus (COVID-19) pandemic, which "accelerated online purchases and package deliveries at an unprecedented rate". After "a short deceleration as a result of limited air cargo capacity, international deliveries are now growing twice as quickly as domestic ones", and it is anticipated that, by 2030, cross-border e-commerce will likely increase in value to \$1 billion (£770 million).³
- 1.6** In the UK, the fast parcels industry has most of its distribution hubs in the Midlands, known as the logistics 'golden triangle', where 98% of the UK population can be accessed by road within four hours.⁴

1 Postal Services Act 2000, section 105. <https://www.legislation.gov.uk/ukpga/2000/26/section/105>

2 Apex Insight, 'Global parcel delivery market insight report 2021' (published May 2021), <https://apex-insight.com/product/global-parcel-delivery-market/>

3 McKinsey & Company, 'Signed, sealed, and delivered: unpacking the cross-border parcel market's promise' (published 17 March 2022), <https://www.mckinsey.com/industries/travel-logistics-and-infrastructure/our-insights/signed-sealed-and-delivered-unpacking-the-cross-border-parcel-markets-promise>

4 A distribution hub is a facility that handles deliveries from one point to the next.

Air movements and road movements

- 1.7** Border Force differentiates fast parcel operators (FPOs) based on their mode of arrival in the UK. The three largest couriers engaged in the market are referred to by Border Force as the 'Big 3', and the next largest couriers are known as the 'non-Big 3', alongside other FPOs.
- 1.8** The 'Big 3' move most of their fast parcels by air. [Redacted]. ASNs are provided to Border Force as a requirement of Customs Freight Simplified Procedures, which allow couriers who import goods to delay the making of declarations to His Majesty's Revenue and Customs (HMRC) and make any duty payments after importation.⁵
- 1.9** The 'non-Big 3' move fast parcels by road, normally having arrived in the UK via a seaport. Upon arrival in the UK, parcels are then driven to facilities where they are sorted for onward delivery, prior to any customs clearance. These facilities are known as external temporary storage facilities (ETSF).⁶ [Redacted]. Post EU exit, Border Force reported that the volume of fast parcels arriving in the UK via this method has decreased significantly, owing to the burden of bureaucracy now placed on couriers and their own commercially driven decisions to focus on domestic rather than international delivery markets.

Border Force organisation

- 1.10** East Midlands Airport (EMA), which sits within Border Force's Central Region, receives the largest number of fast parcels in the UK, accounting for 90% of all movements. It is the largest UK airfreight port outside Heathrow.⁷ While other Border Force regions are involved in fast parcels operations, this inspection focused on those within Central Region, with particular focus on teams based at EMA, Birmingham Airport, and a regional 'Fast Parcels Strategic Operations Team' based in Coventry International Hub.
- 1.11** In 2019, Border Force created an 'Inland Border Command' (IBC), "to provide a resilient and effective response to known and unknown risks at the UK Inland Border, particularly post-EU Exit." The command currently has [Redacted] staff posts across five distinct operations. These are:
- fast parcels
 - Midlands freight
 - postal (King's mail)
 - rail freight
 - inland pre-clearance (IPC)

In combining resources into one command under the IBC, Border Force sought to create a "well-resourced, flexible Command that provides ... an operational arm fit for the future and capable of managing [these] risks, both within Central Region and beyond by securing the inland border of the UK."

⁵ HM Revenue & Customs, 'Making a simplified frontier declaration' (published 5 November 2019), <https://www.gov.uk/guidance/making-a-simplified-frontier-declaration>

⁶ External temporary storage facilities (ETSFs) are "approved places situated outside the appointed area of an approved port/airport where chargeable goods may be held until they are assigned to a customs approved treatment or use." HM Revenue & Customs, 'HMRC internal manual: Temporary storage of imports' (published 18 May 2022), <https://www.gov.uk/hmrc-internal-manuals/temporary-storage-of-imports/tsi001400>

⁷ Airfreight is the shipment of goods by an air carrier.

- 1.12** The Midlands freight function encompasses teams at both Birmingham and East Midlands airports. At EMA, the operational team focuses mainly on the fast parcels operations based there. Staff from the Birmingham freight teams manage freight arriving at Birmingham Airport. They also manage road movements of goods into ETSFs and are supported in this by the Fast Parcels Strategic Operations Team.
- 1.13** The Fast Parcels Strategic Operations Team was created with the support of EU funding and focused initially on the ‘non-Big 3’ fast parcels companies. In its position statement, Border Force stated that as the IBC evolved, “following EU Exit, [as] the international traffic through these operators changed and there is a continuing need to understand routings of parcels and continually organise our response in terms of data, deployment and detection equipment [and] ... for identifying new routes and to recognise the FP operator’s latest trends of carrying parcels in the Midlands.”

Legislation and policy

- 1.14** Border Force officers conducting customs examinations of postal packets use powers conferred under Section 159 of the Customs and Excise Management Act 1979 (CEMA 1979).⁸
- 1.15** Section 159 allows Border Force officers to “examine and take account of goods”.
- 1.16** HMRC is responsible for setting the customs requirements that FPOs and their users must adhere to when importing and exporting goods to and from the UK. HMRC also retains responsibility for the Customs and Excise Management Act 1979. Border security checks to be conducted by Border Force officers on freight and post arriving is defined in the ‘Border Force Operating Mandate version 3’, published in February 2015.

⁸ An amendment to section 159 of CEMA 1979, inserted by Section 7 of the Postal Packets (Revenue and Customs) Regulations 2011, allows Border Force staff to use this power to open and examine fast parcels. <https://www.legislation.gov.uk/ukpga/1979/2/section/159>

2. Key findings

- 2.1** This inspection examined Border Force's capability in detecting prohibited and restricted items in fast parcels. The inspection makes the following key findings:

Border Force Operating Mandate

- 2.2** The Border Force Operating Mandate (BFOM) currently places a heavy emphasis on immigration checks on arrivals to the UK. The Border Force Control Strategy (BFCS) gives priorities to other activities, which are then resource dependent. This decision inevitably impacts on Border Force's ability to promptly address the border security risks in fast parcels at the UK border. With the exception of some intelligence-led targeting and checks to identify radiological and nuclear substances, mandated immigration checks on all arriving passengers means that checks for prohibited and restricted commodities in fast parcels, in effect, become a lower priority.
- 2.3** Regional practices, wherein category C targets are deselected and are not scanned to determine the level of search required, means that Border Force may not be meeting the requirements of the Operating Mandate.
- 2.4** The fast parcels industry perceives that Border Force prioritises immigration functions over customs activity, which is detrimental to the stakeholder relationship.

Resourcing and recruitment

- 2.5** Current staffing levels in fast parcels are inadequate, exacerbated by the need to reallocate staff resources to other operational activities that the BFOM and BFCS direct to be higher priority, such as conducting immigration checks on all arriving passengers.
- 2.6** Resourcing is further impacted by a prolonged and protracted recruitment process and the availability of timely training to ensure individuals are proficient to undertake the full range of tasks allocated to them.

Detection methodologies

- 2.7** Inspectors encountered Border Force staff who demonstrated enthusiasm and dedication in identifying prohibited and restricted items from entering the UK via fast parcels.
- 2.8** Border Force intelligence is increasingly strategic in approach, and the National Fast Parcels Targeting Team (NFPTT) has proven valuable in enhancing the efficiency and effectiveness of identifying prohibited and restricted items within fast parcels.
- 2.9** [Redacted]

- 2.10** However, challenges persist in Border Force's detection methodologies. The relationship between operational staff and the NFPTT restricts Border Force's effectiveness in identifying prohibited and restricted goods.
- 2.11** [Redacted]
- 2.12** Instances of transporting consignments without full confirmation of the contents poses both legal and health and safety risks.
- 2.13** The overall efficiency and effectiveness of self-selection of parcels for examination remains uncertain.
- 2.14** Current Border Force practices could potentially damage operational effectiveness, such as the movement of goods from remote points of interception to Border Force premises for examination.

Detection equipment

- 2.15** Effective detection equipment is essential for successful border security. Border Force staff hold confidence in chemical detection equipment and rely on drug field tests where available, bolstering their effectiveness.
- 2.16** Nonetheless, improvement is needed. The structure and responsibilities of teams managing detection equipment are needlessly complex, affecting operational efficiency.
- 2.17** Inconsistent equipment provision across locations adds challenges. A notable absence of a plan to repair, replace, or upgrade ageing or obsolete equipment hampers Border Force's technological readiness.
- 2.18** Training on detection equipment is not seamlessly integrated into the Border Force training programme, with a lack of ongoing refresher training.
- 2.19** [Redacted]
- 2.20** The effectiveness of the regime to monitor equipment serviceability readiness is questionable, and safety equipment to transport hazardous substances is notably absent.

Management information

- 2.21** Efficient performance management information is pivotal to ensuring operational efficiency and effectiveness. Currently, Border Force officers input seizure information into multiple record-keeping systems, which leads to inefficiencies.
- 2.22** Border Force uses databases that are owned by HMRC. Managers face the challenges of not being able to extract meaningful management information from these. There is, therefore, an overreliance on inconsistent locally maintained spreadsheets for performance data.
- 2.23** While Border Force publishes high-level customs transparency data, its lack of detailed breakdown hampers its relevance, particularly for stakeholders.

- 2.24** Moreover, records of all interceptions of fast parcels by Border Force, including the grounds for interceptions, are not consistently recorded, limiting both the ability to measure effect and demonstrate accountability in its use of customs powers.

Assurance, risk, and culture

- 2.25** Border Force's governance regime can be improved. Assurance regimes at first and second line are inadequate in addressing routine performance concerns. The identification and management of operational risks is also poor.
- 2.26** Culturally entrenched behaviours and a lack of a distinct corporate identity impact the effectiveness of fast parcels teams.

Engagement

- 2.27** Engagement with stakeholders is vital for success, especially against the context of government-wide strategies to make the UK border "the most effective border in the world".⁹
- 2.28** While local-level working relationships are excellent, strategic levels of engagement exhibit inconsistency and ineffectiveness. Government departments responsible for controlling prohibited or restricted items actively seek enhanced engagement with Border Force, both operationally and tactically, but struggle to be able to do so.

⁹ Cabinet Office, 'UK Border Strategy 2025' (published 17 December 2020), <https://www.gov.uk/government/publications/2025-uk-border-strategy>

3. Recommendations

The Home Office should:	
Border Force Operating Mandate	
1.	review the Border Force Operating Mandate in order to refresh the direction to Border Force
Resourcing and recruitment	
2.	conduct a review of Central Region resourcing to ensure it is able to fully address the threat posed by fast parcels
Detection methodologies	
3.	establish a baseline understanding of the levels of prohibited and restricted items in fast parcels to be able to measure Border Force's operational effectiveness
4.	introduce a digital solution to record all fast parcels examinations in real time, including the reasons for examinations, to provide managers with sufficient management information to plan and assure activity
Detection equipment	
5.	designate a single national team to manage detection equipment, who should: <ul style="list-style-type: none"> conduct an updated end-user-focused review to establish a baseline of detection equipment procure, install, and maintain the range and levels of detection equipment required manage detection equipment through the entire lifecycle from procurement to disposal, including providing specialist training to end-users
6.	review current methodologies for the search and transportation of suspected prohibited and restricted goods to: <ul style="list-style-type: none"> ensure the nature of any goods are fully established before transporting them so that any health and safety and legal risks are properly mitigated ensure safety equipment required to examine or transport hazardous goods is available at the point of examination
Management information	
7.	work with industry and other government departments to improve the provision of fast parcels data from all operators to enable intelligence-based targeting
8.	work with His Majesty's Revenue and Customs to obtain management information from Centaur for goods seized from fast parcels
Assurance, risk, and culture	
9.	set and assure performance expectations for all staff working in fast parcels

Engagement
<p>10. establish a national working group to better engage with its wide range of external stakeholders working in fast parcels, focused on:</p> <ul style="list-style-type: none">• aligning government and industry strategies, where possible• creating consistent and regular communication channels and feedback mechanisms

4. Scope and methodology

- 4.1** The scope of this inspection focused on Border Force's capability in detecting prohibited and restricted items in fast parcels.
- 4.2** The inspection did not consider goods moving through Royal Mail systems.
- 4.3** Inspectors undertook the following inspection activities between May and July 2023:
- reviewed open-source material, including previous ICIBI inspection reports
 - reviewed internal Home Office and His Majesty's Revenue and Customs (HMRC) policy and guidance relating to fast parcels operations and, more widely, about customs controls
 - made formal and further evidence requests to Border Force, and analysed over 25 pieces of documentary evidence provided in response to these requests
 - conducted familiarisation calls with Home Office teams involved in and supporting fast parcels operations
 - conducted interviews with a variety of stakeholders, including:
 - industry representatives and industry organisations
 - government departments and public bodies with an interest in interventions at the border, including HMRC, the Intellectual Property Office, the Department for Business and Trade, Medicines and Healthcare products Regulatory Agency, local government environmental health services with a role at the border, the National Crime Agency, and the police
 - observed fast parcels operational activity at East Midlands Airport and a remote facility in the Midlands staffed by a mobile Border Force team
 - conducted 18 interviews and focus groups with over 30 Border Force staff at grades from Administrative Officer to Senior Civil Servant

5. Inspection findings: Border Force Operating Mandate

Border Force Operating Mandate and Border Force Control Strategy

- 5.1** All of Border Force’s operational activity, including fast parcels, is governed by the strategic priorities outlined in its ‘Operating Mandate’ (BFOM) and its ‘Control Strategy’ (BFCS). The mandate outlines:
- “the full border security checks to be conducted by Border Force officers, or through automated processes, on people and accompanied goods, freight and post arriving in and – where appropriate – departing from the UK; it also defines the actions to be taken in response to the outcome of those checks.”¹⁰
- 5.2** Inspectors noted that the BFOM has not been updated since 2015, despite global changes following the Coronavirus (COVID-19) pandemic and changes in the UK’s customs regime caused by the UK’s departure from the European Union. In addition, there is a complex array of challenging threats present at the UK border, which have continued to evolve since 2015.
- 5.3** The BFCS defines a “vision for the UK border to be the most effective in the world. A border which embraces innovation, simplifies processes for traders and travellers and improves the security and biosecurity of the UK.”¹¹ Its purpose is defined internally by Border Force as setting a strategic order of priorities that resources should be allocated to, only once mandatory checks have been undertaken as set out in the BFOM.
- 5.4** There is something of a contradiction between the BFOM and BFCS. The application of the BFOM places a greater emphasis on maintaining full immigration checks at the border, whereas many customs commodities listed in the BFCS are deemed to be ‘high priority’ and pose a real risk to the UK and its citizens. Mandatory customs anti-smuggling checks are limited to maintaining a capability to undertake checks or progress targets, rather than there being a set baseline of anti-smuggling capability. During this inspection, inspectors heard from officers and managers that fast parcels resource is often redirected to support other activities, to the perceived detriment of fast parcels operations.
- 5.5** The focus on immigration over customs was evident during the inspectors’ visit to East Midlands Airport (EMA). During the two-day onsite at EMA, no officers were observed by inspectors intercepting passengers in the customs channels. Inspectors queried whether customs-trained fast parcel staff also had to deploy to the passenger customs channels, to support anti-smuggling activity on passenger traffic. Managers told inspectors: “There isn’t anybody in the customs channels.” A manager from Birmingham Airport told inspectors: “There is no one in the channels [at Birmingham] and customs is shut down for the summer, other than for category A targets.” This aligns with findings in the ICIBI inspection into queue management

10 Border Force Operating Mandate, 2 February 2015.

11 Cabinet Office, ‘2025 UK border strategy’ (published 17 December 2020), <https://www.gov.uk/government/publications/2025-uk-border-strategy>

at Birmingham Airport in 2021.¹² This lack of anti-smuggling capability at airports should be a major concern for Border Force and ministers, and raises questions as to whether the border is secure from a goods perspective.¹³

- 5.6** Inspectors also heard that Border Force officers and Border Force Higher Officers from fast parcels teams were regularly deployed to the passport control, though the value of this was questionable given that the Higher Officers were not trained in the management of the immigration control or immigration casework. Managers told inspectors: “We are not PCP [passport control] trained so we can’t give advice so we’re just there to gatekeep.”
- 5.7** Officers working in fast parcels who were trained to operate the passport control told inspectors they estimated that up to 30% of their working time in the summer was taken up with passport control deployments. As a result of these deployments, there was less staffing resource available for fast parcel activity.
- 5.8** This was a particular issue at ports, where a significant number of fast parcels staff had undertaken immigration contingency training. For example, managers told inspectors only three fast parcels staff were deployable to the passport control at Birmingham, while one of the mobile teams “could be decimated”, according to one manager, because the bulk of the team was passport control trained. The impact that this has on the wider Border Force culture is discussed further in chapter 10.
- 5.9** Managers also felt that media and ministerial focus on passport control queues was harming the effectiveness of anti-smuggling activity in fast parcels and reinforcing the imbalance created by the BFOM. One manager told inspectors: “The prohibited and restricted goods will still come through. That is what the public don’t realise, because the media will report big queues at Heathrow and that is the priority.”
- 5.10** Fast parcel industry representatives also felt the effect of the imbalance of immigration over customs work, as directed by the BFOM. Industry representatives reflected they felt that they are not seen as a priority and that Border Force’s attention was focused on its immigration work, with one representative stating that they feel like “a bit of a Cinderella” and that there was “more focus on the passenger side of the border”. Another told inspectors that, when there are any resourcing issues, priority is given to passengers. Furthermore, two different industry representatives informed inspectors they had been told by Border Force officers at Stansted Airport that they had not attended to examine the parcels because they had been prioritising passengers.

Border Force’s prioritisation of commodities and activities

- 5.11** Inspectors found that despite the prioritisation of commodities and activities in the BFCS, the processing of detections of lower-priority commodities could often take priority over the detection of higher-priority commodities. For example, when counterfeit goods infringing intellectual property rights (IPRs) were detected. Border Force is responsible for managing these seizures within their customs remit, but the complex procedures required to process them can prevent officers from conducting further detection work. Border Force staff told inspectors that dealing with IPR was a resource-intensive process. This involved the onerous

¹² ICIBI, ‘A short inspection of Border Force queue management at Birmingham Airport based upon onsite observations September 2021’ (published 12 January 2022), <https://www.gov.uk/government/publications/a-short-inspection-of-border-force-queue-management-at-birmingham-airport-based-upon-onsite-observations-september-2021>

¹³ In its factual accuracy response, the Home Office stated: “Staff are deployed to the Channels throughout the summer, and not just for Cat A targets. Seizure results will highlight the channel coverage provided.”

process of sending letters to, and processing responses from, both the trademark rights holder and the importer, entering the details into several spreadsheets, and recording the details on an external system called Protect Intellectual Property Rights (PIPR). Officers told inspectors that this process could take hours, particularly where consignments contained infringing goods purporting to be items from different companies.

- 5.12** The Intellectual Property Office (IPO) stated it had an excellent working relationship with Border Force, and this was also observed by inspectors during the inspection. The IPO funds several Border Force officers to work solely on IPR priorities. The activities undertaken by these officers, which related to targeting and some of the administrative processes of dealing with IPR detections, were ringfenced from operational activity. The searching of consignments for IPR remained the responsibility of operational Border Force teams, where the working order of priority seemed to be inconsistent with the BFCS.
- 5.13** While inspectors did not dispute the importance of this work – given the importance of IPR controls to protect legitimate trade in the UK and that the financial proceeds of IPR infringement are a known source of funding for organised crime gangs – the significant time taken to follow the process was time that officers were unable to deploy to search for items that were higher up the BFCS, including firearms and controlled drugs.
- 5.14** Furthermore, inspectors were told of a large backlog of cannabis detections made by the Stansted freight team. Due to resource issues, Border Force had not been able to process these seizures immediately. This backlog pointed to an organisation which was not equipped to process the quantity of prohibited and restricted goods it was detecting. One manager told inspectors: “It’s all very well saying we are going to screen everything and detect more. But once you find stuff, you have to have people there to deal with what you find.” This supported the inspectors’ findings in that once detected, processing lower-priority commodity detections overrode operational activity to detect higher-priority commodities. Resourcing will be discussed in the next chapter.
- 5.15** Inspectors found a further example whereby operational activity was not aligned to the BFOM. During interviews and focus groups, one manager told inspectors that they triaged the target list provided by the National Fast Parcels Targeting Team (NFPTT) and released packages when, in their opinion, the target was not good.
- 5.16** The BFOM does allow Border Force operational managers the latitude not to respond to category C targets in specific circumstances:
- “Border Force designated customs officials should action category C targets wherever available resource permits. Such decisions on intervention should be based on an informed assessment of the resources available to conduct mandatory checks and activity in relation to higher category targets and Control Strategy priorities.”
- 5.17** Border Force provided a document titled ‘Targeting (Air Freight and Fast Parcel) Operational Template’, which appeared to conflict with the BFOM. [Redacted]

Figure 1: [Redacted]

Category of target	Mandated response
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

- 5.18** Inspectors considered that the directions provided by this document could be open to interpretation, such as: “Full turnout expected dependent on target commodity.” Without further guidance as to what this means in respect of the target commodities, the directive that interception of category C targets is entirely at the discretion of local managers conflicts with the BFOM. Managers only have the latitude to exercise that discretion where resource levels or higher-priority activities do not permit category C targets to be progressed. Therefore, inspectors were not persuaded that the decision to deselect category C targets was driven by resource levels or wider priorities in line with the BFOM. Rather, these decisions were because of managers’ perceptions of the quality of NFPTT targets.
- 5.19** Inspectors sought clarification from Border Force as to whether the targets issued by the NFPTT are considered targets as defined by the BFOM. Border Force confirmed this was so. In light of this, it is questionable whether the decision by operational managers not to progress such targets on the basis of their perceived quality amounts to a breach of the BFOM and, therefore, whether these should be reported as breaches of the operating mandate in line with Border Force policy. Furthermore, a Border Force senior leader confirmed that the decision not to progress category C targets due to a perception of the target’s quality was incorrect and should not occur.
- 5.20** Additionally, the BFOM requires that in the event of a targeted interception, consignments must be ‘scanned’, with the results of the ‘scan’ determining whether or not an examination of the consignment should take place:
- “The consignment should be scanned and an examination should take place if the scan gives grounds for suspicion.”
- 5.21** The BFOM goes on to state that if a scanner is not available to determine whether there are grounds for suspicion, a Border Force Senior Officer (BFSO) “should decide the level of physical examination” required. Feedback must then be provided to the targeting hub, which, in the case of fast parcels targeted interceptions, would be the NFPTT.
- 5.22** Inspectors noted that there is no definition in the BFOM of what ‘scanned’ means. The BFOM does not define a particular type of scanning technology, nor a baseline standard of the quality of ‘scanning’. In this regard, inspectors did not understand exactly what was required from the BFOM. It is arguable that with a lack of clearly defined standard, Border Force officers are unlikely to understand what is required either.
- 5.23** During the onsite phase of the inspection, there did not appear to be awareness of this requirement of the BFOM. If the phrase ‘scanned’ refers to the use of x-ray technology, inspectors found that targeted fast parcels were not subject to routine x-ray scanning.
[Redacted]

- 5.24** Inspectors found no evidence that the guidance or direction of a BFSO was being sought regarding the depth of search in the absence of the use of scanning technology. Inspectors concluded that Border Force's fast parcels operations did not appear to be compliant with the requirements of Border Force's own operating mandate.
- 5.25** As a wider point, this non-compliance demonstrates that the current BFOM is not aligned with or fit for purpose in the fast parcels environment, as a decision and guidance on the depth of search required would be needed from a BFSO, meaning virtually every examination at some locations due to the lack of 'scanning' technology. Without a significant programme to introduce such technology at all fast parcel locations, the mitigation of BFSO direction is neither practicable nor workable, and points to an operating mandate in need of significant review and refresh to take account of operations in the fast parcel mode and possibly even beyond.

Threat

- 5.26** The BFOM's lack of focus on customs activity has the potential not to fully address the risk of illegitimate movement of goods at the UK border. From the outset, it was apparent to inspectors that Border Force's strategic response to fast parcels appeared not to align with the size of commercial activity in this area, and therefore, the consolidated level of risk presented to the security of the UK border. A Border Force manager stated:
- "The amount of cat C targets is 0.03% of what comes into the UK. If we pick too many, how would it look to ministers and the papers? Last year we issued 83,000 cat C targets, back in 2017/18 we issued double that. In 2015, when the team started, and so we put out lots of targets. We know it is a risk, and it is a risk every day that we are missing something."¹⁴
- 5.27** During onsite, inspectors witnessed first-hand huge quantities of parcels transiting through delivery hubs and external temporary storage facilities (ETSF). [Redacted]
- 5.28** Despite engaging with the Home Office, Border Force's stakeholders, and various open sources of information, inspectors were not able to quantify the number of fast parcels entering the UK on an annual basis. However, it was noted that the volumes of parcels being delivered were vast. In 2021, the overall volume delivered in the UK by the 'courier, express and parcel' industry was 4.1 billion parcels.¹⁵
- 5.29** Anticipating the true volume of prohibited and restricted goods entering the UK through fast parcels is a difficult undertaking for Border Force. A senior leader remarked that, in their opinion, fast parcel seizure statistics were "phenomenal". While not disputing that the number and volume of seizures is large, especially when compared with commodity volumes entering via passenger routes, as the baseline of these statistics is unknown, it is not possible to measure effort or effect without a clear understanding of overall volumes. This bigger picture

¹⁴ In its factual accuracy response, the Home Office stated: "the amount of all targets issued is approximately 0.03% of what comes in to the UK" and that "this was inclusive of A, B and C [targets]."

¹⁵ Statista, 'Courier, express and parcel (CEP) market volume in the United Kingdom from 2014 to 2021' (published 31 August 2023) <https://www.statista.com/statistics/1198054/courier-express-parcel-market-volume-uk/>. The article stated: "In 2021, according to Effigy Consulting, over 4.1 billion parcels were delivered in the courier, express and parcel (CEP) market in the United Kingdom. The study is a consolidation of the following carriers: Amazon, APC Overnight, DHL Express, DHL Parcel, DPD, DPD Local, DX, FedEx/TNT, Hermes, Parcelforce, Royal Mail, Tuffnells, UPS, Yodel and others (rest of the market)."

view is also complicated by the fact that Border Force does not maintain sufficient records of its overall effort in this area.¹⁶

Conclusions

- 5.30** The priorities outlined in the BFOM have resulted in the allocation of resources being disproportionately skewed towards immigration checks on arriving passengers and checks for radiological and nuclear threats, potentially at the expense of other critical operational priorities. There is a disconnect between the mandate's stipulations and the dynamic operational realities faced by Border Force in 2023.
- 5.31** While the operating mandate might have been established with the best intentions to support decision making and prioritise specific border activities, its mandating nature has inadvertently created a possibly myopic focus on passenger immigration checks. The lack of revisions over the past eight years has allowed this document to potentially become a barrier, rather than an enabler, of effective resource allocation and threat and risk management.
- 5.32** In his 2022 independent review, Alexander Downer concluded that the BFOM's obsolescence serves as a clear indicator that a re-evaluation is long overdue. It is imperative that Border Force recognises the pressing need to revise the BFOM, taking into account the contemporary challenges experienced by Border Force. By doing so, the organisation can allocate resources more effectively across all operational priorities, thus mitigating risks and fostering an environment that better aligns with Border Force's strategic goals.

Figure 2: Summary of conclusions

Needs improvement
The misalignment between the BFOM and BFCS has impacted Border Force's ability to manage UK border security risks in fast parcels.
The prioritisation of immigration checks over customs checks has negatively impacted resource allocation, staff's perception of their roles, staff culture, and, ultimately, the risk of prohibited and restricted goods being imported to the UK through fast parcels traffic not being detected.
Local practices relating to targets mean that Border Force may not be meeting the requirements of the Operating Mandate.
External stakeholders perceive that Border Force prioritises immigration checks over customs checks, to the detriment of the movement of legitimate goods across the border.

¹⁶ Following the inspection, Border Force provided inspectors with detail regarding the Inter-Departmental Border Delivery Board, which "exists to set the top-level strategic direction for a strong and secure border, to address significant risks that might impact on HMG objectives at the border, to provide strong and clear direction to Border Force on border priorities, and to hold Border Force to account for its performance." The first Inter-Departmental Border Delivery Board meeting took place on 10 July, and consists of representatives from the Home Office, Cabinet Office, HMRC, DEFRA, DHSC, DfT, and DBT.

6. Inspection findings: resourcing and recruitment

Staff availability

- 6.1** Closely related to the issue of prioritisation, resourcing also appeared to be an issue affecting fast parcel operations. In relation to the whole of the Central Region, a senior manager told inspectors: “I think we need to realise that our major airports are 120 full-time staff light, so we have to supplement that. We could have serious disorder if we don’t. Recruitment has let us down over the past 18 months. [Redacted] for example, is 20% light on staff and so we have to use other officers to supplement that.”
- 6.2** Other managers reported issues with the recruitment pipeline in appointing and then training new Border Force officers. One senior leader told inspectors, “I am so far behind on my recruitment,” and that recruitment was prioritised into Heathrow because “Border Force is judged through the eyes of Heathrow”. The manager did, however, acknowledge that greater recruitment into Heathrow removed the need to send Central Region staff to Heathrow in order to provide resilience.
- 6.3** [Redacted]
- 6.4** On the day of onsite observations, [Redacted] were deployed on a shift to conduct examinations. Staff and managers told inspectors that this staffing level was the norm, but because of staff absences such as sickness or annual leave, some shifts may deploy with as few as [Redacted], with the operational manager having to also deploy to comply with the health and safety requirement to have a baseline number of officers in the fast parcel operator’s (FPO) location for officer safety reasons. Given that operational teams would have to conduct up to 150 targeted examinations per shift, this staffing resource did not appear sufficient.
- 6.5** These resource issues had also come to the attention of law enforcement partners. One stakeholder told inspectors:
- “One of the key challenges is Border Force resources, which are stretched – Ukraine, Small Boats, immigration, but they have limited resource to do all of that. There are limits in what they can do in customs ... we would like Border Force to do more, but they are limited in resource.”
- 6.6** In conclusion, Border Force does not appear to have a baseline resource level for fast parcel activity or customs activity in general across Central Region. Current staffing resource levels in fast parcels appear to be inadequate to address the ongoing risk from prohibited and restricted goods, and this is further impacted by the need to reallocate staffing resource from fast parcels to other areas involved in the provision of a secure border. As well as additional resource, there may be staffing economies to address these issues by reducing the administrative burden of fast parcel examinations and the detection of prohibited and restricted goods – for example, from greater use of automation or technology.

Induction

- 6.7** In terms of the training offer for new entrants, senior managers in Central Region acknowledged: “There is too much e-learning ... the training is too short, it’s not long enough and there is no pass or fail.” Inspectors also identified a lack of planning for the induction of new entrants. Inspectors found that a group of new entrants on the Border Force apprenticeship programme were appointed at a time when no induction training courses were available. They were in post for eight months before they could receive their basic induction training, during which time there was little meaningful border security work they were able to undertake other than checks for radiological materials.

Intensifications and tactical operations

- 6.8** Border Force provided details of fast parcel intensifications and strategic operations undertaken in Central Region in the previous 12 months.
- 6.9** The summary contained details of the name and commodity targeted in 12 operations across Central Region. Two of these operations appeared to target general exports with no commodity identified, which are not within the scope of this inspection. Of the remaining operations, five targeted the highest-priority commodities, while the remaining five targeted commodities in the lower half of the Border Force Control Strategy (BFCS).
- 6.10** While there was evidence of risk testing a range of commodities, one operation at Stansted Airport appeared to be nothing more than deploying Border Force staff to undertake routine anti-smuggling activity for a range of commodities. The operational order for this intensification identified a lack of customs resourcing as a motivation for the operation:
- “Operational demands have also severely impacted the availability of Customs-trained officers able to attend Stansted freight sheds to carry out examinations.
- Overall, this has seen a daily increase of targeted parcels awaiting further examination, some of which are being delayed beyond a reasonable time frame for onward delivery by the carrier.”
- 6.11** Far from being an intensification, this appeared to be business-as-usual anti-smuggling activity, which Border Force should be properly resourcing to address the risk of prohibited and restricted goods in fast parcels, in accordance with the Border Force Operating Mandate and BFCS.
- 6.12** In conclusion, while inspectors had concerns that one of the ten intensification exercises amounted to business-as-usual anti-smuggling activity, in totality, inspectors saw evidence of Border Force organising a regular rhythm of intensification activity targeting commodities across the full gamut of the BFCS.

Figure 3: Summary of conclusions

Working well	Needs improvement
Border Force organises regular intensification activity targeting commodities across the full range of the BFCS.	Border Force’s current staffing resource levels in fast parcels appear to be inadequate, and this is further impacted by the need to reallocate staffing resource to other operational activities.

7. Inspection findings: detection methodologies

Border Force's fast parcels operational response structure

7.1 Border Force operations in relation to fast parcels are split into three distinct groupings:

- **National Fast Parcels Targeting Team (NFPTT)** is part of the Border Force Intelligence Directorate but is based in the same office as operational fast parcels staff at East Midlands Airport (EMA). The team uses data to identify potentially suspect parcels at the border¹⁷
- **operational Border Force staff** are responsible for the identification, examination, seizure, and post-seizure management of prohibited and restricted goods in fast parcels consignments at UK ports and airports
- **the Multi Agency Hub (MAH)** comprises Border Force, National Crime Agency (NCA) and Counter Terrorism Police (CT Police) officers. The hub receives and co-ordinates intelligence from a range of internal (Border Force) and external sources to inform targeting and operational staff; the hub is also responsible for receiving and disseminating seizure information to relevant parties

Across all teams, it was the general experience of inspectors that staff deployed in the area of fast parcel operations were, in isolation, dedicated to identifying prohibited and restricted items.

Targeted interceptions

7.2 The NFPTT assesses the risk of a particular consignment containing prohibited or restricted goods using 'Anti-Smuggling Networks' (ASNs). [Redacted]

7.3 [Redacted]

[Redacted]

7.4 [Redacted]

7.5 [Redacted]

7.6 Targeting staff told inspectors that the proprietary nature of the ASNs led to a variable experience when using the platforms. One of the three platforms was not networked to the Border Force intranet and obtaining parcel data from the ASN involved a laborious process of transferring data using an encrypted USB thumb drive.

7.7 [Redacted]

¹⁷ Prohibited and restricted goods are defined by section 1 of the Customs and Excise Management Act 1979 as "goods of a class or description of which the importation, exportation or carriage coastwise is for the time being prohibited or restricted under or by virtue of any enactment" <https://www.legislation.gov.uk/ukpga/1979/2/section/1>

- 7.8** The time between ASN data being available and the fast parcels arriving in the UK varied from two or more days to just 30 minutes. This placed considerable time pressure on the NFPTT to review a large number of profile matches in a limited period of time. One manager commented: “The team have around three minutes on average to look at each consignment.”
- 7.9** NFPTT resourcing consisted of [Redacted] additional Officers funded by the Intellectual Property Office (IPO) and Trading Standards. There was universal agreement across all grades in the NFPTT that an increase in staffing resource would allow targeting staff to spend more time reviewing and researching each consignment, to improve the quality of targets.
- 7.10** Targets issued by the NFPTT were disseminated to the front-line using a spreadsheet saved on a shared drive. This spreadsheet was not held on a collaborative working platform, such as SharePoint, and could not be co-authored, meaning it could only be edited by one individual at a time. A senior Border Force manager told inspectors that this was a particular issue in providing feedback on targets. The limitations of the spreadsheet resulted in feedback not always being provided in a timely manner. Timely feedback is important in allowing the NFPTT to review and improve their approach so that future targeting opportunities are not missed, especially where new trends or methodologies of importing prohibited and restricted goods are identified.
- 7.11** [Redacted]

Figure 4: Border Force target classifications

Category		Description
[Redacted]	[Redacted]	
[Redacted]	[Redacted]	
[Redacted]	[Redacted]	
[Redacted]	[Redacted]	

- 7.12** While inspectors saw well-evidenced and justified grounds for targeting consignments, (for example, previous seizures, intelligence from other agencies and sources), in some cases the justifications for targeting a consignment were less robust. Border Force provided its training documents which demonstrated the criteria used to target consignments. [Redacted]
- 7.13** [Redacted]. The same manager was alive to the possibility that misunderstandings or misconceptions may drive targeting behaviour, and they were keen to monitor targeting activity to prevent this from happening.
- 7.14** The manager gave an example where a newer member of staff had held a consignment, and, due to their level of experience, did not understand that data could be reviewed at a more granular level to understand what was in the consignment. The manager reviewed the decision and decided to release the goods, while also explaining to the member of staff why the consignment should not have been targeted, and how the full range of information would assist them in generating future targets.
- 7.15** Inspectors found a culture in the targeting team where officers were encouraged to raise concerns if they felt something was not right or a management decision, such as releasing goods following the review of a target, was incorrect. Part of this process involved officers providing daily situation reports to their managers regarding their duties, an element of which

was an opportunity to raise matters of conscience and concern. Officers told inspectors that they felt safe and confident to challenge their managers if they felt that something was not right.

7.16 [Redacted]

7.17 [Redacted]

Figure 5: [Redacted]

Port	Category A			Category B			Category C			All targets		
	Targets	Seizures	Seizure rate	Targets	Seizures	Seizure rate	Targets	Seizures	Seizure rate	Targets	Seizures	Seizure rate
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

7.18 The disparity in the number of targets issued and resulting seizures may well reflect the volume of fast parcels arriving at each port. However, inspectors noted that the proportion of detections did not correlate with the number of targets issued. Notwithstanding this, a lower proportion of seizures at a location with a high volumes of fast parcel traffic will result in a larger number of seizures when compared with a low-volume location.

7.19 [Redacted]

7.20 [Redacted]

Figure 6: [Redacted]

Category of target	Number of seizures	Percentage of total targeted seizures
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]

7.21 [Redacted]

The relationship between the targeting team and operations

7.22 During onsite observations, and in subsequent interviews, inspectors observed a clear divide and tension between operational front-line teams and NFPTT staff. Despite both teams being based in the same office, inspectors saw little day-to-day interaction between the teams, and members of both teams relayed difficulties in their working relationship.

7.23 Several operational officers told inspectors that the NFPTT's reasons for issuing category C targets were often generic, with a 'copy and paste' of the same reasons cited for multiple consignments. In reaching this conclusion, the officers attached weight to the fact that many of the reasons for targeting were identical, including the same spelling errors.

7.24 NFPTT managers were aware of these concerns and told inspectors they were committed to resolving them. One manager said:

"I am trying to get this [copy and pasting] addressed in monthly one-to-ones with the officers ... but when we write too much, we are told we are telling people [operational staff] how to do their jobs."

7.25 Both officers and managers in targeting identified that, at a senior level, engagement between the teams is good, but there were issues at Border Force Assistant Officer and Border Force Officer level, particularly with longer-serving, legacy-customs staff. Targeting team staff also articulated to inspectors that some operational staff at EMA do not understand that the NFPTT has a national remit, with a focus on fast parcels activity at all ports, whereas the focus of operational staff at EMA is usually focused on local issues.

7.26 Inspectors also found that the operational officers' perceptions of the quality of the target directly influenced the depth to which a particular consignment was searched. Officers told inspectors that for category C targets, they would have a cursory glance at the consignment,

and if nothing immediately presented to raise their concerns, they would move on to the next parcel.

7.27 Operational managers supported this approach, telling inspectors that: “For category A and B targets, they check everything. For category C it is until they are satisfied, such as [Redacted]” Inspectors were concerned that this inconsistent approach to searching, which was overtly accepted by operational managers, may lead to prohibited and restricted goods being missed. This in turn had the potential to undermine the whole purpose of the NFPTT targeting consignments in the first place.

7.28 A manager in the NFPTT explained to inspectors the difficulty in obtaining balance in category C targets:

“The cat C targets are always the elephant in the room – always people see it as too many or not enough ... the amount of cat C targets is 0.03% of what comes into the UK. If we pick too many, how would it look to ministers and the papers ... Our focus now is to risk test the highest-priority commodities from the Control Strategy.”¹⁹

7.29 In conclusion, it was clear to inspectors that the relationship between operational and targeting teams was neither constructive nor collaborative and was harming Border Force’s effectiveness in identifying prohibited and restricted goods at the border. Negative behaviours and entrenched attitudes regarding category C targets may be harming operational efficiency, while statistical data supports the contention that most targeted seizures arise from category C targets.

Depth of Search and transport of goods

7.30 At EMA, inspectors observed that Border Force staff conducting searches at fast parcels locations would conduct their search until such point as any prohibited or restricted goods were identified, or until they were satisfied there were none. Once prohibited or restricted goods were identified, officers stopped the search and transported the goods back to the Border Force office. This necessitated the carriage of the goods in an official vehicle through airport security if the Border Force office was airside (such as at EMA). A more thorough examination would then be conducted in the customs channels at the Border Force office.

7.31 Inspectors had concerns that this may present chain of evidence issues if further prohibited and restricted goods were identified in a subsequent examination, especially at EMA, where there was a local agreement that airport security staff could open Border Force vehicles to view items seized as liable to forfeiture.²⁰

Health and safety issues around transportation of seized or detained goods

7.32 Inspectors were concerned that, from a health and safety perspective, officers had not established full content of consignments before transporting them in an official vehicle at their own risk. Inspectors witnessed officers detect consignments of khat, herbal cannabis,

¹⁹ Commodities which might have a higher priority include class A drugs, cash and listed assets, lethal firearms, knives subject to customs controls, offensive weapons and non-lethal firearms.

²⁰ The Border Force ‘Searches of Border Force staff by port security staff’ policy states: “Border Force vehicles or areas of vehicles may be exempt from a search in the following circumstances ... compartments of vehicles carrying evidence or seized items.” Items seized by Border Force under CEMA 1979 are seized as they are “liable to forfeiture to the Crown”. This means that items seized as improperly imported become the property of the Crown and may be disposed of at the Crown’s discretion.

and cigarettes.²¹ Officers did not fully examine the parcel beyond sight of the prohibited or restricted goods to confirm whether there were other prohibited or restricted goods, or goods that posed a health and safety risk, within the consignment.

- 7.33** Border Force staff told inspectors that they had previously encountered hazardous substances such as fentanyl in the course of their duties, exposure to which could pose a risk to the health, safety, and welfare of Border Force staff, stakeholders, and the wider public.
- 7.34** At an offsite external transit storage facility (ETSF), officers seized a sealed box without opening it, x-raying it, or confirming the contents. Inspectors raised concerns with the officers that they were placing themselves, their colleagues, and the public at risk by putting a box with unknown contents in their vehicle and transporting it back to their office. The officers rejected this, stating that the box would be placed in the back of their vehicle and they would seal it in a bag. Inspectors were not persuaded that this would be sufficient mitigation if the box contained unidentified hazardous items.
- 7.35** Inspectors raised these concerns with operational managers and staff at the time, who stated there was little alternative but to adopt their current methodology. One officer told inspectors they could not leave items in situ at the operator's depot. One manager described it as "the best of a bad job".
- 7.36** Inspectors did not accept this point of view. Under the Health and Safety at Work Act 1974, employers are responsible for the management of risks which may impact the health, safety, and welfare of employees and other people who may be affected by an employer's activities.²²
- 7.37** Inspectors concluded that Border Force's current operational approach could be considered as negligent of the potential health and safety risks, as officers may be unwittingly transporting hazardous articles on public roads and into the secure zone of international airports due to a failure to establish the contents of a consignment before transport. Such articles would not be subject to security screening when entering the secure zone of an airport, and there was a clear risk to the wider public if the consignment did contain hazardous substances and was opened in a passenger environment at the airport, or the vehicle transporting the goods were to be involved in an accident. Inspectors found little awareness of the seriousness of the risks and a lack of appetite to improve current arrangements to mitigate those risks.
- 7.38** Additionally, inspectors were not satisfied that the decision to seize, rather than detain the box, was an appropriate use of a Border Force Officer's powers, given the contents were unknown.²³ Officers did not know what the unopened box contained, and it was questionable whether officers could, therefore, hold a reasonable belief that it contained prohibited or restricted goods liable to seizure. Detention would therefore have been a more appropriate course of action, since the purpose of seizing the box was to take it back to a Border Force office to establish the contents.

21 Khat is a stimulant drug (containing two cathinone-like compounds) and has effects similar to mild amphetamine. (<https://www.drugwise.org.uk/khat/>)

22 <https://www.hse.gov.uk/legislation/hswa.htm>

23 Border Force's 'Customs – the basics' guidance states that: "Section 139(1A) CEMA, is a provision that allows Border Force to detain things where a customs official 'reasonably suspects' that something is liable to forfeiture. It can be used where a Customs Official does not yet have sufficient evidence to establish definitively that goods are liable to forfeiture as a matter of law but where they nevertheless want to detain the goods for a limited period, for example to make further enquiries."

Accommodation issues

- 7.39** During onsite observations, inspectors found that the accommodation available to Border Force staff at the fast parcels locations observed was inadequate.
- 7.40** At East Midlands Airport (EMA), inspectors saw first-hand accommodation that was cramped, with insufficient space for the number of staff using the facilities, especially at shift handover times. For example, a shift briefing for an incoming team had to be conducted in a locker room because there was no other space to undertake the briefing. This was partly compounded by the fact that the freight team is now a dedicated team and has expanded in size from the original calculations for trader-provided accommodation.²⁴
- 7.41** In addition, the location of Border Force fast parcels team accommodation at EMA in an airside location was problematic to the operation. Transferring seized goods to or from Border Force accommodation required staff and goods to pass through airport security, which was a time-consuming process. As discussed in chapter 10, the airside location presented issues for the transfer of seized goods from the Border Force office to the King's warehouse.
- 7.42** The examination facilities provided by fast parcel operators varied in quality. Inspectors observed four such facilities during the onsite phase of the inspection:

Location 1 was the most recently established accommodation in a partitioned section of a warehouse and was identified as “good quality examination facilities” by a senior manager. Inspectors considered this location adequate at best, consisting of a cupboard, worktop-type examination benches, a fume cupboard, and a locker for tools and other items. There was a member of fast parcel operator staff present while examinations took place.

Location 2 was an open area in the corner of a warehouse consisting of an ullage cage and an examination worktop. Border Force activity could be observed by anyone working in the shed, and there did not appear to be any storage facilities for equipment beyond the ullage cage. This area appeared inadequate for the purposes of customs examination.

Location 3 was a self-contained office within a warehouse, with a further self-contained office which could only be accessed by Border Force. Border Force equipment could be stored in the inner office and there was also access to an ASN terminal. Housekeeping was clearly an issue in this area. It was dirty, untidy and disorganised.

Location 4 was at the offsite external facility covered by a team from Birmingham. The Border Force team had no dedicated facilities beyond an ullage cage in which to store seized items. There were no dedicated Border Force examination facilities, with officers required to examine either items in plain sight of fast parcel operator staff or take the item back to the Border Force office, some 30 minutes away, for examination.

- 7.43** When asked to identify the main challenges facing the operation, operational and senior managers invariably identified accommodation as an issue.

It is accepted that Border Force are, to some extent, dependent on stakeholders to source and provide adequate accommodation – both for the conduct of day-to-day Border Force activity, but also to allow for the safe and secure examination of consignments at FPO premises. Border

²⁴ Trader-provided accommodation is provided free of charge to Border Force by port and airport operators for the purposes of immigration or customs control.

Force is responsible for effective housekeeping and organisation of such facilities, and the facilities seen by inspectors were poorly maintained and disorganised.

- 7.44** In conclusion, the facilities observed by inspectors during the onsite phase of the inspection were unsuitable for the conduct of Border Force's operations, both in terms of facilities and working space. This in turn has the potential to harm the effectiveness of Border Force operational activity, as safe and effective examination and working facilities that are fit for purpose are an essential requirement for an effective border control operation.

Health and safety issues arising from the handling of firearms

- 7.45** Border Force has a cadre of trained 'Make Safe Officers' (MSOs) able to handle and render safe legitimate and illegitimate importations of firearms. Border Force policy states that anything suspected to be a firearm may only be handled by a Make Safe Officer.
- 7.46** Two key assurance indicators in the Border Force assurance expectations are the requirement for enough staff to have received MSO training to meet the business need; and, that MSOs are available whenever required.
- 7.47** During this inspection, inspectors found that there were gaps in MSO coverage at EMA, due to absences such as annual leave. While there was a contingency for Border Force to contact the police in this scenario (for which there may be a financial charge), there were clear skills gaps presenting a health and safety risk if firearms could not be handled and made safe by a suitably trained officer. Given the proximity of this inspection to an ICIBI inspection of Border Force firearms procedures, inspectors remitted this matter for consideration as part of that inspection.²⁵

Commodity referrals from fast parcel operators

- 7.48** Border Force provided an overview of the process for fast parcel operators (FPOs) to notify Border Force of suspect parcels. [Redacted]
- 7.49** [Redacted]
- 7.50** Feedback from FPO stakeholders regarding Border Force's responsiveness to such referrals was positive. One stakeholder told inspectors: "It's really good. If we make a referral, we tend to get a response back in minutes or hours. They are pretty decisive whether they want to look at it or not."
- 7.51** [Redacted]

Commodity referrals from law enforcement partners

- 7.52** Referrals from law enforcement partners, such as His Majesty's Revenue and Customs, the Medicines and Healthcare products Regulatory Agency (MHRA), NCA and the police are routed through the Multi Agency Hub (MAH).

²⁵ In its factual accuracy response, the Home Office provided the following additional information: "There is an additional contingency in that the Passenger Team also have MSOs, and the 2 sides of the house share this resource."

- 7.53** Inspectors spoke to several of Border Force's law enforcement partners during the inspection, and all were positive regarding Border Force's responsiveness to taskings or intelligence.
- 7.54** Border Force's law enforcement partners acknowledged that Border Force was an organisation with limited resources, which was perceived as impacting the effectiveness of Border Force's ability to find commodities within the individual remits of the various organisations' concerns. Stakeholders in this capacity accepted that it was a matter for Border Force to allocate those limited resources to address what Border Force considered to be its strategic priorities, or priorities set by Home Office ministers.
- 7.55** In conclusion, Border Force's responsiveness to law enforcement partners was largely positive.

Self-selection

- 7.56** Self-selection is the identification of goods for examination at the discretion of individual officers, based upon an officer's self-identified reasons for selection. In terms of the capacity to self-select, operational managers told inspectors that self-selection sat behind other activities in the 'order of battle'. Conducting checks to find radiological substances was the priority, followed by dealing with targets, and then followed by self-selection.
- 7.57** During focus groups and observations, both officers and managers told inspectors that they perceived self-selection to generate better results than intelligence-led targeting. Border Force provided a PowerPoint presentation summarising the findings of a Home Office Analysis and Insight (HOAI) internal review: 'Analysis of Performance and Productivity of Self-Selection and Targeting Activities at the Border', which was produced in November 2022.
- 7.58** This Home Office internal review considered the percentage of positive detections across various modes as a percentage of all interventions, against the number of officer hours spent on this activity. The internal review considered customs data from airfreight, fast parcels, air passenger traffic, and maritime freight between 2012 and 2018. It was not clear to inspectors which ports the data related to.
- 7.59** In its internal review, the Home Office found the following:
- Self-selection has significantly higher success rates than targeting for fast parcels
 - Although more hours are spent on self-selection, this is sensible based on the higher success rate
 - Success rates for self-selection have been consistently high, at around 20%
 - Success rates for targeting are a lot lower, with around 9% for category A and B targets, and 4% for category C targets
 - Hours spent on self-selection are around five times more than those spent on targeting
 - there does not seem to be any correlation between hours spent and success rate across self-selection, category A and B targets, and category C targets
- 7.60** While this report did provide some evidence that self-selection was more productive in generating seizures when compared with targeting, inspectors considered that this conclusion was heavily caveated, given the quality of the evidence base. The caveats in the presentation note that there is the potential for human error, human bias, the break between EU and non-EU traffic, and that the analysis considered the number of seizures rather than quantity of

goods seized. For example, one cigarette seizure of 50,000 cigarettes was given the same weighting as the seizure of one pepper spray.

- 7.61** Furthermore, this report was based upon historical data from before EU exit and the Coronavirus (COVID-19) pandemic. Both events had a significant impact on the volume of fast parcels entering the UK and the UK's customs processes. The report does not consider those impacts, which may well have influenced the effectiveness of self-selection versus targeted interception.
- 7.62** Inspectors noted that the success rates for targeting in this report were significantly lower than the results for the NFPTT outlined in Figure 6.
- 7.63** In the case of smaller fast parcel operators, Border Force staff have little option but to self-select consignments for examination. [Redacted]. One senior manager told inspectors: "My officers go in blind, and are successful, but I've got officers that are experienced. The next group might not be so good."
- 7.64** Self-selection of a particular consignment is, therefore, based upon the officer's observations of parcels, such as the packaging and label on the item, as well as their perception of the weight of the parcel (though this may be aided by the inclusion of the weight on the packaging).
- 7.65** Activity observed by inspectors at one external temporary storage facility (ETSF) was focused on HGVs arriving from a specific country perceived to be a source country for drugs, which inspectors heard was the normal approach taken. Inspectors were concerned that Border Force's modus operandi may become well known in this regard if organised crime gangs had members embedded in this location, and this insider threat risk could harm operational effectiveness if Border Force's operational approach became predictable.
- 7.66** It was not possible for inspectors to draw firm conclusions about the efficiency and effectiveness of self-selection as a means of identifying prohibited and restricted goods in fast parcels in isolation. Inspectors did, however, identify areas where Border Force's approach and practices had the potential to diminish their operational effectiveness.

Figure 7: Summary of conclusions

Working well	Needs improvement
Border Force staff were, in isolation, enthusiastic and dedicated to identifying prohibited and restricted items.	The relationship between operational staff and the NFPTT was limiting Border Force's effectiveness in identifying prohibited and restricted goods at the border.
The work of the NFPTT was beneficial to the efficiency and effectiveness of identifying prohibited and restricted items in fast parcels.	Operational staff had negative views and saw limited value in relation to category C targets but data showed that they were generating results, with almost half of all targeted seizures arising as a direct result of category C targets.
FPOs were proactive in referring suspect consignments to Border Force and were also satisfied with Border Force's responsiveness to these.	Border Force were transporting consignments without fully confirming what they were dealing with, which posed both legal and health and safety risks.
Border Force's responsiveness to law enforcement partners was largely positive.	It was not possible for inspectors to draw conclusions about the efficiency and effectiveness of self-selection, but there were areas where Border Force's approach and practices had the potential to diminish their operational effectiveness.

8. Inspection findings: detection equipment

Types of equipment

- 8.1** There are currently four main types of detection equipment available to Border Force fast parcels staff when searching for prohibited and restricted goods. These are summarised in Figure 8.

Figure 8: Types of detection equipment available for Border Force staff at fast parcels locations

Equipment	Description
X-ray screening equipment	Portable or fixed equipment that allows officers to examine the contents of a consignment externally using radiation that passes through the consignment.
Portable chemical detection equipment	This handheld equipment allows for the identification of suspected controlled drugs or other substances in an opaque container without exposing the contents.
Fixed trace detection equipment	This equipment, which weighs around 15 kg, identifies traces of controlled drugs by analysing samples taken by means of a swab.
Drug field tests	These tests consist of small plastic wallets containing vials of liquid. Samples of suspected controlled drugs are placed in the wallet and the vials broken to expose the contents to the suspected controlled drug. A specific colour shift indicates the presence of controlled drugs. Specific field tests must be used for different types of controlled drug – so for example, an opiates field test will not indicate cannabis.

Border Force staff also have access to ancillary equipment, such as fume cupboards, for the examination of substances which may be hazardous.²⁶

- 8.2** The technology used by Border Force provides an indication that the goods are likely to be prohibited or restricted to justify any decision to seize the goods under section 139 of the Customs and Excise Management Act 1979 (CEMA 1979), or to provide reasonable grounds for arrest under section 138 of CEMA 1979.²⁷

²⁶ Fume cupboards are transparent sided cupboards, which can be sealed and have air extraction facilities. They are used by Border Force staff to isolate potentially hazardous substances.

²⁷ Customs and Excise Management Act (CEMA) 1979, section 49, <https://www.legislation.gov.uk/ukpga/1979/2/section/49> CEMA 1979, section 139, <https://www.legislation.gov.uk/ukpga/1979/2/section/139> CEMA 1979, section 138, <https://www.legislation.gov.uk/ukpga/1979/2/section/138>

Equipment management

- 8.3** In 2017, Border Force introduced a programme team known as the 'Detection Services Portfolio' (DSP) to bring strategic and national management to Border Force's detection capability and improve detection equipment available at port. DSP's principal aims are to:
- “deliver step-change in Border Force's detection capability, through a coordinated strategic and consistent approach to detection by delivering Improved Detection Technology, Improved Data, Improved People and Processes and Improved Infrastructure.”
- 8.4** Border Force told inspectors that procurement, finance, management, and maintenance of detection equipment is the responsibility of different Border Force business areas:
- **Detection Services Portfolio** is responsible for the finance, kit development, project management, and procurement phases for allocated projects only (e.g., not all detection equipment procurement is the responsibility of DSP. For example, drug field testing kits and fume cabinets are not)
 - **Detection Capability Team** in Border Force National Operations Headquarters (NOHQ) is responsible for business ownership and management of equipment
 - **Border Force Operational Logistics** is responsible for contract monitoring
- 8.5** Beyond this basic structure, there is a further dispersal of responsibilities among each team. For example, DSP has responsibility for procurement and purchase, but once live, trace detection equipment and portable x-ray equipment deployment management is overseen by NOHQ. Similarly, once DSP procurement is concluded, management of live x-ray equipment is overseen by a National Scanner Management Team, who also sit within NOHQ.
- 8.6** The current structure appeared complex, with different parts of Border Force responsible for different aspects of detection equipment through the lifecycle of that equipment – through commercial horizon scanning, tendering, procurement, training, deployment, maintenance, and end-of-life replacement and disposal. When questioned as to the effectiveness of this seemingly disparate approach, a member of staff told inspectors: “I think the current model works, but that is subjective. A single central unit might help – it would reduce hand-offs [to other areas of Border Force], we might lose expertise.”
- 8.7** The current arrangements appear needlessly complex, which has the potential to impact the efficiency and effectiveness of detection equipment procurement, supply, maintenance, and disposal.

Perceptions of equipment

- 8.8** Border Force provided a 2022 document, 'As Is Examination Technology. Operational insights of Border Force examination and detection equipment', a report based on operational insights of Border Force Officers reflecting on technology performance across technologies and all modes, including those beyond fast parcels.
- 8.9** In summary, the report found:
- “Officers believe that examination equipment provided has a high Operators Effectiveness Assessment of 80% to 100%. However, in some key Goods examination technology there is both lower confidence 60% to 80% and low data fidelity which needs to be resolved.

Officers consider examination equipment in the main as being either Essential or Adding Significant Value and equipment has high levels of Reliability with availability rates of 80% to 100%. Repairs and Maintenance contracts is the area that requires some improvements with contracts for key examination equipment being rated either Satisfactory or Poor.”

- 8.10** Inspectors did not consider that this assessment reflected the effectiveness or perception of the detection equipment available to Border Force staff working in fast parcels operations. There were significant issues with the availability, accessibility, quality, serviceability, and officer confidence in using the equipment available. A senior Border Force manager told inspectors during this inspection: “The technology is not fit for purpose, and no one in the organisation will disagree.”
- 8.11** During the onsite phase of this inspection at East Midlands Airport (EMA), and at an offsite external temporary storage facility (ETSF), inspectors spoke with staff and observed their use of detection equipment during examinations.
- 8.12** Inspectors did not see a single successful use of detection equipment, beyond the use of drug field tests, to screen a fast parcel or either positively or negatively identify a questioned substance. Equipment was either broken, not available, or untrusted. In a subsequent interview, when asked for their assessment of detection equipment available to Border Force, a senior Border Force manager said: “I think it is poor across the organisation. The Downer report referenced the ageing equipment.” Given the current state of detection equipment in Border Force’s fast parcels operations, inspectors had some difficulty in establishing what, if anything, of value had been improved in respect of detection equipment since the establishment of DSP five years previously.
- 8.13** In his report, ‘An independent review of Border Force’, Alexander Downer identified concerns regarding capability of technology available to Border Force staff:

“... there were significant capability and technology disparities between ports. ... I encountered a number of locations where there were obsolete items and either no plan to fix them or staff having to spend a disproportionate amount of time trying to resolve the issue. This takes them away from front-line work.”²⁸

Inspectors drew the same conclusions based on this inspection.

Training

- 8.14** Inspectors requested details of the training regime in place for the various types of detection equipment used by Border Force across the Central Region. It was clear that training on detection equipment is not integrated into Border Force’s induction programme.
- 8.15** In all cases, ports reported that a small number of officers would attend training where this was available, and training on the use of detection equipment was then ‘cascaded’ to other staff.²⁹ One manager with responsibility for detection equipment nationally told inspectors: “Training is normally done locally and cascaded from experienced to new staff. It’s always been done that way.”

²⁸ Home Office, ‘Independent review of Border Force’ (published 20 July 2022), <https://www.gov.uk/government/publications/independent-review-of-border-force>

²⁹ For new Border Force staff, use of detection equipment is not covered during the classroom element of their induction training. Training on equipment was ‘cascade trained’ by the inductee’s mentor explaining, demonstrating, and supervising the use of the equipment during the mentoring period. For new staff, the roll-out of new or updated equipment would involve a small number of staff being trained on the new equipment, with those officers then training other colleagues in the use of the equipment.

- 8.16** While some equipment was provided with the training from the manufacturer, DSP staff told inspectors that this was generally unsuitable for use in Border Force given the costs and the number of people requiring training:
- “We purchased one supplier-led course per device but need provision for ongoing training. We are spending a lot of money ... We quickly realised supplier training was not sufficient, so we brought it in-house, which was cheaper and better.”
- 8.17** The DSP team told inspectors that a trace detection e-learning package was available on Border Force’s training platform. Front-line Border Force staff did not mention this package, with all citing cascade training as the only means of training for this equipment.
- 8.18** Inspectors asked the DSP team whether ‘cascade training’ was sufficient. A member of the team said:
- “It depends on the equipment. With trace [detection equipment] it’s sufficient to have a superuser to cascade the training. There could be more ongoing support for officers but that would need to be balanced with cost.”
- 8.19** Inspectors found no evidence of a consistent, structured, and ongoing programme of refresher training in relation to detection equipment, though this was an aspiration for the future.
- 8.20** The same manager told inspectors that there was a risk that cascade training may become “watered down” over time. Experienced officers may leave the organisation and the experienced officers delivering the training may well have received their training “fourth- or fifth-hand”, particularly where the equipment is old or end-of-life.
- 8.21** Given the importance of this technology in Border Force’s fast parcels activity, inspectors found that there was not a structured ongoing training programme to support officers to use the equipment confidently, competently, and safely. Inspectors found no evidence of any assurance measures to ensure that cascade training was delivered in a consistent manner to an expected standard.
- 8.22** In conclusion, inspectors found that training on detection equipment was not integrated into the Border Force training programme for new entrants, nor was there an ongoing programme of refresher training. Training was delivered on a piecemeal basis by well-meaning, experienced staff, in a manner which did not instil confidence that training would be consistent across commands.

X-ray screening equipment

- 8.23** During the onsite phase of the inspection, the only fixed x-ray unit for Border Force’s sole use at EMA was in the passenger customs channels in the main airport terminal.³⁰ This unit was remote to all the fast parcel operator sheds and using it would require the consignment being taken through airport security in a Border Force vehicle to the main terminal building for examination, which did not appear an efficient means to access x-ray technology.
- 8.24** However, the x-ray unit in the passenger channels was broken and not in operation at the time of the inspection, with no defined timescale for repair or replacement. One manager told

³⁰ Customs ‘channels’ are the area of airports and seaports where the travelling public enter to make a tacit declaration of goods to declare or nothing to declare. The search area where Border Force search passengers’ belongings at ports of entry are referred to as the ‘Customs channels’.

inspectors: “I am frustrated. We haven’t had a working x-ray for nine months. The machine is 23 years old, and the parts are obsolete.”³¹

8.25 In some instances, Border Force were able to ask to use fast parcel operators’ (FPO) x-ray equipment to scan consignments. FPOs would have to load the consignment onto the belt and operate the machinery, and the Border Force Officer’s role would be restricted to looking at the screen. Border Force said:

“BF officers do sometimes utilise the shed operator’s equipment for their detection purposes ... This is done on the goodwill of the transit shed operator.”

8.26 Inspectors were concerned that stakeholder goodwill could be withdrawn at any time, and there were potential insider threat risks if x-ray equipment was operated by a third party. At one FPO, security staff were only available at certain times. Outside of those hours, Border Force was required to provide one hour’s notice if they wanted anything x-rayed. Improved x-ray capability would significantly assist Border Force in identifying prohibited or restricted goods.

8.27 Inspectors saw officers using tools to dismantle an item, a process which took considerable time. Officers told inspectors that were they to have the use of an x-ray, they would have been able to examine the item in less time and without potentially causing damage when taking it apart, and therefore avoiding potential cost to the taxpayer.³²

8.28 Another officer told inspectors that they had worked at a King’s mail postal hub for Border Force, where all items are subject to x-ray. The officer felt that there was a missed opportunity for Border Force to screen all fast parcels consignments via x-ray in order to identify prohibited and restricted goods in fast parcels in a more efficient manner.³³

8.29 Border Force has access to handheld x-ray equipment, but opinions on the effectiveness of this equipment varied. One manager told inspectors that the feedback from staff was not positive. A member of staff with experience of using the equipment told inspectors that the handheld x-ray could be useful, but it did have limitations. It could not be used in an area where there were a lot of people working, as there would be a risk of exposing anyone behind the item being x-rayed to radiation. It cannot be used in an area where there was a lot of clutter behind the item being x-rayed.

8.30 A manager on the operational team deploying to ETSFs told inspectors that the handheld x-ray simply could not be used in that environment, as it was too busy with a lot of footfall. Inspectors were not clear why this equipment could not be used in the ullage cage reserved for Border Force’s sole use at the location visited.³⁴

31 In its factual accuracy response, the Home Office provided the following additional information: “DSP report that a new x-ray machine has been ordered (for EMA Customs Channels), with installation due this autumn.”

32 In its factual accuracy response, the Home Office provided the following additional information: “An additional x-ray deployment requirement is being evaluated for EMA Freight.”

33 In its factual accuracy response, the Home Office provided the following additional information: “It should be noted that postal traffic is imported into the U.K. through two Border Force controlled import postal Hub ‘pinch points’ (as opposed to central region’s up to 199 3rd party operated ITSF/ETSFs transit sheds). In addition, only mail from countries that BF puts ‘on check’ is presented to officers for search. Not all international mail is screened at mail hubs.”

34 An ullage cage is a secure cage in a warehouse used to store seized or detained goods pending transfer to a Border Force office.

- 8.31** The DSP team did not appear to be aware that the handheld x-ray equipment was already being used at fast parcels locations. A member of the team told inspectors:

“We have not yet rolled out handheld in the fast parcels environment due to the safety aspects. You need a cordoned zone, there’s lots of people around, and we don’t own the zone.”

In ETSFs, the controlled bonded customs zone could be a small portion of the whole transit shed. This could make it difficult for officers to set up a required controlled radiological cordon.

- 8.32** However, during onsite observations and in focus groups with inspectors, Border Force staff related their experiences of using this equipment, which may have been from shift deployment in other modes to FPO.
- 8.33** Nevertheless, none of the teams observed by inspectors during the onsite phase of the inspection deployed to FPO locations with the handheld x-ray. It did not appear to be standard operating procedure to deploy with this equipment, and it would necessitate a round trip to the Border Force office (which would involve having to go through airport security) to obtain the equipment. This was not a particularly efficient or effective way to conduct a customs control.

Equipment maintenance

- 8.34** Inspectors found that at a national level, Border Force operations had been adversely affected by difficulties with the maintenance and procurement of x-ray equipment. One of Border Force’s preferred suppliers had withdrawn from the UK, which rendered many of the existing x-ray units ‘end-of-life’ products, with no means of renewal or maintenance. Most of the x-ray equipment used by Border Force was between 10 and 20 years old, and significantly inferior to modern equipment in terms of imaging capability, network capability, image storage capability, and equipment uptime. Border Force reported severe challenges beyond its control in acquiring new scanning equipment.
- 8.35** A Border Force manager with responsibility for x-ray equipment told inspectors that nationally there are a large number of broken x-rays and scanner vehicles that are unusable. The same manager described their work as “Project Frankenstein”, as a significant amount of their time was taken with recycling parts from broken x-ray equipment to repair other machines.
- 8.36** While x-ray equipment was being redeployed between locations where there was a business need to do so, in some cases there was a reluctance to move some of the more aged equipment, because “it could cause more harm than good. For example, you could unplug it and it might not work when you plug it back in.”
- 8.37** Border Force had allocated a Senior Officer and a Higher Officer to manage x-ray equipment across the 53 staffed Border Force locations across the UK and in Coquelles in northern France.³⁵ Given the importance of x-ray equipment in Border Force fast parcels operations, as well as wider customs operations, the resource invested in this activity did not appear sufficient.

³⁵ A Senior Officer is the equivalent of a Civil Service Senior Executive Officer. A Higher Officer is the equivalent of a Civil Service Higher Executive Officer. For more information on Civil Service grades, see Institute for Government, ‘Grade structures of the civil service’ (published 23 November 2017), <https://www.instituteforgovernment.org.uk/explainer/grade-structures-civil-service> Number of staffed ports of entry taken from the Border Force command boundaries map, excluding juxtaposed controls other than Coquelles. Coquelles is the only juxtaposed control where Border Force undertakes customs activity.

- 8.38** Furthermore, while these individuals had a strong operational background, including extensive use of x-ray and scanner equipment, neither had received any formal training from Border Force in the technicalities of x-ray equipment – both were in effect ‘self-taught’.
- 8.39** A stakeholder working closely with Border Force drew a comparison between Border Force’s approach to fast parcels and the approach to fast parcels by the control authority in a G20 country:
- “They scan everything and they have about 200 people sitting in a room looking at x-ray images and deciding whether to target them and that way they are in control.”
- 8.40** In the post-pandemic world, the volumes of fast parcels entering the UK are vast, and to be at all effective in detecting prohibited and restricted items, Border Force must have the capability to screen those parcels on a scale that is sufficient and representative. Inspectors concluded the current deployment of x-ray equipment in Border Force’s fast parcels operations is a long way from being sufficient. This in turn has a negative impact on the operators and users of fast parcels services, as the lack of x-ray equipment is hindering Border Force’s ability to facilitate the legitimate movement of goods, while identifying items which may cause harm.

Fixed trace detection equipment

- 8.41** Fixed trace detection equipment was not available at any of the fast parcel operator locations visited by inspectors during the onsite phase of this inspection. Inspectors asked officers how they conducted trace detection tests of consignments at these locations, given the lack of equipment. One officer told inspectors: “If we need to swab [conduct trace detection tests on] an item, we put it in the van, take it back to the office and swab it in the channels.” Officers deploying to the offsite ETSF said that they would adopt the same approach.
- 8.42** This appeared to be an inefficient and time-consuming approach, taking from 30 minutes upwards. Trace detection equipment provides officers with an indication of even small amounts of controlled drugs. Transporting consignments back (and forth when examinations conclude a consignment is legitimate), in some cases through airport security, did not appear to be an effective use of Border Force time.
- 8.43** During interviews and focus groups with Border Force staff, it was also clear that they had an inherent mistrust of the accuracy and viability of some of the trace detection equipment procured by Border Force. For example, at EMA, staff told inspectors: [Redacted]
- 8.44** Day-to-day maintenance of the fixed trace detection equipment was also reported as an issue, especially given the staffing resource levels in the fast parcels operation. During a demonstration of the equipment available at EMA, officers told inspectors their understanding was that trace detection equipment at EMA was broken as it had been stored in a location that was not suitable (high temperatures had damaged the equipment), nor had the necessary daily maintenance routine been upheld. One manager told inspectors: “The machines require a lot of time of my staff. Like a daily cleaning. If you don’t do it, they don’t work, you have to get them maintained.”
- 8.45** DSP were aware of the limitation of fixed trace detection equipment and highlighted that one of their aspirations was to procure:

“mobile equipment – light, deployable equipment – trace detection equipment weighs 15 kilos. In future, we hope to have tablets or laptops for quick testing – smaller devices for rapid detection.”³⁶

The current priority for the team was:

“to replace dying devices and some fast parcel locations will get new trace detection equipment or have access to them. For example, there are plenty at Heathrow.”

- 8.46** In conclusion, inspectors found that trace detection equipment was not being utilised by Border Force staff working in the fast parcel locations observed, due to a mixture of inaccessibility, lack of maintenance, and mistrust of the equipment’s effectiveness. Trace detection equipment is a basic tool of the trade, given the importance of Border Force’s work in protecting the UK from controlled drugs. To be effective, this equipment should be available to Border Force staff in real time and at the place of examination.

Portable chemical detection equipment

- 8.47** During the onsite phase of the inspection, inspectors observed that chemical detection equipment used by Border Force in the fast parcels environment was supplied by a single supplier. Officers had also used other equipment, on loan from other Border Force locations, or as part of a manufacturer trial.
- 8.48** Officers did have faith in the ability of the equipment to identify controlled drugs, within the limits of its operational capabilities. The portable nature of the units also allowed for them to be deployed anywhere, as they were small enough to be carried by a Border Force Officer.
- 8.49** Officers were particularly reassured that this equipment could identify controlled drugs within packaging, without exposing officers to the contents of a consignment – something which was important in the event of detection of hazardous substances such as fentanyl. However, the equipment had limitations in terms of the nature of substances it was able to identify.
- 8.50** During onsite observations at EMA, Border Force staff told inspectors that there should be a unit based at two of the FPO locations and one at the Border Force office. However, two of the three units were out of commission and had to be sent back to the manufacturer for repair.
- 8.51** One of the units had been recently returned by the manufacturer, and officers deployed with this unit during the onsite phase of the inspection. Inspectors observed that no one from Border Force checked the unit before the deployment. When officers came to use the unit at the fast parcel operator location, they found the manufacturer had returned it without a battery and the unit was unusable – with officers then having to resort to testing a questioned substance with several field tests. This could have been avoided if there was an assurance regime in place to confirm all equipment was in working order prior to the deployment or at the start of each shift.
- 8.52** In summary, Border Force staff working in the fast parcels environment had faith in chemical detection equipment, and rated it highly compared with other equipment. However, the robustness of this equipment and the assurance regime to monitor the serviceability was questionable, given two of the three units at EMA were out of commission.

³⁶ In its factual accuracy response, the Home Office provided the following additional information: “However, some innovative trace technologies are not yet mature enough to pass baseline confidence level detection testing and be deployed operationally.”

Drug field tests

- 8.53** Drug field tests were the only detection equipment that inspectors saw utilised during the onsite phase of the inspection. Field tests are a rudimentary and low-tech means of indicating whether a queried substance is likely to be a controlled drug.
- 8.54** When asked to identify any detection equipment that worked well, Border Force officers immediately cited drug field tests. Feedback was positive on the value of this equipment. Inspectors observed tests being successfully used to identify a consignment of suspected cannabis, and to confirm a questioned substance was not a controlled drug.
- 8.55** Inspectors did have concerns that to use the tests effectively, officers would need to have some idea of what the suspected drug was. It was also notable that field tests are not available for certain controlled drugs. For example, during the onsite phase, a consignment of khat was identified, but there was no field test available to confirm this substance.
- 8.56** In summary, these tests worked well for Border Force, but were a low-tech means of identifying controlled drugs, when compared with trace detection or portable chemical detection equipment. The use of field testing on multiple consignments is likely to be time consuming for Border Force staff, and there is a risk that controlled drugs might not be identified if the wrong field test is used.

Fume extraction and isolation equipment

- 8.57** Of the four off-site locations where Border Force staff were deployed during the onsite phase of the inspection, only two of those locations had a fume cupboard provided. Fume extraction facilities are important, as Border Force officers may encounter hazardous or noxious substances in the course of their duties. Fume extraction is necessary to avoid exposing officers and stakeholders to dangerous substances.
- 8.58** During onsite observations, officers pointed to the availability of fume extraction cabinets as a basic tool they considered essential to examine questioned substances. Officers had a good sense of the health and safety aspect of their role, as well as their wider responsibilities for the health and safety of others outside of Border Force. One officer told inspectors: "If I had any doubt about the safety of our staff or staff working in the sheds [FPO locations], I wouldn't hesitate to ask everyone to clear the shed immediately."
- 8.59** Inspectors queried what would happen at the other locations if a noxious or dangerous substance was encountered. Officers pointed to a sealed box, into which potentially hazardous items could be transferred. Officers also told inspectors that respirator equipment was available at some of the locations where they worked, held securely in their ullage cages.
- 8.60** Inspectors noted that officers deploying to remote locations during the onsite phase of the inspection did not routinely deploy with respirators or isolation boxes. Nor did inspectors observe any equipment to secure consignments in the luggage compartment of vehicles to prevent them moving around while in transit. It was unclear how Border Force staff could deal with a potentially noxious substance without asking further officers to deploy to the location with additional equipment. This had the potential to impact the fast parcel operator's operation.

- 8.61** In conclusion, it was a matter of concern that safety equipment to deal with and transport hazardous substances is not deployed as a matter of routine, particularly in a regime where consignments are not fully searched before transporting them to Border Force offices.

Figure 9: Summary of conclusions

Working well	Needs improvement
Border Force staff had faith in chemical detection equipment, where available.	The structure and responsibilities of teams currently tasked with the management of Border Force's detection equipment appear needlessly complex.
Drug field tests worked well and were relied upon by staff.	The overall provision of detection equipment was inconsistent across various locations.
	There did not appear to be a plan to fix or replace broken, ageing, or obsolete equipment.
	Training on detection equipment was not integrated into the Border Force training programme and there was no ongoing programme of refresher training.
	Border Force teams deploying to remote FPO locations did so with an inadequate provision of equipment.
	The volumes of fast parcels entering the UK are vast and basic screening tools, such as x-ray, are not in use.
	Trace detection equipment was not being utilised by Border Force staff.
	A regime to monitor the serviceability readiness of equipment was questionable.
	Safety equipment to enable the transportation of hazardous substances is not deployed.

9. Inspection findings: management information

Strategic performance records

Reliance on external IT systems

- 9.1** There is no single internal Border Force database for customs activity. Instead, Border Force officers are required to input seizure information on two IT systems – Centaur (owned by His Majesty’s Revenue and Customs (HMRC)) and [Redacted] – which is a duplication of effort.³⁷ A senior leader informed inspectors that “work is in train to migrate on to a single platform”; however, it was also acknowledged: “We aren’t good at delivering IT projects in government. We are listening; there are legal processes that we have to go through.”
- 9.2** Inspectors identified that access to HMRC systems and data was an issue for Border Force staff. The fast parcels modal risk register includes the risk that “chronic unreliability of access to HMRC-owned systems” would lead to the loss of access to HMRC’s IT platform and that is a “Serious compromise to Border Security as a result of targeting being unsighted on high-risk profiles/selectors ... public protection issues, loss of revenue, and damage to Border Force (BF) reputation.” While this risk was recorded as trending down (from red to amber as of April 2023), the mitigations currently in place appear focused on the fast resolution of access to systems, rather than a long-term fix.
- 9.3** Furthermore, senior managers advised inspectors at the beginning of this inspection that the only performance data available was derived from a series of locally maintained spreadsheets. Several managers cited poor data as their main challenge; a senior leader stated: “We have got it locally and we won’t argue it is 100% accurate, but it gives me enough to make decisions at my level.” Such information is not assured to the level of official government statistics. Therefore, any data provided during this inspection is indicative only.

Demonstrating transparency and accountability

- 9.4** Inspectors considered why data was not being extracted from HMRC’s IT systems to provide Border Force with assured and comprehensive data on its performance in relation to fast parcel operations. Information that is provided by HMRC to Border Force on a national level combines all freight data and from all transport modes, and therefore is not fast parcels specific. A senior manager said that it “does not allow us to cut data in a way that would be useful for our investigations. Local records are needed to help us on the ground and to inform our resources.” Inspectors queried why Border Force did not have the capacity to extract management information from Centaur. HMRC were unable to limit their data output to the areas solely within Border Force’s remit. Therefore, in order to adhere to the requirements of UK GDPR, HMRC has denied Border Force such access.³⁸

³⁷ His Majesty’s Revenue and Customs databases used to record the seizure of prohibited and restricted items.

³⁸ The Data Protection Act 2018 controls how your personal information is used by organisations, businesses, or the government. The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR).

- 9.5** Conversely, inspectors noted that the Home Office does report its overall figures for customs activity in quarterly transparency releases on GOV.UK. As suggested above, this data provides only the volumes and numbers of seizures by commodity on a national scale and cannot be broken down either by mode of transport into the UK, or by a location more specific than one of the constituent countries of the UK. This limits its usefulness.
- 9.6** Other government departments expressed that Border Force's data was their "main frustration", describing it as "quite random and disjointed at different ports". Industry representatives explained that the lack of publicly available data meant that they could not feed into their own "threat assessment needs" or understand trends. Instead, they are using figures from publicly available EU reports to quantify the UK threat.
- 9.7** Border Force staff are hindered in their ability to monitor or evaluate their performance as a consequence of not owning Centaur, which holds national fast parcels seizure data. Instead, the use of locally maintained spreadsheets provides only an indicative level of performance data, which is inadequate.
- 9.8** The only measurement of performance available in fast parcels is the volume of seizures made by various teams. Managers cited "commodity results" when asked about their success rates. However, this is not a reliable method of assessment of their work, given that the number of prohibited and restricted goods coming through the border is, and perhaps always will be, an unknown. It is impossible to know whether Border Force's anti-smuggling activities are effective, as the number of seizures as a proportion of all prohibited and restricted goods entering the UK in fast parcels is unknown. Additionally, the difficulties faced by Border Force should not be used as an excuse for failing to demonstrate its use of powers allowing interference with private property and slowing the movement of legitimate goods across the border is justified, lawful, and proportionate.
- 9.9** In relation to the reliance on locally maintained spreadsheets, inspectors found inconsistencies between different Border Force offices as to how this data is captured and recorded. Some offices reported on the quantity of a commodity seized, while others reported on the volume. This made any meaningful analysis difficult and undermined the credibility of such data.
- 9.10** In conclusion, Border Force's ability to measure performance is hindered by an inability to access accurate and meaningful data on a national level. Senior leaders are confident that what they do have is adequate to understand and establish the border security risks in fast parcels operations

Local performance records

- 9.11** Where interception of a consignment leads to prohibited or restricted items being detected and seized by Border Force, officers complete a number of records, including an entry in their notebook, a seizure form, entry of key data onto Centaur, and entering details of the seizure into local spreadsheets.
- 9.12** Inspectors identified that Border Force were not recording sufficient data of their activity in this area. At East Midlands Airport (EMA), inspectors established that activity was only recorded for targeted selections, positive self-selections, and when damage was caused to property during an examination. This meant that reasons for selection were not recorded when no prohibited or restricted items were detected.

- 9.13** Inspectors considered that, were Border Force to maintain records of negative interceptions, it would be able to record the total effort it inputs into fast parcel operations. Presently, this is not the case.

Targeted selections records

- 9.14** Following examination of a consignment, officers are required to provide both outcomes and feedback on the target sheets provided to operational teams by the National Fast Parcels Targeting Team (NFPTT), including when the outcome of a search is negative. This data enables NFPTT to identify and test trends, to monitor effectiveness of targeting, and functions as an assurance mechanism of the profiles driving targeting on the Anti-Smuggling Networks (ASNs). Therefore, the provision and quality of this feedback is central to the ability of Border Force in ensuring the efficiency and effectiveness of its targeting processes.
- 9.15** An internal review carried out by Border Force's Operational Assurance Directorate (OAD) in November 2022 found that, since the beginning of the year (April 2022), the NFPTT had not received feedback for 4,292 category C targets (9% of the targets issued in the reference period). The report notes that reasons given for those omissions included that there was a delay between targets being issued and being examined, consignments never arriving in the UK, or user error. Subsequently, this created a large gap in terms of meaningful feedback available to the NFPTT.

Self-selection records

- 9.16** While there is an audit trail for all targeted selections, which includes the reason for and outcome of a search, there is no such structure in place for parcels that are intercepted through self-selection. Self-selected seized parcels are recorded on the same HMRC IT systems as targeted seizures; however, the reason for selection is recorded in an officer's notebook and in the 'notes' section of a local spreadsheet.
- 9.17** Officers explained to inspectors that, where a self-selected parcel is intercepted but not seized, and no damage is caused, there is no requirement to make any record of the interception, including a notebook entry. If damage is caused, officers are required to record the interception on a local spreadsheet; however, details as to why the parcel was intercepted are not included. When questioned about their general reasons for selecting consignments for inspection, officers were unable to provide any tangible reasons beyond their experience.
- 9.18** Inspectors observed officers undertaking searches of consignments. At the conclusion of every search, officers seal or mark boxes with Border Force branded tape, which has the effect of signalling to the consignee that their parcel has been opened and examined by Border Force.
- 9.19** Not only does lack of data recording of all interceptions render Border Force vulnerable to false accusations of malpractice, but it also adds to the risk of insider threat, limits the extent and quality of performance management, and misses an opportunity to feed into the intelligence picture to help targeting teams. Furthermore, with no record of negative searches, it is impossible for Border Force to understand the proportion of self-selected searches that are successful and, when combined with both targeting sheets and records of self-selected interceptions that have led to seizures, would furnish Border Force with a data record of all examinations conducted by their teams.

- 9.20** A Border Force manager said that they would have concerns that any requirement to record the reasons for selection in a negative interception would be administratively burdensome and harm operational efficiency. While acknowledging this, in isolation, it is not a justification for a failure by Border Force to record evidence that its use of enforcement powers is lawful.
- 9.21** In its review of November 2022, the OAD recommended that Border Force postal operations at Coventry International Hub reintroduced mechanisms to maintain satisfactory records of negative interceptions. This was based on recommendations made in the ICIBI's 2016 inspection.³⁹ The OAD review notes that in the ICIBI's 2019 reinspection of postal operations, the recommendation relating to the recording of negative interceptions was considered closed. Additionally, Border Force postal operations based at Langley had continued to maintain records of negative interceptions with the use of local spreadsheets. Inspectors concluded that best practice and lessons learned from previous ICIBI inspections were not being shared between postal and fast parcel modes.
- 9.22** Furthermore, the absence of tracking self-selections with negative outcomes means that team and overall performance cannot be measured. Operational staff and their managers were confident that self-selection was an effective form of detecting prohibited and restricted goods due to the well-tuned experience of their officers. However, without accurate data covering all examinations, including the number of negative selections, and including comparisons by region, an element of confirmation bias could not be discounted and might feed into this confidence.

Figure 10: Summary of conclusions

Needs improvement
Border Force has unreliable access to seizure databases provided by HMRC.
Border Force officers are required to input seizure information onto multiple record-keeping systems.
Managers are not able to extract management information from record-keeping databases and therefore rely on inconsistent locally maintained spreadsheets for performance data.
While Border Force does publish transparency data, it does not break this down into subcategories limiting the meaningfulness of the data, especially for stakeholders.
Border Force does not keep records of all fast parcel interceptions, or the reasons for these interceptions.

39 ICIBI, 'Inspection report of Border Force operations at Coventry and Langley postal hubs, October 2016' (published 13 October 2016), <https://www.gov.uk/government/publications/inspection-report-of-border-force-operations-at-coventry-and-langley-postal-hubs-october-2016>

10. Inspection findings: assurance, risk, and culture

- 10.1** In assessing Border Force's capability in detecting prohibited and restricted goods in fast parcels, inspectors considered the effectiveness of its governance, assurance regime, and risk management against the ICIBI's expectation that "Each immigration, asylum, nationality or customs function has a Home Office 'owner'" who is responsible for, among other aspects:
- performance
 - managing risks⁴⁰
- 10.2** Inspectors found that there was inadequate strategic governance, oversight, and assurance of fast parcels operations.

Assurance

- 10.3** Border Force's Operational Assurance Directorate (OAD) defines the overall assurance regime for Border Force in its 'Border Force assurance expectations' document. This document outlines the "minimum standards ... all Border Force locations should be achieving".
- 10.4** In relation to customs activity, the assurance expectation is summarised as:
- "Examinations of people, goods, vehicles, premises, and documentation for customs purposes are conducted professionally and in accordance with legislation and published guidance/instructions."⁴¹
- There are also relevant assurance expectations separately relating to health and safety, equipment, intelligence, and post-seizure management. Fast parcels are not specifically referred to within the 26-page document. Border Force's postal operations, however, have a bespoke set of assurance expectations.
- 10.5** Border Force's assurance framework requires that local or regional managers determine the rhythm and nature of first-line assurance checks to be undertaken at ports of entry. To assist local managers, the Border Force OAD provides a standard assurance spreadsheet, which was in use in fast parcel operations and guided monthly checks of activity against the assurance expectations. The outcomes of checks were marked against a RAYG rating.⁴²

⁴⁰ The full expectation is set out in Annex B of this report.

⁴¹ Border Force – October.

⁴² Red, amber, yellow, and green (RAYG) ratings are assigned to each indicator.

First-line assurance⁴³

- 10.6** Inspectors found that several of the first-line assurance RAYG ratings for East Midlands Airport (EMA) did not reflect inspectors' findings during the onsite phase of the inspection. This indicated that the first-line assurance regime was not working effectively.⁴⁴
- 10.7** For example, one indicator referred to: "Any customs targets or alerts are met and processed in accordance with guidance." This was assessed as 'green' for each month from December 2022 to May 2023. According to the standard assurance spreadsheet, an assessment of green indicates: "Assurance provides adequate and effective evidence that the indicator is being met." The assessment notes for EMA stated: "The Freight Team examine targeted selections made by the National Fast Parcels Targeting Team using the standard A, B, C targeting classification system. Feedback for seizures and detentions is sent to the Multi-Agency Hub, which in turn informs future target selections."
- 10.8** However, contrary to this assessment, and as outlined elsewhere in this report, during the onsite phase of the inspection inspectors were advised by a Border Force manager that category C targets that they perceived to be poor quality were not progressed, contrary to the expectations of the Border Force Operating Mandate (BFOM).
- 10.9** Furthermore, inspectors found discrepancies between how different Border Force teams undertake assurance and assess risk. Between December 2022 and May 2023, EMA assessed that the fault reporting of detection equipment only required "minor improvements ... to meet the indicator" and marked this assurance check as 'yellow'. EMA had not had a functioning static x-ray machine since August 2022, a situation which inspectors considered could not be described as in need of only minor improvement. In contrast, a Border Force team that reviews the status of x-ray detection equipment nationally assessed the status of x-ray equipment at EMA as a 'red' risk, which OAD classifies as: "No aspect of the indicator are being met [sic], or there are fundamental weaknesses that need addressing."
- 10.10** Border Force Higher Officers (BFHOs) provided an overview of the assurance checks that they undertook each month in line with the Border Force assurance expectations. These checks consisted of reviewing notebook entries and spending time working alongside their operational teams to assess working practices against the assurance framework on a once-weekly basis. Assurance activity was focused on the recording of positive examinations in targeted parcels. Managers reported eight notebooks were selected for assurance per month, alongside the relevant seizure files and entries on His Majesty's Revenue and Customs (HMRC) systems. Border Force officers also reported their notebook entries were checked on a random basis.
- 10.11** EMA recorded the assurance of notebooks as being 'green' from December 2022 to May 2023. Associated comments stated: "Assurance of notebooks is conducted monthly by the HOs [Border Force Higher Officers] for staff on their individual teams."
- 10.12** Examinations that did not result in a seizure were not routinely recorded, and therefore BFHOs were unable to undertake any assurance of the reasons why these parcels had been selected for examination. One Border Force manager commented that staff are left to "run wild and free". Without any assurance of self-selection decisions, Border Force cannot be confident that all self-selection decisions were legally compliant.

43 First-line assurance refers to the oversight of operational business activity, to ensure that actions taken by front-line staff comply with Home Office policies and procedures to help achieve specified objectives and goals.

44 Red, amber, yellow, and green (RAYG) ratings are assigned to each indicator.

- 10.13** While BFHOs attend examinations with Border Force Assistant Officers (BFAOs) and Border Force Officers (BFOs) once a week, the actual examination and searching process was not assured, regardless of whether there was a positive or negative result. The lack of any assurance of the quality and consistency of these searches was a missed opportunity to drive improvement for future searches.⁴⁵
- 10.14** In an OAD review of postal and fast parcel processes and practices in November 2022, it was noted: “As officers at locations dealing with fast parcels only examined items subject of intel alerts [targeted selections] and there were no self-selections there was a record of all items examined regardless of whether there was a positive or negative outcome. This provided an audit train [sic] for any complaints.” However, this does not correspond with the operational practices observed by inspectors, as both officers and managers said that they examined both targeted and self-selected parcels.
- 10.15** One expectation in the Border Force assurance framework states: “Any stops/searches/boarding operations for customs purposes are justified, proportionate, appropriately authorised, carried out in line with guidance and properly recorded.” This is a ‘priority indicator’ that “MUST be subjected to regular and routine assurance/testing”. For EMA, between December 2022 and May 2023, this activity has been marked as “N/A”, indicating that no assurance activity had been undertaken.
- 10.16** The National Fast Parcels Targeting Team (NFPTT) had its own internal assurance framework to assess the quality of targets. Risk profiles loaded onto the Anti-Smuggling Networks (ASNs) were subject to regular review to assure that they remained relevant and were identifying suspected importations of prohibited and restricted goods. Where risk profiles were not leading to seizures, profiles were retired.
- 10.17** Managers in the NFPTT also assured the quality and rationale of the targets produced by NFPTT staff. Between five and six targets were checked each month to ensure that officers were applying the appropriate category (A, B, C, or U). Target data was broken down into various categories by targeting officers to consolidate the information. This enabled managers to assess trends across targeting officers, and also informed monthly performance reviews with officers. BFHOs from the NFPTT also assured approximately eight targets from their teams each month for performance management purposes.
- 10.18** In conclusion, there were inconsistencies in the assurance expectations and assessments of different Border Force teams. This undermined the effectiveness of the first-line assurance regime. Furthermore, the Border Force OAD assurance expectations were not tailored to assurance activities in a fast parcel environment. This caused difficulties for managers applying the framework in fast parcel operations.
- 10.19** Inspectors also concluded that while there is an assurance regime in place, BFHOs were not undertaking assurance checks on negative examinations from self-selected fast parcels. Furthermore, there was no assurance of search methodology to ensure it was consistent and in line with Border Force guidance. Conversely, the NFPTT had good levels of assurance of the profiles used to determine which parcels should be targeted for interception.

⁴⁵ In its factual accuracy response, the Home Office commented: “BFHOs attend more than once a week when they can, but they have multiple roles at this location. For example, they are often directed to deploy to the PCP.”

Second-line assurance

- 10.20** Border Force Operational Assurance Directorate (OAD) provides second-line assurance of Border Force's operational activity by setting standards and undertaking reviews of first-line assurance activity.
- 10.21** In its November 2022 review, referenced in the preceding section, the OAD identified issues regarding health and safety, assurance, and insider threat risk. Inspectors found a fast parcels operational senior leader with significant strategic responsibility for oversight of fast parcels operations was unaware of the review, the recommendations, or any progress made. This lack of awareness at the most senior strategic level in Border Force Central Region pointed to an assurance and governance regime that was insufficient, with a lack of strategic ownership of the issues identified.
- 10.22** One governance indicator referred to: "Clear business and/or workforce plans are in place setting out the unit's objectives, how that contributes to departmental aims, and associated staffing plans." At East Midlands Airport (EMA) between December 2022 and May 2023, there were no records of this indicator being assured. While the Border Force assurance expectations do not specify how often this indicator should be reviewed (a decision which rests with local or regional managers), inspectors were concerned to find that this expectation was not reviewed at all in the reference period, given the clear issues around the lack of performance objectives for the unit.
- 10.23** A similar pattern emerged in other fast parcels locations. The entire section relating to this governance indicator was omitted from the Stansted Airport assurance record, nor was it referred to in the Tilbury assurance record. The indicator was only assessed at Birmingham and Coventry airports, where it was assessed as 'green', despite the lack of performance targets or individual objectives articulated to inspectors during this inspection.
- 10.24** The OAD review also found that no formal assurance had been undertaken of the management and secure storage of suspect consignments referred by fast parcel operators to Border Force for examination. The OAD concluded that there was a risk that goods could be tampered with by third parties prior to Border Force examination or could be removed from fast parcel operator premises without Border Force's knowledge or consent. For example, the OAD reported that at Stansted, a consignment of cannabis selected for examination had been opened prior to examination by Border Force. The OAD were informed anecdotally that some empty boxes were found which suggested "the contents had been forcibly removed". The OAD review concluded that "some aspects of fast parcels operations present potential for insider threat risks". The recommendation was made that "BF should conduct regular assurance of the fast parcel ... processes to ensure selections are adequate/in line with guidance and goods are not tampered with before being presented to BF."

Risk

Identified corporate risks

- 10.25** Border Force provided inspectors with its risk registers related to its fast parcel operations. This included 16 identified risks: one on the national risk register, one on the Central Region risk register, and 14 on the Border Force Intelligence Directorate (BFID) modal risk register.

- 10.26** The single fast parcels risk on the national risk register concerned increased volume pressures, deployment demands, and technology limitations which could have an impact on Border Force's ability to conduct "business effectively" with a resulting "degradation of Border Security". To mitigate this, a plan referred, in part, to stakeholder engagement strategies.
- 10.27** The single risk on the Central Region risk register referred to ageing ASNs used to process fast parcels and the timeliness of the data provided by fast parcel operators. The risk detailed that "high-risk high-harm commodities are potentially getting through the border because of this failure in systems and process".
- 10.28** To mitigate this risk, reference was made to Project Cerberus, a Border Force software project to deliver a single platform for fast parcel operators to provide parcel data, to facilitate Border Force intelligence checks and targeting. Across all grades, and teams, Cerberus was seen as the solution "everyone is waiting for". However, there was scepticism from some Border Force staff about the reliance on Cerberus solving all these issues and that more timely solutions were required.
- 10.29** Inspectors understood Cerberus will not launch for at least two years. Policy officials told inspectors that the functions of Cerberus had reduced since the initial discussions, and not all data was expected to be incorporated.
- 10.30** As discussed in chapter 7, Border Force's overall effectiveness is hampered by its ability to target fast parcels due to a lack of data. Additionally, where data is provided, ageing and laborious ASNs mean that teams are working under constant time and volume pressure to produce targets based on known risks. It was apparent that there was limited time to enrich category C targets to refine and improve them, which could be mitigated by a system such as Cerberus.
- 10.31** A further mitigation referred to the reintroduction of a civil penalty scheme in place for unauthorised removals. Border Force could refer fast parcel operators to HMRC for consideration of a penalty of up to £1,000 for the unauthorised release of fast parcels by fast parcel operators, where Border Force required the parcel to be presented for examination. However, a representative from HMRC told inspectors that Border Force has not referred any cases for civil penalty action this year. As a tool to prevent the risk of prohibited and restricted items being released without a customs examination, it is important that Border Force can recommend civil penalty action to HMRC. This is made more important given that the OAD identified the possible unauthorised removal of items by third parties in their review of November 2022.⁴⁶
- 10.32** When inspectors sought clarification on this point, Border Force responded that it has "referred FPOs to HMRC for civil penalty action in 2023. Unauthorised removals occur frequently and therefore Border Force make regular referrals to HMRC for civil penalty action against FPOs." It was not clear to inspectors why these divergent views existed between Border Force and HMRC.
- 10.33** The 14 risks on the BFID modal risk register referred to resources and training needs in relation to the UK's withdrawal from the EU, IT systems, the timeliness of processing intellectual property rights items, and data.

⁴⁶ In its factual accuracy return, the Home Office stated: "East Midlands Airport and the Thames command have issued a number of civil penalties to FPOs."

- 10.34** Inspectors identified additional risks, which were not recorded on the risk registers provided to inspectors and were not managed as effectively as they could have been. Risks observed include the health and safety issues relating to the transportation of unknown articles, risk around the inappropriate use of seizure powers, and fume extraction equipment risks. Four further risks observed by inspectors are detailed in Figure 11.

Figure 11: Risks identified during the inspection process

Risk	Concern	ICIBI comment
Examination of goods by other agencies	Two targeted parcels were wrapped in branded tape from another inspectorate. This indicated the parcels had been opened prior to Border Force examination.	Border Force officers shared the concerns of inspectors that there was a risk to maintaining the chain of evidence. Border Force should be the first agency to examine any goods, due to the possibility of any goods being evidential in a subsequent prosecution.
Insider threat	A large quantity of herbal cannabis was discovered in an examination of a parcel in the Border Force examination area within an FPO location. Three FPO employees entered the room uninvited and observed the examination.	Inspectors were concerned that the areas used for Border Force examination were not secured from FPO employees. There is an insider threat risk, as this exposed Border Force's search methodologies and the fact prohibited goods had been detected.
Notification of damage letters	Damage can occur deliberately or inadvertently when searching parcels for prohibited or restricted goods. The recipient is informed via letter of the damage, an estimate of the item's monetary value, and a postal address to submit compensation claims. There was no email address or phone number for the recipient to raise queries. When goods are damaged prior to Border Force examination, recipients are also notified via a letter.	The absence of record keeping poses a risk to Border Force's position in any subsequent disputes, whether there is an overcompensation or undercompensation claim, affecting public funds. Without photographs, Border Force's ability to produce proof of any damage is dependent on any notes recorded in the officers' notebook. This process is also not assured.

Risk	Concern	ICIBI comment
Post-seizure processes in view of the general public	Seized goods are transported by a private contractor to the King's warehouse for storage and disposal. EMA Border Force officers push wheeled cages containing seized goods through the EMA passenger arrivals hall for the contractor to take custody of the items. One example provided concerned a seizure of 800 bags of cannabis. The arrivals hall was described as "packed", as staff waited outside for the contractor company to arrive.	This posed a security risk, without any mitigation measures in place. Inspectors were concerned this still occurs, seven months after an OAD review, which commented "there was a risk" that regular times could "facilitate interference (insider threat) with the collection".

Culture

Border Force identity

- 10.35** Border Force was formed on 1 March 2012 when front-line border, immigration, and customs functions were separated from the UK Border Agency. In 2008, the border-facing customs function of His Majesty's Revenue and Customs was merged with the Home Office's immigration functions, with a uniform set of priorities and responsibilities, under the umbrella of protecting the border.
- 10.36** Even though Border Force is responsible for maintaining a secure border from an immigration and customs perspective, and has done so for several years, inspectors found clear divisions between the two functional areas of responsibility, which contributed to a lack of corporate identity.
- 10.37** Operational fast parcels team officers were routinely deployed to help immigration colleagues on the passport control. A Border Force manager reported that assisting immigration colleagues had caused an "identity issue" for fast parcels operational officers. There was a perception among operational fast parcels managers that immigration work was deemed "more important" than customs work at a corporate level. One Border Force senior leader told inspectors: "If you miss finding a gun, no one knows. But it will be in the news if there are long queues." One Border Force manager reported the focus on passport control was detrimental to customs work, and therefore posed a risk to national security.
- 10.38** Some managers when assisting the passport control continued to be available to their fast parcel teams for telephone queries, and so felt they were doing "two jobs" simultaneously. However, a senior Border Force leader told inspectors that the expectation was for managers to take a "corporate-level view of this and that all staff are there to protect the border."
- 10.39** Inspectors found the perception of passport control work differed according to grade and level of experience. Front-line officers who had joined since the formation of Border Force were seemingly happier with the variety of work available to them. Furthermore, managers and officers from some Border Force offices were more positive about immigration work, with mobile team officers commenting that they enjoyed working on the passport control.

10.40 In ‘An independent review of Border Force’, published in 2022, Alexander Downer concluded:

“Border Force’s identity is split between being a law enforcement organisation versus a customer service, administrative organisation. It is also still informed by its precursor organisations with Border Force officers frequently still referring to themselves as an immigration or customs officer.”⁴⁷

This view was consistent with what inspectors observed during this inspection.

10.41 Such views were not limited to more operational colleagues. A senior Border Force leader “understood” why some staff had a negative perception of immigration work. The senior leader stated: “In some ways, because [staff] are moaning about other areas, it is because they have passion and enthusiasm. I would be worried if they were not.” Inspectors considered that the need for a corporately held and consistent identity, centred on protecting the public with a secure border, needed to permeate through all levels of the organisation.

Openness to change and development

10.42 Inspectors found a clear dichotomy between newer staff and more experienced staff. Newer staff identified there is a need for new and improved ways of working. However, when they raised suggestions, they felt disregarded. One officer reported: “There are old school values that need phasing out.”

10.43 Senior Border Force leaders acknowledged that although “when new people join the organisation, they get dragged down” and “in some way, it is them and us”, there was reason to be more “optimistic”. The importance of ideas from new staff was welcomed by one Border Force senior leader.

Team culture

10.44 Most teams spoke of strong working relationships with their line managers and colleagues. Operational fast parcels officers from EMA, Coventry, and Birmingham all commented on having close-knit teams that helped to create a good and open working culture. This was echoed by managers.

10.45 However, it was clear to inspectors that elements of dissatisfaction between different operational teams existed. The behaviour exhibited by operational Border Force staff at EMA was not promoting a collegiate or positive relationship with the National Fast Parcels Targeting Team (NFPTT). Inspectors reviewed a spreadsheet which was used by both teams, both to allocate targets and for operational customs staff to provide feedback to the NFPTT. This was often limited, such as “nothing of customs interest” or the even shorter “NOCI”. Inspectors also identified more inappropriate and injudicious comments.

10.46 Additionally, managers on the operational team were particularly scathing about the work of the NFPTT, with one telling inspectors: “It’s got worse. It’s dreadful. It’s utterly awful. I am on a crusade to improve it.”

10.47 During interviews and focus groups, one manager told inspectors that he “triaged” the target list provided by the NFPTT and released parcels where, in his opinion, the target was not good.

⁴⁷ Alexander Downer, ‘An independent review of Border Force 2022’ (published 20 July 2022), <https://www.gov.uk/government/publications/independent-review-of-border-force/an-independent-review-of-border-force-accessible-version>

This manager openly acknowledged his conduct was damaging the working relationship, stating it was “why the relationship is so poor at the moment”.

- 10.48** From the targeting side, there was also an acknowledgement of a difficult working relationship with their operational colleagues. One member of targeting staff told inspectors: “There is a wall between intel and the front line, we are trying to break through but there is resistance from the other side.”
- 10.49** In conclusion, it was apparent to inspectors that the lack of a clear corporate identity for Border Force that was felt by staff had the potential to limit their operational effectiveness. This was especially apparent where managers and longer-serving colleagues held and expressed negative views in an unconstructive manner, and where such views were causing tension and division between teams who should be focused on the same strategic objectives. The provision of a secure border is important irrespective of the function an individual is executing at that time.

Figure 12: Summary of conclusions

Needs improvement
Border Force is not managing its performance as successfully as it could.
First- and second-line assurance regimes are failing to address routine performance issues.
Operational risks are not being identified and managed effectively.
Culturally, fast parcels teams are impacted by entrenched behaviours and a lack of a clear corporate identity for Border Force.

11. Inspection findings: engagement

Local-industry engagement

- 11.1** Border Force requires fast parcel operators (FPOs) to provide access to their facilities, deliver consignments for examination, provide data for targeting, and, at times, use their equipment, such as x-rays. Only at East Midlands Airport (EMA) are there regular meetings held between Border Force and industry representatives. At all other ports meetings take place when they are deemed to be required and are not subject to a regular timetable.
- 11.2** Formal memoranda of understanding exist between Border Force and each of the FPOs. Border Force declined to share these with inspectors on the grounds of commercial sensitivity, and because it did not have the permission of stakeholders to share them.
- 11.3** Building relationships with stakeholders both inside and outside government forms part of the job description for operational Border Force staff at all grades working in fast parcels operations. Even though there was a mixed picture of how local engagement was viewed by industry, representatives spoke more positively about the relationships they have with their local Border Force operational teams in comparison with the relationship they have at a national level.
- 11.4** Industry representatives described their relationship with Border Force as ranging from “reasonable” to “excellent” and spoke positively about Border Force’s quick response when they make referrals to them. Although Border Force have the legal authority to enter FPO premises, inspectors observed Border Force officers being openly welcomed by FPO staff into their premises. An FPO representative told inspectors that Border Force officers can enter their facility “whenever they want”. This was also reflected by local Border Force staff in both front-line and targeting teams, who mainly spoke positively about relationships they had developed with local FPOs.
- 11.5** Industry stakeholders told inspectors that there was an inconsistency in approach between different local Border Force teams, both in terms of the frequency of attendance at their sites, and in how they carry out their work. Inspectors concluded that, on a local level, engagement was enabling Border Force to be efficient and effective in the detection of prohibited and restricted items.

National engagement with industry

- 11.6** FPOs are also integral to Border Force’s future transformation plans, with Border Force expressing a desire for industry to act as the ‘first layer of detection’ by their use of technology for the screening of parcels. Inspectors found that on a national and strategic level, engagement with FPOs was inconsistent and lacked co-ordination. There was no formal routine national or strategic engagement between the industry and Border Force. Border Force managers stated that they do not sit on any national working groups with fast parcel industry

representatives. Border Force's Transformation Team told inspectors that engagement with industry was at an early stage and, despite an aspiration to engage, doing so was complicated by the fact that His Majesty's Revenue and Customs (HMRC) "owns the relationship".

- 11.7** Trade associations representing FPOs told inspectors that Border Force's national strategic engagement compares poorly with other government departments, including HMRC, and that there is no routine engagement with the industry, with it being described by one stakeholder as "sorely lacking".
- 11.8** Industry representatives stated that, when Border Force attends meetings and forums, they do not play an active role, with an industry representative saying: "Border Force feel they contribute but they do not speak at forums. It is not active engagement." Moreover, industry representatives reflected that, when meetings are held with senior officials, it does not translate into action at an operational level.
- 11.9** HMRC have primary responsibility for most of the legislation and policy that determines how Border Force operates when dealing with fast parcels. Industry stakeholders told inspectors that they encounter an inconsistency of approach when engaging with Border Force and HMRC, especially on matters of policy. An industry representative told inspectors that HMRC and Border Force "take different positions" and "it does not feel like a joined-up approach".
- 11.10** A Border Force senior manager told inspectors that while Border Force representatives sit on a working group alongside the industry trade body, they did not feel the meeting brought much value.
- 11.11** Industry representatives told inspectors about specific issues at Stansted Airport, stating that there were delays in Border Force examining consignments that Border Force had asked to be held for examination. This was confirmed by a Border Force senior manager, who stated that Border Force operations at Stansted were six weeks behind on their examinations at the time of this inspection. In November 2022, Border Force's Operational Assurance Directorate carried out a review of fast parcels operations. The backlog in examinations at Stansted was the subject of a recommendation in this review. It stated:

"Resourcing at Stansted should be reviewed to ensure that seized goods are dealt with appropriately and in a timely manner and to reduce/eliminate the backlog."

Customers pay FPOs for an express, expedited, end-to-end delivery service, so delays in Border Force examinations, such as those at Stansted, are problematic for FPOs' operating model. Additionally, one of Border Force's strategic priorities is to "facilitate the legitimate movement of individuals and trade to and from the UK". This strategic priority is incompatible with a backlog of fast parcels waiting several weeks for examination.⁴⁸

- 11.12** Industry representatives summarised Border Force's national and strategic level of engagement as inconsistent and ineffective. They perceive that it only takes place when Border Force "want something from them". If transformation plans, which are yet to be confirmed, require the input or funding of industry, it will require goodwill, in order to align policies. It was not clear that effective relationships are in place to establish long-term partnerships that would help Border Force achieve the dichotomous aims of both securing the border and allowing the legitimate movement of goods.

48 Border Force, 'About us', <https://www.gov.uk/government/organisations/border-force/about>

Engagement with His Majesty's Revenue and Customs

- 11.13** Border Force's relationship with His Majesty's Revenue and Customs (HMRC) is arguably the most important one it has with another government department, given that HMRC has responsibility for setting customs requirements that industry must adhere to when importing and exporting goods to and from the UK. HMRC also retains responsibility for the Customs and Excise Management Act 1979, the key legislation and policy that governs Border Force's work in fast parcels.
- 11.14** The Borders, Citizenship and Immigration (BCI) Act 2009 provides the legislative framework for Border Force staff, designated as customs officials, to exercise customs powers. The BCI Act vests general (non-revenue) customs functions in the Home Secretary and customs revenue functions in a statutory office holder, the Director of Border Revenue, which is the Director General of Border Force. Those general customs functions and customs revenue functions are delegated to Border Force staff designated as customs officials. A partnership agreement exists between the Home Office and HMRC which sets out the collaborative working arrangements between HMRC and the Home Office in respect of Border Force. The Director of Border Revenue receives an 'Annual Remit Letter' from the financial secretary to His Majesty's Treasury setting out the remit for the customs revenue work of Border Force for the financial year.
- 11.15** Inspectors received limited evidence of formal routine engagement between Border Force and HMRC on a national, strategic level in relation to fast parcels. A senior Border Force manager, whose responsibilities include liaison with HMRC, told inspectors that while there is a partnership committee that both HMRC and Border Force sit on, there is little strategic engagement with HMRC with a focus on fast parcels as it is not seen as a priority. A senior manager from another government department told inspectors: "I think the answer is it needs more senior buy-in and attention. And I think both our departments have struggled with that in terms of ministerial priorities being elsewhere."
- 11.16** Inspectors requested details of staff who could detail what strategic engagement, in relation to its customs priorities, takes place between Border Force and HMRC. Details of these individuals were provided on a piecemeal basis by Border Force, with key individuals only being identified to inspectors at a late stage in the inspection.
- 11.17** None of the contacts provided were able to talk about strategic engagement but instead outlined day-to-day operational engagement at a local level. This apparent difficulty to provide inspectors with the best-placed person to outline strategic engagement indicated a lack of awareness within Border Force of how the organisation engages with HMRC at a strategic level. A senior HMRC manager told inspectors: "We don't have as much engagement with Border Force as we do in other policy areas."
- 11.18** That notwithstanding, where and when there is engagement, operational relationships between Border Force and HMRC were consistently described positively. One senior Border Force manager stated:
- "Our relationship is really good. They [HMRC] recognise our role in protecting the border."
- 11.19** This view was shared by another Border Force senior manager working on transformation, who told inspectors that they work "hand in glove" with HMRC. A senior strategic manager told inspectors that, historically, issues in the relationship between Border Force and HMRC were

escalated to them, but that this was no longer happening, which they saw as evidence of the relationship working well.

- 11.20** The positive working relationship was also reflected by HMRC managers. They told inspectors that operational engagement was effective and took place on a daily basis. Another HMRC manager stated that they have found Border Force staff to be “really supportive and collaborative”.
- 11.21** Operational Border Force managers expressed their frustration to inspectors around HMRC policy decisions, which did not prioritise the requirements of Border Force when developing policy and procedures. Operational managers with responsibility for transformation were particularly concerned about the ‘data gap’, where fast parcel operators were not obliged to provide pre-arrival data for fast parcels to facilitate targeting. They felt that Border Force was limited in what it could do to address this risk because “it’s a complex picture. HMRC own the relationships with industry around Fast Parcels and data.”
- 11.22** HMRC managers also reflected that there was a perception that fast parcel activity was not a priority for Border Force, because of the focus on immigration activity. One manager told inspectors:

“If you let stuff in, no one cares, but if there’s a queue at the border ... it’s all over the front pages ... it’s understandable why ministers don’t focus on this. I just always found in other countries it’s seen as like a moral outrage ... how can you accept a system where you don’t know what’s coming in?”

- 11.23** While engagement with HMRC at a local, operational level was positive, inspectors found a less clear picture of national-level strategic engagement between the two organisations in the area of fast parcels. Fast parcels was not considered to be a priority and therefore the interaction between the two is focused on the operations at a local level, with a clear divergence between governmental priorities and operational difficulties. A representative from another government department stated:

“We came under a lot of pressure from fast parcel operators to introduce something that didn’t inhibit trade ... I don’t know if it was the steer from the Home Secretary, but it was certainly the steer from the Treasury ministers that we work to, that we should prioritise flow at the border.”

Relationship with other government departments

- 11.24** As well as HMRC, Border Force engages with several other government departments (OGDs) that have responsibility for dealing with prohibited and restricted items, such as the police, Trading Standards, and the Department for Environment, Food and Rural Affairs (DEFRA). This can involve the sharing of intelligence, detaining suspect parcels, or referring suspect parcels to the relevant OGD where further action is required from them, such as where medicines might require further analysis. The OGDs that inspectors spoke to all reflected that they had a positive working relationship on an operational, day-to-day basis with Border Force. One representative told inspectors:

“I can’t recommend them [Border Force] enough. The assistance they have offered is incredible.”

- 11.25** However, some of Border Force’s law enforcement partners told inspectors that, while they had input into Border Force at a strategic level, they felt there was a missed opportunity to have input at an operational level as they were not routinely invited to local Tactical Tasking and Co-ordination Group (TTCG) meetings.⁴⁹
- 11.26** Relationships between OGDs and Border Force were especially strong where the OGD had directly funded Border Force officers to focus on detecting prohibited and restricted items for which that OGD had responsibility for tackling. OGDs told inspectors that they assessed Border Force as “very effective” and that, overall, they were “very pleased” with Border Force’s performance.
- 11.27** OGDs that have not funded Border Force officers told inspectors that, while relationships were positive with local Border Force teams, it was challenging to engage if the OGD’s area of responsibility was not a high priority on the Border Force Control Strategy (BFCs).
- 11.28** One law enforcement partner told inspectors that their area of focus had been “deprioritised” by Border Force in its recent review of the BFCs. The stakeholder felt that the decision was pretty much “a done deal” when Border Force informed them of the proposed changes at a scheduled meeting.
- 11.29** There is no evidence of routine engagement on a national and strategic level with OGDs. Border Force told inspectors that memorandums of understanding are in place with several OGDs but declined to share these with inspectors because it did not have permission to do so. It is not clear if Border Force sought permission to share them with the inspection team.
- 11.30** OGDs spoke positively about their relationship and engagement at an operational level with local Border Force teams. This was especially the case where they had funded Border Force officers to focus on detecting prohibited and restricted items for which they had responsibility. It was clear to inspectors that there is no national-level strategic engagement between Border Force and OGDs in the area of fast parcels. The lack of such a forum hinders the flow of information, and the alignment of priorities is much more difficult, both of which makes Border Force’s job of detecting prohibited and restricted items more difficult.

Figure 13: Summary of conclusions

Working well	Needs improvement
Various stakeholders reported having excellent working relationships with Border Force on a local, operational level.	At a national and strategic level, there was a confusing picture of Border Force’s national and strategic engagement, which inspectors considered to be inconsistent and ineffective.
	Reputationally, Border Force appears to prioritise its immigration functions over customs, which was perceived to be detrimental to industry.

⁴⁹ TTCGs are used to discuss and approve operational priorities and intensifications addressing the risk from specific border threats and involve Border Force and a range of other border stakeholders.

Working well	Needs improvement
	Other government departments with a responsibility to either prevent or control the movement of prohibited or restricted items are seeking more engagement, both operationally and tactically.

Annex A: 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 and 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 paragraph 17 of Schedule 3 to the Equality Act 2010 (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 B: ICIBI ‘expectations’

Background and explanatory documents are easy to understand and use (e.g., 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 ‘owner’

The Home Office ‘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)

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