



**THE UK BORDER AGENCY RESPONSE TO
THE CHIEF INSPECTOR'S REPORT
ON OPERATIONS IN WALES AND THE SOUTH WEST OF
ENGLAND**

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The UK Border Agency thanks the Independent Chief Inspector for this report, and for his comments again about the enthusiasm and commitment of our staff, who deal with the challenges of their roles with professionalism.

The Wales and South West of England was the first geographical area to be chosen for this type of inspection, and we valued the opportunity this snapshot in time presented to us as a lever for improvement. Since the inspection we have been implementing many of the recommendations but there is of course much more to be done and we welcome the opportunity of presenting our proposals here.

We are pleased the inspection recognises that we have done a lot since regionalisation and the bringing together of immigration and customs functions at the border. The Agency welcomes the recommendations to further improve the efficiency and effectiveness of the operations in Wales and the South West of England.

The recommendations are that the Agency:

1. Ensures targets and priorities are made clear to all staff, and introduces working practices to minimise possible conflicts and maximise cross-functional working.

1.1 The UK Border Agency accepts this recommendation.

1.2 The Chief Inspector has acknowledged that in Immigration Group regional targets are clearly set out in the regional Business Plan which has been issued to all staff. This breaks down the target into case type, and the Chief Inspector further acknowledges that members of staff were generally aware of both the region's priorities and targets, and its performance against them. The region holds 'all-staff' events twice yearly, in each of the main regional offices. These events were used to discuss business and delivery planning. We will however continue to find other ways to engage, as many members of staff have not recognised these events as business planning and some have not appreciated they had received a copy of the business plan.

1.3 We have historically promoted cross-functional working and this continues, and we agree that we will do more to fully implement this. Functional heads have recently implemented joint tasking meetings, where resources can be allocated and shared in line with the region's priorities. However, it is accepted that targets can sometimes encourage an insular approach that may impact elsewhere. To address this point we are introducing cross functional objectives and targets for the functional leads.

2. Develops regional stakeholder engagement plans, to ensure effective engagement with stakeholders at both strategic and operational levels.

2.1 The UK Border Agency accepts this recommendation in part.

2.2 In Immigration Group, the Chief Inspector recognises the positive impact that regionalisation has had on corporate partners, and acknowledges that, overall, consultation with these partners is considered to have improved.

2.3 The region is well connected at a strategic level and often at an operational level but can be lacking at the middle tiers. The newly embedded Local Immigration Team structures should enable the region to address these gaps. To improve further, the regional lead for corporate partnerships is reviewing the strategy to produce a plan that will include all levels of engagement.

2.4 The Chief Inspector has acknowledged some of the geographical challenges presented by the region, and in order to ensure full, appropriate representation at a strategic level, the Immigration Group senior managers now represents Border Force with key partners such as the Welsh Assembly, where there may be some overlap such as at the Welsh Assembly CONTEST board, that the Immigration Group Regional Director is a member of. We will continue to ensure a joined up approach to corporate partner engagement.

2.5 UK Border Force Wales has good and effective engagement with all the key corporate partners at the border and meetings with them take place on a regular basis. A corporate partners engagement plan will however be developed.

3. Evaluates the efficiency and effectiveness of facial recognition gates, adopts a consistent approach, and maximises benefits from using the gates.

3.1 The UK Border Agency accepts this recommendation.

3.2 Facial recognition gates have been installed in 10 locations, including Cardiff and Bristol Airports, as part of a national trial to determine whether they can help process passengers at the border in a swift and secure manner. The gates are considered to be a success by the airport, staff and the travelling public, and the percentage take-up at Cardiff airport has been the highest of all the trial sites in the country. A full evaluation of the trial is being undertaken.

3.3 As part of the 2010/11 business plan, new targets have been introduced at Bristol and Cardiff to increase gate usage as a percentage of eligible passengers.

4. Provides staff with adequate tools and technology to enable them to be as efficient and effective as possible in securing the border.

4.1 The UK Border Agency accepts with this recommendation.

4.2 Border security is an absolute priority. We continue to work with counterparts overseas to use the latest technology at our ports and check people against a range of watchlists to prevent those who pose us harm from coming to the UK.

4.3 The UK Border Agency is committed to providing staff with the tools and technology to enable them to be as efficient and effective as possible in securing the border. Significant investments have been made in recent years in upgrading IT systems for the front-line as well as introducing the latest biometric and detection technology.

4.4 IT systems in use in both Immigration Group and Border Force are national systems in use by the entire Agency. There have been occasions where a period of access to an IT system has been lost, but these are not frequent and do not normally affect all of our staff.

4.5 The Chief Inspector comments that the new ICW system is being developed and staff have been consulted in this system's design. Instances to loss of access to IT systems is something ATOS, the company contracted to provide IT services to us, is working to minimise.

4.6 The issue around the location of the fingerprint scanner was one of business priority and need. With only one scanner it needed to be re-located where need was greatest and the costs benefits realised, all of which were given full consideration before its move to Cardiff. The suggestion there have been additional costs associated with its move is not correct, including a misunderstanding of police custody charges incurred as a result. Staff have been kept informed of progress since the matter was brought to our attention. The use of the scanner at Bristol was mainly to deal with the processing requirements of potential illegal immigrants picked up from lorry drops. However, recent trends for lorry drops would now seem to suggest there is no longer a need for a second scanner in Bristol.

4.7 All staff at Holyhead now have access to POISE and a business case has been accepted to have networked computers in the terminal at Holyhead.

5. Reviews resourcing requirements to match the needs of the business.

5.1 The Agency accepts this recommendation in part.

5.2 The Chief Inspector has acknowledged that staff and managers in Immigration Group felt the region was working effectively, and recognised the efficiencies that had been realised by moving functions between locations.

5.3 The loss of temporary staff was mandated by the Agency with the aim of cost reduction, before the recruitment exercise to fill these posts was complete. We re-prioritised our work to find ways of minimising the impact of the loss of the temporary staff whilst permanent replacements were being sought. There has been some effect on business delivery but the Chief Inspector has acknowledged the effectiveness of staff in supporting the region to deliver its targets.

5.4 The UK Border Agency does not accept that the region was carrying a large number of vacancies, or that it had been carrying any for a 'significant' time period. More importantly the perception there were 80 vacancies in 2007 is not correct. Understandably, there were start up issues for the region that caused some delay in agreeing the staff complement. As soon as this was confirmed in budget and headcount terms recruitment was initiated. This applied to approximately 40 posts. Later other new posts were confirmed and filled.

5.5 In November 2009, the region had 339 staff in post with only 16 vacancies. Whilst some may have a perception of ongoing vacancies, this clearly isn't borne out by the facts.

5.6 Managers will review responsibilities of teams and individuals to ensure that, where possible, these are relevant to the grade. Where delays in replacing staff occur due to the recruitment and selection process, it remains reasonable that staff may work out of their grade on a short-term basis.

6. Carries out a comprehensive assessment of risk at Holyhead seaport, and ensures adequate resources are deployed to fully meet that risk.

6.1 The UK Border Agency accepts this recommendation.

6.2 Resources within Border Force are allocated on the basis of passenger and freight volumes and on the basis of risk. As border security has tightened in recent years we have seen an increase in attempts to abuse the Common Travel Area provisions.

6.3 We have conducted a risk assessment of the port and decided to increase resources there. Permanent staff will be in post in the next few months and in the interim period we have strengthened resource in the port in the following way.

a) Mobile resources from within the Region to cover more of the highest risk traffic.

b) Working with Immigration Group Wales, an agreement has been reached for them to supply staff on Detached Duty to UK Border Force and to enhance the skills of staff based there. Currently one member is working there permanently supplemented by other colleagues and the arrangement is working well.

6.4 These additional resources will strengthen further border security at Holyhead.

7. Reviews file management and introduces quality checking processes to ensure consistency of decision-making and ceases the practice of officers temporarily 'acting up' to authorise decisions.

7.1 The UK Border Agency accepts this recommendation.

7.2 The Agency recognises that performance could be improved even further for the Immigration Group by implementing formal quality checking processes, and the region is currently examining how this might be undertaken in practice by consulting and working with the Immigration Group's lead for enforcement.

7.3 Within Border Force, the practice of one immigration officer temporarily acting up to authorise refusals has stopped and been replaced by a robust on call roster at SO/Inspector level (who can authorise such refusals). A quality control measure has been put into the assurance programme and will become part of the monthly management checks.

7.4 In Border Force South, a new national assurance mechanism ensures formal checking of decisions while new checklists have been introduced in the SW (referred to in the report) to aid the process.

8. Ensures that all frontline staff are provided with and wear the new UK Border Agency uniform.

8.1 The UK Border Agency accepts this recommendation and has implemented it.

8.2 All UK Border Force staff in Wales and the South West have now been provided with, and are wearing the new uniform. At the time of the inspection a procurement process was in place to ensure that all staff would be supplied with the full uniform but there were difficulties with this process which were outside of the Agency's control.

9. Confirms that all staff have received the mandatory 'Keeping Children Safe' training.

9.1 The Agency accepts this recommendation and has implemented it.

9.2 All staff in Wales and the South West have now completed the 'Keeping Children Safe' training.

10. Acts to ensure staff at Plymouth and Holyhead seaports are provided with adequate, safe accommodation, which complies with health and safety regulations.

10.1 The Agency accepts this recommendation.

10.2 The Chief Inspector has acknowledged that the UK Border Agency has been trying for some time to find alternative accommodation in the Plymouth area which best suits the needs of the business.

10.3 The project to procure new accommodation has been ongoing for a considerable time due to reasons outside the Agency's control, for example, a landlord withdrew a chosen property late in the project delivery stage. The project is deemed to be the highest change management priority for the region. A new Plymouth single site location for all UK Border Agency activity has been identified, funding secured for relocation and refurbishment, a project manager appointed and local staff fully engaged and represented on a local project board.

10.4 The agency took responsibility for Holyhead port in August last year and since then has been working with partners to transfer responsibility for it. Work is underway to secure funding to make the necessary improvements. The Frontier Estates Consolidation Project team has visited the site and are treating it as a priority for funding in this financial year to resolve the accommodation issues there.

11. Reviews its ports detention procedures to ensure that staff do not escort detained passengers unless accompanied by trained guards.

11.1 The UK Border Agency accepts this recommendation.

11 Border Force has secured funding for a security guard to escort detained passengers. A large number of staff now have arrest and restraint training and this option can be used as a possible further solution.

12. Improves its risk management processes in order to provide assurance that risk is being managed effectively.

12.1 Not accepted by UK Border Agency due to factual accuracy issues.

12.2 Risk Management and the Risk Register is a standing item on Immigration Group's monthly Regional Management Board, and the region has achieved Level 3 of the standard Risk Management accreditation required by the Home Office. This was the level the Home Office expected. Attainment of level four is actively being sought in line with the continuous improvement programme that has been introduced by the Home Office and progress is in keeping with the timescale that has been set. The Immigration Group has set targets for the end of the year and we are confident we will meet these. In addition, we have Risk leads in each of our business functions that contribute to the regional Risk position and the Chief Inspector has found evidence of encouragement given to staff to report identified risk. These risk management processes help assure that risks are being managed effectively.

13. Reviews its management of change and how it is communicated to staff.

13.1 The Agency accepts this recommendation.

13.2 The Chief Inspector acknowledges the considerable organisational and regional change which came with the inception of the Agency and its regionalisation. We agree that the communication of change has not always been delivered in a way that engages all staff and this clearly needs improvement.

13.3 We are pleased that the Chief Inspector has identified the positive change initiatives of the opening of the Cardiff Public Enquiry Office and the Swansea relocation, and accept that the Plymouth relocation has not moved as swiftly as we would have liked. However, all staff concerned have received regular progress reports.

13.4 The Local Immigration Team (LIT) programme is part of a three year strategy. Phase one was to identify need on a regional basis and launch the first part of the LIT programme in each region. We held all staff and stakeholder events to explain our high level plans for the region. Our region had existing enforcement operations delivered from 6 locations across the region and we had no need therefore to seek new accommodation to deliver the LIT agenda. Recent staffing changes have enabled us to move to the next phase of our LIT roll out plan. This is being delivered in consultation with all senior managers in the region, from SEO and above, with a view to team level consultation and engagement coming next. We will have delivered all aspects of our LIT programme well within the agreed timeframe.

13.3 We now have a Communications Officer who is engaged in cascading information, especially when something new becomes an Agency priority. We believe this huge change agenda is managed well given the constraints the Chief Inspector has mentioned, but will continue to strive for improvement. Work is being undertaken simultaneously to improve visibility of managers in the region, which we hopeful will help with this issue.

13.4 Changes to terms and conditions are a major ongoing issue which is being dealt with nationally. We have explained to all staff in Wales the issues that affect them, the way ahead, and how they will be consulted at every stage. The latest event, a conference in February 2010 attended by a high level panel covering all aspects of UK Border Force, where 70% of Welsh staff attended, received some very positive feedback from the attendees.

14. Addresses the concerns of staff about Leadership and Management of the region.

14.1 The Agency accepts this recommendation.

14.2 The UK Border Agency takes the issues raised very seriously within Immigration Group, the region's senior management team are actively engaged in working together to address the more serious comments that gave rise to the concern. The region is also ensuring there are safe routes for all staff to take their concerns. Some changes have already been made that we feel will deliver the recommendations relating to the more serious issues and more is being done. For example, we aim to work closely with staff to understand the precise nature of the issue. To achieve this we have engaged with *the Network*, which is the support group for Home Office black and minority ethnic staff, who have been conducting surveys for staff to understand what their perceptions are. We will follow this up by offering 'safe' workshops or interviews using a trusted independent facilitator. However, understanding the extent of the issue is especially important as the recent Home Office survey does not capture the issue in the same way, with a figure of 10% of staff (out of a return rate of 94% in the region) identifying discrimination, bullying and harassment as being an issue for them. We would also welcome further information from the Chief Inspector to ensure we are addressing the specific concerns of staff.

14.3 The Agency is pleased to have received some positive feedback about visibility of managers, given the geographic challenges the Wales and South West of England region faces, The region has accepted that it could increase visibility and engagement further, and is currently working with the Communications Officer and LIT leaders with a view to increasing the visibility of managers relevant to the staff.

15. Ensures that all staff have the training to equip them to fulfil their roles efficiently and effectively.

15.1 The Agency accepts this recommendation.

15.2 The key roles in Enforcement demand formal, structured training. Inevitably, due to the specialist nature of the role, delays will be experienced in securing such courses as these are centrally-managed and run only when demand makes them viable. The nature of such roles, and others within Enforcement, does mean that mentoring is a necessary part of becoming proficient.

15.3 We have already identified and formalised a programme of induction to coincide with new staff. There remains a balance between staff undergoing an induction programme soon after arrival and the viability of a programme with regard to numbers.

15.4 Within Border Force there has been an ongoing programme of cross training to enable officers to carry out both immigration and customs functions.

16. Complies with the annual appraisal process, ensuring appraisals are completed on time and to standard.

16.1 The UK Border Agency accepts this recommendation.

16.2 The UK Border Agency welcomes the Chief Inspector's finding that staff on the whole confirmed they had received formal Performance and Development Reviews (PDRs) at the time of the inspection. The Wales and South West of England region's PDR completion rate for 09/10 is very high with only those on extended absence periods outstanding. However we need to ensure all PDRs are opened in a timely manner and all interim meetings are recorded on the on-line reporting system (Adelphi) during the reporting year.

16.3 The Agency recognises the importance of the PDR process in managing and developing staff, and include a 'management' objective relating to the opening, reviewing and closing of the PDR process in time, and to the appropriate quality. PDRs are now completed on Adelphi which allows managers to keep track of the status of PDRs for all of their staff.

17. Implements an effective communications strategy within the region.

17.1 The UK Border Agency accepts this recommendation.

17.2 The improvements to be made to the way we engage with our partners is illustrated with regard to the Chief Inspector's findings in Recommendation 2. We will continue to engage our corporate partners in our planning activities and in national consultation exercises, and accept that we and our South West partners would benefit from further engagement.

The Wales and South West of England region in Immigration Group now have a Communications Officer. From the 'all-staff' events held in March we are clearer what communication, both in terms of content and type, our staff would like. The use of our local intranet is pivotal to us making improvements in this area, and this is an area the Communications Officer is developing as a priority, that will be live within weeks. The Agency has been upgrading the portal to enable communication in the region in the way that staff have requested. In the meantime, we have introduced a weekly briefing, the Regional Director is holding monthly coffee mornings at the two biggest offices to talk to staff about issues of concern or interest to them, and is continuing with visits and surgeries at all offices. In addition the regional director has commenced with an 'Ask Jane' page to encourage two-way dialogue. We will of course keep reviewing all of these ways of communication and engaging.