



**Smarter Regulation of Waste in Europe
(LIFE13 ENV-UK-000549)
LIFE SMART Waste Project**

Action B2:

Intelligence Gathering Strategy

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1.0 Introduction

“There is no phase of the intelligence business that is more important than the proper relationship between intelligence itself and the people who use its product. Oddly enough, this relationship, which one would expect to establish itself automatically, does not do this. It is established as a result of a great deal of persistent conscious effort, and it is likely to disappear when the effort is relaxed.” (Kent, 1949)¹

1.1 The Purpose of the Intelligence Gathering Strategy

The purpose of the Intelligence Gathering Strategy is provide a high level vision of the LIFE SMART Waste Project’s information collection, research and analysis approaches to deliver valuable and usable intelligence on waste crime. It will support the design and deployment of lasting and effective waste crime prevention and intervention strategies.

This strategy is not a single static document but will be reviewed throughout the project and will be organic in responding to changing requirements.

1.2 The Context of the Intelligence Gathering Strategy

Waste criminals are operating faster, more flexibly and efficiently in a more integrated and connected world.

The detection and disruption of waste crime by environmental regulators can be restricted by organisational, regional and national boundaries.

Waste crime and enforcement teams are required to work across boundaries seamlessly and regularly in order to maintain, improve and enhance the campaign against waste crime.

Information and intelligence are one of the project’s most valuable assets and will drive a new approach to cross-boundary collaborative working.

This strategy will showcase the innovative use of networked technologies in identifying and tackling national and international to waste crime. It will co-ordinate, drive and information national and international responses.

1.3 The Benefits of an Intelligence Gathering Strategy

There are several benefits to the project from the agreement and adherence to the Intelligence Gathering Strategy:

- the development and delivery of a complete strategic project
- improved data quality and intelligence for all participants
- improved range of information and intelligence available to all partners
- improved analysis and intervention of waste crime

¹ Kent, S. (1949). *Strategic Intelligence for American World Policy*. Princeton: Princeton University Press.

2.0 Principles and Objectives

The guiding principle of this Intelligence Gathering Strategy is to establish collaborative information-sharing and problem solving approaches to deliver intelligence about waste crime.

2.1 Strategic intelligence

The primary focus of the strategy is to provide *strategic intelligence* about waste crime as opposed to *operational* or *tactical intelligence*.

This means we will focus upon the *drivers* and *causes* of waste crime rather than the collection of personal and private information about the activities of waste criminals. Without comprehensive information from as many sources as possible, it is extremely difficult either to understand the strategic drivers of waste crime or design the most effective interventions.

2.2 Collaboration

Partnership working will be established as the principal way of delivering our shared outcomes. We will collect information from as many regulatory, law enforcement and non-law enforcement partners as possible. We will establish for the first time routine industry co-operation as a fundamental component in collaborative information exchange and interventions design. We will work with the industry at boardroom, executive and owner level to achieve change.

2.3 Communications 'Hub'

We will establish an innovative communications Hub to drive and support collaboration, open information sharing and innovation. The Hub will provide a mechanism which will allow environmental regulators to move away from traditional and bureaucratic information-sharing procedures.

The Hub will provide, for the first time, a European waste crime strategic communication and problem-solving opportunity to develop collaborative prevention and intervention responses. It will support the design of recommendations for regulatory, legislative and public policy changes.

The Hub will aim to become recognised as a hub of excellence and as an accessible gateway to subject knowledge expertise in waste crime prevention, acknowledged best practice and collaborative problem-solving.

The Hub will establish *communities of interest* to provide virtual and secure workspaces to analyse and problem solve issues of common concern around waste crime and challenging waste streams. These *communities of interest* will empower all participants to act as a single analytical team contributing to the production of strategic waste crime intelligence products.

Participants will have the freedom to engage in open debate in the Hub. We will establish a rule that allows all participants to share and use information, participate in collaborative problem solving and engage in open debate in these *communities of interests* without any risk of identification outside of the project.

3.0 The Intelligence Framework of the LIFE SMART Waste Project

3.1 The Structure of the Intelligence Framework

The LIFE SMART Waste Project is establishing a waste crime strategic intelligence gateway for collaboration and problem-solving.

We will deploy a virtual, networked Hub to deliver the principles and objectives of the Intelligence Gathering Strategy and provide a location for simultaneous intelligence collection, analysis and production.

The Hub will not create large databases of centralised data of regulatory or enforcement data.

It will offer an engaging and innovative platform for real-time discussion and problem solving by providing collaborative real-time communication, web-conferencing and work-space facilities.

We will establish a *Waste Wiki* to provide a forum for all users collaboratively to discuss, communicate and constantly update cumulative knowledge on waste crime issues.

We will also establish a second, physical component composed of project team staff with the declared aim of providing a focal point to support international intelligence exchange and waste enquiries.

This secondary component of the hub will have no systems connection with the virtual hub and will instead be composed of project staff based within the Scottish Crime Campus.

It will act to identify and connect across Europe appropriate waste specialists and intelligence officers with areas of mutual interest and concern.

Formal intelligence exchange at this level will be facilitated through established secure mechanisms agreed between agencies to agreed national and international standards.

3.2 The Functioning of the Intelligence Framework

The Intelligence Gathering Strategy adheres to the general principles of the UK National Intelligence Model and will function by establishing processes in four key areas which govern participant interaction and use of the Hub.

3.2.1 Key area 1: Tasking – how will we identify the gaps in our knowledge?

It is increasingly agreed by environmental regulators that the relevance and extent of waste crime across the UK and Europe has grown significantly in recent years.

Waste crime can mean different things to different people. It can mean non-compliant and unregulated activities as well as the deliberate flouting of the law, often involving organised crime, associated with other crimes such as tax evasion, money laundering and fraud.

By *tasking*, this strategy means the process by which we will identify the gaps in our knowledge – also known as intelligence requirements – about what constitutes waste crime and the method by which these gaps are circulated to all participants to help answer.

This strategy will raise strategic intelligence requirements and will seek data and information from participants to fill key gaps in our knowledge of the factors causing waste crime.

Our first strategic intelligence requirement will establish, as its central focus, crime prevention and vulnerability approaches.

This means that we will seek to identify the structural, economic and other factors that encourage waste crime activities.

We will identify specific points of vulnerability in the waste management industry and identify the best opportunities for the detection of and response to waste crime.

We will also seek information and intelligence from participants on their own priority waste crime issues and challenging waste streams.

What sorts of questions do we want to answer?

We will raise strategic intelligence requirements to identify those factors stemming from the waste market that encourage, support or allow waste crime.

We will apply economic sector vulnerability analysis to identify weaknesses and limitations that present opportunities for criminal exploitation.

We will use this approach to assess the waste sector in general as well as individual challenging waste streams and we will consider all vulnerabilities including where these impact upon current regulatory, enforcement and legislative approaches.

This approach will allow us to develop a deep knowledge of the moments of criminal opportunity in the waste market which are being exploited by waste criminals and to respond by designing and implementing prevention measures that protect the market.

Some of the questions this strategy will answer include:

- What are the most challenging waste streams?
- What characteristics of these waste streams make them vulnerable to crime?
- Is the waste market being infiltrated by organised crime?
- How do we define and measure this?
- What is the relationship between the legitimate waste industry and the illicit industry?
- Is the waste sector a high-risk market for crime, or does it contain instead only some high risk waste streams?
- What is the experience and perception of the waste industry to waste crime?

The strategic intelligence requirement is dynamic and will be reviewed regularly in order to account for emerging issues and the changing priorities of participating partners.

3.2.2 Key area 2: Collection - How will we collect the information to fill the gaps in our knowledge?

By *collection*, this strategy means the methodologies by which participating agencies will collect the data required to fill the strategic intelligence gaps raised by the project team and communicated through the Hub.

Data collection is generally concerned with collecting information about regulatory activities and enforcement actions. The nature of waste crime means that few real incidents are likely to be reported to environmental regulators or law enforcement agencies.

This strategy therefore will not seek to collect data about regulatory enforcement activities or the scale of non-compliance.

Instead we will collect data to better understand criminal activity and behaviours and we will build profiles of illegal activities to better understand the commissioning of waste crimes.

We will tailor intelligence collection towards specific topic-based intelligence requirements.

The strategy will at all times seek new groups and types of information and intelligence to better understand waste crime. We will use a range of data types including waste audit data, academic research, management and performance information, economic and social data, competitive intelligence analysis and, when appropriate, industry data.

In order to drive engagement, collaboration and timely progression of the project, strategic intelligence requirements will be aligned with an *intelligence collection plan* detailing ownership, deadlines and assessments of data reliability.

The project team will create and maintain the intelligence collection plans for each intelligence requirement and will be responsible for the regular updating of this plan so that users have a current record of the progress of each request.

3.2.3 Key area 3: Analysis – How will we derive meaning from our collected information?

The purpose of data collection ultimately is to derive a better understanding of waste crime and its causes.

We will analyse our data to elicit the contributory factors that give rise to waste crime, as well as identify specific points of vulnerability that offer us the best opportunities for detection and intervention.

By *analysis*, this strategy means the processes by which raw intelligence and data is transformed into the insights and judgements we need to enhance our understanding of waste crime and identify opportunities for prevention or intervention.

The strategy will use innovative critical thinking and collaborative techniques as the basis of the analysis conducted in this project.

The use of collaborative analytical techniques will guide mutual exchange and reasoning, eliminate cognitive biases, and account for potential competing perspectives across all participants. These techniques will demand transparency by considering all differences of opinion.

3.2.4 Key area 4: Dissemination – How will we make our work useful to others?

By *dissemination*, this strategy means the process by which the results of intelligence analysis are shared between partners on either a one-off or an ongoing basis.

The sharing of information and intelligence between all partners will play a vital part in identifying and tackling waste crime but it will not be shared without restraint.

Regular and meaningful information exchange between project partners will only occur if users have confidence that increased sharing is accompanied by protections to assure that information is used in an appropriate manner.

This strategy establishes a framework which supports collaboration and encourages partners to seek out, identify and locate relevant information but will do so while protecting against data misuse.

How will we protect against data misuse?

We will protect our data by adhering to the following principles:

- information and intelligence will only be accessible to authorised hub users
- authorised users will have defined information access rights and restrictions
- no personal or sensitive will be sought or collected in the hub
- if users have a requirement to pass personal or sensitive information to a partner agency, the hub will facilitate exchange by identifying the most appropriate mechanisms of transfer but will not act as the transferee
- information collection will be initiated only in response to specific intelligence requirements of the project
- information and intelligence submissions from hub users will meet baseline requirements of a checklist to protect against the submission of personal or otherwise sensitive information. Users are required to adhere to these requirements prior to the submission of data to the hub.
- all submissions to the hub will be collected in a holding area prior to a secondary check by members of the project team. Once agreed, the information will be made available to appropriate project participants in a shared area for subsequent viewing and to support analysis.

4.0 Addendum (1 March 2019)

4.1 The Purpose of Addendum

As stated in Section 1.1, the project's Intelligence Gathering Strategy is not a single static document and is subject to ongoing review.

This addendum outlines updates to the strategy arising from a review completed in March 2019.

4.2 Communications Hub

At the time of writing, innovative solutions to deliver the envisaged benefits of the LIFE SMART Waste project's communications hub ('Hub') as outlined in Section 2.3, are in progress.

4.3 Cross Border Flagging Database (XBFD)

The LIFE SMART Waste project is designing and developing a 'Cross Border Flagging Database' (or 'XBFD') to support collaborative efforts to tackle waste crime undertaken by environmental authorities within the UK. This system is an extension of the current SEPA secure iBase template with existing secure access arrangements. The system will take the form of a networked online facility connecting UK environment agencies. It will allow each agency equal access to input and view details of entities pertaining to suspected cross-border criminals or companies. The system facilitates a data wash, identifying which, if any, other agencies hold data on those entities. This will prompt those agencies to request and share intelligence in the normal manner, with a view to filling intelligence/evidence gaps and coordinate activities. This aligns to the collaborative approach of the existing Communications Hub, using real-time communication to identify and tackle issues of mutual concern.

The system is physically located on a secure network, which is currently accredited to store sensitive material. Remote web-based access is also done with the use of secure protocols. This system is also compliant with the legal requirements for data protection and confidentiality.

4.4 Open Source Research

The Life SMART Waste project is developing an internet capability for intelligence gathering using two open source researchers. These researchers will lead and support the development and implementation of open source tools and techniques to investigate criminality within the waste industry. The primary focus of this open source internet capability will be:

- To monitor and identify the influence and use of cyber waste markets in illegal waste crime movements. Incorporated within this will be the development of 'big data' intelligence gathering tools and techniques to identify trends in cyberspace.
- To build capacity to undertake tactical intelligence gathering on suspicious activity.

4.5 SIENA System

SEPA and the Life Smart Waste Project have accessed Europol's Secure Information Exchange Network Application (SIENA). This is a state-of-the-art platform that meets the communication needs of EU law enforcement. The platform enables the swift and user-friendly exchange of operational and strategic crime related information among Europol, EU

Member States and third parties. SIENA ensures the secure exchange of sensitive and restricted information.

SEPA is the only UK environment agency to secure access to this system. It is anticipated that this will contribute to a European waste crime strategic (and operational) communication and problem-solving opportunity to develop collaborative prevention and intervention responses.

SIENA is compliant with all the legal requirements for data protection and confidentiality.

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