

EXPLANATORY MEMORANDUM ON EUROPEAN UNION DOCUMENT  
COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN  
PARLIAMENT AND THE COUNCIL

THE EU COUNTER-TERRORISM POLICY: MAIN ACHIEVEMENTS AND  
FUTURE CHALLENGES

Submitted by the Home Office on 16 August 2010

**SUBJECT MATTER**

1. This Commission Communication takes stock of the main legislative and policy achievements at the EU level in the fight against terrorism. It provides an assessment of the current EU Counter Terrorism Strategy under each of the four strands; Prevent, Pursue, Protect and Respond as well as providing a section on "Horizontal issues". The Communication goes on to address the main challenges under each section and the Commission's plans for tackling them in the future.
2. The Commission has also released a staff working paper, "Taking stock of EU Counter Terrorism Measures" which provides more details of the work underlying the policy areas discussed in the Communication.
3. The main areas of work that the Communication identifies for the future are as follows:
  - a) **Prevent:** The Commission intends to launch a Communication in 2011 which will look at the experience of member states in countering radicalisation and recruitment linked to terrorism. This will be used to review and update the EU strategy and action plan.
  - b) **Protect:** The Commission will continue to work to enhance transport security through deployment of new technologies to defeat terrorists' efforts to escape detection. They will also work to ensure an effective security research policy by strengthening the links between interested parties.
  - c) **Pursue:** The Commission wishes to determine 'the right way' to establish a European policy for the use of Passenger Name Records (PNR) data to combat terrorism and organised crime. The Commission will also prepare

a legislative proposal for a comprehensive regime on obtaining evidence in criminal matters.

- d) **Respond:** The Commission plans to further develop the EU's role in crisis and disaster management, in particular by developing the EU rapid response capacity based on existing instruments for humanitarian aid and civil protection. The Commission also plans to establish the implementing arrangements for the Solidarity Clause, a mandatory mechanism introduced in Article 222 of the TFEU.
- e) **Horizontal Issues:** The Commission has prioritised ensuring that any EU legislation and actions comply with the Charter of Fundamental Rights. The Commission will further develop cooperation channels and mechanisms with External Partners, particularly the US, with a focus not only on internal security but also on third countries such as Afghanistan. The Commission will also make proposals on funding for the post 2013 period in the context of the next multi-annual financial framework and will consider the feasibility of setting up an Internal Security Fund.

#### **SCRUTINY HISTORY**

- 4. None for this document. However, a number of subjects discussed in this Communication were the subject of previous Home Office Explanatory Memoranda in their own right. For example, the EM related to "Communication from the Commission to the European Parliament and the Council on Strengthening Chemical, Biological, Radiological and Nuclear Security in the European Union – an EU CBRN Action plan (Document 11480/09 + two Addenda)". The EM was submitted to the Parliamentary Scrutiny Committees on 14 September 2009. The Commons European Scrutiny Committee cleared the Action Plan on 14 October 2009. It was cleared by the Lords European Union Committee on 4 November 2009.

#### **MINISTERIAL RESPONSIBILITY**

- 5. The Home Secretary has overall responsibility for Counter Terrorism policy. The Secretary of State for Transport has responsibility for outbound protective transport security and regulates the aviation, maritime and international rail sectors accordingly. The wide-ranging nature of this Communication also means that it touches on Ministerial responsibilities in the Foreign and Commonwealth Office, HMRC, Ministry of Justice, Cabinet Office and Department for Business, Innovation and Skills.

#### **INTEREST OF THE DEVOLVED ADMINISTRATIONS**

- 6. The UK's Counter Terrorism policy is a reserved matter under the UK's devolution settlements. The devolved administrations have however been consulted in the preparation of this EM.

## LEGAL AND PROCEDURAL ISSUES

### Legal basis

7. Not applicable to this Communication. The Communication is a non-legislative statement of policy in response to a request from the European Parliament.

### European Parliament procedure

8. Not applicable to this Communication. The Communication is a non-legislative statement of policy in response to a request from the European Parliament. The Communication is likely to be discussed in the LIBE Committee followed by a plenary session.

### Voting procedure in the Council

9. Not applicable to this Communication. The Communication is a non-legislative statement of policy in response to a request from the European Parliament. The Communication may be discussed in Council.

### Impact on United Kingdom Law

10. None as no legislation is proposed directly in this Communication.

### Application to Gibraltar

11. None as no legislation is proposed directly in this Communication.

### Fundamental Rights Analysis

12. No fundamental rights issues arise as a direct result of this Communication.

## APPLICATION TO THE EUROPEAN ECONOMIC AREA

13. Not applicable to this Communication.

## SUBSIDIARITY

14. No subsidiarity issues arise as a direct result of this Communication. Action at the EU level plays a valuable role in Counter Terrorism policy by enabling us to act where we cannot act alone. We also believe that EU activity usefully improves the capability and capacity of EU Member States by setting a baseline standard for all Member States. However, as the Communication acknowledges, Member States are the main actors in this sensitive policy area, and much of CT policy will continue to fall under Member State competence as a matter of national security. CT policy

also need to continue to reflect the range of different historical, ethnic and security circumstances involved within each Member State.

### POLICY IMPLICATIONS

15. The Commission Communication identifies that the threat from terrorism remains 'significant'. Although no large-scale terrorist attacks have been successfully conducted in the EU since July 2005, a number of terrorist plots have failed or been disrupted by Members States' police forces and Security Services in that time. We support the Commission's assertion that the EU and its Member States must remain alive to, and be able to respond effectively to, the evolving and diversifying terrorist threat.
  
16. The Government welcomes the Commission Communication as a summary of the Counter Terrorism policy areas to which the EU has contributed since the 2005 EU Counter-Terrorism Strategy was launched. The Communication also acts as a useful sign post for the future direction of EU CT policy under each of the four strands: Prevent, Protect, Pursue and Respond. We have highlighted where there are indications in the Communication that the Commission intends to make new legislative proposals. On publication, each such proposal will be the subject of a separate Explanatory Memorandum and scrutiny.

#### **Prevent:**

#### Main Achievements

17. Amended framework decision: We note that the 2008 Framework Decision which amended the Framework Decision 2002/475/JHA on combating terrorism is now in force. The 2008 Framework decision dealt more specifically with prevention aspects, requiring Member States to introduce national provisions to criminalise certain acts (public provocation to commit a terrorist offence; recruitment for terrorism and training for terrorism). **There is no indication in this Communication of any further amendments to the Framework Decision.**

#### Future Challenges

18. Radicalisation: The UK welcomes the Commission's intention to draw out best practice by canvassing Member States for their experiences in countering radicalisation and recruitment linked to terrorism. The UK contribution will be able to draw on our wide experience of counter and de-radicalisation, delivery of programmes through local partners (including NGOs and community organisations), countering extreme ideologies through the promotion of alternative voices and working with international

partners and third countries to tackle the threat of violent extremism. The Commission's initiative coincides with the UK Government's commitment to conduct a review of Prevent, which will include an examination of the effectiveness of the current Prevent Strategy and the activities that have been completed under each of the objectives. It will report its findings by the end of 2010. We look forward to sharing the results of the review with the Commission. **The Commission intend to launch a Communication in 2011 which will look at Member State experiences in countering radicalisation. There is no indication at this stage that it will contain any legislative proposals.**

19. Internet: The UK recognises that the internet is a key enabler for terrorist activity and supports the Commission in its practical efforts to ensure member states are able to deal effectively with illegal internet content that supports terrorist activity. We are content that good procedures already exist between UK law enforcement agencies, and the private sector in this area. We would welcome training that promotes these procedures in other EU Member States. **This Commission proposal is based on voluntary, practical cooperation.**

**Protect:**

#### Main Achievements

20. Border security: The UK does not participate in any of the immigration aspects of Schengen and will not be required to implement any of the Visa Information System (VIS) or Schengen Information System (SIS) Regulations; although we maintain an interest in developments with the clear intention of maintaining the integrity and security of our own border controls. We are obliged to implement the Police elements of the second generation SIS (SIS II) but will remain excluded from the immigration parts. The UK has been excluded by the Commission from participating in the law enforcement (police access) aspects of VIS. This is because the Regulation has been characterised as a Schengen-building measure that builds upon the short-term visa/immigration part of the Schengen Acquis in which the UK does not participate. The decision to exclude the UK means that we are unable to access immigration data and, perhaps more importantly, access what is likely to become one of the world's largest biometric data bases. The UK are currently challenging their exclusion in the Court of Justice of the EU. **There is no indication in this Communication of any further legislative proposals to enhance border security. However, we are aware that the Commission is planning work in this area (see separate EM on EU document 12579/10).**

21. CII and Cyber Security: The UK supports the Commission's approach to Critical Information Infrastructure Protection (CIIP) which aims to enhance levels of resilience and increase the capacity to respond to and counter cyber attacks. This will be achieved through various EU initiatives including: encouraging Computer Emergency Response Teams (CERT) in all EU Member States, the European Information Sharing and Alert Systems and planning for the European cyber exercise in November 2010. As part of this the Commission will also be working with industry to enhance resilience through the European Public and Private Partnership for Resilience (EP3R). The UK has been actively involved with this work, as well with the new European Forum for Member States (EFMS), a policy forum which aims to progress high-level policy work on CIIP and cyber security – including an initiative on resilience and stability of the internet. **The UK has been involved in the ongoing voluntary collaboration across all EU Member States**, which has enhanced cyber security and resilience across the EU since the publication of the Communication in March 2009. This is particularly important as the Internet network does not recognise national boundaries making the system only as strong as its weakest link. The UK is in a strong position to influence thinking in this area to enhance security.
22. Transport security: After the failed bomb attack on a plane from the Netherlands to Detroit, the UK has been working more closely with European partners on sharing of data and results of security scanner systems. The latter is largely based on the Common Testing Methodology which the UK has played a key part in developing. The Communication on Security Scanners at EU airports mentioned in this Communication has been the subject of a separate Explanatory Memorandum. **There is no indication in this Communication of any further legislative proposals in the field of Transport Security.**
23. Explosives: We welcome the significant achievements on enhancing the security of explosives at the European level, most notably the traceability Directive. We continue to work with the Commission on measures to control the marketing and use of explosives precursors. **The Commission will be producing a separate legal proposal on explosives precursors before the end of the year which will require an Explanatory Memorandum.**
24. Security Research: The UK has actively supported the promotion of an effective security research policy through the EU 7<sup>th</sup> Framework Programme and its processor programme "Preparatory Action for Security Research" in order to promote improved customs controls and facilitate legitimate trade at the border. The UK continues to be a driving force in developing the security of the international supply chain and has worked with the World Customs Organisation to bring Customs authorities,

industry and suppliers together to consider the use of Container Security devices in securing trade lanes. **This Communication gives no indication of planned changes to security research but draws our attention to a report due at the end of the year which will provide the latest thinking in this area.**

25. European Critical Infrastructure Protection (EPCIP): The Commission previously issued a Directive on EPCIP in the energy and transport sectors which has had little impact on the UK, as no qualifying Infrastructure has yet been identified in the UK. **The Commission has now suggested that the Directive be extended. This could be of concern to the UK, especially if it seeks to increase EU powers into an area of national competence. The UK will therefore oppose any extension of the Directive without evidence of significant benefit. The opt-in does not apply in this case; future negotiations will be decided by co-decision and QMV.** The outcome of the review of the Directive in the energy and transport sectors (due in 2012) will help determine UK policy.
26. Critical Infrastructure Warning and Information Network (CIWIN): The Commission continues to work on CIWIN, a computer application that allows Member States to share information on Critical Infrastructure Protection. **As it will be voluntary for each Member State, if the UK sees no benefit, it will not need to provide facilities to access the system.**
27. European Reference Network for Critical Infrastructure Protection (ERN-CIP): Commission work on ERN-CIP is being developed to extend the availability of Critical Infrastructure Protection research and testing facilities to MS. **Proposals for the way forward in a Road Map are being finalised, and so it is too early to say whether the UK will benefit.**
28. 3<sup>rd</sup> Country Critical Infrastructure Protection: **The Commission work coordinating EU-level dialogue with 3<sup>rd</sup> countries on Critical Infrastructure Protection issues must not interfere with existing bi-lateral arrangements.** To date, this dialogue has consisted of a joint EU/US information sharing workshop on Critical Infrastructure Protection in Madrid in March 2010.
29. Supply Chain Security: The UK was a leading member of the taskforce that created the World Customs Organisation's (WCO) Framework of Standards to Secure and Facilitate Global Trade aimed at improving the security of the international supply chain. We support the EU commitment to implement these standards. The UK was also a leading member of the taskforce that proposed the amendments to the EU Community's Customs

code. The UK fully endorses these amendments which mean cargo movements receive lighter touch control leaving customs to concentrate their resources on higher risk traffic. We are satisfied that these initiatives will make it more difficult for terrorists to use legitimate trade routes for their activities. **There is no indication in this Communication of any further legislative proposals in the field of Supply Chain Security.**

#### Future Challenges

30. Transport Security: The UK assesses that Commission proposals to enhance transport security through deployment of new technologies are consistent with the pace and direction of development of policy in the UK. **There is no indication in this Communication of any further legislative proposals in the field of Transport Security, though there is the suggestion of further practical cooperation in the area of new detection technologies.**
31. Research Community: The UK has been instrumental in encouraging the Commission to establish a technology forum to enable EU Member States to compare experience, knowledge and facilitate joint testing and the establishment of common requirements for detection technology to ensure effectiveness and value for money in the procurement of new technology. We have also been working with the WCO to set up a group of customs authorities together with industry and suppliers to consider the use of Container Security Devices in securing trade lanes. **These arrangements are purely voluntary.**

#### **Pursue:**

#### Main Achievements:

32. The European Arrest Warrant (EAW): The EAW was given effect in the UK by Parts 1 and 3 of the Extradition Act 2003 (as amended) and came into force on 1 January 2004. The Government has committed to reviewing the operation of the UK's extradition arrangements worldwide. The purpose of the review is to ensure that the UK's extradition arrangements operate effectively and in the interests of justice. A range of options as to how the review will be undertaken are being considered and the Government will make an announcement in due course. **There is no indication in this Communication of proposed changes to the EAW.**
33. European Investigation Order (EIO): The EIO will repeal and replace the European Evidence Warrant Framework Decision once it has been adopted. **Negotiations have only just commenced and the UK opted in on 27 July 2010.**



34. Money Laundering: HM Treasury and the Home Office have fully transposed the 3<sup>rd</sup> Money Laundering Directive, principally by the Money Laundering Regulations 2007. The UK has also implemented national enforcement powers to ensure the EU Regulations on Cash Controls and Funds Transfer (Wire Transfer) are complied with in the UK. The Payments Services Directive was implemented in the UK by the Payments Services Regulations 2009 (FATF SR 6 & 7). **There is no indication in this Communication of any further developments in money laundering legislation.**

The following comments are restricted to policy and legislative issues contained in the Staff Working Plan:

35. UN Sanctions: The UK fully supports the measures taken by the EU to take account of the due process concerns identified by the ECJ in its ruling on Kadi in September 2008 for all listed persons and entities under the UN AQ and Taliban sanctions regime. Commission Regulation 1190/2008 allows listed persons to request the reasons for their listing and to make their views about the reasons known to the Commission. If the individual listed challenges their listing under UNSCR 1267 through the European Commission, the European Commission is required to undertake a review of the UN held information supporting that listing. Since the Supreme Court Judgment in the case of Ahmed and Others vs. HM Treasury in January 2010, the UK implements UN AQ and Taliban asset freezes through Council Regulation 881/2002 as amended by Regulation 1286/2009. The Al-Qaida and Taliban (Asset-Freezing) Regulations 2010 provide penalties for breaches of the prohibitions in the Council Regulation together with a full licensing regime and information gathering powers. The UK has also contributed to, and been a strong proponent of, advances in due process in the 1267 regime, including the appointment of an Ombudsperson to assist the UN Sanctions Committee with petitions for delisting from individuals and entities. **There are no plans to change the current Regulation.**
36. Alternative payment systems: The UK fully recognises the risk of abuse that new and alternative payment systems present (payments via the internet, prepaid cards, mobile payments) and would welcome wider EU cooperation in this area.
37. Charities: Abuse of charities for terrorist purposes is not assessed to be frequent, but is completely unacceptable. The Charity Commission for England and Wales leads on regulation of the charity sector in the UK and has a developed counter-terrorism strategy. The UK believes that preventing abuse of the non-profit sector is a key part of work to counter terrorist financing. We therefore welcome European engagement to raise

awareness of the risks posed in this area. **The Commission plans to publish voluntary guidelines for Non-profit organisations (NPOs) to address the threat of potential abuse by BPOs for terrorist financing purposes.**

38. Cash: Travellers carrying the equivalent of 10,000 Euros or more in cash are required to declare this at the border when entering or leaving the EU. Officers can seize cash they suspect is being used for Terrorist Financing or Money Laundering and apply for Civil Forfeiture in a magistrate's court. **This requirement was introduced by EU regulation 1889/2005.**
39. Gift aid: The UK is concerned about the abuse of the Gift Aid system by fraudulent charities. Charities and their trustees are subject to a "fit and proper" test built on the principles of the Money Laundering Regulations (MLR) registration system. New procedures set out in the March 2010 Budget allow HMRC to deny payments to high risk entities and includes deregistering or rejecting charities for tax purposes. **There is no indication in this Communication of any future developments in this field.**

#### Future Challenges:

40. Passenger Name Records (PNR): The UK supports the swift publication of an EU-wide PNR Directive. We would like the Directive to include provision for PNR data collection and analysis from intra-EU journeys. We know that the ability to collect and process PNR data is vital to improving security and ensuring the safety of passengers. If we do not collect data on intra-EU routes we will be in the illogical position of making internal EU travel less safe than travel outside the Union. **The Commission will publish the Directive in 2011, at which point it will be the subject of a separate Explanatory Memorandum advising on the full impact on Competence. The Directive will undergo domestic scrutiny and will be subject to the JHA opt-in.**
41. Terrorist Financing: The UK already has a well developed Counter Terrorist financing strategy. **We welcome any action to increase practical coordination and cooperation on Terrorist Financing in Europe.**

#### **Respond:**

42. Evaluation of National Crisis Response capacities: The UK supports the Peer Evaluation Process which aims to share best practice amongst EU Member States and to ensure that EU Member States' CT legislation is robust. Following a UK recommendation it was decided that the focus of the second round of evaluations should be on Member States' ability to

prepare and respond to a terrorist attack. The UK exercise was jointly held by the Home Office and Cabinet Office. **The arrangements to share best practice in this field were undertaken by practical cooperation rather than legislative measures.**

43. CBRN: We support the work on the CBRN Action Plan which aims to reduce both the impact and the likelihood of the terrorist use of CBRN materials. The Action Plan covers both Protect (e.g. security of materials) and Respond (e.g. emergency planning) elements. Implementation will require continuing commitment from subsequent Presidencies of the EU and clear governance processes for monitoring progress made under the Action Plan. Fully successful implementation of the Plan will require the Commission to maintain an overview of all CBRN-related activity across the various EU Directorates-General and to have a clear forward path for the priority actions listed in the plan. **The Action Plan is a non-legislative proposal.**
44. Solidarity with victims of terrorism: The Framework Decision on the standing of victims in criminal proceedings covers support for victims throughout the criminal justice process. **The UK has implemented this measure.**
45. Compensation for victims: The Council Directive relating to compensation to crime victims only deals with compensation for victims of crime where there is a cross-border element. **The UK currently complies with this Directive through the existence of the Criminal Injuries Compensation Scheme.**
46. Plans for a new Instrument for victims: The EU Commission is currently working on an impact assessment, focusing on victims' rights, which will examine the feasibility of a single, comprehensive legal instrument merging Directive 2004/80 on the compensation to victims and the Framework Decision on the standing of victims in criminal proceedings. **The UK's opt-in will apply to any future legal instrument in this area.**

#### Future Challenges

47. EU Rapid Response Capacity: The Commission is preparing a Communication on EU Disaster Response Capacity for adoption in November 2010. Initial Commission thinking during the consultation phase includes a voluntary pool of assets pre-committed by Member States; EU-funded assets complementary to those of Member States; pre-positioning of humanitarian aid; EU-level assistance to transport and logistics issues; and strengthening the Monitoring and Information Centre's coordinating functions. The UK would resist any move to introduce a legal presumption that Member States will pre-commit disaster

response assets for EU deployment thereby limiting their right to decide how such assets should be deployed. Furthermore, **the UK would resist extending Commission competence to include command and control of Member States' assets or to include operational coordination within the EU unless at the request of the host nation authority or under the overall coordination of the United Nations.** We will press the Commission to link their proposals to their 2012 cross-sectoral overview of major risks faced by Member States and emphasise that future proposals to strengthen EU response capacity should be funded from existing EU budget lines.

48. Solidarity Clause (Article 222): The Communication calls for the implementing arrangements for the Solidarity Clause (Article 222) to be established quickly. The Clause expresses the political will of Member States to assist each other in natural and manmade disasters by all means at their disposal, including military; and to coordinate between themselves in Council. The UK view is that the Clause has no legal significance in that it will not enable Member States to do anything which they could not otherwise do under existing legal bases; and that Member States have discretion in deciding how to respond to the obligations enshrined in the Clause and in Protocol 37 to the Treaty; but the implementing arrangements could define the extent of any constraints on this discretion. **The UK will continue to interpret the Clause rigorously and defend the UK's freedom to decide how to respond to any calls for assistance under this Clause.**

#### Horizontal Issues:

49. Fundamental Rights: The UK supports the Commission's assertion that respect for fundamental rights and the rule of law should be at the heart of the EU's approach to countering terrorism.
50. External Partners: We support the Commission's efforts to develop greater practical cooperation between the EU and external partners in areas which complement our own CT efforts and where EU resources can act as a multiplier. The data sharing work with the US is paramount though we note that the Passenger Name Record (PNR) agreement is still provisional. The EU wishes to reopen negotiations on PNR whilst the US does not. This may create friction in the US –EU relationship and temporarily remove access to this data. We welcome EU engagement in developing CT capability in third countries, and in particular Pakistan, Yemen and the Sahel. We support the EU Counter Terrorism Coordinator and his activities which have been instrumental in helping to gain EU funding under the Instrument for Stability (IfS) for CT programmes in Pakistan, Somalia and the Sahel. For example, the UK encouraged the Commission to support the development of CT strategy and research in

Pakistan, allocating some 12 million pounds sterling from the IfS. We are working with other Member States and the Commission to identify projects in Somalia and East Africa to help improve security in the region.

51. Funding: The current JHA budget is approximately 0.78% of the overall EU budget and funds five key workstreams: solidarity and migration, security and safeguarding liberties, fundamental rights, justice in civil and criminal matters and drugs prevention and information. The UK has sought to identify areas for reform including the merger of several funding streams to create an Internal Security Fund thereby streamlining the application process, offering greater flexibility in its application and reducing the administration costs for the Commission. Negotiations for the next financial perspective 2014-2020 begin with the launch of a Commission White Paper in September.
52. COSI Funding: One of our priority interests in the field of internal security is ensuring that the Committee on Internal Security (COSI) has the funds to undertake new projects to deliver practical cooperation on the organised crime agenda. In order to muster support from Member States for these projects, it will be necessary to demonstrate some financial support from the EU. However, until there is a clearer picture of how many projects COSI will be likely to undertake and what action this will entail, we cannot offer costings on how much financial support will be necessary. It is envisaged that the Internal Security Fund will support the delivery of future COSI projects.
53. CIPS Funding: There is no justification for the Prevention, Preparedness and Consequence Management of Terrorism and other Security-related Risks Programme (CIPS) or an equivalent being a priority programme for the UK because there has been no evidence of value from a separate EU funding stream for critical infrastructure-related research and critical infrastructure protection remains a national competence, so the theoretical advantages of shared funding are proving difficult to achieve.

#### **IMPACT ASSESSMENT**

54. Not applicable to this Communication. The Communication is a non-legislative statement of policy in response to a request from the European Parliament. Where reference is made to measures that have been introduced in the UK then impact assessments have already been carried out, for example in respect of the consultation on the draft Code of Practice for the use of security scanners.

#### **FINANCIAL IMPLICATIONS**

55. There will be no direct financial implications for the UK as a result of this Communication. Where reference is made to measures that have already

been introduced in the UK then costs have been assessed, for example with regard to the CBRN action plan.

#### **CONSULTATION**

56. None outside Government as this Communication has no direct impact on wider bodies. Where reference is made to measures that have already been introduced in the UK then wider consultation has been carried out, for example in respect of consultations on designation orders for the port security authorities.

#### **TIMETABLE**

57. The Communication is likely to be discussed in the European Parliament in the LIBE Committee followed by a plenary session. The Council may also choose to discuss the Communication. There is currently no fixed timetable.

A handwritten signature in black ink, appearing to read 'Neville-Jones', with a long horizontal flourish underneath.

**THE RT HON BARONESS NEVILLE-JONES DCMG PC**  
**Home Office**