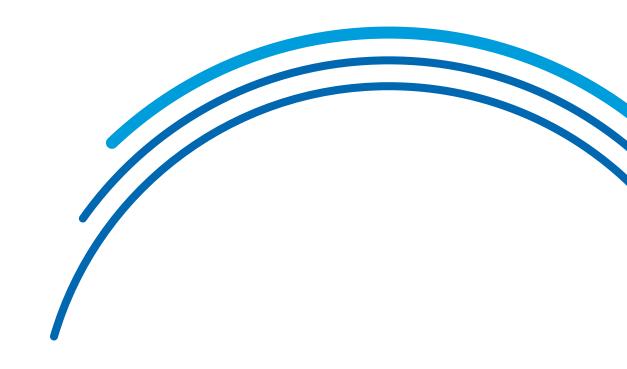


A Short-Notice Inspection of Birmingham Airport

November 2012



John Vine CBE QPM

Independent Chief Inspector of Borders and Immigration

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Foreword from John Vine CBE QPM Independent Chief Inspector of Borders and Immigration

Since my investigation into border security checks in February 2012, I have carried out follow-up inspections, looking at what action has been taken by Border Force to ensure that all appropriate security checks are undertaken. This inspection looked at this issue again, in addition to examining some of the customs activity undertaken by Border Force staff to see if the issues identified in my Heathrow Terminal 3 and Gatwick North inspections had been addressed.

At the time of my inspection of Birmingham Airport I found that all border security checks were being completed on passengers, in accordance with the Border Force Operating Mandate issued in July 2012. I was pleased with the customer service ethos, with staff dealing professionally and courteously with passengers at all times. I was particularly pleased that the complaints process was being promoted much more effectively. Good practice was also in place in relation to Border Force's safeguarding responsibilities in connection with children.

However, I was concerned to find that, in the months before the inspection, checks on the biometric chips within passports had not been carried out on 278 occasions. This was in contravention of the Border Force Operating Mandate. Equally concerning was that these breaches of the Operating Mandate only came to light through our inspection and were not identified through Border Force's internal management assurance mechanisms.

I was also disappointed to find that problems continue to exist in relation to the secondary control area, which deals with the interceptions of passengers suspected of customs offences. Here, I found that conflicting guidance was in place. It is important that Border Force ensures that a single source of clear guidance is available and that it is up-to-date and easily accessible, to make sure that staff act in a lawful, proportionate and controlled manner when carrying out these activities. It is also important that Border Force introduces more effective management assurance to ensure that poor practices or operational failures are identified and addressed quickly.

John Vine CBE QPM

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Independent Chief Inspector of Borders and Immigration

1. Executive Summary

- 1. This inspection followed up on the findings of our investigation into border security checks, looking at what action has been taken by Border Force to ensure that all appropriate security checks are undertaken. It also reviewed Border Force's progress in relation to some of the findings made during our previous inspections of Heathrow Terminal 3 and Gatwick North, in relation to the Secondary Control Point (SCP).¹
- 2. On 6 July 2012, Border Force published an Operating Mandate. This set out the checks which Border Force officers must conduct on arriving passengers. We found that staff were fully aware of the Operating Mandate and the border security checks they were required to carry out at the Primary Control Point (PCP).² Our observation of officers processing passengers confirmed that staff were carrying out all border security checks as required.

We found that staff were fully aware of the Operating Mandate and the border security checks they were required to carry out at the Primary Control Point (PCP)

- 3. Staff demonstrated excellent customer service when interacting with passengers at both the PCP and the SCP. They were professional and courteous, whilst at the same time ensuring that they asked relevant questions to ascertain whether to grant a passenger's entry to the UK or to carry out further investigations. Border Force was also promoting the complaints process more effectively, with information about how to complain readily available to passengers.
- 4. We found that staff were complying with the Border Force statutory duty to safeguard and promote the welfare of children and, whilst observing staff at the PCP, we identified positive examples of steps being taken to safeguard children.
- 5. Between January and September 2012, 278 passengers were processed through the PCP at Birmingham Airport at times when the biometric chip reading facility had been disabled. This was contrary to the Border Force Operating Mandate, which sets out that the biometric chip should always be opened to establish that the passenger is the rightful holder of the document. Senior managers considered that a significant factor contributing to this practice was that information about the function which allowed staff to stop opening the biometric chip did not form part of the training received by contingency staff prior to working at the PCP. However, we noted that approximately a third of these incidents were actioned by permanent Border Force staff.

This was contrary to the Border Force Operating Mandate, which sets out that the biometric chip should always be opened to establish that the passenger is the rightful holder of the document

6. We were advised that, in future, all contingency staff would be trained on the use of this function. In addition, all Border Force staff at Birmingham Airport were reminded that the facility to deactivate biometric chip opening should not be used without authorisation. These actions were important in

¹ The Secondary Control Point refers to the area where Border Force officials may be involved in the interception of passengers in relation to suspected customs offences. This can include the searching of persons or baggage.

² The Primary Control Point refers to the immigration border control point for passengers arriving on international flights.

order to ensure that Border Force maintains an effective immigration control. It also needs to ensure that it strengthens its management assurance processes so that such failures are identified and resolved quickly, rather than relying on the Inspectorate to identify breaches of the Operating Mandate.

- 7. However, the risk to the border when these biometric checks were suspended needs to be kept in perspective. We found that the Warnings Index (WI) check, which indicates whether a passenger has previously committed a terrorist, criminal or immigration offence or is of interest to law enforcement agencies, was carried out consistently at Birmingham Airport. We also note the positive action that Border Force took after our inspection to prevent further accidental deactivations of the chip-opening function.
- 8. During our earlier inspection of Gatwick North and Heathrow Terminal 3, we reported concerns regarding officers' use of selection indicators when deciding which passengers to challenge at the SCP. During this inspection, we found that officers demonstrated a good awareness of the visual indicators and legislation that could prompt a passenger to be intercepted at the SCP.
- 9. However, we found that contradictory and out-of-date guidance was in place in relation to two separate issues governing the work of staff at the SCP. The first concerned conflicting guidance provided to staff, in relation to the actions they should take when intercepting passengers as they passed through the SCP. The HMRC Enforcement Handbook³ instructed staff to make a notebook entry whenever such interceptions of passengers took place, whereas a subsequent Border Force Interim Operational Instruction stated that notebook entries should not be made in relation to negative interceptions when no illicit goods were found.

We found that contradictory and outof-date guidance was in place in relation to two separate issues governing the work of staff at the SCP

- 10. We noted that this instruction was due to be reviewed at the end of 2011. This review never took place. We also found that staff were failing to comply with this instruction in its entirety. This latter issue was compounded by ineffective management assurance processes which had failed to identify these problems. While we understand that there will, at times, be a need to publish Interim Operational Instructions whilst formal guidance is updated (for example, to deal with an emerging issue that needs to be addressed immediately), we remain concerned that, at the time of our inspection, some 20 months after the instruction was first issued, the overarching HMRC Enforcement Handbook had still not been updated to reflect this change.
- 11. The second issue concerned covert baggage examinations. Again, we found conflicting guidance, some of which was out of date. We found that the Border Force Enforcement Handbook⁴ generally prohibited this activity, whereas a HMRC consultation paper and draft Code of Practice, issued in July 2008, allowed this activity to take place as long as certain conditions were met. However, at the time of our inspection, over four years later, this guidance had still not been reflected in the overarching Border Force Enforcement Handbook.
- 12. Management assurance processes were not in place to govern this work and central record-keeping about the use of powers to conduct covert baggage searches was incomplete. Border Force needs to do more to ensure that its guidance is clear, consistent, up to date, easily accessible and contained in one place. This is particularly important to ensure that staff act in a lawful, proportionate and controlled manner when carrying out covert baggage searches.

Border Force needs to do more to ensure that its guidance is clear, consistent, up to date, easily accessible and contained in one place

³ The HMRC Enforcement Handbook was created when HMRC controlled all Customs activity at the border. While much of this work is now under the control of Border Force, this handbook still contains the guidance for practices that are common to both HMRC and Border Force, and is accessible (web-based) to Border Force staff.

⁴ The Border Force Enforcement Handbook is constructed from the former HMRC guidance that is now only applicable to Border Force activity, i.e. that which is no longer undertaken by HMRC.

2. Summary of Recommendations

We recommend that Border Force:

- 1. Ensures that there is a single source of operational guidance, that it is maintained and kept up-to-date, incorporating any changes made by Interim Operational Instructions quickly and effectively.
- 2. Ensures that managers undertake regular and effective audit and assurance activity to make sure that staff are complying with policy, guidance and legislation that cover their work activities.

3. The Inspection

Role and remit of the Independent Chief Inspector of Borders and Immigration

- 3.1 The UK Border Agency ('the Agency') was formed in 2008 with the amalgamation of the Border and Immigration Agency, UK Visas and border operations from Her Majesty's Revenue and Customs (HMRC). Over 4,000 staff were transferred permanently from HMRC on 5 August 2009, constituting a single Border Force within the Agency, designed to 'create a multi-skilled integrated workforce to improve security at the border, facilitate legitimate travel and trade and provide increased flexibility to tackle areas of greatest risk and pressures.'
- 3.2 The role of the Independent Chief Inspector ('the Chief Inspector') of the UK Border Agency was established by the UK Borders Act 2007 to examine and report on the efficiency and effectiveness of the Agency. In 2009, the Chief Inspector's remit was extended to include customs functions and contractors.
- 3.3 On 20 February 2012, the Home Secretary announced that Border Force would split from the Agency as of 1 March 2012, to become a separate operational command under a Director General (DG) within the Home Office. The Home Secretary confirmed this change would not affect the Chief Inspector's statutory responsibilities and that he would continue to be responsible for inspecting the operations of both the Agency and the new Border Force.
- 3.4 On 22 March 2012, the Chief Inspector of the UK Border Agency's title changed to become the Independent Chief Inspector of Borders and Immigration. His statutory responsibilities remain the same. The Chief Inspector is independent of the UK Border Agency and Border Force, and reports directly to the Home Secretary.

Background

3.5 Birmingham Airport is the UK's seventh busiest airport and the third busiest outside London, processing over 8.5 million passengers and just under 84,000 flights in 2011. The airport has two terminals and sits within the Border Force Central Region. Figure 1 provides a breakdown of Border Force staff by grade and team in operation at the time of our inspection.

⁵ Annual UK airport statistics from the Civil Aviation Authority.

Figure 1: Staff breakdown by grade and team					
Grade/Team	PCP/ Secondary*	Mobile/ Cyclamen	Freight	Cash/ Dogs	Total
Admin Assistant (AA)	0	0	0	1	1
Admin Officer (AO)	2	3	2	6	13
Assistant Immigration Officer (AIO)	3	0	0	1	4
Immigration Officer/Officer(IO/O)	37	7	8	5	57**
Chief Immigration Officer/Higher Officer (CIO/HO)	3	1	1	0	5
Her Majesty's Inspector (HMI)	3***	0	0	0	3
Assistant Director (G7)	1	0	0	0	1
Total	49	11	11	13	84

^{*}Cumulative number of staff across three teams with shifts starting at either 07:00 or 14:00.

Purpose

- 3.6 As part of our inspection plan for 2011/12, we carried out an inspection of Heathrow Airport Terminal 3, where we identified a number of inconsistencies in the way border security checks were being operated. These concerns were brought to the attention of the Chief Executive of the Agency. The Home Secretary subsequently requested that the Chief Inspector investigate and report to her on this matter.
- 3.7 Our investigation report into border security checks⁶ at 17 UK ports, including Birmingham Airport, was published on Monday 20 February 2012. It found that WI security checks had been suspended at Birmingham Airport on seven occasions in 2011. Discrepancies were also identified between local and central records regarding these occurrences.
- 3.8 In addition, our inspection findings at Gatwick North and Heathrow Terminal 3⁷ reported our concerns about the way in which Border Force officers were determining which passengers to challenge at the SCP.
- 3.9 This short-notice inspection therefore assessed whether relevant border security checks were being undertaken at Birmingham Airport. It also included an examination of some the processes employed by staff working at the SCP. This inspection sought to establish whether Border Force's:
 - staff were complying with the Border Force Operating Mandate relating to border security checks;
 - queue measurement process had been improved so that it accurately reflected queuing times and passenger experiences at the PCP;
 - staff in the secondary detection area demonstrated a good understanding of appropriate selection

^{**}Includes staff previously referred to as customs officers.

^{***}One currently on temporary promotion to HMI.

⁶ http://icinspector.independent.gov.uk/wp-content/uploads/2012/02/2012-02-20-Report-of-the-UKBA-ICI-Report3.pdf

⁷ These reports can be found here: http://icinspector.independent.gov.uk/wp-content/uploads/2012/02/Inspection-of-Border-Control-Operations-at-Terminal-3-Heathrow-Airport1.pdf

http://icinspector.independent.gov.uk/wp-content/uploads/2012/02/Inspection-of-Gatwick-Airport-North-Terminal.pdf

- indicators when determining which passengers to challenge; and
- complaints process was being effectively promoted.
- 3.10 We also reviewed progress against the recommendations set out in our border security checks investigation report.

Methodology

- 3.11 The inspection methodology was developed using the Chief Inspector's Inspection criteria⁸ (listed in Appendix 1), under the key themes of Operational Delivery, Safeguarding Individuals and Continuous Improvement.
- 3.12 The on-site phase of the inspection took place over two days (7-8 November 2012). It covered both peak morning and evening periods. Two weeks before the on-site phase, we informed Border Force of our intention to conduct the inspection, primarily to facilitate the collection of performance information. Inspection activity used to measure performance against the criteria included:
 - interviews and focus groups with staff, team leaders and senior managers involved in immigration and customs operations;
 - observation at the PCP and SCP at different times of the day (between 7.30am and 7.30pm);
 - observation of one detailed passenger case interview; and
 - review of management and performance information.
- 3.13 Figure 2 provides a breakdown of staff interviewed by grade.

Figure 2: Border Force staff interviewed		
Grade	Number of staff	
Administrative Officer	2	
Assistant Immigration Officer	1	
Immigration Officer/Officer	10	
Chief Immigration Officer/Higher Officer)	6	
Her Majesty's Inspector/Senior Officer	2	
Assistant Director/Grade 7	1	
Director/Grade 6	2	
Director/Grade 5	1	
Total	25	

3.14 The inspection identified two recommendations, which are provided on Page 5 of this report.

⁸ All criteria of the Independent Chief Inspector of the UK Border Agency can be found at http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Inspection-Criteria.pdf

⁹ These interviews are a fundamental part of the decision-making process in determining whether to grant or refuse entry to the UK for the passengers concerned.

4. Inspection Findings - Operational Delivery

Decisions on the entry, stay and removal of people should be taken in accordance with the law and the principles of good administration

4.1 The inspection assessed the efficiency and effectiveness of Border Force operations at Birmingham Airport, with a particular focus on border security checks at the PCP and the use of selection indicators when determining which passengers to challenge at the SCP.

Border security checks at the Primary Control Point

4.2 In response to the recommendations made in our border security checks report, Border Force published an Operating Mandate for staff on 6 July 2012. This set out the border security checks that officers must conduct at the both the PCP and the SCP. We found that staff were clear about their responsibilities under the Operating Mandate. During our interviews and focus groups with staff and managers, we found that they were aware that border security checks at the PCP should not be suspended without the prior approval of the DG of Border Force.

We found that staff were clear about their responsibilities under the Operating Mandate

- 4.3 We observed staff working at the PCP at Birmingham Airport's main terminal (Terminal 1) for a total of 13 hours. In total, we observed 26 officers¹⁰ processing 450 passengers. All the officers we observed conducted security checks when processing passengers at the PCP, in accordance with the Operating Mandate. This included using:
 - Warning Index (WI) checks¹¹ in all cases, including opening the biometric chip (photograph) within all travel documents; and
 - Secure ID checks¹² in all relevant cases.
- 4.4 Our interviews with staff and managers confirmed that Border Force staff at the PCP continued to perform all border security checks during busy peak periods. There was no instruction or expectation that staff should suspend checks in order to process passengers more quickly during busy periods.
- 4.5 We were told that, since 4 November 2011, Secure ID checks had been suspended on three occasions. On two of these occasions, WI was also suspended. Figure 3 provides details of these suspensions.

¹⁰ Some Border Force staff may have been observed more than once by different Inspectors.

¹¹ Used to ascertain whether passengers are of interest to the UK Border Agency, the police, or other government departments.

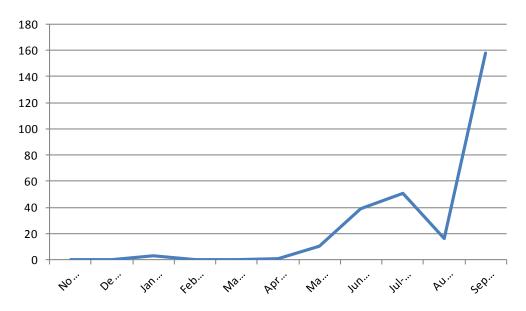
¹² Checks passengers' fingerprints at the immigration controls and verifies them against those previously provided during the visa application process.

Figure 3: Secure ID and/or Warnings Index suspensions			
Date	Reason for suspension	Outcome	
25 January 2012	National outage of the Secure ID system.	In accordance with the contingency measure set out in the Border Force Operating Mandate, checks were carried out using the Case Reference System (CRS), a web-based application that contains entry clearance data (visa information) from diplomatic missions overseas.	
28 March 2012	Power outage caused by a short circuit following routine maintenance at Birmingham Airport. WI was also suspended on this occasion.	The Operating Mandate was not followed and DG approval was not sought. A member of staff was subsequently subject to disciplinary action. We were told that a full report of the incident was submitted to the DG's office.	
29 March 2012	Power outage caused by a short circuit following routine maintenance at Birmingham Airport. WI was also suspended on this occasion.	The Operating Mandate was followed and DG approval was sought and given to suspend checks. A report was sent to the Home Secretary in relation to this incident.	

Biometric chip reading facility

- 4.6 Officers at the PCP are required to open the biometric chip within European Economic Area (EEA) passports. This allows them to compare a passenger's passport photo with the photo embedded in the biometric chip. At the time of our investigation into Border Security checks we found that between January and June 2011 (inclusive), the biometric chip reading facility had been deactivated at a number of ports on 14,812 occasions.
- 4.7 During this inspection, we found that between 4 November 2011 and 30 September 2012, this facility had been disabled at Birmingham Airport on 11 separate occasions. As a result, 278 passengers had not had the biometric chip opened in their passports. Figure 4 provides a monthly breakdown of this.

Figure 4: Number of passengers processed when the biometric chip reading facility had been deactivated



Note: Management information provided by Border Force.

4.8 We asked senior managers why there had been a significant increase in these deactivations between May and September 2012. Although unable to initially explain why these deactivations had occurred, they subsequently established that the majority (at least 68%) were carried out by contingency staff, brought in to help manage the PCP during the London 2012 Olympic Games period. They considered the most likely factor that contributed to this error was that the function which enabled staff to stop opening the biometric chip did not form part of the training that contingency staff had received prior to working at the PCP.

They considered the most likely factor that contributed to this error was that the function which enabled staff to stop opening the biometric chip did not form part of the training that contingency staff had received prior to working at the PCP

- 4.9 We were advised that, in future, all contingency staff would be briefed on the function and rules governing the use of this function. We were also told that senior managers had written to all staff at Birmingham to prevent this happening again. Border Force Officers¹³ responsible for approximately a third of these deactivations had also been spoken to individually and reminded that this facility should not be used for any reason without prior authorisation. We consider this important for ensuring that Border Force maintains an effective border control.
- 4.10 The action taken by senior managers at Birmingham to stop any further deactivations of the biometric chip reading facility was positive. However, we remain concerned that this problem was highlighted by our inspection, rather than by any formal management assurance activity. This was disappointing, in view of our border security checks report, in addition to Border Force's own Operating Mandate, which sets out that this is a mandatory check. We have frequently reported about the need for effective management oversight to provide assurance to senior managers and Ministers that staff are operating in accordance with policy and guidance. We therefore make the following recommendation.

However, we remain concerned that this problem was highlighted by our inspection, rather than by any formal management assurance activity

We recommend that Border Force:

- ensures that managers undertake regular and effective audit and assurance activity to make sure that staff are complying with policy, guidance and legislation that cover their work activities.
- 4.11 Following our inspection, we were informed that Border Force had taken action¹⁴ to update all WI terminals to prevent the accidental deactivation of the chip-opening function. We therefore make no further recommendation on this issue.

Targeted checks of EEA children travelling in family groups

4.12 Birmingham Airport was participating in a three-month pilot scheme which meant that selected officers did not have to routinely carry out WI checks or open the biometric chips contained in the passports of EEA national children travelling in clear family groups. ¹⁵ The suspension of these checks was carried out on a randomised basis, with 10% of EEA national children travelling in family groups still being subject to full checks. At the time of our inspection, Birmingham Airport had been participating in the pilot scheme for three weeks. We were provided with evidence that the pilot scheme had been authorised by Ministers. We reviewed the guidance provided to staff, and found that it clearly set out the scope of the pilot scheme. Officers selected to participate in the pilot scheme were also confident that they understood their responsibilities.

Overall decision-making at the Primary Control Point

- 4.13 We found that staff at the PCP were effective and professional when carrying out their work. Similar to the findings made during our short-notice inspection of Heathrow Terminals 3 and 4, we found that effective questioning was used by Border Force staff. For example, non-EEA passengers were asked questions about the reason for their visit to the UK. We also observed good interaction between officers at the PCP and those at the SCP (for example, through sharing information or intelligence).
- 4.14 Chief Immigration Officers told us they spent between 75% and 90% of their time observing officers at the PCP. They told us that this enabled them to ensure that checks were being carried out in accordance with the Operating Mandate. We observed this in practice whilst we were on site.

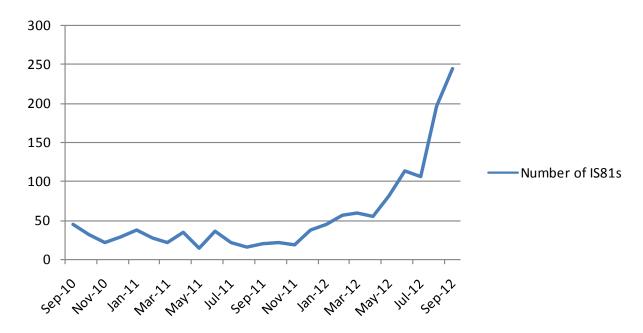
We found that staff at the PCP were effective and professional when carrying out their work

4.15 We noted there had been a significant increase in the numbers of IS81 forms issued to passengers at the PCP between September 2010 and September 2012. This is a Border Force form which is issued to passengers if staff wish to conduct further examinations of passengers at the immigration control. Figure 5 illustrates this.

^{14 2} December 2012.

¹⁵ Accompanied by one or both parents or legal guardians.

Figure 5: Number of IS81 forms issued



Note: Management information provided by Border Force.

4.16 We discussed this with senior managers, who told us that this increase had occurred because, previously, officers had not always been issuing IS81 forms to passengers when they should have done. An example of this was when a passenger was asked to wait whilst a more detailed WI check was carried out in the watchhouse. 16 Officers had subsequently been instructed that an IS81 form must be issued when a passenger is stopped at the PCP, to facilitate further checks being undertaken away from the control point. This had resulted in an increase in the number of IS81 forms being issued.

This was a good example of Border Force working to ensure compliance with its policy, in order to ensure the integrity of the UK border

4.17 This was a good example of Border Force working to ensure compliance with its policy, in order to ensure the integrity of the UK border. However, whilst observing officers at the PCP, we noted that, on three occasions, passengers were not issued with an IS81 form whilst an officer made initial further enquiries. We therefore consider that more work needs to be done to ensure that officers comply with Border Force policy and issue these forms to passengers whenever further enquiries are being made.

Queue management and measurement

- 4.18 As we have previously reported, UK ports are assessed on queuing performance against the following national targets set by Border Force:
 - 95% of EEA passengers are cleared within 25 minutes; and
 - 95% of non-EEA passengers are cleared within 45 minutes.

¹⁶ A dedicated room which provides an overall view of the Primary Control Point and contains relevant IT equipment, including Home Office databases, CCTV monitors to assess the volume of arriving passengers and Civil Aviation Authority (CAA) systems which show the status of flight arrivals and the number of passengers on board.

¹⁷ One of these passengers was eventually issued with an IS81

- 4.19 Whilst we were on site, we found there were no notices informing passengers of these national targets, nor were there any notices advising passengers how long they could expect to wait once they were in a queue. Keeping passengers informed in this way would have demonstrated a better standard of customer service. We discussed this with senior managers, who informed us they would need to seek agreement from Birmingham Airport officials before displaying these notices.
- 4.20 We did not observe any queue measurement processes in operation during the on-site phase of the inspection but we were told that, in order to measure queue performance, Border Force staff at Birmingham Airport used a similar process to that used by Border Force staff in other airports. Figure 6 illustrates this process.

Figure 6: Queue measurement process

- Two cards are noted with the current time. They are then given respectively to passengers at the end of the EEA and non-EEA queue.
- On their arrival at the immigration desk, each passenger hands the card to the immigration officer.
- The immigration officer at the desk notes on the card the time that they received it.
- 4 The card is handed to a Chief Immigration Officer who collates the information.
- 4.21 When passenger queues exceeded the national queuing time targets, this was referred to as a 'breach'. We reviewed statistics relating to queue breaches from 29 September 2012 to 9 November 2012. In total, we found there were five queue breaches in this six week period. These breaches predominantly occurred because flights landed earlier or later than scheduled, which led to an unexpected increase in passenger numbers.
- 4.22 In our earlier inspections of other ports, ¹⁸ we reported that we considered the method of queue measurement set out in Figure 6 to be basic and that it did not always provide a true reflection of the volume of passengers in the hall during the hourly period. Whilst observing officers at the PCP, on one occasion we observed a non-EEA queuing time of one hour and 18 minutes. This queue breach was not reported to us in the statistics provided by Border Force. We therefore consider further work is still required to address this issue, to ensure that a robust mechanism for collecting accurate performance information in relation to queues is implemented.

We therefore consider further work is still required to address this issue, to ensure that a robust mechanism for collecting accurate performance information in relation to queues is implemented

Passenger interviews

- 4.23 Formal passenger interviews are conducted by Border Force staff to help inform the decision to grant or refuse entry to the UK. They are an important tool in cases where queries cannot readily be resolved with simple checks, and where passengers need to provide further information to satisfy Border Force staff about their intentions. Formal interviews allow Border Force staff to investigate and assess the intentions of passengers wishing to enter the UK while, at the same time, providing passengers with an opportunity to:
 - explain their circumstances more fully;
 - address inconsistencies raised by questioning of sponsors/travelling companions; and
 - respond to any queries about items found in their possession.

¹⁸ Inspections of Heathrow Terminal 3, Gatwick North and the short-notice inspection of Heathrow Terminals 3 and 4. http://icinspector.independent.gov.uk/

4.24 We observed one formal interview during this inspection. We foundthat the officer conducting the interview did so in a calm, professional and courteous manner. In this case, we were satisfied that the interview was conducted in accordance with Border Force guidance.

Record-keeping - Primary Control Point

- 4.25 At the time of our investigation into border security checks, we found that the Agency's records relating to the suspension of Secure ID and the WI were poor and we recommended that record-keeping at ports should be overhauled to ensure that staff knew what to record and why, whilst keeping bureaucracy to a minimum. Management should ask for, and review, records of border security checks to inform development of policy.
- 4.26 At the time of this inspection, we did not identify any issues with record-keeping in relation to the suspension of checks.
- 4.27 We found that a number of records were maintained at the PCP. This included:
 - when an IS81 form was issued; and
 - whenever there was a WI hit.
- 4.28 We reviewed these records in relation to 7 November 2012, and found that an inconsistent approach had been adopted regarding the completion of some of these records. There were ten entries in the WI log; however, eight of these were not recorded in the IS81 log on the same day. Following our inspection, Border Force told us that, in some cases where a WI hit was identified, further enquiries would not have been required: therefore these passengers would not have been issued with an IS81 form. However, they acknowledged that, in at least one of these cases, an entry should have been made in the IS81 log. Although it was positive to see that these records were being kept, it is important that the completion of these logs is monitored effectively to ensure their accuracy and reliability.
- 4.29 We therefore believe Border Force still has some way to go to ensure that it is fully implementing the recommendations that we made in our border security checks report in relation to record-keeping and management assurance.

Customs and immigration offences should be prevented, detected, investigated and, where appropriate, prosecuted

Guidance

4.30 Border Force staff dealing with potential customs offences access different sets of guidance, depending on the activity they are undertaking. The HMRC Enforcement Handbook contains guidance that was created when HMRC staff were responsible for detecting customs offences at the border. Border Force staff access this guidance for activities that remain common to both organisations, e.g. access to interview suites and standards of note-keeping.

- 4.31 The guidance relating to former HMRC activities, now undertaken solely by Border Force (e.g. use of drug detector dogs and search of vessels) has been migrated into the Border Force Enforcement Handbook.
- 4.32 Additionally, Border Force has created the Border Force Operations Manual, which will eventually become the location where all Border Force guidance is held, once it is migrated from the two current Enforcement Handbooks. At present, the Border Force Operations Manual contains only limited guidance relating to customs offences.
- 4.33 Border Force also use Interim Operational Instructions (IOI), which are issued when guidance or instructions change at short notice. These state they should be reviewed six months after their issue and, if this period has elapsed, the author of the IOI is to be contacted to check whether it remains valid.

Selection indicators

4.34 During our earlier inspection of Gatwick North and Heathrow Terminal 3, we reported concerns regarding officers' use of selection indicators when deciding which passengers to challenge at the SCP. During our inspection of Birmingham Airport, we observed officers at the SCP and found that they demonstrated a good awareness of the visual indicators and legislation that could prompt a passenger to be intercepted.

Record-keeping - Secondary Control Point

- 4.35 Officers working at the SCP were required to record certain information in their notebooks. In addition to notebook records, a central Search of Person record was maintained in the SCP office. We observed three officers recording entries in their notebooks and found that they included a good level of detail, setting out why baggage searches were undertaken. However, limited quality assurance of these notebook records was carried out by managers. We also found that the notes in the Search of Person record were never compared with the entries in officers' notebooks. We considered that this would have helped Border Force to ensure the accuracy and consistency of these records.
- 4.36 Staff at all grades working at the SCP told us that guidance only required them to make notebook entries in the following circumstances:
 - when they detect a prohibited or restricted article;
 - when they intercept a passenger for a potentially sensitive reason, for example, because of intelligence received; and
 - in order to protect staff and the organisation, for example, when the officer considers that a complaint may be made by a passenger.
- 4.37 At the time of the inspection, we reviewed the HMRC Enforcement Handbook. This stated that officers should make notebook entries whenever a passenger is intercepted, regardless of the outcome of the interception. Our observations and discussions with staff revealed that they had not been following this guidance.
- 4.38 We raised this with managers during the inspection. They told us that an Interim Operational Instruction had been issued to staff on 19 April 2011, stating that negative interceptions¹⁹ did not need to be recorded in notebooks. This instruction was due to be reviewed at the end of October 2011; however, we found this review had not been carried out. We looked at this instruction and found that, despite its long-overdue review, staff were still relying upon it to guide their activity, even though it contradicted the guidance in the HMRC Enforcement Handbook.

¹⁹ A 'negative' interception is one where no further actions are warranted after the passenger has been intercepted, and they are allowed to proceed without any further control action (e.g., goods have not been seized and no arrest has been made).

We were further concerned to find that, while staff claimed to be following the operational instruction issued on 19 April 2011, some requirements within it were not being observed. For example, the guidance listed the requirement to make a notebook entry if passengers were delayed for longer than they would reasonably expect, such as whilst officers carried out a more detailed examination of baggage. Whilst observing officers at the SCP, passenger baggage was seen to undergo detailed examination. This included searching baggage and x-raying the empty suitcases on a number of occasions. These examinations were not routinely recorded in notebooks by staff.

- 4.39 Managers told us that some assurance on the use, completion and content of notebooks by SCP staff was undertaken, although this was not carried out routinely. However, even if routine assurance had been undertaken, managers would have been unable to satisfy themselves that procedures were being correctly followed, due to the existence of contradictory guidance.
- 4.40 We reported this to senior managers, who acknowledged our findings. On 19 November 2012 they issued a note to staff in the region clarifying the policy.

However, even if routine assurance had been undertaken, managers would have been unable to satisfy themselves that procedures were being correctly followed, due to the existence of contradictory guidance

Covert baggage examinations

- 4.41 SCP staff were sometimes required to search passenger baggage without the passenger being in attendance, for example where strong suspicion or intelligence indicated that bags might contain prohibited or restricted items.
- 4.42 Information provided by Border Force indicated that 1,147 seizures were made as a result of covert baggage searches at Birmingham Airport between October 2011 and September 2012. The relatively large number of seizures made using this technique provided some evidence that this search power was being used effectively. However, there was no central record to show occasions where covert baggage searches were carried out, but no seizures were made. The absence of these records meant that no assurance could be provided to demonstrate that this power was being used in a lawful, proportionate and controlled manner.
- 4.43 Managers also stated that there had been an absence of any assurance being undertaken to ensure that the correct procedures were being followed to protect Human Rights obligations during these searches. Following our inspection, they issued an instruction to all staff to ensure that all covert baggage searches were recorded and that related notebook entries must be presented to either the Chief Immigration Officer or Higher Officer for scrutiny and approval at the end of each shift. We therefore repeat our earlier recommendation on page 14 about the importance of effective assurance mechanisms being put in place.
- 4.44 During this inspection, we examined a number of pieces of legislation and guidance relating to covert baggage searches. Figure 7 provides details of this guidance.

Figure 7: Covert baggage examination legislation and guidance		
Legislation and Guidance	Description	
1) S.159 of the Customs and Excise Management Act 1979 (CEMA).	Permitted covert baggage searches until 2007, when a legal challenge to the use of this power led to the suspension of covert baggage searches.	
2) Finance Act 2008.	Amended S.159 of CEMA to once again permit staff to open baggage, even if passengers were not in attendance.	
3) HMRC consultation paper 2008, ²⁰ and draft Code of Practice on customs examination of baggage in the absence of the passenger.	Stated that the power to carry out covert baggage searches must be used proportionately, and only when necessary to protect the UK from smuggling. The majority of searches would therefore need to form part of pre-planned activity based on a risk assessment.	
4) Current Border Force Enforcement Handbook guidance.	Lists the prohibition in the use of S.159 of CEMA for covert baggage examination and states that, where baggage examination is required without the passenger in attendance, this can only be done if a Directed Surveillance authority ²¹ is in place. This guidance contains derogations from this procedure only in extenuating circumstances, for example, if officers are required to search unattended baggage.	

- 4.45 Despite the fact that the current Border Force Enforcement Handbook guidance prohibited this activity, staff confirmed they were carrying out covert baggage searches. Senior managers told us that outbound intervention activity was carried out in accordance with the 2008 HMRC consultation paper and the draft Code of Practice. However, they were unable to provide any such assurance for inbound intervention activity, primarily because there were no assurance mechanisms in place to monitor whether staff were complying with this guidance. We also noted that:
 - the HMRC document was headed as a consultation document;
 - the Code of Practice attached to it was referred to as a draft;
 - the audience it was aimed at did not include staff;
 - it was not reflected in either the HMRC or Border Force Enforcement Handbooks; and
 - the HMRC document was only valid until September 2008.
- 4.46 Following the on-site phase of our inspection, managers told us that the web-based Border Force Enforcement Handbook had been updated to reflect the HMRC consultation paper. They added that senior managers at Birmingham Airport had also disseminated this instruction to all staff. While Border Force provided us with a 'screenshot' of the updated index, showing that guidance was in place, our access to the web-based Border Force Enforcement Handbook established it had not been updated to include this guidance.
- 4.47 We were subsequently told that the updated 'screenshot' had been forwarded to HMRC in order that they update the web-based Border Force Enforcement Handbook guidance, but this had yet to take place.²² However, senior managers reassured us that all officers were able to access the guidance through the HMRC IT system called STRIDE, the system previously used by HMRC customs officers. It was acknowledged that, although all Border Force staff could access this system, it was

²⁰ Joint Customs Consultative Committee (JCC) consultation paper 009. Customs examination of baggage in the absence of the passenger. 21 Surveillance that is covert but not intrusive and is undertaken for the purposes of a specific investigation or a specific operation; in such a manner as is likely to result in the obtaining of private information about a person. Such surveillance requires a written application in advance and advance authority from a member of staff of at least Senior Executive Officer level, is subject to a Code of Practice, and is scrutinised by the Office of the Surveillance Commissioners.

²² HMRC owns the policy and guidance relating to enforcement activity in the Secondary Control Point. They are therefore responsible for making changes to the web-based guidance set out in the Border Force Enforcement Handbook.

likely that former Immigration Officers would rely more heavily on the Border Force Enforcement Handbook accessible through POISE, a Home Office IT system. This meant that some staff would be unaware of the HMRC consultation paper and draft Code of Practice on covert bag searches.

4.48 In conclusion, we found that the guidance available on this important issue was contradictory and out of date. This meant that, depending on the guidance accessed, staff would follow different procedures when carrying out covert baggage searches. A lack of management assurance compounded this issue and meant managers could not be certain that the correct procedures were being followed. It is important for Border Force to ensure these issues are addressed, in order to satisfy itself that necessary safeguards are employed effectively to ensure that officers act in a lawful, proportionate and controlled manner when carrying out covert baggage searches.

A lack of management assurance compounded this issue and meant managers could not be certain that the correct procedures were being followed

4.49 In view of our inspection findings, we make the following recommendation for Border Force staff carrying out customs activities.

We recommend that Border Force:

ensures that there is a single source of operational guidance, that it is maintained and kept
up-to-date, incorporating any changes made by Interim Operational Instructions quickly and
effectively.

Complaints procedures should be in accordance with the recognised principles of complaints handling

4.50 At the time of our earlier inspections of Manchester Airport, Gatwick North and Heathrow Terminal 3, we found that information and documentation about how to complain was only available to passengers in a limited fashion. During this inspection, we found that the position had improved, with:

Overall, we were satisfied that passengers had sufficient opportunity to complain and we considered that Border Force was effectively promoting the complaints process

- up-to-date posters in the arrivals hall explaining how to complain; and
- complaints leaflets on desks at the PCP.
- 4.51 However, at the SCP, we found that complaints leaflets were sometimes kept in locations which were inaccessible to passengers, for example behind baggage benches or on shelving partially obscured from passengers' field of vision when walking through the control. We reported this to senior managers, who informed us they would arrange to have these moved to a more accessible location.
- 4.52 Overall, we were satisfied that passengers had sufficient opportunity to complain and we considered that Border Force was effectively promoting the complaints process.

5. Inspection Findings – Safeguarding Individuals

All people should be treated with respect and without discrimination except where the law permits difference of treatment

5.1 Our observations revealed that Border Force staff at Birmingham Airport treated passengers fairly and with respect. We observed Border Force staff using different languages or amending speech patterns (for example by slowing their speech down) to communicate with passengers both at the PCP and the SCP, and during the formal interview we observed. Staff also demonstrated good awareness of what resources were available to them if language difficulties prevented good communication with a passenger. This included asking other colleagues with language skills and using a telephone system that enabled them to access interpreters of all languages, 24 hours a day.

Functions should be carried out having regard to the need to safeguard and promote the welfare of children

- 5.2 Section 55 of the Borders, Citizenship and Immigration Act 2009 sets out the requirement for the Secretary of State to make arrangements to ensure that immigration, asylum, nationality and customs functions are exercised having regard to the need to safeguard and promote the welfare of children in the United Kingdom.
- 5.3 During our interviews and focus groups, staff demonstrated a good awareness of their responsibilities under Section 55 of the Borders, Citizenship and Immigration Act 2009. Our observations also confirmed that staff at the PCP were aware of the need to safeguard children and of the processes to be followed. Examples of this included:
 - locating and speaking to a child's schoolteacher, to ensure that they were travelling as part of a school group as claimed; and
 - requesting a parental letter of authority²³ for a child who was travelling with their aunt and uncle.
- 5.4 Overall, we were satisfied that Border Force officers were meeting their obligations under Section 55 of the Borders, Citizenship and Immigration Act 2009.

²³ A letter from the child's parents confirming they were happy for their child to travel without them.

Personal data should be treated and stored securely in accordance with the relevant legislation and regulations

5.5 In addition to Terminals 1 and 2, Birmingham Airport had a stand-alone General Aviation (GA)²⁴ terminal that handled flights from EU and non-EU destinations. We visited the GA office and found that historic General Aviation Reports were stored on the top of an open desk rather than being filed more securely. We noted that some of these reports dated back to March 2012. It is important for Border Force to review their storage procedures for these documents, to ensure adherence to the organisation's 'clear desk' policy.

²⁴ General Aviation refers to aircraft movements, both domestic and international, that do not operate to a specific and published schedule.

6. Inspection Findings – Continuous Improvement

The implementation of policies should be continuously monitored and evaluated to assess the impact on service users and associated costs

Progress against recommendations

6.1 Following the publication of our report into border security checks, Border Force accepted all 12 recommendations that we made. We therefore used the opportunity of this short-notice inspection to assess the progress that Border Force had made against these recommendations. Our findings are shown in Figure 8.

Figure 8: Summary of progress against recommendations			
Recommendation	Actions		
The extent of the Agency's operational autonomy from the Home Office needs to be explicit, with a clear delineation of roles and responsibilities.	On 1 March 2012, Border Force split from the UK Border Agency to become a separate operational command within the Home Office.		
A new framework of border security checks, authorised by Ministers, should be produced and implemented urgently. This needs to take account of the different operational environments at ports, the benefits to border security of conducting the checks and the implications for border security of any reduction in checks.	 On 6 July 2012 Border Force produced an Operating Mandate. This document: provided officers with guidance and instructions relating to the work of Border Force; defined 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; described known circumstances of variance where mandatory checks cannot be conducted, setting out the alternative processes that must apply in these circumstances; and set out the limited circumstances in which the suspension of full checks is acceptable, and reporting processes which must be followed whenever this happened. 		
Ministers should decide the minimum standard of border security checks to be applied at UK ports before allowing entry to the UK.	As above. All staff we spoke to were aware that all border security checks should be undertaken. Managers also told us that all staff had signed the instruction to confirm they understood the requirement for full checks to be carried out.		

Ministerial decisions, policy The Border Force Operating Mandate clearly stipulated which proposals and operational checks officers were required to carry out on passengers at the instructions must be PCP. communicated effectively with specific and careful use of We found that all officers were aware of their responsibilities under the Border Force Operating Mandate. language. During the on-site phase of the inspection we observed a briefing session for officers at the start of their shift, and found that they were all reminded about the Operating Mandate. The level of authorisation The lines of escalation for authorisation for the suspension of required for any suspension of checks were clear. or reduction in border security checks must be set out explicitly All staff were clear there should be no suspensions of, or and authorised by Ministers. derogation from, full checks without the prior approval of the Director General of Border Force or his deputy, through the Duty Director. This was clearly set out in the Operating Mandate. Suspension of border security Since 4 November 2011, Secure ID checks had been suspended on three occasions. On two of these occasions checks should only take place when absolutely necessary. WI was also suspended. Figure 2 provides details of these Records showing the frequency suspensions. of these, the reasons for them and the level of authorisation The WI outages were caused by a short-circuit following obtained should be reported to routine maintenance at Birmingham Airport. A new protocol Ministers and senior managers between the airport and Border Force was subsequently agreed, on a quarterly or more frequent to prevent this from happening again. basis. All staff were clear that checks should be carried out in To ensure that suspension of border security checks is kept all cases, with the exception of the rare occurrence where to an absolute minimum, a immediate action is required to protect life. In these cases, the prior approval of the Director General was still required. clear understanding of what constitutes health and safety grounds for suspension should be agreed. An operating policy for An operating policy for Secure ID was produced in June 2012. fingerprint verification of all visa This document clearly set out the procedures to be applied nationals (Secure ID) needs to be in conducting biometric verification checks using Secure ID. produced as a matter of urgency. Whilst we were on-site, we found that all staff at Birmingham It must take into account its Airport were carrying out these checks. importance relative to other checks contained within any new framework of border security checks.

Record-keeping at ports should be overhauled, ensuring that staff know what to record, and why, whilst keeping bureaucracy to a minimum. Management should ask for, and review, records of border security checks to inform development of policy. At the time of this inspection, changes had been made to the record-keeping process in Birmingham, with a number of records being kept. This included when:

- an IS81 form was issued;
- there was a WI hit; and
- an undocumented British or EU national was encountered.

A rigorous management assurance process needs to be put in place so that Ministers and the Agency can be assured that policy is being translated into practice on the ground.

However, more work is required to ensure that all staff are completing logs accurately and consistently.

At the time of our inspection. Central Region had drawn

At the time of our inspection, Central Region had drawn up a region-specific interim assurance framework. This was designed to assess compliance with operational delivery standards and provide assurance of record-keeping around operational delivery.

We noted that elements of our core criteria had been incorporated into the assurance framework.

At the time of our inspection, the framework was still being developed. We were told it would be refined and expanded over the remainder of 2012.

We noted that an inconsistent approach had been adopted by officers, when maintaining records at the PCP. These records had been signed off by managers, despite the inconsistencies we identified. More rigorous management assurance is therefore required to ensure the accuracy of these logs.

The UK Border Agency must ensure that any local initiative regarding suspension of border security checks does not contradict any new framework of border security checks and is lawful and properly authorised. At the time of our inspection, there were no local initiatives regarding the suspension of border security checks.

Service standards for passenger queuing times and staffing levels at ports should be reviewed to ensure that they are compatible with any new framework of border security checks.

This work is yet to be carried out.

Staff and managers assured us they were always required to carry out full checks, even when there were queues.

Appendix 1

Inspection Criteria

The criteria used in this inspection were taken from the Chief Inspector's Inspection Criteria. They provide a clear set of criteria against which we conduct our inspections, ensure that Inspectors are working to a common set of standards and enable the UK Border Agency and Border Force to know exactly what is expected of them.

Inspection criteria used for this inspection

Operational Delivery

- 1. Decisions on the entry, stay and removal of people should be taken in accordance with the law and the principles of good administration.
- 2. Customs and immigration offences should be prevented, detected, investigated and, where appropriate, prosecuted.
- 3. Complaints procedures should be in accordance with the recognised principles of complaint handling.

Safeguarding Individuals

- 4. All people should be treated with respect and without discrimination except where the law permits difference of treatment.
- 7. Functions should be carried out having regard to the need to safeguard and promote the welfare of children.
- 8. Personal data should be treated and stored securely in accordance with the relevant legislation and regulations.

Continuous Improvement

9. The implementation of policies should be continuously monitored and evaluated to assess the impact on service users and associated costs.

Appendix 2

Glossary

Term	Description
A	
Agency	Refers to the UK Border Agency.
Assistant Director	Senior manager within the UK Border Agency equivalent to a civil service Grade 7 position.
Assistant Immigration Officer	Junior grade, equivalent to an administrative officer. Supports Border Force staff in carrying out administrative and operational tasks linked to the Primary Control Point.
В	
Border Force	A separate operational command within the Home Office, responsible for frontline operations at air, sea and rail ports.
С	
Case Reference System	A web-based application that contains entry clearance data (visa information) from diplomatic missions overseas.
Chief Immigration Officer (CIO)	Team leader equivalent to Higher Executive Officer grade, responsible for the effective running of the Primary Control (immigration) Point.
Complaint	Defined by the UK Border Agency as; 'any expression of dissatisfaction about the services provided by or for the UK Border Agency and/or about the professional conduct of UK Border Agency staff including contractors'.
Customs	Collecting and safeguarding customs duties and controlling the flow of goods including animals, transport, personal effects and hazardous items in and out of the UK. This function is carried out by Border Force staff.
D	
Data Protection Act 1998	The Data Protection Act requires anyone who handles personal information to comply with a number of important principles. It also gives individuals rights over their personal information.
Н	
Her Majesty's Inspector of Immigration (Inspector)	The UK Border Agency senior manager (equivalent to Senior Executive Officer grade), with overall responsibility for the effectiveness of immigration operations on shift.
Home Office	The Home Office is the lead government department for immigration and passports, drugs policy, crime, counter-terrorism and police.

I			
Immigration Officer (IO)	Employees of Border Force, appointed by the Home Secretary, whose powers are conferred by the Immigration Act 1971 and who act in accordance with Immigration Rules. They have the power of arrest and detention conferred on them by the Immigration Act 1971, both at ports and inland.		
Interim Operational Instruction (IOI)	Short term guidance for staff, which usually needs to be reviewed after a set period of time.		
P			
Primary Control Point (PCP)	The area in an arrivals hall where Border Force staff make an initial decision on whether a passenger should be allowed entry into the UK without delay. All passengers must submit their passports/travel documentation to the officer making this decision.		
R			
Rostering	This refers to the process of assigning frontline staff to particular shifts.		
S			
Secondary Control Point (SCP)	The area where Border Force officials may be involved in the questioning of passengers or the searching of persons or baggage.		
Secure ID	An IT system which checks passengers' fingerprints at the immigration controls and verifies them against those previously provided during the visa application process.		
U			
United Kingdom Border Agency (UKBA)	The Agency of the Home Office responsible for enforcing immigration and customs regulations. It also considers applications for permission to enter and stay in the UK, including nationality and asylum applications. The UK Border Agency has been a full executive Agency of the Home Office since April 2009.		
\mathbf{W}			
Warnings Index (WI)	A database of names available to the UK Border Agency of those with previous immigration history, those of interest to detection staff, police or for matters of national security.		
Watch-house	A dedicated room which provides an overall view of the Primary Control Point and contains relevant IT equipment, including Home Office databases, CCTV monitors to assess the volume of arriving passengers, and Civil Aviation Authority (CAA) systems which show the status of flight arrivals and the number of passengers on board.		

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