

The Home Office response to the Independent Chief Inspector's report:

An Inspection of Border Force operations at Gatwick Airport (South Terminal)

September – December 2016

The Home Office thanks the Independent Chief Inspector of Borders and Immigration for this report.

Gatwick is the UK's second largest airport with more than 21 million passenger arrivals through its two international terminals in 2016, and with passenger numbers predicted to rise year on year. Border Force operations at Gatwick cover passenger and air freight arrivals, and the full range of immigration and customs activity.

To better meet this challenge Border Force at Gatwick has recently modernised its resource and deployment model to ensure that it can get the best out of available technology, and ensure that through the flexible deployment of frontline officers it can meet operational priorities and respond effectively to risk at the border. This has included a review of the use of customs trained staff across the airport. The approach has yielded significant results including an approximate 70% increase in Class A seizures at the same time as the Primary Control Point pressures were managed effectively, as this report acknowledges. Border Force deploys a mix of full and part time staff to provide the flexibility required with seasonal deployment at peak times as a key component of this approach.

Over the next 12 months Border Force at Gatwick plan to increase capability through additional training in behavioural detection and collaborative working with partner agencies.

The Home Office response to the recommendations

Confirm that the Border Force resourcing model for Gatwick Airport (both terminals) meets current business needs, is resilient and is sustainable in the short to medium-term (3-5 years), ensuring that:

Recommendation 1 (a)

There are sufficient permanent, fully-trained Gatwick-based Border Force officers to deliver core immigration and customs functions efficiently and effectively during ‘non-peak’ periods

1.1 Accepted

1.2 The current resourcing model ensures delivery of core Immigration and Customs functions. This is periodically reviewed by Border Force at Gatwick to ensure recruitment keeps pace with the ever changing operational environment. Reviews of the model continue to ensure resilience, and whilst permanent staffing at the time of the inspection was below the required level, there is an active recruitment programme in place to ensure staffing meets the required level across the command by October 2017, with further recruitment trawls planned thereafter to maintain required numbers.

Recommendation 1 (b)

Rosters are maintained for key roles, such as the Controlled Waiting Area (CWA), e-Passport gates referral desk, and Roving Officer, so that these are always covered when these functions are required

2.1 Partially Accepted

2.2 In an operationally dynamic environment not all support functions work best when managed through a fixed roster. Border Force at Gatwick does, however,

accept the need to improve its record keeping in relation to some of these functions in order to assist in its management of these important roles.

2.3 The role of referral officer on the e-passport gates is already managed through a fixed point or roster system. There will, however, be occasions when additional (sometimes specialist) referrals officers are needed.

2.4 The Controlled Waiting Area (CWA) at Gatwick is always monitored by a designated officer whenever there is a passenger present and the record of that monitoring has now been expanded to include the details of the officer deployed as monitor.

2.5 Local procedures confirm that a designated Roving Officer will be deployed at all times when the e-Gates are operational. Since this inspection the details of officers deployed in this role are now recorded in a log.

Recommendation 1 (c)

Officers with specialist skills are not tied to PCP desk duties where this would result in their specialist function being suspended

3.1 Partially accepted

3.2 Operating the Primary Control Point (PCP) does not mean that officers with specialist skills are unable to offer advice and support, nor does it prevent them from using their additional training. This is often a flexible and more efficient way to use operational resources. However, as a follow on from the recruitment programme mentioned above, Border Force at Gatwick will review its approach to the deployment of staff with specialist, additional skills on the PCP to ensure it represents the most effective operational response. This will be conducted by the end of October 2017.

Recommendation 1 (d)

The rationale for resource deployments and plans is communicated effectively to the members of staff affected

4.1 Accepted

4.2 Officers are already briefed at the beginning of a shift in relation to current operational trends and where appropriate the rationale for deployments is communicated. In addition since this inspection Border Force at Gatwick has introduced electronic briefing screens with daily updates to support the briefing process. Early feedback on the new system is positive and a review of the electronic briefing will be conducted by the end of October 2017.

Recommendation 1 (e)

Seasonal staff used to cover peak periods for passenger arrivals receive training, mentoring and supervision that put them on a par with permanent Border Force officers fulfilling the same functions in terms of their efficiency and effectiveness

5.1 Partially accepted

5.2 It is important to note that the scope of the seasonal worker role is confined to working on the Primary Control Point (PCP) alongside permanent officers, but it is not extended to in-depth or specialist areas such as further interviews, customs or detention. The Home Office therefore considers it appropriate to provide seasonal workers with a tailored training course which focuses on forgery and other skills required at the PCP. More complex casework is dealt with by permanent and specialist teams as required.

5.3 Border Force applies very specific criteria when recruiting seasonal workers which means that all seasonal workers have previous immigration, customs, police or military experience and the skills sets associated with those roles.

5.4 However, a complete review of the Seasonal Workforce is currently underway by Border Force, with the assistance of HR, and this will include standard training requirements. Initial findings are expected by the end of August 2017.

Recommendation 1 (f)

Full use is made of the skills and experience of officers called in from elsewhere to assist Border Force Gatwick (e.g. Brigade Teams), and arrangements for their deployment are demonstrably cost-efficient

6.1 Accepted

6.2 The model used to deploy brigade teams as set out in this report has been reviewed and a new model for the south region, including Gatwick, will be put into operation over the course of 2017/18.

Recommendation 1 (g)

Resource planning and deployment takes account of the objectives, priorities and plans of partner agencies and of Gatwick Airport Limited (GAL), identifying and jointly addressing any gaps

7.1 Partially accepted

7.2 Border Force is mindful of the operational needs and priorities of other law enforcement and commercial partners and in particular has a successful track record of collaboration with Gatwick Airport Limited. However the security of the border is its top priority and this must take precedence. For example when a significant number of arriving passengers are not eligible to use e-Passport gates, the most effective and safe operational response is for banks of gates to be closed and more resources diverted to manual desks or other law enforcement functions.

In relation to safeguarding:

Recommendation 2 (a)

Clarify the ‘best interests of the child’ and the ‘vulnerable adults’ elements of the safeguarding e-learning package, and test that they are properly understood by frontline officers

8.1 Accepted

8.2 Border Force ensures that in carrying out its functions, child safety and welfare is always given full and careful consideration, taking into account all available information and working closely with children’s services. The Office of the Children’s Champion (OCC) will clarify the extent to which the ‘Keeping Children Safe – General Awareness’ e-learning, which serves as a short introduction to the section 55 child safeguarding duty for all staff performing an operational borders or immigration role, sufficiently covers all safeguarding obligations at the border including ‘best interests of the child’ as part of its wider review of training material. New e-learning is expected to be rolled out from August 2017.

8.3 Border Force already has Modern Slavery e-learning in place which focuses on vulnerable adults and must be completed by all appropriate operational Border Force staff. This package was updated in January 2017 and Border Force will ensure that it is subject to regular reviews to ensure it continues to meet learning needs.

8.4 The OCC’s review is being conducted alongside the Border Force’s Operational Training review, which is considering the most effective and appropriate methods for delivering training to the front line. This is due to be concluded by the end of July.

Recommendation 2 (b)

Ensure that officers in the customs channels recognise that they are responsible for safeguarding as much as officers on the immigration controls

9.1 Accepted

9.2 Training on child safeguarding is mandatory for all appropriate operational Border Force staff. The specialist safeguarding team at Gatwick will provide additional targeted information to teams working in the customs channel by the end of October 2017 to address the shortcomings identified by this inspection. Since the inspection, Gatwick has included both Border Force higher officers and Border Force officers working in the Customs Channels as part of the specially trained Safeguarding Team. This is in recognition of the specific role that they play in addressing child safeguarding issues in that area of business. A further review will be undertaken in September 2017 when the next training programme is planned to assess impact and address any further training needs.

Recommendation 2 (c)

Define the Roving Officer role, taking full account of logistics (positioning, passenger flows, number of e-Passport gates in operation) and ensure that officers undertaking this role are clear about what is required of them

10.1 Accepted

10.2 The Roving officer role was defined in March 2016, in advance of a trial allowing children aged 12-17 years old from the EEA and Switzerland to use e-Gates.

10.3 An evaluation of the 12-17 e-Gates trial has been completed, and found that the presence of a Border Force officer ahead of e-Gates has border security benefits beyond child safeguarding. A wider border security role is now being defined for the roving officer and guidance will be provided for officers by the end of July 2017.

In relation to the customs controls:

Recommendation 3 (a)

Monitor how much Commodity and Response Team (CART) time is spent supporting former immigration functions, and consider reviewing their list of duties or change their description as ‘dedicated teams in the customs channels’ to reflect the reality

11.1 Accepted

11.2 The expansion of the role of the Commodity and Response Team (CART) was part of planned activity in customs and wider border security work to improve overall operational performance. The effectiveness of these changes will be reviewed by the end of July 2017. The role and deployment of the CARTs will be included in this review, and will also examine responsibilities across all business areas to ensure an effective balance in the allocation of both immigration and detection related tasks.

Recommendation 3 (b)

Ensure that there is a visible Border Force presence in the customs channels for all high-risk flights

12.1 Rejected

12.2 Whilst Gatwick officers are regularly stationed in the customs green channel and there is always an officer in the red channel when passengers arrive in order to deal with declarations, it is important that managers are able to deploy resources to respond to risks in the most effective way. This may not always involve a visible presence in the green channel as detection teams have a number of other methods and responses available to them, including joint work with other agencies, which have an equal or better effect in the detection and prevention of smuggling and revenue fraud.

In relation to record keeping and assurance checks:

Recommendation 4 (a)

Ensure that all officers at Gatwick understand and comply with the requirement to create accurate, complete and auditable records of all decisions and actions, including (but not limited to) detentions, grants and refusals of entry, Temporary Admissions, searches of persons and baggage, and seizures (providing the necessary IT access for the efficient capture of the latter)

13.1 Partially Accepted

13.2 In a frontline environment it is important to ensure that officers record accurately that which is legally and operationally required whilst not being overwhelmed with administrative processes that could delay or even impede frontline delivery. It would not represent the best use of frontline officer time to record every stage of every interaction.

13.3 Refresher training and up-skilling in frontline record keeping, as well as new training to address the Immigration Bail changes, will be addressed as part of a change action plan developed by Border Force Gatwick in response to this inspection. Relevant training will be completed by the end of January 2018.

13.4 Border Force Gatwick will also carry out a review by the end of July 2017 to ensure that there is sufficient access to IT systems to meet operational requirements. This will include checks to ensure that the number of HMRC system terminals, for which there is an access charge, does not exceed operational requirements.

Recommendation 4 (b)

Review the targets set for first line quality assurance to ensure that they are meaningful and that they are being thoroughly and systematically applied

14.1 Accepted

14.2 Operational Assurance Directorate conducted a review, informed by its own assurance reports and external reviews, including recent ICI inspections, of the first line assurance framework for Border Force in March 2017. Plans to drive improvements in compliance with first line assurance activity have been developed for implementation over the course of 2017/18. Data provided by a new automated assurance toolkit will inform this first line activity.

In relation to intelligence:

Recommendation 5 (a)

Review the intelligence training provided to Border Force officers, including seasonal workers, and ensure that it covers (at least) national, regional and local intelligence roles, responsibilities and products; and the importance of providing honest and timely feedback on intelligence alerts

15.1 Accepted

15.2 The requirements of the role of a frontline officer include an awareness of current threats to the border and an understanding of how to gather and share relevant intelligence. Transformation work in Border Force Intelligence Directorate includes more focused training, guidance, communications, the establishment of clear tasking governance and the building of stronger relationships between Intelligence Directorate and the frontline. As an example, from May 2017, Border Force Intelligence Directorate intends to roll-out a further series of regional road shows to provide a clearer connection between the frontline and intelligence teams. A review on progress will take place by the end of March 2018.

Recommendation 5 (b)

Provide officers with written guidance about referrals (what to refer, when, to whom and how)

16.1 Accepted

16.2 The Border Force Intelligence Directorate transformation programme includes proposals to provide all frontline officers with much clearer and easier ways to provide information for intelligence purposes irrespective of where they are deployed (on the Primary Control Point, in customs channels, whilst on operations or out in the field). This will require a technical solution which has a provisional delivery estimate of the end of 2018.

Recommendation 5 (c)

Ensure that responding effectively to intelligence alerts does not result in core customs functions being suspended when 'high-risk' flights are passing through the customs channels.

17.1 Partially accepted

17.2 The Border Force Operating Mandate clearly sets out the requirements for responding to intelligence alerts including what action to be taken when interventions are not possible. Within that framework it is important that operational managers retain the flexibility to deploy resources as required at any time to protect border security most effectively. The specific requirement to attend flights where carriers have advised that passengers subject to alerts have been offloaded prior to departure is currently being reviewed.