



An inspection of Border Force operations at Glasgow and Edinburgh airports

January – March 2019

David Bolt

Independent Chief Inspector of
Borders and Immigration

An inspection of Border Force operations at Glasgow and Edinburgh airports

January – March 2019



© Crown copyright 2019

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.uk/official-documents.

This publication is also available at www.gov.uk/ICIBI.

Any enquiries regarding this publication should be sent to us at www.gov.uk/ICIBI

Independent Chief Inspector of
Borders and Immigration,
5th Floor, Globe House,
89 Eccleston Square,
London SW1V 1PN
United Kingdom

ISBN 978-1-5286-1420-7

CCS0619431914 10/19

Printed on paper containing 75% recycled fibre content minimum.

Printed in the UK by the APS Group on behalf of the Controller of Her Majesty's Stationery Office.

Our purpose

To help improve the efficiency, effectiveness and consistency of the Home Office's border and immigration functions through unfettered, impartial and evidence-based inspection.

All Independent Chief Inspector of Borders and Immigration inspection reports can be found at www.gov.uk/ICIBI

Email us: chiefinspector@icibi.gov.uk

Write to us: Independent Chief Inspector
of Borders and Immigration
5th Floor, Globe House
89 Eccleston Square
London, SW1V 1PN
United Kingdom

Contents

| | |
|---------------------------|----|
| Foreword | 2 |
| 1. Purpose and Scope | 3 |
| 2. Methodology | 4 |
| 3. Summary of conclusions | 6 |
| 4. Recommendations | 9 |
| 5. Background | 10 |
| 6. Inspection findings | 11 |
| Annex A | 40 |
| Annex B | 42 |
| Acknowledgements | 44 |

Foreword

In the 10 years since it was created, ICIBI has inspected Border Force operations at a number of major UK airports and seaports, focusing on the efficiency and effectiveness of the fixed immigration and customs controls for arriving passengers.

Previous inspections have looked at one airport at a time. As might be expected, however, many of the findings and the recommendations that have flowed from them have been broadly similar at each airport.

With this in mind, this inspection looked to test a new streamlined approach to airport inspections that could be repeated at other 'clusters'¹ of airports without the need for a large team of inspectors and extensive preparatory work. The aim was to use the experience and knowledge gained from ICIBI's other airport inspections, together with the published 'ICIBI's 'expectations' of asylum, immigration, nationality and customs functions',² to produce a short, easily replicated inspection process and report. In that it still required a great deal of effort and took longer to complete than was planned, it was a qualified success. But, the next time will be easier as a result.

This inspection examined Border Force operations at Glasgow and Edinburgh Airports, respectively the sixth and eighth busiest airports in the UK for passenger traffic. It found that Border Force's management of the immigration and customs controls was effective from a border security perspective, but there were criticisms from the airport operators and from passengers of its efficiency in managing the immigration queues, not helped by the absence of a robust, standardised way of measuring queuing times.

The report makes just 3 recommendations, one related to queue measurement and the other 2 focused on ensuring that Border Force operational managers, not just at Glasgow and Edinburgh, understand and articulate their risks thoroughly and consistently. At Glasgow and Edinburgh this means engaging more effectively with the airport operators, ensuring that staff 'rostering' is efficient and seen as reasonable, maximising ePassport gate uptake, improving the recording and quality assurance of decisions, and ensuring that safeguarding strategies and actions test for new or changing threats as well as targeting known "high risk" flights.

This report was sent to the Home Secretary on 13 June 2019.

1 A "cluster" could be defined geographically or by some other shared characteristic, such as size.

2 <https://www.gov.uk/government/publications/icibi-expectations-for-inspection> - see Annex B

1. Purpose and Scope

- 1.1** This inspection examined the efficiency and effectiveness of Border Force operations at Glasgow and Edinburgh Airports. In doing so, it sought to understand the particular demands at each airport and looked at how Border Force was resourced to meet them and at how it was performing.
- 1.2** This inspection was also designed to test a new streamlined approach to airport inspections that could be repeated at other 'clusters' of airports without the need for a large team of inspectors and extensive preparatory work. The aim was to use the experience and knowledge gained from ICIBI's many previous airport inspections, together with the published 'ICIBI's 'expectations' of asylum, immigration, nationality and customs functions', to produce a short, easily replicated inspection process and report.

2. Methodology

2.1 Inspectors considered the efficiency and effectiveness of Border Force operations at Glasgow and Edinburgh Airports against the published 'ICIBI's 'expectations' of asylum, immigration, nationality and customs functions'.

2.2 To that end, inspectors:

- reviewed the findings and recommendations from previous ICIBI airport inspections, specifically:
 - 'Inspection of Border Force Operations at Heathrow Airport (June-October 2014)', published July 2015
 - 'An Inspection of Border Force Operations at Manchester Airport (July – October 2015)', published April 2016
 - 'A re-inspection of Border Force operations at Heathrow Airport (May 2016)', published September 2016
 - 'An inspection of Border Force operations at Gatwick Airport (South Terminal) (September – December 2016)', published July 2017
 - 'An Inspection of Border Force Operations at Stansted Airport', published March 2018
- reviewed relevant open source material, plus documentary evidence provided by Border Force, including:
 - material published on GOV.UK
 - internal Border Force documents³
 - policies, instructions and guidance available and applicable to officers in the Border Force North region
 - performance data and management information

³ Including Border Force Business Plan 2012 – 2022, Border Force Control Strategy 2017, Strategic Risk Summary, Border Force Operating Mandate, Border Force Immigration Guidance, Customs Guidance and Assurance Checks

- examined:⁴
 - 100 randomly-selected immigration “port” files (50 from each airport) created between 15 January 2018 and 15 January 2019, comprising:
 - 20 “refuse leave to enter” cases after the passenger was required to submit to further examination at the immigration controls (including cases involving immigration bail and detention)
 - 20 “grant leave to enter” cases (as above)
 - 10 cases where no decision had been made
 - 100 randomly-selected customs records, primarily copies of officers’ notebooks but also screenshots from HMRC’s Centaur database, (50 from each airport) created between 15 January 2018 and 15 January 2019 involving the detection of customs-controlled goods/ substances resulting from targeted and non-targeted activity
- conducted onsite visits at Glasgow Airport from 26 February 2019 to 1 March 2019 and at Edinburgh Airport from 5 March 2019 to 8 March 2019 to:
 - observe the immigration and customs controls in operation
 - interview and conduct focus groups with Border Force officers from Assistant Officer (administrative) to Regional Director (senior manager)
- spoke to the airport operators at both airports
- on 25 March 2019, presented the high-level emerging findings to the Border Force North Region Director and Deputy Director, the Assistant Directors (Grade 7) for each airport, and staff from the Border Force Operational Assurance Directorate

4 As detailed in the report, Border Force was unable to provide some of the selected records, in the case of some officer notebooks this was because they were stored in the officer’s personal locker and the officer was not on duty. Home Office internal guidance requires that “Official notebooks must be treated as ‘official sensitive’ material. When they are not required for use or have been taken out of use they must be stored securely on official property in a locked safe, cabinet or cupboard. Completed notebooks must be stored in a way that allows them to be identified and retrieved at short notice.” Some of the records provided were recalled for operational reasons before inspectors could examine them. In total 55 immigration records were examined (25 from Glasgow and 30 from Edinburgh), and 85 customs records (38 from Glasgow and 47 from Edinburgh).

3. Summary of conclusions

- 3.1** Glasgow and Edinburgh are amongst the busiest airports in the UK in terms of passenger numbers. In 2018, Edinburgh was sixth busiest and Glasgow eighth. This is reflected in the Border Force budgets and staffing allocations for both. Staffing levels had improved during the last year, with additional staff recruited as “part of Brexit planning”. Border Force had also made changes to induction training for new officers, which meant that they had more all-round immigration and customs skills on arrival at port and, subject to on-the-job mentoring, were more deployable.
- 3.2** While staffing levels appeared to inspectors to be sufficient, the onsite phase of the inspection was not during peak season, and managers at both airports had flagged their concerns with regional management that they did not have enough permanent, experienced staff and were overly-reliant on Seasonal Workforce staff. Meanwhile, staff criticised the team-based rostering in operation at both airports, where it “gets bums on seats but not the skills in the right place”. Whether the team-based approach was “inflexible” and “unnecessary” as some argued, it seemed to require regular adjustment and be time-consuming for the local Operational Planning Units.
- 3.3** At Glasgow and Edinburgh, as at all UK airports, for the airport operators and carriers, and almost certainly for the majority of international travellers, the key to whether Border Force is seen as efficient and effective is how long arriving passengers have to queue at the immigration controls. Nationally, Border Force applies a 25-minute queuing time maximum for EEA arrivals and a 45-minute maximum for non-EEA arrivals, which it looks to achieve 95% of the time. Inspectors examined how Border Force was measuring queue times at Glasgow and Edinburgh and how it was performing against these standards, at the same time recognising that the industry and the travelling public considers them to be too long.
- 3.4** At both airports, Border Force was using a simple system of handing cards to passengers as they joined the immigration queue, annotated with the time, which they collected as soon as the passenger reached the Primary Control Point (PCP), again noting the time. The records for December 2018 for each airport showed that each had met the 25 or 45 minutes for 95% of passengers, and the average waiting times were well under the maxima, albeit Edinburgh had also exceeded both maxima for a small number of passengers. However, neither airport appeared to have recorded as many measurements as required by Border Force’s own guidance, raising doubts about the process, the reliability of the results and how this would work during peak times.⁵

⁵ In November 2018, the Home Office accepted a recommendation in ‘An inspection of Border Force operations at south coast seaports (January – May 2018)’ to “Publicise the Service Level Agreement (SLA) for queuing times for arriving passengers at south coast ports, including an explanation of how this is calculated (having first standardised the method of doing so)”. In its response, it stated: “Work is already underway to evaluate current approaches to queue measurement with a view to standardising the approach. The configuration of the port and type of traffic are major factors constraining our ability to operate a single methodology. This activity, due to complete by the end of the year, will inform future measures which will then be shared with relevant stakeholders to gain their input before finalising.”

- 3.5** ePassport gates are installed at both Glasgow and Edinburgh Airports. Making effective use of these, which includes extending eligibility to use them to travellers from Australia, Canada, Japan, New Zealand, Singapore, South Korea and the United States from mid-2019, is a key part of the Home Office’s strategy for processing passengers quickly and securely through the border and allowing Border Force officers “to focus on other priority work such as identifying potential victims of trafficking”.⁶
- 3.6** Home Office figures for December 2018 showed that roughly 75% of all passengers arriving at Glasgow and Edinburgh were eligible to use an ePassport gate. At Edinburgh, over 80% of eligible passengers did so, but at Glasgow uptake was lower, 67%. Edinburgh had a slightly higher rate of redirections to a PCP desk, and Glasgow occasionally closed the gates for “high-risk” flights, but this did not explain the different levels of usage.
- 3.7** Safeguarding is a Border Force priority. This was an area where the differences between the 2 airports was most marked, with Glasgow by far the busier of the Safeguarding and Modern Slavery teams. By way of explanation, inspectors were told that Glasgow receives a large number of low costs flights from Eastern Europe, including from Romania, which Border Force regard as “high risk” from a safeguarding perspective. Border Force stated that it was aware of the risks of displacement, however no evidence was presented to show that serious consideration had been given to the possibility that traffickers may have turned to using Edinburgh in response to Border Force’s efforts at Glasgow, judging that the higher-priced routes were cost effective.
- 3.8** Examination of a sample of immigration and customs records from Glasgow and Edinburgh suggested that record-keeping at both airports needs to improve. This has been a theme in inspections since ICIBI was created, not just for Border Force but for the Borders, Immigration and Citizenship System as a whole. Part of the answer is effective quality assurance, the more so where staff are new. Inspectors were told that there was 100% assurance checking at Glasgow and at Edinburgh, in part because of the numbers of inexperienced or newly-recruited staff. There was evidence of assurance checks in some of the files examined, but not all.
- 3.9** A new assurance process had been in place at both airports since January 2019. This gave local managers discretion to tailor quality assurance checks according to their assessment of particular risks, which they welcomed. It was too soon for inspectors to tell how effective this was in terms of maintaining Operating Mandate compliance and the quality of officers’ work, but Border Force will need to guard against managers taking an overly optimistic view of their risks and under-investing in assurance checking.
- 3.10** At ports and airports, Border Force has to rely on others to be able to work efficiently and effectively. This includes law enforcement agencies, in particular Police Scotland in this instance, but also the airport operators, airline staff, security staff, other ground staff and airport workers. Where passengers are detained, it also relies on Mitie,⁷ who hold the contract for managing the holding facilities at Glasgow and Edinburgh and for escorting detainees.

⁶ Home Office statement made in October 2018 announcing the extension of eligibility to use ePassport gates. The extended eligibility was implemented on 20 May 2019, having initially been planned for June 2019.

⁷ Mitie is a commercial company that provides a number of services, including facilities management. It holds the Home Office contract for managing the short-term holding facilities at Glasgow and Edinburgh Airports, along with other certain Immigration Removal Centres and the escorting of immigration detainees to and from these facilities.

- 3.11** Typically, relationships between Border Force operational managers and staff, and the people they deal with day-to-day are good and are made to work. Based on what inspectors were told and observed, this was true at Glasgow and Edinburgh Airports, notwithstanding some “challenging” conversations at the former about queuing times. There was also some evidence that Border Force at the regional level was prepared to step in, if required, for example providing part-funding for the expansion of the holding facilities at Glasgow.
- 3.12** However, as inspections at other air and seaports have found, there were a number of issues at Glasgow and Edinburgh that called for an organisational response from Border Force rather than a local or even regional one. These included providing a clear and consistent message about queuing times and queue measurement, but more fundamentally they concerned what Border Force required the airport operator to provide in terms of accommodation and layout (in the passenger areas, at the controls and behind the scenes) and what of this it was prepared to fund.
- 3.13** In summary, in terms of its overall management of the immigration and customs controls at Glasgow and Edinburgh Airport, the inspection found Border Force to be broadly efficient and effective. However, a number of areas for improvement were identified at both airports. Some of these were beyond the local Border Force management to resolve, raising the question of how visible they were to Border Force regional and top management and who “owned” the risks. The recommendations are aimed at clarifying this.

4. Recommendations

The Home Office should:

1. Review the guidance, support and challenge provided to Border Force operational managers regarding the completion of local risk registers, with the aim of ensuring a common understanding of how to complete them thoroughly and consistently.
2. In the case of Glasgow and Edinburgh Airports, ensure that the local risk registers capture all of the risks and issues identified in this inspection, including the need for:
 - better engagement with the airport operators regarding Border Force’s requirements (for accommodation and other facilities), commitments (such as agreed service levels) and obligations (for example, to fund functions, improvements or maintenance)
 - “rosters” that are supported by managers and staff, that do not require constant adjustment and are not overly reliant on Seasonal Workforce staff
 - strategies for maximising ePassport gate uptake
 - improved recording and protection of information and data
 - confirmation that the risk assessments underpinning the first-line quality assurance regimes are evidence-based
 - safeguarding strategies and actions that test for new or changing threats as well as targeting known “high risk” flights

making it clear which risks are “owned” locally, which regionally and which organisationally, and identifying mitigating actions and contingencies.

3. Provide an update on the evaluation of approaches to queue measurement, including progress towards standardisation, consultation with stakeholders and publication of a Service Level Agreement (the Home Office response to the Independent Chief Inspector’s report: ‘An Inspection of Border Force Operations at South Coast Seaports (January – April 2018)’ refers).

5. Background

Glasgow and Edinburgh Airports

- 5.1 Border Force regards both Glasgow and Edinburgh as “medium-sized” airports. Edinburgh is the larger and busier of the 2 – see Figure 1. Since 2013, it has seen a 46% increase in the number of passengers it handles.⁸

Figure 1

| Airport Headline Data Comparison (data for 2018) | | |
|--|--|---|
| | Glasgow Airport ⁹ | Edinburgh Airport ¹⁰ |
| Description | Scotland’s principal long-haul airport | Scotland’s busiest and UK’s 6th busiest airport |
| Hours of Operation | 24/7, 365 days a year | 24/7, 365 days a year |
| Terminals | 1 | 1 |
| Airlines | 30 | 37 |
| Destinations | 100 + | 157 |
| Passengers | 9.9 million | 14.3 million |
| Cargo | 13,033 tonnes | 42,000 tonnes |
| Aircraft movements | 102,000 | 130,000 |

- 5.2 In terms of passenger numbers, Glasgow Airport is the second-busiest airport in Scotland after Edinburgh. They are respectively the eighth- and sixth-busiest airports in the UK. At both airports, the busiest routes were domestic, mostly to and from London airports. Glasgow-Dublin and Edinburgh-Dublin were also both busy routes.¹¹ Since April 2019, Emirates has operated a daily A380¹² flight from Dubai to Glasgow.
- 5.3 In 2018, the busiest international route was to and from Edinburgh and Amsterdam, with Paris, Copenhagen, Frankfurt, Geneva and several Spanish holiday destinations,¹³ in the top 10. Amsterdam and the same Spanish destinations appeared in the top 10 international routes to and from Glasgow Airport in 2018, but the busiest route was to and from Dubai. Berlin and Toronto also featured in Glasgow’s top 10. Some routes and carriers at both airports are seasonal.

8 Civil Aviation Authority data: https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Data_and_analysis/Datasets/Airport_stats/Airport_data_2018_annual/Table_01_Size_of_UK_Airports.pdf

9 <https://www.glasgowairport.com/about-us/> (accessed January 2019)

10 <https://www.edinburghairport.com/about-us/facts-and-figures> (accessed January 2019)

11 Dublin is within the Common Travel Area (CTA), which comprises the UK, the Channel Islands, the Isle of Man and the Republic of Ireland. A person who has been examined for the purposes of immigration control at the point at which they enter any one of the 4 areas of the CTA does not normally require permission to enter any other part of the CTA.

12 The Airbus A380 is the world’s largest passenger airliner, with seating capacity for over 500 passengers.

13 Alicante, Lanzarote, Malaga, Palma de Mallorca, Tenerife.

6. Inspection findings

Introduction

6.1 The findings are reported against the 'ICIBI's 'expectations' of asylum, immigration, nationality and customs functions'.

Expectation

Background and explanatory documents are easy to understand and use

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

Border Force's purpose, responsibilities and priorities

6.2 Border Force's purpose, responsibilities and priorities are explained on GOV.UK:

"Border Force secures the border and promotes national prosperity by facilitating the legitimate movement of individuals and goods, whilst preventing those that would cause harm from entering the UK. This is achieved through the immigration and customs checks carried out by our staff at ports and airports. Our officers work at 140 sea and air ports across the UK and overseas."

6.3 The Border Force page goes on to describe Border Force's responsibilities for:

- “• searching baggage, vehicles and cargo for illicit goods or illegal immigrants
- patrolling the UK coastline and searching vessels
- gathering intelligence
- alerting the police and security services to people of interest.”

6.4 Border Force's priorities are listed as to:

- “• deter and prevent individuals and goods that would harm the national interests from entering the UK
- facilitate the legitimate movement of individuals and trade to and from the UK
- protect and collect customs revenues for trade crossing the border
- provide excellent service to customers
- provide demonstrable effectiveness, efficiency and value for money.”

[Guidance on “Entering the UK”](#)

6.5 Elsewhere on GOV.UK there is guidance on “Entering the UK”. This appears under “Visas and immigration” as well as via the Border Force landing page. It sets out the requirement for a valid passport or identity document to enter the UK, and links to the visa requirements for different nationalities. It was updated to reflect the “rights and status” of EU citizens living in the UK, including in the case of the UK leaving the EU without a deal. It also refers to what passengers may bring with them and what they need to declare to customs.

6.6 Under “At border control” the guidance states that “Your passport or identity card will be checked”. It instructs travellers:

“You must:

- have your passport or identity card ready - remove it from a holder or wallet if you use one
- remove your sunglasses if you’re wearing them
- move through passport control together if you’re in a family”

6.7 The guidance distinguishes between passengers “from an EEA country and Switzerland” and those “from a non-EEA country”. For the former, the focus is on encouraging use of the EU/ EEA channel or ePassport gate (if eligible). For the latter, the aim appears to be to prepare the passenger to be ready to explain why they are coming to the UK and to present supporting documents.

6.8 Under “If you’re refused entry”, the guidance explains:

“You’ll be told in writing:

- why you’ve been refused entry to the UK
- if you can appeal against the decision
- when you will be removed from the UK

You’ll usually have to leave the UK immediately.

You may be allowed into the UK temporarily (usually for up to a week) but your passport will be taken from you and you must report to immigration officers at set times.”

6.9 The guidance also describes “Baggage checks”, including duty-free allowances, making declarations to “customs” (it does not refer to Border Force), and courses of action where goods have been seized, including how to seek restoration or to make a complaint.

[Information available from the Glasgow and Edinburgh Airports websites](#)

6.10 The Glasgow Airport website also has information for arriving passengers. Under “Immigration”, it states:

“Please follow the signs and make your way to the baggage reclaim area via passport-border control (UK Border Force). Have your passport and all relevant documents ready – this will help speed up the process and reduce the amount of time you have to queue.

If you have items to declare

- Please go to the Customs red point.

If you have nothing to declare

- If your journey started in a European Union country, use the blue exit.
- If your journey began outside the European Union, use the green exit.

CHECK YOUR PASSPORT VALIDATION

We advise that you check the validity of your passport before travelling. Your passport must not expire during your visit to the United Kingdom. Please do this well in advance of your date of travel so you have time to renew it if the expiry date occurs during your stay in the United Kingdom.”

- 6.11** The information provided on the Edinburgh Airport website for arriving passengers is more extensive. It tells passengers who have arrived on an international flight that “Step one” is the immigration and passport control:

“There are three separate areas in our immigration hall:

- European Economic Area (EEA)¹⁴ and Swiss nationals
- Non-EEA (all other nationalities)
- EEA and Swiss nationals with chipped passports (eligible [sic] to use an electronic passport gate)

When you present yourself at one of the Border Control desks you will be asked for your passport or travel documents and any additional supporting documentation necessary for your visit.

Please remember that your passport must not expire during your visit to the United Kingdom.

To make sure you pass through Border Control as easily as possible, follow these steps:

- If you are a non-EEA national, you must fill out a landing card before arriving at one of the passport desks
- Please remove passport covers before presenting your passport to a Border Force Officer
- If your passport has an electronic chip you can use one of our electronic passport gates. A member of airport staff will be able to direct you.

For more information about necessary requirements for access into the UK, visit the UK Government website.”

The arrivals areas for domestic and international passengers are on the ground floor of the terminal building.

- 6.12** The website goes on to describe how to use an electronic passport gate (ePassport gate). However, it states, incorrectly, that: “Passengers under the age of 18 are unable to use this facility.” When clicked,¹⁵ the embedded video that “explains who is eligible for ePassport gates and how to use them” was “Unavailable”. A further video, that “provides passengers with general information on how to prepare for the UK Border, such as having landing cards ready and who is eligible to use ePassport gates” was also “unavailable”.

¹⁴ The countries are listed.

¹⁵ On 6 May 2019.

6.13 A third video that “provides passengers with important information on what goods they can and cannot bring into the UK” did work. This 2-minute cartoon, produced by Border Force, was simple and generally clear. However, in describing “the restrictions on the quantities and value of tobacco, alcohol and gifts you can bring into the UK” it states: “if you fail to declare items over your allowances these may be seized”. This is misleading. In reality, where Border Force identifies that a passenger has undeclared items in excess of their non-EU allowance the law requires that all such goods are seized, including the permitted duty-free amount.¹⁶

6.14 The website tells arriving passengers that: “For more information on what items are permitted through Customs please visit the Home Office website”, which is hyperlinked. It concludes with: “For your safety please do not carry anything through Customs for anyone else or bring goods into the UK which are prohibited. If you are unsure about your duty-/tax-free entitlement please go to the Customs enquiry point located in the baggage reclaim hall.

There are three different ways to exit Customs:

- **Red** — If you have goods to declare
- **Blue** — If you are arriving from an EU country
- **Green** — If you have travelled from a non-EU country”

Conclusions

6.15 The GOV.UK description of Border Force’s purpose, responsibilities and priorities is clear, as is the guidance on “Entering the UK”. But, while it is reasonable for Border Force to assume that the majority of passengers arriving at Glasgow and Edinburgh Airports on international flights will have a general understanding of the requirement for immigration and customs controls, it cannot assume that all passengers will have accessed these GOV.UK pages or will know how these processes will work in detail.

6.16 It is perhaps more likely that arriving passengers will have looked at the Glasgow or Edinburgh Airport websites, in which case they may have seen the entries for arriving passengers.

Expectation

Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

Processes

6.17 At Glasgow and Edinburgh as at all UK airports, the primary concern of the airport operator and of the carriers is to direct arriving international passengers efficiently and effectively to and through the relevant controls and on their way.

¹⁶ Previous airport inspections (Gatwick North Terminal 2012, Heathrow Terminal 5 2015 and 2016) had found that Border Force officers were exercising discretion unlawfully to allow passengers to retain the duty-free amount and Border Force committed to ensuring that this practice ceased.

6.18 Border Force shares that objective, but with the important caveat that preventing individuals and goods that would cause harm from entering the UK is also a priority. During this inspection, as in others, Border Force officers at all levels were clear with inspectors that they saw their primary aim as ensuring that the border was secure.

6.19 The layout of the airport is a major factor in how these “processes” work.

Glasgow Airport layout

6.20 Glasgow Airport has one International Terminal with a single Arrivals Hall, a Baggage Hall, and a Customs Hall. The latter has split routes for “EU arrivals” and “Nothing to Declare”. Passengers who wish to declare items are required to seek assistance via a red telephone, situated in the Baggage Hall, which connects to the Border Force customs office.

6.21 The Arrivals Hall has 9 immigration control desks (PCPs) set out in a line, plus 5 ePassport gates set at right angles to the PCPs. Of the 9 desks, 2 are generally used for crew or special assistance passengers,¹⁷ who are directed to the front of the immigration queue and to the designated desks. Where a PCP desk is not in use it should be cordoned off with a tensile barrier to prevent passengers from breaching the control.

6.22 The Arrivals Hall (the Hall) was expanded in early 2018 to accommodate more passengers and reduce queuing in the corridor leading to the Hall. The airport operator told inspectors that the expansion had helped to improve queue management as more passengers were able to see the controls as they joined the queue and therefore have a better sense of how long they would be in the queue. However, when more than 3 flights arrive in quick succession, as happens during the summer peak, it still results in passengers queuing into the corridor.

6.23 Border Force managers agreed that the expansion of the Hall was an improvement. However, no changes were made to the PCP desks or ePassport gates. Inspectors noted that the PCP desks looked dated and heavily worn. Border Force officers described the control as “dreadful” and “poor”. Also, the positioning of the PCP desks offered only limited visibility of the queuing passengers, restricting the ability of PCP officers to observe any safeguarding or challenging behaviours before passengers approached the control.

6.24 Meanwhile, the positioning of the Watch-house,¹⁸ at the back of the Hall behind a row of ePassport gates and 2 PCP desks, with no height advantage, meant it was useful only as an office. In practice, there was no vantage point that gave an unobstructed view of the entire Hall because of a section of wall, which the airport operator told inspectors could not be removed for structural reasons.

6.25 All of the PCP desks have IT terminals with access to Home Office systems, including the Warnings Index (WI). Inspectors observed that it was common for passengers who had cleared the control to wait for their travelling companions immediately behind the PCP, from where they were able to view whatever was displayed on the officer’s screen. Inspectors were told that Border Force had asked for privacy screens to be installed behind each desk, but that the airport operator had refused as this would make the route out of the Hall narrower which would present a health and safety risk in the event of an evacuation.

¹⁷ Passengers with limited mobility or other disabilities that would benefit from assistance in moving through the airport, and some VIP passengers.

¹⁸ The ‘Watch-house’ is the operational office containing the resources and equipment Border Force officers may require during their shift, including for example the IS81 log book. It acts as the operational base for the duty manager.

- 6.26** There is clear signage on entering the Hall indicating separate queues for EU and non-EU passengers. When they reach the front of the queue, passengers are directed to a particular PCP by a ‘Presenter’¹⁹ provided by the airline.
- 6.27** The PCPs are normally staffed by a combination of Border Force officers and Seasonal Workforce (SWF) staff.²⁰ The latter are mostly retired police officers, with some former Border Force officers. During the onsite phase of the inspection, inspectors observed between 2 and 4 SWF staff on duty at the PCPs at any one time.
- 6.28** Arriving passengers served with an IS81²¹ are initially required to take a seat, located between the queuing passengers and the PCPs. From there they are normally shown to an interview room for further examination by a fully-trained Border Force officer. At Glasgow, as elsewhere, it is normal practice for the officer who has issued the IS81 (assuming it was not a SWF) to carry out the further examination.

Edinburgh Airport layout

- 6.29** Edinburgh Airport has 2 International Arrivals areas. The second (IA2) was formally opened in 2016. By 2018, passenger volumes at Edinburgh had increased from 2 million to over 14 million, and at the time of the inspection the majority of passengers were processed in IA2. No flights land at IA1 on Tuesdays, Wednesdays or Thursdays and inspectors did not carry out any observations of IA1 in operation. However, IA1 has 10 PCP desks and 5 ePassport gates, along with one monitoring station.
- 6.30** IA2 has 9 PCP desks, plus 10 ePassport gates, along with 2 monitoring stations. The Watch-house is located behind the PCPs. It is raised and provides a good view of the queuing passengers. When a PCP desk is not in use it should be secured by a tensile barrier which is alarmed. However, during observations inspectors saw 2 un-manned PCP desks where the barrier had not been drawn across. Inspectors were also told that the alarms on the barriers were not always working.
- 6.31** While inspectors were onsite, Border Force also deployed an officer to the IA1 Watch-house, despite IA1 not being in use. Managers and staff told inspectors that the IA1 Watch-house had to be staffed at all times as it was not possible to secure IA1 from arriving passengers.
- 6.32** Edinburgh Airport was a pilot site for the new Border Crossing (BX) IT system, which is due to replace the WI. Officers were expected to use BX between the hours of 09:00 and 17:00 Mondays to Fridays, between which times IT support was available. The officers were largely positive about BX, aside from the training which had been delivered 2 years prior to the roll-out of the system and was therefore ineffective.

¹⁹ This is either one or more members of the carrier’s ground staff, or someone contracted by one or more carriers to provide this service. During observations, it was the quieter winter timetable which allowed for the airline staff to escort the passengers from their flight to the control. However, it was not clear how this system works during the busier summer timetable when more than one flight lands at the same time.

²⁰ SWF staff are a pool of individuals employed on casual contracts. In the case of Glasgow and Edinburgh, all are retired police officers or former-Home Office staff with relevant experience. Their contracts are managed by Border Force National Operations Headquarters (NOHQ), but their deployment is managed by local planning teams. They are used to make up any shortfalls. SWF staff are trained to carry out a restricted range of duties at the immigration controls, known as “pre-IS81 actions”. Passengers subject to further examination are issued with an IS81 form. SWF staff are able to issue an IS81 but the further examination must be carried out by an appropriately-trained Border Force officer.

²¹ Form IS81 is the written notice requiring a person to submit to further examination under schedule 2 of the Immigration Act 1971.

6.33 As at Glasgow, although “privacy filters” had been installed on the monitors, inspectors found they were able to read information displayed on the monitor, including BX screens, when standing behind the PCP desk. Despite signs instructing passengers not to wait behind the desks once they had cleared the control, and despite observing the duty manager directing passengers through to the Baggage Hall, some passengers still waited there for their travelling companions.

Staffing levels at Glasgow and Edinburgh Airports in December 2018

6.34 A major factor in how well any process works is whether it is properly staffed. As at December 2018, Border Force at Glasgow Airport had 74.03 full-time equivalent (FTE) staff in post and a budget that enabled it to employ up to 19 SWF staff.²² Border Force at Edinburgh Airport had 97.51 FTEs and a budget to employ 14 SWF staff.²³

Team-based working

6.35 Both Glasgow and Edinburgh Airports operate ‘Team-Based Working’ (TBW), where staff are organised into teams and a team is rostered together, with their manager, to cover a shift at the controls. The roster extends for 12 months. Officers saw this as helpful in planning ahead for leave and other commitments, but for those on ‘Annualised Hours Working’ (AHW) attendance could be altered with 7-days’ notice, or less if their employment terms included a ‘flexibility’ allowance.²⁴

Staffing Glasgow Airport

6.36 At the time of the inspection, there were 10 teams at Glasgow Airport, 7 of which cover the PCP, 2 cover customs activity, and one is a freight/international trade team. The latter has its own roster, but the PCP and Customs teams work to the same 7-week roster. Managing the roster appeared to be a time-consuming business. Inspectors were told that the Assistant Director and Border Force Senior Officers meet weekly to discuss staffing and to ensure that the roster is adjusted as required, while the Glasgow Operational Planning Unit (OPU)²⁵ reviews the roster daily. Inspectors were told that the roster has to be adjusted regularly to deal with significant seasonal variation in the traffic at Glasgow and with unplanned absences, due to sickness for example. Staffing shortfalls are normally filled by SWF staff, whose shifts are usually allocated a few weeks in advance.²⁶ The alternative is to require a permanent member of staff to change their shift to “balance the roster”.

6.37 Managers complained to inspectors about the TBW rostering system’s inflexibility. They said that it did not help them to respond in an agile way to changes in traffic during the year or to specific events, such as sporting or entertainment events hosted in the city. They suggested that a rostering system based on traffic flows would be preferable.

6.38 While inspectors were onsite, the numbers of staff on duty each day appeared sufficient for Border Force’s purposes. However, this was not a peak period for passenger traffic.

²² At the factual accuracy stage, Border Force clarified that Glasgow had a budget for up to 19 SWF in 2017-18, but the budget was for 11 in 2018-19.

²³ Each airport is its own command, but these commands include other locations/areas. Glasgow is “Scotland West” (from Stornoway to Prestwick, including the permanently staffed locations of Glasgow Airport and Prestwick). Edinburgh is “Scotland East” (from Unst in Shetland to Edinburgh Airport, including the permanently staffed ports of Lerwick, Inverness Airport, Aberdeen Airport and Edinburgh Airport).

²⁴ At the factual accuracy stage, Border Force stated that “95% of Glasgow staff are either on AHA (Annualised Hours Allowance) or AHW and all have a flexibility allowance.”

²⁵ A team of 2, responsible for constructing rosters, handling and recording changes and monitoring the rosters to ensure that the optimum number of staff are on duty to cover the mandated functions.

²⁶ SWF can be called in at short notice but are under no obligation to accept a shift.

Staffing Edinburgh Airport

- 6.39** At the time of the inspection, there were 5 teams at Edinburgh Airport, so the roster repeats every sixth week. Edinburgh experiences seasonal variations in traffic, although these are less marked than at Glasgow.
- 6.40** The Edinburgh OPU reviews the roster on a weekly basis and makes any necessary adjustments to ensure the required number of staff are on duty each day. Shortfalls are filled with SWF staff, whose shifts are allocated up to 8 weeks in advance. Where there are not enough SWF staff to do this, the OPU will alter the shift of a permanent member of staff.
- 6.41** Officers at Edinburgh told inspectors that recent rosters were “unwelcome”. There were a number of reasons for this, including being rostered for night shifts on consecutive days (4 in a row), and returning to an early duty after rostered days off, which reduced their time out of work. Staff said that these issues were created by the roster’s inflexibility, which did not help them or Border Force. In their opinion, TBW was unnecessary.
- 6.42** The Edinburgh staff were particularly unhappy that the proposed roster for the coming 12 months contained 77-night duties. They complained that they would not be paid the Annualised Hours Working (AHW) allowance for this frequency of duties. Managers had reassured them that, in practice, there would be fewer night duties during the year as the shifts would be shared out amongst the new recruits who were expected to arrive. The managers told inspectors that they were aware of these complaints and that this situation was under review.
- 6.43** Inspectors were also told of concerns that the rostering system was not effective. Operational managers and staff said that it “gets bums on seats but not the skills in the right place”. While inspectors were onsite Border Force appeared to have sufficient staff on duty each day, however this was not a peak period for passenger traffic.

COMPASS

- 6.44** At both airports the roster is created using a locally-developed system called “COMPASS”. This system compares historical passenger traffic, team skills sets, staff working patterns, available AHW hours, and other data to help the OPUs create a roster with the required numbers of staff. Managers said the system serves both airports well and that it was also in use at other locations within North region.
- 6.45** Nationally, Border Force uses a system called the “Dynamic Response Tool” (DRT). Inspectors were told by managers and staff at Glasgow and Edinburgh that the DRT system did not deliver a sufficiently intelligent outcome for them. However, they recognised they would have to start using DRT in time as COMPASS had not been maintained and they did not have staff capable of maintaining it.

Queue times

- 6.46** The only published performance standard for Border Force operations at ports of entry relates to queue times. This states that the “queue for the EEA control will not normally exceed 25 minutes” and that “all non-EEA passengers will be presented to a UK Border officer within 45 minutes of joining a passport queue”.

Queues at Glasgow Airport

- 6.47** Border Force categorises Glasgow as a “medium-sized” airport. As such, Border Force guidance sets out that it must, as a minimum, “take one queue measurement for every hour of the week that is possible to do so”, and that the aim is to measure at a regular time slot every hour. Inspectors were told at Glasgow that Border Force measures the queue whenever it considers it appropriate to do so, which is normally when the queue looks to be longer than 10 minutes.
- 6.48** At Glasgow, ‘queue monitoring cards’ are used to measure queue times. Inspectors did not see this process at work during their observations at the airport but it was explained to them. Passengers joining the end of the queue for the immigration control are handed a card by a Border Force officer. The officer handing out the cards writes the time on them. The passenger is instructed to hand the card to the Border Force officer on the PCP desk as soon as they reach it. The officer records the time the card is handed to them. The cards are collected by the Border Force Higher Officer managing the shift, who writes down the elapsed times. These are later recorded electronically.
- 6.49** Home Office data²⁷ for December 2018 showed that 133 queue measurements were taken for the EEA queue and 83 for the non-EEA queue. The results are at Figure 2.

Figure 2

| Recorded queue times at Glasgow Airport in December 2018 | | |
|--|-----------|---------------|
| | EEA queue | Non-EEA queue |
| Number of measurements | 133 | 83 |
| Mean queue time (minutes) | 10 | 16 |
| Maximum queue time (minutes) | 24 | 35 |
| % meeting SLA | 100% | 100% |

- 6.50** If it were following the guidance, as a 24/7 airport Glasgow would be taking 168 readings each week. The record for December, even allowing for the holiday period, indicates that far fewer readings were taken than the guidance specifies. However, Border Force managers and staff told inspectors that it was impractical to measure the queue every hour, especially when the passenger volumes were high, as there was little capacity to do so when officers were deployed to the PCPs.
- 6.51** Border Force managers at Glasgow Airport told inspectors that due to the relatively small numbers of non-EEA arrivals they work locally to a single SLA for all passengers of 25 minutes maximum. The recorded performance for December 2018 therefore fell short of the local agreement, although it was within the national SLA of 45 minutes for non-EEA arrivals.

27 Provided by the Home Office Performance Reporting and Analysis Unit.

Queues at Edinburgh Airport

- 6.52** Like Glasgow Airport, Edinburgh is categorised as a “medium-sized” airport and is therefore required to measure the queue “every hour of the week that it is possible to do so”. Again, like Glasgow, Edinburgh Airport operates 24/7.
- 6.53** Home Office queue measurement data for Edinburgh Airport for December 2018 is at Figure 3.

Figure 3

| Recorded queue times at Edinburgh Airport in December 2018 | | | | |
|--|--------------------------|---------|--------------------------|---------|
| | International Arrivals 1 | | International Arrivals 2 | |
| | EEA | Non-EEA | EEA | Non-EEA |
| Number of measurements | 62 | 56 | 260 | 234 |
| Mean queue time (minutes) | 8 | 12 | 9 | 17 |
| Maximum queue time (minutes) | 24 | 40 | 35 | 61 |
| % meeting SLA | 100% | 100% | 98.1% | 97.9% |

- 6.54** Although significantly more than at Glasgow, the number of measurements taken at Edinburgh Airport in December 2018 was still well short of what the Home Office guidance indicated it should be. Managers said that the lower number of measurements at IA1 was because the majority of international arrivals are processed at IA2 and said that from the end of October 2018 the numbers processed at IA1 had “dropped significantly”.
- 6.55** Managers at Edinburgh told inspectors they considered that queuing times of between 20 and 25 minutes indicated that the queues were being managed effectively, while less than 15 minutes indicated that resources were not being deployed to best effect. They explained that their staffing levels had not been increased in line with the increase in passenger numbers after the airport had expanded. Consequently, their priority was to “maintain the SLA” rather than minimise queue times, and to ensure there were sufficient staff for other work, such as immigration casework and customs work.

ePassport gates

- 6.56** The Home Office is committed to rolling out digital technology at the border to improve the flow of passengers at busy airports. In October 2018, announcing the planned extension of eligibility to use ePassport gates to travellers from Australia, Canada, Japan, New Zealand and the United States,²⁸ it described the benefits of ePassport gates as:

“a faster route through the border as they allow eligible passengers to be processed quickly and securely. All passengers are automatically checked against Border Force systems and watchlists. The technology also allows Border Force officers to focus on other priority work such as identifying potential victims of trafficking.”²⁹

28 In March 2019, it was announced that the extension would also include eligible passengers from Singapore and South Korea, and that it would take effect in June 2019 at which time passengers from the listed countries would be exempt from completing landing cards. In mid-May 2019, the UK media reported that landing cards were about to be scrapped for all nationalities within a matter of days. The “B5J(SSK) project” actually went live on 20 May 2019.

29 <https://www.gov.uk/government/news/epassport-gates-to-ease-travel-for-passengers-from-more-countries>

- 6.57** The Immigration Minister referred to the government’s wish “to encourage people who boost our economy through tourism and business to travel to the UK, while at the same time maintaining border security.” She spoke about “increasing the use of digital technology” as part of an “ambitious programme to improve the passenger experience and meet the challenge of increased passenger numbers”.
- 6.58** The ePassport gates use facial recognition technology to compare the passenger’s face to the digital image recorded in their passport. The system is monitored by Border Force officers and anyone rejected by the gates should be redirected to a PCP to have their passport checked.

Use of ePassport gates at Glasgow Airport

- 6.59** Data provided by the Home Office showed that, in December 2018, of a total of 109,200 arriving passengers 83,280 (76.3%) were eligible to use an ePassport gate. Roughly two-thirds (55,592) of eligible passengers did so. Of these, 2,920 (5.3%) were redirected to a PCP desk.
- 6.60** Managers told inspectors that ePassport gate usage was lower than it might have been due to a decision to disable the ePassport gates when processing certain “high-risk” flights. However, inspectors also observed that the signage for the ePassport gates was not as helpful as it could have been, not providing information on how to use the ePassport gates, such as removing glasses, hats and any other accessories, until the passenger reached the front of the ePassport gate queue. If this information were displayed earlier it might speed up the flow through the ePassport gates which, in turn, might encourage more eligible passengers to use them.
- 6.61** At Glasgow, a Border Force “Monitoring Officer” is situated at a desk next to the row of ePassport gates. The Monitoring Officer is able to see if a passenger using a gate has triggered a watchlist “hit”. The ePassport gates are designed to detect “tailgating”³⁰ and imposters, but the Monitoring Officer should act as a “second pair of eyes” for such breaches. However, the positioning of their desk at Glasgow does not give the Monitoring Officer clear line of sight of all of the ePassport gates.
- 6.62** Internal Home Office guidance³¹ states that it is mandatory for a Border Force “Roving Officer”³² to be deployed at all times “for terminals with 6 or more e-Passport gates”. As Glasgow has only 5 ePassport gates, Border Force does not routinely deploy a Roving Officer. However, inspectors were told that a Roving Officer is sometimes deployed for particular “targeted flights” where the ePassport gates are in use.

ePassport gates at Edinburgh Airport

- 6.63** IA1 at Edinburgh Airport has 5 ePassport gates. According to Home Office data, in December 2018, of 25,140 passengers who arrived at IA1, 18,791 (74.8%) were eligible to use the ePassport gates and 15,884 (84.5%) did so. Of the 15,884, a total of 1,015 (6.4%) were redirected to a PCP desk.
- 6.64** IA2 has 10 ePassport gates. Data for December 2018 shows that of the 195,690 passengers who arrived at IA2, 141,151 (72.1%) were eligible to use the ePassport gates. Of these, 114,144 (80.9%) passengers did so, of which 9,833 (8.6%) were redirected to a PCP desk.

30 Where 2 or more passengers seek to pass through an ePassport gate using one passport, or where a second passenger attempts to follow another passenger without having had their passport scanned.

31 <https://horizon.fc.os.gsi.gov.uk/file-wrapper/roving-officers>

32 Border Force guidance states that: “As a Roving officer, your core responsibility is to provide safeguarding functions, including discharging obligations in line with section 55 of the Borders, Citizenship and Immigration Act 2009 (welfare of children). You should also monitor behavioural indicators and body language of arriving passengers, in line with the Border Force operating mandate, to identify passengers of any age approaching the e-Passport gates who may merit further examination.”

- 6.65** At IA2, the Monitoring Officer sits in a room behind the controls at one end of the row of ePassport gates. The room has good height advantage, but the view of some ePassport gates is restricted.
- 6.66** Because IA2 has 10 ePassport gates, Border Force guidance requires the deployment of at least one Roving Officer. During observations, inspectors confirmed that one was deployed and saw the officer exercising the functions set out in the guidance. They also observed that the officer became involved in directing the flow of passengers into the queue and towards vacant gates, which could potentially distract from their core functions.

Expectation

Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

Border Force Operating Mandate

- 6.67** The Border Force Operating Mandate is an internal Home Office document that sets out the minimum actions and standards required at the border controls to “Deliver effective intervention in all cases of known threats; Maximise the detection of unknown threats; and, Facilitate border processes for legitimate travellers, goods and freight.” It covers border security checks for “People”, “Goods”, [redacted] and details when and how some cases become the responsibility of other government departments.
- 6.68** The Operating Mandate details the mandatory checks Border Force officers must complete for all individuals seeking entry to the UK, and those to be applied to specific cohorts, plus the further checks an officer might decide to apply on a case-by-case basis to direct their next steps.
- 6.69** The Operating Mandate was last updated on 13 January 2015. It is available to Border Force staff via the Home Office intranet. All staff operating the Border Force controls are expected to be familiar with its contents and to have completed a mandatory e-learning course. However, according to Border Force data for Edinburgh Airport it appeared that just over half of the staff there had actually completed the mandatory training.

Skills training

- 6.70** In 2019, Border Force amended its approach to skills training with the aim of delivering the core skills training all officers should receive over a shorter period than before. Previously, all new entrants to Border Force were supposed to receive skills training via 3 “Core Skills” modules: Core Skills 1 (CS1), which equipped officers to undertake immigration duties to the point of further examination; Core Skills 2 (CS2), which equipped them to undertake customs duties, including selecting and searching vehicles and persons; and Core Skills 3 (CS3), which equipped officers to undertake further examination for immigration purposes.

- 6.71** However, previous inspections had found that operational pressures at some airports had meant that staff who arrived having been trained in CS1 were having to wait for many months to be released for the other Core Skills modules.³³ This was hampering Border Force from achieving its vision of a “multi-functional” workforce, where everyone was capable of performing both immigration and customs functions, and was adversely affecting staff morale.
- 6.72** In October 2018, CS1 and CS3 were amalgamated into a 5-week programme, so that when new officers now arrived at their first port they would have been trained in and could carry out the full range of immigration functions, subject to a mentoring process arranged locally. Their induction training would also have covered a range of customs skills and knowledge, enabling officers to work on the customs controls on arrival, with additional customs modules available, if required, such as specialist training in intellectual property rights and freight searching.
- 6.73** Managers at Glasgow and Edinburgh told inspectors they welcomed the new induction training programme as it avoided the long gaps between training modules and they believed it would make embedding learning easier and quicker for new recruits.
- 6.74** However, the availability of experienced Operational Training Officers (OTOs) was an issue at both airports. OTOs are supposed to mentor new recruits for around 4 weeks, helping them to put their classroom training into practice. However, at Glasgow and at Edinburgh inspectors were told that there were not enough experienced officers who could act as OTOs to deal with the surge in recruitment as Border Force prepared for the UK’s exit from the EU.
- 6.75** Experienced staff at Glasgow and Edinburgh told inspectors that new recruits had arrived not having been trained on essential IT systems, specifically on the Case Information Database (CID) and the WI. The pace of recruitment and the large numbers of staff undertaking induction training had meant that additional accommodation for training had had to be found, but this did not have the IT infrastructure to provide trainees with ‘live’ access to CID and WI, so new recruits arrived at their allocated port still requiring this training, which put an extra burden on experienced staff.
- 6.76** At Glasgow and Edinburgh, as elsewhere, most ongoing and “refresher” training for Border Force officers is delivered via e-learning packages. Inspectors were told that there was a strong push for staff to complete mandatory (and some optional) e-learning courses during the winter months when passenger flows at both airports are lower. While pragmatic, this risks adding to the sense that e-learning is “a ‘tick box’ exercise”, with limited training value, which has been highlighted as a concern in previous inspections.³⁴

Safeguarding training

- 6.77** All Border Force staff are required to complete safeguarding training. This takes the form of an e-learning package and an additional online course on the UK’s National Referral Mechanism (NRM)³⁵, including a module specifically relevant to Border Force staff.³⁶

33 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/549240/ICIBI_inspection_Border_Force_operations_Manchester_Airport_April_2016.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695287/An_Inspection_of_Border_Force_Operations_at_Stansted_Airport.pdf

34 For example, ‘An inspection of the Home Office’s approach to the identification and safeguarding of vulnerable adults (February – May 2018)’: <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-approach-to-the-identification-and-safeguarding-of-vulnerable-adults>.

35 National Referral Mechanism.

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

36 Page 6 of the Modern Slavery (including human trafficking) guidance:

<https://horizon.fcso.gsi.gov.uk/file-wrapper/modern-slavery-including-human-trafficking-0>

6.78 Both Glasgow and Edinburgh Airports have dedicated safeguarding and modern slavery (SAMS) teams who have received additional training and work with the Border Force’s central safeguarding team to promote awareness of safeguarding.

Safeguarding at Glasgow

6.79 At the time of the inspection, Glasgow’s SAMS team comprised 12 staff (a mix of Border Force Officer, Higher Officer and Senior Officer grades), who had received 3 or 4 days of specialist training to support and progress safeguarding cases involving children and Potential Victims of Modern Slavery (PVoMS). Some other staff at Glasgow had received behavioural detection training: a one-hour classroom-based session developed by Border Force Learning and Development and delivered jointly with the Centre for the Protection of National Infrastructure.³⁷

6.80 According to the data provided to inspectors, Border Force at Glasgow Airport identified 121 potential safeguarding cases in 2018. This was half the 2017 figure (241). The reason for this reduction was unclear. In both years, Romanians made up the vast majority of these cases (81% in 2017 and 91% in 2018). Glasgow receives a large number of low costs flights from Eastern Europe, including from Romania. Border Force regards the latter as “high risk” from a safeguarding perspective.

6.81 Inspectors observed how staff managed a flight³⁸ from Bucharest. The decision was taken locally to disable the ePassport gates. This had the support of Border Force senior management and the airport operator. All passengers from the flight were directed to a PCP desk, all of which were open. The PCPs were staffed by a mixture of Border Force Officers and SWF staff. There were also 2 Behavioural Detection Officers (BDOs) in the queue to identify any PVoMS or passengers of interest before they reached the control.

6.82 At the PCP, passengers were questioned about the purpose of their visit, how long they were planning to stay in the UK, where they were staying, and whether they intended to work. The officers at the PCPs had access to official Home Office smartphones with a pre-loaded translator application. Nonetheless, inspectors observed officers having problems communicating and, in some cases, they looked to other passengers to translate for them, which is self-defeating in terms of identifying potential victims.

6.83 2 SAMS officers (a Higher Officer and a Senior Officer) were on hand and able to provide support to any of the PCP officers who needed it. Inspectors were told that for “high risk” flights SWF and all new officers are briefed in advance on their safeguarding responsibilities, and the SAMS team and the duty managers were confident that they would ask for support if they needed it.

³⁷ Centre for the Protection of National Infrastructure provides protective security advice to businesses and organisations across the national infrastructure <https://www.cpni.gov.uk/>

³⁸ Blue Air flight from Bucharest at 09:00 on 28 February 2019. There are 4 Blue Air arrivals from Bucharest a week: on Tuesdays, Thursdays, Fridays and Sundays.

- 6.84** Where a PCP officer was concerned³⁹ about the answers given during questioning, the passenger was issued with an IS81, told why the officer felt the need to conduct further enquiries and asked to take a seat, in the view of the control, until the flight had been processed. Passengers who displayed indicators of concern⁴⁰ but did not meet the threshold for refusal were given an information card with contact details of organisations such as TARA⁴¹ who offer support and guidance for those at risk of trafficking.
- 6.85** Officers carrying out further examinations used a safeguarding interview template produced by the local SAMS team, in addition to standard post-IS81 procedures. This meant they should be capable of determining whether a passenger was at risk of exploitation, regardless of their experience or extent of safeguarding training. The template included a statement for the officer to read to the passenger outlining the reasons for the line of questioning, ensuring consistency.
- 6.86** Inspectors observed an interview with a passenger who displayed signs of having been trafficked. The officer used the safeguarding checklist to focus their line of questioning.
- 6.87** Inspectors were told that, in 2018, Border Force had agreed with the Romanian Police for 2 Romanian police officers to be at Glasgow Airport to assist with particular “high risk” flights. SAMS officers found this collaboration extremely useful. It not only helped overcome any language problems, but also meant that the Romanian Police could offer support to any passenger identified as a PVoMS or otherwise vulnerable and refused admission and refer them to the appropriate authorities in Romania. It also improved the Romanian Police’s intelligence and ability to prevent further cases.
- 6.88** Inspectors were told that, in February 2019, the arrangement with the Romanian Police had been suspended. Staff believed that this was due to the uncertainty caused by Brexit, but the Glasgow SAMS team was hopeful that it would recommence at some point.

Safeguarding at Edinburgh

- 6.89** At the time of the inspection, the SAMS team at Edinburgh Airport comprised 16 staff (as at Glasgow, a mix of Border Force Officer, Higher Officer and Senior Officer grades). Team members had received the same training as their Glasgow counterparts.
- 6.90** Some of the records of safeguarding cases at Edinburgh lacked key details, such as the date of the encounter. This made analysis difficult. However, it appeared that Border Force had identified 70 potential safeguarding cases in 2017 and 47 in 2018. Managers told inspectors that the lower numbers compared to Glasgow reflected the different sort of flights that arrived at Edinburgh. These were generally more expensive routes, which were thought to be less attractive to traffickers and therefore assessed as lower risk in terms of PVoMS.
- 6.91** Senior management told inspectors that the safeguarding strategy for Edinburgh Airport was under review. Border Force later clarified that it was subject to an annual refresh to include lessons learned from the previous year. The review was in its infancy and inspectors were given no indication of when it would be completed.

39 For example, about a lack of funds, lack of knowledge of where they were going, or about a third party having bought their flight ticket.

40 These include indicators such as avoiding eye contact, excessive sweating, repetitive touching of the face, rubbing the back of the neck and submission.

41 Trafficking Awareness Raising Alliance <https://www.glasgow.gov.uk/TARA>

- 6.92** Meanwhile, managers at Edinburgh told inspectors that safeguarding was the responsibility of all Border Force officers and the majority of officers who spoke to inspectors said that they were comfortable with their safeguarding responsibilities. Some were concerned, however, that they did not have the opportunity to gain experience and to practise their skills as any safeguarding cases they identified were allocated to members of the SAMS team to progress.
- 6.93** The records indicated that trafficking leaflets were handed to anyone displaying indicators of vulnerability but not enough to be refused entry. However, inspectors did not observe this being done as no safeguarding cases were identified during the onsite visit.

Expectation

Decisions and actions are ‘right first time’

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

Record keeping and decision quality

- 6.94** Inspectors requested case reference numbers for all immigration (“port”) files and customs records created at Glasgow and at Edinburgh between 15 January 2018 and 15 January 2019. The request was for these to be broken down as follows:

For the immigration cases, by:

- a. Case type/arrival category
- b. Case outcome (granted entry, refused entry and unresolved cases). For unresolved cases, final conclusion in terms of Border Force responsibility of the case as at 18 January 2019
- c. Detention details (including but not limited to time held, vulnerability and safeguarding issues)
- d. Immigration bail details (including but not limited to time bailed, vulnerability and safeguarding issues)

For the customs cases, by:

- a. Case type (please include a glossary of case types)
- b. Case source (e.g. planned operation, spot check, individual intelligence)
- c. Case outcome (no action/seizure/detained goods/arrest/prosecution/handoff to other authority etc.)

- 6.95** From these inspectors selected 50 immigration files and 50 customs records from each airport to examine record keeping and decision quality and consistency at both airports. The 50 customs records were selected at random, but the immigration files were segmented, with 20 “refuse to enter” and 20 “grant leave to enter” cases after the passenger was required at the immigration controls to submit to further examination (including cases involving immigration bail and detention), and 10 cases that remained unresolved as at 18 January 2019.

6.96 Neither airport was able to provide all of the requested files and records. Some of the records that were provided as requested were recalled for operational reasons before inspectors could examine them. In total, 55 immigration records were examined (25 from Glasgow and 30 from Edinburgh), and 85 customs records (38 from Glasgow and 47 from Edinburgh).

Officer notebooks

6.97 Some officer notebooks were not provided because, inspectors were told, they were stored in the officer's personal locker and the officer was not on duty. While this practice is in line with Home Office guidance on the storage of notebooks as it is written, the guidance fails to recognise that when not in use notebooks need to be accessible as well as secure.⁴²

6.98 The notebook guidance was produced in response to the 2015 ICIBI 'Inspection of Border Force Operations at Heathrow Airport', all 6 recommendations from which were accepted.⁴³ Inspectors had found that some officers were taking notebooks home with them and recommended that the Home Office should: "Ensure all notebooks are stored on official premises and are easily retrievable." One of the stated aims was "to enable managers to undertake more effective assurance activity". Storing notebooks in personal lockers does not achieve this.

IS81 forms

6.99 Guidance for Border Force officers on the issuing of IS81 forms is contained in 'Examination powers and Home Office form IS81', version 4.0 of which was issued on 11 July 2018 and is available via the Home Office intranet.

6.100 The guidance states that "It is no longer necessary to place a copy of the completed IS81 on the port file", and from their examination of the samples of immigration files inspectors found that in most cases a copy of the IS81 had not been filed.

6.101 However, it also states:

"It is essential therefore that you complete the form correctly before you serve it on the passenger. It is the initial record setting out how and why a passenger has been detained and indicates to the passenger the legal powers you have exercised to do so. If you fail to complete the form correctly, this can result in compensation claims for unlawful detention. You must complete the IS81 log accurately and fully to avoid the Home Office losing a case in court because there is no evidence of initial detention."

6.102 Inspectors examined the IS81 booklets⁴⁴ at Glasgow and Edinburgh and saw that copy sheets no longer existed. Instead, once they had completed an IS81 form, some officers made a photocopy in the Watch-house before handing the original to the passenger and then filed the copy. However, the guidance required officers only to complete the IS81 log.

42 At the factual accuracy stage, Border Force noted that the guidance requires that "completed notebooks must be stored in a way that allows them to be identified and retrieved at short notice" and that "On occasions, notebooks are requested by managers or are required by a Procurator Fiscal as a production in a criminal case. Officers are emailed the request and produce them. In the event that a notebook is required immediately there is scope to arrange for a locker to be accessed by managers in the absence of the officer but in an appropriately witnessed manner."

43 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445666/home_office_response_to_ici_inspection_of_border_force_operations_heathrow.pdf

44 The IS81 booklet contains blank forms to be completed. The IS81 log is where officers record the details of any IS81s they have served, including passenger details, reason for serving.

Examination of immigration files

6.103 At Glasgow, examination of the immigration files found that:

- in 12 out of 25 cases where the passenger had been required to submit to further examination there was nothing on the file to indicate that an IS81 had been issued
- further examination interview records were consistently poor, for example in 8 out of 23 the passenger had not signed the interview record as they are required to do to confirm its accuracy⁴⁵
- there were 2 cases where the passenger was granted Immigration Bail⁴⁶ - one pending removal⁴⁷ and one pending an asylum claim – neither had a bail risk assessment on file
- 20 out of 25 passengers were placed in the holding room and in these 20 cases
 - 10 IS91R⁴⁸ forms recorded all of the relevant information regarding the reasons for detention
 - in only 4 cases was the section explaining and confirming bail rights completed such that inspectors could be confident the passenger had had their rights explained to them
 - in 6 cases there was no copy of the IS91R on the file
 - 3 IS91s⁴⁹ contained errors

6.104 At Edinburgh, examination of the immigration files found that:

- in 29 out of 30 cases the passenger had been required to submit to further examination
- in 4 of the 29 cases there was nothing on the file to indicate that an IS81 had been issued
- in 2 of the 29 cases the passenger had not signed the interview record
- in 18 cases the passenger was granted Immigration Bail, but in 10 of these there was no bail risk assessment on file
- 22 out of 30 passengers were placed in the holding room and in these 22 cases:
 - 14 IS91R forms recorded all of the relevant information regarding the reasons for detention
 - in 16 cases the section explaining and confirming the bail rights had been completed
 - in one case there was no copy of the IS91R on the file
 - 4 IS91s contained errors

Examination of customs records

6.105 The customs records examined by inspectors comprised copies of officer notebooks and forms recording commodity detections and seizure. At both airports, the notebook entries varied greatly in quality and completeness. Some contained details of the questions asked and the answers given, timings, and with blank spaces struck through as required by Home Office

45 In one of these cases the record showed that this was because the passenger had refused to sign when asked.

46 Immigration bail in schedule 10 of the Immigration Act 2016 commenced on 15 January 2018 and is an alternative to detention. It replaced the existing powers of temporary admission, temporary release, release on restrictions, all forms of Chief Immigration Officer and Immigration Judge bail.

47 The individual had since been removed.

48 The IS91R (Reasons for Detention) explains to a passenger the legal power under which they are being detained and the reasons for their detention. The IS91R also contains a section where bail rights are explained to the passenger.

49 The IS91 (Authority to detain) form is a legal document which authorises the detention of a person. Border Force has issued repeated 'Interim Operational Instructions' reminding staff of the importance of completing forms accurately, the most recent of which stated "Recent independent inspections of ports have identified occasions when form IS91 (Authority to detain) has not been completed to confirm medical condition, potential risks or vulnerabilities of passengers detained in Border Force accommodation."

guidance.⁵⁰ Others contained only a brief description of events, lacking key details and failing to explain the reasons for the actions taken.

6.106 At Glasgow, Border Force produced 38 officer notebooks for examination from the 50 requested. Of the 38:

- none contained any indication that they had been assured by a Border Force Higher Officer⁵¹
- in 17 of the 38 cases the record did not indicate why the passenger had been stopped
- none indicated that the passenger had been referred for a customs examination by a PCP officer
- in the 38 cases where goods were seized, the records indicated that officers were consistent in their approach and the seizure was lawful⁵²

6.107 At Edinburgh, Border Force produced 47 notebooks from the 50 requested. Of the 47:

- one had been assured by a Border Force Higher Officer (BFHO), however in this case the notes had been completed some 7 months after the events recorded and after the notebook had been requested by inspectors
- in 29 of the 47 cases the record did not indicate why the passenger had been stopped
- none indicated that the passenger had been referred for a customs examination by a PCP officer
- in the 41 cases where goods were seized, the records indicated that officers were consistent in their approach and the seizure was lawful⁵³

Safeguarding records

6.108 At the time of the inspection, all safeguarding cases at Glasgow were subject to 100% assurance checks, regardless of the outcome. Managers told inspectors that this was necessary due to the large number of new starters and to monitor how non-SAMS trained officers were handling safeguarding cases. Inspectors were told that where gaps in the files were identified, the officer was provided with feedback, which inspectors were able to verify during file sampling. The SAMS team was also made aware so that it could monitor any training needs.

6.109 Case file assurance entailed a check against the following list:

- “• The decision to subject to further examination has been justified on the file, including a copy of the IS81
- Evidence of PVOM indicators have been clearly minuted
- The file notes confirm that the decision taken to treat the individual as a PVOM (or the decision to stop treating them as a PVOM) was reasonable and in accordance with policy, guidance and legislation

⁵⁰ Home Office internal guidance entitled 'Notebooks', published 20 May 2016.

⁵¹ At the factual accuracy stage, Border Force stated that “There is no requirement to record assurance information in an officer’s notebook, this activity would normally be in the Higher Officer’s own records.”

⁵² In ‘Inspection of Border Force Operations at Heathrow Airport (June–October 2014)’, inspectors found that where a passenger attempted to bring more than their non-EU duty-free allowance of cigarettes into the UK officers were seizing the excess amount but permitting the passenger to retain their allowance. The law requires that the whole amount is seized. A re-inspection at Heathrow in 2016 found that an instruction had been issued by Border Force to reinforce a “zero tolerance” approach, but some officers believed they should be allowed to exercise discretion. From the Glasgow notebooks inspectors examined and from observations it was evident that officers were seizing the whole amount as required.

⁵³ Again, inspectors witnessed this during observations.

- That all appropriate checks, NRM referrals and Duty to Notify procedures have been processed in accordance with guidance
- All actions have been carried out and recorded in a timely manner
- The decision to detain has been justified on the file and the IS91RA⁵⁴ has been completed and placed on file
- Detention (IS81, IS81 DAP, IS91) has been authorised by the appropriate grade
- Detention has been reviewed and Temporary Admission arrangements made in a timely manner in line with policy, guidance and legislation
- The CID record has been raised correctly and this it clearly shows whether a decision was made to treat the individual as a PVOM or not
- A checklist has been fully completed and is on file, all relevant paperwork has been countersigned by the BFHO
- Contemporaneous interview notes have been completed in line with guidance”

6.110 Inspectors noted that the checklist was focused on PVoMS. SAMS officers told inspectors that they were alive to all types of safeguarding cases, such as female genital mutilation (FGM) and forced marriage, but while officers were trained to identify all types of cases, the types of passengers and flights that arrived at Glasgow Airport meant that the majority of their work and focus was on trafficking and PVoMS.

6.111 From the examination of the 25 Glasgow port files, inspectors were able to confirm that where safeguarding issues were identified the safeguarding checklist was used, and the safeguarding concerns and the outcome were noted. However, the IS81 does not have a field for recording whether an NRM referral was offered and it appeared that there was no standard way of recording this.

Expectation

Errors are identified, acknowledged and promptly ‘put right’

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

Quality assurance

Operational Assurance Directorate

6.112 Border Force’s Operational Assurance Directorate (OAD) is responsible for monitoring front-line functions through a second-line, risk-based assurance and testing regime. This includes carrying out “spot checks” at (air)ports, overseeing operationally-critical first-line assurance checks, and collating reports from (air)ports of breaches of the Operating Mandate.

⁵⁴ Detainee risk assessment.

First-line quality assurance

- 6.113** In October 2018, OAD ceased use of its ‘Assurance Scheme of Control’⁵⁵ and replaced it with ‘Assurance Expectations’.⁵⁶ The latter gave local management greater discretion to tailor first-line quality assurance checks according to their assessment of their particular risks. Areas considered compliant could be lightly monitored, where higher risk areas might require more regular checks.
- 6.114** This new assurance process had been in place at Glasgow and Edinburgh Airports since January 2019. Therefore, when inspectors visited in late February/early March 2019 it was too soon to tell how effective it was in terms of maintaining Operating Mandate compliance and the quality of officers’ work. However, managers at both airports spoke positively about the new approach. They found that assurance activities were taking up less time and were less of a burden on operational areas.
- 6.115** At Glasgow and at Edinburgh, managers had decided on 100% assurance checks of immigration files. This was in part because of the numbers of inexperienced or newly recruited staff.

Breaches of the Operating Mandate

- 6.116** The records for both Glasgow and Edinburgh Airports showed a small number of breaches where passengers had been able to bypass the controls where Border Force was at fault. Glasgow recorded the same number of breaches where a third party was at fault. However, at Edinburgh Airport the number of breaches where a third party was at fault was significantly higher - see Figure 4. In most cases, the latter were as a result of “misdirected” flights, although not all misdirected flights resulted in an Operating Mandate breach.

Figure 4

| Number of times when passengers were not processed according to the Operating Mandate between 1 April 2017 and 18 January 2019 | | |
|---|--------------------------|------------------------|
| | Edinburgh Airport | Glasgow Airport |
| Border Force at fault | 4 | 3 |
| Third Party at fault | 13 | 3 |
| Total | 17 | 6 |

Misdirected flights

- 6.117** Passengers arriving at Glasgow and Edinburgh Airports from outside the UK, excluding the Common Travel Area (CTA), must be directed to an international Arrivals Hall to pass through the immigration and customs controls. Domestic arrivals, and passengers travelling within the CTA, exit without passing through the controls. This process is managed by the carriers, ground handling agents and airport security staff.
- 6.118** In 2017-18, there was one misdirected flight at Glasgow and 9 at Edinburgh. Between 1 April 2018 and 18 January 2019, there were 5 at Glasgow and 8 at Edinburgh.

⁵⁵ A comprehensive list of assurance activities to be undertaken, names the grade who must undertake them, when or how often.

⁵⁶ In March 2018, the ICBI inspection report on Stansted Airport recommended that the Home Office should “relaunch” the assurance scheme “so that it is no longer regarded as a “tick-box exercise””. The Home Office accepted this recommendation.

- 6.119** The physical layout of the airport appeared to play a major part in these misdirections. Here, Glasgow had the advantage. The design of the terminal building made the segregation of international and domestic arrivals easier for the carriers and ground handling agents, with 2 ‘piers’ dedicated to international flight arrivals and 1 to domestic/CTA flights.
- 6.120** At Edinburgh Airport, the 2 Arrival Halls were used for both international and CTA flight arrivals, albeit one was not used for international arrivals on certain days. Depending on the gate to which an arriving aircraft has been directed, particular security doors were opened or closed by airline employees or security staff to direct the disembarking passengers towards the immigration controls.
- 6.121** Both Glasgow and Edinburgh have written guidance for operational managers and staff setting out the process for dealing with misdirected passengers. Inspectors found that the guidance in place at Glasgow lacked detail. It contained few specifics. There was no list of actions, no process flowchart, and no lists of key contacts. In contrast, the guidance in place at Edinburgh contained clear definitions, plans to follow for different types of incidents, details of whom to contact and when, a link to a flowchart, as well as a ‘Recovery Check List’.⁵⁷
- 6.122** The 8 misdirected flights at Edinburgh between 1 April 2018 and 18 January 2019 involved 90 passengers, 10 of whom were not “recovered”. In the same period, there were 5 misdirected flights at Glasgow, involving 164 passengers, 38 of whom were not recovered.

Figure 5

| Recoveries from misdirected flights at Edinburgh and Glasgow Airports Between 1 April 2018 and 18 January 2019 | | |
|---|--------------------------|------------------------|
| | Edinburgh Airport | Glasgow Airport |
| Number Recovered Fully | 4 | 0 |
| Number Recovered Partially | 1 | 2 |
| Number Not Recovered | 3 | 3 |
| Total | 8 | 5 |

⁵⁷ A quick reference guide containing the most important elements of the Recovery plan.

Complaints

6.123 In May 2019, inspectors asked Border Force for the numbers of complaints received about Border Force at Glasgow and Edinburgh Airports during 2017-18 and 2018-19. Figure 6 shows the monthly totals for service and minor misconduct complaints combined received at each airport. Border Force had not yet collated the monthly totals for February and March 2019.

Figure 6

| Complaints received about Border Force at Glasgow and Edinburgh Airports in 2017-18 and 2018-19 | | | | |
|--|----------------|-----------|------------------|-----------|
| | Glasgow | | Edinburgh | |
| | 2017-18 | 2018-19 | 2017-18 | 2018-19 |
| April | 4 | 5 | 13 | 3 |
| May | 3 | 4 | 14 | 1 |
| June | 5 | 5 | 11 | 3 |
| July | 5 | 8 | 29 | 3 |
| August | 9 | 6 | 11 | 2 |
| September | 2 | 14 | 18 | 13 |
| October | 5 | 7 | 7 | 10 |
| November | 4 | 5 | 2 | 5 |
| December | 4 | 3 | 3 | 0 |
| January | 2 | 3 | 8 | 2 |
| February | 0 | * | 3 | * |
| March | 2 | * | 1 | * |
| Total | 45 | 60 | 120 | 42 |

Expectation

Each immigration, asylum, nationality or customs function has a Home Office (Borders, Immigration and Citizenship System) ‘owner’

- The BICS ‘owner’ is accountable for
 - implementation of relevant policies and processes
 - performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
 - resourcing (including workforce planning and capability development, including knowledge and information management)
 - managing risks (including maintaining a Risk Register)
 - communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
 - effective monitoring and management of relevant contracted out services
 - stakeholder engagement (including customers, applicants, claimants and their representatives)

Border Force North Region

Management structures and span

6.124 Border Force is divided into 5 geographical regions: South East and Europe;⁵⁸ South; Heathrow; Central; and North. Each has a Regional Director who reports to the Chief Operating Officer and then to the Director General.

6.125 In terms of area, North region covers more than half of the UK, spanning the north of England (from Merseyside across to the Wash), North Wales, Scotland and Northern Ireland. The Home Office intranet (“Horizon”) notes that: “This poses challenges because of differing legislation and political issues among the devolved administrations.” It states that North region is “staffed by about 1,100 officers, who work in about 70 ports, including 16 international airports” and that “a significant part” of the region’s role is “to engage with a diverse range of stakeholders including port operators, government bodies, more than 20 constabularies, and public and private stakeholders.”

6.126 The Border Force Regional Director is normally based in Manchester, which has the largest concentration of Border Force North staff. Supporting the Director, there is a Deputy Director with responsibility for Scotland, Northern Ireland and the North East of England. Scotland is then subdivided into 2 areas, Scotland West and Scotland East, each managed by an Assistant Director. Glasgow Airport is in Scotland West. Edinburgh Airport is in Scotland East.

Border Force North resources

6.127 Subject to overall affordability, Border Force regions are allocated a budget for staff based on an analysis of the staffing requirements submitted annually by each region to a central Strategy, Planning and Operational Policy team (SPOP). The regional submissions are supposed to include any expected extra pressures, for example airport expansions. However, the process was described to inspectors as “money down, as opposed to requirements up” where “everyone gets less than they want or need”. The result is “never enough to get all the work done, but you do get more than the bare minimum”.

58 Includes Eurostar from Brussels and Paris to St Pancras International and the Eurotunnel from Coquelles to Cheriton.

6.128 According to the Border Force North Business Plan 2018-19, the regional budget for the business year was increased by 7.9% over the 2017-18 figure, from £44.09m to £47.56m. Regional Directors and their planning teams determine the allocations to particular ports and other functions based on their more detailed understanding of the operational needs of each. In 2018-19, Scotland East was allocated £6.93m and a headcount of 141, while Scotland West was allocated £3.99m and a headcount of 82.

Workforce planning

6.129 The SPOP told inspectors that the need for a longer-term (“5-year”) workforce strategy was recognised, but external factors, such as Brexit, had meant that it had had to work on a year-by-year basis. However, Border Force was developing a more strategic workforce planning model and the regions were feeding into this.

6.130 Meanwhile, at the regional level, the Director North Region chairs a Regional Resource Board, which meets every 2 months. This is attended by Deputy Directors and Assistant Directors from each of the commands. The Board looks at recruitment requirements, taking account of FTE staff numbers, turnover (“churn”), age demographic, and potential growth in passenger traffic. It also looks at expenditure against the budget and can agree to the use of any underspends to fund SWF staff to ensure “operational resilience”.

6.131 According to the SPOP, Border Force’s pool of SWF staff was currently larger than originally planned, but this was cost-effective in the short-term. However, operational managers pointed out that a heavy reliance on SWF staff created pressures for permanent officers as the former had only limited training and could not perform all of the same functions.

Resourcing priorities at Glasgow and Edinburgh Airports

6.132 The Border Force Operating Mandate requires that the PCP is sufficiently resourced at all times to be able to conduct the mandatory checks, while customs deployments to some lower priority areas of work are “based on an informed assessment of the resources available to conduct mandatory checks [at the PCP] and activity in relation to higher category targets and control strategy priorities.”

6.133 Consistent with the Operating Mandate, inspectors were told that at Glasgow the PCP had until recently taken precedence over the customs controls during peak periods. However, an overall uplift in staff over the last year, which was described as “part of Brexit planning”, had resulted in an increase in staff on the dedicated customs teams and a greater focus on customs work.

6.134 Inspectors were told that “until recently” Edinburgh had also followed the Operating Mandate by resourcing the PCP to carry out “full checks” and resourcing the customs controls on an intelligence-led and risk-assessed basis. But it had also looked to minimise the queues at the PCP. This had meant that customs work was sometimes “discontinued” and staff sent to the PCP. However, at the time of the inspection there was a new approach. Operational managers at Edinburgh were no longer expected to reduce PCP queue times below 20-25 minutes, but instead to manage their resources so other functions were also covered. As a result, Edinburgh was doing more customs work and had developed new specialist customs teams.

Cyclamen resourcing

6.135 [redacted].

6.136 [redacted].

6.137 [redacted].

Risk registers

6.138 Inspectors reviewed the May 2019 version of the separate risk registers for the Scotland West and Scotland East commands. While both followed the prescribed “Home Office Risk Register Template” the contents were materially different.

6.139 For Glasgow Airport, 4 risks were identified, each of them rated “Amber” overall, taking account of their likelihood and impact. The risks covered staffing levels, including an over-reliance on relatively inexperienced SWF staff, particular skills training gaps, and the availability of detention facilities and staff to supervise detainees. The register records the mitigations and contingency arrangements for each risk, with review dates. In 3 of the 4 cases, the risk “trend” is shown as reducing, the fourth is shown as stable. The register shows the “risk owner” as the Assistant Director.

6.140 The risk register covering Edinburgh Airport identified 2 risks. The first of these, rated “Red”, referred to staffing levels. The “cause” of the risk was the rate of growth of the airport and the mitigating actions noted that, along with plans to increase efficiency and prioritise the upskilling of new recruits, Edinburgh had had its case for extra resources accepted. As a result, the risk “trend” was shown as reducing. The Assistant Director was shown as the “risk owner”.

6.141 The second risk, rated “Black” and shown as stable, concerned “EU Exit Day One No Deal” which would have “significant impact on Border Force policy and activities; primarily within Customs but also to a lesser extent Immigration” and require significant planning to ensure legislative compliance and operational readiness. It noted that, as at 1 March 2019, a “Readiness Plan” for Scotland East was being drafted and would be subject to regional and strategic assurance, and meanwhile various leads had been identified. The risk was shown as owned by 2 of the Border Force Senior Officers.

6.142 From the spreadsheets provided to inspectors, it appeared that neither Scotland West nor Scotland East had completed an ‘Information Asset Risk Register’ (for which there was a separate tab).

Partnerships and collaborations

Airport operators

6.143 Glasgow Airport is owned and operated by AGS Airports Limited.⁵⁹ Edinburgh Airport is owned and operated by Global Infrastructure Partners.⁶⁰

6.144 At Glasgow, the operator described the relationship with Border Force as “good and healthy” although felt that Border Force “lacked commercial acumen”. The head of operations deals with the Border Force Assistant Director and senior management team regarding any issues or feedback. There are some “challenging conversations”, mostly about queueing times, where the operator is looking to keep to a maximum of 10 minutes. There is no formal or structured sharing of data, for example about queue times, use of ePassport gates, resource plans and strategies, and the operator thought this would be useful.

59 AGS Airports Limited own Glasgow, Aberdeen and Southampton Airports.

60 Global Infrastructure Partners are also investors in Gatwick and London City Airports.

6.145 At Edinburgh, the airport operator described their relationship with Border Force as “generally good”. The operator was happy with the level of service Border Force provided and recognised that the recent expansion of the airport had presented some challenges. There were still some unresolved issues, including regarding who would pay for elements of the expansion that were specific to Border Force and a lack of clarity about who was responsible for providing and maintaining Border Force accommodation. The operator suggested that there should be more input from Border Force centrally. Locally, there was a lot of communication, but the operator and Border Force were looking at establishing Single Points of Contact to ensure that messages and decisions did not become confused as a result.

Other airport workers

6.146 Edinburgh Airport domestic and international passengers share the same departure lounge. As inspectors have found elsewhere,⁶¹ this arrangement is open to abuse as domestic passengers may look to make duty or tax-free purchases to which they are not entitled. The risk is increased at Edinburgh as arriving domestic passengers are routed through the same departure lounge to the exit. Inspectors queried this arrangement and were told that it had been approved by the Department for Transport and Her Majesty’s Revenue and Customs (HMRC).

6.147 At Edinburgh, the risk is mitigated by the staff working in the retail outlets checking boarding passes to ensure that a passenger is entitled to make a duty or tax-free purchase. Inspectors were told by Border Force that voluntary reporting by retail staff had identified some attempted frauds, and they considered that this voluntary arrangement was working well. However, inspectors found no evidence of risk testing of this potential fraud.

⁶¹ See ‘An Inspection of Border Force Operations at Stansted Airport’, published 28 March 2018. <https://www.gov.uk/government/publications/an-inspection-of-border-force-operations-at-stansted-airport>

Law enforcement

- 6.148** At Glasgow and Edinburgh Airports, Border Force's primary law enforcement partners are Police Scotland, including the Border Policing Command. At Glasgow inspectors witnessed effective collaborative working between Border Force and Police Scotland and HMRC. At Edinburgh, the relationship was primarily with Police Scotland.
- 6.149** At Glasgow, Police Scotland and HMRC were present alongside Border Force when the flight from Bucharest landed. This enabled each agency to engage directly with any passengers of interest on arrival and also to share relevant information and intelligence. For example, where a passenger arrived claiming to have a job offer from a cleaning company, Border Force was able to check with Police Scotland if the company had an adverse criminal history, for example, if it was linked to reported brothels or labour exploitation. Where a passenger claimed to have a job to which they were returning HMRC was able to check that the correct taxes and contributions had been paid.
- 6.150** Inspectors observed a number of passengers who provided information at the PCP desk that was of no concern to the Border Force officer but was likely to be of interest to HMRC. In these instances, inspectors saw officers refer the passenger to HMRC colleagues. Where officers decided the passenger could be of interest to Police Scotland, the officer spoke directly with Police Scotland colleagues and referred the passenger to them if appropriate.

Mitie (Holding facilities)

- 6.151** At Glasgow, passengers requiring further examination are escorted by Border Force from the PCP to the airport's short-term holding facilities. The latter are managed by Mitie, a facilities management company which has the contract for the management of certain detention facilities and for escorting detainees to and from places of detention. Mitie staff at Glasgow check the passenger into detention once they receive a completed IS91 form from a Border Force officer.
- 6.152** The holding facilities at Glasgow Airport comprise 2 interview rooms and one holding room. They are easily accessed from the Arrivals Hall. At the time of the inspection, a second holding room was being built. The intention is to use this for any families that are detained. In the meantime, families were accommodated in the existing holding room, which had been adapted to make it more comfortable for children.⁶²
- 6.153** Funding for the expansion of the holding facilities came from both the airport operator, Glasgow Airport Limited, and Border Force.⁶³ Inspectors were told that it was, in part, in response to an earlier 2018 ICIBI inspection⁶⁴ which argued that there should be another holding room so that passengers could be separated where there was a risk that the trafficker and trafficking victim were detained at the same time, or where there were other tensions between detainees.
- 6.154** Nonetheless, "high risk" flights can overwhelm the holding facilities. Inspectors observed officers issue IS81s to 6 passengers from the Bucharest flight, of whom 4 were held for a second interview, each requiring an interview room with telephone facilities for an interpreter. Since there were only 2 interview rooms, 2 passengers had to wait while the other 2 were interviewed.

⁶² The holding room had toys and other items to make the room more child-friendly.

⁶³ Expansion cost £350,000. Inspectors were told that Border Force paid for 50% of the cost.

⁶⁴ <https://www.gov.uk/government/publications/a-re-inspection-of-border-forces-identification-and-treatment-of-potential-victims-of-modern-slavery>

6.155 Inspectors did not observe the holding facilities at Edinburgh Airport in use as no-one was detained while inspectors were onsite. The holding facilities are located at IA1. There are no holding facilities at IA2, despite the fact that IA2 receives the majority of international flights. This meant that any passengers detained at IA2 had to be escorted through the airport. Mitie was contracted to manage the holding facility from 12.00 to 00.00. Outside these hours, Border Force officers would have to stay with any passengers who had been detained until Mitie were available. Some Border Force officers said they were concerned about being reliant on Mitie in this way. However, inspectors found that there was a good working relationship between Mitie and Border Force staff on the ground.

Annex A

Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007.

Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on his behalf.

The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions. However, functions exercised at removal centres, short-term holding facilities and under escort arrangements are excepted insofar as these are subject to inspection by Her Majesty's Chief Inspector of Prisons or Her Majesty's Inspectors of Constabulary (and equivalents in Scotland and Northern Ireland).

The legislation directs the Independent Chief Inspector to consider and make recommendations about, in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum Act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on section 19D of the Race Relations Act 1976 (c. 74) (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to him in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which he has committed to do within 8 weeks of receipt, subject to both Houses of Parliament being in session. Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

Annex B

ICIBI 'Expectations'

Background and explanatory documents are easy to understand and use

(e.g. statements of intent (both ministerial and managerial), impact assessments, legislation, policies, guidance, instructions, strategies, business plans, intranet and GOV.UK pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

Decisions and actions are 'right first time'

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance

- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

Errors are identified, acknowledged and promptly ‘put right’

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

Each immigration, asylum, nationality or customs function has a Home Office (Borders, Immigration and Citizenship System) ‘owner’

- The BICS ‘owner’ is accountable for
 - implementation of relevant policies and processes
 - performance (informed by routine collection and analysis of Management Information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
 - resourcing (including workforce planning and capability development, including knowledge and information management)
 - managing risks (including maintaining a Risk Register)
 - communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
 - effective monitoring and management of relevant contracted out services
 - stakeholder engagement (including customers, applicants, claimants and their representatives)

Acknowledgements

We are grateful to the Home Office for the cooperation and assistance received during the course of this inspection, and appreciate the contributions from the Border Force officers and from external stakeholders.

Inspection Team

Lead Inspector: Hollie Savjani

Inspector: Heath Geary

Inspection Oversight: Caroline Parkes



978-1-5286-1420-7
CCS0619431914