



# An inspection of ePassport gates

(June 2020 – January 2021)

**David Neal**  
Independent Chief Inspector of  
Borders and Immigration



# **An inspection of ePassport gates**

**(June 2020 – January 2021)**



© Crown copyright 2022

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](https://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](https://www.gov.uk/official-documents)

This publication is also available at [www.gov.uk/ICIBI](https://www.gov.uk/ICIBI)

Any enquiries regarding this publication should be sent to us at

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

ISBN 978-1-5286-2838-9  
CCS0621775782 / E02688843 01/22

Printed on paper containing 75% recycled fibre content minimum.

Produced by the APS Group.

Printed in the UK by HH Associates Ltd 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](http://www.gov.uk/ICIBI)

**Email us:** [chiefinspector@icibi.gov.uk](mailto: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

1. Scope and purpose	4
2. Methodology	5
3. Summary of conclusions	6
4. Recommendations	10
5. Background	12
6. Inspection findings: Commercial arrangements	20
7. Inspection findings: Staffing at ePassport gates	29
8. Inspection findings: Gate expansion by passenger cohorts	38
9. Inspection findings: Identification of vulnerable passengers	49
10. Inspection findings: Measuring effectiveness	64
11. Inspection findings: External impacts	75
12. Inspection findings: Planning for the future border	81

# Foreword

ePassport gates have been used by Border Force to process passengers at UK airports and juxtaposed controls in France and Belgium since 2008. The gates enable Border Force to process large volumes of 'low risk' passengers more quickly and with fewer staff than would be possible via manned immigration control desks. This also makes them attractive to airport operators since queueing times are shorter for arriving passengers. Rising passenger numbers have driven the expansion of gates across UK ports and extensions to new cohorts of eligible passengers; the gates had processed over 260 million passengers by July 2020. However, further work needs to be undertaken to measure the impacts of the expansion to these additional cohorts.

The COVID-19 pandemic imposed limitations on the way that this inspection was conducted. Inspectors were unable to visit airports to observe the operation of the gates or the staff working on them. Inspectors conducted interviews and focus groups with airport staff via videoconferencing. Nonetheless, inspectors identified common themes and issues across the ports inspected, which are highlighted in this report.

Border Force has a duty to identify and safeguard vulnerable passengers. Charities and NGOs have expressed concerns about how effectively vulnerable passengers are identified at the gates due to reduced interactions with Border Force Officers. Officers' understanding of vulnerability is narrowly focused, and completion rates for mandatory training on vulnerability are low. Training for Border Force staff in how to perform their roles at the gates is limited. Implementation of the recommendations from Border Force's review of the role designed to identify vulnerable passengers at the gates (roving officers), and the other roles carried out at the gates, has been delayed and the opportunity to introduce the recommendations during the period of lower passenger volumes due to the COVID-19 pandemic was missed.

As with a number of previous inspections, the Home Office did not provide inspectors with complete copies of the current commercial contracts for the gate operation. Instead, it provided a link to a redacted version of the framework agreement for the provision and maintenance of the gates on the GOV.UK website, in which the pricing schedule details had been redacted. In addition, it did not provide details of the service level agreements (SLAs) or key performance indicators (KPIs) by which the Home Office monitors its supplier's performance in delivering the contract, meaning that inspectors were unable to evaluate how it is assured by the Home Office. My predecessor raised his concerns with the Home Office and with ministers about the department's refusal to share the details of commercial contracts, and I will continue to press the Home Office to provide all relevant information so that ICIBI can fulfil its statutory responsibilities.

Border Force uses a return on investment model to assess the case for installing gates at a port. It does not share full details of the model with port operators, prompting concerns from them about a lack of clarity and transparency. In some cases, port operators have financed the installation of gates themselves to demonstrate their commitment to using the latest technology to enhance the customer experience.



Additional issues with the Home Office's commercial arrangements arose following the withdrawal of airport 'hosts' – airport staff usually provided by airport operators to direct passengers to the correct immigration queues and provide guidance on how to use the gates. The COVID-19 pandemic saw port operators place hosts on furlough or suspend hosting services completely. Border Force staff had to manage the queues in the absence of hosting staff and, in one location, the gates were closed following concerns around untrained airport staff performing the role. Border Force's port operator agreements detail the responsibilities for hosting services, but staff highlighted their lack of effectiveness and the difficulty in enforcing them.

Manual logs used for recording faults and incidents at the gates are poorly maintained, with inconsistencies in the details recorded and the quality of completion across different ports. The value of these manual records to the Home Office is unclear, as poor record keeping means that identifying patterns and trends is difficult. However, the Home Office told inspectors that all faults and incidents at the gates are reported and recorded in a central system which covers the whole of the e-Passport gate estate and which the Home Office considers is accurate and effective.

Border Force is upgrading the gates operating platform which will enable it to connect to Border Crossing, its new watchlist system. A National Audit Office report in December 2020 highlighted issues with the roll out of Border Crossing and raised concerns about the ambitious scale and pace of its revised roll out plan following previous delays. It noted that the Home Office had made contingency arrangements in the event that Border Crossing did not meet its planned availability, noting that if it was not available there would be a risk of disruption at the border.

The COVID-19 pandemic has required Border Force to manage the health measures at the border, which are often introduced at short notice. Border Force has a difficult job to ensure the wellbeing of its staff while maintaining the integrity of the immigration control and verifying passenger locator forms (PLFs) and COVID-19 test results. The forms are not integrated with the gates system meaning that the gates have been turned off and each passenger must be manually checked, leading to long queues in the immigration halls, even at a time of significantly reduced passenger numbers.<sup>1</sup> Media reports have highlighted tensions between the Home Office's approach and the frustrations of airport operators, with reports that flights will have to be diverted to European cities or passengers held on planes as operators are not prepared to tolerate immigration queues that exceed several hours. Border Force and the Home Office will need to rapidly introduce measures to relieve pressures at the airports and enable the reopening of the gates as travel restrictions are lifted, in order to avoid considerable reputational damage.

This report was sent to the Home Secretary on 17 June 2021.

**David Neal**  
**Independent Chief Inspector of Borders and Immigration**

---

<sup>1</sup> In its factual accuracy response of June 2021, the Home Office stated, "All e-Passport gates should be switched over to Border Crossing by 31 October 2021 and this process has now started. Automated PLF checking also became integrated with the PCP Border Crossing (BX) front desk system on 14 May 2021 (ahead of the Green country travel list launch on 18 May 2021) in ports where BX has been enabled, and in ports where e-Passport gates have also been upgraded to BX."

# 1. Scope and purpose

**1.1** This inspection examined the efficiency and effectiveness of the Home Office ePassport gate operation (also referred to as 'e-gates' or 'gates'), focusing specifically on:

- the identification of vulnerable passengers at the gates
- the resources, training and data required and delivered to manage the gate operation
- stakeholder engagement
- the impact of the expansion of gates to B5JSSK<sup>2</sup> nationals
- using the knowledge gained from the current operation of the gates to plan for the future border

---

2 The 'Border Five' countries of Australia, Canada, New Zealand and the United States (the UK is the fifth), plus Japan, Singapore and South Korea.

## 2. Methodology

### 2.1 Inspectors:

- reviewed open source information relevant to ePassport gates, including ICIBI's reports: 'A re-inspection of Border Force's identification and treatment of Potential Victims of Modern Slavery',<sup>3</sup> published in March 2018, 'An Inspection of Border Force Operations at Stansted Airport',<sup>4</sup> published in March 2018 and 'An inspection of Border Force operations at Glasgow and Edinburgh airports',<sup>5</sup> published in October 2019
- on 10 August 2020, published a 'call for evidence' on the ICIBI website inviting contributions from anyone with knowledge or experience of the Home Office's use of the gates
- in July 2020, held video conference calls with Home Office units in London, Croydon, Stansted Airport and Heathrow Airport, and with the gate supplier Vision-Box, non-governmental organisations (NGOs) and the Independent Anti-Slavery Commissioner (IASC), as part of familiarisation
- in August 2020, visited Border Force operations at Terminal 2, Heathrow Airport, as part of familiarisation
- analysed the documentary evidence and data provided by the Home Office in response to inspectors' preliminary and formal evidence requests
- between November 2020 and January 2021, interviewed and held focus groups (via Skype) with Home Office managers and staff from Assistant Officer to Senior Civil Servant at Heathrow Airport, Luton Airport, Stansted Airport, Manchester Airport, Glasgow Airport and Croydon
- on 22 January 2021, presented the emerging findings to Home Office senior management
- this inspection was conducted during the COVID-19 pandemic and as the UK prepared to leave the EU at the end of 2020. As such, the inspection process was adapted to take account of travel restrictions and the additional pressures facing operational and policy staff. Inspectors were unable to conduct familiarisation visits, except for a brief visit to Heathrow Terminal 2 in August 2020, and were therefore unable to observe the ePassport gates operation in any detail. Inspectors were also unable to hold onsite interviews or focus groups which were conducted over Skype instead, often with fewer staff than would normally be the case. Acknowledging the pressure that staff were under, deadlines for the return of evidence requests were extended, often by several weeks, to provide the Home Office with sufficient time to respond fully

---

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

4 <https://www.gov.uk/government/publications/an-inspection-of-border-force-operations-at-stansted-airport>

5 <https://www.gov.uk/government/publications/an-inspection-of-border-force-operations-at-glasgow-and-edinburgh-airports>

### 3. Summary of conclusions

- 3.1** ePassport gates were first introduced at UK airports in 2008. According to the Home Office, they had been used by over 260 million passengers by July 2020. In March 2021, the Home Office said there were 263 gates in operation across 23 UK locations and at the juxtaposed controls in Brussels and Paris. They are seen by the Home Office as an efficient tool to process large volumes of low-risk passengers through the immigration control. For similar reasons, they are also popular with port operators.
- 3.2** In 2013, the Home Office awarded a single-supplier framework contract to Vision-Box, a multinational technology company headquartered in Portugal. Since 2013 to date, 33 contract arrangements were let in support of the ePassport gates installation programme, which will cover the gates to 2023-24. Inspectors were not provided with unredacted copies of the commercial contracts or details of the means by which the Home Office measures the performance of the supplier.
- 3.3** The Home Office uses a return on investment model to assess the case for installing gates at a port. The full details of the model are not shared with port operators, some of whom raised concerns about a lack of clarity regarding these investment decisions. In a number of instances, port operators have taken the decision to finance the installation of additional gates themselves, believing that the gates demonstrate that airports are using the latest technology to enhance the customer experience. According to the Home Office, 7 port operators had funded the installation of 50 gates, “amounting to £8m worth of investment” as of April 2020.
- 3.4** There is little central training for Border Force Officers (BFOs) working at the gates. Currently, BFOs are required to complete bi-annual vulnerability e-learning, but a new ‘Protecting the Vulnerable’ training package is due to be rolled out in 2021. Increasing use has been made of behavioural detection (BD) training for roving officers (ROs). Staff and managers are enthusiastic about the course, but limited availability has prevented its widescale uptake. The gates supplier is required to deliver one training session per deployment per annum at a site. Prior to an installation going live, training is arranged with local Border Force leads in conjunction with Digital Passenger Services and delivered by Vision-Box.
- 3.5** ‘E-passport gates: standard operating procedures’ sets out the minimum staffing requirement for the gates to operate; “the gates must not be opened or allowed to accept passengers without both a monitoring officer (MO) and referrals officer present.” The MO is responsible for supervising all stages of the gate’s operation, from opening through to disabling them at the end of the scheduled operating hours. The role of MO rotates as part of a fixed point system. Border Force guidance recommends that an MO does not operate the gates for more than 30 minutes of continuous, uninterrupted passenger processing. For operational reasons, this may be longer but should not exceed one hour. In practice, Border Force staff told inspectors that this guidance was rarely adhered to and fixed points of up to 2 or 3 hours were not uncommon.
- 3.6** At ports with more than 5 gates, a roving officer (RO) must be deployed. The primary objective of the RO is to prevent trafficking and provide safeguarding assurances by heightening security

around the gates. ROs now have a broader border security role, leaving stakeholders to question whether they are sufficiently resourced to identify child safeguarding concerns and other vulnerable passengers.

- 3.7** Hosts, or ‘presenters’, are airport staff usually provided by the airport operator to direct passengers to the correct queues and provide guidance on how to use the gates. The host usually stands just in front of the gates where they are able to marshal the queue and communicate directly with passengers. Declining passenger numbers due to the COVID-19 pandemic has led port operators to place hosts on furlough or to suspend hosting services completely. Border Force staff have described this as leading to “mayhem” and Border Force should work to formalise the commercial arrangements regarding the provision of hosts, and their responsibilities in the immigration hall, with port operators.
- 3.8** In April 2017, use of the gates was expanded to all British, EEA and Swiss children aged between 12 and 17, if accompanied by an adult. Evaluation of this expansion found that ports were able to successfully stream large volumes of eligible children through the gates. In relation to child safeguarding, the Home Office concluded from a review of the original trial that the number of EEA children who are identified as at risk of trafficking, modern slavery, female genital mutilation, forced marriage and domestic servitude is low compared to overall passenger numbers, making it a “challenging” risk for Border Force to manage.
- 3.9** Use of the gates was further extended to visitors and entry clearance holders from Australia, Canada, Japan, New Zealand, Singapore, South Korea, and the United States of America (known as the B5JSSK nationals) on 20 April 2019.<sup>6</sup> Prior to April 2019, these nationals were already eligible to use e-Passport gates if they were a member of the Registered Traveller Scheme. The extension of use is seen as a success. With increased usage of the gates, ports with the highest volumes of passengers in this cohort have been able to reduce queuing times and increase efficiency at the border.
- 3.10** Although the B5JSSK nationals are seen by Border Force as presenting a low risk to non-compliance with immigration controls, an interim draft Home Office benefits realisation report produced in April 2020 listed a number of consequences of the expansion to this cohort as:
- a drop in Premium Service income
  - increased NHS debt
  - decreased CT (counter-terrorism) referrals
  - a drop in B5JSSK refusals
  - a lack of tracking of criminality in the B5JSSK cohort by Immigration Enforcement (IE)
  - a perception of a reduction in service to UK nationals using the gates

Further work is required by the Home Office to fully understand the causes and impacts of these consequences and the Home Office told inspectors that further benefits realisation work would take place once the COVID-19 impacts on international travel had reduced, to fully understand the causes and impacts of these consequences.

- 3.11** Concerns have been raised by stakeholders about the Home Office’s ability to identify vulnerable passengers at the gates. Stakeholders told inspectors that the gates make it harder to identify vulnerable passengers. From interviews and focus groups, it appeared that some BF managers and frontline officers shared this belief. Inspectors spoke to officers at Glasgow

---

6 <http://www.legislation.gov.uk/ukxi/2019/298/note/made>

Airport who had had success in identifying potential victims of modern slavery by closing the gates and ensuring that all passengers on certain “high risk” flights were examined by a BFO.

- 3.12** Border Force has sought to mitigate these risks by increasing the deployment of roving officers (ROs) and improving the quality and frequency of the vulnerability training that BFOs receive. A Behavioural Detection eLearning package was issued to frontline officers on 6 May 2021. Border Force Operational Policy also stated that phase 2 of the review of the role of the RO would recommence later in the financial year 2021 to 2022.
- 3.13** Border Force data does not differentiate between vulnerable passengers identified at the gates or at the primary control point (PCP). Furthermore, Border Force only records the identification of potential victims of modern slavery. There is no centrally held record of the identification of other categories of vulnerability. This makes it impossible to evaluate the role of ROs, MOs or hosts when it comes to safeguarding children, for example.
- 3.14** The UK’s departure from the EU has created a potential new cohort of illegal workers who will continue to enjoy visa-free movement to the UK. The UK has also lost access to EU criminality data systems, creating a risk that high-harm individuals could enter the UK via the gates or the PCP. However, while the UK lost access to Schengen Information System (SIS II) data from the watchlist, this was replaced by Interpol Notices which help to identify persons involved in criminality. There is also guidance on Horizon and instructions were circulated which advised staff of these changes. This guidance was updated at the same time as SIS II guidance was removed from Horizon as the EU transition period ended on 31 December 2020.
- 3.15** Manual gate incident logs used for recording faults and incidents at the gates are poorly maintained. There are inconsistencies across different ports in terms of the details recorded and quality of completion. It was unclear to inspectors how useful these manual records are to the Home Office or how they use them to identify patterns or trends with gate faults. The Home Office should introduce a consistent and standardised method for reporting faults and incidents at the gates, including details of fault and incident outcomes and ensuring that trends can be identified, categorised, and analysed. However, the Home Office told inspectors that all faults and incidents at the e-Passport gates are reported to DDaT (Digital Data and Technology) Enterprise services via their IT Helpdesk and are recorded and referenced in a central system which covers the whole of the e-Passport gate estate and which the Home Office considers is accurate and effective.
- 3.16** The Home Office records of control breach incidents when a passenger is allowed through a gate in error. Data provided by the Home Office indicates that control breaches are rare. The majority were caused by gate failure, although some were attributed to actions by passengers, BFOs, and airport hosts.
- 3.17** The COVID-19 pandemic has caused serious logistical issues for Border Force, with the closure of airport terminals and staff working in ‘bubbles’ to help minimise the impact of infection rates on staffing levels. The gates have to be cleaned after every flight and maintaining social distancing for passengers has been difficult in the immigration halls. Passengers who do not take off their face masks when using the gates have contributed to increased delays at some airports and there have been reports of passengers wearing masks being granted entry by the gates. However, the Home Office also told inspectors that they had not identified any passengers granted entry in error. This will need to be monitored by Border Force as it seeks to introduce a new facial recognition algorithm as part of the upgrade to the gates, as new facial

recognition algorithms are increasingly accurate and can reach a threshold based on the eye area alone which lets passengers through accordingly.

- 3.18** Border Force staff have to enforce health measures at the border, for which updates to guidance are often provided at short notice. The need to check passenger compliance with the measures necessitated the closure of the gates at some ports, resulting in long passenger queues and adverse media attention. The Immigration Service Union reported that verbal abuse of Border Force staff at ports had significantly increased since the health measures at the border were implemented and called for increased safety measures for staff working at the ports.
- 3.19** Digital Passenger Services (DPS) is overseeing a programme to upgrade the operating platform for the gates with a new management platform which runs on Windows 10, enabling it to connect to Border Crossing.<sup>7</sup> In March 2021, the Home Office told inspectors that roll out had not yet started, with work concentrating on the early adopter sites and that it was “a complex project which is subject to change to accommodate ministerial direction on health measures at the border so may still be revised”.<sup>8</sup>
- 3.20** The National Audit Office (NAO) published a report on the Digital Services at the Border (DSaB) programme in December 2020, highlighting issues with the roll out of Border Crossing.<sup>9</sup> The report noted that the intention of the Home Office was to reintroduce Border Crossing in November 2020, “with 24/7 service availability from April 2021 and national roll out by mid-June 2021 to all 56 ports covered by the programme.” It stated that “this far exceeds the scale and pace of roll out it achieved with its previous version of Border Crossing” and highlighted that the Home Office had “made contingency arrangements for once Warnings Index is decommissioned in case Border Crossing cannot meet its planned 99.93% availability. If Border Crossing were not available there would be a risk of disruption at the border.”<sup>10</sup>

---

7 The new back end system that will replace the Warnings Index, which provides the current passenger watchlist.

8 In its factual accuracy response, the Home Office stated that the work commenced “as planned and should complete by 31 October 2021”.

9 <https://www.nao.org.uk/wp-content/uploads/2020/12/Digital-Services-at-the-Border.pdf>:

“Technical issues affected the availability of the Department’s Border Crossing version 0.4 system when it was live from September 2019, causing progressively increased downtime (both planned and unplanned). In December 2019, six out of the seven pilot ports were using it to check fewer than 20% of passengers. In March 2020 the programme board suspended Border Crossing to improve system stability and support. In total it had been available for 54% (84) of the days it was in live operation. As part of the reset, the Department increased the number of technical staff working on the programme. The Department is confident that it now has the technical capability and resources it needs to deliver the programme (paragraphs 2.12 and 2.14).”

10 In its factual accuracy response, the Home Office stated that “Border Crossing roll out remained on target to be working at 56 port primary check points by 30 June 2021.”

## 4. Recommendations

### The Home Office should:

#### **Training, guidance and communications**

- 4.1** Deliver the Protecting the Vulnerable (PTV) training to all public-facing Border Force staff during 2021.
- 4.2** Deliver the classroom-based Behavioural Detection (BD) training to all roving officers.
- 4.3** Review how guidance is shared with staff working at the gates, including the format and timeliness of the guidance and the time provided for staff to read it.
- 4.4** Review communications with staff on the level of risk that B5JSSK nationals present to the immigration control.

#### **Roles, responsibilities and resourcing**

- 4.5** Ensure that staff performing the monitoring officer role do so for a maximum of one hour at a time, in line with guidance.
- 4.6** Agree new commercial arrangements for the provision of hosts with port operators.
- 4.7** Ensure that hosts are always present when the gates are in operation and that they prioritise the identification of minors to ensure that only those children aged 12-17, who are accompanied by a responsible adult, use the gates.
- 4.8** Ensure that where more than 10 gates are in operation, there are sufficient resources available to allow at least 2 roving officers to be deployed.

#### **Record-keeping, data collection and evaluation**

- 4.9** Implement standardised methods for recording complaints at the gates, ensuring that trends can be identified, categorised, and analysed.
- 4.10** Complete, and implement the findings from, the evaluation of approaches to queue management, including standardisation and publication of revised Service Level Agreements.
- 4.11** Implement a system to record details when passengers are stopped due to safeguarding concerns, including the circumstances in which vulnerable passengers are identified, the role of the officer who identified the passenger and whether the passenger was eligible to use, or was trying to use, the gates.
- 4.12** Ensure that the reasons for the consequences of the B5JSSK expansion are evaluated and acted upon where necessary.



- 4.13** Implement standardised methods for reporting faults and incidents at the gates, including details of fault and incident outcomes and ensuring that trends can be identified, categorised, and analysed.
- 4.14** Regularly review and publish the Public Sector Equality Duty responsibilities and the Equality Impact Assessments relating to the operation of the gates, in accordance with best practice.

#### **Planning**

- 4.15** Develop plans to measure the impact of the UK's withdrawal from the EU on illegal working by, and modern enslavement of, EU nationals, including the use of the gates by EU nationals and a means of identifying those gate users at increased risk of exploitation.

## 5. Background

### ePassport gates

- 5.1** ePassport gates were first introduced at UK airports in 2008. According to the Home Office, they had been used by over 260 million passengers by July 2020.
- 5.2** The Border Force Operating Mandate states that an ePassport gate is an “Automated gate which uses facial recognition technology to compare the user’s live photo image to the image held in the biometric chip contained in their passport.” The ePassport gates ‘system’ is described on the Home Office intranet as “a tool to help Border Force maintain effective control over increasing numbers of travellers.”
- 5.3** The gates work by reading the biodata page in the passport and opening the chip in the passport to read the data it contains. They also undertake a range of document and person security checks and undertake a facial recognition check and provide verification. In addition, they undertake checks against government watchlists and perform ‘liveness’ (anti-spoofing) checks.<sup>11</sup> Guidance for Border Force staff states, “Automatic watchlist checks are part of the process. The gates will open if the passenger and their document pass a number of tests. If the passenger fails any of the tests, they will not be allowed through and must be processed in the normal way.”
- 5.4** As of April 2021, ePassport gates can be used by holders of an ePassport who are:
- UK/EU/EEA/Swiss nationals and Australian, Canadian, Japanese, New Zealand, Singaporean, South Korean, and American nationals (referred to as ‘B5JSSK’ nationals)
  - aged 12+ (12-17 years must be accompanied by an adult)
  - members of the Registered Traveller Scheme (a paid for service that allows some nationalities to process through the UK border more quickly, subject to certain criteria)<sup>12</sup>

### Legislation

- 5.5** ePassport gates were originally designed for use by British, EEA and Swiss citizens over the age of 18. UK nationals and Irish citizens do not require leave to enter the UK. The gates confirm their nationality and no further control is needed. Before the UK’s departure from the EU on 31 December 2020, the gates were used to confirm the nationality of EEA nationals for free movement. Now EEA nationals enter through the gates on the same basis as B5JSSK nationals, i.e. those with leave (because they have an Entry Clearance (EC) or hold EU Settled Status (EUSS) and are permitted entry on that basis.) For EEA nationals coming to the UK as visitors, leave to enter as a visitor is granted automatically on passing through the gate.

---

<sup>11</sup> Spoofing is described as ‘seeking to trick the facial recognition system’.

<sup>12</sup> [Registered Traveller: faster entry through the UK border - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/registered-traveller-faster-entry-through-the-uk-border)

**5.6** 'The Immigration (Leave to Enter and Remain) (Amendment) Order 2010'<sup>13</sup> enables passengers of other (unspecified) nationalities to use the gates.<sup>14</sup> Article 8A (5) lists the 7 categories eligible to use the gates:

- "a. a general visitor;
- b. a business visitor;
- c. an academic visitor;
- d. a sports visitor;
- e. an entertainer visitor;
- f. a person seeking leave to enter as a visitor for private medical treatment; and
- g. a person seeking leave to enter as the parent of a child at school in the United Kingdom."

## Registered Traveller Scheme

**5.7** The Registered Traveller Scheme (RTS) allows nationals of 33 countries to use the gates to enter the UK. Nationals of the designated countries,<sup>15</sup> who are aged 18 or over and who either have a UK visa or entry clearance or have visited the UK at least 4 times in the last 24 months, may apply to be registered. RTS members must pay a fee of £70 per year to use the gates. The RTS came into force on 17 November 2014.

## 12-17 year olds

**5.8** ePassport gates became available for use by all British, EEA and Swiss national children aged between 12 and 17, if accompanied by an adult, on 10 April 2017. Prior to full adoption, early testing was carried out at Stansted Airport in January 2016. The trial was subsequently extended and expanded.

## B5JSSK nationals

**5.9** Since April 2019, visitors and entry clearance holders from Australia, Canada, Japan, New Zealand, Singapore, South Korea, and the United States of America (referred to as B5JSSK nationals) are also able to use the gates, provided they are 18 years of age or over, or accompanied by an adult if aged 12-17.

---

<sup>13</sup> <http://www.legislation.gov.uk/ukdsi/2010/9780111491058>

<sup>14</sup> As stated in the explanatory note, the 2010 Order:

"enables an immigration officer to authorise a person in advance to enter the United Kingdom through an automated gate. Such authorisation will relate to a particular category of person under the immigration rules, as set out in article 8A. Where such a person passes through an automated gate in accordance with the authorisation, the person will automatically be given leave to enter for six months (subject to the conditions set out in article 8A). Where such leave is given, no notice of the leave is given to the person and the 2000 Order is amended in article 3 to reflect this.

Article 5 amends article 11 to provide that where any question arises under the Immigration Acts as to whether a person has leave to enter the United Kingdom and the person alleges that the person has such leave by virtue of passing through an automated gate under article 8A, the onus shall be on the person to show the manner and date of entry into the United Kingdom."

<sup>15</sup> Botswana, Namibia, Seychelles, Brunei, Hong Kong, Macao, Malaysia, Maldives, Taiwan, Andorra, Monaco, Vatican City, Israel, Bahamas, Mexico, Saint Vincent and the Grenadines, Nauru, Papua New Guinea, Samoa, Tonga, Argentina, Belize, Brazil, Chile, Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, Panama, Paraguay, Trinidad and Tobago and Uruguay.

- 5.10** These changes required the introduction of the ‘Immigration (Leave to Enter and Remain) (Amendment) Order 2019’,<sup>16</sup> allowing the 7 nationalities to use the gates. The statutory instrument was laid before Parliament on 3 December 2018.<sup>17</sup>

## The UK’s departure from the EU

- 5.11** The Leave to Enter and Remain Order was amended in December 2020 to allow EEA nationals to continue to use the gates on the same basis. On 30 December 2020, the Immigration Minister also signed a Ministerial Arrangement under the Equality Act 2010 which enabled EEA nationals to continue to use the gates following the UK’s departure from the EU, “if, where required, they are in possession of an entry clearance or leave to enter the UK”.

## Timeline for introduction and roll out

- 5.12** The first generation of gates was installed in late 2008 at Manchester and Stansted Airports. Following a pilot period, additional gates were installed at 8 more airports by the summer of 2009. A second-generation improved version of the gates was installed at all Heathrow terminals by July 2011. Gates are installed in ‘banks’ of gates which can be made up of any configuration accommodating up to a maximum of 15 gates in one bank.
- 5.13** By 2013, the gates installed between 2008-2011 had “come to the end of their serviceable life”. In addition to replacing the existing gates, Border Force saw a “strategic opportunity to exploit their success and extend the benefits by expanding the estate whilst upgrading the existing ePassport gates”.
- 5.14** The third generation gates were first rolled out at Gatwick South, with 15 gates going live on 31 October 2013. This initial installation was deemed a success by the Home Office and the further roll out of the third generation gates began in 2014 and ended in 2016, delivering 165 gates. The majority were funded by the Home Office but 15 were funded by port operators.
- 5.15** In April 2016, the Home Office Portfolio Investment Committee (PIC) approved Border Force Comprehensive Spending Review (CSR) funding of £27.3 million to deliver a programme to install up to 70 gates, which would increase existing capacity at larger ports and introduce gates at new sites. It also set out the delivery of enhancement work to the gates to increase the number of passengers eligible (who were not previously eligible) to use the gates, with targets of 65% in 2016-17, 70% in 2017-18, and 80% in 2018-21.

---

<sup>16</sup> <https://www.legislation.gov.uk/uksi/2019/298/contents/made>

<sup>17</sup> Article 8B contains the changes to legislation as follows:

“(1) A person to whom this article applies may obtain leave to enter the United Kingdom by passing through an automated gate.

(2) This article applies to a person who—

(a) is a national of Australia, Canada, Japan, New Zealand, Singapore, South Korea or the United States of America;

(b) is travelling on a passport issued by one of the countries listed in sub-paragraph (a);

(c) is aged 12 or above; and

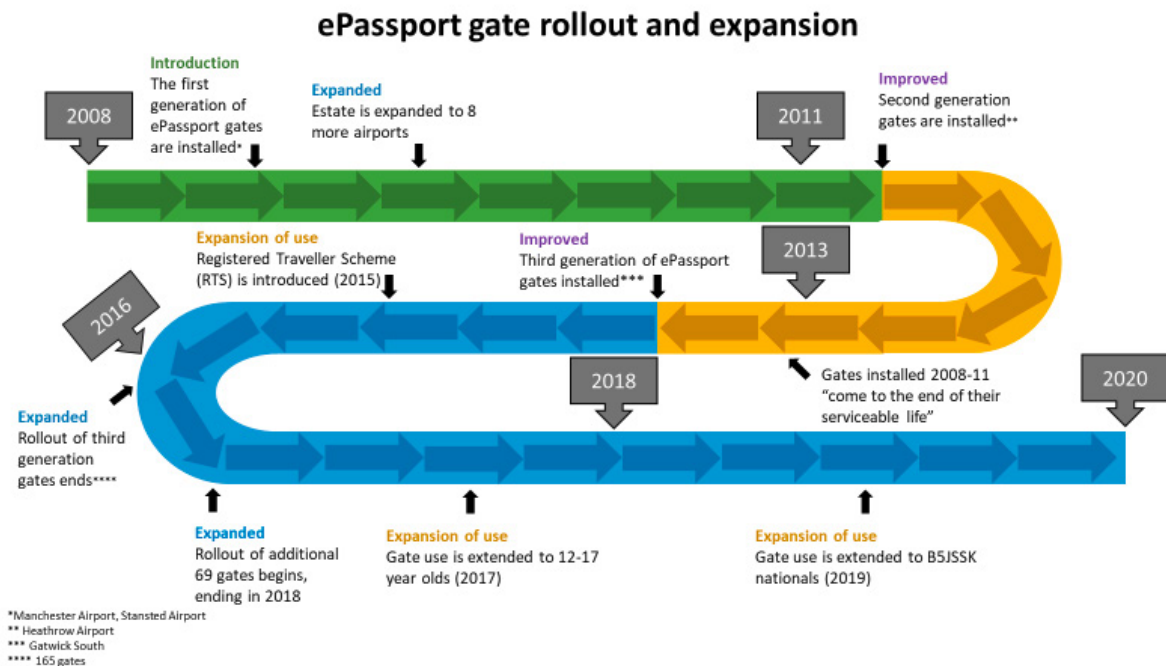
(d) is seeking to enter the United Kingdom as a visitor (standard) under Appendix V to the immigration rules.

(3) Leave under paragraph (1) is given for a period of six months.

(4) Such leave is subject to conditions prohibiting employment and recourse to public funds (within the meaning of the immigration rules).”

- 5.16** Between April 2016 and April 2018, 69 gates were installed at ports in the UK as well as at the juxtaposed controls in Brussels and Paris.<sup>18</sup> These locations were selected based on requirements for security at the border and return on investment (ROI) modelling which was undertaken to select the most appropriate locations.<sup>19</sup> The ROI model is covered in more detail in Chapter 6.

**Figure 1:** ePassport gate roll out and expansion timeline



## ePassport gate locations and numbers

- 5.17** In its submission to the Home Office Portfolio Investment Committee (PIC) in 2016, Border Force (BF) stated that air passenger numbers were projected to grow year on year by 5%, while BF was expected to "reduce its workforce by 11% by 2020." At that time, ports were "already experiencing queue pressures with daily SLA breaches resulting from peaks of passenger arrivals." The submission stated that "without more gates the pressure will continue and worsen as traveller numbers grow, damaging BF reputation and relations with port operators, undermining traveller experience for UK citizens and visitors, and affecting the Government prosperity agenda".
- 5.18** In August 2020, the Home Office told inspectors that it had 268 gates in operation across 23 locations. In February 2021, the Home Office told inspectors that there were 263 gates in the estate, reflecting a temporary reduction due to the gates in Manchester Terminal 2 being taken out of service. This was described as "a temporary change as Manchester Airport will open a brand new Terminal 2 in the spring that will have at least 10 eGates operational from day 1."

18 "The UK operates border controls in France and Belgium. This allows Border Force officers to check passengers and freight destined for the UK before they begin their journey. These 'juxtaposed controls' are in place at Calais and Dunkirk ports, at the Eurotunnel terminal at Coquelles and in Paris Gare du Nord, Lille, Calais-Frethun and Brussels Midi stations for Eurostar passengers. The arrangement is reciprocal, with French officers completing Schengen entry checks in the UK. These arrangements are underpinned by bilateral treaties." From: <https://homeofficemedia.blog.gov.uk/2017/07/11/fact-sheet-the-uks-juxtaposed-border-controls/>

19 "Return on investment is a simple ratio of the gain from an investment relative to the amount invested." From: <https://investinganswers.com/dictionary/r/return-investment-roi>

Figure 2

## Passport gates in operation by location, February 2021

	Terminal	Number of gates
1	Birmingham T1	15
2	Bristol	10
3	Brussels	5
4	Cardiff	5
5	East Midlands	5
6	Edinburgh (East)	10
7	Edinburgh (West)	5
8	Glasgow	5
9	London City	10
10	London Gatwick North	25
11	London Gatwick South	25
12	London Heathrow T2	15
13	London Heathrow T3	15
14	London Heathrow T4	10
15	London Heathrow T5	24
16	London Heathrow T5 Transfers	5
17	London Stansted	30
18	Luton	15
19	Manchester T1	10
20	Manchester T2	0
21	Manchester T3	9
22	Newcastle	5
23	Paris	5
	<b>Total</b>	<b>263</b>

## ePassport gates policy and management structure

**5.19** The ICIBI's 'expectations' of asylum, immigration, nationality and customs functions state that each immigration, nationality or customs function should have a Home Office (Borders, Immigration and Citizenship System) 'owner'.<sup>20</sup> As they are part of the border technology infrastructure, the gates are the responsibility of the Senior Director of Systems and Change in Border Force. The Border Force Digital Passenger Services team (DPS), part of the BF Border Systems Programme, is the Home Office 'owner' of the ePassport gates and oversees the projects to upgrade technology and roll out new or additional gates.

<sup>20</sup> <https://www.gov.uk/government/publications/icibi-expectations-for-inspection>

- 5.20** Day-to-day management of the gates operation is the responsibility of Home Office Digital Data and Technology (DDaT), under the Head of Borders Portfolio & Technology Services. The handover process from installation to normal operations is described as follows:
- “Upon completion of each of the ePassport Gates installations and following ‘Early Life Support’ ELS, the gates and their associated risks, issues and opportunities are handed over [by DPS] to the Enterprise Services Team within the Digital, Data & Technology Directorate of the Home Office (DDaT). Once accepted into Enterprise Services, the ePassport Gates’ service management, supplied by Vision Box, is managed by them for the life of the service contract which for each installation is for 5 + 1 years.”
- 5.21** A senior civil servant (SCS) from the Future Border and Immigration System Team/Unit, part of the Borders, Immigration, Citizenship System, Policy and International group (BICS PI), is responsible for ePassport gates policy, with a responsible Grade 6 in the Border Security, Visa and Identity Policy team.
- 5.22** Describing the split of responsibilities, the BICS policy lead told inspectors that BF Operational Policy are responsible for ensuring that guidance in relation to the gates is accurate and up to date, while BICSPI “say who can use the gates.” The Home Office also told inspectors that technical operator guidance is owned by HO Digital Data and Technology. An example given of how this worked in practice was the expansion of gate use to B5JSSK nationals, when a joint team from both areas was created to oversee policy and operations.
- 5.23** Within Border Force, inspectors were told that guidance on the operation of the gates comes under the immigration lead in Operational Policy, but “there is not a specific policy team that deals solely with ePassport Gates”, even though “any policy elements related to the operation of ePassport (e.g. BF operational guidance) would sit with Border Force (BF) Operational Policy”. Staff responsible for policy told inspectors that because the remit of Border Force is so broad they “don’t have a dedicated team which focuses on the gates all the time. When a piece of work is required there is a prioritisation process.”
- 5.24** The Home Office told inspectors:
- “The ePassport gates are managed operationally within the normal management structures at ports. There are nominated managers at each location with responsibility for the ePassport gate operation, together with teams of ‘superusers’. Superusers will usually be an officer grade [Border Force Officer]. Operational decisions on deploying resources to the ePassport gates are made by operational managers [usually a Higher Officer] on a day to day basis in the same way as other resourcing matters.”
- 5.25** In terms of issuing instructions for the operation of the gates, one Border Force Regional Director told inspectors that they were “almost entirely centrally mandated” and that “deployment [of guidance] is dealt with at a local level.” There was a feedback process to the Border Force Operational Assurance Directorate (OAD) if an issue had been identified that might affect operations nationally.

## ePassport gates upgrade programme

- 5.26** Since the creation of the original gate solution, Vision-Box have developed a standardised Windows 10 gates management platform called the Orchestra Services Platform (OSP). The gates system also needs to connect to Border Crossing, the replacement for the Warnings

Index, which will provide a new watchlist and enable the Future Border Immigration System (FBIS) to deliver key policy changes.

- 5.27** The Digital Passenger Services Programme manages delivery of the Programme to upgrade the ePassport gates with DDaT. Border Crossing is delivered by DSAB which is a major programme in the Border Systems and Change Directorate. Like the DPS programme, it also has DDaT support to deliver the technical elements of the roll out. DDaT manages the current Warnings Index (WI) contract with Fujitsu and will oversee the management of the Border Crossing (BX) System that will replace it, with the infrastructure created being subsumed by DDaT as a live service operation.
- 5.28** DPS holds a monthly programme board chaired by the Senior Director of Systems and Change. The DPS project team reports on issues such as spend against the budget, the number of gates installed and other expansion issues. Technical changes are also approved through the DPS Board, while ‘patches’ and upgrades are managed through the DDaT Board. The DDaT Board is also chaired by the Senior Director of Systems and Change.

## Updates on previous ICIBI recommendations

- 5.29** Previous ICIBI inspections have looked at different elements of the ePassport gates operation and have made recommendations about staffing and training of those officers working alongside the gates.
- 5.30** ‘An Inspection of Border Force’s Identification and Treatment of Potential Victims of Modern Slavery’<sup>21</sup> and ‘A re-inspection of Border Force’s identification and treatment of Potential Victims of Modern Slavery’<sup>22</sup> raised issues in recommendation 9 relating to:
- “1. the deployment of more than one Roving Officer when the volume of arrivals and/or configuration of the arrivals hall means that one person cannot do the job effectively;
  2. the provision of behavioural indicator detection training to more frontline staff;
  3. effective real-time communications between Roving Officers, Monitoring Officers and the staffed referral desk;
  4. greater use of targeted closures of ePassport gates (for high risk flights) at airports where this is practicable.”
- 5.31** The re-inspection in November 2017 found that:

“Allowing eligible 12 to 17-year olds to use the ePassport gates when accompanied by an adult is now “business as usual”. Border Force has produced guidance defining the Roving Officer role and specifying the “essential” training required. While some officers remain concerned about the practicalities of performing the role, reasonably so based on inspectors’ observations, Recommendation 9 can be closed.”

The issues identified in recommendation 9 are still pertinent. They have not been consistently addressed at all gate locations and Border Force should continue to drive progress in these areas.

---

<sup>21</sup> <https://www.gov.uk/government/publications/inspection-report-on-potential-victims-of-modern-slavery-february-2017>

<sup>22</sup> <https://www.gov.uk/government/publications/a-re-inspection-of-border-forces-identification-and-treatment-of-potential-victims-of-modern-slavery>



- 5.32** Guidance issued to ROs recommends that more than one RO should be deployed where more than 10 gates are in operation. BF staff told inspectors that this is often not the case. Senior BF managers accept that this extra deployment is possible without too much impact on resources, with one Regional Director telling inspectors, “It’s realistic for there to be 2 ROs on at any one time but it would have to be made a priority. Generally speaking, it is possible to have 2 without there being an impact elsewhere in terms of staffing.”
- 5.33** ‘An Inspection of Border Force Operations at Stansted Airport’<sup>23</sup> made 2 recommendations about the roving officers and monitoring officers:
- “5. Ensure that sufficient “Roving Officers” are deployed at Stansted to discharge fully Border Force’s responsibilities for safeguarding passengers, both adults and children, in particular when 15 or more of the e-Passport gates are in use.
  - 6. Review the guidance to “Monitoring Officers” regarding their safeguarding responsibilities and produce workable advice on how they are to satisfy themselves that a child or young person, or vulnerable adult, does not require them to take safeguarding action. This recommendation is not restricted to Stansted.”
- 5.34** ICIBI announced its intention to inspect ePassport gates in June 2020. In September 2020, inspectors wrote to the Home Office seeking an update on recommendation 6. The Home Office responded:
- “Border Force reviewed the monitoring officer role as part of a wider review of roving officer activity. Whilst the roving officer work is still ongoing, a guidance document has been prepared specifically for monitoring officers and was shared with relevant staff on 19th August 2020. Recommendation closed 10/08/2020”.
- 5.35** This is a reference to the ‘ePassport gates - monitoring officer - best practice guide’ which was issued to staff following the commencement of this inspection. It is designed for MOs at ports with 5 gates or fewer (Stansted has 30 gates). Inspectors did not consider this reached the requirement set out in the recommendation and therefore do not consider it to be closed.
- 5.36** ROs at Stansted informed inspectors that 2 ROs are always deployed when 20 or more gates are in operation. Local guidance at Stansted states that a second RO is routinely deployed, although the document does say that this is only necessary when at least 25 or more gates are in operation.

---

<sup>23</sup> <https://www.gov.uk/government/publications/an-inspection-of-border-force-operations-at-stansted-airport>

## 6. Inspection findings: Commercial arrangements

- 6.1** In 2013 the Home Office awarded a single-supplier framework contract to Vision-Box, described on the latter's website as "a multinational technology company headquartered in Lisbon, Portugal, dedicated to improving the quality, convenience, efficiency and security in government services, travel, border control and all smart facilities."<sup>24</sup> The contract would provide separate 5 year goods and services contracts, with an option to extend for another 12 months. "The goods call-off Framework ended in June 2017, but installations continued to be delivered under that contract into 2020 through paperwork signed within the timeframe of the framework."
- 6.2** Since 2013 to date, 33 contracts were let in support of the gates installation programme, which will cover the gates to around 2023-24. These arrangements have different expiry dates given the staggered installation programme, meaning that those in place for some of the early adopter sites have expired and have been extended under a single tender action.<sup>25</sup> Vision-Box told inspectors that some installations had been extended for 3 years and that they had been contracted by the Home Office until 2026-27.
- 6.3** In July 2020, inspectors asked the Home Office for copies of the current commercial contracts for the provision and maintenance of the gates, broken down by supplier and location. The Home Office provided a link to a redacted version of the framework agreement on the GOV.UK website. The pricing schedule details had been redacted and the call-off terms and conditions were noted as being "contained in a separate document."<sup>26</sup> In addition, it did not include details of the service level agreements (SLAs) or key performance indicators (KPIs) by which the Home Office would monitor Vision-Box's performance in delivering the contract. Details of the servicing contracts awarded to Vision-Box can be found on the Contracts Finder facility on GOV.UK,<sup>27</sup> but the links do not provide the full details and only contain information on the location, value and contract start and end dates. As a result, inspectors were unable to inspect how the supplier's performance is assessed under the contract.
- 6.4** A Senior Executive Officer (SEO) in Home Office Commercial Directorate is dedicated to managing the contract. Vision-Box told inspectors that there were several meetings a week between them and the Home Office to monitor and review service performance, as well as monthly commercial meetings and risk management reviews. Issues arising and updates are provided to the Senior Civil Servant in Digital Passenger Services (DPS) and the DPS Board.

### Vision-Box performance

- 6.5** Although inspectors were not provided with copies of the Service Level Agreements (SLAs) or Key Performance Indicators (KPIs) agreed between Vision-Box and the Home Office to measure

---

<sup>24</sup> <https://www.vision-box.com/>

<sup>25</sup> Described in HO guidance as 'the process of inviting only one supplier to quote or bid. STAs must be avoided wherever possible.'

<sup>26</sup> <https://data.gov.uk/data/contracts-finder-archive/download/1373966/343b495d-ef50-459d-b276-5ec50b1e0dbf>

<sup>27</sup> For example: [Servicing of 10 x e-Gates at Luton Airport - Contracts Finder](#)

the performance of Vision-Box in delivering the contract, they were told that there are 2 sets of KPIs. One measures system availability against a target of 98% and the other is based on call out times to rectify gate failures. Inspectors were told that if a bank of gates failed, Vision-Box would have to repair them within 2 hours.

- 6.6** The Home Office told inspectors that the framework and call-off contracts “include requirements for the provision of Management Information on the performance of eGate hardware/software and the supplier’s performance in meeting Service Level Agreements stipulated in the contracts” which are “reviewed with the suppliers during commercial contract management meetings.”
- 6.7** Home Office commercial staff told inspectors that the Home Office had “perceptual issues with Vision-Box to begin with”, but this turned out to be due to a Home Office error which meant that Vision-Box’s performance was measured against the KPIs of another supplier and not against those in the contract with Vision-Box. They also said that “communication could be better on both sides”. While the Home Office was “not great at setting out what they want and change their mind quite a lot”, Vision-Box did not always “respond in a clear way” which could be an issue as the Home Office would not “spend money if they don’t understand what they are spending it on.”
- 6.8** Inspectors heard that there was a general view in the Home Office that Vision-Box were “very focused on product development” and very good at rolling out new products, but they were “not great at supporting their products”, particularly when it came to second- and third-line support. (Inspectors did not have sight of the servicing contracts to verify their requirements.) There were also concerns that they “spread themselves thinly” and that they did not “have the resources to properly implement upgrades”.
- 6.9** Vision-Box told inspectors that their service was “generally above the contractual SLAs and KPIs and where there are incidents that fall outside the SLA service improvement plans are put in place to reduce the likelihood of future breaches”. They noted that in 2019, “the number of travellers transiting the existing e-Passport Gates...exceeded 58 million travellers” while meeting the ePassport gate service level agreement 99.34% of the time, as verified by data provided by the Home Office. Vision-Box also said they had been informed “anecdotally” that “the UK could not run the border without our service”.<sup>28</sup>
- 6.10** The Home Office provided information on gate incidents which stated that “the target Time to Repair for a Service Failure is partly determined by the Severity Level of that Service Failure”. Inspectors noted that there were more incidents at Severity Level 1, when all ePassport gates in one installation were unavailable, than Severity Level 2, when  $\geq 50\%$  and  $< 100\%$  of ePassport gates were not available in a location. No incidents at Severity Level 4 were recorded.

---

<sup>28</sup> In its factual accuracy response, the Home Office stated, “Vision Box provide one technology solution at the border which makes up a small part of the overall system.”

Figure 3

ePassport gates service failure severity levels		
Severity Level	e-Passport Gates Service Failure	3-month total for all ePassport gate locations (October – December 2019)
1	All e-Passport Gates not available in a single e-Passport Gate installation	23
2	>=50% and <100% of e-Passport Gates not available in a single e-Passport Gate installation	17
3	> 0% and <50% of e-Passport Gates not available in a single e-Passport Gate installation	1,044
4	All e-Passport Gates still operationally functioning in a single e-Passport Gate installation but with issues	N/A

- 6.11** Vision-Box told inspectors that they believed the Home Office would recognise their “flexibility (in project, service and commercial aspects) and tenacity in project delivery”. However, when asked about which areas they thought the Home Office would highlight for improvement in their delivery of the gate contracts, they focused on service improvements and releases rather than the day to day delivery of the contract.

## Return on investment model

- 6.12** Documents provided by the Home Office explained the return on investment (ROI) modelling used to secure funding for the installation of 69 gates between 2016 and 2018. They show that the ROI was “estimated as the cumulative benefit of the new gates over their five-year lifetime. The model worked by calculating the efficiency savings, in terms of staff time (but not staff savings), which could be made if eGates were to be deployed balanced by the costs of installing and maintaining the gates.”
- 6.13** The documents explain that if the number of gate transactions matches or exceeds the number forecast then the predicted ROI (£s) from the model should be realised. However, if the transactions are less than forecast then there will be a shortfall in the expected ROI.
- 6.14** The ROI for the 2016 ePassport Gate Expansion Programme assumed gate usage of around 105.9 million passengers. The actual number of transactions recorded for the period was ~3.5% below forecast, at 102.3 million. The Home Office stated that the difference between forecast and actual could vary by port due to a number of factors.<sup>29</sup>
- 6.15** The Home Office stated that if passenger uptake continued to be lower than forecast, the ROI “will not be realised over the assumed 5-year lifetime of the gates.” However, while the assumed lifespan of the gates was 5 years, on which the ROI modelling and benefits were based, it was subsequently established that the gates were robust enough (with regular servicing and maintenance) to continue working with an extended technical life expectancy of

29. Listed as: “ePassport Gate installation occurring later than anticipated; Port growth expectations being lower or higher than assumed; and the port’s flow arrangements which might change to increase passenger flow through different areas.”

around 7 to 8 years. The “extension to the technical life expectancy means that benefits are most likely to exceed those detailed in the business case and return on investment modelling.” However, the Home Office also noted that the long-term effects of the COVID-19 pandemic “will have an impact on the ROI” given the reduced passenger numbers during the pandemic.

## Staff savings

- 6.16** Home Office documents record the benefits of the ePassport Gates Installation Programme in terms of cost effectiveness and increased staff utilisation, but not in terms of staff savings. The original business case for the installation of what were then called Automated Clearance Services (ACS), which dates from 2009, looked to extend the trials that had been carried out at Manchester and Stansted airports to 8 additional locations.<sup>30</sup> It described the benefits of the roll out of the ACS gates then as:
- “• Organisational flex at the frontline; targeted resource to risk and improved use of workforce skill set
  - Delivery of commitments to the public and key stakeholders;
  - A response to the pressures introduced by the economic climate. The recession has impact everywhere and UKBA is no exception. We can spend to save over the long term.”
- 6.17** The benefits of the 2016 ePassport gate installation programme are listed as increased security, cost effectiveness to ports and Border Force, increased staff utilisation and absorbing passenger volume growth.
- 6.18** The submission to the Home Office Portfolio Investment Committee in 2016 for the expansion of the ePassport gate estate stated that “Border Force (BF) faces the challenge of managing 5% year on year passenger growth while reducing operational resourcing by 11% by 2020. The only realistic option is the automation of routine border transactions, and ePassport gates are the only proven way to do this as part of an integrated border control.” The document did not explain how operational resourcing would be reduced by 11% by 2020.
- 6.19** In April 2020, Border Force proposed the closure of the ePassport Gates Installation Programme to the Home Office Portfolio and Investment Committee (PIC), following its completion. The Home Office told inspectors that the request was refused “and the programme was asked to produce further evidence of Border Force realising the benefits delivered by the gates.” It stated that the work was ongoing but did not provide a date for when it would be completed.

## Return on investment transparency for port operators

- 6.20** Full details of the ROI model are not shared with port operators. Home Office commercial staff told inspectors that “port operators were never given the detail of the ROI. They were given a benchmark figure which they had to be above for Border Force to install gates. If you were below the benchmark, then you can have a discussion about Border Force paying for a smaller stake in the gates or not paying for the service element.” They said that “port operators had a vague idea of what the benchmark was”. Media reports suggested that a figure of 2,000,000

---

30 Luton, Bristol, East Midlands, Gatwick North, Birmingham 1 & 2, Cardiff, Manchester 1 & 2 and Stansted.

in-bound passengers a year allowed gates to be fitted “free of charge” by Border Force,<sup>31</sup> but this figure was not provided to inspectors by the Home Office.<sup>32</sup>

- 6.21** The impact of installing the gates on staff resources is also considered and shared in the conversations with port operators, according to the Home Office. While a bank of 5 gates only requires 2 officers to run them, the Home Office pointed out that “if only three officers are rostered on shift, two will be required for static positions at ePassport gates, leaving only one person to process all others and deal with any issues that arise. That would not improve the flow or overall passenger experience, so this is a more complex consideration than just passengers and money.”
- 6.22** Port operators raised the lack of clarity regarding these investment decisions with inspectors, with one asking what criteria were used to determine whether an airport was eligible for the gates to be installed. They also said that “consistency of service across all ports should be a priority.” This lack of clarity from Border Force about what it will provide as standard services (without charge) across all ports and airports has been raised in previous ICIBI inspection reports. Without this clarity, port operators can be reluctant to fund any additional services, although some have funded the installation of gates themselves. The work on the Border Code, which is examined in Chapter 12, may address this.
- 6.23** In response to the call for evidence, an industry body noted:
- “Following the successful trials of ePassport gates, Border Force rolled them out to airports. They are allocated based on a certain threshold of passenger numbers being achieved and then a bank of five ePassport gates are allocated per a certain number of passengers. It is unclear what those thresholds are: airports are only told whether they meet them, and if so, how many ePassport gates they will receive but not the rationale underlying this allocation. As a precondition for the gates being installed, airports have to commit to employing staff to guide passengers to the gates and help them use them, except at Heathrow Airport, where Border Force fund these staff.” (Inspectors noted that it is Heathrow Airport Limited that funds the presenters at Heathrow, not Border Force.)
- 6.24** Home Office Commercial staff told inspectors that the ROI was only used for the original installation of the gates at a port and they were not aware of the Home Office ever going back to a port and refusing to pay for a service because passenger numbers had decreased or increased since the original installation. They also said that they had not heard of any concerns from port operators about the level of information shared about the ROI model, despite the statements made by port operators to inspectors. If port operators expressed an interest in having the gates installed outside a Home Office installation programme, the Home Office said that it would speak to them on a port by port basis:
- “Conversations (...) are based on the figures for international arrivals provided by ports, and by checking internal data sources. Essentially, the figures must show that passenger numbers will deliver a positive investment for the UK taxpayer. The commercial model is applied equally for every installation in the UK and in all respects.”
- 6.25** In a number of instances, port operators have taken the decision to finance the installation of additional gates themselves, as there is a perception that the gates enhance the customer experience and demonstrate that airports are using the latest technology to process

---

<sup>31</sup> [Minister launches new ePassport gates at Cardiff Airport \(cardiff-airport.com\)](https://www.gov.uk/government/news/minister-launches-new-epassport-gates-at-cardiff-airport)

<sup>32</sup> In its factual accuracy response, the Home Office stated, “Gates are not fitted free of charge. The port operator also has to pay for any infrastructure changes in their port to accommodate the gates.”

passengers. According to the Home Office, as of April 2020, 7 port operators had funded the installation of 50 gates, “amounting to £8m worth of investment”.

- 6.26** Given that these installations are at the request of the port operator, Border Force does not give a commitment to provide staff to operate the additional gates or on the passenger queuing times experienced at them. This was commented on by an industry body in its response to the call for evidence:

“However, despite their investment, airports have no say over the operation of the ePassport gates. Border Force opens the gates based on its assessment of the resource needed for the predicted numbers of passengers. This is not always an accurate reflection of the dynamic environment of an airport where no two days are the same, due to late running flights, weather issues and other unforeseen operational realities. This can mean passengers in a long queue being faced with not all gates being in operation.”

- 6.27** A port operator also commented on the arrangement whereby it was responsible for meeting the service and maintenance costs of the gates that it had financed. They were bound to use the same service providers that were contracted by the Home Office and were frustrated by the service level agreements for the maintenance agreement. They said that “the time taken to repair gates when they go down is excessive” and “when it comes to maintaining the gates, Border Force don’t seem to have an appropriate level of traction with the service provider.”

## Airport hosts and port operator agreements

- 6.28** Airport operators provide ‘hosts’ (also referred to as ‘ambassadors’ or ‘presenters’) to ensure the efficient flow of passengers through the immigration hall. Their role includes, “directing passengers to the correct queue, queue timing, presenting passengers in a controlled way directly to the manual desks...filtering the ePassport Gates queue according to eligibility, and direct hosting of the ePassport Gates. At the ePassport gates, their role was particularly vital given high passenger usage and rapid throughput.”

- 6.29** Home Office commercial staff told inspectors that the provision of hosts was written into port operator agreements, which cover the responsibilities of the port operator and Border Force regarding the installation of the gates:

“The agreements state that operators are expected to provide hosts (1 per 5 gates). Every port is treated in a different way but there will always be hosts required – it comes down to port by port negotiations.”

- 6.30** Inspectors were shown 2 port operator agreements: one for the installation of the gates at Terminal 2 Heathrow in 2014 (although the agreement was dated 2017); and one for the installation of the gates at Terminal 5 Heathrow international to domestic transfers in 2018. Both contain brief references to the provision of hosts. The former states:

“The Port Operator shall provide Hosting Services in accordance with the provisions documented in the Hosting Services Agreement.”



and the latter states:

“2.1 It is the understanding of the Authority that the provision of hosting services will be provided by the Port Operator and that it is the responsibility of the Airline to ensure the required resources are deployed.

2.2 Any issues that the Authority has regarding the resourcing and performance of the hosting services will be raised with the Airline.”

There is no mention of a requirement for Border Force to provide hosting services.

- 6.31** Border Force staff of all grades expressed concerns about the effectiveness of the port operator agreements. A Senior Officer said that they were aware that there was a contract that told port operators that they should provide a hosting service, but it was not specific enough in terms of what the hosts should be doing or how they should engage with passengers. They also said that most passengers thought that the hosts worked for Border Force.
- 6.32** One BF Regional Director said that it “took a long time” for the commercial team to get a port operator agreement in place at one of the ports in their command and “it fell far short of what was needed in terms of hosts”. A lot of the provision had been negotiated locally and was being done so on an ongoing basis. However, they said that the port operator agreement at another port in their command was “far better” as it specified the number of hosts that should be deployed. Another Regional Director reflected on the content of the agreements and said that, depending on the agreement, port “operators might feel that they are able to break them or withdraw hosts. We might have to tighten up requirements.”
- 6.33** Home Office commercial staff told inspectors that Border Force were unlikely to use a port operator agreement to force airports to provide hosting services due to the nature of the agreements. It is in the interests of the port operator and BF to ensure the gates and queues are managed appropriately and switching off gates would be a last resort.
- 6.34** Border Force staff at the ports were unanimous in their positive opinion of hosts, whom they said were “great”, “essential”, “invaluable” and that they cut referrals from the gates “by half”. As well as directing passengers to the correct desks and ensuring that they used the gates correctly (for which some had received training from Vision-Box), inspectors were told that some hosts had language skills.
- 6.35** The training that hosts receive is largely dependent on their employer and varies from port to port. Border Force staff consistently told inspectors that the hosts’ role was complicated and needed a high level of knowledge to carry it out correctly. The central BF Safeguarding and Modern Slavery (SAMS) team had produced a safeguarding training package designed for hosts, which had been sent to regional leads and it was “up to individual ports to engage on the ground”.
- 6.36** The COVID-19 pandemic created a significant downturn in the number of air passengers (figures on GOV.UK show a 91% decrease in arrivals by air in January 2021 compared to January 2020)<sup>33</sup> and airport operators have looked to save costs wherever possible. This meant that some port operators have either cancelled their hosting contracts or placed on furlough all or most of their presenting staff. At some ports, the hosts were replaced with airport staff from other business areas who were inexperienced in the hosting role, while in others, Border

---

33 [Statistics relating to passenger arrivals since the COVID-19 outbreak, February 2021](https://www.gov.uk/government/statistics/passenger-arrivals-since-the-covid-19-outbreak) - GOV.UK ([www.gov.uk](https://www.gov.uk))



Force staff said that cleaners were used to perform the hosting role.<sup>34</sup> This clearly affected Border Force operations, with staff in one location telling inspectors that Border Force Officers were now positioned “at the head of the queues to fulfil the role that hosts usually would.” In other locations, Higher Officers (HOs) and Senior Officers (SOs) said they had “to go and get the queue moving” as the new hosting staff “don’t know what to do”. Of more concern to inspectors were comments from staff at Heathrow who said that roving officers “had to take on some of the queue marshal role and this means that they may miss things”, such as “people trying to use the e-gates with babies, with dogs, push chairs”.

- 6.37** Not all port operators have withdrawn their hosting services in their entirety. One told inspectors that they were continuing to provide a hosting service and had not challenged the requirement for them to do so. Another said that while they did not think that they had a legal obligation to provide a service, they continued to do so because they saw it as “more of a customer experience and making sure that our reputation remains intact.” They also said that they wanted to support Border Force.
- 6.38** The impact of the loss of hosts was most severe at Heathrow Airport, given its higher passenger volumes. Heathrow Airport Limited (HAL) withdrew their ‘passenger ambassador’ function, provided by Omniserv,<sup>35</sup> across the airport at the end of August 2020. The Home Office told inspectors that Border Force had raised concerns about HAL’s decision. HAL did not replace the Omniserv staff but reorganised some of their own staff, positioning a “Passenger Experience Manager (PEM) permanently in the arrival halls at Terminal 2 and Terminal 5, whose primary role was to monitor and assist with maintaining passenger flow.” However, Border Force said that “numerous operational difficulties were identified” which “were considered to be potential risks to border security”:
- “These issues were predominantly focused on numerous breaches around the eGates, which were directly attributable to the lack of presence from HAL following the removal of Omniserv. For example, this included several instances of passengers with babies being able to enter the ePassport Gates which would have been prevented by an ePassport Gate host. On each of these occasions, the passenger was apprehended by a Border Force Officer, but the issues were nonetheless of serious concern to Border Force.”
- 6.39** Border Force told HAL that it would suspend operation of the gates until these issues were resolved and following “repeated occurrences”, Border Force suspended gate operations in Terminal 2 on 13 September 2020. This prompted HAL to increase their resourcing in the arrival halls to 4 to 5 HAL employees until further notice, “undertaking specific roles that were focused on ePassport Gate compliance, passenger flow, and queue filtering”. These changes came into effect on 15 September 2020, when the gates were reopened and since when inspectors were told that “the specific concerns raised by Border Force have been addressed without any further recurrence”.
- 6.40** Border Force Operational Policy told inspectors that no work to evaluate the impact of the withdrawal of hosts at Heathrow Airport had been carried out, but they had provided “support at the time to look at the policy position and offered advice”.
- 6.41** Stakeholders told inspectors of their concerns at the loss of the hosts at Heathrow, with one airline saying:

---

34 During their interview with inspectors, the Luton Airport operator said they had subcontracted the hosting role to their cleaning company, but that other staff, and not cleaning staff, were used as hosts.

35 <http://omniserv.co.uk/Pages/default.aspx>

“the HAL ambassadors who used to present the passengers and advise them how to place their passports correctly at the Egates are not being used anymore, this was driven by a cost reduction in resource which the airlines paid for.”

To address this, their view was that “there should be a UKBF employee deployed to assist the customers, or more dynamic digital screens to assist the customers as they wait.”

**6.42** In response to the call for evidence, an industry body also raised concerns by noting:

“Until 01SEP20 Heathrow Airport Ltd assigned ‘Ambassadors’ to the queuing areas to do precisely that; prioritize passengers/giving directions/etc. Unfortunately, HAL has now removed the Ambassadors from the process since 01SEP20 as a costs savings measure so effects on these travellers may soon become visible.”

**6.43** HAL told inspectors that they recognised the hosts were an “integral part of the flow at the gates” and that they helped “to manage queue size” but the pandemic meant they had had to reduce their costs. They acknowledged that this would leave Border Force “on their own and they don’t really have the resources to do this”, but they noted that passenger numbers were low and would look at different or more automated ways in which they could offer the same service going forwards.

**6.44** The Home Office told inspectors that the role of hosts was being examined by the Border Code (BC) team in the Home Office:

“BC is the delivery partner for Future Border Immigration System, Digitising the Border (FBIS DtB). They are in the process of gathering the current needs for a number of technologies, infrastructure and other requirements. The intention is for the enhanced standards (including role of host) to be written into legislation, with the aim of requiring industry to pay for these standards/services post 2021 as and when they are introduced into legislation.”

## Conclusion

**6.45** Without sight of the contract KPIs or SLAs, it was impossible for inspectors to assess the supplier’s performance against them. The lack of strong contractual agreements regarding the provision of hosts has clearly caused issues for the management of queues in the immigration halls during lockdown and the Home Office should undertake a review to update and strengthen these agreements. Port operators raised a lack of transparency regarding Home Office decisions to finance the installation of gates and the Home Office could share more information with port operators to allay concerns over parity of treatment.

**6.46** Despite Home Office documents recording the benefits of the gates in terms of cost effectiveness and increased staff utilisation, rather than in terms of staff savings, it was surprising that Border Force Officers still believed that the main reason for their introduction was to reduce BFO numbers on the immigration controls. The Home Office could improve its communications with staff regarding the introduction of the gates and their benefits.

## 7. Inspection findings: Staffing at ePassport gates

- 7.1** 'E-passport gates: standard operating procedures' sets out the minimum staffing requirement for the gates to operate:

"The gates must not be opened or allowed to accept passengers without both a monitoring officer and referrals officer present, where local arrangements are that both are required. In locations where there is not a dedicated referrals officer, the process for clearing referred passengers should be reflected in the local operating procedures. The system will not work unless an authorised user is logged into the monitoring terminal."

### Roles at ePassport gates

#### Monitoring officer

- 7.2** The 'E-passport gates: standard operating procedures' also outlines the role of the monitoring officer (MO) as being "responsible for supervising all stages of operation of the gates from opening through to managing their operation and disabling at the end of the scheduled operating hours."

- 7.3** The monitoring officer best practice guide sets out the best practice that MOs should follow when operating at a port with 5 gates or less:

- “• you should ask hosts or presenters to place minors and accompanying adults into adjoining ePassport gates at the same time, or put family groups through a particular gate consecutively, and notify you of the family relationships as they enter
- you should encourage hosts or presenters, where deployed, to engage with passengers, to establish family relationships before the passengers enter the ePassport gates
- you should check surnames of minors in the ePassport gate against adults in parallel gates, or who have recently gone through - if officers are satisfied of the relationship, then allow the minor to proceed
- be aware that there may be a range of reasons why a minor may not share the surname of their parent or legal guardian
- you must never leave the monitoring booth to speak to passengers as this is a security risk and would also stop you monitoring the other 4 gates
- if you are able to engage with passengers without leaving the booth, then you should seek to clarify family relationships, before deciding whether to reject them from the ePassport gates (if satisfied with the family relationship, you should allow them to proceed)
- if you are unable to establish that the accompanying adult has parental responsibility for the minor, then you must reject them from the ePassport gate and refer them to a referrals officer

- you should be aware of intelligence and local trends at your specific port to direct any decision to allow a person to proceed, or reject them and refer them to the referrals officer/staffed primary control point (PCP) who should be informed of any relevant intelligence
- where a host/presenter is deployed and you are not familiar with them, you should check that they are aware of the new one-page guide and that they use this to inform their interactions with you at the ePassport gates
- Higher Officers have been asked to ensure you are provided with a radio wherever possible so that you are able to contact them if you have concerns regarding a minor or vulnerable person which would then enable the Higher Officer to attend and conduct further checks.”

**7.4** MOs at ports with 5 gates or less have an additional safeguarding responsibility. The procedure outlines this as:

“...5 eGate ports do not have a roving officer and therefore monitoring officers will have additional safeguarding responsibilities. You should be extra vigilant of unaccompanied minors using the eGates and should not permit them to proceed through the eGates. This may require you to interact with the minor to ensure that they are not accompanied, or to verify any concerns you may have before doing so. In all cases, unaccompanied minors should be rejected and referred to the referrals officer to accompany them to the primary control point (PCP).”

**7.5** MOs have 3 principal tasks at ports with more than 5 gates:

- to ensure that the gates are used correctly, by only one passenger at a time
- to monitor any Warnings Index (WI) matches
- to log and report any technical faults with the gates

And an additional task at ports with 5 gates or less:

- to ensure that any children aged 12-17 who use the gates are accompanied by a responsible adult

**7.6** The MO is required to monitor up to 10 gates at a time (at ports where there are more than 5 gates). This is done by watching a screen showing live CCTV footage of up to 10 gates and the passengers passing through them. This was increased from 5 gates in 2017 following a monitoring officer efficiency evaluation that sought to automate much of the MO decision-making. As the evaluation report states, “the intention of these changes will allow MOs to double their capacity without increasing their workload considerably (i.e. doing less with each gate so that more gates can be monitored concurrently).”

**7.7** According to the standard operating procedures, the role of an MO will rotate throughout the day as part of a fixed point system.<sup>36</sup> The Standard Operating Procedure (SOP) states, “it is recommended that you do not operate the gates for more than 30 minutes of continuous, uninterrupted passenger processing. For operational reasons this may be longer but should not exceed one hour.” This is broadly in line with the FRONTEX (the European Border and Coastguard Agency) best practice guidelines for monitoring officers which recommends, “the maximum surveillance time for an operator SHOULD be no longer than 30 minutes. The operator and the assisting personnel MAY change their tasks at intervals of 20-30 minutes.

---

36 A fixed point is a specified duty, usually lasting for one hour, during an officer’s shift.

If there are natural pauses in the traveller flow (e.g. because of flight schedules) or if the frequency of the traveller flow is moderate an operator MAY work for periods longer than 30 minutes.”<sup>37</sup>

- 7.8** Monitoring officers told inspectors that these timings were rarely adhered to at their ports. Inspectors heard comments such as, “I have worked up to 3 hours as monitoring officer”, and “3 or 4 hours is fine. I still feel effective”. Others told inspectors, “it’s difficult to concentrate after 2 hours”, and “I don’t mind. There is not a lot that an MO has to do other than look at the screen.” Inspectors were concerned that the recommendation to operate the gates for no more than 30 minutes (or a maximum of one hour for operational reasons) was routinely ignored, and by the degree to which it was exceeded.
- 7.9** MOs watching passengers as they pass through the gates on their screen must ensure that only one passenger enters the gates at a time. An alarm should sound if the gate door is forced or blocked, or if the gate detects an incident of tailgating (where a second passenger follows someone into the gate). In these circumstances, MOs are required to acknowledge the alarm, close the gate and alert the duty manager (usually a Higher Officer). All significant ‘incidents’ must be recorded by the MO in the ‘gates incident log’ which is kept on the MO’s desk during the hours of operation. The MO is required to record all incidents as soon as reasonably practicable.
- 7.10** The e-Passport gates check to see whether a passenger is subject to a watchlist match and will flag the details of the match to the Border Force Officers performing e-Passport gate roles for appropriate follow up action depending on the nature of watchlist entry, including informing the watchlist data owner of the encounter at the border. This may be done by referring to a Higher Officer so that the MO does not need to leave their post. [Redacted] Delays can occur for legitimate operational reasons. [Redacted] Inspectors were unable to carry out detailed observations of the MO role (because of the COVID-19 restrictions in place at airports due), so are unable to comment directly on the performance expectations of the MO role.
- 7.11** Some BF customs staff and Counter Terrorism Policing officers who have an alert on an arriving passenger feel that the only way to ensure that they are able to identify that passenger is to send a staff member to work alongside the MO and watch out for the passenger in question. [Redacted]
- 7.12** When asked about this apparent weakness in the alerts system, a Home Office official told inspectors that there was a telephone referral system available to Counter Terrorism Policing and customs in order to put subjects of interest on the WI at short notice.<sup>38 39</sup> [Redacted]
- 7.13** The third of the main duties that falls to MOs is to log and report technical faults at the gates. This can be also be done by super users (BFOs with additional responsibilities for overseeing the gate function at a port). Faulty gates have to be switched off to await an engineer. The MO (or super user) calls the ITnow (Home Office IT service), reports the fault, and informs the duty BF Higher Officer. MOs who spoke to inspectors were broadly happy with this arrangement, although some complained about the length of time that the call was left on hold before ITnow answered. Most faults are fixed within 2 hours, but it may take longer if an engineer is required on site. However, Home Office Digital Data and Technology (DDaT) staff told inspectors that some delays were due to BFOs “bulk reporting” several faults all at once. Regardless, staff

---

37 [Best Practice Operational Guidelines for Automated Border Control \(ABC\) Systems; Frontex Research and Development Unit; September 2015](#)

38 [Redacted]

39 [Redacted]

across the Home Office agreed that this was an improvement on the previous process, which ceased in April 2020, and required BFOs to complete a spreadsheet and email it to WICU, who then contacted ITnow on their behalf.

- 7.14** At ports with 5 gates or less,<sup>40</sup> the MO has an added child safeguarding responsibility. At ports with more than 5 gates this role is carried out by the roving officer (see below). As ports with 5 gates or less are not required to deploy a roving officer, the child safeguarding role falls to the MO.
- 7.15** When a child aged 12-17 uses a gate, a pop-up message appears requesting that the MO authorises the child to continue. The MO is required to ensure that children are accompanied by a responsible adult, by watching the queue or by comparing names of adults using the gates at the same time. In practice, inspectors are unclear as to how realistic it is for MOs to carry out this task. MOs do not always have a direct line of sight with the gates and are rarely close enough to be able to communicate directly with passengers. MOs at some ports have no means of communication with hosts or with other BF staff working directly with the gates.
- 7.16** Inspectors considered that the child safeguarding element of the MO role could be better carried out by staff stationed before the gates. Roving officers or hosts would be better placed to ensure that any children using the gates are accompanied by a responsible adult.

## Referrals officer

- 7.17** The deployment of a referrals officer at a Primary Control Point (PCP) desk is also required for the gates to be opened. Passengers rejected by the gates, for whatever reason, are termed 'referrals' and are directed to the referrals officer to process at the PCP. The 'E-passport gates: standard operating procedures' outlines the responsibilities of the RO role:

"As a referrals officer, you are responsible for manually processing passengers who have been rejected from the gates. You will be required to handle all referrals as a priority, but you also may be required to process passengers from the adjacent queue when not dealing with referrals.

On the referrals desk you must always assume that a passenger has been referred because they may be an impostor.

All referrals should be examined with special care, and officers should bear in mind the reasons for the gates rejection when deciding whether the passenger should be allowed to proceed.

You may not be aware of the exact reason for referral but as up to 75% of rejections are for facial recognition failure, this should be borne in mind when comparing the passport image with the passenger presenting it. The examination of referred passengers should include the necessary watchlist checks and any additional checks necessary to resolve doubts about their bona fides. You must follow the latest instructions (IOIs) about how to handle different kinds of WI hits at e-passport gates."

- 7.18** Inspectors were told by Higher Officers that more experienced BFOs were routinely placed on referrals officer duty, where resourcing allowed, at all of the 5 ports inspected.<sup>41</sup> If this

---

<sup>40</sup> Airports at Birmingham, Cardiff, East Midlands, Edinburgh IA1, Glasgow, London City, Newcastle and the juxtaposed controls at Brussels and Paris all have 5 gates or less.

<sup>41</sup> Glasgow, Heathrow, Luton, Manchester and Stansted.

was not possible, a forgery officer was always on duty to take referrals. Referrals officers told inspectors that they regularly used the Imposter Detection Equipment (IDE) to mitigate any risk presented by imposters being rejected by the gates.

- 7.19** Imposter Detection Equipment (IDE) uses facial recognition technology to assist Officers in determining whether a passenger is the rightful holder of their travel document. The IDE conducts facial recognition checks against the document presented. Under normal operating conditions, all passengers who are rejected by the ePassport gates should be checked using the IDE which is located on the referrals desk.
- 7.20** Although inspectors were unable to observe the IDE in use, referrals officers at ports viewed the IDE equipment positively. They were confident in their ability to use it and thought that it added real value. One Officer noted that the upgraded IDE gave extra confidence when looking for imposters at the referrals desk.
- 7.21** Staff also told inspectors that the referrals officer has an important safeguarding role, as they regularly deal with unaccompanied children who are unable to use the gates. This typically includes enquiries about authority to travel and reception arrangements in the UK.

## Super user

- 7.22** The role of super user merits just a few lines in the 'E-Passport gates: standard operating procedure', which states the following:
- "People carrying out this role will be identified (with a contact number) in the ports' local operating procedures. The role will include:
- ensuring that the gates incident log is maintained
  - escalating issues recorded in the gates incident log where appropriate
  - informing monitoring officers of any mechanical problems with the gates
  - ensuring cleanliness of the gates area and monitoring station"
- 7.23** The super user also has a training responsibility. It is the super user who trains and mentors new staff on the MO role. Inspectors were told that there was no standard training package for MOs and that training was carried out 'on the job' and typically lasted about an hour.
- 7.24** The super user may also escalate technical faults to ITnow, but this task is often carried out by the MO. The super user role is not a designated duty, and officers carry out this role as part of their rostered shift.

## Roving officer (RO)

- 7.25** The roving officer role was introduced in 2015 in response to child safeguarding concerns when the use of the gates was expanded to include accompanied children aged between 12 and 17. During the expansion trial in 2015, a uniformed BF officer known as a roving officer was deployed ahead of the gates. They were tasked to monitor, and if necessary, intercept, groups of passengers that included children under the age of 18 and conduct brief questioning to establish whether further examination was required. The gates became available for use to all British and EU citizen children aged between 12 and 17, if accompanied by an adult, on 10 April 2017.



- 7.26** The RO role remains BF's principal means of identifying vulnerability at the gates and must be deployed at all ports where more than 5 gates are in operation. As stated in the BF guidance for ROs, where more than 10 gates are in operation, "it is recommended 2 or more Roving officers are deployed to man the e-Passport gates". The guidance also states:
- "The primary objective of deploying a Roving officer is to prevent trafficking and provide safeguarding assurances by heightening security around ePassport gates.
- As arriving passengers using the ePassport gates are not routinely questioned by an officer, the Roving officer role is to mitigate the risk of vulnerable children and adults passing through e-Passport gates undetected."
- 7.27** The role of the RO has expanded from the sole requirement to monitor children using the gates. Outside of school holidays, volumes of child passengers are lower. The Home Office told inspectors,
- "Partly due to the increased number of passengers, the role of the Roving Officer is generally accepted to have expanded beyond its original purpose. For example, drawing on behavioural detection techniques, Roving Officers may be tasked with a much wider remit including detecting immigration and customs abuse, criminality, and counter-terrorism."
- 7.28** It was not clear to inspectors when the role expanded, although inspectors noted it was mentioned in the review of the trial to expand gate use to accompanied children aged between 12 and 17. The Home Office said that, as a result, "a review was commenced in late 2019 to consider changes to the RO role including the role's description, scope, and training recommendations." The conclusion of the review had been delayed by Border Force's response to COVID-19 and preparations for the end of the transition period for the UK's departure from the EU, and a timescale for its completion was not provided.<sup>42</sup>
- 7.29** ROs are expected, as the name suggests, to rove between the gates and the arrivals gate, to identify passengers of concern. If a passenger gives rise to any concerns, the RO must:
- intercept the passenger and conduct brief questioning to establish if further examination is required
  - if there are no concerns and any individuals identified are judged eligible to use the e-Passport gates, allow those passengers to proceed
  - direct individuals of concern and unaccompanied children to the referral PCP desk for further questioning by a Border Force officer"
- 7.30** Despite the complex nature of the RO role, inspectors were consistently told by those carrying it out that they felt able to fulfil the expectations of the role. One officer told inspectors, "You have time to observe passengers coming through. We have seen trafficking cases. We send them to the referrals officer. If they are vulnerable, we can refer to SAMS [the Home Office Safeguarding and Modern Slavery] team."
- 7.31** Inspectors asked ROs if the expanded border security role had created a 'watering down' of the safeguarding element. Officers differed in their views of the impact. One officer told inspectors, "Does it take away from vulnerability role? No, you can do both. Primary is minors but the job dictates you have to do other things too." Another told inspectors, "It's a resource

---

<sup>42</sup> In its factual accuracy response, the Home Office stated: "BF Ops Policy have reported that phase one is complete and that phase two of the review is likely to begin later in 3rd quarter of FY2021/22. This will explore the feasibility of an expanded role for the RO and will be in line with the proposed lifting of current travel restrictions, including the reopening of eGates, which will allow a more meaningful analysis."



issue. The broader the role is, the more diluted it becomes. It's a good idea but only if there are more roving officers."

## Training

- 7.32** One of the ICIBI's expectations is that "Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent". All staff should "receive[s] the training they need for their current role and for their professional development".
- 7.33** Currently, there is no central training for any of the above-mentioned gate roles, beyond the standard induction training for new officers and requirements to complete bi-annual e-learning packages on vulnerability.
- 7.34** Since 2017, all new BF officers in public-facing roles complete a 4-hour classroom-based training course on 'Protecting the Vulnerable' (PTV) as part of their core skills training. The Home Office told inspectors that PTV training had already been rolled out to Higher Officers (HOs) and Senior Officers (SOs) at UK ports, and a schedule had been developed to ensure that all BFOs that did not complete it as part of their induction training will receive it in 2021.
- 7.35** Super users told inspectors that they had received initial training on how the gates work from Fujitsu or Vision-Box but that this had been "several years ago when the gates were first installed." There had been no refresher training since. Inspectors were provided with a Vision-Box training package for BF staff, containing 6 slides that set out the main differences of the new generation gates and some basic information about their set up.
- 7.36** Super users in turn provide training and mentoring to new MOs. This is typically informal 'on the job' training lasting about an hour. Given the lack of updates to this training since it was first provided, inspectors were concerned about its effectiveness.
- 7.37** When the MO role was expanded from monitoring 5 to 10 gates in 2017, Border Force provided MOs with a set of 'BFO Training Slides' explaining the changes to be made as part of the MO Efficiency Changes.
- 7.38** Referrals officers receive no specific extra training in relation to the gates, although it is common practice to deploy the most experienced officers to this role.
- 7.39** Roving officers are required to have completed personal safety training (level 1) as a minimum before deployment. There is also an increased use of behavioural detection (BD) trained officers in the RO role (see reference to the broader border security role now undertaken by ROs above). Heathrow Terminal 2 has created a dedicated RO team where all officers are required to undergo a 3-day BD training course (see Chapter 9 for further information about this development).
- 7.40** The BD training has been well received by staff and is available to BFOs performing the roving officer role. There are unfortunately limited places on the training course and staff have struggled to find availability. BF has recently introduced a 40-minute online BD training package, designed by a commercial company that will be rolled out to all BFOs during 2021. Inspectors were concerned that the online training could be used as a substitute for the 3 day course and would encourage BF to ensure attendance on the 3 day course by all roving officers.<sup>43</sup>

---

43 In its factual accuracy response, the Home Office stated, "BF Ops Policy managed the development of the BD E learning package which was rolled out in May 2021. All communications made it clear that this does not replace the formal 3-day BD training course."

## Staff guidance – working at the gates

- 7.41** With regard to guidance documents, the ICIBI's expectation is that "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.)" Background and explanatory documents should be "kept up to date" and "readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)".
- 7.42** The 'Border Force Operating Mandate' sets out the full border security checks to be conducted by Border Force officers, or through automated processes, on people and goods arriving in and departing from the UK. It also defines the actions to be taken in response to the outcome of those checks. The document was last updated on 2 February 2015 and was reviewed on 15 November 2017. It makes no mention of the expansion of use of the gates to children aged 12-17, or to B5JSSK nationals. In August 2020, the Home Office told inspectors that it was "due to be updated by the end of this year to take account of wider changes on checks required as a result of the UK leaving the EU. The B5JSSK amendments will be made at the same point". However, as of April 2021 it did not appear to have been updated.<sup>44</sup> The Operating Mandate is accessible on the Home Office intranet, and BF staff who spoke to inspectors were all aware of it and its importance in setting out the checks that they were required to undertake on arriving passengers and goods.
- 7.43** Horizon also contains the specific ePassport gates guidance. 'E-passport gates: standard operating procedures' includes guidance for monitoring officers, referrals officers, hosts and super users. The same site contains specific best practice guidance for MOs at ports with 5 gates or less and best practice guidance for Higher Officers overseeing the gates operation. Horizon also contains separate guidance for roving officers. BFOs at 3 airports who were interviewed by inspectors claimed never to have seen it and others did not know how to access it. The Home Office told inspectors that Interim Operating Instructions (IOIs) issued by Border Force National Command and Control (BFNCC) were cascaded to all BF operational staff by email to provide advice on changes to procedures at the border.

## Border Force reviews of gate staffing

- 7.44** As at April 2021, BF had either recently reviewed or was in the process of reviewing the 3 principal gate roles. The review of the monitoring officer (MO) role by BF Operational Policy was completed in August 2020. The review identified several areas that could improve the ability of MOs to carry out their safeguarding responsibilities, such as close liaison with hosts, and comparing the names of children with adults using the gates simultaneously. The review resulted in the best practice guidance for MOs at ports with 5 gates, issued on 17 August 2020.
- 7.45** BF National Operations HQ Operational Oversight Team, with involvement from BF Human Resources, conducted a review and job analysis of the referrals officer role and reported on 2 September 2020. The review provided a standard job description for the referrals officer role. Conscious that the referrals officer is most likely to come into contact with imposters, forgeries, passengers on Home Office watchlists, high-harm individuals, customs and safeguarding cases, the HR process agreed the role was appropriate for the Border Force Officer grade.

---

<sup>44</sup> In its factual accuracy response, the Home Office stated, "the Operating Mandate is currently being updated".

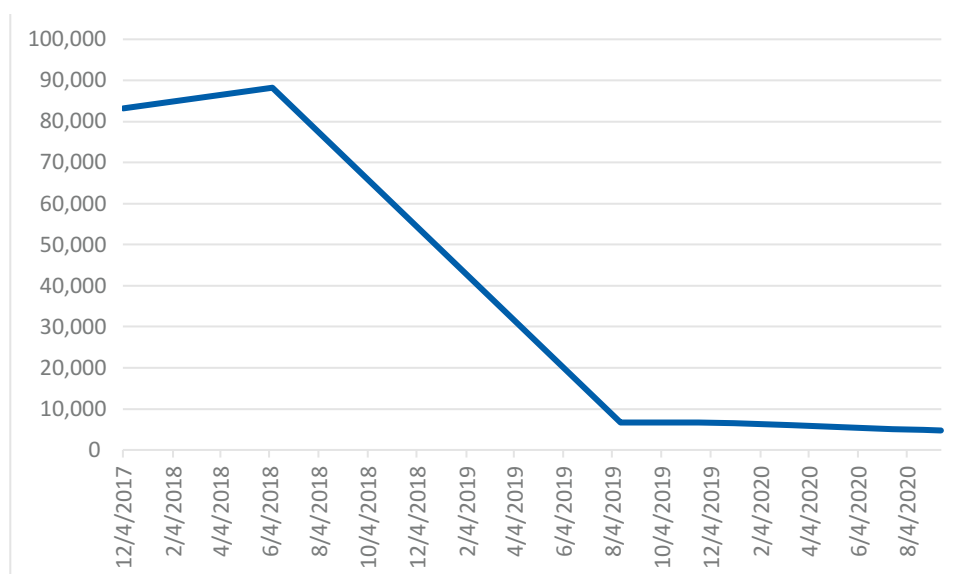
**7.46** In response to the need for roving officers to take on a wider border security role, the Home Office Analysis and Insight team carried out an exercise at Heathrow Airport in September 2019 to compare the performance of the dedicated and upskilled RO team (who had received both Behavioural Detection training and bespoke in-house training offered at Terminal 2), with a non-dedicated, non-upskilled team of ROs from the same terminal. The report concluded that there may be a benefit in upskilling ROs and suggested that there are additional benefits to the RO role beyond monitoring passengers at the gates in a safeguarding capacity. There may also be a benefit to increasing the mandated number of ROs on duty at ports with more than 10 gates. The report forms part of a wider BF review of the RO role that is due to be completed later in 2021, so the findings have yet to be implemented.

## 8. Inspection findings: Gate expansion by passenger cohorts

### Registered Traveller Scheme (RTS)

- 8.1** The RTS is designed to make it easier for regular travellers who hold eligible passports to transit through immigration controls at major UK ports of entry. The scheme was initially introduced in April 2015 to serve travellers from Australia, Canada, Japan, New Zealand and the USA. Eligibility has expanded since then to include another 35 nationalities.
- 8.2** Figure 4 shows the number of members registered on the RTS between December 2017 and September 2020, according to figures provided by the Home Office.

**Figure 4:** Members registered on the RTS between December 2017 and September 2020



- 8.3** There has been a sharp decline in registered members of the RTS from April 2019 onwards. This coincides with the expansion of use of the gates to B5JSSK nationals. B5JSSK nationals made up the bulk of registered RTS members prior to the expansion. On 7 June 2018 there were 88,209 registered members of the RTS. 83,279 (94%) were from B5JSSK countries.
- 8.4** The Home Office told inspectors that RTS income was, on average, 95% lower in the latter half of 2019 than in the same months of 2018. The reason for this change was the ability of B5JSSK nationals to use the gates without having to become a member of a paid service.
- 8.5** Inspectors were told that the RTS service will be kept open for the benefit of travellers who are not from B5JSSK countries. There have been no changes to the scheme aside from extension of eligibility since its inception and, despite the reduction in use, the Home Office did not indicate that there were any changes planned.

## Expansion to 12-17-year olds

- 8.6** The gates became available for use to all British, EEA and Swiss national children aged between 12 and 17, if accompanied by an adult, on 10 April 2017. Inspectors reviewed a Home Office evaluation of the extension to this cohort. Documents showed that children were able to use the gates and that the extension of use was a success from a gates performance perspective. The referral rate in the 12-17 age group was only slightly above that of adults and so “is not operationally significant and has no discernible impact on the resources at the ePassport gates referrals desk”. The evaluation showed that 12-17-year olds have the highest fail rate at the gates of all eligible cohorts, but a senior manager in DPS told inspectors that this was likely to be due to the fact that children’s faces can change quite significantly as they age.
- 8.7** Evaluation of the extension to this cohort also found that ports were able to successfully stream large volumes of children through the gates. The Home Office saw an increase in use from eligible passengers who would otherwise not have been able to use the gates (i.e. adults accompanying their children), alongside the natural increase associated with extending the eligibility to this cohort.
- 8.8** The Home Office evaluation also concluded that the number of EEA children travelling through the UK border who were identified as at risk of trafficking, Modern Slavery, Female Genital Mutilation (FGM), Forced Marriage and Domestic Servitude was low compared to overall passenger numbers, making it a challenging risk for Border Force to manage. As seen in Chapter 7, the roving officer role is seen as providing a consistent and visible way of deterring and identifying potential trafficking.

## B5JSSK expansion

- 8.9** The use of the gates was extended to visitors and entry clearance holders from Australia, Canada, Japan, New Zealand, Singapore, South Korea, and the United States of America (the B5JSSK nationals) on 20 April 2019. Citizens of these nations can use the gates provided they are over the age of 18 or accompanied by an adult if they are aged between 12-17.
- 8.10** These changes required the introduction of the Immigration (Leave to Enter and Remain) (Amendment) Order 2019, allowing the citizens of the 7 nations to use the gates. The statutory instrument was laid before parliament on 3 December 2018. Article 8B contains the changes to legislation.<sup>45</sup>
- 8.11** In 2017, B5JSSK nationals represented 51% of all non-EEA arrivals and 7% of all arrivals in the UK. The extension of use to these nationals was in line with the government’s plans for the Future Borders and Immigration System at a time of increasing passenger numbers.
- 8.12** The extension of use to B5JSSK nationals is seen as a success by Border Force staff and port operators. With increased usage of the gates, ports with the highest volume of traffic have been able to reduce queuing times and increase efficiency at the border. Benefits of the

---

<sup>45</sup> “(1) A person to whom this article applies may obtain leave to enter the United Kingdom by passing through an automated gate.

(2) This article applies to a person who—

(a) is a national of Australia, Canada, Japan, New Zealand, Singapore, South Korea or the United States of America;

(b) is travelling on a passport issued by one of the countries listed in sub-paragraph (a);

(c) is aged 12 or above; and

(d) is seeking to enter the United Kingdom as a visitor (standard) under Appendix V to the immigration rules.

(3) Leave under paragraph (1) is given for a period of six months.

(4) Such leave is subject to conditions prohibiting employment and recourse to public funds (within the meaning of the immigration rules).”

extension were seen immediately, with a 50% reduction in queue time breaches recorded in the week following the extension when compared to the same week in 2018. It is clear from the data and analysis provided by the Home Office that the extension of use to B5JSSK nationals was a success in facilitating lower risk nationals through the UK border more efficiently than previously.

- 8.13** Interviews and focus groups with BFOs, Senior and Higher Officers reinforced this. The benefits described have been felt most at those ports where passenger profiles mean that a large number of the port's passengers are now eligible to use the gates. Officers at Heathrow described a reduction in Service Level Agreement (SLA) queue times and an increase in gate usage. One officer described the extension as having the effect of "eating up a huge chunk of passengers at Heathrow". A Senior Officer said that the extension had made a huge difference to queue pressures, relieved pressure on the PCP, and provided the opportunity for Officers to concentrate on higher risk passengers.
- 8.14** Whilst there is clear evidence to suggest that the extension of use to B5JSSK nationals has had an impact by processing large volumes of passengers through the gates, inspectors saw Home Office documents, and heard from stakeholders and BFOs about a number of issues surrounding the extension.

## **B5JSSK expansion guidance for BF staff**

- 8.15** One of the ICIBI's 'Expectations' concerns background and explanatory documents. The expectation is that these are easy to understand, use, and find, and that these documents are kept up to date. Another 'Expectation' is that individuals or teams who are exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary are fully competent, this includes making sure that individuals and teams have the tools and support to perform their roles effectively and have a good understanding of their role and function.
- 8.16** The Home Office told inspectors that comprehensive guidance on the changes made to the way that B5JSSK nationals are processed when seeking entry to the UK was issued to Border Force Officers (BFOs) on 7 May 2019. This was in preparation for the expansion of use of the gates to these nationalities later that month. It said that while the Border Force Operating Mandate was not updated (the last update was 2 February 2015) to reflect the change, it would be by the end of 2020 when it would also be updated to reflect the wider changes on checks required as a result of the UK leaving the EU. However, as of April 2021 it did not appear to have been updated.<sup>46</sup>
- 8.17** The Home Office provided inspectors with copies of the guidance and the dates on which it was published and made available to BFOs, details of which are contained in the table below. Alongside this, Border Force staff were made aware of the upcoming changes via global email correspondence, the first of which went out to BFOs on 29 October 2018.

---

<sup>46</sup> In its factual accuracy response, the Home Office stated, "the Operating Mandate is currently being updated and will include the B5JSSK amendments".

Figure 5

Guidance related to B5JSSK expansion provided to BFOs		
Title	Description	Date published
IOI 20-19 Temporary pop-up instructions	Pop up instructions for Monitoring Officers when an RTS member from a B5JSSK country uses the gates	8 April 2019
IOI 27-19 Technical testing	IOI informing BF Officers that a small number of eligible B5JSSK nationals will be able to use the gates from 23 April 2019. This is a test of technical capability	23 April 2019
B5JSSK v1.0 – Guidance (A-Z)	Guidance in relation to the expansion of use to B5JSSK nationals and the processing of these nationals at the gates and the PCP	7 May 2019
Processing B5JSSK nationals	FAQ	18 May 2019
Horizon notice	Horizon notification of the gates expansion and landing card removal	20 May 2019
B5JSSK v2.0 – Guidance (A-Z)	Guidance in relation to the expansion of use to B5JSSK nationals and the processing of these nationals at the gates and the PCP	31 December 2020

- 8.18** Inspectors were shown an October 2019 Border Force Analysis (BFA) report on staff perceptions of the B5JSSK expansion. For this report, BFA spoke to BFOs and hosts across Gatwick, Manchester and Heathrow airports to understand their perception of the expansion and how well it was communicated to staff.
- 8.19** In this report, officers expressed concerns that they got very little time to read emails and would tend to prioritise emails addressed to them, rather than the global emails they received about the expansion. A number of frontline staff reported that they only found out about the expansion in March/April 2019, and only one officer of those canvassed<sup>47</sup> was aware of the FAQ (frequently asked questions) pack that had been emailed out to all officers.
- 8.20** Inspectors considered that from the dates of publication of guidance, and Border Force's own report on staff perceptions of the expansion, communications and guidance surrounding the expansion could have been delivered earlier, and in a format that was more likely to be read by BFOs.

## Erroneous use of the gates

- 8.21** B5JSSK nationals who enter the UK through the gates no longer have their passport stamped as an endorsement can only be issued to passengers who see an officer at a Primary Control Point desk. This led to some initial difficulties for short term students (STS) and those entering for short term employment (Tier 5 and permitted paid engagement visa holders) from B5JSSK countries who used the gates in error, as they were unable to show their respective educational institutions or employers their date of entry to the UK.

47 BFA conducted interviews with 23 Border Force and host staff across Gatwick, Manchester and Heathrow.



- 8.22** A number of submissions to the ICIBI's call for evidence referred to issues experienced by short term students (STS) or Tier 5 artists. Stakeholders described passengers being directed to use the gates incorrectly by BFOs, and instances of travellers being required to leave the country and return in order to receive the correct passport endorsement. One stakeholder noted that it "appears that staff are not sufficiently trained to triage queues and the onus is put on the travellers" and described the mechanism to correct erroneous use as "expensive and disruptive". Another described the alternative evidence that could be used to prove entry in the absence of a passport endorsement, such as boarding passes or travel itineraries, as "easily subject to manipulation" and "evidence of a lack of joined up thinking on behalf of government".

## Identifying the risk

- 8.23** Home Office documents indicate that the risk of ineligible cohorts, that is cohorts who are not permitted to use the gates (including STS, Tier 5 and permitted paid engagements), potentially facing issues due to the lack of a passport endorsement was identified before the expansion of use to B5JSSK nationals. A Home Office document dated March 2019 said, "As existing ePassport gate technology cannot identify exemptions in passports, any B5JSSK nationals from the cohorts identified who use the gates are legally allowed to enter the UK as a visitor, but without the necessary passport endorsement are not allowed to complete their intended activities once they have formally entered the UK."
- 8.24** The cohorts identified by the Home Office were judged according to the risk they posed to the immigration control. Tier 5 artists and permitted paid engagements were seen as low risk as numbers of these passengers are fairly low. STS were identified as higher risk as the numbers that could potentially use the gates in error were much higher. Inspectors saw a document which estimated that there could be 85,000 STS that could bypass the PCP in error.

## Signage and engagement

- 8.25** In order to mitigate the risk of erroneous use of the gates, the Home Office relied on airport signage and engagement with educational establishments and sponsors. The aim was to increase awareness of the need for B5JSSK nationals to see a Border Force Officer when entering the UK for short-term study, those coming under the Tier 5 concession, or those coming to carry out a permitted paid engagement. An internal Home Office document stressed the "importance of extensive communication with these passengers throughout their journey informing them of the correct UK entry process".
- 8.26** Publicity materials and signage were produced to provide specific information aimed at travellers from the B5JSSK cohort who were classed as "eGate exceptions". Inspectors were shown examples of the signage that was used at the gates to inform travellers from the cohorts identified that they should see an officer at the PCP rather than use the gates. Inspectors were not provided with any analysis of the effectiveness of the signage aside from a 2020 Border Force Operational Assurance Directorate (OAD) report which focused on the STS cohort.
- 8.27** The report found that while there was a good amount of signage, it was inefficiently placed and, in some cases, passengers were faced with multiple signs making it difficult to easily identify what related to them as B5JSSK nationals. This view was echoed by BFOs, who told inspectors that the signage for passengers was inadequate. A number pointed to the fact that all of the signage was in English, and that many passengers could not read the instructions. Officers suggested that the use of images would be more appropriate to counter this problem.



Some officers believed that the signage around the gates was adequate but that “people don’t read the signs”.

- 8.28** Engagement with educational institutions was seen as having a positive impact on the number of STS who used the gates in error. One Home Office document described communications that had been put in place with colleges and universities as resulting in a “reduction in the number of STS that are incorrectly processed”. An OAD report detailed instances of students being issued with letters from their educational institutions advising them of the correct UK entry process and of passengers being sent a letter by UKVI informing them that they would require an endorsement in their passports. The report noted that most officers felt that “engagement through education establishments and UKVI had avoided issues”.

## Correction of erroneous gate use

- 8.29** Alongside signage and engagement, the Home Office issued guidance to BFOs, educational institutions, and others on how erroneous use of the gates could be corrected. The process for varying the leave of passengers who used the gates in error varied depending on the category of passenger, and whether the passenger had left the controlled zone by going through customs.

## Passenger still at the control

- 8.30** BFOs are encouraged to vary the leave of passengers who highlight their erroneous use of the gates to an officer before leaving the controlled zone. BFOs do this by endorsing the passport of the traveller with the correct stamp. Guidance on the GOV.UK website encourages those who have used the gates by mistake to “please see a Border Force officer before you leave the port to receive a stamp in your passport.”<sup>48</sup> Border Force guidance issued to officers on 22 August 2019 informed them that “where a Short-Term Student flags to a Border Force officer before they leave the control that they have been processed incorrectly, the officer should examine them and then determine whether to vary the individual’s leave in person”. This is the same process for all migrant categories.
- 8.31** Inspectors spoke to BFOs to check their understanding of what to do if a short term student notified them that they had used the gates in error before leaving the control. During interviews and focus groups, BFOs and some Senior and Higher Officers generally echoed the guidance. Most were aware that they should provide an endorsement if the passenger had not yet left the control. However, inspectors were told by one officer that STS “don’t know about the rules. Sometimes they come back and ask for a stamp. I don’t give them one. People use the gates and then ask for a stamp, just to beat the queue.”
- 8.32** Inspectors saw an OAD report on student arrivals, in which BFOs’ knowledge of the processes for varying leave of student who used the gates in error was measured. The report highlighted that although officers were aware that STS could not use the gates and that they should bring them back to the PCP if they had used them in error, the process for varying leave and endorsing their passports was less well known. The report found that “BF staff knowledge about which cohorts of B5JSSK passengers could/could not use the eGates, as well as how to process B5JSSK short term students who had used the ePassport gates in error, was poor in some areas”. Only 61% of the officers spoken to knew that they should endorse the passport, and only 16% of officers knew that the passenger’s leave required varying”. This report was

---

<sup>48</sup> <https://www.gov.uk/government/publications/coming-to-the-uk/faster-travel-through-the-uk-border#getting-your-passport-stamped-by-a-border-force-officer>

published in November 2020 and suggested that NOHQ (National Operations Headquarters) and BF operational policy should consider what more could be done to raise awareness of how to deal with B5JSSK nationals who had used the gates in error.

## Passenger has left the control

**8.33** Where a passenger has left the controlled zone by going through customs, they are ‘landside’ and cannot be brought back to the immigration control to rectify errors in their leave to enter. To rectify leave in this situation, there were different processes in place for different categories of migrant.

**8.34** For Tier 5 migrants, the Home Office introduced a system whereby those who enter the UK as a Tier 5 migrant through the gates can email a dedicated inbox to request a letter to vary their leave.

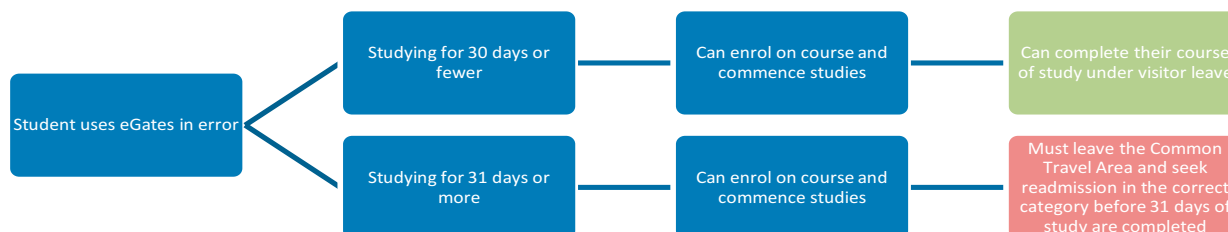
**Figure 6:** In-country process for varying leave of Tier 5 migrants who use the gates in error



The reasoning behind this solution for Tier 5 Migrants was that they are generally in the UK for a short period of time to take part in specific shows or events.

**8.35** For STS who used the eGates in error, the Home Office provided guidance for educational institutions whose students failed to obtain the necessary leave to enter the UK from a BFO. This stated that institutions could enrol the student but required them to leave the UK and re-enter via the Primary Control Point (PCP) within 30 days. This was echoed in guidance for BF staff which stated that “Generally, Short-Term Students who have obtained the wrong type of leave at port through their own error are required to leave the Common Travel Area (CTA) and seek the correct form of leave on re-entry.”

**Figure 7:** In-country process for varying leave of STS who use the gates in error

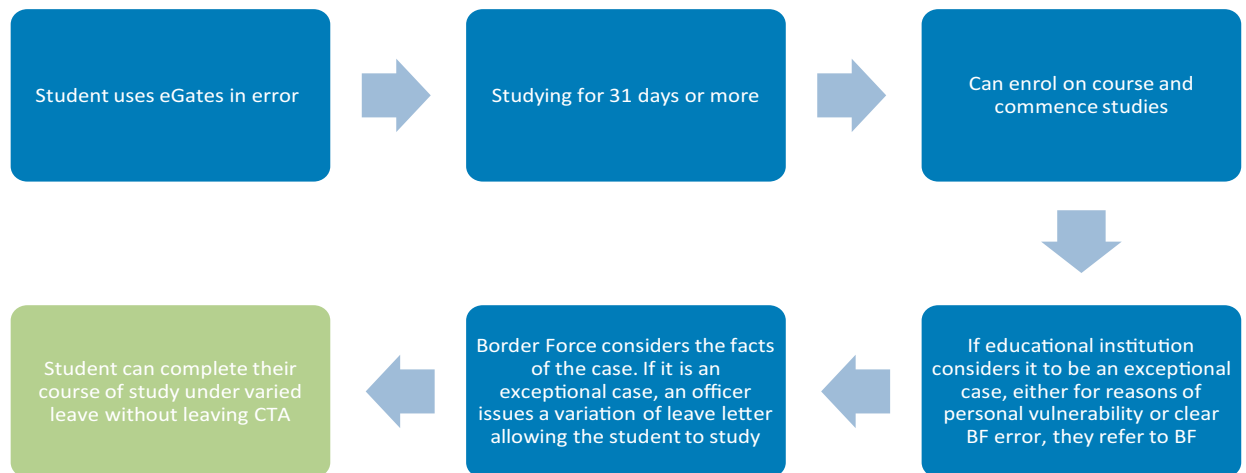


**8.36** Home Office documents indicate that the reasoning behind the difference in approach to Tier 5 migrants and STS was that as STS “are present in the UK for a much longer time compared to those utilising the Tier 5 route, there is less pressing need to provide them with a route to vary their leave in a quick manner.” They stated that it is “considered reasonable to require them (STS) to leave the common travel area and seek re-entry via a manned control point where a Border Force Officer could grant the correct type of leave to enter. This approach is in line with the requirements placed upon individuals who arrive at the UK border prior to their entry clearance validity, and who are granted leave to enter as a visitor.”

**8.37** There was, however, provision for leave to be varied via a variation of leave letter, which can be issued by BFOs where it can be established that an officer was at fault or there are

safeguarding issues around child students travelling outside of the UK in order to re-enter. The Home Office introduced this measure in recognition of the fact that it “may not always be appropriate or proportionate” to require students to leave the CTA.

**Figure 8:** In-country process for varying leave of STS who use the gates in error in exceptional circumstances



**8.38** This provision was not exercised regularly. A Home Office document indicates that 4 of these letters were issued as of July 2019 and that since the B5JSSK expansion, around 100 students had been required to leave the CTA and re-enter the UK. The same document stated that “if we were to issue variations of leave to all students who use the ePassport gates in error, this would disincentivise educational institutions from enforcing the requirements to see an Officer” and that “Anecdotal evidence from educational institutions also suggests that short term students generally plan to visit continental Europe for at least a weekend trip already if studying in the UK for over 6 weeks”.

**8.39** It is clear from Home Office documents that the processes put in place for STS were never considered to be the preferred options. They were short- and medium-term solutions to a problem which could only be resolved by creating a new Statutory Instrument (SI) to grant entry to STS on the same conditions as visitors. This option was identified in a Home Office document dated 4 March 2019, prior to the extension of use to B5JSSK nationals. As of 1 December 2020,<sup>49</sup> the short-term study route has been transposed into the Visitor rules. This means that students coming to the UK for up to 6 months are now permitted to use the gates to enter the UK, instead of having to see a BFO to receive an endorsement in their passport.

## Consequences of the B5JSSK expansion

**8.40** The Home Office identified several consequences arising from the expansion of use to B5JSSK nationals. An April 2020 interim draft benefits realisation report by Home Office Analysis and Insight (HOAI) team listed them as:

- “• a drop in Premium Service income – RTS and Fast track scheme income declined by 95% and 40% respectively in the latter half of 2019 compared to the same time in 2018.
- Increased NHS debt – Between June and December 2019, NHS debt for the B5jSSK cohort increased by 10% compared to the same period in 2018.

<sup>49</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/928756/CCS207\\_CCS1020373376-002\\_Explanatory\\_Memorandum\\_to\\_HC\\_813\\_PRINT\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928756/CCS207_CCS1020373376-002_Explanatory_Memorandum_to_HC_813_PRINT_.pdf)

- Decreased CT referrals – Total referrals dropped 5% in 2019 with B5JSSK referrals down 48% compared to 2018.
- Significant drop in B5JSSK refusals – The largest YoY change was seen in August 2019, where only 1.1 refusals per 10,000 were recorded compared to 2.8 per 10,000 in 2018.
- The lack of tracking of criminality in the B5JSSK cohort by IE – IE do not track B5JSSK criminality as they have limited removal powers for non-visa nationals.
- Perception of a reduction in service to UK nationals using the ePassport gates.”

- 8.41** Inspectors asked the Home Office for details of any further analysis of the effect of these consequences and for details of any changes to the operation or management of the gates introduced to mitigate these effects. The Home Office response did not detail any changes to the operation of the gates or their management. It did, however, elaborate on the reasons behind the unintended outcomes.
- 8.42** The drop in premium service income was attributed to the fact that the majority of RTS members were from the B5JSSK countries and as they could now use the gates as a matter of routine, there was no longer any benefit in them continuing to use the scheme. Similarly, the Home Office stated that the drop in fast track/premium service passengers could be attributed to the fact that B5JSSK nationals could now use the gates without having to become a member of a paid for service.
- 8.43** The Home Office said that “NHS abuse is not easily identified at the PCP and safeguarding against accruing debt also falls to mechanisms and processes that are the responsibility of NHS Trusts. Improvement in detecting NHS debtors is not solely reliant on random intentions testing of individuals at the PCP, [Redacted] some NHS debt data is available to BF front-line staff. [Redacted]
- 8.44** The Home Office stated that the drop in Counter Terrorism (CT) referrals within the B5JSSK cohort could be partially attributed to the overall decrease in CT referrals more generally. Total CT referrals dropped by 5% from 2018 to 2019. The Home Office said it was confident that “nationals from the B5JSSK cohort do not present any greater threat to UK national security than other nationalities who can benefit from eGate eligibility” and that “colleagues from the security and policing agencies were consulted” ahead of the B5JSSK expansion. Although they “acknowledged that the change would reduce the ability of Border Force and CT Policing to detect previously unknown threats at port”, they were “content with the proposal (to extend use to B5JSSK nationals)”.
- 8.45** The Home Office stated that the reduction in refusals of B5JSSK nationals should be set in the context of an overall increase in the numbers of refusals at the border in 2019 (6%). It said that “the reduction in the numbers of individuals from B5JSSK nationalities being refused may be because this cohort receive less scrutiny as a result of their use of ePassport gates”. It also said that “e-Passport gate expansion was progressed in the knowledge (including in advice to Ministers) that there would be an impact on B5JSSK port refusals from reduced intentions testing and questioning an individual’s credibility. The risk posed by these refusals was still considered low.” It went on to state that the overall increase in refusals at the border could suggest that allowing B5JSSK nationals to use the gates has allowed officers to focus their attention on other cohorts of arrivals who may be higher risk. The Home Office suggested that this could be seen as the extension of use acting “as intended” in this regard.

- 8.46** Regarding the lack of criminality tracking by Immigration Enforcement (IE) of the B5JSSK cohort, the Home Office said that “Due to the length of time it takes to achieve convictions (for example, we think roughly two years when conviction time lags have materialised), this impact has yet to be assessed with the Police/or the Ministry of Justice”.
- 8.47** The Home Office explained that to measure the impact of the extension of use to B5JSSK nationals by satisfaction levels across cohorts, Home Office Analysis and Insight (HOAI) team conducted surveys with ePassport gate users pre-expansion and intended to do the same post-expansion. Due to the COVID-19 pandemic, it was not possible to survey in the same way. HOAI were still able to survey at Manchester and Heathrow airports and were able to establish a link between customer satisfaction and queue times but also found that satisfaction was dependent on a number of factors such as passenger demographic, airport size, infrastructure and seasonality. As their internal research was not complete, HOAI did not elaborate further on the satisfaction levels of UK nationals post B5JSSK expansion.

### Staff perceptions of the B5JSSK expansion

- 8.48** Border Force Officers (BFOs) and some Senior and Higher Officers told inspectors about the perceived risks of passengers from the B5JSSK cohort, in particular Americans, using the gates. They noted that pre-expansion they had refused entry to significant numbers of American nationals as they were not satisfied that they were genuine visitors or because they had concerns about their mental health. There was concern that these issues were no longer being identified.
- 8.49** One Higher Officer (HO) told inspectors that officers “now miss a lot of cases that would have been picked up if these passengers had to go through the desk”. They were concerned that the extension of use was “described as low risk” but that their port had seen a lot of refusals before the extension and now saw far less.
- 8.50** Another HO told inspectors that “You can’t know the risk, there could be people with mental health concerns, could be national security risks, could be on the WI for another country”. Inspectors also heard that “passengers see the expansion as an opportunity to circumvent engagement with an officer” (meaning that the gates provide a means by which they do not need to speak to an officer), and that “passengers who are not genuine visitors have more chance of getting through the gates, fewer Americans have been picked up since the expansion”.
- 8.51** Senior staff spoke of a “cultural issue” among staff regarding the perception of the risk that B5JSSK nationals present. A Regional Director told inspectors that “Border Force have been dealing with a cultural issue that had traditionally meant spending a lot of time trying to overturn a visa decision or refusing a US national as a non-genuine visitor”. They said that Border Force should “focus on higher harm” and that “B5JSSK expansion has helped advance the cultural shift” away from spending a lot of time and effort on cohorts that are deemed to present a low risk to the immigration control.
- 8.52** Another Regional Director said that “documentation provided in advance of the expansion indicated that B5JSSK nationals were low risk” but that there was “frontline concern” about the cohort using the gates. Another told inspectors that “all Officers have a different view on this, those that have been in Border Force a long time will talk about Australians and Americans”. They went on to say that “prior to the gate expansion the largest number of refusals was Americans, but a lot of analysis was done at a national level which showed that these were

mostly subjective cases". The B5JSSK expansion provided an opportunity to look at this "in a more nuanced way" which had led to "casework changing and being more focused on other things."

- 8.53** Inspectors considered that the clear disconnect between the views of managers and operational staff demonstrated a need for further and better communication of the risk that B5JSSK nationals present, in order to increase operational staff understanding of the risks posed by this cohort.

## 9. Inspection findings: Identification of vulnerable passengers

### The Home Office definition of vulnerability

- 9.1** While “protect[ing] vulnerable people and communities”<sup>50</sup> remains one of the Home Office’s 7 priorities, previous ICIBI inspections have recognised that the Home Office finds it challenging to define vulnerability.
- 9.2** ‘An inspection of the Home Office’s approach to the identification and safeguarding of vulnerable adults’ (February- May 2018)<sup>51</sup> documented this difficulty but reported on the (now withdrawn) Home Office ‘Single Departmental Plan’<sup>52</sup> that referred to various categories of people who, by inference, the Home Office regarded as vulnerable. These were:
- “• victims of female genital mutilation (FGM), forced marriage, or violence against women and girls
  - children, including via online exploitation and abuse
  - people suffering mental health crises
  - survivors of domestic abuse
  - victims of modern slavery and other forms of immigration crime
  - refugees and asylum seekers in need of protection
  - victims of hate crime
  - those exposed to extremism”
- 9.3** The Home Office updated its ‘Single Departmental Plan’ on 27 June 2019.<sup>53</sup> The new plan makes no reference to specific indicators or definitions of vulnerability other than to state under the sub-heading of “how we will do this”:
- “Identify and safeguard vulnerable people to protect victims of trafficking, modern slavery, detainees and children at risk of abduction (contributes to SDG [Sustainable Development Goals] 5, 8 and 16).”<sup>54</sup>
- 9.4** The annual inspection of ‘Adults at Risk in Immigration Detention’ (2018- 19)<sup>55</sup> contained the specific recommendation that the Home Office should:

---

50 <https://www.gov.uk/government/organisations/home-office/about>

51 <https://www.gov.uk/government/publications/an-inspection-of-the-home-offices-approach-to-the-identification-and-safeguarding-of-vulnerable-adults>

52 <https://www.gov.uk/government/publications/home-office-single-departmental-plan/home-office-single-departmental-plan#protect-vulnerable-people-and-communities>

53 <https://www.gov.uk/government/publications/home-office-single-departmental-plan/home-office-single-departmental-plan--3>

54 The Sustainable Development Goals (SDGs), also known as the Global Goals, were adopted by all United Nations Member States in 2015 as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030: <https://www.undp.org/content/undp/en/home/sustainable-development-goals.html>

55 <https://www.gov.uk/government/publications/annual-inspection-of-adults-at-risk-in-immigration-detention-2018-19>



“Review the various definitions and indicators of risk and vulnerability used throughout Home Office guidance, processes and forms... (not solely related to Adults at Risk guidance) and in the Detention Centre Rules and Detention Services Orders, and (with input from relevant experts) ensure that they are clear, consistent and comprehensive, and that all staff (Home Office, supplier and prison) are fully trained to understand and comply with them.”

- 9.5** This recommendation was ‘partially accepted’ by the Home Office, which stated in its response to the inspection report in April 2020:<sup>56</sup>

“We have considered this recommendation in relation to the Borders, Immigration and Citizenship System (BICS) and have partially accepted on this basis. In this context, there is already work under way within BICS to look at vulnerability and safeguarding definitions and indicators. This is a significant undertaking because of the large number of vulnerability indicators used across BICS, and more widely, some of which are only relevant to specific areas. In the first instance, we are seeking to provide a framework for the level of intervention expected from our staff. We are also working on a list of indicators, with a short definition of their meaning which we will seek to get agreed across BICS and implemented to use from Spring 2020 onwards. We will then consider how the framework and the definition apply to any relevant guidance and training, including whether new products are needed, or existing products should be amended.”

As of April 2021, this list of indicators and definitions is still to be completed.

## **Border Force strategy to identify vulnerability at the gates**

- 9.6** Inspectors asked to see Border Force’s strategy to identify vulnerable passengers at the gates. The Home Office provided the following reply:

“Border Force are committed to ensuring the safety and welfare of passengers coming through control points. To this end, all Border Force officers complete mandatory safeguarding training as well as completing training to ensure the welfare of children in accordance with The Children’s Act 2014 and Section 55 of the Borders, Citizenship and Immigration Act 2009.

Border Force additionally engage roving officers. The primary objective of deploying a roving officer is to prevent trafficking and provide safeguarding assurances by heightening security around ePassport gates. For terminals with six or more ePassport gates there is a mandatory requirement for a Roving officer to be deployed at all times. Where there are more than ten ePassport gates, it is recommended 2 or more Roving officers are deployed to man the ePassport gates.”

## **The Office of the Children’s Champion**

- 9.7** In May 2016, the Border Force Safeguarding Director commissioned the Office of the Children’s Champion (OCC)<sup>57</sup> to review the gates operated at Heathrow Terminal 5 (and subsequently 5 other UK airports). The purpose of the review was to advise on strengthening child safeguarding arrangements in place at the time. The key findings focused on reviewing the

---

<sup>56</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/882002/Response\\_to\\_the\\_annual\\_inspection\\_of\\_adults\\_at\\_risk\\_in\\_immigration\\_detention.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/882002/Response_to_the_annual_inspection_of_adults_at_risk_in_immigration_detention.pdf)

<sup>57</sup> The Office of Children’s Champion (OCC) is a team of 6 Home Office staff. OCC sits within the Public Protection Directorate.



purpose of, guidance and training for the roving officer role, considering the use of routinely using 2 roving officers, considering the information provided to passengers in arrivals halls, providing basic safeguarding training to airport staff where they provide a supporting role, and managing the time spent by monitoring officers at the gates to ensure their concentration levels do not wane.

- 9.8** The OCC highlighted staff unease in identifying child safeguarding and broader vulnerability issues:

“During the course of our visits we have noted a mix of staff views about children using ePassport gates. For many, there is a real scepticism that roving officers can positively contribute to the identification of child safeguarding, welfare, or vulnerability risks. It is essential staff recognise that there is no turning back from ePassport gates, so there needs to be a cultural shift which encourages them to believe they can make a difference.”

- 9.9** The OCC also drew attention to the difficulty that BF had had in identifying child safeguarding risks as “while we have been told about officers identifying safeguarding risks in relation to vulnerable adults (particularly young Romanian women), we have not heard of or seen a single new example of a roving officer identifying a child at risk in recent months.”

- 9.10** The resulting report made 6 recommendations, mostly concerning guidance, training and numbers of staff members working at the gates. Border Force did not respond formally to the OCC, which is part of the Home Office, but there was email correspondence between DPS staff and the report’s authors. Border Force told inspectors that it was addressing some of the issues identified in its ongoing reviews of the roving and monitoring officer roles.

## The role of the roving officer in identifying vulnerability

### Roving officers at Heathrow Terminal 2

- 9.11** The role of the RO has expanded from the sole requirement to monitor children using the gates. In response to this wider border security role, Heathrow Terminal 2 has developed a dedicated team of 30 officers to perform the RO duty. Officers undergo a 3-day behavioural detection (BD) course which aims to train them to identify risks and threats (vulnerability, immigration, customs, criminality and CT) through observation of arriving passengers, casual and directed conversation and response evaluation. BD training is designed for teams of 2 officers working together, raising questions about its effectiveness where only one RO is on duty. The course is delivered by several police forces around the country.
- 9.12** ROs at Terminal 2 also take a one-day training course covering wider aspects of the RO role, including specific sessions on safeguarding and modern slavery (SAMS), counter terrorism (CT), customs, forgery detection, use of notebooks and recording information. This course was designed by BF with input from Special Branch.
- 9.13** BFOs at Terminal 2 were enthusiastic about the BD training and saw themselves as well-placed to identify vulnerable passengers. One BFO told inspectors:

“We are looking for anything out of the ordinary. Our main task is to look for SAMS<sup>58</sup> issues. We are the first line of defence. But it’s not just SAMS, it is also immigration, cash seizures, cigarettes, CT. The ROs are the only people who will spot these things at the gates.”

---

58 Safeguarding and modern slavery.

**9.14** Managers at Terminal 2 were also enthusiastic. One told inspectors that “It’s beneficial having a dedicated RO team, especially as they are BD trained. The understanding of the Officers of their role is much better.”

**9.15** In September 2019, the Home Office Analysis and Insight team carried out an exercise at Terminal 2 that sought to compare the performance of the dedicated and upskilled RO team with a non-dedicated, non-upskilled team of ROs from the same terminal. The trial measured 3 variables over a 3-week period:

- number of IS81 forms issued by ROs to passengers when they are detained at the border pending further investigations
- number of “significant interactions” (defined as “a time where an Officer meets a passenger and proceeds to more in-depth questions than the initial screening questions”) recorded by ROs (as IS81s were issued “relatively infrequently”)
- numbers of passengers that were approached (reviewers performed 27 one-hour observations of the ROs on duty where they measured how many passengers were approached)

**9.16** The review found that upskilled officers scored higher on each of the variables. Upskilled officers issued 17 IS81s as opposed to 3 by non-upskilled officers. Upskilled officers recorded 43 significant interactions (10 with minors) opposed to 18 (7 with minors) by non-upskilled officers. Upskilled officers approached 258 passengers as opposed to 82 by non-upskilled. The report states that analysts did not perform a significance test on these figures “due to having more observations of upskilled ROs, but this suggests that upskilled ROs approach more passengers than non-upskilled.” The report also states that approximately 50% of the interactions by both upskilled and non-upskilled officers were with passengers not eligible to use the gates for reasons of nationality.

**9.17** The report concluded that the results indicated:

- there was a benefit to upskilling ROs but it should be noted that some of this benefit may be due to the specialised nature of the Terminal 2 team
- there are additional benefits to the RO role beyond monitoring gate passengers in a safeguarding capacity “and that ROs have a role in intercepting passengers from a wider demographic beyond those who are eGate eligible”
- there may be a benefit to increasing the mandated number of ROs on duty at ports with more than 10 gates

This report will be considered as part of a wider BF review of the roving officer role that is due to be completed later in 2021.

## Monitoring officers

**9.18** At ports with 5 or less gates, there is no requirement for BF to deploy an RO, and the child safeguarding role is fulfilled by the MO and, where present, hosts. Their main role is to ensure that any child using the gates is accompanied by a responsible adult.

**9.19** The ‘ePassport gates: Standard Operating Procedure’ (SOP) states that the MO is required to acknowledge when a British, EEA, Swiss, or B5JSSK passport-holding child aged 12 to 17 attempts to use the gates, by responding to an automated pop-up message and pressing a

green 'yes' button on the monitoring screen. The gate does not open without this response. If the MO has concerns regarding a child using the gates, s/he should press the 'no' button on the age warning pop-up message. The gate will reject the passenger who will be referred to the referrals officer for further examination.

- 9.20** The 'ePassport gates - monitoring officer - best practice guide' contains a list of 10 "dos and don'ts" that monitoring officers should follow at ports with 5 gates or less. While these regulations are all perfectly sensible, inspectors had some concerns as to whether an MO can realistically carry out these tasks while simultaneously watching 5 gates on the monitoring screen.
- 9.21** Inspectors considered that any safeguarding role carried out by MOs was likely to be perfunctory at best. It is not practical for an MO to engage with passengers who are using the gates. Inspectors spoke to MOs at Glasgow, which only has 5 gates, and when they were asked what the main responsibilities of the role were, safeguarding was not mentioned. They told inspectors that their main duties consisted of:

"Ensuring that the gates are working, and people are moving. You have to check for tailgating. Checking that gates are functioning properly. You have to be very quick to reject them. You have to deal with hits and reports. If they are a 'stop' they get rejected. If they are a report, you have to make a record and report later that day."

## Is it possible to identify vulnerability at the gates?

- 9.22** The Home Office has a contradictory view of the gates in terms of identifying vulnerable passengers. In a 2018 announcement on the expansion of gates for use by B5JSSK nationals, the Home Office stated that gates would process passengers quickly and securely while allowing Border Force Officers to "focus on other priority work such as identifying potential victims of trafficking". On the ground however, Border Force recognises that it is precisely some of these EU nationals that present the greatest safeguarding concerns.<sup>59</sup>
- 9.23** A previous ICIBI inspection of Border Force operations at Glasgow and Edinburgh airports, published in October 2019<sup>60</sup> reported that ports closed their gates when they had concerns about vulnerability linked to certain flights, in order to ensure that all arriving passengers were seen by a BFO:
- "Glasgow occasionally closed the gates for "high risk" flights... 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."
- 9.24** Officers in Glasgow told inspectors that this was still the case, and that it was standard practice to close the gates to process passengers arriving from Bucharest. This is a concern reflected by the Home Office's Modern Slavery Unit (MSU).<sup>61</sup> MSU staff told inspectors "there is a theoretical concern that gates make it more difficult to identify vulnerable passengers" and

---

59 The ICIBI [inspection into the work of BF, IE and UKVI to identify, investigate, disrupt and procure perpetrators of modern slavery and human trafficking](#) noted the NCA's protectively-marked Quarterly Threat Update (QTU) which included JSTAC's assessment of the threat to the UK from MSHT. In Q2 2019-20 (July-September 2019),<sup>67</sup> JSTAC described the threat as "consistent". It noted that UK nationals continued to account for the highest number of referrals into the NRM, followed by Albanians, Vietnamese and Chinese. Of the top 10 foreign nationalities, 9 were non-EU (Romanians were the exception).

60 <https://www.gov.uk/government/publications/an-inspection-of-border-force-operations-at-glasgow-and-edinburgh-airports>

61 Part of the Home Office's Serious and Organised Crime Group, MSU sit within the Tackling Slavery and Exploitation Directorate and are responsible for developing policy and legislation on modern slavery.

that they “also recognise the potential concern that 12-17-year olds using the gates can be risky”, but they said that they had not “had capacity to do any detailed research into this”.

**9.25** Stakeholders have more than theoretical concerns however and recognise this as the principal weakness in the gates system when compared to the traditional PCP. A number of stakeholders working in the area of modern slavery told inspectors that the lack of human interaction would make it more difficult to identify potentially vulnerable passengers at the gates.

**9.26** An official from one NGO which had looked at the gates operation told inspectors:

“We find that ePassport gates almost completely eradicates the safeguarding aspect. We find that the most effective way to monitor and investigate potential victims is with face to face time at desks. ePassport gates allow people to go by quickly and are often used to go through undetected... If safeguarding is the primary function, then ePassport gates shouldn’t be used at all.”

## Stakeholders’ views of the roving officer role

**9.27** Stakeholders highlighted how the gates make it more difficult to identify vulnerability but were keen to see the risks mitigated by providing safeguarding training for ROs and increasing the number of ROs deployed. One stakeholder told inspectors:

“In relation to the ePassport gates, it [the RO role] can either be really good or might not be effective at all. It depends on whether the RO has had safeguarding training. If someone in that role hasn’t engaged with safeguarding cases it might not be effective. I have seen it work well with officers who have been trained in safeguarding and behavioural detection. Officers need training and resources to do it well.”

Another stated:

“Training is important – Officers need to be fully equipped to perform in the role. There are usually only one or two Roving Officers working on the gates, there are a lot of gates – it is a difficult role. They probably don’t have the capacity to pick everything up. It is important to make sure that there are enough Roving Officers working for them to be able to make a difference.”

A third told inspectors:

“It is very hard to identify these issues, even at a desk. Are Officers in place as they should be? Have they had adequate training? Do they feel confident in their ability to identify these issues?... There are dedicated safeguarding and modern slavery teams and they have more training – but it appears that they work in a siloed way – I am not sure to what extent the knowledge of vulnerability issues is mainstreamed, particularly for Roving Officers.”

## Vulnerability training

**9.28** Since 2017, all new Border Force officers in public-facing roles have had to complete a 4-hour classroom-based training course on ‘Protecting the Vulnerable’ (PTV) as part of their core skills training. PTV training includes modules on legislation, guidance, responsibilities, behavioural indicators, and the response when a person has been identified as a potential victim of modern slavery (PVoMS). PTV training focuses on human trafficking and modern slavery; child

safeguarding; forced marriage and female genital mutilation (FGM). The training was designed with input from the Home Office Modern Slavery Unit, the Public Protection Directorate (PPD)<sup>62</sup>, the Salvation Army<sup>63</sup> and the Single Competent Authority.<sup>64</sup>

- 9.29** Border Force National Safeguarding & Modern Slavery runs a suite of Protecting the Vulnerable (PTV) training courses for all frontline officers and managers; and a more intensive course for specialists. The Office of the Independent Anti-Slavery Commissioner (IASC) reviewed the specialists' course content and the IASC has provided a keynote introduction for it. 900 managers have been trained. The Home Office told inspectors that the delivery plan had been impacted by a mixture of coronavirus pandemic limitations, by preparations for the UK's departure from the EU, and changing predictions for the impacts of 'post COVID' passenger levels.
- 9.30** A senior manager working in safeguarding and modern slavery explained that the PTV training had been rolled out to managerial grades first rather than to BFOs (whose role it is to identify vulnerable passengers) because "we felt that they hadn't done training on vulnerability for a while. Ultimately it is them who take all the vulnerability referrals and authorise detention or onward referral."
- 9.31** Pending the further roll out of the PTV training, BFOs rely on 4 modules of vulnerability e-learning that they are required to undertake every 2 years, which each take around 1 to 2 hours to complete. These are:
- keeping children safe
  - modern slavery and the NRM
  - recognising and preventing FGM
  - awareness of forced marriage
- 9.32** Staff completion rates for the e-learning was low. Evidence provided by the Home Office showed that most staff had not completed most of the training.

---

62 The PPD develops policy and legislation on child protection, forced marriage and female genital mutilation.

63 The Salvation Army holds a government Victim Care Contract to provide support and assistance to adult victims of modern slavery through the National Referral Mechanism.

64 Part of the Home Office's Serious and Organised Crime group, the SCA is a unified body making decisions on National Referral Mechanism (NRM) referrals for all potential victims of modern slavery, regardless of their nationality.

Figure 9

## Staff completion rates of vulnerability e-learning as of 20 October 2020

BF Region	Airport	Head count <sup>*65</sup>	Keeping children safe	Recognising and preventing FGM	Forced marriage <sup>***</sup>	Modern slavery and NRM <sup>***</sup>
North	Glasgow	97	46	44	3	8
	Manchester	368	135	182	18	21
	Newcastle	62	39	27	20	24
	Edinburgh	153	31	48	33	37
Central	Luton	146	62	64	12	12
	Stansted	287	48	64	1	155
	London City	40	29	26	0	26
	Birmingham	143	127	127	127	127
	East Midlands <sup>**</sup>	42				
Heathrow	T2	173	58	57	6	0
	T3	166	28	20	0	0
	T4	169	29	23	9	6
	T5	188	69	50	0	0
South	Gatwick	633	450	405	387	396
	Bristol	86	67	66	0	3
	Cardiff	32	26	10	2	3
Juxtaposed	Brussels	45	16	6	1	3
	Paris/Lille	42	30	31	21	21
<b>Total (%)</b>		<b>2,872</b>	<b>1,290 (45)</b>	<b>1,250 (44)</b>	<b>640 (22)</b>	<b>842 (29)</b>

\* as of June 2020.

\*\* East Midlands completion figures are combined with Birmingham.

\*\*\* The Home Office stated that as these courses were only introduced in July 2020, completion numbers were lower.

**9.33** Inspectors were told that BFOs had been able to complete vulnerability e-learning between September and December 2020 when passenger numbers were lower and provided more time for learning and development. Inspectors requested updated completion rates for the 4 modules of vulnerability e-learning as of December 2020. While the Home Office had been able to provide complete figures in September 2020, it now said it was unable to collate completion results for the Forced Marriage e-learning. Total completion rates for the other 3 modules were as follows: Keeping children safe 80.5%; Modern Slavery for First Responders 46.6%; Recognising and Preventing FGM 71%.

**9.34** While BF management were confident that the new PTV training would raise awareness of the key vulnerability themes, current vulnerability training for BFOs is narrowly focused. Staff at different ports spoke of vulnerability chiefly in terms of women from Eastern

65 In its factual accuracy response, the Home Office revised these figures as follows: Stansted 229, London City 35, Birmingham 117, E Midlands 39.

Europe, particularly Romania, being trafficked for sexual exploitation. They referred to the same operations and identification of the same potential victims when giving examples of the successes that BF had achieved. This is clearly a prominent and pernicious 'category' of vulnerability, the victims of which staff were rightly proud to have identified.

## Safeguarding and Modern Slavery (SAMS) network

- 9.35** The Safeguarding and Modern Slavery (SAMS) network is a network of 500+ BF officers that is present at all ports across the UK, and whose purpose is to provide expert advice and support in identifying and safeguarding potential victims of modern slavery to BF officials at port. While not a mandated or ring-fenced duty, it is hoped that ports have at least one SAMS officer on duty at all times. SAMS officers have all undergone a 3- or 4-day training course in safeguarding and modern slavery. Any Border Force Officer, Higher Officer or Senior Officer can apply to join the network. The SAMS role is carried out alongside an officer's rostered duties. This means that officers working as a roving officer, a referrals officer or a monitoring officer may also be SAMS officers. There is an expectation that there will always be a SAMS-trained officer on duty from whom other officers can seek advice or refer cases of concern to.
- 9.36** The Heathrow region risk register acknowledges that a shortage of SAMS officers might lead to vulnerable passengers remaining unidentified. Officers at one port told inspectors that there is not always a SAMS officer on duty.

## Vulnerability identification data

- 9.37** Border Force data does not record data on whether a vulnerable passenger is identified at the ePassport gates or at the PCP. Prior to 2018, identification data of vulnerable passengers was collated at a regional level, with no central BF record of vulnerable passengers identified at individual ports. The Home Office told inspectors:
- "The data process for Potential Victims of Modern Slavery has changed over the years. For 2017/18 the data has been taken from regional returns which only show summary numbers by region. From April 2018 the process changed, and more details are available including the nationality and port location. The type of exploitation is not shown in the data sets PRAU [Performance Reporting and Analysis Unit] holds."
- 9.38** Of concern is the fact that Border Force only records the identification of potential victims of modern slavery (PVoMS). There is no centrally held record of the identification of other categories of vulnerability. This makes it impossible to evaluate the role of roving officers, monitoring officers or hosts when it comes to safeguarding children, for example.
- 9.39** Border Force argues that it is very difficult to identify PVoMS at port. In response to a further evidence request, the Home Office told inspectors:
- "At the border most people are travelling to the UK with the hope of a better life or for a specific, non MSHT purpose. Exploitation has generally not yet taken place and if people have been duped into travelling to the UK and later find themselves in a position of exploitation this will often not be evident on arrival at the border. Interceptions are however made by Roving Officers at the egates on the basis of behavioural indicators and any recognised vulnerabilities and then referred to a PCP officer/SAMS specialist as necessary."



**9.40** Border Force provided data on the identification of PVoMS at gate locations, highlighting that figures for 2020 were affected by the steep reduction in passenger numbers due to the COVID-19 pandemic.

**Figure 10**  
**Identification of PVoMS by gate location and eligibility to use the gates (EU/UK, B5JSSK or Rest of World (RoW)), 2018-2020**

ePassport gate location	2018-19			2019-20			2020-21*			Total
	EU/UK	B5JSSK	RoW	EU/UK	B5JSSK	RoW	EU/UK	B5JSSK	RoW	
BHX	2	0	4	0	0	18	0	0	0	24
Brussels**	5	0	4	0	0	0	0	0	2	11
CWL	0	1	0	0	0	0	0	0	0	1
EMA	1	0	0	0	0	1	0	0	0	2
EDI	9	0	67	14	0	9	8	0	0	107
LGW N	0	0	6	0	0	10	8	0	9	33
LGW S	0	0	3	0	0	6	0	0	0	9
GLA	94	1	2	40	0	0	3	0	0	140
LHR	1	0	0	0	0	0	0	0	2	3
LHR T2	8	1	24	12	1	16	5	1	2	70
LHR T3	0	0	26	0	0	25	0	0	0	51
LHR T4	10	0	34	11	0	47	0	0	0	102
LHR T5	9	3	36	3	0	28	1	1	8	89
LTN	7	0	3	17	0	4	7	0	1	39
MAN T1	10	1	4	10	0	44	16	0	0	85
MAN T2	0	0	0	2	0	14	0	0	0	16
MAN T3	6	0	0	5	0	2	2	0	1	16
Paris**	6	0	1	5	0	3	0	0	0	15
STN	24	4	17	20	1	13	13	0	2	94
N/K	1	0	2	0	0	4	0	0	0	7
<b>Total</b>	<b>193</b>	<b>11</b>	<b>233</b>	<b>139</b>	<b>2</b>	<b>244</b>	<b>63</b>	<b>2</b>	<b>27</b>	<b>914</b>

\*To December 2020.

\*\* Juxtaposed controls.

\*\*\*Bristol (BRS), London City (LCY) and Newcastle (NCL) Airports have nil returns for these periods.

**9.41** The data shows that nationally, just over half (55.2%) of identified PVoMS come from the “rest of the world” (nationals of those countries that are not eligible to use the gates), but EU and UK nationals (who are eligible to use the gates) make up 43.2% of the total. B5JSSK nationals, who became eligible to use the gates in April 2019, make up 1.6% of identified PVoMS.



- 9.42** It is remarkable that BF at Glasgow Airport has identified so many more EU/UK PVoMS than any other airport, including Heathrow. 98% of those identified were EU or UK nationals. This can be explained in part by the fact that the majority of flights into Glasgow originate in the EU. However, BF in Glasgow targets particular flights that are considered high risk, often closing the gates entirely to ensure that all passengers are spoken to by an officer. Staff at Glasgow told inspectors that they were aware that success in identifying PVoMS had caused some displacement to Edinburgh Airport.
- 9.43** Luton (79%) and Stansted (60%) also identify a high proportion of EU/UK nationals. Heathrow identifies a much higher proportion of “rest of world” PVoMS (78%).
- 9.44** The low number of B5JSSK nationals identified as PVoMS (1.6% of the total) suggests that this cohort does present a low risk. However, even lower numbers since they were allowed to use the gates could suggest that some cases are now being missed.

Figure 11

**B5JSSK nationals identified as PVoMS and traffickers May 2018 to April 2019 (pre-B5JSSK expansion) and May 2019 to April 2020 (post-expansion)**

	May 2018- April 2019	May 2019- April 2020
<b>Total PVoMS (CID)</b>	10	3
<b>Total PVoMS (non-CID)*</b>	1	0
<b>Total traffickers (CID)</b>	10	3

\* Non-CID PVoMS refers to a case which was not recorded on CID and was a manual data return from BF.<sup>66</sup>

- 9.45** In the original data response provided by the Home Office, inspectors noticed that identification data for PVoMS and traffickers was identical, taking place at the same ports in the same months. Inspectors were concerned that BF staff at ports could be recording victims as both PVoMS and traffickers, or that in all cases (whilst unlikely to be the case), the victim and the trafficker had both been identified. Inspectors asked the Home Office for clarification on this point but this was not provided.

## Project Aidant

- 9.46** BF staff at ports across the country organise and collaborate on a number of operations and special projects centred on identifying vulnerability. Chief amongst these is ‘Project Aidant’, a series of multi-agency operational intensifications to tackle modern slavery and human trafficking led by the National Crime Agency (NCA).
- 9.47** Project Aidant has a regional focus and agencies have flexibility in how it operates in their areas. At airports, Aidant typically involves the targeting of arriving flights deemed to be of high risk. BF immigration and customs staff and the NCA and police are all routinely involved. Where practical, the gates are often turned off. Senior BF staff told inspectors that Aidant had produced impressive results with many PVoMS and traffickers identified.
- 9.48** BF staff at all 5 of the ports examined in this inspection confirmed that they had participated in Project Aidant on multiple occasions during the previous 12 months.<sup>67</sup> Staff agreed that the project was effective at identifying both PVoMS and traffickers.

<sup>66</sup> Case Information Database is the Home Office main immigration database.

<sup>67</sup> See the ICIBI’s report on an [inspection of the work of Border Force, Immigration Enforcement, and UK Visas and Immigration to identify, investigate, disrupt and prosecute perpetrators of modern slavery and human trafficking](#) for more information on Project Aidant.

- 9.49** Inspectors sought to understand how BF learnt from Project Aidant in terms of the operation of the gates. In a response to the inspectors' preliminary evidence request, the Home Office confirmed that the "ePassport Gates operation has not changed as a result of Op Aidant. ePassport Gates and their expansion is driven primarily by port infrastructure and passenger numbers and is led outside of the SAMS arena."

## Victim navigator

- 9.50** BF staff at Glasgow Airport can also rely on a "victim navigator" for assistance in identifying and safeguarding vulnerable passengers. Modern slavery NGO Justice & Care has experience in operating the victim navigator project with UK police forces and started working with Border Force at Glasgow Airport in December 2019.
- 9.51** The victim navigator assists BF staff in national and local intelligence, training, and with safeguarding PVoMS through independent victim support. The aim of the role is to bridge the gap between the police and victims, allowing the police to carry out their investigations while the navigator focuses on the victims' needs. Having an expert who potential victims will not identify directly with BF builds more trust with the victim and creates a willingness for them to engage with the referral process.
- 9.52** Staff at Glasgow were enthusiastic about the Victim Navigator project. All felt that it had increased their awareness of modern slavery and was a useful safeguarding resource, bringing a level of expertise, practical experience and contacts that BF lacked. The project was not directly linked to the use of the gates and much of the identification work revolves around intelligence-led targeting of individual flights when the gates are closed.
- 9.53** The victim navigator role is funded by Justice & Care who will evaluate its effectiveness and decide on any further roll out after reviewing the project at the end of 2021. The Home Office informed inspectors that "it is a SAMs initiative rather than specifically linked to the use of ePassport Gates. The Border Force SAMS national team will be monitoring the success of the pilot."<sup>68</sup>

## The impact of Brexit on vulnerability and labour exploitation

- 9.54** The UK's withdrawal from the EU means that EU nationals no longer have the automatic right to live and work in the UK, but they will be able to travel to the UK for periods of up to 6 months without requiring a visa. EU nationals that have not applied to the EU Settlement Scheme will be required to apply for work visas to take up employment in the UK. Salary thresholds mean that many will not qualify, especially for low paid or casual employment. Stakeholders believe that this could drive low paid workers into the arms of criminal trafficking gangs who will be able to exploit illegal workers. As the Human Trafficking Foundation has pointed out:

"Current entry check systems are ineffective and inadequate for identifying both traffickers and potential victims. In particular, the use of ePassport gates presents a significant problem. ePassport gates rely on the watchlist in order to flag suspected traffickers but will

---

<sup>68</sup> In its factual accuracy response, the Home Office stated, "The pilot is subject to regional review with Nationals SAMS oversight... Justice and Care are now piloting a concept where the Victim Navigator in Scotland will support both Border Force and Police Scotland and, with this in mind, propose to run the pilot for another up to two years. Justice and Care will be looking at the progress every six months and liaise with both teams on development needs or impact."

not identify anyone not already marked. This process will become even more ineffective if access to EU data is lost.”<sup>69</sup>

- 9.55** The UK’s departure from the EU has therefore created a potential new cohort of illegal workers who will continue to enjoy visa-free movement to the UK. The UK has also lost access to EU criminality data systems, creating a risk that high-harm individuals could enter the UK via the gates or the PCP. The Home Office told inspectors that whilst the UK lost access to Schengen Information system (SIS II) data, there is guidance on Horizon which advises staff on Interpol notifications which appear on the watchlist to identify persons involved in criminality. This was updated at the same time as SIS II guidance was removed.
- 9.56** Inspectors asked the Home Office about the main threats and opportunities to the ePassport gates system presented by the UK’s withdrawal from the EU. Trafficking and modern slavery were not mentioned in its response. One of the opportunities listed was the increased use of gates by EU nationals who would no longer be able to travel using national ID cards, thus meaning that Border Force Officers would speak to fewer EU passengers in future. This is because national identity cards from some current EU member states do not meet recognised International Civil Aviation Organisation passport standards, are time consuming for Border Force officers to manually process at the PCP and cannot be read by e-Passport gates.
- 9.57** When asked how BF planned to deal with a potential increase in trafficking of EU nationals, a senior BF official told inspectors, “we examine everyone who arrives. They will still be going through the e-gates. Maybe it’s a chance to speak to more people”. It was not clear to inspectors how this would be achieved.

## Public Sector Equality Duty (PSED) responsibilities

- 9.58** The Public Sector Equality Duty came in to force in April 2011 as part of the Equality Act 2010, requiring public authorities to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 when carrying out their functions.<sup>70</sup> This is commonly evidenced by the completion of policy equality statements (PES) or equality impact assessments (EIAs) when a new policy or function is introduced.

## Equality Impact Assessments (EIA)

- 9.59** The equality impact assessment (EIA) for the extension of gate use to 12-17-year olds, produced in May 2016, highlighted that age discrimination is contrary to the Equality Act 2010. However, this discrimination is permissible if there are objective reasons for the age discrimination. In this case, the statement asserts that there are reasonable grounds to limit the extension to those aged 12 and above based on IT limitations, height restrictions and the judged ability of a child under 12 being able to successfully use a gate.
- 9.60** The equality impact assessment for the extension of gate use to B5JSSK nationals found that the extension would affect direct discrimination on the ground of nationality under the Equality Act 2019. The assessment provided to inspectors was not dated or signed but the Home Office said it had been signed off by ministers on 10 January 2019. The assessment said that, “this discrimination will be authorised by the regulations made under the Immigration Act 1971 providing for nationals of Australia, Canada, Japan, New Zealand, Singapore, South Korea and the United States to be able to obtain leave to enter by passing through an ePassport gate.”

---

<sup>69</sup> [Taking Back Control of our Borders? The impact on modern day slavery. Human Trafficking Foundation, November 2020.](#)

<sup>70</sup> See: [Public sector equality duty - GOV.UK \(www.gov.uk\)](#)

- 9.61** FRONTEX, the European Border and Coast Guard Agency, produced best practice guidelines on the design, deployment and operation of automated border control (ABC) systems (which includes ePassport gates) in 2015. In relation to passengers with disabilities, it recognised that ABC systems did not provide full access for all travellers with disabilities, especially “persons with limited mobility, such as wheelchair users, those who are unable to stand unaided, visually impaired or those who cannot provide the required biometric”. It recommended that the design of ABC systems should consider all categories of persons with disabilities and that they should be “adapted to cater for them to the greatest possible extent (keeping in mind the business case for the implementation). Therefore, the ABC systems’ ergonomics, dimensions, location and the environmental conditions SHOULD be considered with a special focus on the needs of travellers with disabilities.”
- 9.62** The EIA for the extension of gate use to B5JSSK nationals described how 3 ports, Heathrow Terminal 2, Gatwick North Terminal and Brussels, have one wider gate each “which provides for access by wheelchair users/those with a disability which would otherwise limit their ability to stand and/or walk. Then such persons would be able to benefit from their use when crossing the UK border.”
- 9.63** The solution for passengers with disabilities who are unable to use the gates is to use the medical assistance desk at the airport, which is permanently manned. Border Force staff said that queues at the medical assistance desk were often shorter than those at the gates.
- 9.64** Home Office guidance on the Public Sector Equality Duty (PSED) and Equality Impact Assessments states that the “PSED is a continuing duty and the policy should be kept under continuing review. In practice, this means that when we review the policy, whether this takes the form of a regular light-touch review or a root-and-branch re-think, we should review the PSED too.” It continues, “You should insert the date on which the EIA will be reviewed. How often the PSED is reviewed and, if necessary, the EIA updated, will depend on each situation.” Inspectors noted that the PES for the expansion of use to 12-17-year olds included a review date of “Summer 2016” (but noted that this did not take place), and that the PES for the B5JSSK expansion did not include a review date.
- 9.65** The guidance also states, “But when we are not actively making changes to the policy, and it is in continuous implementation, it is still incumbent on us to be considering equalities issues. Keeping the policy and PSED under review is an active process and requires keeping a watchful eye on developments which may affect the equalities impacts of the policy.” Border Force Operational Policy told inspectors that they had not been involved in drafting the EIAs as that responsibility sat with BICS Policy. BICS Policy told inspectors that the EIAs would be reviewed only if there was a policy change. Inspectors were not provided with any evidence to suggest that the PSEDs relating to disability issues around current use of the gates and gate expansion were being kept under review.
- 9.66** Inspectors noted the comment in the PES for the expansion of use to B5JSSK nationals which stated that the Home Office considered the installation of wider accessible gates “upon request from ports”, rather than insisting that they should be installed as a matter of course at all gate locations. This was also raised in stakeholder submissions in response to the call for evidence, with an industry body noting that there were “no facilities for passengers who need assistance to access e-gates.” One airport operator stated:

“e-Gates should be designed so they can be used by independent wheelchair users, passengers with reduced mobility and adults of short stature. They should be accessible

both by width, biometrics, the height of passport readers and scalability of cameras. How are BF ensuring that future gates will be inclusive?”

They also referenced problems experienced by blind or partially sighted passengers when using the gates.

- 9.67** Inspectors were told in February 2021 that the equality impact assessment for the Windows 10/Orchestra Services Platform upgrade was in draft format and would “be updated following findings from early adopter deployments at Gatwick and Heathrow in March 2021.” The draft refers to the installation of “a new, more accurate, facial recognition algorithm” and consultation had been undertaken with a range of stakeholders, including ABLE (the Home Office disability network). Initial consultations with the Border Force Diversity and Inclusion team meant the Home Office was satisfied “that the introduction of the new FR algorithm will not discriminate, directly or indirectly, against those with disabilities”.
- 9.68** The Senior Director of Systems and Change, who is also the diversity and equality champion for Border Force, stated that accessibility at the gates and the PCP had been discussed for both the travelling public and Border Force staff. He noted that space constraints in immigration halls were the biggest factor when considering the installation of wider gates but acknowledged that Border Force may not have paid enough attention to accessibility in the past as they were so focused on rolling out the gates. He stated that when the next generation of gates was looked at, they would “definitely have to make sure that accessibility is incorporated into any new deployment”.

# 10. Inspection findings: Measuring effectiveness

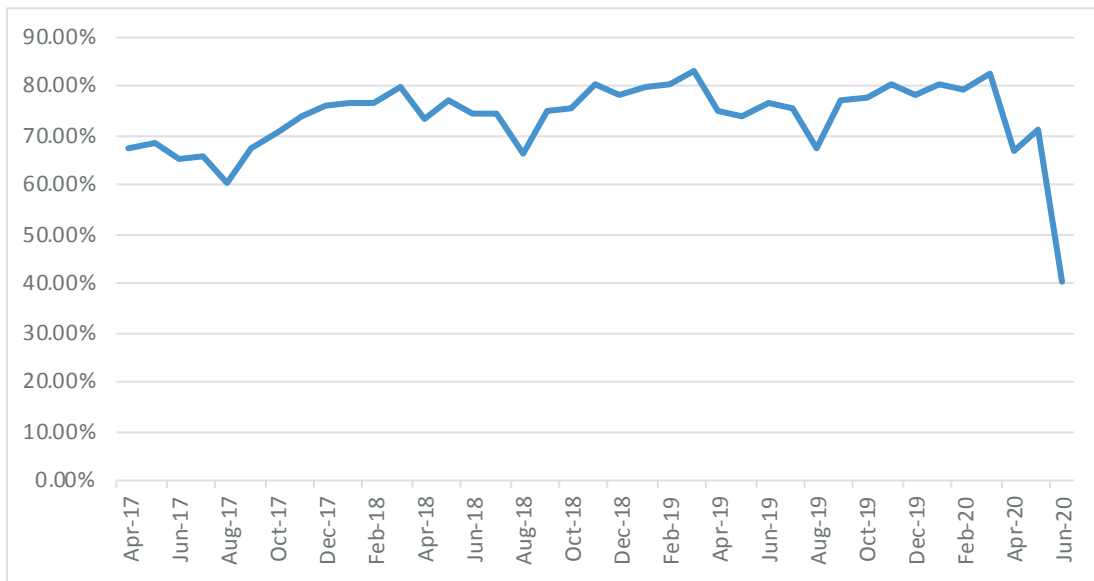
## Data and reporting

- 10.1** Management Information (MI) on the performance of the gates is provided from 2 sources, (Fujitsu and Vision-Box). Fujitsu supplies the IT solution for Warnings Index (WI) integration and Vision-Box provides the Home Office/Border Force with MI extracted from the gates.
- 10.2** Fujitsu provides both a weekly and monthly report on the gates' performance in relation to the WI. These reports detail total passengers, exit forward (where a passenger is allowed through the gates), referrals, and the referrals percentage on a port-by-port basis.
- 10.3** Vision-Box provides a monthly set of reports for each gate installation. These documents are entitled 'Operations Report' and 'Passenger Usage Report'. A special 'abridged' version of the Operations Report is produced and shared with the port operators at each installation.
- 10.4** These reports are used to prepare an ePassport gates 'dashboard' for internal use. The Home Office told inspectors that this dashboard relating to the performance of the ePassport gates is compiled by Home Office Digital, Data and Technology (DDaT). The report contains operational data for the entire gate estate, reporting by calendar month.
- 10.5** Inspectors were told by DDaT staff that although the reports provided by Vision-Box are useful, the data contained in them can be 5 weeks old. DDaT staff went on to state that although it would be possible to have real time reporting included in the benefits of the new upgrade to the gate system, and that this would be extremely useful, this has not been prioritised and will not be delivered from the outset of the forthcoming upgrade to the gates. They put this down to the focus of the upgrade being "very much on the components and the roll out" meaning that "MI has been neglected so far". They were hopeful that real time reporting would be introduced at a later date.

## Utilisation rate

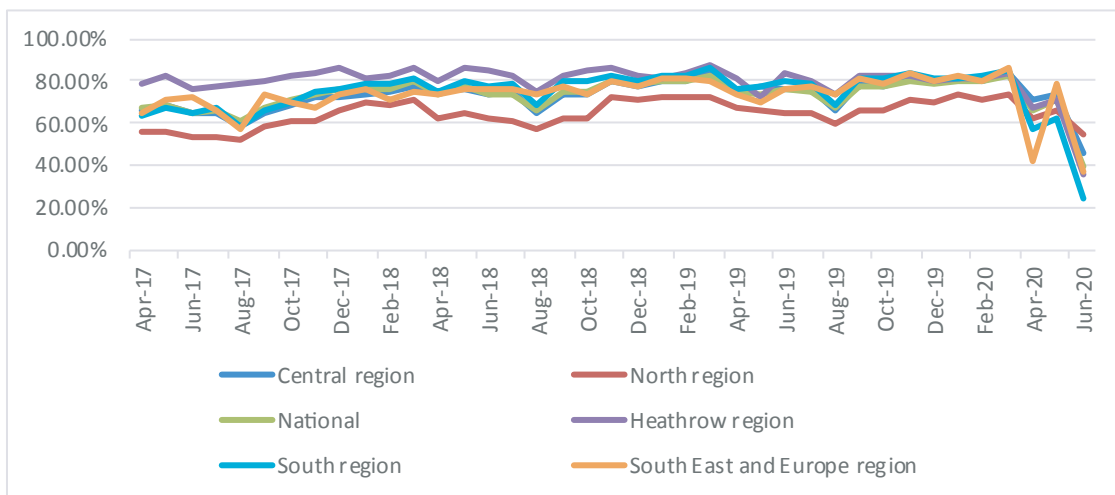
- 10.6** The gate utilisation is the percentage of eligible passengers who use the gates, rather than enter the UK via the PCP. The Home Office target for gate utilisation is 80% for all gate installations. Within the DDaT MI report referenced above, gate utilisation is detailed nationally and on a port-by-port basis. Inspectors requested these reports covering the period April 2017 to June 2020.

**Figure 12: ePassport gate utilisation national average April 2017 to June 2020**



- 10.7** Nationally, from April 2017 to April 2018, there was a general upward trend in the utilisation rate which then levelled off in the proceeding years. There was a marked drop off from February 2020 due to the COVID-19 pandemic and resultant drop in air passenger numbers. While the national average sits between 70-80%, there is quite large variation between ports. Over the period analysed, the Home Office has consistently failed to meet its target of 80% and ports in the BF North region generally operated significantly below the target.

**Figure 13: ePassport gate utilisation by region April 2017 to June 2020**



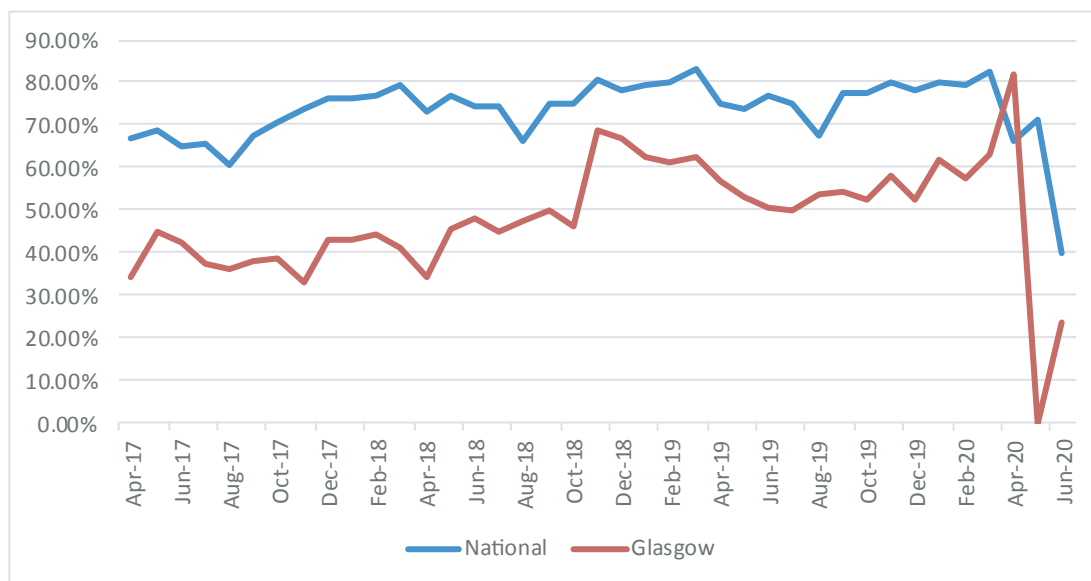
- 10.8** Inspectors were shown an ePassport Gates Programme Closure report which explained that poor gate utilisation could be attributed to numerous factors, including “passengers arriving with ID cards or children under 12 who cannot use the gates; small halls where some passengers have to use desks to prevent queue breaches or hall jams; inaccurate forecasting due to limited port operator flight information and port operators moving flights of eligible passengers to other terminals without ePassport Gates which can occur regularly.”
- 10.9** Interviews with senior Border Force staff echoed these points. A senior manager in DPS told inspectors that the target of 80% utilisation was not mandated and that it was “always good to have a target to aim for”. They told inspectors that “families make things [to achieve the target]



difficult” and that “there will be lots of different reasons at different ports” as to why gate utilisation performance does not achieve the Home Office target. They went on to state that as the gates had remained operational beyond their expected 5-year life cycle, the utilisation rate could drop below the target and the gates would still provide value for money.

- 10.10** Of the 5 ports that inspectors focused on for this inspection, Glasgow Airport had a significantly lower than average gate utilisation and performed well below the national average for gate utilisation.

**Figure 14:** Glasgow – ePassport gate utilisation, April 2017 to June 2020



- 10.11** Senior and Higher Officers told inspectors that the shortfall could be explained by the fact that passengers at Glasgow disproportionately comprised families travelling with small children and so the adult family members were unable to use the gates. Another mentioned the fact that, while passengers are eligible to use the gates, many choose not to. In particular, officers told inspectors that older passengers were less inclined to use the gates as they were less confident with the technology and spoke of “people coming up to you asking to use the desk”. Officers assured inspectors that they encouraged eligible passengers to use the gates where they could, stating that “we try to get people to use the gates, but we can’t force them”.
- 10.12** The Regional Director for Glasgow Airport told inspectors that a lot of the shortfall in gate utilisation could be explained by the infrastructure and flight patterns at Glasgow. They said that “on a normal day you will get bunches of flights coming in and once these passengers have gone through the control there can be a long gap until the next flights. You have spikes of passengers and you keep the gates going as best you can. This tends to mean that more passengers than you might want end up seeing an Officer rather than using the gates”.

## Fault/incident reporting

- 10.13** Home Office guidance states that ePassport gate incident logs should be kept on the monitoring officer’s desk during the hours of gate operation, and in the watch house<sup>71</sup> when gates are out of operation. All relevant incidents (as detailed below) must be recorded in the incident log as soon as reasonably practicable. Any incident that is worthy of recording in the incident log should also be brought to the attention of the Duty Higher Officer.

<sup>71</sup> The watch house is the command post for staff working on the immigration control, usually overseen by a Higher Officer.



- 10.14** Relevant incidents are, and reporting should include details of:
- a. any gate malfunction (detailing start and end times)
  - b. system error messages
  - c. unusual or unexpected rejections of passengers
  - d. passenger related incidents, such as tailgaters and adults carrying children
  - e. complaints about the gates
  - f. a detailed description of the incident, including which managers were present
  - g. the action that was taken at the time and any further required
  - h. if the incident requires escalation
- 10.15** Inspectors requested gate incident logs from 5 ports (Manchester Airport, Heathrow Terminal 2, Luton Airport, Glasgow Airport, and Stansted Airport) for the financial years 2017-18, 2018-19, 2019-20, and Q1 2020. The Home Office was unable to provide a complete record of incidents at these ports for the time period requested. This is because the recording of faults and incidents is undertaken differently across the 5 ports. This inconsistent approach to incident reporting meant that, while at some ports inspectors were able to review a complete set of reports, at others the data was incomplete.
- 10.16** The inconsistencies meant that it was difficult to identify trends in incidents within and across ports. In some cases, the records were of poor quality and were handwritten, with little information recorded in relation to outcomes. Where record keeping was clearer and in digital form, it was still difficult to pick out patterns as incidents were recorded in free text, making filtering to identify trends impossible. The gaps in recording made this task even more difficult. Even in the logs from Stansted Airport, which were the most detailed and well-kept, details of resolutions and outcomes were limited. Due to the inconsistent nature and poor quality of the records provided, it is unclear to inspectors how useful these records are to the Home Office, or how it uses them.
- 10.17** Awareness of the processes mandated by Home Office guidance on the recording of incidents at gates was generally good amongst staff. Most were able to tell inspectors that the log was kept either on the MO's desk or in the watch house, and that it was to be used whenever an incident occurred. One officer, however, told inspectors that although they were aware of the logs they were "not sure where they are kept".
- 10.18** Officers told inspectors that the most common reason for an incident at the gates was a mechanical or technical failure. Officers pointed to the age and condition of the gates, and in some cases the positioning of them, as factors contributing to regular breakdowns and faults. One officer told inspectors that the most common reason for gates breaking down at their port was "software bugs" caused by the "age of the equipment". Another told inspectors that the gates were "well past their lifespan" and that this caused incidents to occur more regularly.
- 10.19** Other officers told inspectors of issues that they had with the gates that were particular to the layout at their ports. Officers at Glasgow Airport told inspectors that they "have an underlying issue with the gates, the installation guidance for the gates states that they should be installed on solid floor and Glasgow has carpets" which creates a build-up of dust that "leads to the engineers coming out on a fairly regular basis". A Senior Officer at Glasgow told inspectors that the gates "constantly break down" and that "the dust affects the gates". An officer at Luton also raised the issue of dust causing the gates to malfunction describing "dust getting into the

fans”, into the gates and “overheating” them. Other issues that officers highlighted included doors jamming or the gates not opening properly, passenger error, and system and software connectivity problems.

- 10.20** Most officers told inspectors that gate incidents were a regular occurrence. One officer told inspectors that the gates were down for “about 30% of the time”. Another told inspectors that you could expect to see a fault on the gates “every day”. Inspectors also heard that gates were “always going wrong”. However, data provided to inspectors contained in the central Management Information report provided by DDaT relating to the performance of the ePassport gates showed that gate service availability regularly exceeded 99%.
- 10.21** As to how quickly incidents and faults at the gates were resolved, inspectors heard positive feedback. The majority of officers who spoke to inspectors told them that gate faults were resolved in good time. Inspectors were told that engineers arrived “pretty quickly” and that faults were usually fixed “within a couple of hours”.
- 10.22** Inspectors were told about the new system for reporting faults at the gates which was introduced in April 2020. The new system meant that officers now had to call ITnow<sup>72</sup> who then arranged for the faults to be resolved. Feedback from officers on this change was generally negative, as officers spoke of being on hold for long periods to log faults and thought that this was a poor use of their time. Officers told inspectors that they could be “on hold for 10 minutes or more before getting through” and that “if a whole bank of gates goes down, then being on hold for 15 minutes can be a real issue”.
- 10.23** Senior Home Office staff saw the new process as “a good change” but were “experiencing pushback” from BFOs. Inspectors were told that “ITnow have said that BFOs tend to bulk report (they wait until several issues arise then report them all at once), and this is why the process is taking longer on the phone”.

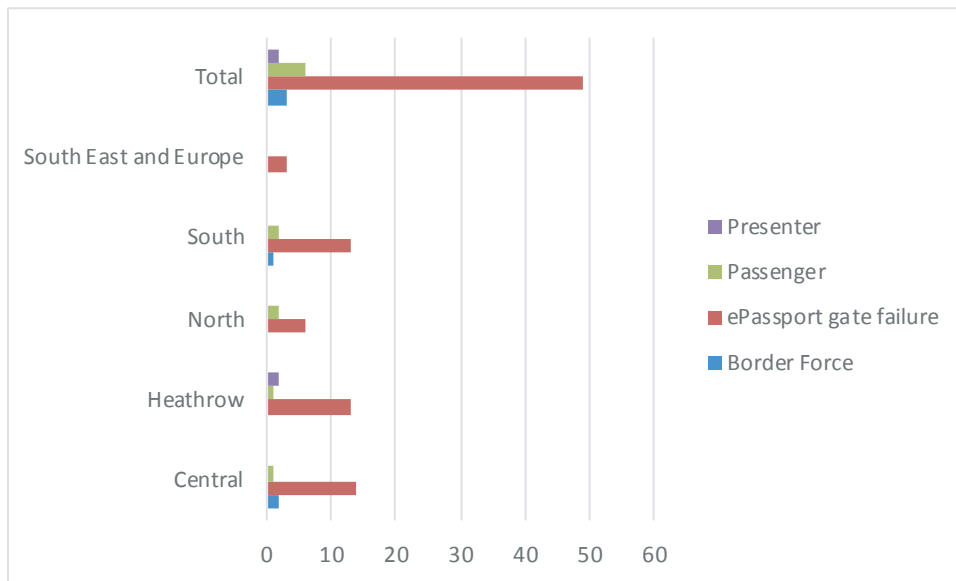
## Control breach reporting

- 10.24** The Home Office provided better records of control breach incidents. The data provided by the Home Office identified 60 breaches since 2018. The Home Office failed to provide data for 2017, saying that as it was segregated on their systems it was not immediately available.
- 10.25** The data provided by the Home Office detailed the reasons for the breach, how many passengers were involved, and whether those passengers were recovered or not. The data shows that Heathrow had the highest number of breaches in the time period. Inspectors considered that this was to be expected due to Heathrow having higher volumes of passengers using the gates. The majority of control breaches were caused by gate failure, although some were attributed to actions by passengers, Border Force Officers, and airport hosts.

---

72 The Home Office IT portal

**Figure 15: Control breaches by region and reasons for breach, 2018-19 and 2019-20**



**10.26** The data provided by the Home Office indicates that control breaches are very rare. The majority of officers told inspectors that they had not witnessed a control breach at the gates at their port. Where officers had experienced a control breach, they told inspectors that they were a very rare occurrence and that where they had occurred the passengers had been brought back to the referrals desk. One officer told inspectors that “You can sometimes see women with babies almost getting through” but that the overhead camera in the gates helps to mitigate this risk. Another told inspectors that “On a very rare occasion you might see somebody [inadvertently] get through on a family member’s passport” when they were travelling together and that if this was spotted the passenger would be stopped and taken to the referrals officer. Staff would let their Higher Officer know and they would raise it with the SLT (senior leadership team).

## Complaints

**10.27** One of the ICIBI’s ‘Expectations’ concerns errors and how these are identified, acknowledged and promptly “put right”. This means that complaints should be handled efficiently, effectively and consistently.

**10.28** Inspectors asked to see records of complaints received about the gates from passengers who use them. The Home Office was not able to provide these records. It said that all complaints are recorded on CMS (the Complaints Management System) which is owned and managed by UK Visas and Immigration (UKVI). Border Force is one of a number of users of this system, and any data extraction from it is undertaken by a dedicated CMS team. There is no user functionality for obtaining summary data. Inspectors were told that the Home Office “cannot extract data from UKVI’s complaints management system (CMS) in the format/criteria asked for”. The ICIBI’s inspection report on the handling of complaints and MP’s correspondence, published in July 2020,<sup>73</sup> highlighted this as an issue and said that the CMS should be used “to ensure there is a full, accurate and retrievable record of each complaint, how it has been handled, and the response.”

<sup>73</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/898660/An\\_inspection\\_of\\_the\\_Handling\\_of\\_Complaints\\_and\\_MP\\_s\\_Correspondence\\_by\\_the\\_Home\\_Office\\_Borders\\_Immigration\\_and\\_Citizenship\\_System.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/898660/An_inspection_of_the_Handling_of_Complaints_and_MP_s_Correspondence_by_the_Home_Office_Borders_Immigration_and_Citizenship_System.pdf)

# Service level agreements and queue times

## Service level agreements

**10.29** Inspectors asked for details of service level agreements (SLAs) between Border Force and port operators relating to the operation of the gates. Inspectors were told by the Home Office that “UKBF has not agreed specific SLAs for the eGates as these are tied in with existing SLAs for the EU/EEA queues”. The SLA currently in place for the EU/EEA queues is, “95% of European Economic Area (EEA) passengers, from the point they join an immigration queue, to be seen by an officer or arrive at an automatic passport gate within 25 minutes”.<sup>74</sup>

**10.30** In an ‘Inspection of Border Force operations at Glasgow and Edinburgh airports’<sup>75</sup>, the Independent Chief Inspector recommended that Border Force should “Provide an update on the evaluation of approaches to queue management, including progress towards standardisation, consultation with stakeholders and publication of a Service Level Agreement”. When asked for an update on progress on this recommendation, the Home Office told inspectors:

“During July - August 2019 Border Force worked on evaluating approaches to queue measurement by undertaking a series of workshops with industry, starting with the aviation industry. BF worked with DFT on the workshops which stemmed from their Aviation 2050 strategy paper. The aim of the workshops was to explore the impact of an increase in the sharing of data between government and industry that could help improve Border Force’s performance in meeting current SLAs. Border Force was also exploring further, internally and with industry, how to achieve a more consistent and standardised method of measuring queues with the aim of agreeing a new framework by end of the year. Unfortunately, competing priorities (...) means that this work was not progressed as expected. However, Border Force will conduct a full second line assurance review by OAD of its queue practices and procedures by the end of March 2021 which will inform re-prioritisation of this work in 2021.”

## Queue times

**10.31** Inspectors asked the Home Office to provide average queue waiting times for passengers using the gates across all ports for the financial years 2017-18, 2018-19, 2019-20 and Q1 2020. The Home Office was unable to provide complete data to fulfil the request. Inspectors were not provided with average queue waiting times for a number of ports, and for a number of ports where data was provided the data was incomplete (average times were not given for large parts of the period asked for). In particular, and of most use to this inspection, inspectors were not given queue waiting times for Heathrow. The Home Office explained, “PRAU (Performance Reporting & Analysis Unit) does not receive ePassport Gates queueing data from the airport operator for Heathrow, hence there is no data for [this airport] included”. Despite requests from inspectors, the Home Office failed to provide an explanation for the missing data at other ports.

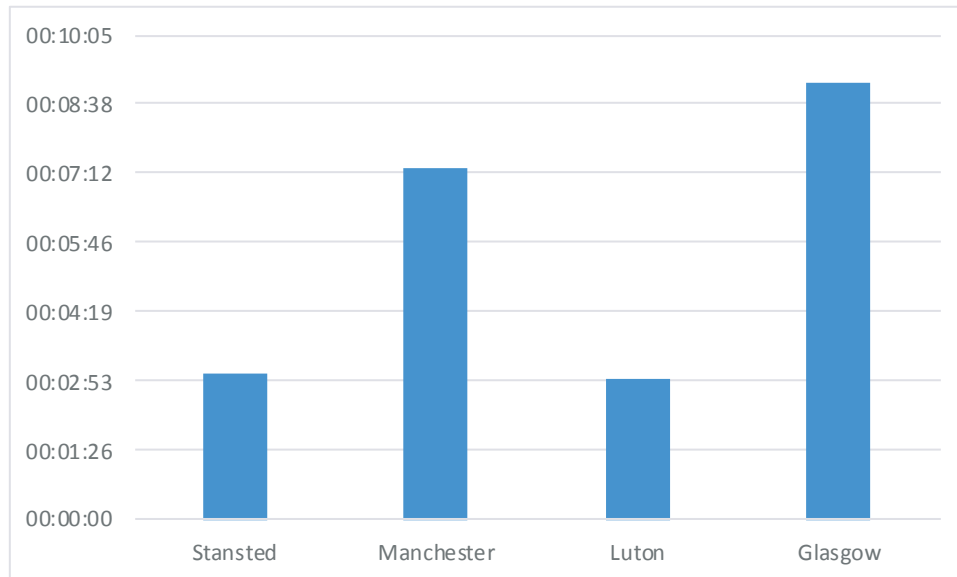
---

<sup>74</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/965692/Border\\_Force\\_Q4\\_2020\\_Published ods](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/965692/Border_Force_Q4_2020_Published ods)

<sup>75</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/843544/An\\_inspection\\_of\\_Border\\_Force\\_operations\\_Web\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843544/An_inspection_of_Border_Force_operations_Web_Accessible.pdf)

- 10.32** The data the Home Office could provide showed an average queue time at the gates across all ports of 6 minutes and one second. Excluding Heathrow, the average queue waiting times for the other 4 ports inspected are shown in the table below.

**Figure 16:** Average queue wait time, financial years 2017-18, 2018-19, 2019-20 and Q1 2020



- 10.33** While the data indicates that there are large differences between the queueing times for passengers at different ports, the data provided to inspectors had large gaps. In particular, the queuing time data supplied for Manchester and Glasgow airports was limited. Inspectors only received the recorded average times for Glasgow Airport (December 2017, January 2018 and February 2019) and only around half of the expected recorded average times for Manchester. Where the data was complete, the average queue time over the period requested was much lower, indicating that the average queue waiting time data provided for Glasgow and Manchester could be unrepresentative.
- 10.34** Inspectors spoke to BFOs, Senior and Higher Officers and more senior Border Force staff and asked how the introduction of the gates had affected performance at their ports. Many of those spoken to pointed towards a reduction in processing time for passengers as a direct result of gate use. One officer told inspectors that “we couldn’t do without them [the gates] now, they process people very quickly in busy times”. A Senior Officer said that “Without them [the gates] it would be a nightmare, especially in busy periods”. Another told inspectors “from my point of view they’re our saviour and we wouldn’t be able to cope with the volume of passengers without them”.
- 10.35** Senior Border Force staff had similar views on the effect that the introduction of gates had on queue and processing times. One Regional Director described the impact as “significant” and added that “we have had a huge growth in passenger numbers...ePassport gates allow us to process all of those extra passengers”. Another told inspectors that “there is a general acceptance that airports in [this] region would not have been able to deal with steadily increasing airport traffic without help from some sort of technology” and that “gates are a way to eat in to the number of passengers”.

## Facial Recognition Algorithm

- 10.36** The Facial Recognition Algorithm (FRA) is the tool by which ePassport gates assess the likelihood of a passenger using the gates being the rightful holder of the travel document that has been presented.
- 10.37** Facial recognition technology is capable of matching a human face from a digital image or a video frame against a database of faces. At the gates, the facial recognition algorithm matches the live image of the passenger at the gate with the image stored on the chip of the passenger's passport. It does this by pinpointing and measuring facial features from the live image and comparing them to those on the stored image. There is a matching threshold above which the passenger is deemed to be the rightful holder of the travel document and is therefore allowed through the gates. Since 2013, the matching threshold for the facial algorithm employed by the gates has been set at an agreed threshold and subject to review.

### How the threshold is set

- 10.38** A senior manager in DPS told inspectors that the facial recognition algorithm threshold is "determined at a point whereby you manage the number of rejections at the referral point but within the confidence level that you can be satisfied [that the border is secure]". Inspectors understood this to mean that a balance is struck between the number of false rejections (where a passenger is rejected by the gates even though they are the rightful holder of the travel document) and the number of false positives (where the passenger is allowed through the gates when they are not the rightful holder of the travel document). It was suggested to inspectors that the optimum algorithm threshold would be at a point where the false acceptance rate (FAR) is almost negligible, and the false rejection rate (FRR) is as low as possible.
- 10.39** The Home Office did not provide any documents which indicated the levels of FRR and FAR at the current agreed algorithm threshold. However, inspectors saw a document which indicated that the planned upgrade of the facial recognition algorithm (a Vision-Box product) will provide a FRR below 0.1% and a FAR of around 0.01% (1 in 100,000 imposter attempts) when set at the current agreed threshold. This is a better rate than the current algorithm.
- 10.40** The referral rate at the gates is detailed in the DDaT MI report referenced earlier in this chapter. This is the rate at which passengers are rejected from the gates and sent to the referrals desk for further investigation before being allowed to enter the UK. The data in the report gives information on the national, regional and port average on a month to month basis.
- 10.41** The referral rate is a good indication of whether passengers are being properly screened by the gates. If the referral rate is very high, then it is possible that the gates are obstructing the movement of passengers through the border unnecessarily. If the referral rate is very low, then it is possible that the gates are not rejecting passengers when they should be.
- 10.42** The dashboard provided by the Home Office suggests that the target for referrals at the gates is below 8%, showing that there is a built-in tolerance for false rejections. This is consistent with the facial recognition algorithm threshold being set at a level which results in false rejections at the gates.
- 10.43** Responsibility for the initial approval and any subsequent changes to the FRA was initially unclear to inspectors. Inspectors were told variously that ministers, DPS and "a number of governance structures" held responsibility and that "when the algorithm was first set it would

have been determined by ministers” but that it has “effectively remained at the same point ever since”<sup>76</sup>. The Home Office told inspectors that “the facial recognition algorithm on the current ePassport gates solution (in place since 2013) has never been altered”.

## Racial bias

- 10.44** Academic research<sup>77</sup> has suggested that facial recognition algorithms can disproportionately reject more people of colour from ePassport gates. A senior manager in DPS said the Home Office was aware of this issue and was looking into it. They said the issue had “become more noticeable as the gates have been expanded across the registered travellers’ scheme and to B5JSSK nationals”. Before these expansions the issue was not as pressing because the older algorithms developed by industry used European data sets with less ethnic diversity. The Home Office is aware that the current algorithm has been superseded by others that have been developed with a wider ethnicity base and told inspectors that work is being done in this area to improve outcomes at gates for people of different ethnicity, not least through the introduction of the new algorithm which will be installed as part of the planned gate upgrade.

## Warnings Index (WI) matching threshold

- 10.45** The Warnings Index (WI) is connected to the gates. Through this, every passenger’s biographical details stored on their passport chip are checked against the watchlist. A match is made using an algorithm which has a set threshold at which to determine a match. As with the facial recognition algorithm threshold, inspectors understand that the WI matching threshold is set at a point whereby a balance is struck between false acceptance and false rejection.
- 10.46** The Home Office told inspectors that search matching thresholds for the WI are analogous to the search matching thresholds for facial recognition, in that any work to change the threshold would “need to be approved by ministers and administered by the supplier [Fujitsu-Siemens] via the service request process”. Further, “The WI accreditor would need to be content with proposed changes and WICU [the Watchlist Information Control Unit which oversees the WI] would, as a consultation measure, invite comments from the broad spectrum of WI data owners whose entries may be affected by any changes proposed.”
- 10.47** The Warnings Index was created in 1995. WICU told inspectors that it could “find no record of a change to this threshold in the operational/production environment since its introduction.”

## Contingency plan

- 10.48** Inspectors asked the Home Office for copies of contingency plans for a catastrophic failure of the gates, such that none of them were able to operate or an insufficient number of them were able to operate. The Home Office told inspectors that due to the setup of the gates it believed it was highly unlikely that the whole gates estate would suffer an outage:

“The ePassport Gates estate is deployed in installations of 5 eGates (1 Bank) from 1 – 6 banks of Egates per port as required. Due to this method of deployment, Home Office DDAT colleagues believe it is highly unlikely the UK-wide estate would ever suffer an entire

---

<sup>76</sup> The Home Office clarified the process for changing the threshold as follows: “The facial recognition algorithm threshold on UK ePassport Gates can be changed through a configuration tool. This tool is administered by the Home Office IT supplier (Fujitsu) and would only be altered following a change request by the Authority (Home Office/UK Border Force). Before a change request was submitted to the IT supplier, a policy decision to amend the algorithm threshold would pass through several levels of internal governance including, ultimately, a Ministerial submission.”

<sup>77</sup> [https://www.turing.ac.uk/sites/default/files/2020-10/understanding\\_bias\\_in\\_facial\\_recognition\\_technology.pdf](https://www.turing.ac.uk/sites/default/files/2020-10/understanding_bias_in_facial_recognition_technology.pdf), <http://sitn.hms.harvard.edu/flash/2020/racial-discrimination-in-face-recognition-technology/>.

outage. However, there is an agreed contractual process to escalate (and resolve) service failures of all levels of severity to Vision Box should support be required.”

- 10.49** In the event of a catastrophic failure of the gates, regional and port business continuity plans would be invoked as necessary depending on the nature and scale of the incident, and consideration would be given as to whether a local or national critical incident should be declared.



# 11. Inspection findings: External impacts

## Brexit – threats and opportunities

- 11.1** The 2025 UK Border Strategy states that the UK's exit from the European Union "provides the country with a unique opportunity to create a border that is fit for the future and benefits all the nations of the UK."<sup>78</sup>
- 11.2** In line with the ICIBI's expectations that guidance and instructions are easy to understand and use, inspectors looked at the guidance issued to Border Force staff on how to process passengers who are eligible to use the gates following the end of the transition period. Guidance on the operational processes for dealing with EU, European Economic Area (EEA) and Swiss passengers and their family members who arrive at the UK border after the end of the transition period was published on 16 December 2020 and is available on the Home Office intranet. The guidance on how to process passengers who are eligible to use the gates by virtue of their nationality, following the end of the transition period (which was formerly the guidance on how to process B5JSSK nationals), was updated to add European Economic Area (EEA) and Swiss nationals to those who are eligible to obtain permission using a gate. (Inspectors noted that this guidance was published on 31 December 2020, the day the transition period ended.)
- 11.3** This guidance states that in addition to UK and Irish nationals, EU nationals, EEA EFTA nationals, Swiss nationals and B5JSSK nationals (Australia, Canada, Japan, New Zealand, Singapore, South Korea, USA) were eligible to use the gates from 11.00pm on 31 December 2020 in the following categories:
- "visitors (including short term students)
  - entry clearance/Biometric Residence Permit (BRP) holders
  - those with indefinite permission to enter/remain
  - those with digital status (including EU Settlement Scheme)
  - those with saved EEA rights
  - individuals joining an EEA family member in the UK
  - frontier workers
  - S2 healthcare visitors"
- 11.4** To use a gate, nationals from these countries must have "a chipped passport, are aged 18 or over (or, if accompanied by an adult, between 12 and 17)."
- 11.5** The Home Office also provided inspectors with links to guidance on Ocelot, the Border Force guidance hub, but this appeared to only contain one reference to the gates in relation to varying leave for B5JSSK nationals.
- 11.6** In November 2020, a port operator told inspectors of their concerns at the uncertainty surrounding the details of the end of transition agreement. This meant that they would have

---

<sup>78</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945380/2025\\_UK\\_Border\\_Strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945380/2025_UK_Border_Strategy.pdf)

very little time to order the new signage required for their airport to ensure it was in place for 1 January 2021.

- 11.7** The National Audit Office (NAO) report on the Digital Services at the Border programme highlighted that from July 2021, “the Department’s EU Exit policy objective is to check at the border whether EU passengers have settled status in the UK (‘status check’).”
- 11.8** The Home Office guidance on how to process nationalities eligible to use the gates reminds staff that the gates “cannot distinguish between people who require specific permission to be granted by a Border Force Officer, entry-clearance holders, and those who require permission as visitors.” As a result, it states that it should not be discounted that passengers could use the gates in error and BFOs are instructed to follow the procedure when a passenger realises their mistake and presents themselves back at the PCP.
- 11.9** Inspectors asked the Home Office how it could be confident that passengers using the gates had the correct entry clearance given that it would not be able to check the status of those using the gates until July 2021. Staff from the Future Borders and Immigration System said that this was a “known risk” but this cohort was deemed to be “low risk” in terms of the threat they posed to the immigration control.
- 11.10** The NAO report also highlighted that from October 2021, the Home Office “plans to prevent people travelling to the UK on identity cards rather than a full passport except where they have, until at least 31 December 2025, a protected right to do so.” This was seen to be a benefit of the UK’s withdrawal from the EU by Home Office staff, given that some European identity cards are open to abuse. The move to enforcing travel on passports rather than identity cards will lead to an increase in passenger volumes using the gates. The Home Office told inspectors that it had modelled this increase and was confident that the gates could manage the volumes. However, there were concerns about space constraints in the capacity of airport arrival halls with the move of passengers from using the PCP to the gates.

## COVID-19 – threats and opportunities

- 11.11** The impact of the COVID-19 pandemic on the global aviation industry has been well documented. The National Audit Office reported that there were 141 million passenger arrivals to the UK in the year to March 2020, but this had fallen to 103 million in the year to June 2020 due to the COVID-19 pandemic.<sup>79</sup> The GOV.UK website reported that air passenger numbers in January 2021 had decreased by 91% compared to those in January 2020.<sup>80</sup>
- 11.12** The Home Office told inspectors that as of February 2021, a number of airports and terminals that operate e-Passport gates remained closed as a result of the pandemic, including Heathrow Terminals 3 and 4, Gatwick South, and Manchester Terminals 2 and 3.
- 11.13** The 2025 UK Border Strategy recognised the impact of the COVID-19 pandemic on passenger travel, saying that the UK government would,
  - “work with industry to develop a proof of concept for a contactless travel model for UK citizens based on biometric e-passport technology. In the longer-term this model could allow for faster movement of UK citizens across the border with a greatly reduced risk of identity fraud. Delivering a fully contactless model may also be an important health

---

<sup>79</sup> <https://www.nao.org.uk/wp-content/uploads/2020/12/Digital-Services-at-the-Border.pdf>

<sup>80</sup> <https://www.gov.uk/government/statistics/statistics-relating-to-passenger-arrivals-since-the-COVID-19-outbreak-february-2021/statistics-relating-to-passenger-arrivals-since-the-COVID-19-outbreak-february-2021>

protection measure, allowing UK ports to protect their customers and provide more resilience of the travel industry to global health threats.”

- 11.14** Vision-Box also recognised this opportunity, highlighting its work to deploy a “contactless traveller experience” at Dubai International Airport. This uses “touchless kiosks” to allow passengers to register their facial biometrics when they check in for a flight which creates an identification token that allows them to move through airport security and board their flight with only a facial recognition scan.

“Passengers that opt into the program will no longer need to hand their travel documents to a human agent, which will reduce the risk of transmission of COVID-19 and other diseases. The technology is expected to help restore trust during the pandemic...”

- 11.15** Industry publications also identified potential opportunities from the pandemic. One suggested that instead of making passengers stand in a queue to use a touch screen kiosk or ePassport gate, they could be allowed to “enrol their information in advance of arrival, on their own smartphone, and grant access based on a touchless facial match at the border.”<sup>81</sup>

- 11.16** Another noted that concerns about technical malfunctions and low accuracy rates had created a “public backlash” against gates, but Vision-Box were now branding them “as a potential containment solution against coronavirus” and stating that “the pandemic will pave the way for greater use of contactless digital identity technology equipped with advanced biometrics.”<sup>82</sup>

- 11.17** In response to the consultation on the 2025 UK Border Strategy, an industry body suggested that:

“In the context of a post pandemic world, a touchless passenger experience will take on added significance, leading to an increased need for self-service options and integrating new safe contactless processes and technologies which are crucial both on rebuilding but also retaining passenger confidence. As aviation gradually restarts following the COVID-19 pandemic, where health declarations are still required on arrival, governments should consider electronic options (mobile applications and QR codes) to minimize human-to-human contact.”

- 11.18** There is a risk that the focus on contactless movement through an airport does not address the issue of infected passengers being able to travel unless the checking of health declarations and post-arrival tracing are incorporated in the overall process. Protecting everyone within an airport will have limited benefits if the public at large are still put at risk.
- 11.19** DPS staff noted some opportunities from the decline in passenger numbers, including the ability to perform deep cleans and maintenance on the gates. Border Force staff at one location said that the “only benefit of Covid means less passengers and for the first time, staff shortages are not an issue.”
- 11.20** Vision-Box noted that the lower passenger volumes would allow it and the Home Office to carry out the Orchestra Services Platform upgrade “with minimal operational impact to the Ports.”

---

81 [https://worldreach.com/wp-content/uploads/2020/06/WP\\_Border-Management-After-the-Pandemic.pdf](https://worldreach.com/wp-content/uploads/2020/06/WP_Border-Management-After-the-Pandemic.pdf)

82 [https://airport.nridigital.com/air\\_may20/airport\\_egates](https://airport.nridigital.com/air_may20/airport_egates)

## Face masks

- 11.21** The pandemic had also caused serious logistical issues for Border Force, including the operation of the gates, with the closure of airport terminals and staff working in 'bubbles' to help minimise the impact of infection rates on staffing levels. Higher Officers in one location noted that the gates had to be cleaned after every flight and that maintaining social distancing for passengers had been difficult in the immigration hall. They had reduced the number of gates that were open to try and improve social distancing, but this did not address the issue of passengers from different flights using the same gates. They had also experienced problems with passengers who did not take off their face masks when using the gates, meaning that they were unable to get through them. This was echoed by staff at another port who said that this led to longer queues at the referrals desk.
- 11.22** Staff told inspectors they were concerned that passengers were managing to pass through the gates while wearing a face mask. In one location, staff said they were concerned about the facial recognition matching threshold and that they had "a feeling that the threshold has been lowered to accommodate the current climate [the COVID-19 pandemic]". However, as noted in Chapter 10, the Home Office told inspectors that the threshold had not been altered since its introduction in 2013.
- 11.23** DPS staff were aware of this issue but did not appear concerned by it. One said there had been "a few reported incidents" and "fortunately all the ones we've recorded have been the genuine passport holder so it's evidence of the algorithm doing its job." A senior manager supported this view, saying that it was "not an issue" as the algorithm had "matched accurately with a smaller amount of face on show." This raised the question as to whether some passengers had managed to pass through the gates while wearing a face mask and had not been detected or recorded.
- 11.24** The DPS view was that as the facial recognition algorithm currently being used by the gates is relatively old compared to others in the field, it was working in the Home Office's favour as it was "rejecting a lot of people" and therefore maintaining the integrity of the border. The rejection rate at the gates had "gone up exponentially as a result of people wearing face masks." This meant that those passengers would be sent to the referrals desk where they would undergo a check using the imposter detection equipment. DPS were keen to point out that wearing a face mask to try and circumvent the gates would not therefore help an imposter and that they had communicated this back to Border Force staff.
- 11.25** DPS staff cited 2 reports that the National Institute of Standards and Technology (NIST) had published on this issue which appeared to support their views.<sup>83</sup> These were picked up by the Biometrics Institute in a press release it issued in December 2020, entitled 'Masks must change how face biometrics are developed and applied'.<sup>84</sup> The release noted that the first NIST report, published in July 2020, looked at the result of tests on pre-pandemic algorithms that had already been submitted for evaluation. "It found that even the best of the 89 commercial facial recognition algorithms tested had error rates of between 5% and 50% in matching digitally-applied face masks with photos of the same person without a mask." The second report built on the first by testing a further 65 facial recognition algorithms that had been provided to NIST after the middle of March 2020.

---

<sup>83</sup> <https://www.nist.gov/about-nist>

<sup>84</sup> <https://www.biometricsinstitute.org/press-release-masks-must-change-how-face-biometrics-are-developed-and-applied/>

- 11.26** Acknowledging the NIST reports, the Biometrics Institute noted that “face biometrics where masks are used must be carefully risk managed to maintain safety, public confidence and security.” They identified the common theme in all of the NIST tests on facial recognition as:

“each algorithm performs differently. Now more than ever, it’s vital that anyone using biometrics makes a point of understanding the limitations of their individual algorithm and thoroughly tests its performance both in their own environment and through an independent laboratory. And as new systems are developed, they must be independently tested before being presented to the public.”

DPS acknowledged the need to monitor use of the gates by passengers wearing face masks when the gates are upgraded with the new facial recognition, as “new algorithms are so accurate that it can reach a threshold based on the eye area and let people through accordingly .”

## Health measures at the border

- 11.27** The restrictions on gate use and requirements on Border Force to enforce health measures at the border were raised by stakeholders in response to the call for evidence, with one noting that “the ePassport Gates used to work brilliantly pre-COVID. Due to the necessary manual checks of the Passenger Locator Forms (PLFs) by UKBF, they have become much less intensely used. It would be fantastic if PLF compliance checks could be automated/integrated.”
- 11.28** This was backed up by Border Force staff. At one port, Border Force Officers said that as the PLFs had to be completed at the control, fewer passengers were using the gates and were being redirected to the PCP. “We just don’t have the flights now. Passenger numbers are very low, so we frequently don’t even switch the gates on.”
- 11.29** This approach was not supported by staff in Border Force National Operations Headquarters who told inspectors that ports “should prioritise the use of gates rather than turning them off.” They said that there were benefits to keeping the gates open and that they “should not be the first thing that gets turned off when there are staffing pressures.”
- 11.30** At another port, staff said that the need for passengers to complete the PLF meant that roving officers got “caught up” helping passengers with them “rather than fulfilling their normal role.” When this is combined with the withdrawal or reduction of hosts at many ports, resulting in roving officers being drawn into performing that role, the ability of staff to perform the roving officer role effectively has to be questioned.
- 11.31** Inspectors were told that the pandemic (and preparations for the UK’s departure from the EU) had created additional pressures for frontline and Operational Policy staff which had led to delays to the implementation or commencement of reviews into aspects of the gate operation. This was confirmed by policy staff when inspectors spoke to them, but inspectors considered this to be a short-sighted approach given that the gates are seen as a key part of the solution to these issues.
- 11.32** Border Force has a difficult balancing act to perform in operationalising and enforcing HM Government’s health measures policy at the border – the guidance for which is often provided at short notice - while maintaining the immigration and customs control. The Immigration Services Union reported that verbal abuse of Border Force staff at ports had increased

significantly since the health measures at the border were implemented, as they are often the first person in a uniform that passengers see on arrival in the UK.<sup>85</sup>

## Guidance on operating the gates during the pandemic

**11.33** In line with the ICIBI's expectation that guidance should be easy to understand and use, inspectors looked at the guidance available to Border Force staff on operating the gates during the pandemic. The Home Office intranet has a page entitled 'COVID-19 Border Health Measures' that contains links to 15 separate documents. Of these, only 3 refer to the gates. Inspectors noted that it often takes several days for new guidance to appear on the intranet, a potential cause for concern given the fast-moving nature of the response to the virus. The Home Office said that guidance was issued to Border Force staff by email via Interim Operational Instructions (IOIs), which was a quicker and more efficient process than waiting for it to be published on the intranet. It was not clear how managers verified that the relevant staff had seen and read any new guidance that was issued.

---

<sup>85</sup> <https://committees.parliament.uk/oralevidence/1487/pdf/>

## 12. Inspection findings: Planning for the future border

### ePassport gate upgrade programme

- 12.1** Digital Passenger Services (DPS) is overseeing a programme to upgrade the operating platform for the operation of gates. Vision-Box have developed a standardised gate management platform called the Orchestra Services Platform (OSP) which runs on Windows 10 (replacing the current Windows 7 platform which is no longer supported by Microsoft).<sup>86</sup> In addition, the gates estate needs to connect to Border Crossing, a new ‘back end system’ that will replace the Warnings Index to provide a new watchlist, and enable the Future Border and Immigration System (FBIS) to deliver key policy changes.
- 12.2** Inspectors wanted to understand whether the upgrade would provide the capabilities required by Border Force or whether it was being driven by the supplier’s desire to provide a new product rather than maintain the existing one. DPS staff said it was a mixture of both. The fact that Windows 7 would no longer be supported provided an opportunity for change and the move to Windows 10, and changes to policy requirements meant that some upgrades and enhancements to the gates were required.
- 12.3** The Home Office listed the benefits of the upgrade as:
- “• Upgrade ePassport Gates to a Windows 10 management platform.
  - Connect upgraded gates to Border Crossing
  - Upgrade the Facial recognition algorithm
  - Deliver a range of other benefits such as:-
    - Moving off unsupported Windows 7 software reducing risk of failure of components
    - Enabling HO to end WI contracts with Fujitsu by 2022
    - In house configurable eGate rules management system
    - Reduce the cost of new service contracts on gates
    - Reduction of referral rates through new facial recognition algorithm
    - Future opportunity to configure the Monitoring Officer interface
    - Flexibility for future eGate solutions such as change of biometric or seamless flow”
- 12.4** As noted previously, staff in Home Office Digital, Data and Technology (DDaT) highlighted the new features that the OSP could provide, including the ability to provide real time reporting on the system which would be extremely useful to both DDaT and Border Force staff at ports. However, they said that DPS had decided not to include this in the upgrade and that management information had been “neglected”. They were hopeful that this would change with time. In response, a DPS senior manager said that real time reporting was not included in the scope of the upgrade, which had been agreed over 2 years previously.” This appeared to

---

<sup>86</sup> See: <https://www.microsoft.com/en-gb/windows/windows-7-end-of-life-support-information>



reflect a disconnect between the 2 business areas responsible for the roll out and management of the upgraded system.

- 12.5** In July 2020, the Home Office told inspectors that it planned to roll out the new platform to the first adopter site (Gatwick South) in the first quarter of 2021 and complete roll out of the upgrade to all gate locations in quarter 4 of 2021. In March 2021, the Home Office told inspectors that roll out had not yet started, with work concentrating on the early adopter sites. "Roll out is due to begin in mid-April and end at the end of this year. It is worth noting that this is a complex project which is subject to change to accommodate ministerial direction on health measures at the border so may still be revised over the next few weeks."
- 12.6** The delivery programme was being managed jointly between DPS and DSAB. In DPS, a team of Grade 7 project managers, led by a Grade 6, was managing liaison with Border Force commands and port authorities for the delivery of hardware and permission for suppliers and contractors to work on-site. DSAB were managing the technical delivery, including integration with the new back end system, Border Crossing.
- 12.7** Vision-Box had raised concerns with inspectors regarding the complex governance structure created by the Home Office to deliver the upgrade programme. A DPS manager said they had recognised this and told inspectors in December 2020 that they were taking steps to simplify the structure. In addition to this, Vision-Box told inspectors that "from a supplier delivery perspective, the structure is missing the 'System Integration' key function to assure the performance and the effectiveness of the solution." There also seemed to be some confusion within the Home Office over which business area would perform this role. DPS believed that DDaT should do it, noting that it aligned to the new model the Home Office was seeking to implement in which one supplier was not in a dominant system integration role and that work was brought 'in-house'. DDaT were unsure what Vision-Box were referring to and did not agree with their view, referring again to the limited resources Vision-Box allocated to this work. Meanwhile, Home Office commercial staff said they thought that DPS were performing the role as the structure to deliver the upgrade was the same structure used to deploy the original gates and Vision-Box "should be familiar with it."
- 12.8** In July 2020, a Home Office briefing to inspectors on the integration of the new operating platform and Border Crossing highlighted a significant disbenefit in the potential downtime of the gates at ports. It noted "A period of on-site work and testing that would mean the ePassport Gates being unavailable for processing passengers for a period of approximately 1 month (tbc) in advance of go-live at each site in scope of upgrade." This period was understood to be potentially longer (up to 7 weeks) for the early adopter sites. However, the reduction in passenger volumes caused by the COVID-19 pandemic meant that the disruption to port operations was likely to be lessened.
- 12.9** The roll out of the wider upgrade programme had been delayed by problems with the roll out of the interrelated Border Crossing system, the new back end system that will host the replacement for the Warnings Index. The roll out of Border Crossing began in September 2019 (it was originally planned for 2017), but the system experienced unplanned outages soon after roll out began. In September 2020, the Home Office told inspectors that the "outages were far greater in number and frequency than had been anticipated" and it became apparent that "there were fundamental issues with the scalability and robustness of Border Crossing." The decision was taken to halt the Border Crossing upgrade to resolve the issues with the intention of resuming it in November 2020, with the upgrade to the gates following in early 2021.



- 12.10** The National Audit Office (NAO) published a report on the Digital Services at the Border (DSaB) programme in December 2020, which highlighted issues with the roll out of Border Crossing. The report noted that the intention was to reintroduce Border Crossing in November 2020, “with 24/7 service availability from April 2021 and national roll out by mid-June 2021 to all 56 ports covered by the programme.” It stated that “this far exceeds the scale and pace of roll out it achieved with its previous version of Border Crossing” and highlighted that the Home Office had “made contingency arrangements for once Warnings Index is decommissioned in case Border Crossing cannot meet its planned 99.93% availability. If Border Crossing were not available there would be a risk of disruption at the border.”
- 12.11** The Public Accounts Committee published a report on the DSaB programme in March 2021.<sup>87</sup> The Committee noted that, at that time, “the ‘Border Crossing’ part of the programme is being used by only 300 border staff, against the 7,000 supposed to be using the system by June 2021, and previous attempts to roll out Border Crossing experienced technical difficulties.” DPS staff told inspectors they had confidence in the DSaB team responsible for the roll out of Border Crossing.

## Engagement with port operators and staff

- 12.12** In December 2020, DPS staff told inspectors that they had started engaging with port operators and stakeholders about the upgrade and had provided them with a high-level overview of it. The roll out plan was still being finalised and port operators and stakeholders were being told that roll out would take place “some time in 2021.” A senior manager highlighted the establishment of monthly port operators’ meetings which they said operated like a forum. They said the port operators were pleased with them as they provided DPS with an understanding of their viewpoints. Another said that port operators were “fully engaged with the planning of the roll out.” However, of the 4 port operator representatives that inspectors spoke to in November and December 2020, only one said that they were aware of the upgrade.
- 12.13** In terms of communications to Border Force staff about the upgrade, DPS said that the BF structure meant that they communicated with staff at a senior level and expected them to cascade the information to staff in their commands. Super users were expected to provide updates on the upgrade as well as training to staff on how to use the upgraded gates.
- 12.14** DPS said they had to time communications to staff about business change carefully and a communication plan was in place. Informing staff too far in advance of the upgrade would risk them forgetting about it, especially as, at that time, there was a large amount of other business change going on in advance of the UK’s departure from the EU. This aligned with inspectors’ experiences of interviewing staff in November and December 2020, when it was clear that Border Force Officers were unaware of the upgrade project. Awareness increased with seniority but was not consistent across all ports.

## Planning horizon for the future border

- 12.15** In December 2020, the UK government published the 2025 UK Border Strategy following an online public consultation exercise. The strategic objective was a border that “facilitates the movement of people that benefits the UK, while preventing abuse of the migration system, and safeguarding vulnerable people.”

---

87 Digital Services at the Border - Public Accounts Committee - House of Commons (parliament.uk).

- 12.16** The Strategy states that the target operating model for the future border “sets out a high-level vision” which describes how passengers will have to obtain ‘permission to travel’ before departure. This “will increasingly become a digital status that will be confirmed before departure to ease the flow for legitimate passengers at the border whilst keeping threats away.” At the border, passengers will experience “automated passage via eGates and biometrics for both UK and non-UK citizens.”
- 12.17** The strategy also highlights how gates have proved effective at increasing capacity at ports, citing that “in 2018, there were 51.9 million ePassport gate transactions, an increase of 376% over the previous five years, due to the expansion of our eGates offering.”
- 12.18** BICS PI (Borders, Immigration, Citizenship System, Policy and International) staff described the difference between the current process at the gates and the future vision. Use of the gates is currently dictated by a passenger’s nationality and they are “a facilitation tool for lower risk cohorts”. They acknowledged that gates were better than humans at confirming identity, identifying imposters and checking watchlists, a view endorsed by Border Force managers. The future vision, which is being implemented by the Digitising the Border programme, will ensure that everyone travelling to the UK will have permission to travel, whether that is through a visa or an electronic travel authority (ETA). The potential for human error will be removed by ensuring all passengers go through a pre-clearance process. This will mean that a “much smaller group” of passengers will be streamed by the gates to be examined by a Border Force Officer.
- 12.19** This view was shared by senior managers in DPS, with one stating that “gates will be the default option for 90% of the travelling public.” The ultimate goal was for everyone to have a digital status so that “by the time that travellers get to the control point they should have gone through so many digital forms of checking that the control is the very last step to provide assurance - whether it is still gates by this point is up in the air.”
- 12.20** Policy staff acknowledged that the future border could not be designed in isolation and that they had started discussions with airlines and airport operators to design the new passenger journey. This was reflected in the submissions received in the response to the call for evidence.
- 12.21** One port operator, who said they had previously lobbied Border Force around changes to the use of the gates, looked forward to having “a significant influence” in these discussions going forwards. They were keen to see a more digitised border and stated that while they acknowledged that Border Force had ambition, they (Border Force) were limited by the boundaries of current legislation.
- 12.22** Another port operator expressed concerns about the ability of the Home Office and Border Force “to meet the requirements (of any new solution) within a reasonable timeframe when their approach appears to be inward focused.” Their view was that industry should “be allowed to drive this forward in order to achieve the necessary standards” citing “the example set by aviation security whereby developments are driven by port operators working alongside technology manufacturers, allowing the Department for Transport to maintain a role closer to that of a governing body.”
- 12.23** This is reflected in the 2025 UK Border Strategy which states that it will:
- “Set out the standards and requirements for border infrastructure and facilities, in partnership with ports and the border industry, to support investment in innovation,

modern and user-centered designs to speed up and secure the passage of people and goods through ports”

- 12.24** Inspectors were told that the current planning horizon for the future border is 2025. A senior manager in DPS acknowledged that this might not be far enough ahead for port operators, who were often frustrated when they sought a view of the future from Border Force. The limitation to planning further ahead was explained by the fact that the future border was shaped by government ministers, and that ministerial changes could result in a changing view of what the future border should look like. However, it was also noted that Border Force “very strongly feed into future strategy alongside ministers and policy colleagues. There is a very clear view of what the border should look like.”
- 12.25** Concerns about whether the planning horizon was set far enough ahead were shared by senior Border Force staff, with one Regional Director telling inspectors that there was a need for a clearer biometric strategy for the country. While they were aware of the strategy in place up to 2025, they were not sure “that BF and the government are looking far enough ahead in this space” and there was an opportunity for greater synchronicity with police systems and for checking fingerprint records at the gates.
- 12.26** DPS had started work to consider the design and capability of the next generation of gates. A senior manager said that given the capability that people now had to use false chips and manipulate photographs, there was agreement that the next generation should include more than one biometric capability. The ability to check a passenger’s fingerprint was the most likely additional capability, but it was recognised that this would be costly to implement.
- 12.27** DPS were also keen to look at how family groups could be processed in future, given frustrations that children under the age of 12 are unable to use the gates. However, the faces of children under the age of 12 change quickly and a technological solution to address this had not yet been found. There were also safeguarding issues to be considered with the need to ascertain who children were travelling with.
- 12.28** Vision-Box told inspectors they had been made aware of a number of procurement plans that related to the gates. In May 2020, they had taken part in a market engagement event, hosted by TechUK,<sup>88</sup> at which the Home Office outlined its interim procurement plans for gates. A senior manager in DPS confirmed that a tender document for the procurement of the next generation of gates had not yet been published and that this would feed into work on the 2025 UK Border Strategy which was being led by the Future Borders and Immigration System. DDaT staff also said that they had been involved in designing the tender document.

## Border Code

- 12.29** The Home Office describes Border Code as “the delivery partner for the Future Borders & Immigration Systems (FBIS) Digitising the Border (DtB) Border Intervention work.” It is being developed by the Border Force (BF) Industry Partnerships team and will “develop a minimum set of government standards that industry would be expected to comply with to invest in technology at the border.”
- 12.30** The approach recognised stakeholders’ contributions to the 2025 UK Border Strategy consultation. One industry body stated that as “As the UK Border remains a UK government responsibility, future growth should be resourced by government. Industry and passengers

---

<sup>88</sup> See: <https://www.techuk.org/>

already “pay their way”, for example through APD, visa charges, e-Gate installation and maintenance costs, and premium services.”

- 12.31** Another told inspectors that “Border Force should work with airports and ePassport gate manufacturers to continuously improve the operation of existing ePassport gates to improve throughput and reduce referrals.” They also recognised the potential of using improved facial recognition algorithms to improve imposter detection and reduce false negative matches at the ePassport gates and recognised the potential to redirect passengers in possession of an ‘e-Visa’ to use the ePassport gates.

## Learning from others

### External engagement

- 12.32** In terms of learning from and sharing experiences with international partners regarding ePassport gate operations, the Home Office told inspectors that it was an active participant in the European Border and Coast Guard Agency (FRONTEX). FRONTEX holds an ABC (automated border control) Working Group each year, but the Home Office told inspectors that minutes of the meetings were not available. Inspectors were also unable to find copies of the minutes or agendas for these meetings on the FRONTEX website.<sup>89</sup>
- 12.33** The 2025 UK Border Strategy recognises the advantages of continued involvement with FRONTEX, stating that “the UK will seek to maintain our close working relationship with our European partners and continue to work closely to improve border control policies, where appropriate”. Despite this, BICS PI policy staff told inspectors that following its departure from the EU, the UK’s future role in the agency was unclear.
- 12.34** Both DPS and BICS PI staff are members of the Biometrics Institute.<sup>90</sup> The Home Office said that a ‘Borders User Group’ is convened in the margins of its conferences, attendance at which is strictly for government authorities. A number of members have gates supplied by Vision-Box and Home Office commercial staff said attendance at the meetings had made the Home Office aware of Vision-Box’s other customers and their views on the performance of Vision-Box. Discussions could include “performance and any issues...GDPR, data, equality, balance between security and privacy.” Meetings are “conducted under Chatham House rules.”<sup>91</sup> No minutes are produced, and presentations are not circulated in advance or after the meetings.” BICS PI staff said that the Institute would play a greater role in the next generation of gates in terms of which biometrics, such as fingerprints, might be used.
- 12.35** The Home Office said that given the length of time gates have been deployed in the UK, “communications are often instigated by other countries seeking to learn lessons from the UK’s experience.” One international stakeholder told inspectors that they had held discussions with Border Force about lowering the age of passengers that could use their gates to 12. They worked closely with Border Force who had shared their ‘protecting the vulnerable’ training with them. They said that there was “great cooperation” with the UK and that they may work on joint operations in the future.

---

<sup>89</sup> [Frontex | European Union Agency \(europa.eu\)](https://frontex.europa.eu/)

<sup>90</sup> <https://www.biometricsinstitute.org/>: A non-governmental organisation established to “promote the responsible and ethical use of biometrics and biometric analytics in an independent and impartial international forum for biometric users and other interested parties.”

<sup>91</sup> “a rule or principle according to which information disclosed during a meeting may be reported by those present, but the source of that information may not be explicitly or implicitly identified.” See: <https://www.bing.com/search?q=chatham+house+rules&qsn=&form=QBRE&sp=-1&ghc=1&pq=chatham+house+rules&sc=8-19&sk=&cvid=0D710F4A399E43E791D3C7336F01F031>

- 12.36** Inspectors sought to understand how customer feedback and the experiences of staff working on the gates fed into improvements and future developments of the gates. A senior manager in DPS said that it was hard to evidence how Border Force learned from its experience of using the gates, and this again raised the question as to whether the management information the gates generated was “adequate”. They said that confidence in the way the gates operated had grown, but there was a realisation by Border Force that the Home Office had not made optimum use of them. Another manager said that DPS worked closely with the Border Force customer insight and industrial partners teams when considering updates to the gates.
- 12.37** BICS PI policy staff said that developments were “informed by our experience of success and failure” and there was a lot of publicly available research on the strength of the gates. They said that they had undertaken a lot of surveys of passengers to understand their experience of using the gates following the expansion to B5JSSK nationals. They also said that they undertook “a lot of engagement” with Five Eyes partners<sup>92</sup> and Singapore to learn from technological developments. However, Border Force Operational Policy staff told inspectors that their use of customer insight was limited, “there might have been some customer insight conducted as part of the B5JSSK programme, but this was in the context of a large change programme. If it was gathered this would have been done through HO analysis and insight.”

## Internal engagement

- 12.38** Border Force operates a staff feedback forum called All Ideas Matter which is hosted on the Home Office intranet. Suggestions have been made by Border Force staff relating to the gate operation, including calculating a child’s age from the information in the passport and displaying it on the monitoring officer’s screen to inform them whether the child was under the age of 18, and negating the need to turn off a bank of desks which causes queues to form when a new officer logs into the system. From a passenger perspective, suggestions include providing instructions on how to use a gate in the passenger’s language. (Inspectors noted that Vision-Box’s newer government clients use an updated gate model that includes an “avatar to assist the passenger and improve throughput”.)
- 12.39** Responses to the suggestions were provided by DPS staff but inspectors found them to be rather technical and considered that they may not have been particularly informative for the initiators of the suggestions. For example, they referred to the “configuration requirements of this new interface” and “significant cost and complexity lies in changing the current ePassport gates software to accommodate the new code”. Further updates to potential solutions were not provided on the forum and the ideas were closed after the initial response was provided.

---

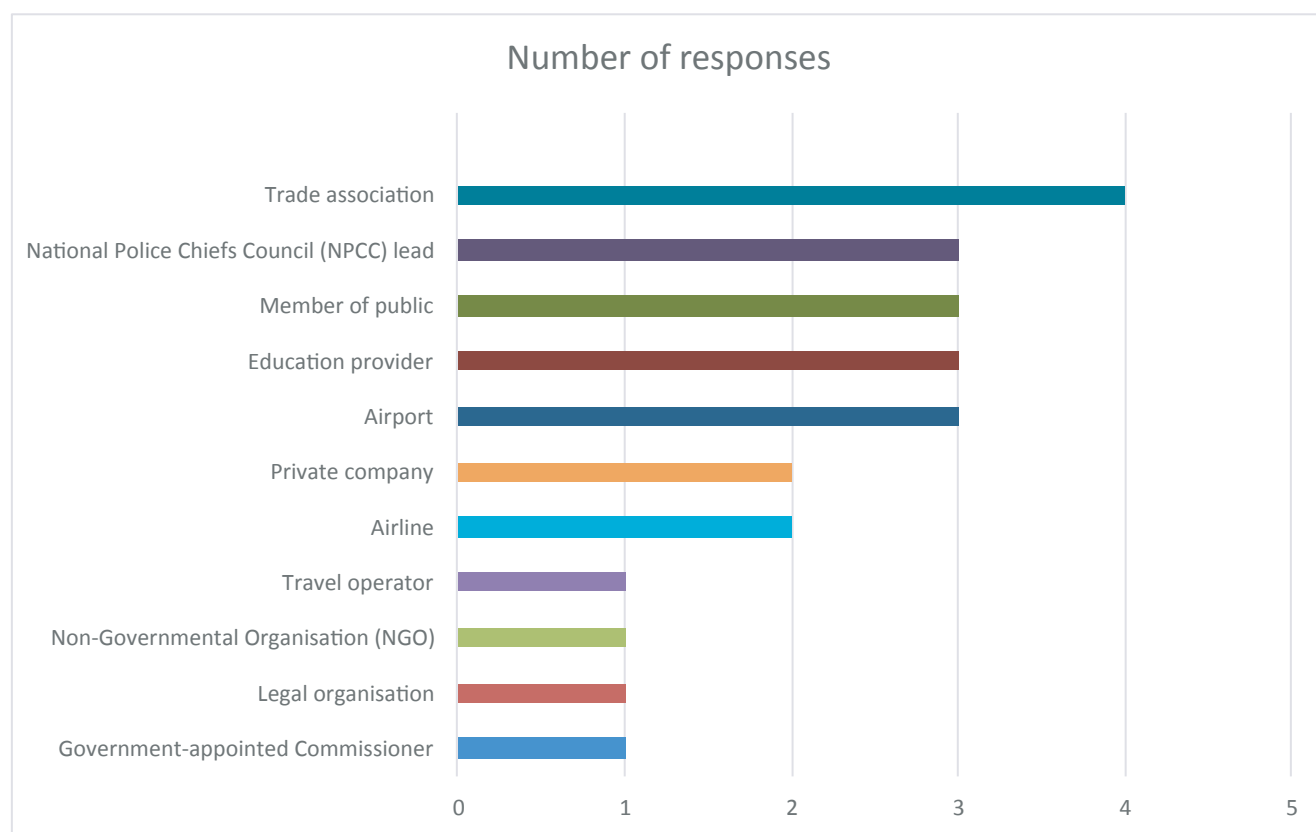
<sup>92</sup> See: [https://en.wikipedia.org/wiki/Five\\_Eyes](https://en.wikipedia.org/wiki/Five_Eyes)

## Annex A: Responses to the call for evidence

On 10 August 2020, the ICIBI published a “call for evidence” on the ICIBI website. This invited “anyone with relevant knowledge and expertise” and in particular “port operators, airlines, rail operators, passenger groups, education providers, NGOs and legal representatives” to provide evidence and views on the “how well the ePassport gates are working and where improvements are necessary”. The Independent Chief Inspector also wrote directly to a number of stakeholders to encourage them to contribute.

The “call for evidence” closed on 7 September 2020, although in some cases an extension for submissions was agreed. ICIBI received 24 submissions: 4 from trade associations; 3 each from education providers, members of the public, airport operators and National Police Chiefs Council (NPCC) leads; 2 each from airlines and private companies; and one each from a government-appointed commissioner, a legal organisation, a Non-Governmental Organisation (NGO) and a travel operator. Inspectors analysed the submissions for common themes and key points. In some cases, inspectors conducted more in-depth conversations with these stakeholders to ensure a full understanding of the issues raised.

**Figure 17:** Number of responses to call for evidence, by respondent type



While airport operators, airlines and trade bodies representing these groups highlighted the general positive effect the gates have had at ports, submissions outside these groups raised a number of

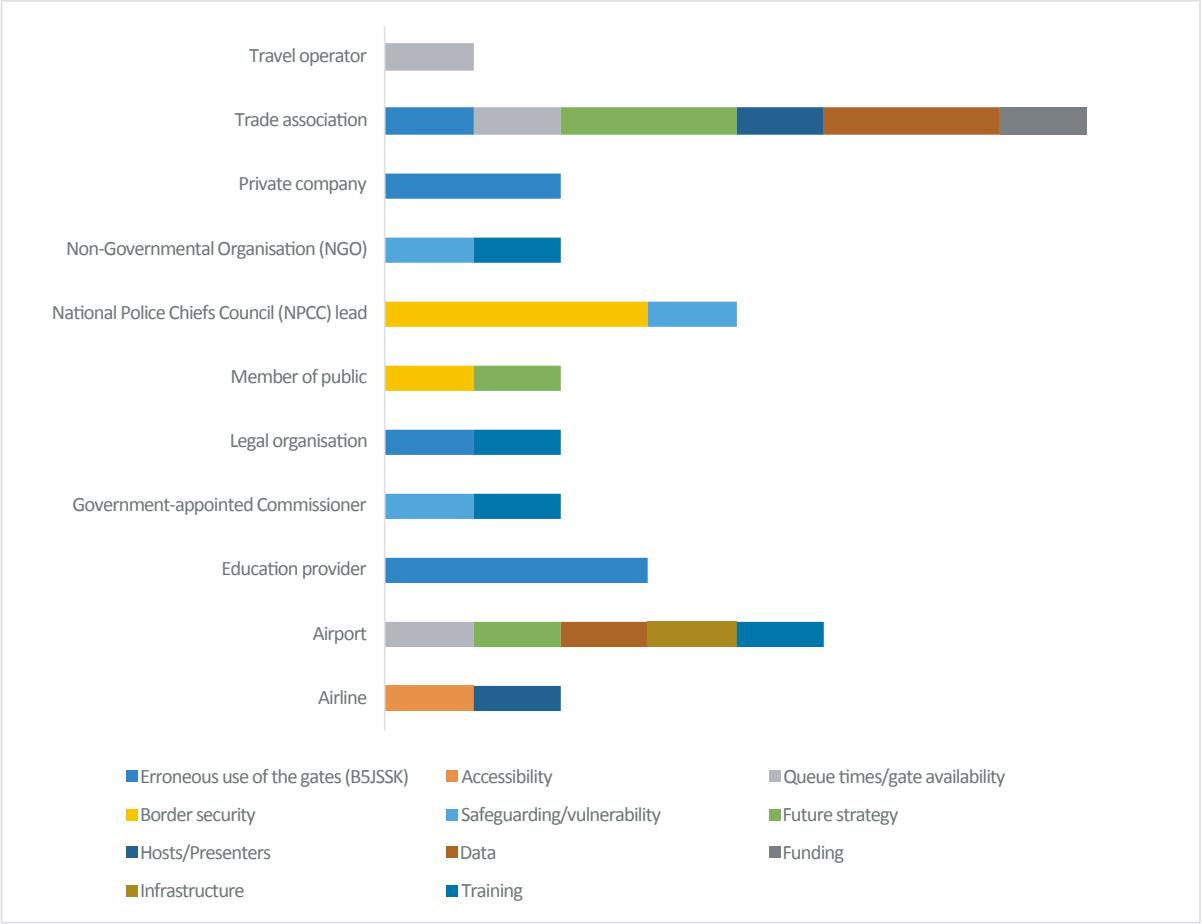
concerns with the way the gates are operated and managed. All of the stakeholder submissions received identified areas for improvement, even in cases where the submission was broadly positive.

**Figure 18:** Common themes in response



As expected, the majority of responses relating to erroneous use of the gates came from education providers and private companies. The National Police Chiefs’ Council (NPCC) leads were mostly concerned with security at the border, and responses relating to future strategy came from airport operators and trade bodies who represent them.

**Figure 19: Common themes by respondent type**





# Annex B: 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 to 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 her 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 Inspectorate of Constabulary and Fire & Rescue Services (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
- 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 her 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 she has committed to do within eight 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 C: ICIBI's '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


The inspection team is grateful to the Home Office for its co-operation and assistance during the course of this inspection and for the contributions from the staff who participated. We are also grateful to the stakeholders who contributed.

## Inspection Team

Lead Inspector	Chris Green
Project Manager	David Rhys-Jones
Inspector	Jack Percival





The background is a solid blue color. It features several sets of concentric, curved white lines that sweep across the page. One set of lines is in the upper right corner, another set is in the lower left corner, and a third set is on the right side. These lines create a sense of movement and depth.

ISBN 978-1-5286-2838-9  
CCS0621775782  
E02688843